

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2_2)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company Name Sime Darby Plantation Berhad
Client Company Address: Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 3) – Elphil Palm Oil Mill
Location of Certification Unit: Batu 6, Jalan Lintang, Sungai Siput Utara, 31100 Sungai Siput, Perak, Malaysia
Date of Final Report: 23/05/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Sime Darby Plantation Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 3) – Elphil Palm Oil Mill		
Location / Address	Batu 6, Jalan Lintang, Sungai Siput Utara, 31100 Sungai Siput, Perak, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Mdm.Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM)	E-mail	Shylaja.vasudevan@simedarby.com
Telephone	+603-78484000 (Head Office)	Facsimile	+603-78487356 (Head Office)

2. Certification Information			
Certificate Number	RSPO 550180	Certificate Start Date	18/06/2021
Date of First Certification	18/06/2011	Certificate Expiry Date	17/06/2026
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	45mt/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 705883	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services (M) Sdn. Bhd.	24/03/2028
MSPO 705885	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		24/03/2028
MSPO 717672	MSPO SCCS: 2018		11/11/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Elphil Palm Oil Mill	Batu 6, Jalan Lintang, Sungai Siput Utara, 31100 Sungai Siput, Perak, Malaysia.	4° 53' 24.90" N	101° 5' 38.00" E
Elphil Estate	Ladang Elphil, Jalan Lintang, 31100 Sungai Siput(U), Perak, Malaysia	4° 53' 24.90" N	101° 5' 38.00" E
Kamuning Estate	Ladang Kamuning/Changkat Salak, 31100 Sungai Siput (U), Perak, Malaysia.	4° 49' 34.80" N	101° 3' 43.70" E
Kinta Kellas Estate	Ladang Kinta Kellas, 31007, Batu Gajah, Perak, Malaysia.	4° 27' 46.15" N	101° 4' 30.72" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Elphil Estate	1,660.33	26.426	177.024	1,863.78	88.34
Kamuning Estate	2,638.19	84.59	1,165.65	3,888.43	67.85
Kinta Kellas Estate	936.34	3.69	100.71	1,040.74	89.97
Total	5,234.86	114.706	1,443.384	6,792.95	82.06

Note: *Correction made on the hectareage of HCV under Elphil Estate (26.426 ha, previously reported as 26.53 ha)

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6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Elphil Estate	218.63	373.26	176.01	892.43	1,441.70	218.63
Kamuning Estate	508	857	237	1,036.19	2,130.19	508
Kinta Kellas Estate	59.61	367.8	0	508.93	876.73	59.61
Total (ha)	786.24	1,598.06	393.91	2,437.55	4,448.62	786.24

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (June 2022 – May 2023)	Actual (March 2022 – Jan 2023)		Forecast (June 2023 – May 2024)
		Previous license period (Mar 2022 – June 2022)	Current license period (July 2022 – Jan 2023)	
Elphil Estate	32,302.01	8,411.68	14,531.53	26,221.00
Kamuning Estate	38,559.88	8,105.94	14,046.35	29,443.00
Kinta Kellas Estate	16,574.00	-	6,666.00	15,480.07
Total	87,435.89	51,761.50		71,144.07

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (June 2022 – May 2023)	Actual (March 2022 – Jan 2023)		Forecast (June 2023 – May 2024)
		Previous license period (Mar 2022 – June 2022)	Current license period (July 2022 – Jan 2023)	
Chersonese Estate		51.97	21.35	
Kalumpong Estate		111.92	101.18	
Total		286.42		

Note: Crop diversion from other certified unit(s) within the same management.

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (June 2022 – May 2023)	Actual (March 2022 – Jan 2023)		Forecast (June 2023 – May 2024)
		Previous license period (Mar 2022 – June 2022)	Current license period (July 2022 – Jan 2023)	
OCP @ 3 rd party supplier (non-certified)	N/A	57,368.89	88,844.21	N/A
Total		146,213.10		

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	Mar 2022	4,248.600	15,356.24	19,605.224
2	Apr 2022	4,115.020	15,096.257	19,211.277
3	May 2022	3,936.300	12,338.310	16,274.610
4	June 2022	4,381.590	14,578.086	18,959.676
5	July 2022	5,084.360	12,586.647	17,671.007
6	Aug 2022	5,819.460	15,064.063	20,883.523
7	Sept 2022	5,448.290	13,511.920	18,960.210
8	Oct 2022	5,171.200	11,716.908	16,888.108
9	Nov 2022	4,392.460	11,725.963	16,118.423
10	Dec 2022	4,802.730	12,688.980	17,491.710
11	Jan 2023	4,647.910	11,549.725	16,197.635
	TOTAL	52,047.92	146,213.10	198,261.40

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (June 2022 – May 2023)	Actual (March 2022 – Jan 2023)		Forecast (June 2023 – May 2024)
	Previous license period (Mar 2022 – June 2022)	Current license period (July 2022 – Jan 2023)	
FFB	FFB		FFB
87,435.89 mt	16,681.51 mt	35,366.41 mt	71,144.07 mt
	TOTAL	52,047.92 mt	
CPO (OER: 20.75%)	CPO (OER: 19.77%)		CPO (OER: 20.67%)
18,142.94 mt	3,275.11 mt	7,012.46 mt	14,705.48 mt

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	TOTAL	10,287.57 mt		
PK (KER: 5.40%)	PK (KER: 4.84%)		PK (KER: 5.24%)	
4,721.53 mt	866.34 mt	1,652.48 mt	3,727.95 mt	
	TOTAL	2,518.82 mt		

Note: % oil yield or OER = $x*100/y$ where, x is define as mass of oil extracted or CPO and y is defined as mass of oil palm fruits or FFB

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Mar 2022	816.19	226.025
2	Apr 2022	829.58	223.857
3	May 2022	781.56	199.570
4	June 2022	847.78	216.889
5	July 2022	1,051.29	229.305
6	Aug 2022	1,169.92	290.391
7	Sept 2022	1,065.44	271.869
8	Oct 2022	996.35	236.841
9	Nov 2022	862.30	169.549
10	Dec 2022	941.72	229.570
11	Jan 2023	925.44	224.958
TOTAL		10,287.57	2,518.82

11. Summary of Actual Volume sold					
Current License period (July 2022 – Jan 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	-	-	-	7,007.33	7,007.33
PK (MT)	-	-	-	1,655.82	1,655.82
Credits	-	-	-	-	-
Previous License period (Mar 2022 – June 2022)					
CPO (MT)	1,975.73	-	-	1,204.51	3,180.24
PK (MT)	163.33	-	-	680.34	843.67
Credits	-	-	-	-	-

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11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	ABC	TR-3335f17c-3b54	1,433.42	-
2	DEF	TR-9f2afc17-79f1	542.31	-
3	XYZ	TR-Fc704b43-065b	-	163.33
TOTAL			1,975.73	163.33

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
-	-	-	-	-
TOTAL			-	-

11C. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)	
1.	xxxxxxxxx	8,211.84	-	
2.	xxxxxxxxx	-	2,345.49	
TOTAL		8,211.84	2,345.49	
Note: Uncertified FFB received from Table 9 has also been taken into consideration for the sale of conventional of CPO and PK				

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

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

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

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

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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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 **27/02/2023-02/03/2023**. 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.

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Elphil Palm Oil Mill	✓	✓	✓	✓	✓
Elphil Estate	✓	✓	✓	✓	✓
Kamuning Estate	✓	✓	✓	✓	✓
Kinta Kellas Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: February 27, 2024 - March 2, 2024

Total Number of Mandays: 12 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Mohamed Hidhir Bin Zainal Abidin (MHZA)	Team Leader	<p>Education: Holds a Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p>Work Experience: 4½ years working experience in palm oil industry specifically in palm oil mill as Mill Engineer. More than 10 years of auditing experience with accredited certification body for several schemes include ISO9001, ISO14001, OHSAS18001 (now ISO45001), RSPO, MSPO and RBA Labor Ethics</p> <p>Training attended: He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, HCV & HCS Introductory Training SMETA Requirements Training, RSPO ISH Auditor Training and Endorsed RSPO Refresher Training.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements.</p>
Nor Halis Abu Zar (NHA)	Team Member	<p>Education: Holds a Bachelor of Science in Plantation Technology and Management, University Technology Mara</p> <p>Work Experience: He has 6 years' experience in Oil Palm Estate Management with Kulim Plantations Sdn. Bhd. The last position held was Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He</p>

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		<p>is a qualified Lead Auditor for MSPO and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed ISO IMS 9001 and 14001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor Course, ISO 45001 Lead Auditor Course, ISO 9001:2015 Lead Auditor Course, MSPO SCCS Auditor Course SMETA Requirement Training and RSPO ISH Auditor Training.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit: Occupation Health Safety requirement, HIRARC, Environment responsibility, training, environment impact assessment and management plan.</p>
Valence (VSH)	Shem	<p>Team Member</p> <p>Education: Holds a Bachelor’s Degree in Industrial Technology from University of Science Malaysia</p> <p>Work Experience: He has 9 years working experience in oil palm plantation industry as estate manager. Since 2009 he has stated auditing professionally in several management system including ISO 140001, RSPO P&C, RSPO SCCS, MSPO and SMETA.</p> <p>Training attended: He has completed ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Training, Endorsed RSPO P&C Lead Auditor Training, Endorsed RSPO SCCS Lead Assessor Training, MSPO Awareness Training, ISO 45001 Lead Auditor Training, SMETA Auditor Training, HCV-HCS training and RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Training and Endorsed RSPO refresher courses.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, workers’ welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO supply chain requirements.</p>

Accompanying Persons:

Name	Role
N/A	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	MHZA	VS	NHA
Sunday 26/2/2023	PM	Audit team travel to Ipoh. Check in at MH Hotel, Ipoh	√	√	√

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Monday 27/2/2023 Elphil Estate	0730	Audit team travel to Elphil Estate	√	√	√
	0830 – 0900	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). • Verification on previous audit findings. 			
	0900 – 1300	Elphil Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc	√	√	√
	1300 – 1400	Lunch	√	√	√
	1400 – 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 – 1700	Interim Closing Briefing	√	√	√
Tuesday 28/2/2023 Elphil POM	0730	Travel to Elphil POM	√	√	√
	0830 – 1300	Elphil POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area			
	1000 – 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	1300 – 1400	Lunch	√	√	√

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	1400 – 1630	Elphil POM Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc	√	√	√
		RSPO Supply chain requirements for mill - Identity Preserved Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out	√	√	√
		- Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims			
	1630 – 1700	Interim Closing Briefing	√	√	√
Wednesday 1/3/2023 Kinta Kellas Estate	0730	Travel to Kinta Kellas Estate	√	√	√
	0830 – 1300	Kinta Kellas Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1000 – 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	1300 – 1400	Lunch break	√	√	√
	1400 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 1700	Interim Closing Briefing	√	√	√

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Date	Time	Subjects	MHZA	VS	NHA
Thursday 2/3/2023	0730	Travel to Kamuning Estate	√	√	√
Kamuning Estate	0830 – 1300	Kamuning Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1300 – 1400	Lunch break	√	√	√
	1300 – 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 – 1700	Interim Closing Briefing	√	√	√
Friday 3/3/2022	AM	Audit team travel back to KL	√	√	√

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. The maximum timeline for certification is by 30 th June 2018 (for those that have membership date before 1st July 2018)	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management. 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): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No. There is no new acquisitions as at latest TBP 2022 dated September 2022.	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

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	<p>As the latest TBP, all units will be certified on 2023. SDP has submitted the latest TBP to be approved by RSPO Secretariat. As per reply from Deputy Director of Compliance, RSPO Secretariat on 26/01/2022, for RSPO membership date before 1st July 2018, the new TBP is before 30th June 2023. Since SDP TBP is within June 2023, no approval is required from RSPO Secretariat.</p>	
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.</p> <p>Is this consistent with the ACOP reporting?</p>	<p>Yes.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations. ACOP 2021 has been cross-referenced as below: https://rspo.org/members/1-0008-04-000-00/</p>	<p>Complied</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>

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with implementation of the plan? If yes a Major non-compliance shall be raised		
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification</p> <ol style="list-style-type: none"> 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/certification/new-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-subsiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd 3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd 4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited 5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms 6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png 7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png 8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-roka-mini-estate 	Complied

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	<p>plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate</p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate</p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm</p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment</p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1</p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment</p> <p>Management units for 11 – 13 above were disposed.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As 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.</p> <p>As of 10/3/2023, 14 out of 19 LUCAs were approved and remaining 4 are still pending from RSPO.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent</p>	<p>Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through</p>	<p>Complied</p>

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with the requirements of RSPO P&C criteria 2.1	the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.	
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 Jun 2022 – August 2022. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no labour disputes and legal compliance is monitored during the internal audit as the positive assurance. Land disputes are currently in the resolving process.	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 included in the scope of certification.	Not Applicable

Approved Time Bound Plan

SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

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

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

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

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

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

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

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

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

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

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		Sungai Cengal Estate			Kotabaru District – South Kalimantan			Plantation. The decision of certification is from KKPA / Plasma themselves.
		Bakau Estate						
		KKPA LMR	TBC	TBC		TBC	TBC	
5	PT Kridatama Lancar	Sukamandang Mill	-	-	Seruyan and East– Kotawaringin District Central Kalimantan	Certified	05/07/2011	-
		Sukamandang Estate						
		Sapiri Estate						
		Barasdanum Estate						
		Kuala Kuayan Estate						
6	PT Bahari Gembira Ria	Ladang Panjang Mill	-		Muaro Jambi District - Jambi	Partially Certified	09/07/2012	Only Division 3 is certified (1,202 Ha). Total Areas of Division 1 and 2 (1,796.19 ha) HGU still in process. Plan for certification is by 2023. KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Ladang Panjang Estate						
		Plasma BGR Estate	TBC	TBC		TBC	TBC	
7	PT Tunggal Mitra Plantations	Manggala Mill	-	-	Rokan Hilir District – Riau	Certified	25/11/2010	-
		Manggala 1 Estate						
		Manggala 2 Estate						
		Manggala 3 Estate						
8	PT Paripurna Swakarsa	Pondok Labu Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	-
		Pondok Labu Estate	-	-				
		Binturung Estate						
		Rampa Estate						
		Sesulung Estate						
9		Gunung Aru Mill	-			Certified	05/07/2011	-

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

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		Sekayu Estate						
12	PT Indotruba Tengah	Sekunyir Mill	-	-	Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23/11/2010	-
		Sekunyir						
		Seruyan Estate						
13	PT Swadaya Andika	Selabak Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	Mill closed down and all the supply bases was transferred to Rantau Mill – PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri – Rantau Factory certification.
		Selabak Estate						
		Randi Estate						
		Sangkoh Estate						
		Lanting Estate						
14	PT Bina Sains Cemerlang	Sungai Pinang Mill	-	-	Musi Rawas District – South Sumatera	Partially Certified	11/09/2012	Remarks: Land legalisation process for 308.35 ha is still in process and plan to be certified by 2023.
		Sungai Pinang Estate						
		Bukit Pinang Estate						
15	PT Teguh Sempurna	Pemantang Mill	-	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	05/07/2011	-
		Pemantang Estate						
		Kawan Batu Estate						
		Hatan Tiring Estate						
		Batang Garing Estate						
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill	-	-	Indra Giri Hilir District – Riau	Certified	11/10/2011	-
		Teluk Bakau Estate						
		Nusa Lestari Estate						
		Nusa Perkasa Estate						
		Mandah Mill						
		Mandah Estate						
		Rotan Semelur Estate						
						01/04/2014		

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17	PT Intipersada Aneka	Teluk Siak Mill	-	-	Pekanbaru, Siak District – Riau	Certified	11/10/2011	-
		Teluk Siak Estate						
		Pinang Sebatang Estate						
		Aneka Persada Estate						
18	PT Tamaco Graha Krida	Ungkaya Mill	-	-	Morowali District – Sulawesi Tengah	Certified	10/7/2012	-
		Ungkaya Estate						
		Plasma TGK Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
19	PT SIME Indo Agro	Bukit Ajong Mill	-	-	Sanggau District – West Kalimantan	Certified	18/10/2010	Land legalization process for East Est for 5815.64 ha is still in process.
		West Estate						
		East Estate						
		East* Estate /Sei Mawang Estate	2023	-		-	-	Land legalization for Sei Mawang is still in process
		East Plasma Estate	-	-		Certified	18/7/2016	-
		West Plasma Estate						
20	PT Padang Palma Permai /PT Perkasa Subur Sakti	Blang Simpo Mill	-	-	Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	03/05/2013	-
		Tamiang (PT PPP) Estate						
		Batang Ara (PT PSK) Estate						
		Blang Simpo-01 Estate						
		Blang Simpo-02 Estate						
21	PT Natapalma Sandika	Lembiru Mill	-	-	Ketapang District – West Kalimantan	Certified	03/07/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.
		Lembiru Estate						

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

Notes:
 Minamas, support smallholders through two programmes: the Kredit Koperasi Primer Anggota (KKPA) and Pola Inti Rakyat (PIR) schemes. SDP is supporting smallholders’ efforts to become RSPO certified through these programmes. In 2014, the first group of KKPA smallholders in Indonesia achieved certification. As of December 2021, some 14,768 scheme smallholders, representing 52% of our scheme smallholders, are RSPO certified. This number is on the uptrend. However, our efforts were hampered by challenges in obtaining land titles and meeting the associated regulatory requirements related to land. However, SDP is committed to supporting scheme landholders, aiming at 100% certification by June 2023.

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

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
1		Tetere Oil Mill	-		Certified	18/03/2011	-

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	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Estate		Guadalcanal Province, Solomon Islands			
		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 Province, PNG	Certified	19/03/2012	-
		Kara Estate					
		Nalik Estate					
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					

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		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					
4	Ramu Agricultural Industrial Ltd (RAIL)	Gusap Mill	-	Morobe Province, PNG	Certified	05/08/2010	-
		Gusap East (Gusap) Estate					
		Gusap West (Paddox) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	Oro Bay Province, PNG	Certified	01/02/2013	-
		Mamba Oil Mill					
		Embi Estate					
		Ambogo Estate					
		Sangara Estate					
		Sumbiripa Estate					
		Mamba Estate					
		Sambogo Estate					
		Scheme Smallholder Sorovi Division(2019)					
		Scheme Smallholder Saiho Division(842)					
		Scheme Smallholder Aeka Division (911)					

		Scheme Smallholder Igora Division (1367)					
		Scheme Smallholder Ilimo Division (671)					
6	West New Britain (WNB)	Mosa Oil Mill	-	Kimbe, West New Britain, PNG	Certified	10/09/2008	-
		Kumbango Oil Mill					
		Kapiura Mill					
		Numundo Mill					
		Waraston Mill					
		Bebere Estate					
		Kumbango Estate					
		Togulo Estate					
		Dami Estate					
		Waisisi Estate					
		Kautu Estate					
		Karausu Estate					
		Moroa Estate					
		Bilomi Estate					
		Loata Estate					
		Haella Estate					
		Garu Estate					
		Daliavu Estate					
		Sapuri Estate					
		Malilimi Estate					
		Rigula Estate					
		Numundo Estate					

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		Navarai / Karato ME /KDC EU Estate					
		Volupai / Lotomgam / Natupi / Goruru Estate					
		Lolokoru Estate					
		Ove Estate					
		Tamare Estate					
		Smallholders LSS Mosa (1822)					
		Smallholders VOP East (1817)					
		Smallholders VOP Central (1964)					
		Smallholders VOP West (1279)					
		Smallholders LSS Kapiura (551)					
		Smallholders VOP Kapiura (850)					
		Smallholder Kaulong / Akami / Pushiki / Repamira / Sakapei					
7	Markham Farms Company Limited (MFCL) / Markham Agro Pte Ltd	Erap Mill	-	Markham Farms	Certified	27/3/2020	There is total area NPP: 710.30ha which is currently excluded from the certification scope until the NPP is approved
		Munum Estate					
		Maralumi Estate					
		Erap Estate					

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were (0) Critical; (2) Minor nonconformities and (0) Opportunity For Improvement raised. The Strategic Operating Unit (SOU 3) - Elphil Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2316980-202302-N1	Issued Date	02/03/2023
Due Date	1/03/2024	Closure Date	"Open"
Indicator & Category (Critical / Minor)	7.3.1 (Minor)		
Statement of Nonconformity:	Waste management plan to include recycling and disposal of waste generated from external parties were not comprehensively documented and implemented.		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Objective Evidence:	<p>Kinta Kellas Estate Sighted empty paint containers, used oil lubricant (red color), used oil/grease (yellow color) was dumped near to post guard. Based on information given by management team, the waste was temporary stored by contractor after completing work in the estate.</p> <p>Kamuning Estate Onsite interview was carried out with Yih Construction Sdn Bhd has confirmed that machinery maintenance and service was done on the ground. Responsibilities of the said contractor to manage all waste (SW, recycle, domestic waste etc) generated accordingly was spelled out under contract form, term of delivery no. (iii). However, this was not clearly defined under waste management plan for FY2023.</p>		
Corrections:	<p>Kinta Kellas Estate Estate Management immediately collect used oil lubricant and empty paint container and stored at scheduled waste store for disposal purposes.</p> <p>Kamuning Estate Estate Management immediately informed Yih Construction Sdn Bhd not to conduct machinery services on the ground without proper tray and prevent direct soil contamination on the ground. Others, estate management already add on scheduled waste handling by contractor inside waste management plan.</p>		

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Root Cause Analysis:	<p>Kinta Kellas Estate</p> <p>During the audit, contractor still working in progress to complete construction inside estate. Contractor not stored empty paint container, used oil /grease container at scheduled waste area . The contractor also lack of knowledge on the Environmental Quality Act (Scheduled Waste) Reg 2005.</p> <p>Kamuning Estate</p> <p>The contractor not adhere as per the contract . The contractor also not clear on how to handle scheduled waste until scheduled waste disposal.</p>
Corrective Actions:	<p>Kinta Kellas Estate</p> <ol style="list-style-type: none"> 1. Estate management will conduct scheduled waste training to the respective contractor. 2. Estate will monitor through workplace inspection from time to time to ensure all contractor’s scheduled waste are cleared from site after finishing their work/service. 3. Estate will include contractor’s scheduled waste management in annual Waste Management Plan 2023. <p>Kamuning Estate</p> <ol style="list-style-type: none"> 1. Estate management will include the contractor for scheduled waste training. 2. Estate will monitor through workplace inspection from time to time at the contractor area and to ensure all scheduled waste dispose as per Environmental Quality Act (Scheduled waste) Reg 2005.
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit.

Non-conformity			
NCR Ref #	2316980-202302-N2	Issued Date	02/03/2023
Due Date	01/04/2024	Closure Date	“Open”
Indicator & Category (Critical / Minor)	7.11.3 (Minor)		
Statement of Nonconformity:	Engagement process with adjacent stakeholders on fire prevention and control measures was not effectively implemented.		
Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
Objective Evidence:	<p>Kinta Kellas Estate</p> <p>Identification of adjacent stakeholders (land owner - durian orchard and private estate owner - PPNP estate) was not updated in the stakeholder map. The said stakeholders were not part of stakeholders consulted during annual stakeholder meeting on 28/12/22. The names were not captured in the latest stakeholder list for FY 2023.</p>		

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	<p>Kamuning Estate Identification of adjacent stakeholders (village/community – Kg Trosor and private estate owner - Karai estate) was not updated in the stakeholder map. The said stakeholders were not part of stakeholders consulted during annual stakeholder meeting on 9/2/23. The names were not captured in the latest stakeholder list for FY 2023</p>
<p>Corrections:</p>	<p>Kinta Kellas Estate Estate management will conduct annual review of stakeholders list to ensure that the List and Stakeholders Map is kept up-to-date to include the adjacent stakeholders through various approaches/mehanisms/engagements. Estate Management to revise and update the contact details of the durian orchard owner and PPNP Estate into List of Stakeholder and stakeholder map followed by engagements during annual stakeholder meetings.</p> <p>Kamuning Estate Estate management will conduct annual review of stakeholders which includes the broader understanding that stakeholders are: An individual or group with a legitimate and/or demonstrable interest in, or who is directly affected by, the activities of an organisation and the consequences of those activities. (RSPO MYNI 2019) and to ensure that the Stakeholders List and Map is kept up-to-date to include the relevant stakeholders through various approaches/mehanisms/engagements. Estate Management to revise and update the contact details of the village head of Kg Trosor and owner of Karai Estate/private estate into List of Stakeholder and stakeholder map followed by engagements during annual stakeholder meetings.</p>
<p>Root Cause Analysis:</p>	<p>Kinta Kellas Estate No mechanism/approach by the estate to identify and locate the relevant stakeholders and their details for further stakeholder engagements.</p> <p>Kamuning Estate Misinterpretation by estate on the narrow definition of 'stakeholders' which only includes stakeholders that is bordering the estate/ within the adjacent estate parameter.</p>
<p>Corrective Actions:</p>	<p>Kinta Kellas Estate Estate Management to identify and locate the durian orchard owner and PPNP estate via various mechanism/approaches to obtain the relevant contact details eg through contacting related government agencies/smallholders association, or through inputs of other adjacent stakeholders/smallholders. Others, to identify the stakeholder from Google map layer and proceed with the engagement process once the stakeholder had been identified.</p> <p>Kamuning Estate</p>

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	Estate Management to identify and locate the village head of Kg Trosor and owner of Karai Estate/private estate to obtain the relevant contact details via various mechanism/approaches eg through contacting related government agencies/smallholders association, or through inputs of other adjacent stakeholders/smallholders. Others, to identify the stakeholder from Google map layer and proceed with the engagement process once the stakeholder had been identified.
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit.

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good corporation given by the management unit team and HQ team throughout the assessment week.
PF 2	Tremendous improvement observed since the previous audit in maintain RSPO P&C certification.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2179275-202203-M1	Date Issued	18/03/2022
Due Date	16/06/2022	Date of nonconformity Closure	18/05/2022
Clause & Category (Critical / Minor)	2.1.1 (Critical)		
Statement of Nonconformity:	The Compliance Conditions for DOE Compliance Schedule were not met.		
Requirement Reference:	The Unit of Certification complies with legal requirements		

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Objective Evidence:	<p>The DOE Jadual Pematuhan (License Number: 001845) states under the license approval conditions among others as below:</p> <p>9. <i>Premis hendaklah memastikan kedalaman kolam pengolahaan sentiasa kekal mengikut rekabentuk yang telah diluluskan dan mengekalkan freeboard sekurang-kurangnya 0.5m atau 20% safety margin, yang mana lebih besar.</i></p> <p>10. <i>Setiap kolam pengolahaan effluen hendaklah dipasang Papan Tanda yang mempunyai maklumat nama kolam, kapasiti rekabentuk, tempoh penahanan effluen, Tarikh akhir penyingkiran enapcemar dan ketinggian freeboard.</i></p> <p>Based on the site visit to the mill effluent treatment pond, the following non-complying conditions were verified.</p> <ol style="list-style-type: none"> The Acidification Pond No.1, Acidification Pond No. 2 and Aerobic Pond was found to not have the freeboard specification as required in the Compliance Schedule. The signages for each effluent treatment pond that are in place did not include all the required information as required in the Compliance Schedule.
Corrections:	<ol style="list-style-type: none"> To add information on freeboard specification in the signage details. To emphasize that freeboard specification is set at minimum of 0.5 m based on Compliance Conditions for DOE Compliance Schedule. To raise the bund surrounding the pond and to ensure freeboard with required specification. To desilt the pond with heavy solid.
Root Cause Analysis:	<ol style="list-style-type: none"> Heavy rains for the past few days has caused high volume of POME at ponds. Freeboard specification was not included in the early design of signage board.
Corrective Actions:	<ol style="list-style-type: none"> Ensure rotation on night shift basis to monitor and record the level of pond. In case if there is rainy season, mill will continue pump for furrow application on extra hours. To add details on freeboard specification at each pond signage.
Assessment Conclusion:	<p><u>Critical NC Close Out Verification</u></p> <ol style="list-style-type: none"> Verified that all the signages had included the information on freeboard specifications. ETP Operator checks on the depth of the freeboard on a daily basis. The data are recorded in the document "Rekod Paras Air Di Dalam Kolam" and submitted to the management to be verified. Records were available for verification. The ETP Operators are rotated on night shift basis The bund surrounding all effluent ponds have been raised on (completed 14/05/2022) and verified to have sufficient freeboard as required under DOE Compliance Schedule. The mill has tendered out to desilt the ponds with the heavy solids and the operations will commence in July 2022. <p>Based on the evidence provided and the visit to the mill's effluent pond it was</p>

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	found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 18/05/2022.
Effectiveness Closure (for previous audit closed Critical NC):	Site visit to ETP has confirmed the conditions of effluent is well maintained. The require information in the signage has been put in and freeboard at each Pond (acidification and aerobic ponds) in accordance to the requirement of freeboard in the compliance schedule. No recurrence of issues observed thus the previous major NC is remained closed.

Non-conformity			
NCR Ref #	2179275-202203-M2	Date Issued	18/03/2022
Due Date	16/06/2022	Date of nonconformity Closure	18/05/2022
Clause & Category (Critical / Minor)	3.8.12 (Critical)		
Statement of Nonconformity:	The mill has delivered Mass Balance sales of PK from a negative stock for the period under review (Mar 2021 to Feb 2022). The mass balance accounting have not been updated accordingly.		
Requirement Reference:	Record keeping i) For Mass Balance Module, the mill: a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. 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)		
Objective Evidence:	1. Based on the verification of the mill's mass balance account and sales registered in RSPO PalmTrace for the period under review (Mar 2021 to Feb 2022), it was found that the mill has dispatched 2,593.12 mt of RSPO certified PK more than its stock balance (production and carried forward balance). 2. The mass balance account did not capture the sales of RSPO CPO and PK which was downgraded and sold as conventional products and the sales of RSPO Credits. 3. The mass balance account did not show the correct volume for 'Balance' and 'Carry Forward' for CPO & PK.		
Corrections:	1. Mill management already informed GTM through email to stop immediately the sales of RSPO CSPK to balance the Mass Balance sale to positive stock		

	<p>during period under review.</p> <ol style="list-style-type: none"> To increase certified FFB supply and volume of certified PK to balance the negative stock with indicate over dispatch. To revise the new MB sheet as provided by GSD team which shown the latest formula for volume of 'Balance' and Carry Forward'.
Root Cause Analysis:	<ol style="list-style-type: none"> Overdespatch of sales of RSPO CSPK because of breakdown communication with GTM. Using old template MB Sheet that not include the calculation for PK/CSPK dispatched as conventional and volume for 'Balance' and 'Carry Forward' for CPO and PK are not correct. Monitoring & tracking on SCCS mass balance sheet for RSPO not effective. Insufficient training for PIC for documenting Mass Balance Sheet.
Corrective Actions:	<ol style="list-style-type: none"> PIC to have the SCCS training by GSD on annual basis. To key in MB Sheet and monitoring on monthly basis by SCCS PIC (En. Asrul). PIC will inform management and GSD team if any over dispatch for further action. To communicate with GTM on monthly basis for clarification on MB product sales on Palm Trace.
Assessment Conclusion:	<p><u>Critical NC Verification</u></p> <ol style="list-style-type: none"> Elphil POM have informed Group Trading Marketing (GTM) to stop dispatch of RSPO certified PK. Verified the email dated 19/03/2022 from the mill to GTM. The mill have continuously received FFB from its supply base. The volume of FFB has increased due to the higher crop period which resulted in increase of CPO and PK production. Elphil POM are currently using the newly revised MB Sheet which was provided by GSD. The document was verified to include volume carry forward as well. The mill has planned for SCCS training to be conducted in June 2022 as stated in the Annual Training Programme. <p>Based on the evidence provided and the visit to the mill's effluent pond it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 18/05/2022.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Based on review period from March 2022 to January 2023, there was no oversold CPO and PK based Palmtrace transaction as reported under table 11 & 11A (summary of CPO and PK sold). No recurrence of issues observed thus the previous major NC is remained closed.</p>

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Non-conformity			
NCR Ref #	2179275-202203-N1	Issued Date	18/03/2022
Due Date	27/02/2023	Closure Date	2/3/2023
Indicator & Category (Critical / Minor)	3.3.2 (Minor)		
Statement of Nonconformity:	The mechanism to monitor the implementation of procedures were inadequate.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>Referred to Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results.</p> <ul style="list-style-type: none"> - Upon receiving the complete results, the Head of Operating Unit shall check whether it exceeds, or no not meet the related requirement. If the results are off limit, an investigation shall be initiated to solve the issue. - Arrangement for a re-sampling and analysis of the parameter of concern shall be done concurrently with the investigation and sent to the laboratory within 1 week of receiving the results. <p>The mill monitors the water quality at 3 points which is Sg. Kerdah river, Mill Reservoir and Mill Drain. The Water Analysis Test Report (Report Number: IE103/2022) dated 21/01/2022 was available for verification. The results indicated that the COD and DO did not comply with the Class IIA/IIB of NWQS for natural waterways. The management of the mill have raised a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results on 10/02/2022. Nevertheless, the resampling has not been done as of to date.</p>		
Corrections:	<ol style="list-style-type: none"> 1. Briefing on water sampling procedure and SOP of water quality monitoring by RSQM to PIC (En.Dzul Hakim). 2. Arrange to send re-sampling at 3 points which is Sg. Kerdah river, Mill Reservoir and Mill Drain. 		
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Wrong sampling technique used to collect sample at river point. 2. Insufficient training for PIC on collecting water sampling technique and water sampling procedure 		
Corrective Actions:	<ol style="list-style-type: none"> 1. Annual training on water sampling procedure and SOP of water quality monitoring will be conducted to PIC by RSQM 2. Upon receiving complete result sampling, investigation using CPAR form will be conduct by PIC. The CPAR result will communicate and acknowledge by Mill manager before resampling/communicate with RND department for further action. 3. Any Off Spec result and investigation result summary will be communicate during Mill EPMC meeting. 		
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.		

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Effectiveness Closure (for previous audit closed Critical NC):	No recurrence of issues observed as corrective measure has been taken to ensure the CAR process has been effectively implemented. Thus, the previous minor NC has been closed effectively on 2/3/23. Continuous implementation will be further verified in the next assessment.
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Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: 2179275-202203-I1 (Clause: 6.7.4) The monitoring of expiry date of the clinical items can be further improved.</p> <p>Verification / Follow-up actions: Verified during visit at clinic Elphil Estate, Kinta Kellas Estate and Kamuning Estate, monitoring on expiry date for medicine has been done. Latest record verified was in February 2023. Sample checked at medicine in the clinic, all medicines were valid to use. Further verified for First Aid box in the workstation found all contents in the first aid box were in order.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1306204M1 -5.2.2	Major	5.2.2	24/03/2016	Closed on 07/06/2016
1306204M2 – 6.5.2	Major	6.5.2	24/03/2016	Closed on 19/05/2016
1306204N1 – 4.3.2	Minor	4.3.2	24/03/2016	Closed on 23/03/2017
1306204N2 – 4.4.1	Minor	4.4.1	24/03/2016	Closed on 23/03/2017
1306204N3 – 4.7.5	Minor	4.7.5	24/03/2016	Closed on 23/03/2017
1306204N4 – 6.6.2	Minor	6.6.2	24/03/2016	Closed on 23/03/2017
1453612-201703-M1	Major	4.7.1	23/03/2017	Closed on 09/05/2017
1453612-201703-M2	Major	4.7.2	23/03/2017	Closed on 09/05/2017
1453612-201703-M3	Major	4.7.5	23/03/2017	Closed on 09/05/2017
1453612-201703-M4	Major	4.4.2	23/03/2017	Closed on 09/05/2017
1453612-201703-M5	Major	5.1.1	23/03/2017	Closed on 09/05/2017
1453612-201703-M6	Major	5.3.2	23/03/2017	Closed on 09/05/2017
1453612-201703-M7	Major	6.3.1	23/03/2017	Closed on 09/05/2017
1453612-201703-M8	Major	6.5.2	23/03/2017	Closed on 09/05/2017
1453612-201703-M9	Major	2.1.1	23/03/2017	Closed on 09/05/2017
1453612-201703-N1	Minor	4.7.3	23/03/2017	Closed on 13/03/2018
1453612-201703-N2	Minor	4.7.6	23/03/2017	Closed on 13/03/2018

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1453612-201703-N3	Minor	5.3.3	23/03/2017	Closed on 13/03/2018
1453612-201703-N4	Minor	6.9.3	23/03/2017	Closed on 13/03/2018
1453612-201703-N5	Minor	6.10.3	23/03/2017	Closed on 13/03/2018
1606941-201802-M1	Major	SCCS E.5.1	15/03/2018	Closed on 14/05/2018
1606941-201802-N1	Minor	6.8.3	15/03/2018	Closed on 22/02/2019
1606941-201802-N2	Minor	5.1.2	15/03/2018	Closed on 22/02/2019
1606941-201802-N3	Minor	5.6.1	15/03/2018	Closed on 22/02/2019
1744213-201902-M1	Major	2.1.1	22/02/2019	Closed on 07/05/2019
1744213-201902-M2	Major	6.5.2	22/02/2019	Closed on 07/05/2019
1893075-202003-M1	Critical	6.2.3	13/03/2020	Closed on 05/06/2020
1893075-202003-M2	Critical	6.2.2	13/03/2020	Closed on 05/06/2020
1893075-202003-N1	Minor	7.3.1	13/03/2020	Closed on 19/03/2021
2033660-202103-M1	Critical	7.10.1	19/03/2021	Closed on 18/05/2021
2033660-202103-N1	Minor	2.2.2	19/03/2021	Closed on 18/03/2022
2033660-202103-N2	Minor	3.4.2	19/03/2021	Closed on 18/03/2022
2179275-202203-M1	Critical	2.1.1	18/03/2022	Closed on 18/05/2022
2179275-202203-M2	Critical	3.8.12	18/03/2022	Closed on 18/05/2022
2179275-202203-N1	Minor	3.3.2	18/03/2022	Closed on 2/3/2023
2316980-202302-N1	Minor	7.3.1	02/03/2023	"Open"
2316980-202302-N2	Minor	7.11.3	02/03/2023	"Open"

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Strategic Operating Unit (SOU 3)- Elphil Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Communities	Kg Sri Jaya representatives	Face to face
Contractors	ABC – FFB transporter	Face to face
Internal	Gender committee representatives	Face to face
Internal	Estates and mill workers	Face to face
Government department	SMK Datuk Haji Abdul Wahab	Face to face

Stakeholders comment	
1	<p>Feedbacks: <u>Local village (Kg Sri Jaya) representatives</u></p> <p>The villagers have a very good relationship with the company and has been transparent to the villagers should there be any issues of concern. There has been no undissolved issue so far. The company has also always invited the village representative to attend meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any. In term of contribution, occasionally the company has provided their machinery and manpower to repair or maintain roads and drainage in the village. There are also several villagers who are working for the company.</p> <p>Audit Team verification and response: No further issue.</p>
2	<p>Feedbacks: <u>Contractor (ABC) – FFB transporter</u></p> <p>The contractor has a good relationship with the company where they have been providing the service for many years. The contractor also mentioned that the award of contract was done through fair and unbiased tendering process. The management and staff of the operating units have also been very accommodating should there be any issues of concern. The company has also always invited the contractor’s representative to attend the stakeholder meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any.</p> <p>Audit Team verification and response: No further issue.</p>
3	<p>Feedbacks: <u>Gender committee representatives</u></p> <p>Each of the operating unit has their own gender committee. Among the main objectives of the committee are:</p> <ul style="list-style-type: none"> – To raise awareness, identify and address issues of concerns, opportunities, and areas for improvement for workers especially women – To create a safe community within operations where women can raise issues and concerns at work and in their lives with a focus on zero tolerance to sexual harassment and gender-biased violence

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	<p>The committee is required to plan annual activities to achieve the objectives. Among the important activity planned were briefing/training to female workers/employees on understanding the meaning of sexual harassment and domestic violence and method of reporting should it happen. The management has also been very supportive with the programmes in term of financial, facilities and other resources. Since the last audit, there was no sexual harassment case reported.</p>
	<p>Audit Team verification and response: No further issue.</p>
4	<p>Feedbacks: <u>Field workers (estates and mill)</u></p> <p>The management has been very accommodative to the workers in term of welfare. Safety at the workplace is a top priority imposed by the management. Adequate trainings and free PPE were among the main needs given by the management. With regards to welfare, housing facilities, water & electricity supply were always maintained in good conditions. Workers were also made to understand the mechanism to lodge complaint or grievance should there be any. There has been no issue with regards to delivering the terms & conditions stipulated in the employment contract so far.</p>
	<p>Audit Team verification and response: No further issue.</p>
5	<p>Feedbacks: <u>SMK Datuk Haji Abdul Wahab (Principal & Admin Assistant)</u></p> <p>Relationship between the school and the company has been very good so far. The school has also been invited to attend the stakeholders' consultation as a channel to discuss any issues. In term of contribution, the school has brought their requests up during the stakeholders meeting and the company has included the requests in their social management plan. They were also made to understand the mechanism to lodge complaint or grievance should there be any.</p>
	<p>Audit Team verification and response: No further issue.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable as Elphil Certification Unit Estates have already undergone 2nd cycle of Replanting. Sime Darby have acquired all the land (freehold and lease) from the State of Perak Government.					

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



3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Strategic Operating Unit (SOU 3) - Elphil Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Strategic Operating Unit (SOU 3)- Elphil Palm Oil Mill is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: Sime Darby Plantation Bhd
Company Name: BSI Services (M) Sdn Bhd	Company Name: Sime Darby Plantation Bhd
Title: Lead Auditor	Title: Head, Sustainability Compliance Unit, GSD
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 31/3/2023	Date: 05/05/2023

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	The documents that are specified in the RSPO P&C were made available on site at all the sampled operating units. Among the publicly available documents are land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, summary reports, company policies and continual improvement plans. Reports and policies are accessible at the company’s website: https://www.simedarbyplantation.com/ .	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	All the related information was available in Bahasa Malaysia and English and accessible to the stakeholders upon request.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Should there be any request for information that are specified in the RSPO P&C from any stakeholders, record of request can be maintained in few ways such as Communication Logbook, and filing of correspondence documents e.g., email printout, and letter. There has been no request for information that are specified in the RSPO P&C from any stakeholders since the last assessment.	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 -	Sime Darby Plantation Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, Procedure for External Communication, version 1, issue date 01/11/2008). The procedure has the detail about the process of handling complaints from stakeholders and the time frame for	Complied

		<p>external communication to be dealt with. The time frame to provide feedback is within two weeks of the date of receipt for communication and within one week of the completion of the investigation.</p> <p>The Mill Manager has appointed Mill Assistant Manager as the management system officer to handle any issue related to RSPO/ISCC/SCCS/ISO. Whereas the Estate Managers have appointed the Assistant Managers to be the person in charge for social issues.</p> <p>The last stakeholder consultation meeting was conducted on 09/02/2022 for the certification unit. Among the attendees were smallholders, local communities, government agencies, contractors, and representatives from nearby schools. Feedbacks were recorded in the minutes of meeting and have been incorporated into the social management plan.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The lists of stakeholders were last updated in January 2023 by each operating unit. Generally, the stakeholders are of various categories such as local communities, authorities, contractors, suppliers, FFB suppliers and NGOs to name a few. The lists are completed with the information about nominated representatives, contact numbers and addresses.</p>	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Bhd has addressed its policy for ethical conduct in Code of Business Conduct (COBC) and to be implemented in all business operations and transaction, including recruitment and contracts. The document is publicly available on the company's website. Sime Darby has imposed the implementation of the COBC to all its contractors and vendors by signing the Vendors Integrity Pledge document. Copies of the</p>	Complied

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		signed pledges were kept by all the operating units and made available for verification.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	At the operating unit level, the system to monitor is mainly by regular checking of the contractors' legal compliance and employees' welfare by the management. Apart from that, annual internal audit is also one of the methods to ensure whether the management is monitoring the compliance and implementation of the policy of the counterparties.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	The unit of certification continued to comply with legal requirements. Permits and licenses verified: <u>Elphil POM</u> i) Mill's compliance schedule under license no. 004583, ref: AS(B) AS(B)31/152/000/055 valid from 1/7/22 until 30/6/23. Mill processing capacity is 45 mt/hr using land application for method of POME disposal. Limit of BOD ₃ is 5000 mg/l. ii) 3 rd party environmental audits 1 st half of 2022 – audit date (25/3/2022), report date (25/3/2022) No NC raised. One (1) observation raised. Audit carried out environmental license assessor, EA 0103/CESSWI 4063 2 nd half of 2022 - audit date (14/9/2022), report date (14/9/2022) No NC raised. Two (2) observations raised. Audit carried out environmental license assessor, EA 0103/CESSWI 4063 <u>Elphil Estate</u>	Complied

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		<p>i) MPOB license no. 529849002000, valid from 1/6/22 – 31/05/23 for 2,018.98 ha for selling and transporting FFB.</p> <p>ii) MPOB license no. 563441011000, valid from 1/8/22 – 31/07/23 for 2,018.98 ha for production, selling and moving and storage.</p> <p>iii) Air receiver/compressor CF, PK PMT 6619 valid until 25/10/2023</p> <p>iv) Diesel permit, serial no. A001936, ref: SK/10/B.PGK.KK, storage capacity: 9,000 litre valid from 25/11/20 – 24/11/23</p> <p>v) Permit to deduct wages under Section 24 of Employment Act 1955 for electricity bill payment, ref.: BHG.PU/9/129 JLD 3(53), dated 06/07/2017</p> <p>vi) CF to occupy building under Reg 38(1)(a) of the Workers' Minimum Standards of Housing and Amenities Act 1990, dated 23/02/2012</p> <p>vii) Permit Kebenaran Menggunakan Bekalan Sumber Air Sendiri untuk Ladang Elphil Bah. Plang di bawah Seksyen 6(1)(a), Akta Standard Minimum Perumahan, Penginapan dan Kemudahan Pekerja 1990, #JTK.PK(1)42/16JLD.6(52), validity: 25/10/2021 to 25/10/2023.</p> <p><u>Kamuning Estate</u></p> <p>i) MPOB License no. 524034002000 (Ladang Kamuning), valid until 30/09/2023 for selling and transporting FFB</p> <p>ii) Permit to store diesel, #P: A001953, valid until 17/02/2024</p> <p>iii) Permit to store diesel, #P: A001954, valid until 17/02/2024</p> <p><u>Kinta Kellas Estate</u></p> <p>i) MPOB License no. 528648002000, valid until 31/03/2023</p>	
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		ii) Permit to store diesel & petrol, #P: A003249, valid until 17/07/2024	
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 -	Sime Darby Plantation Berhad has established legal and other requirements register @ LORR to have a list of legal register to ensure compliance is in place. The system has a means to track changes to the laws and regulations. The GSD Department is responsible to track changes and the information was disseminated to all its plantations and mill operation. The newly added laws and regulations as per the following: <ul style="list-style-type: none"> - Employees Social Security (Amendment) Act 2022, date review 26/9/22 - Employment Insurance System (EIS) (Amendment) Act 2022, date review 26/9/22 - Employment Act (Amendment) 2022, date review 6/1/23 	Complied
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	Legal or authorised boundaries are clearly demarcated and visibly maintained as per verification during site visit. Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through construction of trenches and parameter road. This was confirmed through the field visit at Elphil Estate, Kinta Kellas Estate and Kamuning Estate found practiced was clearly visible. Boundary and monthly patrolling record was verified. <u>Elphil Estate</u> Sighted boundary at P99G neighbouring with cattle farm and P10B neighbouring with Government Road. Verified that there is no planting beyond these legal or authorised boundaries.	Complied

		<p><u>Kinta Kellas Estate</u> Sighted boundary at P00D neighbouring with Durian farm and P99B neighbouring with Temple. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Kamuning Estate</u> Sighted boundary at P02C neighbouring with Government Hospital and P12C neighbouring with Smallholder. Verified that there is no planting beyond these legal or authorised boundaries.</p>	
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained. - Minor compliance -</p>	<p>The certification unit had listed all contracted parties and documented in individual operating units' stakeholders list, which was last updated in January 2023. The lists were made available for verification at all the sampled units.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -</p>	<p>All contracted parties/vendors were required to sign Vendor Integrity Pledge (VIP) and to comply with the following requirements: - Vendor Code of Business Conduct (VCOBC) - All applicable laws and regulations related anti-bribery, fraud, and corruption</p> <p>The operating units has carried out legal due diligence of all their contracted parties through internal audits, and performance review. Among the documents and records inspected by the operating units were possession of appropriate licenses/permits and payslips of the employers of the contractors to name a few.</p>	Complied

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2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Generic clauses related to disallowing child, forced, and trafficked labour are available in Vendor Integrity Pledge (VIP). All contracted parties/vendors were required to sign Vendor Integrity Pledge (VIP) and to comply with the following requirements:</p> <ul style="list-style-type: none"> - Vendor Code of Business Conduct (VCOBC) - All applicable laws and regulations related anti-bribery, fraud, and corruption 	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>For directly sourced FFB, information of third party FFB suppliers such as contract agreement, MPOB license, location maps with GPS coordinates information and evidence of ownership kept in specific FFB supplier files.</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>There were several indirectly sourced FFB and the mill is still in the process of collecting the information described in 2.3.1. As to comply with RSPO Announcement dated 15 February 2022 on Interim Measure for Fulfilment of Indicator 2.3.2 of the 2018 RSPO Principles & Criteria On Legality of Indirect FFB Supplies, Sime Darby Plantation Berhad has, case register has been submitted to RSPO on 11/11/2022. 3 main challenges as to obtained land ownership evidence, MPOB license and geo-location for the indirect supplier. Target fulfilment of requirement under 2.3.2 is by November 2023.</p>	Complied
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			

3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Business Plan has been prepared by certification units. Refer Business Plan FY2023-2027 that prepared in December 2022. The business plan covered on:</p> <p>Estates</p> <ol style="list-style-type: none"> 1. Oil Palm – Mature Upkeep 2. Oil Palm – Harvesting & Collection 3. Oil Palm – Transport 4. Estate Admin 5. Labour Overhead 6. Roads & Bridges <p>Mill</p> <ol style="list-style-type: none"> 1. FFB Processed 2. CPO Produced 3. CPK Produced 4. OER 5. KER 	Complied																	
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>SOU 3 Supply Base estates have prepared the replanting programme with minimum of 5 years projection. The review of the programme is done at the end of every year. Below are the details of the programme:</p> <table border="1" data-bbox="1137 1230 1930 1391"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="5">Replanting Program, Ha, For the Year</th> </tr> <tr> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Elphil Estate</td> <td>83.53</td> <td>211.31</td> <td>198.92</td> <td>161.86</td> <td>113.45</td> </tr> </tbody> </table>	Estate	Replanting Program, Ha, For the Year					2023	2024	2025	2026	2027	Elphil Estate	83.53	211.31	198.92	161.86	113.45	Complied
Estate	Replanting Program, Ha, For the Year																			
	2023	2024	2025	2026	2027															
Elphil Estate	83.53	211.31	198.92	161.86	113.45															

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		Kinta Kellas Estate	85.43	205.13	175.36	0.00	0.00	
		Kamuning Estate	195.00	358.00	290.00	318.19	218.00	
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 -	<p>Management Review meeting has been conducted upon internal audit successfully conducted. Among the agenda in the meeting were:</p> <ol style="list-style-type: none"> 1. Introduction by Chairman 2. Results of internal audits covering RSPO SCCS 3. Customer feedback 4. Status of preventive and corrective action 5. Follow up actions from management review 6. Changes that could affect the management system 7. Recommendation for improvement 8. Improvement of the effectiveness of the management system and process 9. Resources needs <p>MRM conducted at certification units as date below: Elphil Estate: 20/12/2022 Elphil POM: 13/12/2022 Kinta Kellas Estate: 12/01/2023 Kamuning Estate: 08/02/2023</p>						Complied

<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Action plan for continuous improvement implemented by individual operating unit within the certification unit based on consideration of the social impacts, which in general includes welfare of employees, and relationship between the relevant stakeholders.</p>	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of SOU3 Elphil Certification Unit's metrics (economic, social and environment). Data reporting period is January to December 2022 for (social and environment metrics) and economic metrics from Feb 2022 – Jan 2023 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	Complied
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) for the estate and mill has been prepared. Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU 3 as a guidance document to conduct estate operation. The estates also hold the Safety Work Procedure. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation etc.</p> <p>Palm Oil Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP</p>	Complied

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		<p>and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, Sime Darby has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. Sime Darby continuously updated the SOP established. Among the updated SOP FY 2022/2023 as follows:</p> <ol style="list-style-type: none"> 1. UM HSE Management System Manual, UM/HSE/MS/01 2. First Aid in Workplace Procedure, UM/HSE/OCP/01 3. Safety Harvesting Procedure, UM/HSE/OCP/02 4. Personal Protective Equipment Procedure, UM/HSE/OCP/03 5. Chemical Safety Management Procedure, UM/HSE/OCP/04 6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05 7. OSH Risk Management Procedure, UM/HSE/SE/01 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>A mechanism on checking the consistency of estate and mill implementation of their procedures were in place. Among the mechanism such as Performance Monitoring Visit, SORA/SCRA visit, Agronomist visit and Internal Audit.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit. Reviewed the monitoring records as follows:</p> <p><u>Elphil Estate</u></p> <ol style="list-style-type: none"> 1. Internal Audit dated 13/12/2022 2. Performance Monitoring Visit Summary dated 01/12/2022. 3. Estate Structured Crop Recovery Assessment Report dated 22/11 – 02/12/2022 	Complied

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		<p>4. Plantation Advisory Report dated 27/01/2019.</p> <p><u>Elphil POM</u></p> <ol style="list-style-type: none"> 1. Structured Oil Recovery Assessment (SORA) dated 29/11-02/12/2022. 2. Internal Audit Report dated 12/12/2022. <p><u>Kinta Kellas Estate</u></p> <ol style="list-style-type: none"> 1. Internal Audit dated 15/12/2022. 2. Performance Monitoring Visit Summary dated 02/12/2022. 3. Estate Structured Crop Recovery Assessment Report dated 25/11/2022. 4. Estate Mature Upkeep Assessment Report dated 25/11/2022. 5. Agronomist Visit dated 09/02/2023. <p><u>Kamuning Estate</u></p> <ol style="list-style-type: none"> 1. Internal Audit dated 14/12/2022. 2. Estate Structured Crop Recovery Assessment Report dated 22-23/11/2022. 3. Estate Mature Upkeep Assessment Report dated 22-23/11/2022. 	
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected</p>	<p>There was no new planting or new operation reported in the sampled estates. SIA was conducted on 24 – 27/08/2015 for SOU 3 Elphil POM & supply bases by the Social & Environment Projects Unit, PSQM Department. Among the methods used in the</p>	Complied

	<p>stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>assessment were interviews with stakeholders, site observations and documentation reviews. The assessment had covered the affected stakeholders such as contractors, government authorities, local communities, and workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety & health, living condition, infrastructure and amenities and stakeholder engagement were taken into consideration in the assessment.</p> <p>There are no new plantings or operations within SOU3 Elphil. For existing operation, identification and evaluation of impact assessments relating to environmental impacts based on documents verified as following:</p> <ul style="list-style-type: none"> a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register b) Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI c) Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE. <p>There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. Mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered. Latest review of EIE was carried out on 13/12/2022 for Elphil Estate.</p> <p>The mill and estates has continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and Assistant Managers of mill and estate were identified as person-incharge of the programs which</p>	
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		were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were made annually if there's no any new activity within respective sites.	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance -	For existing operation, the social impact management plans were developed and updated from time to time by the operating units. The updating of the management plan was based feedbacks and issues collected during various of meeting such as stakeholder meeting, social dialogue session, OSH meeting, trade union meeting, and complaint book to name a few. Each operating units under SOU3 Elphil has established an environmental management plan for FY 2022/2023. It mentioned the objectives, category, action, frequency, person in charge and monitoring period. Development of the management plan is based on result of the aspect and impact analysis for all the mill/estate operations. For example the management plan revised annually and the recent review was in January 2023 for FY 2023. In the report, the study of aspect and impact are aimed to; <ul style="list-style-type: none"> a) Plan to avoid negative impact and to promote positive impacts. b) Reduction disposal of waste taking into consideration of social responsibilities. c) Plan to reduce pollution and release of GHG d) Development and implementations. 	Complied
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 -	Among the information available in the social impact management plans was objectives, feedbacks/issues, actions to be taken, timeframe, and persons in-charge. The progress of the actions was monitored and regularly updated. Generally, among the objectives of the social management plan were: - To address the issues raised in various platforms, e.g., stray	Complied

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		<p>dogs, approval to grow vegetables and poultry, recreation & welfare, road maintenance & safety, cattle intrusion</p> <ul style="list-style-type: none"> - To review social impacts and to implement plans to mitigate the negative impacts and promote the positive ones, e.g., engagement with relevant stakeholders - To ensure compliance with SOP and legal requirements regarding social, e.g., appointment of PIC/committee to handle social issues, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor's workers, to maintain housing and facilities provided to workers - To contribute to local communities' development, e.g., monetary/non-monetary <p>On the environmental management and monitoring plan, the annual revised plan has included the following:</p> <ul style="list-style-type: none"> a) Plan to avoid negative impact and to promote positive impacts. b) Reduction disposal of waste taking into consideration of social responsibilities. c) Plan to reduce pollution and release of GHG d) Development and implementations. 	
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The Human Resource Department in SDP HQ has established SOP for Hiring of Local Workers dated 01/12/2019 and Workforce Management Unit Liaison & Recruitment Standard Operating Process & Procedures (SOPP) (Doc. No.: WMU/LR-SOPP/DEC2017/R3, Rev. 3 dated 15/12/2017) to explain the recruitment processes for both local and foreign workers. The</p>	<p>Complied</p>

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		recruitment of foreign workers will be carried out by the Workforce Management Unit and HR.	
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Recruitment of workers is carried out by SDPB's Workforce Management Unit at HQ level. At the operating units, application forms, interview assessment form, medical check-up report, copy of identification documents and employment contract for newly recruited employees were made available for verification. These are among the pre-requisites spelt out in the recruitment procedure.	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	<p>All operations were risk assessed to identify H&S issues in the estate and mill. Mitigation plans and procedures were documented and implemented as verified below.</p> <p><u>Elphil POM</u></p> <ol style="list-style-type: none"> 1. The Mill had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, HIRARC is subject for a review in event of the following Change in work process, Revision/changes in legislative requirement and Occurrence of accidents. Latest reviewed was conducted on 30/11/2022. 2. Chemical Hazard and Risk Assessment (CHRA) has been conducted on 25/08/2020 by GATCONST Sdn Bhd with report reference number HQ/09/ASS/00/124-2020/0033. 3. Medical Surveillance has been conducted on 31/01/2023 for 1 worker and 21/12/2022 for 23 workers by Klinik Tweedie. A total of 23 workers were examined and none of them got 	Complied

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		<p>abnormal results or recommended for removal. All workers tested was fit to work.</p> <ol style="list-style-type: none"> 4. Noise Risk Assessment (NRA) has been conducted on 21&22/12/2020 by SH Safety Consultancy Sdn Bhd. 5. Audiometric test has been conducted as per NRA recommendation dated 04/01/2022 by Procoma Environmental (M) Sdn Bhd. A total of 72 workers were examined and result indicates that 59 of them have normal hearing, 13 workers with abnormal audiogram and fall under Standard Threshold Shift (STS). 13 workers has been re test for Audiometric Test dated 30/01/2023 and result was yet to received. 6. Workplace Inspection has been conducted on quarterly basis. Sample inspection record on 12/12/2022. <p><u>Elphil Estate</u></p> <ol style="list-style-type: none"> 1. The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, HIRARC is subject for a review in event of the following Change in work process, Revision/changes in legislative requirement and Occurrence of accidents. Latest reviewed was conducted on 17/11/2022. 2. Chemical Hazard and Risk Assessment (CHRA) has been conducted on 27/08/2020 by GATCONST Sdn Bhd with report reference number HQ/09/ASS/00/124-2020/0035. 3. Medical Surveillance has been conducted on 31/01/2023 for 1 worker and 06/06/2022 for 7 workers by Klinik Tweedie. A total of 7 workers were examined and none of them got 	
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		<p>abnormal results or recommended for removal. All workers tested was fit to work.</p> <ol style="list-style-type: none"> 4. Noise Risk Assessment (NRA) has been conducted on 26/06/2020 by SH Safety Consultancy Sdn Bhd. 5. Audiometric test has been conducted as per NRA recommendation dated 15/12/2022 by Procoma Environmental (M) Sdn Bhd. A total of 2 workers were examined and result indicates that None of them have normal hearing, 2 workers with abnormal audiogram and fall under Standard Threshold Shift (STS). Arrangement for the retest has been communicated as per email dated 23/02/2022 6. Workplace Inspection has been conducted on quarterly basis. Sample inspection record on 06/12/2022. <p><u>Kinta Kellas Estate</u></p> <ol style="list-style-type: none"> 1. The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, HIRARC is subject for a review in event of the following Change in work process, Revision/changes in legislative requirement and Occurrence of accidents. Latest reviewed was conducted on 12/10/2022. 2. Chemical Hazard and Risk Assessment (CHRA) has been conducted on 24/08/2020 by GATCONST Sdn Bhd with report reference number HQ/09/ASS/00/124-2020/0032. 3. Medical Surveillance has been conducted on 16/05/2022 for 1 worker and 06/06/2022 for 6 workers by Klinik Edina. A total of 6 workers were examined and none of them got abnormal 	
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		<p>results or recommended for removal. All workers tested was fit to work.</p> <ol style="list-style-type: none"> 4. Noise Risk Assessment (NRA) has been conducted on 25/06/2020 by SH Safety Consultancy Sdn Bhd. 5. Audiometric test has been conducted as per NRA recommendation dated 18/04/2022 by Procoma Environmental (M) Sdn Bhd. A total of 2 workers were examined and result indicates that 1 of them have normal hearing, 1 worker with abnormal audiogram and fall under Standard Threshold Shift (STS). Re test has been conducted as per recommended by the assessor. 6. Workplace Inspection has been conducted on quarterly basis. Sample inspection record on 06/12/2022. <p><u>Kamuning Estate</u></p> <ol style="list-style-type: none"> 1. The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, HIRARC is subject for a review in event of the following Change in work process, Revision/changes in legislative requirement and Occurrence of accidents. Latest reviewed was conducted on 12/10/2022. 2. Chemical Hazard and Risk Assessment (CHRA) has been conducted on 26/08/2020 by GATCONST Sdn Bhd with report reference number HQ/09/ASS/00/124-2020/0034. 3. Medical Surveillance has been conducted on 16/02/2023 for 15 workers by Klinik Tweedie. A total of 15 workers were examined and none of them got abnormal results or recommended for removal. All workers tested was fit to work. 	
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		<p>4. Noise Risk Assessment (NRA) has been conducted on 26/06/2020 by SH Safety Consultancy Sdn Bhd.</p> <p>5. Audiometric test has been conducted as per NRA recommendation dated 18/04/2022 by Procoma Environmental (M) Sdn Bhd. A total of 6 workers were examined and result indicates that 2 workers have normal hearing, 4 workers with abnormal audiogram and fall under Standard Threshold Shift (STS). Restest has been conducted for respective workers.</p> <p>Workplace Inspection has been conducted on quarterly basis. Sample inspection record on 07/12/2022.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>Refer Occupational Safety & Health Plan for the year 2023 that has been prepared by certification units. Among the management discussed were:</p> <ol style="list-style-type: none"> 1. OSH Risk Management 2. OSH Structure 3. Incident Reporting 4. Emergency Preparedness & Response 5. Chemical Safety Management 6. Contractor Safety Management 7. Vehicle & Machinery safety Management 8. Communication 9. Inspection 10. Health and Hygiene Monitoring program 11. Awareness, competency & Training 	Complied

		<p>12. Reporting</p> <p>The effectiveness of the plans was monitored in many ways such as:</p> <ul style="list-style-type: none"> • Internal audit • Workplace inspection (including field supervision) • Accident & incident reporting • Medical surveillance • Chemical exposure monitoring • Audiometric test • LEV performance monitoring (fume hood) 	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units visited has conducted training need analysis for all employee, management, and contractors. The need analysis was conducted based on the job designation and training required by the job type. Trainings was identified for management, employee and contractors and programmed throughout FY 2022/2023. The training identified covers the safety and health, environmental and social aspect.</p> <p>Means implemented by certification units were to assess understanding of participants include:</p> <ul style="list-style-type: none"> • Participants completing post-training evaluation/feedback form and give suggestions. 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended. <p>Random interviews with workers showed that they understood what RSPO is, the several subsidiaries’ policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, etc.</p> <p>The annual training program 2022/2023 has been established and significantly covers all aspects of the RSPO requirements. There were also additional subjects including the estate operating procedures, parameters, vehicles maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects.</p>															
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of trainings were maintained by the Mill and all estates as below: -</p> <p><u>Elphil Estate</u></p> <table border="1" data-bbox="1153 976 1926 1380"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>First Aid Training</td> <td>24/02/2023</td> </tr> <tr> <td>SDS Briefing</td> <td>21/01/2023</td> </tr> <tr> <td>HIRARC Briefing</td> <td>16/02/2023</td> </tr> <tr> <td>Policy Briefing</td> <td>08/02/2023</td> </tr> <tr> <td>Safety Briefing for Tractor Driver</td> <td>30/01/2023</td> </tr> <tr> <td>Grievance and Safe Working Procedure</td> <td>25/01/2023</td> </tr> </tbody> </table>	Training	Date	First Aid Training	24/02/2023	SDS Briefing	21/01/2023	HIRARC Briefing	16/02/2023	Policy Briefing	08/02/2023	Safety Briefing for Tractor Driver	30/01/2023	Grievance and Safe Working Procedure	25/01/2023	Complied
Training	Date																
First Aid Training	24/02/2023																
SDS Briefing	21/01/2023																
HIRARC Briefing	16/02/2023																
Policy Briefing	08/02/2023																
Safety Briefing for Tractor Driver	30/01/2023																
Grievance and Safe Working Procedure	25/01/2023																

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		Chemical handling	16/02/2023	
		NRA & Audiometric	18/04/2022	
		Fire Drill Training	23/02/2023	
		<u>Elphil POM</u>		
		Training	Date	
		Backhoe JCB Training	11/12/2022	
		First Aid Training	19/12/2022	
		Hearing Conservation & NRA	23/02/2023	
		Safety Harness for AP	19/12/2022	
		Chemical handling	12/02/2023	
		Fire Drill Training	12/09/2022	
		SAP TPM Training	22/02/2023	
		HIRARC Training	27/05/2022	
		RSPO & Policy Training	16/01/2023	
		<u>Kinta Kellas Estate</u>		
		Training	Date	

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		HSE Alert Training	13/02/2023	
		Harvester Training & Eye Protection	08/02/2023	
		RSPO & Policy Training	06/02/2023	
		Safety Driver and Workshop	22/12/2022	
		Spraying Technique Training	28/09/2022	
		Medical Access Training	28/10/2022	
		PPE Training	03/11/2022	
		First Aid Training	10/03/2022	
		Fire Drill Training	16/12/2022	
		<u>Kamuning Estate</u>		
		Training	Date	
		Fire Drill Training	24/02/2023	
		Chemical Handling	22/02/2023	
		PPE and Spraying Training	22/02/2023	
		IPM Training	22/02/2023	
		First Aid Training	15/02/2023	
		Safety Riding Motorbike	24/12/2022	

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		Safety and PPE Harvesting	04/01/2023	
		PPE & Inter pump Training	04/10/2022	
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 -	The last training on supply chain was conducted on 9/2/2023 at meeting room Elphil POM. It was conducted by the Sustainability Department and attended by 11 participants from various departments of the mill such as management, security, supervisors, weighbridge, laboratory and transporter.		Complied
Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)				
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.	Not applicable. Elphil POM currently under mass balance module.		Not Applicable
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	SOU 3 Elphil POM receives and processes certified FFB from its own supply base and outside crop producer (OCP). All OCP crop received are non-RSPO certified FFB. Therefore, the mill has opted for Mass Balance module.		Complied

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3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. (Table 10)	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The registration of PalmTrace will be carried out by the GSD Department. All transaction will be registered in the PalmTrace. Elphil POM registered license available in PalmTrace as following: <ul style="list-style-type: none"> - Member ID: RSPO_PO1000000191 - Member category: Oil Mill - RSPO Membership No.: 1-0008-04-000-00 - License Status: Expires on 17/06/2023 	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). 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.	Procedure namely Sime Darby Plantation Berhad – Sustainable Supply Chain and Traceability Procedure; document ID: SD/SDP/GSD/SCCS/0522/01, version:01 dated May 2022. The procedure was established which covers responsibility, reporting of certified CPO/PK, non-conformance material and documents, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc. The Mill Manager as Head of Operating Unit has the overall responsibility for the implementation of SOP, and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Sighted the identified and assigned suitable employees to implement and maintain the traceability system by management. Appointment letter dated 9/2/2022 was verified.	Complied

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	<p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>The procedures for receiving and processing certified and non-certified FFBs are documented in the Sime Darby Plantation – Sustainable Supply Chain and Traceability Procedure; document ID: SD/SDP/GSD/SCCS/0522/01, version:01 dated May 2022.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Addressed in Sustainable Supply Chain and Traceability Procedure, version no:1 approved on May 2022 (SD/SDP/GSD/SCCS/0522/01) under section 18.0 Internal Audit procedure. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Additional procedure for internal audit process ref, SDP/GSD/SCU/IAP, rev:3 dated 31/01/23 was recently developed as guidance procedure for internal audit.</p> <p>Combined internal audit for supply chain was last conducted on 12/12/2022 by 3 internal auditors from Group Sustainability and Quality Management Department.</p> <p>The results of Internal Audit were discussed in the Management Review Meeting as sighted in minutes meeting conducted on 13/12/2022.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>i)The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate’s ticket number is recorded in the mill’s ticket number.</p> <p>Sample of weighbridge ticket checked: WB ticket Number: 163424, Estate’s DO: 20329 Supplier: E142 – Kinta Kellas Estate Date of delivery: 9/02/23 Weight/truck/field/bunches: 12.79 mt/AJD4595K07/2014A/912</p>	<p>Complied</p>

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		<p>RSPO certificate no.: RSPO 550180</p> <p>WB ticket Number: 157881, Estate’s DO: 018522 Supplier: E256 – Kamuning Estate Date of delivery: 26/8/2022 Weight/truck/field/bunches: 10.57 mt/AHY7968S07/2001F1/518 RSPO certificate no.: RSPO 550180</p> <p>ii) There has been no projected overproduction during the period under reviewed. Nonetheless, based on interview with the staff, the facility is aware of this requirement</p> <p>iii) Handling of non-conforming FFB and/or documents is addressed in the Sustainable Supply Chain and Traceability Procedure, version no:1 approved on May 2022 (SD/SDP/GSD/SCCS/0522/01) under 11.0 non-conforming products and Document.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; 	<p>Elphil POM ensured the required information is available in document form. Based on sampled contracts [i.e., S/C-PSD/2202/PKO109 the following information was available:</p> <p>CSPK (contract no. S/C-PSD/2202/PKO109)</p> <ul style="list-style-type: none"> • The name and address of the buyer – confidential • The name and address of the seller – KKS Elphil • The loading or shipment/ delivery date: February 2022 • The date on which the documents were issued, 15/2/2022, dispatch ticket no. 020513 • A description of the product, including the applicable supply chain model, e.g. “RSPO CSPK MB” • The quantity of the products delivered: 42.86 mt • Related transport documentation, e.g. dispatch ticket no. 020513 • Supply chain certificate number of the seller: RSPO 550180 	<p>Complied</p>

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	<ul style="list-style-type: none"> f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> • A unique identification numbers - available in a few forms e.g. DN no., seal no., etc. 	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 	<p>No FFB and/or oil palm products processing outsource by Elphil POM except for CPO delivery transportation only. The mill adapted Sime Darby established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability Procedure, doc. ID: SD/SDP/GSD/SCCS/0522/01 ver. 1 dated 1st June 2022, Section 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>The list of outsourced contractors was registered in List of Stakeholder records that CPO transporter as per sighted contract agreement as following:</p> <p>XYZ Sdn Bhd; Transportation of Crude Palm Oil ("CPO") (Service) for Sime Darby Plantation Berhad's Peninsular Malaysia's Oil Mills – Letter of Award (LOA); Reference Number: T/SDPB/PEN/CPO/0720/003; Dated: 12/12/2020; Contract period valid for 3 years from 01/11/2020 – 31/10/2023.</p>	<p>Complied</p>

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		<p>The Letter of Award is used as the documented control system that states all procedures and processes which is bound by the contractor.</p> <p>Stated under section 5(d)(iii), 'permit the CB appointed by the company to conduct audit on its or its sub-contractors' operations and provide access to all relevant systems, documents and records when requested by the CB.</p>	
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.	No FFB and/or oil palm products processing outsource by Elphil POM except for CPO delivery transportation only. For PK, transportation arranged by buyer to the KCP. The list of outsourced contractors was registered in List of Stakeholder records that included the CPO transporter.	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.	<p>Sime Darby has issued Memorandum to all contractors dated 26/6/2019. In the memorandum stated the contractors have to comply as follows.</p> <ol style="list-style-type: none"> 1. Comply with local legal requirements 2. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company 3. Having signed and enforceable agreement with the company 4. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary 5. Having related working permits <p>Ensure PPE utilization by contractors' employee while being in the company premise.</p>	Complied
3.8.12	Record keeping	i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate,	Complied

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	<ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<p>complete, up-to-date, and accessible. Related purchasing goods in and sales good out report in the earlier indicator under 3.8.7 and 3.8.8.</p> <ul style="list-style-type: none"> ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability Procedure, doc. ID: SD/SDP/GSD/SCCS/0522/01 ver. 1 dated 1st June 2022. iii) NA as the mill is using MB model iv) All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded on a three-monthly basis in the mill’s mass balance accounting sheet. The data was mostly sourced from the mill’s Daily Production Report. Based on verification of the MB accounting sheet, there was no short selling made since the last assessment. 	
<p>3.8.13</p>	<p>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.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER.</p>	<p>Complied</p>
<p>3.8.14</p>	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	<p>Complied</p>

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3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	NA as the mill is under Mass Balance module.	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Sampling a per record below:-</p> <p>Transaction ID; TR-f625a5d3-f68c Shipping date: 28/2/2022 Announcement date: 9/3/2022</p> <p>RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Elphil POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc). Thus, this indicator is not applicable	Not Applicable
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status	Not applicable as no off-product claim made by Elphil POM as to date.	Not Applicable

	<p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>		
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 Elphil POM as to date.	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Not applicable as no off-product claim made by Elphil POM as to date.	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Elphil POM as verified through documentations and websites.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (CPO/Palm Kernel RSPO MB) and RSPO certificate number.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:	Elphil POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable

	<p>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.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Oil palm content is 100% CPO and claim as RSPO MB-certified.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Non-certified FFB comes from external crop and since Elphil POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: ‘Certified sustainable palm oil’. The RSPO label MUST contain the tag ‘MIXED’. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and 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. 	Elphil POM does not use the RSPO label in its product (CPO & PK).	Complied

	<ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>No evidence of storytelling in product related communication. Hence, this requirement is not applicable</p>	<p>Not Applicable</p>
Principle 4: Respect community and human rights and deliver benefits			

Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spelt out in the Human Rights Charter (HRC). The HRC was last revised in August 2020. They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, the company is committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration, and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Apart from posting on the company's website, the policy was communicated to the stakeholders mainly through stakeholder meetings and workers' routine musters.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation prohibits any form of violence or harassment in their operation as per the above-mentioned policies. Based on interview with sampled workers and gender committee representatives, there has been no case reported with regards to violence and harassment. Should there be any such case, it can be addressed in accordance with the Sime Darby Plantation Berhad's Standard Operating Procedure of Suara Kami Helpline, dated 15/04/2020.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			

4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter, which was last revised in 2020, where the company believes everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistleblowers, complainants, and community spokespersons play by lodging complaints in confidence.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/11/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after the issue is reported, which involves the disputed parties, zone heads, third parties and stakeholders.</p> <p>Apart from that, the company is implementing "Suara Kami Helpline" as a platform for the workers to raise any issue. The SOP for "Suara Kami Helpline" dated 15/04/2020 that explains the procedure of using the helpline is available on the company's website. The procedure had been communicated to the employees mainly through briefing on morning muster and display of the procedure on several notice boards. Interview with the sampled workers confirmed that they were aware of the helpline.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Sime Darby has developed its own online complaint platform called Oil Palm Pal (OPP) for workers to utilised using their smartphones. The complaints will then be registered in an online tracking system/OPP dashboard. Among the information available in the system is details of complaints, name of complainant, action to be taken and timeframe. Complaint/Suggestion Form (Internal & External) and Housing Defect Complaint Form were also still in use to record any complaints from internal and external stakeholders.</p>	Complied

		This enables the management to record the complaints and monitor its action progress. A meeting call Social Dialogue Meeting is also conducted every fortnightly between the management and the workers representatives. The outcome from the Social Dialogue Meeting are registered in the Social Dialogue Tracking System	
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 -	Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/11/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after the issue is reported, which involves the disputed parties, zone heads, third parties and stakeholders. Apart from that, the company is implementing "Suara Kami Helpline" as a platform for the workers to raise any issue. Verified the SOP for "Suara Kami Helpline" dated 15/04/2020 that explains the procedure of using the helpline. The procedure had been communicated to the employees mainly through morning muster and display of the procedure on several notice boards.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	The certification unit obtained the information about any potential contribution mainly through stakeholders' consultation meetings or written request. Among the contribution requested by the community are as follows: - Maintenance and upgrading of facilities such as football field, and assembly square at some of the surrounding schools - Permission to use the estate's premise for cycling activity organised by the District Council - Road maintenance at the nearby village - Providing manpower to sanitize the police shooting range	Complied

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		The CU has updated the progress of the above contribution in their Social Management Plan. Based on the status reported coupled with verification with the concerned stakeholders, the progress has been completely delivered.	
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	Elphil POM is situated in the land of Elphil Estate under Land Title# XXXXX and #YYYYY. A copy of the land title was kept in the mill office. Elphil Estate has 21 land titles with a total area of 1,879.3778 Ha, Kinta Kellas Estate has 60 land titles with a total area of 1,060.74 Ha, and Kamuning Estate has 52 land titles with a total area of 3,904.3835 Ha. All the copy of land titles were made available for verification.	Complied
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior, and informed consent (FPIC) process to any new developed.</p> <p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.</p>	Complied
4.4.2a	<p>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.</p> <p>- Minor compliance -</p>	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	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 -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	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 -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Complied

Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
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 -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
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 -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
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 -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied

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 -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
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 -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and	Complied

		distribution to the affected parties will be determined by Land Management Department.	
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 -	Addressed in the SOP as mentioned in Indicator 4.6.1.	Complied
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 -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied

4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	Addressed in the SOP as mentioned in Indicator 4.7.1.	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	There was no community that had lost access and rights to land as well as no expansion of plantation by the certification unit.	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use</p>	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied

	rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -		
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 -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region. As the mill is using MB module, the mill received both certified and non-certified FFB. Nonetheless, with regards to non-certified FFB, the suppliers are only those from plantations and collection centres. The FFB supplier were listed in the Elphil POM FFB Supplier list.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Those who are interested in selling their FFB to the mill must apply to the Outside Crop Purchasing unit located at HQ, Kuala Lumpur. The unit will then make a due diligence by obtaining legal documents and site visit of the applicant's plantation before granting the approval. Along this process, the unit will have an informal discussion to explain the pricing mechanism. If both parties agree, a contract agreement will then be issued which normally valid for one year.	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 -	The FFB pricing was stated in Section 8 of the contract, Pricing of FFB under Third Schedule. The calculation method of the pricing was basically influenced by MPOB market price. Verification of the contract agreements showed that all the FFB suppliers have agreed with the pricing through signing.	Complied

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5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	No binding contract between the mill and out-growers which includes finance, loans/credit, and repayment through FFB price reduction for replanting and/or other support mechanisms. Thus, this indicator is not applicable.	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	Verification of the terms and conditions of the sampled contracts showed that the contracts were fair, legal, and made transparent to the contractors. The agreed timeframe of the contract was stated under Section 7 of the contract.	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	Payments are broken down as defined under the First Schedule/Attachment 1 of the agreed contract. The payments were handled at HQ level and based on verification of the payment vouchers; the payments were made on timely manner.	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	Weighbridges were calibrated annually, and evidence of calibration certificates were available with the following details: i) Serial no. C016301909, receipt no. D163396 ii) Serial no. 01264406 KK, receipt no. D163395 Both weighbridges were calibrated on 20/10/2022.	Complied
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	NA as no independent smallholders within the certification unit.	Not Applicable
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p>	NA as no independent smallholders within the certification unit.	Not Applicable

	- Critical (Major) compliance -		
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	NA as the mill does not receive FFB from any smallholders.	Not Applicable
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 -	NA as the mill does not receive FFB from any smallholders.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	NA as the mill does not receive FFB from any smallholders.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	NA as the mill does not receive FFB from any smallholders.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	NA as the mill does not receive FFB from any smallholders.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic	Sime Darby Plantation has developed Human Rights Charter to ensure decent work for all workers means providing equal	Complied

	<p>origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation, or age. They will facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy can be downloaded from https://simedarbyplantation.com/sustainability/reports-policies-and-statements/ .</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interview with the workers from different gender and nationalities, it was confirmed that there was no discrimination reported. The management has treated all employees equally for example in term of providing accommodation, medical treatment, job opportunity, wages rate, etc. There was also no charging of recruitment fees incurred for foreign workers.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has developed a Promotion for Employees (Doc. No.: SDP/HRUM/2020/SOP01 dated 01/01/2020) and Career Progression for Workers Level (both local and foreign workers), (Doc. No.: SDP/HRUM/2020/SOP01) to provide a guideline on promotion process to ensure all employees are given fair and equal opportunity based on the set requirements such as work performance and suitability of the position.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Based on interview with female employees at the sampled operating units, it was confirmed that there is no requirement for pregnancy testing to be conducted prior the employment.</p>	Complied

6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>A combined Gender Committee was established for all the operating units. The committee organizes a meeting every two months. The last meeting was conducted on 11/02/2023 and minutes of meeting were made available for verification. So far, there has been no issue raised by the female workers as verified from the feedback forms and minutes of meeting. Based on interview with the Gender Committee representatives at all the operating units, it was confirmed that there has been no case of sexual harassment or violence reported.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Based on the sampled payslips, which consists of both genders, it was noted that workers were paid equally for the same job scope. They were paid according to the Minimum Wage Order 2022 without any form of discrimination. This was also evident through interview with sampled workers.</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Bhd has signed the Collective Agreement (For field/ oil palm harvesters/oil mill and other general employees) with NUPW [MAPA circular No. 12/2019, dated 02/04/2019]. Employment contract was established based on the collective agreement and available in all languages of which the workers are from. Samples of employment contracts were reviewed and found that the agreements were signed by the employees. Any new foreign workers will be inducted for the terms and conditions of employment contract and briefed on the company's policies, upon arrival to the operating units. The implementation of this practice was evident through interview with the sampled workers.</p>	Complied
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions,</p>	<p>Based on sampled employment contracts the contracts were signed in dual language which is English and their home country language</p>	Complied

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	<p>overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>such as Indonesia/Bangladesh/India. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract. The extension contract has outlined the terms and condition according to the MAPA/NUPW collective agreement, and Minimum Wage Order 2022.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>39 samples for workers' pay slips from various operations such as mill operators, harvester, field workers and general workers were verified. Overtimes were found to be appropriate according to the turn-out records such as check rolls and punch cards. Deductions such as EPF, SOCSO, union membership, and electricity were made fairly as per employment contract and no breach to the Labour Department's Permit to Deduct Wages.</p>	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Workers are accommodated at the housing complex quarters of the operating units without any charges. Housing units were furnished with basic furniture, free water supply, and subsidised electricity. Sport facilities such as football field and courts were also provided within the housing vicinity and well maintained. Should there be any medical treatment needed, clinics, manned by qualified medical officers, were provided. Housing inspection was conducted weekly by the appointed PIC using the Housing Complex/ Nest/ Community Hall Weekly Inspection Checklists (PIOA). Verification of the checklist during the quarters visit showed that the inspections were appropriately conducted, and any shortcoming found, was acted upon.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There was no issue on accessibility to adequate and sufficient food supplies as sundry shops were available in most of the housing complex. Workers are also free to go to the nearby towns for more options of groceries. There has been no complaint received with</p>	Complied

		regards to the price of supplies. Based on interview, the basic supplies were affordable.	
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO</i></p>	<p>The certification unit has provided decent living wage for both local and foreign workers based on SDPB’s prevailing wages assessment. Among the items included in the calculation were wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, and welfare, to name a few. Review of sampled pay slips and prevailing wage assessment report showed that the wages received complied with the Minimum Wage Order 2022.</p>	Complied

	<p>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).</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>Based on verification of employee master list, site observations, and contract agreements of contractors, all the core works are performed by permanent and full-time employees. There is no temporary or casual worker hired.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Human Rights Charter where they respect Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, they will provide alternative means of employee engagement and grievance redressal. The policy has been communicated to the workers through musters and display on notice boards.</p>	Complied

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6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Union Committee was established in the certification unit. The last meeting was conducted on 16/02/2022 with the management and workers’ representatives from all operating units. Issues raised during the meeting were recorded in the minutes of meeting which was made available for verification. Social management plan was thereafter developed to set up the actions to be taken to resolve the issues raised during the meeting.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Interview with the NUPW representatives and the workers confirmed that the election of the representatives were freely done by the workers without any influence or interference from the management.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. They are eradicating the child labour in all their supply chain by promoting no employment of anyone under the age of 18 years.</p> <p>All the contractors are required to read through Vendor COBC before signing the Vendor Integrity Pledge where they are be required to comply with labour and respect human rights. The contractors had also been briefed on the human right charter and prohibition of child labour. This was also confirmed with the stakeholders through consultation session.</p>	Complied

6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The SDPB’s Workforce Management Unit has developed SOPP under Clause 3.1.14 LR14 – Recruitment Drive where the minimum age to be recruited is 18 years old. Age screening is based on the date of birth information stated in the identification document or passport. The local employees must submit a photocopy of identification card during application of job to the management for verification purpose. The screening procedure was spelt out in the SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liaison & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Through verification of employee master lists which have the information about date of birth and date of joining, and interviews with sampled workers, there was no young persons hired.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its ‘no child labour’ policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders. This had also been confirmed through interview with the stakeholders and contractors.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. The policy has been communicated to the workers through musters, trainings and display on notice boards.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter which was last revised in 2020. The company has a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human</p>	Complied

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		Rights and the United Nations Guiding Principles on Business and Human Rights. The company facilitates opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy has been communicated to the workers through musters and display on notice boards.	
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 -	Assessment for new mothers (with infants under 24 months) FY2023 were conducted by each operating unit medical assistant. Based on verification of the assessment report and interviews, among the needs identified were time allocated during working hours for breastfeeding and regular visits to clinics. The management had granted the identified needs to the new mothers.	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 -	Sime Darby Plantation Berhad has maintained the Terms of Reference for Gender Representative and Gender Committee (Bidang Tugas untuk Wakil Jantina dan Jawatankuasa Jantina) dated March 2021 where the committee will be on SOU basis instead of operating unit. The objective of the gender committee is to improve awareness, identify opportunity and improvement and issue of the workers specifically on women. The committee will act as the mechanism to monitor and investigate if there is any sexual harassment, domestic violence, and abusive children in the operating unit. The frequency of the meeting is once in two months. Apart from that, flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Apart from that, the company has implemented "Suara Kami Helpline" as a platform for the workers to raise any issue. The workers has been communicated about the platform through	Complied

		morning muster and display on notice boards. The procedure is also accessible on the SDPB’s website.	
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Interview with the workers confirmed that no forced and trafficked labour in the certification unit. The terms and conditions offered by the company were similar with that shown in their home country before. There was no contract substitution occurred. The foreign workers keep their passports themselves. Workers have the freedom to terminate employment contract anytime without any penalty.</p>	Complied
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby’s Human Rights Charter revised 2020 and can be accessed via www.simedarbyplantation.com where they committed as follows:</p> <ul style="list-style-type: none"> - Providing equal opportunity - Respecting freedom of association - Eradicating any form of exploitation - Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs - Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, 	Complied

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		<p>eliminating risk caused by debt bondage and avoiding contract substitution.</p> <p>Foreign workers will be provided with induction training prior to work. Moreover, they were provided with decent living condition and free from any form of discrimination. The workers informed through interview that they were treated equally without any discrimination and allowed to join the NUPW freely.</p>							
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.									
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Refer Safety and health Committee Procedures dated 17/11/2021 with reference number UM/HSE/OCP/08. The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The mill and estates manager has been appointed as person responsible for safety and health cum chairman for safety and health. All correspondence were sighted and verified. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training. Concerns on issue related health, safety and welfare were discussed at these meetings and recorded.</p> <p>The OSH Committee meeting for Estate was conducted on quarterly basis. Reviewed the latest minutes meeting FY 2022 as follows:</p> <table border="1" data-bbox="1137 1228 1928 1348"> <tr> <td>OSH Meeting 2022</td> <td>Elphil Estate</td> <td>Elphil POM</td> </tr> <tr> <td>1st Quarter</td> <td>09/03/2022</td> <td>21/03/2022</td> </tr> </table>	OSH Meeting 2022	Elphil Estate	Elphil POM	1 st Quarter	09/03/2022	21/03/2022	Complied
OSH Meeting 2022	Elphil Estate	Elphil POM							
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6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>The procedures for accident and emergencies have been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarized in a chart flow form and displayed for information of all employees in the estates and mill. They includes emergencies relating fire, chemical spillage, flood and accident at work place. Refer Emergency Preparedness & Response Procedures date 17/11/2021 with reference number UM/HSE/SP/02 and Standard Operating Procedure of Incidents, Accidents & Non Compliance Management dated 01/05/2022 with reference number SDP/GS-HSE/SP/01.</p> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important</p>	Complied																								

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		<p>telephone contact numbers were also provided therein. Procedure's guidelines were issued by SPO and amended to tailor to the situation differences in the estates and mill.</p> <p>The operating units continuously provide training to the workers to ensure the awareness on the ERP. Reviewed the training records as follows:</p> <table border="1" data-bbox="1137 587 1921 877"> <thead> <tr> <th>Estate/ Mill</th> <th>ERP Training date</th> </tr> </thead> <tbody> <tr> <td>Elphil Estate</td> <td>23/02/2023</td> </tr> <tr> <td>Elphil POM</td> <td>12/09/2022</td> </tr> <tr> <td>Kinta Kellas Estate</td> <td>16/12/2022</td> </tr> <tr> <td>Kamuning Estate</td> <td>24/02/2023</td> </tr> </tbody> </table> <p>Procedure for First Aid has been established. Refer SOP First Aid In Workplace Procedure dated 09/03/2021 with reference number UM/HSE/OCP/01. The operating provided first aid kit/box and located in designated places or assigned to competent first aider. The operating units has also established an information on the location of first aid box, name and contact no. of the assigned first aider and communicated through briefing, training and displayed on notice board. First aid kit was monitored on monthly basis for estate and quarterly basis for mill. Latest inspection as follows:</p> <table border="1" data-bbox="1137 1193 1921 1398"> <thead> <tr> <th>Estate/ Mill</th> <th>First Aid Training date</th> <th>Latest First Aid Monitoring Record</th> </tr> </thead> <tbody> <tr> <td>Elphil Estate</td> <td>24/02/2023</td> <td>01/02/2023</td> </tr> <tr> <td>Elphil POM</td> <td>19/12/2022</td> <td>01/02/2023</td> </tr> </tbody> </table>	Estate/ Mill	ERP Training date	Elphil Estate	23/02/2023	Elphil POM	12/09/2022	Kinta Kellas Estate	16/12/2022	Kamuning Estate	24/02/2023	Estate/ Mill	First Aid Training date	Latest First Aid Monitoring Record	Elphil Estate	24/02/2023	01/02/2023	Elphil POM	19/12/2022	01/02/2023	
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		Kinta Kellas Estate	10/03/2022	01/02/2023	
		Kamuning Estate	15/02/2023	01/02/2023	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine</p>	<p><u>Elphil POM</u> Accident records were maintained and updated monthly at the mill. The JKPP 8 form have been submitted for the year ending 2022 on 10/01/2023 with reference number JKPP8/123971/2022. There were 6 accidents recorded with 28 days TLA.</p> <p><u>Elphil Estate</u> Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2022 on 19/01/2023 with reference number JKPP8/134280/2022. There were 4 accidents recorded with 259 days TLA.</p> <p><u>Kinta Kellas Estate</u> Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2022 on 04/01/2023 with reference number JKPP8/118835/2022. There were 3 accidents recorded with 29 days TLA.</p> <p><u>Kamuning Estate</u> Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2022 on 04/01/2023 with reference number JKPP8/136886/2022. There were 7 accidents recorded with 72 days TLA.</p>	<p>Refer PPE Issuance record for the year 2023. The estates and mill provide PPE to the employees such as apron, safety helmets, and safety shoes relevant to the work handled by the workers. Records</p>	<p>Complied</p>	

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	<p>operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>of PPE issuance for the estate were sighted. During the site visit workers was observed to be in PPE. Based on the HIRARC carried out at the estates/mill the PPE types for the various activities has been identified and implemented.</p> <table border="1" data-bbox="1137 539 1928 916"> <thead> <tr> <th>Category</th> <th>PPE provided</th> </tr> </thead> <tbody> <tr> <td>Tractor Driver</td> <td>Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.</td> </tr> <tr> <td>Sprayers</td> <td>Respirator, nitrile glove, goggles, wellington boots, apron.</td> </tr> <tr> <td>Manuring</td> <td>Apron, wellington boots, dust mask, nitrile glove.</td> </tr> <tr> <td>Harvester</td> <td>Safety helmet, Goggle, sickle cover, hand glove, wellington boots</td> </tr> </tbody> </table> <p>Similarly, the mill issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded.</p> <table border="1" data-bbox="1137 1134 1928 1347"> <thead> <tr> <th>Category</th> <th>PPE provided</th> </tr> </thead> <tbody> <tr> <td>Mill operator</td> <td>Safety boots, earmuff, safety vest, helmet, cotton glove</td> </tr> <tr> <td>Workshop</td> <td>Safety Helmets, Goggles, Leather Gloves, safety Shoes.</td> </tr> </tbody> </table>	Category	PPE provided	Tractor Driver	Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.	Sprayers	Respirator, nitrile glove, goggles, wellington boots, apron.	Manuring	Apron, wellington boots, dust mask, nitrile glove.	Harvester	Safety helmet, Goggle, sickle cover, hand glove, wellington boots	Category	PPE provided	Mill operator	Safety boots, earmuff, safety vest, helmet, cotton glove	Workshop	Safety Helmets, Goggles, Leather Gloves, safety Shoes.	
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<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees by the organization and covered by accident insurance. Reviewed on workers profile records found that all workers are covered by the accident insurances. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for November and December 2022 for the mill and all sampled estate as below.</p> <table border="1" data-bbox="1137 571 1930 1161"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Elphil Estate</td> <td>Nov 2022</td> <td>134</td> <td>RM 5,754.00</td> </tr> <tr> <td>Jan 2023</td> <td>145</td> <td>RM 6,207.10</td> </tr> <tr> <td rowspan="2">Elphil POM</td> <td>Nov 2022</td> <td>122</td> <td>RM 8,201.60</td> </tr> <tr> <td>Jan 2023</td> <td>122</td> <td>RM 7,614.30</td> </tr> <tr> <td rowspan="2">Kinta Kellas Estate</td> <td>Dec 2022</td> <td>86</td> <td>RM 4,004.90</td> </tr> <tr> <td>Jan 2023</td> <td>86</td> <td>RM 5,255.80</td> </tr> <tr> <td rowspan="2">Kamuning Estate</td> <td>Dec 2022</td> <td>340</td> <td>RM 16,070.40</td> </tr> <tr> <td>Jan 2023</td> <td>343</td> <td>RM 12,715.40</td> </tr> </tbody> </table>	Operating Unit	Month	Total Workers	Amount	Elphil Estate	Nov 2022	134	RM 5,754.00	Jan 2023	145	RM 6,207.10	Elphil POM	Nov 2022	122	RM 8,201.60	Jan 2023	122	RM 7,614.30	Kinta Kellas Estate	Dec 2022	86	RM 4,004.90	Jan 2023	86	RM 5,255.80	Kamuning Estate	Dec 2022	340	RM 16,070.40	Jan 2023	343	RM 12,715.40	<p>Complied</p>
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<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKKP 8 form were submitted to DOE through MyKKP systems. Occupational Injuries were recorded as below:</p> <table border="1" data-bbox="1137 1347 1930 1394"> <tr> <td></td> <td>2022</td> <td></td> <td></td> </tr> </table>		2022			<p>Complied</p>																												
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		Operating Unit	Cases	TLA	Hours worked	Average Worker	
		Elphil Estate	4	259	367,920	126	
		Elphil POM	6	28	344,072	117	
		Kinta Kellas Estate	3	29	201,528	81	
		Kamuning Estate	7	72	667,608	278	

Principle 7: Protect, conserve and enhance ecosystems and the environment

Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>Integrated Pest Management Plan has been established for the year of 2023. The plan was monitored by person in charge with target date and completion status. Among the plan as below:</p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 50%;">Issue / Area</th> <th style="width: 50%;">Action Plan</th> </tr> </thead> <tbody> <tr> <td>Bagworm attack</td> <td>To increase plan beneficial plan ratio per Ha 1dm:1Ha to 2dm:1ha</td> </tr> <tr> <td>Rat attack</td> <td>To increase ratio BOB from 1:30 and gradually to 1:10 ratio</td> </tr> <tr> <td>Soil Moisture</td> <td>To Plan Nephrolepis to emergence of weed and also to increase moisture</td> </tr> <tr> <td>Chipping of trunk</td> <td>To chipping trunk below 10cm in order to avoid breeding of rhino beetle</td> </tr> <tr> <td>LCC</td> <td>To prevent breeding of RB</td> </tr> </tbody> </table>	Issue / Area	Action Plan	Bagworm attack	To increase plan beneficial plan ratio per Ha 1dm:1Ha to 2dm:1ha	Rat attack	To increase ratio BOB from 1:30 and gradually to 1:10 ratio	Soil Moisture	To Plan Nephrolepis to emergence of weed and also to increase moisture	Chipping of trunk	To chipping trunk below 10cm in order to avoid breeding of rhino beetle	LCC	To prevent breeding of RB	Complied
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		<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Single layer of EFB Mulching</td> <td style="width: 50%;">To prevent breeding of RB</td> </tr> </table> <p>Monitoring has been conducted by estates. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. Barn owls Tyto Alba has been used for biological control of rats. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. The estates have planted beneficial plants such as Cassia cobanensis and Turnera subulata and Antigonon leptopus.</p>	Single layer of EFB Mulching	To prevent breeding of RB	
Single layer of EFB Mulching	To prevent breeding of RB				
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Species referenced in the Global Invasive Species Database and CABI.org are not used in the estate.</p>	Complied		
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no evidence of use of fire for pest control in all the estate.</p>	Complied		
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.					
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>All pesticides used were those officially registered under the Pesticide Act 1974. The certification units confined usage to only class II, class III & class IV pesticides.</p> <p>a) No illegal agrochemicals (stated by local and international laws) paraquat was used in the CU estates.</p> <p>b) The usage of the agrochemicals was based on the Standard Operating Procedure under Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime</p>	Complied		

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		Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01.07.2011. Selected products are specific to the target pest, weed and disease.	
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides used and a.i per Ha is monitored monthly in the yearly Pesticide Records for 2022. Records of pesticides used (including active ingredients used and their Lethal Dosage (LD 50), area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate. Sighted Monitoring Record Pesticide Use Per Ha FY2022.</p> <p>Average data as per estates below:</p> <p>Elphil Estate: 1.88</p> <p>Kinta Kellas Estate: 1.23</p> <p>Kamuning Estate: 0.70</p>	Complied
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>During the audit, it was observed and recorded that the Estates had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions.</p> <p>a) Paraquat usage has been prohibited in all units and the entirety of the organization.</p> <p>b) The Safety Procedures for pesticides application were well described in Pictorial Safety Standard/SOP</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	No evidence of prophylactic use of pesticides in the estates visited as per Register of Chemicals Hazardous to Health for all estates visited.	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	The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations. The register showed and concluded that all pesticides used were of class II, III	Complied

	<p>by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>& class IV. The use of paraquat had been prohibited in all IOI estates. As for usage of highly toxic/limited pesticides, the estates acquired permit from Department of Agriculture. SDS were placed in the chemical store for emergency purpose. Emergency eye wash located at the chemical store were functioned. Estate’s usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <p>There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. Sighted from records and interviews with workers, staff and estate assistants, concluded that training was held with all precautions being taken and all legal requirements met. Sample of chemical used in the estates among others as listed below;</p> <table border="1" data-bbox="1137 863 1930 1209"> <thead> <tr> <th>No</th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate Isopropylamine 41%</td> <td>III</td> </tr> <tr> <td>2</td> <td>Metsulfuron Methyl 20%</td> <td>IV</td> </tr> <tr> <td>3</td> <td>Triclopyr Butoxy Ethyl Ester 32.1%</td> <td>III</td> </tr> <tr> <td>4</td> <td>Cyperact 16.0 EC</td> <td>III</td> </tr> <tr> <td>5</td> <td>Monex HC</td> <td>III</td> </tr> <tr> <td>6</td> <td>Winter 32.1 EC</td> <td>III</td> </tr> </tbody> </table>	No	Chemical name	Class	1	Glyphosate Isopropylamine 41%	III	2	Metsulfuron Methyl 20%	IV	3	Triclopyr Butoxy Ethyl Ester 32.1%	III	4	Cyperact 16.0 EC	III	5	Monex HC	III	6	Winter 32.1 EC	III	
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6	Winter 32.1 EC	III																						
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6).</p>	<p>The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant. Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal</p>	Complied																					

	<p>Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>protective equipment's and application equipment provided to the operators based on the PPE issuance forms. Reviewed the training records as per criteria 3.7.2. Sampled the training conducted for pesticide handlers as below: -</p> <p><u>Elphil Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>SDS Briefing</td> <td>21/01/2023</td> </tr> <tr> <td>Chemical handling</td> <td>16/02/2023</td> </tr> </tbody> </table> <p><u>Elphil POM</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical handling</td> <td>12/02/2023</td> </tr> </tbody> </table> <p><u>Kinta Kellas Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Spraying Technique Training</td> <td>28/09/2022</td> </tr> </tbody> </table> <p><u>Kamuning Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical Handling</td> <td>22/02/2023</td> </tr> <tr> <td>PPE and Spraying Training</td> <td>22/02/2023</td> </tr> <tr> <td>PPE & Inter pump Training</td> <td>04/10/2022</td> </tr> </tbody> </table>	Training	Date	SDS Briefing	21/01/2023	Chemical handling	16/02/2023	Training	Date	Chemical handling	12/02/2023	Training	Date	Spraying Technique Training	28/09/2022	Training	Date	Chemical Handling	22/02/2023	PPE and Spraying Training	22/02/2023	PPE & Inter pump Training	04/10/2022	
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		<p>Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product.</p> <ul style="list-style-type: none"> a) The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be handled in a safe method. b) The trade and generic names of the chemicals were made known to the workers through the SDS training. SDS was also displayed at all storage areas as observed during the audit. c) The training included the safety aspects and usage of PPE when handling with pesticides. Records of training are shown in 3.7.2 and verified. d) All workers involved in pesticide application were provided with appropriate PPE and replaced when worn-out. PPE issuance & replacement records were verified by the auditors. <p>From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe chemical handling procedure.</p>	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the storekeeper was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.</p>	Complied

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7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>The procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Collection of SW409 (empty chemical container) is made by licensed vendor registered with DOE. I.e Pentas Flora (Ipoh) Sdn Bhd</p> <p>b) The clinical waste SW 404 is disposed to Edgenta Mediserve Sdn Bhd</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Aerial application of agrochemicals is not practiced in estates visited. This is confirmed through observation during the site visit and interview with the employees.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The CHRA for the estates and the mill was conducted. In addition, the assessor recommended medical surveillance be conducted for the categories of employees who have contact with chemicals. The medical surveillance was carried out on as below:</p> <p>Elphil POM - Medical Surveillance has been conducted on 31/01/2023 for 1 worker and 21/12/2022 for 23 workers by Klinik Tweedie. A total of 23 workers were examined and none of them got abnormal results or recommended for removal. All workers tested was fit to work.</p> <p>Elphil Estate - Medical Surveillance has been conducted on 31/01/2023 for 1 worker and 06/06/2022 for 7 workers by Klinik Tweedie. A total of 7 workers were examined and none of them got abnormal results or recommended for removal. All workers tested was fit to work.</p>	Complied

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		<p>Kinta Kellas Estate - Medical Surveillance has been conducted on 16/05/2022 for 1 worker and 06/06/2022 for 6 workers by Klinik Edina. A total of 6 workers were examined and none of them got abnormal results or recommended for removal. All workers tested was fit to work.</p> <p>Kamuning Estate - Medical Surveillance has been conducted on 16/02/2023 for 15 workers by Klinik Tweedie. A total of 15 workers were examined and none of them got abnormal results or recommended for removal. All workers tested was fit to work.</p>					
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Mill and estates complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Group Sustainability and Quality Policy Statement dated Dec 2019, supported by SDP Human Rights Charter and Occupational Safety and Health Policy superseded by SDP Group Health, Safety & Environment (HSE) Policy dated May 2022. The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Verified through record checking and site observation, there is no women work as sprayers and manurer.</p>	Complied				
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>							
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>SOU3 Elphil POM and Estates had identified all wastes and sources of pollution. The Waste Management Action Plan FY 2022/2023 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estate and mill operations were:</p> <table border="1" data-bbox="1137 1321 1908 1366"> <thead> <tr> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Receptor	Sources			Non-compliance
Receptor	Sources						

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1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG																					
	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down																					
	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.																					
<p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2022/2023. The waste generated from the mill/estate operations as shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fibre, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>The pollution identified from the mill activities</p> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke and particulate</td> <td>Emission from Boilers</td> </tr> </tbody> </table>				Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill complex and employees' quarters	3	Industrial waste	Fibre, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex		Type of waste	Details	1	Black smoke and particulate	Emission from Boilers
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		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20px; text-align: center;">2</td> <td style="width: 30%;">Odour & gases</td> <td style="width: 10%;"></td> <td style="width: 40%;">Activities from the effluent treatment</td> </tr> <tr> <td style="text-align: center;">3</td> <td>Leakage of lubricant</td> <td style="text-align: center;">of</td> <td>Storage & vehicle maintenance</td> </tr> </table> <p>Waste management plan to include recycling and disposal of waste generated from external parties were not comprehensively documented and implemented at the following estates:</p> <p><u>Kinta Kellas Estate</u></p> <p>Sighted empty paint containers, used oil lubricant (red color), used oil/grease (yellow color) was dumped near to post guard. Based on information given by management team, the waste was temporary stored by contractor after completing work in the estate.</p> <p><u>Kamuning Estate</u></p> <p>Onsite interview was carried out with YIH Construction Sdn Bhd has confirmed that machinery maintenance and service was done on the ground. Responsibilities of the said contractor to manage all waste (SW, recycle, domestic waste etc) generated accordingly was spelled out under contract form, term of delivery no. (iii). However, this was not clearly defined under waste management plan for FY2023.</p> <p>Thus, a minor NC was issued.</p>	2	Odour & gases		Activities from the effluent treatment	3	Leakage of lubricant	of	Storage & vehicle maintenance	
2	Odour & gases		Activities from the effluent treatment								
3	Leakage of lubricant	of	Storage & vehicle maintenance								
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>The SOP on Scheduled Waste disposal is established and implemented.</p> <p>a) Details as provided in SDP MQMS Standard Operating Procedure Section VII- Handling of scheduled waste (Hazardous Waste) Management ref no. SD/SDP/PSQM (ESH) /203-EN1 dated 26/2/2015.</p> <p>b) The inventory of the waste generated is recorded using the "E-</p>	Complied								

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- SWISS" inventory system. Methodology of SW disposal is also described in indicator 4.5.3.2 above.
- c) All SW are disposed to Pentas Flora Sdn Bhd no 004640 licence valid dated 30/4/2023. Details as sampled as shown below;
 - d) The mill has written on 27/10/22 and received approval from DOE Perak on the storage extension for SW 109 in view of the low quantity to licensed collector Kualiti Alam Sdn Bhd. Letter was sighted and verified.

Elphil POM

Disposal arrangement for scheduled waste

	SW collector	Date	SW 409	SW 306	SW 322	SW 418	SW 410	SW 305
1	Pentas Flora	21/02/23	0.281	1.095	0.018	0.004	0.055	-
		25/08/22	0.023	-	0.066	0.016	0.073	0.207
		21/11/22	-	-	0.048	-	-	-
2	Kualiti Alam SW109 - 21/11/22				0.048	-	-	-

	Disposal vendor	Licence no	Validity
1	Pentas Flora Sdn Bhd	005470	30/04/2023
2	Kualiti Alam Sdn Bhd	003291	30/04/2023

The inventory of the waste generated is recorded using the "E-SWISS" inventory system. Methodology of SW disposal is also

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described in indicator 4.5.3.2 above. All SW are disposed to Edgenta Mediserve Sdn Bhd for the SW 404 and Pentas Flora (Ipoh) Sdn Bhd and Kubota Malaysia Sdn Bhd for the workshop lubricant and others waste. The estates scheduled wastes are disposed to Kubota Malaysia collection upon completion of machine/vehicles servicing and maintenance.

	Estates	Date	SW 410	SW 305	SW 404	SW 409	SW 306
	Elphil	21/09/22	0.025	0.246	-	-	-
1	Elphil	13/09/22	0.002	0.060	-	0.250	0.040
2	Elphil	06/05/22	0.025	0.246	-	-	-
3	Elphil	07/03/22	-	0.250	-	0.970	0.150
4	Elphil	28/09/22	-	-	0.001	-	-
5	Elphil	29/03/22	-	-	0.001	-	-
1	Kamuning	23/02/23	-	0.010	-	1.198	-
2	Kamuning	19/01/23	-	0.009	-	0.654	-
3	Kamuning	26/11/22	-	0.100	-	1.060	0.070
4	Kamuning	07/02/23	-	-	0.004	-	-
	Kamuning	08/11/22	-	-	0.003	-	-

Letter form DOE Putrajaya dated 13/04/2022 on the approval for Kubota Malaysia Sdn Bhd for collection and disposal management of scheduled waste from machine/vehicle servicing and

		maintenance was sighted and verified. Collection made for SW 305 and SW 410.	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	<p>There was no land preparation in SOU 3 Elphil POM and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Group Sustainability and Quality Policy Statement dated Dec 2019, supported by SDP Responsible Agriculture Charter <p>SDP has a policy of no open burning. As advocated, the estate practiced zero burning. In the replants visited during the audit in the Estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	<p>SOP on managing soil fertility for optimize yield and minimize environmental impacts has been established. The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents.</p> <ul style="list-style-type: none"> • EQMS chapter B8 - Leguminous Cover Crops • EQMS chapter B14 – Manuring • ARM Section 8 – Manuring 	Complied
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 -	Foliar and soil sampling was carried out by Research and Development Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conduct for every year while	Complied

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		<p>for soil analysis, the frequency for soil sampling is conducted at 5 years intervals.</p> <p>Reviewed the sampling records as follows:</p> <p><u>Elphil Estate</u></p> <p>Latest Soil Sampling was conducted from 08/03/2019. Refer report no. S40/2019 dated 17/04/2019. Latest leaf sampling was conducted in 27/10/2022. Refer report no. P562/2022 dated 22/11/2022.</p> <p><u>Kinta Kellas Estate</u></p> <p>Latest Soil Sampling was conducted from 04/12/2018. Refer report no. S7/2019 dated 02/01/2019. Latest leaf sampling was conducted in 08/11/2022. Refer report no. P591/2022 dated 14/12/2022.</p> <p><u>Kamuning Estate</u></p> <p>Latest Soil Sampling was conducted from 04/12/2018. Refer report no. S7/2019 dated 02/01/2019. Latest leaf sampling was conducted in 08/11/2022. Refer report no. P591/2022 dated 14/12/2022.</p>	
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The mill disposed EFB by send to neighbouring sister estate as nutrient recycle program. Reviewed the EFB disposal records FY 2022 as follows:</p> <p>The following practices are applied in the estates in relation to the nutrient recycling strategy.</p> <ol style="list-style-type: none"> 1. EFB application in designated fields at dosage of 40 mt/ha applied in inter rows subject to Agronomist recommendations. 2. Cut frond are stacked in between the palm’s rows left to discompose. 	Complied

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		<p>The estate has established EFB and Bio-Compost application program FY 2022. Reviewed the application records as to date December 2022 as follows:</p> <table border="1" data-bbox="1137 475 1928 770"> <thead> <tr> <th data-bbox="1137 475 1435 564">Estate</th> <th data-bbox="1435 475 1928 564">EFB Transported for Field Application (MT)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 564 1435 654">Elphil Estate</td> <td data-bbox="1435 564 1928 654">P1998G, P1999G, P2010B, P2011A, P2012A, P1999P</td> </tr> <tr> <td data-bbox="1137 654 1435 715">Kinta Kellas Estate</td> <td data-bbox="1435 654 1928 715">P2016A, P2016B, P2014B</td> </tr> <tr> <td data-bbox="1137 715 1435 770">Kamuning Estate</td> <td data-bbox="1435 715 1928 770">P2010A, P2012C,B, P20221H, I, A, C</td> </tr> </tbody> </table> <p>Elphil POM was discharge POME through land application, Furrow System. Analysis has been submitted. Refer Effluent Treatment Plant Sample (Final Discharge) dated 08/02/2023. Analysis report showed all results comply with the parameter.</p>	Estate	EFB Transported for Field Application (MT)	Elphil Estate	P1998G, P1999G, P2010B, P2011A, P2012A, P1999P	Kinta Kellas Estate	P2016A, P2016B, P2014B	Kamuning Estate	P2010A, P2012C,B, P20221H, I, A, C	
Estate	EFB Transported for Field Application (MT)										
Elphil Estate	P1998G, P1999G, P2010B, P2011A, P2012A, P1999P										
Kinta Kellas Estate	P2016A, P2016B, P2014B										
Kamuning Estate	P2010A, P2012C,B, P20221H, I, A, C										
7.4.4	<p>Records of fertiliser inputs are maintained. - Minor compliance -</p>	<p>The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. The fertiliser application records were available at the estate visited for review. The estate reported the fertilised application to the Research and Development Carey Island. Refer 2022 Fertiliser Programme and Application Record.</p>	Complied								
<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>											
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Soil maps were available at all estates identifying the type of soil series and its area percentage in the estate. There were no marginal and fragile soils identified at the assessed estates. During field visit at the estates, it was sighted there was no oil palm planting on steep terrains as well</p>	Complied								

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7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	Policy on slope protection and documented in Group Sustainability and Quality Policy Statement dated Dec 2019, supported by SDP Responsible Agriculture Charter. The policy stated for slope more than 25 degree must be exclude from any new plantation development and replanting program. All the existing crop and vegetation shall be maintained accordingly.	Complied																															
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting conducted at all estates visited as verified and sighted during site visit.	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 -	Sighted Soil series and topography map at sampled estates. No fragile soil categorized in the estates sampled. The estate has taken into account the land terrain, drainage and road systems in planning for replanting. Refer table below on details of soil series for estates: <table border="1" data-bbox="1137 900 1935 1380"> <thead> <tr> <th rowspan="2">Soil series</th> <th colspan="3">Percentage, %</th> </tr> <tr> <th>Elphil Estate</th> <th>Kinta Kellas Estate</th> <th>Kamuning Estate</th> </tr> </thead> <tbody> <tr> <td>Bungor</td> <td>2.08</td> <td>59.28</td> <td>11.38</td> </tr> <tr> <td>Durian</td> <td>0.96</td> <td>0.09</td> <td>-</td> </tr> <tr> <td>Holyrood</td> <td>4.50</td> <td>-</td> <td>-</td> </tr> <tr> <td>Klau</td> <td>21.82</td> <td>-</td> <td>-</td> </tr> <tr> <td>Langkawi</td> <td>0.92</td> <td>-</td> <td>15.24</td> </tr> <tr> <td>Malacca</td> <td>17.11</td> <td>12.67</td> <td>-</td> </tr> </tbody> </table>	Soil series	Percentage, %			Elphil Estate	Kinta Kellas Estate	Kamuning Estate	Bungor	2.08	59.28	11.38	Durian	0.96	0.09	-	Holyrood	4.50	-	-	Klau	21.82	-	-	Langkawi	0.92	-	15.24	Malacca	17.11	12.67	-	Complied
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Unclassified	33.57	-	-																																
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Soil series and topography map available for estate sampled. No fragile soil categorized in the estates sampled. The estate has taken into account the land terrain, drainage and road systems in planning for replanting.</p>	Complied																																
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>The Agronomy Advisory and Services Department conducted assessment and provided the estates with topography maps. Sampled topography information at estates sited as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Degree</th> <th colspan="3">Percentage, %</th> </tr> <tr> <th>Elphil Estate</th> <th>Kinta Kellas Estate</th> <th>Kamuning Estate</th> </tr> </thead> <tbody> <tr> <td>0°-2° - Flat</td> <td>52.01</td> <td>23.48</td> <td>16.59</td> </tr> <tr> <td>2°-6° - Undulating</td> <td>39.28</td> <td>44.88</td> <td>41.01</td> </tr> </tbody> </table>	Degree	Percentage, %			Elphil Estate	Kinta Kellas Estate	Kamuning Estate	0°-2° - Flat	52.01	23.48	16.59	2°-6° - Undulating	39.28	44.88	41.01	Complied																	
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		6°-12° - Terraces	7.22	30.38	36.92	
		12°-20° - Hilly	1.42	1.30	5.32	
		20°-25° - Hilly	0.02	0.00	0.16	
		>25° - Steep	0.00	0.00	0.00	
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.						
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	There is no new planting at sample estates. There is no peat soil identified at all estates visited in SOU 3. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criteria was not applicable.				Not Applicable
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	There is no new planting at sample estates. There is no peat soil identified at all estates visited in SOU 3. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criteria was not applicable.				Not Applicable
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	There is no new planting at sample estates. There is no peat soil identified at all estates visited in SOU 3. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criteria was not applicable.				Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	There is no new planting at sample estates. There is no peat soil identified at all estates visited in SOU 3. Verification through site visit, document checking, and interview confirmed that there is no				Not Applicable

		new planting activity in the estate visited. Hence, the criteria was not applicable.	
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	There is no new planting at sample estates. There is no peat soil identified at all estates visited in SOU 3. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criteria was not applicable.	Not Applicable
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Sime Darby has established SOP on Agricultural Reference Manual dated 01/07/2008 Section 10.4.1 titled Water Management in Coastal or Peat Planting. There is no new planting at sample estates. There is no peat soil identified at all estates visited in SOU 3. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criteria was not applicable.	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation</p>	There is no new planting at sample estates. There is no peat soil identified at all estates visited in SOU 3. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criteria was not applicable.	Not Applicable

	<p>Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -</p>																														
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>																															
<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <ul style="list-style-type: none"> a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. <p>- Minor compliance -</p>	<p>Both the Mill and Estate had established its Water Management Plan for year 2022 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <ul style="list-style-type: none"> a) Implementation of rain water harvest, b) Construction of water gate for effective management of field drains, c) Establishment of <i>Mucuna bracteata</i> to prevent erosion, d) Side drain at field road to control water, frond stacking, e) Enhancement of ground vegetation at bare ground area. <p>The water sources are as shown below;</p> <table border="1" data-bbox="1137 911 1928 1399"> <thead> <tr> <th></th> <th>Water sources</th> <th>Usage</th> <th>Monitoring & measurement</th> <th>Freq</th> <th>PI C</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>LAP</td> <td>Purchased for domestic consumption</td> <td>Monitoring water supply</td> <td>Mthly</td> <td>AMM gr</td> <td>Liaison with Authority</td> </tr> <tr> <td>2</td> <td>Rain water</td> <td>Domestic use Workshop Chemical mixing</td> <td>Rain fall data</td> <td>On-going</td> <td>AMM gr</td> <td>Water harvesting for general washing</td> </tr> <tr> <td>3</td> <td>Water tank</td> <td>Emergency water supply</td> <td>-</td> <td>-</td> <td>AM</td> <td>Request water supply from</td> </tr> </tbody> </table>		Water sources	Usage	Monitoring & measurement	Freq	PI C	Review status	1	LAP	Purchased for domestic consumption	Monitoring water supply	Mthly	AMM gr	Liaison with Authority	2	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	On-going	AMM gr	Water harvesting for general washing	3	Water tank	Emergency water supply	-	-	AM	Request water supply from	<p>Complied</p>
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		<p>The Estate had implemented water managements plans which covered:</p> <ul style="list-style-type: none"> a) Water shortage contingencies b) Water pollution prevention c) Reduce wastage d) Identification & management of waste waters e) Monitoring rainfall f) Regular water quality analysis. <p>The water reduction plan is shown below;</p> <table border="1" data-bbox="1137 703 1910 1369"> <thead> <tr> <th></th> <th>Issues/Areas</th> <th>Action Steps</th> <th>PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Rainwater collection</td> <td>Large containers are to be placed at strategic locations to collect rainwater The rainwater shall be recycled for washing heavy machinery</td> <td>AM/Field staff</td> <td>On-going</td> </tr> <tr> <td>2</td> <td>Leakage on plumbing system</td> <td>Frequent inspection to detect leakage Fix any leakage</td> <td>AM/Field staff</td> <td>On-going</td> </tr> <tr> <td>3</td> <td>Water compartmentalization</td> <td>To conserve level of soil moisture To minimize water stress during dry season</td> <td>AM/Field staff</td> <td>On-going</td> </tr> <tr> <td>4</td> <td>Handling of chemicals</td> <td>To recycle water spillage while mixing of chemical at mixing area</td> <td>AM/Field staff</td> <td>On-going</td> </tr> <tr> <td>5</td> <td>education</td> <td>Avoid excessive usage during cleaning Close pipe to prevent water dripping</td> <td>AM/Field staff</td> <td>On-going</td> </tr> <tr> <td>5</td> <td>Re-streaming</td> <td>Re stream from sterilizer condensate pit for dilution</td> <td>Mill engineer</td> <td>On-going</td> </tr> </tbody> </table>		Issues/Areas	Action Steps	PIC	Status	1	Rainwater collection	Large containers are to be placed at strategic locations to collect rainwater The rainwater shall be recycled for washing heavy machinery	AM/Field staff	On-going	2	Leakage on plumbing system	Frequent inspection to detect leakage Fix any leakage	AM/Field staff	On-going	3	Water compartmentalization	To conserve level of soil moisture To minimize water stress during dry season	AM/Field staff	On-going	4	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going	5	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going	5	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going	
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		The Mill Identification & Management of Waste Water				
		location	Wastewater produced	Treatment/containment	Reuse/recycle/disposal method	
		1 Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system	
		2 Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain	
		Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	
		3 Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain	
		4 Lab	Cleaning water	Process drain	Monsoon drain	
		5 Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.	
7.8.2	(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.	SOU3 estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime				Complied

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	<p>- Critical (Major) compliance -</p>	<p>Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table border="1" data-bbox="1220 438 1825 622"> <thead> <tr> <th></th> <th><i>River width</i></th> <th><i>Buffer zone</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSD Unit with latest revision dated on 13/6/2011</p> <p>Water analysis report for surface water/river carried out every quarter as per SOP, Water Quality Monitoring, issue:1 dated 1//6/2016. Result of analysis summarized as per below:</p> <table border="1" data-bbox="1137 869 1921 965"> <thead> <tr> <th>Estate</th> <th>Date of monitoring</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Kamuning Estate</td> <td>3/2/2023</td> <td>IE221/2023</td> </tr> </tbody> </table> <p>A few parameters recorded were not complied with class IIA/IIB of NWQS and also pesticides residue in water analysis. Internal CAR was issued, and proper investigation of root cause and corrective action have been implemented.</p> <p>There were no issues on the water quality. Variation if any is investigated as per the SOP. Sampling analysis made on quarterly basis. Elphil Estate domestic water Plang Division sampling made on monthly basis for the following parameters. All results within the specifications.</p>		<i>River width</i>	<i>Buffer zone</i>	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	Estate	Date of monitoring	Remarks	Kamuning Estate	3/2/2023	IE221/2023	
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	Elphil - Plang Division - 04/01/2023											
	parameter	Std	Pt 1	Pt 2	Pt 3							
	1	pH	6-9	6.6	6.7	6.7						
	2	TDS	1000	192	204	234						
	3	Turbidity	5	1.7	1.6	1.5						
	4	Chloride	250	3.16	13.00	14.70						
	5	Aluminium	0.2	<0.001	<0.001	<0.001						
		Coliform	<10	-	-	1						
		E - Coli	Absent	-	-	ND						
	<p>Samples are taken by the mill management for detection of any pollution arising from the mill and estate activities. As required under compliance schedule, clause 17 water samples from the upstream and downstream nearby river (Sg Kerдах) are taken for analysis for detection of any contamination /quality effect to the water courses in monthly basis. Latest analysis report for upstream and downstream of Sg Kerдах as per the following:</p> <table border="1"> <thead> <tr> <th>Sampling point</th> <th>Date of monitoring</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Sg Kerдах Hulu</td> <td rowspan="2">12/1/2023</td> <td rowspan="2">Ref: E123/2023. 7 parameters tested (pH, BOD, COD, SS, AN, Do and P). No off-specification recorded.</td> </tr> <tr> <td>Sg Kerдах Hilir</td> </tr> </tbody> </table> <p>Among others management plan taken; a) Regular inspection at buffer/HCV areas</p>						Sampling point	Date of monitoring	Remarks	Sg Kerдах Hulu	12/1/2023	Ref: E123/2023. 7 parameters tested (pH, BOD, COD, SS, AN, Do and P). No off-specification recorded.
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		<ul style="list-style-type: none"> b) Monitor water from surrounding areas c) Track, measure and report all activities around river d) Train and educate workers. 																																																	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Based on “<i>Jadual Pematuhan</i>” (license no 004583 valid till 30/06/2023) Elphil POM disposed effluent on land application in Elphil Estate. Sighted quarterly report has been submitted to DOE by quarterly basis. Summary of 4th quarter of 2022 summarized as per below:</p> <table border="1"> <thead> <tr> <th></th> <th>Parameter</th> <th>STD</th> <th>05/10/22</th> <th>03/11/22</th> <th>06/12/22</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>8.37</td> <td>9.21</td> <td>8.42</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>5000</td> <td>318</td> <td>129</td> <td>142</td> </tr> <tr> <td>3</td> <td>Total Solids</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>S Solids</td> <td>-</td> <td>1933</td> <td>300</td> <td>180</td> </tr> <tr> <td>5</td> <td>Oil & Grease</td> <td>50</td> <td>4</td> <td>4</td> <td>7</td> </tr> <tr> <td>6</td> <td>AN</td> <td>150</td> <td>34</td> <td>3</td> <td>3</td> </tr> <tr> <td>7</td> <td>TN</td> <td>150</td> <td>98</td> <td>37</td> <td>40</td> </tr> </tbody> </table> <p>All parameters tested complied with regulatory standards</p>		Parameter	STD	05/10/22	03/11/22	06/12/22	1	pH	5-9	8.37	9.21	8.42	2	BOD mg/l	5000	318	129	142	3	Total Solids	-	-	-	-	4	S Solids	-	1933	300	180	5	Oil & Grease	50	4	4	7	6	AN	150	34	3	3	7	TN	150	98	37	40	Complied
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording detailed sampled (water usage m3/per mt of fresh fruit bunches (FFB) 2022 below;</p> <table border="1"> <thead> <tr> <th></th> <th>Mth</th> <th>FFB</th> <th>Water</th> <th>ratio</th> <th>Mth</th> <th>FFB</th> <th>Water</th> <th>Ratio</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>13755</td> <td>16715</td> <td>1.22</td> <td>July</td> <td>17870</td> <td>21776</td> <td>1.22</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>13167</td> <td>19126</td> <td>1.45</td> <td>Aug</td> <td>21076</td> <td>23023</td> <td>1.09</td> </tr> </tbody> </table>		Mth	FFB	Water	ratio	Mth	FFB	Water	Ratio	1	Jan	13755	16715	1.22	July	17870	21776	1.22	2	Feb	13167	19126	1.45	Aug	21076	23023	1.09	Complied																					
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-	-	-	-	-	Total	208799	248502	1.19																																								
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																																																
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>For the estates, the plan to optimise the usage of diesel is documented in the Energy Management Plan 2022. Among the action plans implemented are by doing regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. The utilization of fossil fuel in 2022 is being monitored with records shown below:</p> <table border="1"> <thead> <tr> <th>Site</th> <th>Elphil</th> <th>Kamuning</th> <th>Site</th> <th>Elphil</th> <th>Kamuning</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>1.56</td> <td>3.19</td> <td>July</td> <td>1.21</td> <td>2.28</td> </tr> <tr> <td>Feb</td> <td>1.93</td> <td>2.04</td> <td>Aug</td> <td>1.19</td> <td>2.11</td> </tr> <tr> <td>Mac</td> <td>1.97</td> <td>1.93</td> <td>Sep</td> <td>1.32</td> <td>2.22</td> </tr> <tr> <td>Apr</td> <td>2.18</td> <td>2.49</td> <td>Oct</td> <td>1.40</td> <td>2.17</td> </tr> <tr> <td>May</td> <td>1.21</td> <td>1.96</td> <td>Nov</td> <td>1.52</td> <td>2.21</td> </tr> <tr> <td>Jun</td> <td>1.60</td> <td>2.02</td> <td>Dec</td> <td>1.37</td> <td>2.65</td> </tr> </tbody> </table>	Site	Elphil	Kamuning	Site	Elphil	Kamuning	Jan	1.56	3.19	July	1.21	2.28	Feb	1.93	2.04	Aug	1.19	2.11	Mac	1.97	1.93	Sep	1.32	2.22	Apr	2.18	2.49	Oct	1.40	2.17	May	1.21	1.96	Nov	1.52	2.21	Jun	1.60	2.02	Dec	1.37	2.65	Complied			
Site	Elphil	Kamuning	Site	Elphil	Kamuning																																											
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			-	-	Baseline		1.36	1.95
			-	-	Total		38169	49890

The monitoring is recorded in environment performance indicator- electricity generated by steam turbine tabulated for the financial year 2022. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt FFB. A monthly record on energy consumption for both renewable and non-renewable sources were also maintained and documented. It is monitored to optimize use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel. Diesel consumption & ratio diesel used /mt FFB (Baseline set at 0.060).

The electricity energy monitoring based on CPO produced tabulated as shown below;

	Energy Monitoring	2019	2020	2021	2022
1	TNB (KVARH)	811480	977039	1362210	940360
2	TNB /mt CPO	18.98	24.75	28.62	22.91
3	Turbine 1&2 (kWH)	46596.8	40924.8	45920.9	45105.0
4	Kwh / mt CPO	1.090	1.036	0.965	1.099
5	FFB processed /mt	210873	191143	227627	208798
6	CPO produced / mt	42738.9	39467.4	47585.7	41032.1

Variation of ratio in the analysis were explained and justified. Under the energy management plan 2023 the mill aimed for reduction plan among others;

- i. educate workers on fuel saving practice
- ii. avoid leakages during vehicles maintenance

Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

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7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4. Detail of GHG calculation can be found under appendix B.</p>	Complied						
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable						
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estate and mill activities / operation. ‘Pollution Identification Environmental Improvement Action Plan’ is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1153 1230 1906 1391"> <thead> <tr> <th data-bbox="1153 1230 1196 1289"></th> <th data-bbox="1205 1230 1400 1289">Environmental receptors</th> <th data-bbox="1408 1230 1906 1289">Source</th> </tr> </thead> <tbody> <tr> <td data-bbox="1153 1295 1196 1391">1</td> <td data-bbox="1205 1295 1400 1391">Air</td> <td data-bbox="1408 1295 1906 1391">Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and</td> </tr> </tbody> </table>		Environmental receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and	Complied
	Environmental receptors	Source							
1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and							

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		<table border="1"> <tr> <td data-bbox="1153 363 1198 475"></td> <td data-bbox="1198 363 1400 475"></td> <td data-bbox="1400 363 1912 475">gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> <tr> <td data-bbox="1153 475 1198 619">2</td> <td data-bbox="1198 475 1400 619">Water</td> <td data-bbox="1400 475 1912 619">Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td data-bbox="1153 619 1198 708">3</td> <td data-bbox="1198 619 1400 708">land</td> <td data-bbox="1400 619 1912 708">Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.</td> </tr> </table> <p>The mill was also equipped with a Continuous Emission Monitoring System (CEMS) and yet to be upgraded using i-Remote System.</p> <p>a) The audit team has verified the condition of the CEMS during the audit. It was found the system was malfunction and notification to DOE was made on 21/2/23. Refer to letter dated 21/2/23, ref: ELM/JAS/2023 (01)</p> <p>The system will be upgraded and in the process of installation. This shall be further verified during next assessment.</p>			gases). GHG emission from anaerobic processes (ETP, EFB dumping).	2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.	
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3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.										
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area												
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Guided by SDPB ARM, preparation of replanting using fire is not allowed. Based on site visit at replanting fields of the sampled estates, there was no trace of burning observed. Palm trunks were chipped and windrowed.	Complied									
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	There was no land preparation by burning ever since SDPB practice zero burning as per the policy in: a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation	Complied									

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		<p>b) Group Sustainability and Quality Policy Statement dated Dec 2019, supported by SDP Responsible Agriculture Charter</p> <p>The use of fire for waste disposal and for preparing land for oil palm cultivation or replanting was not practiced in the estate. The Group policy of "Zero open burning" has been enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any replanting. Furthermore, Sime Darby Plantation assigned 1 person based in HQ being in charge to detect any open fire in the Company's fields using the Global Spot Watch. This is the measures taken by the organization to pledge towards zero open burning.</p> <p><u>Process flow for fire incident reporting</u></p> <p>Incident occurrence > SDP hotspot alert team identification > to notify OU > incident details investigated by OU > immediate site verification by OU > OU to report verification status using Fire Hotspot Internal Report (FHIR) > information with geo-tagged photo > reply to hotspot alert team.</p>	
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Both the estate and the mill in SOU 3 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> dated 12/9/2019 and Fire Prevention and Control Measure. Therein containing</p> <ul style="list-style-type: none"> a) Objective b) Activity and prevention c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill 	<p>Non-compliance</p>

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		<p>Engagement process with adjacent stakeholders on fire prevention and control measures was not effectively implemented.</p> <p><u>Kinta Kellas Estate</u></p> <p>Identification of adjacent stakeholders (land owner - durian orchard and private estate owner - PPNP estate) was not updated in the stakeholder map. The said stakeholders were not part of stakeholders consulted during annual stakeholder meeting on 28/12/22. The names were not captured in the latest stakeholder list for FY 2023</p> <p><u>Kamuning Estate</u></p> <p>Identification of adjacent stakeholders (village/community – Kg Trosor and private estate owner - Karai estate) was not updated in the stakeholder map. The said stakeholders were not part of stakeholders consulted during annual stakeholder meeting on 9/2/23. The names were not captured in the latest stakeholder list for FY 2023</p> <p>Thus, a minor NC was issued.</p>	
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>There is no land clearing after November 2005 within SOU3 estates. Nonetheless, PSQM Department have conducted HCV reassessment for SOU 3 on Feb 2017. HCV for estate has been identified and documented in the HCV Re- Assessment for SOU 3 – Elphil, Version 2, February 2017.. The assessment team have confirmed that there is no new planting (refer 7.3.1 to 7.4.2). Hence, the requirement under this indicator does not apply.</p>	<p>Complied</p>

7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new land clearing after 15 Nov 2018 in SOU 3 estates. Hence, the current HCV assessment of the estates remain valid. The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU3 estates. Hence, the requirement under this indicator does not apply.</p>	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU3 estates. Hence, the requirement under this indicator does not apply</p>	Complied
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated</p>	<p>The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU3 estates. Hence, the requirement under this indicator does not apply</p>	Complied

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	<p>agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>												
<p>7.12.6</p>	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The HCV assessment was carried out by SOU 3 on February 2017 by PSQM team. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ul style="list-style-type: none"> a) Overview of HCV assessment b) Description of assessment area <ul style="list-style-type: none"> - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values c) HCV criteria & application to agriculture <ul style="list-style-type: none"> - Visual observation & supporting information - Wildlife in plantation - decision on HCV status d) HCV management / Monitoring. <p>A programme to regularly educate the workforce about the status of RTE species is in place and carried out on annual basis. Latest training was carried out in Kinta Kellas Estate on 4/3/2023 and Kamuning Estate (Changkat Salak) on 22/2/2023. The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the estates within SOU3 are as per below;</p> <table border="1" data-bbox="1137 1270 1917 1331"> <thead> <tr> <th data-bbox="1137 1270 1263 1331">Estates</th> <th data-bbox="1270 1270 1413 1331">Assessed areas</th> <th data-bbox="1420 1270 1518 1331">Area (Ha)</th> <th data-bbox="1525 1270 1697 1331">HCV classification</th> <th data-bbox="1704 1270 1917 1331">Remarks</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estates	Assessed areas	Area (Ha)	HCV classification	Remarks						<p>Complied</p>
Estates	Assessed areas	Area (Ha)	HCV classification	Remarks									

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		Kamuning Estate	Slope/rocky area (Ex-GDSB)	54.33	HCV 4	Promote soil conservation and prevent erosion		
			River reserve (Sg Nyamuk)	3.66	HCV 4	Promote soil conservation and prevent erosion		
			Water Catchment Area	9.25	HCV 4	Provide basic service (water resources) for critical situations		
			Isolated remnant forest	17.35	HCV 4	Promote soil conservation and prevent erosion		
		Elphil Estate	River reserve (Sg Kerdah)	17.27	HCV 4	Promote soil conservation and prevent erosion		
			Mill water catchment	3.529	HCV 4	Provide basic service (water resources) for critical situations		
			Limestone hill and cave	5.627	HCV 3	Promote soil conservation and prevent erosion		
		Kinta Kellas Estate	River reserve (Sg Raya)	2.83	HCV 4	Promote soil conservation and prevent erosion		
			Water Catchment Area	0.86	HCV 4	Provide basic service (water resources) for critical situations		
		Total of HCV area for SOU3			114.706 ha			

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		<p>All areas were sighted and verified. HCV of all above are re-categorized areas from the normal buffer zone category. Hectare for the re-categorized areas has not affected the others category including the planted areas. All the HCVs were maintained by site specific operating units. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, catchment and were documented. Map verification and site visit confirmed that the estate are surrounded by river/straits and villages. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.</p>											
<p>7.12.7</p>	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -</p>	<p>The CU management has established a standard monitoring document. Details provided include the following information:</p> <ul style="list-style-type: none"> a) Area b) Field no and GPS coordinate c) Observation <ul style="list-style-type: none"> - Encroachment /sign of trespassing - Wildlife issues/conflicts/sighting - Pollution /erosion issues d) Maintenance of signage / fence <p>The monitoring being made by the AP during the security rounds in the estate complex. The field staff/Assistant also played a role in providing information during their daily rounds in the fields. Records furnished by the APs were sighted and verified.</p> <table border="1" data-bbox="1153 1220 1910 1343"> <thead> <tr> <th></th> <th>Action steps</th> <th>Action Plan</th> <th>Date</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Inspection of HCV</td> <td>Continuous inspection and recommendation To liase with related agency</td> <td>On-going</td> <td>EM</td> </tr> </tbody> </table>		Action steps	Action Plan	Date	PIC	1	Inspection of HCV	Continuous inspection and recommendation To liase with related agency	On-going	EM	<p>Complied</p>
	Action steps	Action Plan	Date	PIC									
1	Inspection of HCV	Continuous inspection and recommendation To liase with related agency	On-going	EM									

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		2	Protection or conservation & monitoring of biodiversity area.	To continuously collaborate with R& D to monitor the status & health of trees	On-going	EM			
		3	Protection & conservation of mangrove forests area.	To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.	On-going	EM			
		5	Rehabilitation & habitat enhancement	To participate in tree planting divers tree species to enhance the surrounding biodiversity.	On-going	EM			
		6	Interface with animals	Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with <i>Jabatan Perhilitan</i> on wildlife encounter/discovery	On-going	EM			
		7	Education and awareness	Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming	On-going	EM			
<p>*EM – Estate management</p> <p>Summary of monitoring reports by each respective operating unit:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Monitoring records</th> <th>Remarks</th> </tr> </thead> </table>							Estate	Monitoring records	Remarks
Estate	Monitoring records	Remarks							

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		Kamuning Estate	7/2/23, 4/1/23	No encroachment recorded	
		Kinta Kellas Estate	1/1/23, 22/2/2023		
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 3 estates. Hence, the requirement under this indicator does not apply			Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Elphil POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. 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 **2022** for **Elphil POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.50
PK	1.50

Extraction	%
OER	19.80
KER	4.94

Production	t/yr
FFB Process	208,851.60
CPO Produced	41,361.74
PK Produced	10,321.5

Land Use	Ha
OP Planted Area	10,662.76
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	10,662.76

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	46,611.04	0.86	1.94	0.68	0	0	46,807.04	1.45
CO ₂ Emission from fertilizer	4,508.47	0.08	23.89	0.08	0	0	4,532.36	0.16
NO ₂ Emission	2,357.71	0.04	13.91	0.05	0	0	2,371.62	0.09
Fuel Consumption	331.99	0.01	3.03	0.01	0	0	335.02	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-44,181.07	-0.82	-184.72	-0.64	0	0	-44,365.79	-1.46
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	9,628.14	0.18	52.12	0.18	26,270.86	0	35,951.11	0.36

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	40,938.45	0.2
Fuel Consumption	45.93	0
Grid Electricity Utilization	521.89	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	41,506. 27	0.2

Summary of Kernel Crusher Emission and Credit (if applicable)

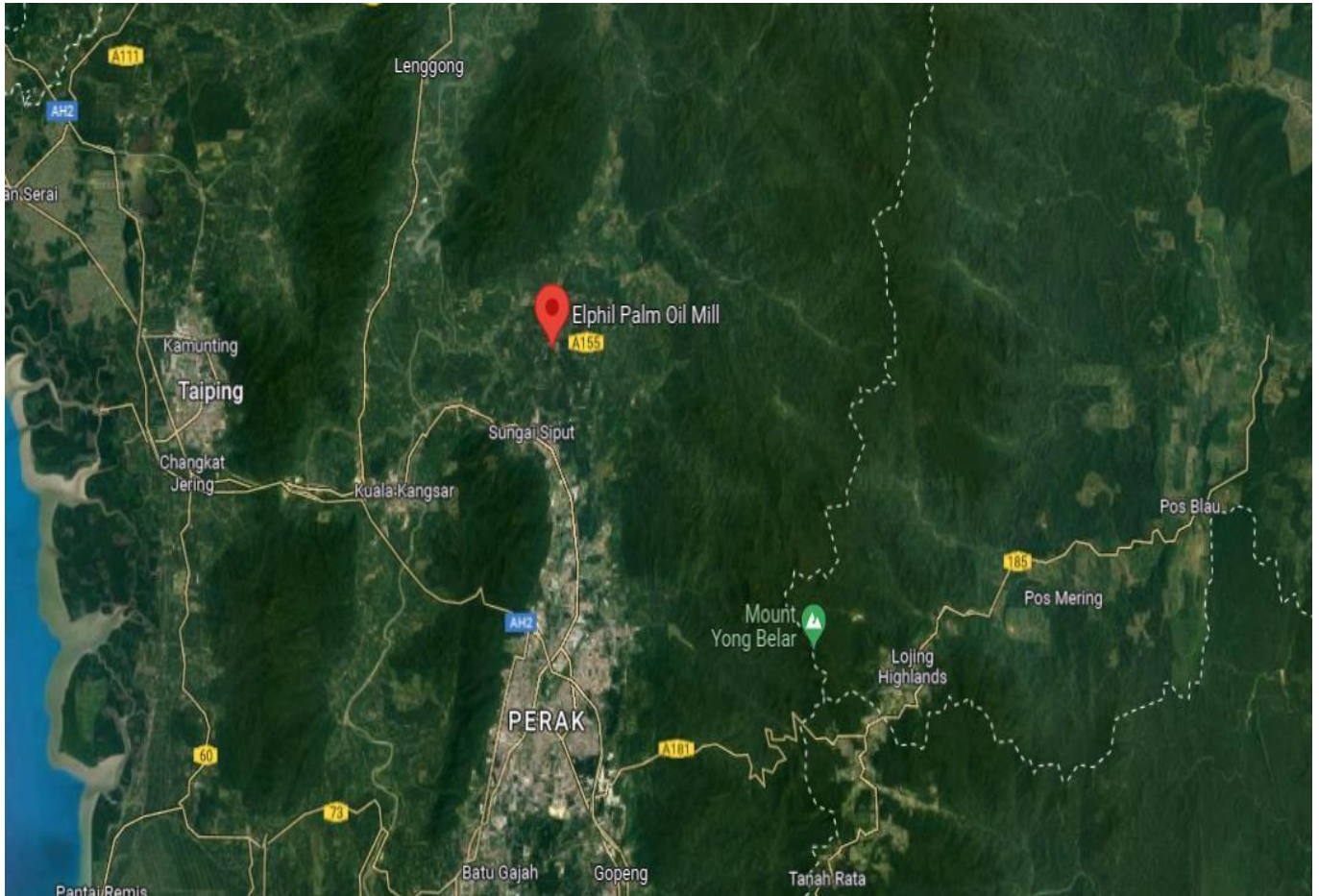
Emissions	tCO ₂ e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

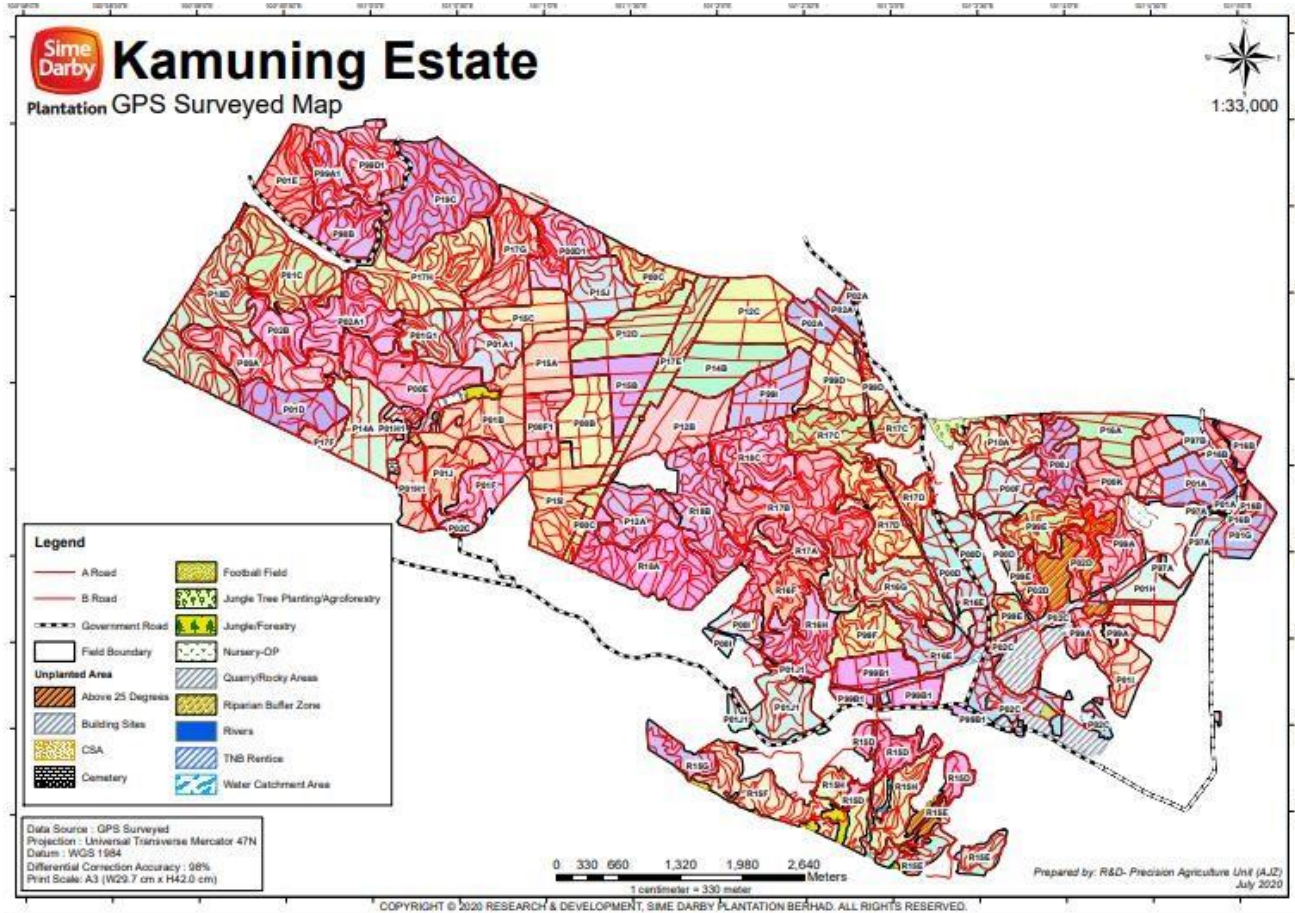
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



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Appendix E: List of Smallholder Registered and/or sampled

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

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure