

**RSPO PRINCIPLE AND CRITERIA –  
3<sup>rd</sup> Annual Surveillance Assessment (ASA 1\_3)  
Public Summary Report**

<b>Sime Darby Plantation Berhad</b>
Level 3A, Main Block, Plantation Tower No. 2, Jalan P.J.U 1A/7 47301 Ara Damansara Selangor, Malaysia
Certification Unit: <b>Strategic Operating Unit (SOU 7) Bukit Kerayong Palm Oil Mill</b>  Location of Certification Unit: Bukit Kerayong Road 42200 Kapar, Klang, Selangor, Malaysia

<b>TABLE of CONTENTS</b>	<b>Page No</b>
Section 1: Scope of the Certification Assessment.....	4
1. Company Details .....	4
2. Certification Information .....	4
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases .....	5
5. Description of Supply Base .....	5
6. Plantings & Cycle.....	5
7. Certified Tonnage of FFB (Own Certified Scope) .....	5
8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *.....	6
9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable .....	6
10. Certified Tonnage .....	6
11. Actual Sold Volume (CPO) (Jan 2018 – Dec 2018) .....	7
12. Actual Sold Volume (PK) (Jan 2018 – Dec 2018).....	7
1. Actual Group certification Claims .....	7
Section 2: Assessment Process .....	8
2.1 Assessment Methodology, Programme, Site Visits.....	8
2.2 BSI Assessment Team: .....	10
2.3 Assessment Plan .....	11
Section 3: Assessment Findings .....	14
3.1 Normative requirement applied for this assessment:.....	14
3.2 Time Bound Plan progress for multiple management units .....	14
3.3 Progress of scheme smallholders and/or outgrowers .....	17
3.4 Details of findings .....	17
3.4.1 Status of Nonconformities Previously Identified and Observations .....	21
3.4.2 Summary of the Nonconformities and Status.....	26
Appendix : Summary of Findings .....	31
Appendix B: Approved Time Bound Plan.....	100
Appendix C: GHG Reporting Executive Summary .....	105
Appendix D: General Chain of Custody Requirements for the Supply Chain.....	107
Appendix E : CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: Identity Preserved ) .....	126
Supply Chain Declaration.....	130
Appendix F: Location Map Bukit Kerayong Palm Oil Mill Certification Unit and Supply bases .....	133

Appendix G: Bukit Kerayong Estate Field Map .....134  
Appendix H: Bukit Cheraka Estate Field Map .....135  
Appendix I: List of Smallholder Sampled.....136  
Not applicable .....136  
Appendix J: List of Abbreviations .....137

## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	06/09/2004
<b>Parent Company Name</b>	Sime Darby Plantation Berhad		
<b>Address</b>	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia		
<b>Subsidiary (Certification Unit Name)</b>	Strategic Operating Unit (SOU 7) – Bukit Kerayong Palm Oil Mill		
<b>Address</b>	Bukit Kerayong Road 42200 Kapar, Klang, Selangor, Malaysia		
<b>Contact Name</b>	Mdm. Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr Senthilkumaran Gopal (Mill Manager)		
<b>Website</b>	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>	<b>E-mail</b>	<a href="mailto:kks.bk.kerayong@simedarbyplantation.com">kks.bk.kerayong@simedarbyplantation.com</a>
<b>Telephone</b>	+603-78484379 (Head Office) +6013-2086959 (Mill)	<b>Facsimile</b>	03-78484356 (Head Office)

2. Certification Information			
<b>Certificate Number</b>	RSPO 550181	<b>Date of First Certification</b>	15/04/2011
		<b>Certificate Start Date</b>	15/04/2016
		<b>Certificate Expiry Date</b>	14/04/2021
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production from Bukit Kerayong Palm Oil Mill and supply base (Bukit Kerayong & Bukit Cheraka Estate)		
<b>Applicable Standards</b>	RSPO P&C MY-NIWG 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D)		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
Mill: MSPO 682049	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	13/03/2023
Plantations: MSPO 690368	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	13/03/2023

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Bukit Kerayong Palm Oil Mill	KKS Bukit Kerayong, Jln Bukit Kerayong 42000 Kapar, Klang, Selangor, Malaysia	3° 11' 12.7" N	101° 22' 29.6" E
Bukit Kerayong Estate	PO Box 204 42200 Kapar, Klang, Selangor, Malaysia	3° 10' 31.3" N	101° 21' 00.5" E
Bukit Cheraka Estate	PO Box 202 45809 Jeram, Selangor, Malaysia	3° 13' 38.6" N	101° 22' 01.7" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Cheraka Estate	3,388.70	55.52	203.40	3,647.62	92.90%
Bukit Kerayong Estate	2,797.76	3.00	211.30	3,012.06	92.88%
<b>Total</b>	<b>6,186.46</b>	<b>58.52</b>	<b>414.70</b>	<b>6,659.68</b>	<b>92.89%</b>

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Cheraka Estate	520.54	1,057.14	1,762.15	48.87	0	2,868.16	520.54
Bukit Kerayong Estate	495.81	2115.4	186.55	0	0	2,301.95	495.81
<b>Total (ha)</b>	<b>1,016.35</b>	<b>3,172.54</b>	<b>1,948.7</b>	<b>48.87</b>	<b>0</b>	<b>5,170.11</b>	<b>1,016.35</b>

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Apr 17 – Apr 18)	Actual (Jan 18 – Dec 18)	Forecast (Apr 18 – Apr 19)
Bukit Cheraka Estate	69,239.47	64,410.53	71,145.50
Bukit Kerayong Estate	59,210.524	56,456.52	59,809.22
Total	128,449.99	120,867.05	130,954.72

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

<b>8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (Apr 17 – Apr 18)</b>	<b>Actual (Jan 18 – Dec 18)</b>	<b>Forecast (Apr 18 – Apr 19)</b>
Sungai Buloh Estate	<b>N/A</b>	716.88	<b>N/A</b>
Tennamaram Estate		323.83	
Bukit Talang Estate		149.35	
Elmina Estate		129.09	
KKS Tennamaram (Ramp balance)		226.43	
<b>Total</b>		<b>1,545.58</b>	

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
<b>Independent FFB Supplier</b>	<b>Tonnage / year</b>		
	<b>Estimated (Apr 17 – Apr 18)</b>	<b>Actual (Jan 18 – Dec 18)</b>	<b>Forecast (Apr 18 – Apr 19)</b>
<b>N/A</b>			
<b>Total</b>			

<b>10. Certified Tonnage</b>			
	<b>Estimated (Apr 17 – Apr 18)</b>	<b>Actual (Jan 18 – Dec 18)</b>	<b>Forecast (Apr 18 – Apr 19)</b>
	<b>Mill Capacity: 30 MT/hr</b>	<b>FFB</b>	<b>FFB</b>
127,904.12		122,412.63	130,954.72
<b>SCC Model: IP</b>	<b>CPO (OER: 20.19%)</b>	<b>CPO (OER: 20.98%)</b>	<b>CPO (OER : 21.00%)</b>
	25,823.84	25,681.96	27,500.49
	<b>PK (KER: 5.50%)</b>	<b>PK (KER: 5.26%)</b>	<b>PK (KER: 5.50%)</b>
	7,034.72	6,439.23	7,202.51

**RSP0 Public Summary Report**  
**Revision 7 (Aug /2018)**

<b>11. Actual Sold Volume (CPO) (Jan 2018 – Dec 2018)</b>					
	RSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>CPO (MT)</b>	23,211.81	-	-	2,387.63	25,599.44

<b>12. Actual Sold Volume (PK) (Jan 2018 – Dec 2018)</b>					
	RSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>PK (MT)</b>	5,433.54	-	-	909.95	6,343.49

<b>1. Actual Group certification Claims</b>		
	Credit	Physical Volume (MT)
<b>IS-CSP0</b>	N/A	N/A
<b>IS-CSPKO</b>		
<b>IS-CSPKE</b>		

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: ASI-ACC-067)  
Unit 3, Level 10, Tower A  
The Vertical Business Suites, Bangsar South  
No. 8, Jalan Kerinchi  
59200 Kuala Lumpur  
Tel +603 2242 4211 Fax +603 2242 4218  
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[www.bsigroup.com](http://www.bsigroup.com)

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards 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 and an office at Jakarta and Australia which involve in RSPO Certification Program.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site annual surveillance assessment was conducted from 22-25/01/2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on 11/03/2019.

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. RSPO Principles & Criterias MYNI 2014 and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (0.8\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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



**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

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 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification 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**

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA 1_1)</b>	<b>Year 3 (ASA 1_2)</b>	<b>Year 4 (ASA 1_3)</b>	<b>Year 5 (ASA 1_4)</b>
Bukit Kerayong Palm Oil Mill	√	√	√	√	√
Bukit Cheraka Estate	√	√	√	√	√
Bukit Kerayong Estate	√	√	√	√	√

**Tentative Date of Next Visit:** January 21, 2020 – January 24, 2020

**Total No. of Mandays:** 10 mandays (including 1 day for mill – SC audit)

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Elzy Ovktafia Chairul	Trainee Lead Auditor	She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI, etc) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.
Mohamad Fadzli Masran	Team Member	He graduated in Bachelor of Forestry Science at University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He had accumulated auditing experience when he was the internal auditor for ISO9001 and ISO14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. During this assessment, he assessed on the aspects of environmental and estate best practise. He is fluent in Bahasa Malaysia and English languages.
Mohamed Zainal Abidin	Team Member	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. Recently, he is involved on the aspects of legal, mill best practices, safety and health, environmental and supply chain for palm oil mill during RSPO assessment.

**Accompanying Persons:**

No.	Name	Role
N/A		

**2.3 Assessment Plan**

Date	Time	Subjects	EO	MH	MF
Tuesday, 22/01/2019  <b>Bukit Kerayong POM</b>	0830-1230	<p><b>Bukit Kerayong POM</b></p> <p><u>RSPO Supply Chain</u></p> <p>Site visit: Incoming of FFB and outgoing of SPO &amp; PK weighbridge, ramp, storage area, loading bays, etc.</p> <p>Documentation review: RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.</p> <p>Interim Closing Briefing for RSPO Supply Chain.</p>	√	√	-
	1230-1330	Lunch	√	√	-
Wednesday 23/01/2019  <b>Bukit Kerayong POM</b>	0830-0900	<p>Opening Meeting:</p> <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize</li> <li>• Audit plan (including stakeholder’s consultation).</li> <li>• Verification on previous audit findings</li> </ul>	√	√	√
	0900–1230	<p><b>Bukit Kerayong POM</b></p> <p>Inspection: FFB receiving, warehouse, workshop, wastes management &amp; Landfill, Effluent Ponds, OSH &amp; ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.</p>	√	√	√
	1230–1330	Lunch	√	√	√

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

Date	Time	Subjects	EO	MH	MF
	1330–1630	<p><b>Bukit Kerayong POM</b></p> <p>Visit to laboratory, weighbridge and palm product storage area.</p> <p>Document Review P1 – P8: SOPs, Supply chain form CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP &amp; implementation etc.</p> <p>Verify previous nonconformities.</p>	√	√	√
	1630–1700	Interim Closing Briefing	√	√	√
Thursday 24/01/2019	0830-1230	<p><b>Bukit Cherakah Estate</b></p> <p>Field visit, boundary inspection, field operations, staff &amp; workers interview, buffer zone, HCV area, IPM implementation, OSH&amp;ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.</p>	√	√	√
	1030–1230	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1230–1330	Lunch	√	√	√
	1330–1630	<p><b>Bukit Cherakah Estate</b></p> <p>Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production &amp; monitoring records, IPM &amp; HCV records, SEIA documents &amp; records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).</p>	√	√	√
	1630–1700	Interim Closing Briefing	√	√	√
Friday 25/01/2019	0830-1230	<p><b>Bukit Kerayong Estate</b></p> <p>Field visit, boundary inspection, field operations, staff &amp; workers interview, buffer zone, HCV area, IPM implementation, OSH&amp;ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.</p>	√	√	√
	1200–1430	Lunch & Friday Prayer	√	√	√

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

Date	Time	Subjects	EO	MH	MF
	1430-1530	<b>Bukit Kerayong Estate</b> Document review P1 – P8: (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).	√	√	√
	1530-1600	Verify any outstanding issues & Preparation for closing meeting	√	√	√
	1600-1700	Closing Meeting	√	√	√

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- Sime Darby Plantation Berhad Time Bound Plan
- RSPO Supply Chain Certification Checklist June 2017
- RSPO P&C MY-NIWG 2014 Checklist

#### 3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	The time bound plan includes all SOUs in Malaysia and Indonesia. Malaysia - Effectively 34 SOUs: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. Indonesia - Effectively 25 SOUs. For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 <sup>st</sup> quarter of 2019.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 <sup>st</sup> quarter of 2019.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.  A new mill has been set up in Liberia and planned for commissioning in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. *RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in completed. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 <sup>st</sup> quarter of 2019.	Yes

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Sime Darby Plantation’s time bound plan for certification is initially 3 years, starting 2008-2011. SDP has had all its SOUs (Malaysian &amp; Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets). The 2 new mills have been RSPO Certified in Jan and Feb 2014. For Indonesian operations, currently, 1 SOU in Indonesia (PT MAS) is pending for RSPO Certification due to social legacy issues. SDP’s is actively working on its certification targets given the span across a large geographical location and over 200 estates and mills in operation.</p> <p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes and a new oil mill in Liberia has been commissioned in Feb 2016. SDP’s time bound plan has been revised to take into consideration the social challenges encountered in Indonesia for the remaining SOU (PT MAS) yet to be certified. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. For Indonesia operation, the reported Case No: DSF 007 between the parties PT Mistra Austral Sejahtera (a subsidiary of Sime Darby Plantation Sdn Bhd) and Kerunang/Entapang community. New status has been updated for dispute tracker for following case, <a href="http://www.rspo.org/members/dispute-settlement-facility/status-of-disputes#007">http://www.rspo.org/members/dispute-settlement-facility/status-of-disputes#007</a></p>	<p>Yes</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>No lapses.</p>	<p>Yes</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>Up to date, there is no comment. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.</p>	<p>Yes</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement after dates defined in NIs Criterion 7.3:  <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with</li> </ul> </p>	<p>HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p>	<p>Yes</p>

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

<p>RSPO P&amp;C criterion 7.3.</p> <p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1st quarter of 2019. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p> <p>*Note: RSPO NPP Announcements for SDP can be found at <a href="http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?">http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</a></p>	<p>Yes</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&amp;C criteria 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>. The progress on the Liabilities shall be verified and reported.</p>	<p>Latest update based on RSPO Case Tracker (19 potential liabilities; 5 LUCA submitted, 1 LUCA is passed, 1 CN submitted, 1 CN approved) on LUCA submission status as per below table:</p> <p style="text-align: center;"><b>SIME DARBY PLANTATION: LUCA SUBMISSION TIMELINE</b></p> <table border="1" data-bbox="614 965 1206 1406"> <thead> <tr> <th>No.</th> <th>PT/ Company</th> <th>Report Submission to RSPO</th> <th>Current Status (14 Aug 2018)</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>PT Lahan Tani Sakti</td> <td>Submitted on 31 May 2017</td> <td>LUCA approved by reviewer</td> </tr> <tr> <td>2.</td> <td>PT Bina Sains Cemerlang</td> <td>Submitted on 29 Sept 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>3.</td> <td>PT Swadaya Andika</td> <td>Submitted on 6 Oct 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>4.</td> <td>PT Langgeng Muara Makmur</td> <td>Submitted on 8 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>5.</td> <td>PT Laguna Mandiri</td> <td>Submitted on 20 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>6.</td> <td>PT Kridatama Lancar</td> <td>Submitted on 22 Sept 2017</td> <td rowspan="19">Shapefiles to be submitted to RSPO by 17 Aug 2018</td> </tr> <tr> <td>7.</td> <td>PT Paripurna Swakarsa</td> <td>Submitted on 29 Sept 2017</td> </tr> <tr> <td>8.</td> <td>PT Sime Indo Agro</td> <td>Submitted on 10 Nov 2017</td> </tr> <tr> <td>9.</td> <td>PT Bhumireksa Nusa Sejati</td> <td>Submitted on 12 Dec 2017</td> </tr> <tr> <td>10.</td> <td>PT Budidaya Agro Lestari</td> <td>Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017</td> </tr> <tr> <td>11.</td> <td>PT Teguh Sempurna</td> <td>Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017</td> </tr> <tr> <td>12.</td> <td>PT Bahari Gembira Ria</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>13.</td> <td>PT Guthrie Peconina Indonesia</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>14.</td> <td>PT Sajang Heulang</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>15.</td> <td>PT Bersama Sejahtera Sakti</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>16.</td> <td>PT Tunggal Mitra Plantation</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>17.</td> <td>PT Ladangrumpun Suburabadi</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>18.</td> <td>PT Aneka Inti Persada</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>19.</td> <td>PT Mitra Austral Sejahtera</td> <td>Submitted on 29 Dec 2017</td> </tr> </tbody> </table> <p>Note: SDP's LUCA is still in queue for review process pending finalization of the contract between RSPO and the reviewer. Sime Darby Plantation has also submitted its RSPO Compensation Plan (CP) for evaluation by RSPO.</p>	No.	PT/ Company	Report Submission to RSPO	Current Status (14 Aug 2018)	1.	PT Lahan Tani Sakti	Submitted on 31 May 2017	LUCA approved by reviewer	2.	PT Bina Sains Cemerlang	Submitted on 29 Sept 2017	Shapefiles submitted to RSPO	3.	PT Swadaya Andika	Submitted on 6 Oct 2017	Shapefiles submitted to RSPO	4.	PT Langgeng Muara Makmur	Submitted on 8 Dec 2017	Shapefiles submitted to RSPO	5.	PT Laguna Mandiri	Submitted on 20 Dec 2017	Shapefiles submitted to RSPO	6.	PT Kridatama Lancar	Submitted on 22 Sept 2017	Shapefiles to be submitted to RSPO by 17 Aug 2018	7.	PT Paripurna Swakarsa	Submitted on 29 Sept 2017	8.	PT Sime Indo Agro	Submitted on 10 Nov 2017	9.	PT Bhumireksa Nusa Sejati	Submitted on 12 Dec 2017	10.	PT Budidaya Agro Lestari	Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017	11.	PT Teguh Sempurna	Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017	12.	PT Bahari Gembira Ria	Submitted on 29 Dec 2017	13.	PT Guthrie Peconina Indonesia	Submitted on 29 Dec 2017	14.	PT Sajang Heulang	Submitted on 29 Dec 2017	15.	PT Bersama Sejahtera Sakti	Submitted on 29 Dec 2017	16.	PT Tunggal Mitra Plantation	Submitted on 29 Dec 2017	17.	PT Ladangrumpun Suburabadi	Submitted on 29 Dec 2017	18.	PT Aneka Inti Persada	Submitted on 29 Dec 2017	19.	PT Mitra Austral Sejahtera	Submitted on 29 Dec 2017	<p>Yes</p>
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<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 6.3.</p>	<p>No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>Yes</p>	<p>Yes</p>																																																																			



### 3.3 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?	N/A	N/A

### 3.4 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the Certification Assessment there were one (1) Major & four (4) Minor nonconformities raised. The Bukit Kerayong 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 Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly during on-site verification on 11/03/2019.

Non-Conformity			
<b>NCR Ref #</b>	1733442-201901-M1	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 4.6.6 Major
<b>Date Issued</b>	25/1/2019	<b>Due Date</b>	24/4/2019
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	11/03/2019
<b>Statement of Nonconformity</b>	The premix chemical was not stored under lock and key.		
<b>Requirement Reference</b>	Storage of all pesticides shall be according to recognized best practices. .		
<b>Objective Evidence</b>	Bukit Cherakah Estate: During site visit at the chemical premixing area, sighted that the premix chemical were not kept under lock and key. The area can be access by any workers and was not secured.		
<b>Corrections</b>	Estate management will install a fencing surround the chemical premix area.		
<b>Root Cause Analysis</b>	The management not aware on the installation of lock area as the establishment premix in big tank proposed earlier is to easier handling and increase the productivity (save time for premixing work).		
<b>Corrective Action</b>	The mixer operator is allowed to enter in the premix area during the operation and the keys will be kept by field staff, G. Davan after finish works. For the safety and security, the AP's is a responsible person to ensure that area in properly order.		
<b>Assessment Conclusion</b>	Yes. During the NCR closure visit conducted on 11 March 2019 at Bukit Cheraka Estate, it was found that the correction and corrective action has been implemented effectively for Major NC. Estate management has installed fences surround the chemical premix area, with proper lock and key. The mixer operator is allowed to enter in the premix area during the operation and the keys will be kept by field		

	staff, G. Devan after finish works. For the safety and security, the AP's is a responsible person to ensure that area in properly order. Sighted the Manager's briefing at Bukit Cloh division on 25.01.2019 on the assignment of foreman & carpenter on the works progress of fences and person in charge.
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Non-Conformity			
<b>NCR Ref #</b>	1733442-201901-N1	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 2.1.3 Minor
<b>Date Issued</b>	25/1/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes/No)</b>	No	<b>Date of nonconformity closure</b>	"Open"
<b>Statement of Nonconformity</b>	Mechanism for ensuring compliance was not effectively implemented.		
<b>Requirement Reference</b>	A mechanism for ensuring compliance shall be implemented.		
<b>Objective Evidence</b>	i) Diesel permit has expired since 18/12/17. Noted a few application for renewal in 2018 for renewal however rejected. The latest application was done on 18/1/19 via BLESS, reference number BL22018030610. ii) Water Abstraction License under Lembaga Urus Air Selangor has expired on 31/7/18. Stipulated in the permit, renewal of permit should be done 3 month before expiry.		
<b>Corrections</b>	Mill management follow up the status of the renewal permit directly to the KPDNKK and LUAS office. The renewal in the midst progress.		
<b>Root Cause Analysis</b>	i) Mill management left out the renewal follow up for diesel permit as it has been rejected from previous application. ii) Mill management left out for water abstraction license renewal - Notification from BLESS system also got problem and pending status in the portal.		
<b>Corrective Action</b>	Mill management will improve and tightly monitor on any follow up matters especially for renewal license or permit. AAO is a person in charge to monitor and renewal process. The renewal will be carry out within three months early before expiry.		
<b>Assessment Conclusion</b>	The effective implementation will be verified in the next surveillance assessment.		

Non-Conformity			
<b>NCR Ref #</b>	1733442-201901-N2	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 6.12.2 Major
<b>Date Issued</b>	25/1/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes/No)</b>	No	<b>Date of nonconformity closure</b>	"Open"
<b>Statement of Nonconformity</b>	The contractor's worker contract has been substituted from original employer to Lotus Two Enterprise Sdn Bhd.		
<b>Requirement Reference</b>	Where applicable, it shall be demonstrated that no contract substitution has occurred.		

<b>Objective Evidence</b>	In BKPOM Worker, sighted that 2 contractor’s worker (employee of Lotus Two Enterprise Sdn Bhd) are having the different employer’s name as below: 1. Nilchan, passport no: BR0129087 valid until 11.03.2019 (Employer: Junjungan Pelangi Sdn Bhd), employed as cleaner. 2. Rahman Md Hafizur, passport no: BQ0685859 valid until 25 July 2019 (Employer: Hua Hin Furniture Manufacture Sdn Bhd) employed as factory worker.
<b>Corrections</b>	Mill management will take immediate action as per below : Terminate the existing contract worker who are not belongs to Lotus Two Enterprise Sdn Bhd.
<b>Root Cause Analysis</b>	All the documentations for the contractor workers is available and monitored by the Mill Management. However we are misunderstanding on the different employer name in the registered permit.
<b>Corrective Action</b>	The SDP in the midst develop the Contractor Worker Management Procedure. Based on the drafted procedure: <ul style="list-style-type: none"> <li>• OU Management to ensure all contracts/ purchase orders contain full terms and conditions which include but not limited to the following: <ul style="list-style-type: none"> <li>• i. To ensure that the workers that the contractor employs possess valid work permit if the workers employed are not Malaysian citizen.</li> </ul> </li> <li>• OU Management to obtain and maintain the photocopy of the following documents from contractors: <ol style="list-style-type: none"> <li>1. Identity Card (IC) for Malaysian</li> <li>2. Passport and valid work permit for non-Malaysian</li> </ol> </li> <li>• OU Management to conduct periodic spot check to ensure that only workers registered with the OU Management are within the premises.</li> </ul>
<b>Assessment Conclusion</b>	The effective implementation will be verified in the next surveillance assessment.

Non-Conformity			
<b>NCR Ref #</b>	1733442-201901-N3	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 4.7.3 Major
<b>Date Issued</b>	25/1/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes/No)</b>	No	<b>Date of nonconformity closure</b>	“Open”
<b>Statement of Nonconformity</b>	Employee awareness regarding the importance of PPE usage are not effectively demonstrated		
<b>Requirement Reference</b>	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.		
<b>Objective Evidence</b>	Bukit Kerayong POM: Sighted during site visit at the boiler, the workers were not wearing proper PPE when supplying the fiber into the boiler. The condition are not conducive as the workers have to inhale the fibre dust throughout the working hours and can cause occupational health disease.		
<b>Corrections</b>	HIRARC been reviewed wisely and accordingly in line with the situation and condition.		

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

<b>Root Cause Analysis</b>	Mill management left out to identify the actual hazard for fiber fuel dust and the actual control measure at boiler station.
<b>Corrective Action</b>	The HIRARC review team consist all the level PIC in the mill and Manager as a chairman. The review will be carry out on quarterly basis (during OSH meeting). The review will discuss the effectiveness of the recommended control.
<b>Assessment Conclusion</b>	The effective implementation will be verified in the next surveillance assessment.

<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1733442-201901-N4	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 4.7.5 Minor
<b>Date Issued</b>	25/1/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes/No)</b>	No	<b>Date of nonconformity closure</b>	"Open"
<b>Statement of Nonconformity</b>	Monitoring of the First Aid Box was not effectively implemented.		
<b>Requirement Reference</b>	Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.		
<b>Objective Evidence</b>	Bukit Cherakah Estate: Sighted during site visit at the harvesting gang (P09), it was noted that the antiseptic solution don't have any information regarding the expiry date. Sighted during site visit at the workshop and premix area (Bukit Cloh Division), it was noted that the antiseptic solution don't have any information regarding the expiry date and the iodine solution was expired.		
<b>Corrections</b>	The estate management will dispose any expired medicine and do a replacement for all items required in the first aid box. The checklist is in accordance Fourth Schedule First Aid Guideline.		
<b>Root Cause Analysis</b>	New Medical Assistant appointed on 2nd January 2019 is in progress clearing all expired medicine as former Hospital Assistant left without replacement since July 2018. The ordering and receiving all clinical item is in progress.		
<b>Corrective Action</b>	To enforce the monthly checking by MA		
<b>Assessment Conclusion</b>	The effective implementation will be verified in the next surveillance assessment.		

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
Nil	

<b>Positive Findings</b>	
<b>PF #</b>	<b>Description</b>
<b>PF 1</b>	Good cooperation from the management team.

**3.4.1 Status of Nonconformities Previously Identified and Observations**

Non-Conformity			
<b>NCR Ref #</b>	1581966-201801-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/03/2018
<b>Statement of Nonconformity:</b>	OSH Plan was not fully implemented.		
<b>Requirement Reference:</b>	A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.		
<b>Objective Evidence:</b>	No audiometric test carry out in 2017 for 35 workers as per recommendation by assessor from the last audiometric test.		
<b>Corrective Actions:</b>	The annual audiometric program will be included in the ESH yearly program. The audiometric was done on 9/2/2018. The OHS program was include the annual audiometric program. Hence, major NC was closed.		
<b>Assessment Conclusion:</b>	<p>Verification during ASA1_3:            The mill has established OSH plan and documented in OSH Management Plan and reviewed on annually basis. The management covered all OSH activities in the mill such as legal and other regulations review, ERP training, HIRARC review, ESH meeting, fire drill, training, medical surveillance and audiometric test. Sighted the implementation of the management plan as follows:</p> <p>i. Medical surveillance for workers involve with chemicals handling were conducted in May and October 2018. All the 8 workers send for surveillance were found fit to continue work as designated job.</p> <p>ii. Audiometric test for workers were conducted on 9/2/2018. 2 workers were found with hearing impairment. Both workers were send for retest on 16/6/2018.</p>		

Non-Conformity			
<b>NCR Ref #</b>	1581966-201801-M2	<b>Clause &amp; Category (Major / Minor)</b>	RSPO SCCS 5.3.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/03/2018
<b>Statement of Nonconformity:</b>	The written procedure (SOP for Sustainable Supply Chain and Traceability, Issue No:2, Dated October 2016) was not adequate and implemented.		
<b>Requirement Reference:</b>	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>		
<b>Objective Evidence:</b>	<p>1. Some of the latest requirements under RSPO SCC System and Standard revised June 2017 have not been incorporated in the SOP such as the requirements of internal audit and etc.</p> <p>2. The internal audit for Supply Chain yet to be conducted by Bukit Kerayong Palm Oil Mill</p>		

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

	3. No specific training related to Supply Chain requirement was conducted at BKPOM
<b>Corrective Actions:</b>	1) The PSQM responsible to up to date the any requirement related in the SCCS. 2) The Internal audit for SCCS will be conducted during the RSPO P&C audit by the PSQM Team. 3) The specific training related with the SCCS has incorporated in the latest SOP.
<b>Assessment Conclusion:</b>	Verification during ASA1_3: Latest revision of SOP, "Sustainable Supply Chain and Traceability" [appendix 15 of the Sustainable Plantation Management System (SPMS)], version 4, dated September 2018 has incorporated all requirements under the new RSPO SCC Standard June 2017. SQM personnel carried out the latest internal audit from 17-20/12/18. The audit team covered all pertinent RSPO SCC elements. The previous major is remain closed.

<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1581966-201801-M3	<b>Clause &amp; Category (Major / Minor)</b>	RSPO SCCS 5.3.2 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/03/2018
<b>Statement of Nonconformity:</b>	The written procedure (SOP for Sustainable Supply Chain and Traceability, Issue No:2, Dated October 2016) was not adequate and implemented.		
<b>Requirement Reference:</b>	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii) effectively implements and maintains the standard requirements within its organization		
<b>Objective Evidence:</b>	i) The procedure for internal audit was not established. The internal audit for Supply Chain yet to be conducted by Bukit Kerayong Palm Oil Mill		
<b>Corrective Actions:</b>	1) To review and include the internal audit procedure in the existing SOP which is specific for the SCCS. 2) The Internal audit for SCCS will be carried out during the RSPO P&C audit by the PSQM Team.		
<b>Assessment Conclusion:</b>	Verification during ASA1_3: Latest revision of SOP, "Sustainable Supply Chain and Traceability" [appendix 15 of the Sustainable Plantation Management System (SPMS)], version 4, dated September 2018 has incorporated all requirements under the new RSPO SCC Standard June 2017. SQM personnel carried out the latest internal audit from 17-20/12/18. The audit team covered all pertinent RSPO SCC elements. The previous major is remain closed		

<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1581966-201801-M4	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.8.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/03/2018
<b>Statement of Nonconformity:</b>	Training plan was not adequate.		

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

<b>Requirement Reference:</b>	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.
<b>Objective Evidence:</b>	The plan was not include specific training for RSPO Supply Chain Standards requirements
<b>Corrective Actions:</b>	To include the SCCS training in the operating unit training plan.
<b>Assessment Conclusion:</b>	Verification during ASA1_3: RSPO SCC training has been identified in the annual training plan. The latest training was carried out on 15/12/18. Continuation of implementation noted, hence the previous major NC is remain closed.

Non-Conformity			
<b>NCR Ref #</b>	1581966-201801-M5	<b>Clause &amp; Category (Major / Minor)</b>	RSPO SCCS 5.8.2 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/03/2018
<b>Statement of Nonconformity:</b>	Training for Supply Chain was not conducted.		
<b>Requirement Reference:</b>	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.		
<b>Objective Evidence:</b>	Specific training for RSPO Supply Chain Standards requirements yet to be conducted		
<b>Corrective Actions:</b>	To include the SCCS training in the operating unit training plan.		
<b>Assessment Conclusion:</b>	Verification during ASA1_3: RSPO SCC training has been identified in the annual training plan. The latest training was carried out on 15/12/18. Continuation of implementation noted, hence the previous major NC is remain closed.		

Non-Conformity			
<b>NCR Ref #</b>	1581966-201801-M6	<b>Clause &amp; Category (Major / Minor)</b>	RSPO SCCS 5.13.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/03/2018
<b>Statement of Nonconformity:</b>	Management Review was not conduct accordingly as per requirement.		
<b>Requirement Reference:</b>	SC 5.13.1: The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.		
<b>Objective Evidence:</b>	Bukit Kerayong Palm Oil Mill yet to conduct the management review meeting		
<b>Corrective Actions:</b>	1) The Management Review meeting, will be conducted after completed the internal audit. 2) To incorporate the specific output or issues need to be concern during the management review meeting process.		
<b>Assessment Conclusion:</b>	Verification during ASA1_3: The latest management review meeting was carried out on 20/12/18 combined with MSPO. All required agenda has been discussed in the meeting. Continuation of implementation noted, hence the previous major NC is remain closed		

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

Non-Conformity			
<b>NCR Ref #</b>	1581966-201801-M7	<b>Clause &amp; Category (Major / Minor)</b>	RSPO SCCS 5.13.2 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/03/2018
<b>Statement of Nonconformity:</b>	The input to management review shall include information on: <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>		
<b>Requirement Reference:</b>	Bukit Kerayong Palm Oil Mill yet to conduct the management review meeting		
<b>Objective Evidence:</b>	PSQM in the midst preparation to develop the latest SOP and to include the latest requirement as mention in the SCCS standard revised June 2017. The management review meeting will be conducted on 1 mac 2018.		
<b>Corrective Actions:</b>	1) To include the clause of the Management Review. To incorporate the specific output or issues need to be concern during the management review meeting process.		
<b>Assessment Conclusion:</b>	Verification during ASA1_3: The latest management review meeting was carried out on 20/12/18 combined with MSPO. All required agenda has been discussed in the meeting. Continuation of implementation noted, hence the previous major NC is remain closed		

Non-Conformity			
<b>NCR Ref #</b>	1581966-201801-M8	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.13.3 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/03/2018
<b>Statement of Nonconformity:</b>	The review output was not evident since the management review was not conduct accordingly as per requirement.		
<b>Requirement Reference:</b>	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>		
<b>Objective Evidence:</b>	Bukit Kerayong Palm Oil Mill yet to conduct the management review meeting		
<b>Corrective Actions:</b>	1) To include the clause of the Management Review. To incorporate the specific output or issues need to be concern during the management review meeting process.		
<b>Assessment Conclusion:</b>	Verification during ASA1_3: Latest for Sustainable Supply Chain and Traceability" [appendix 15 of the Sustainable Plantation Management System (SPMS)], version 4, dated September 2018.has incorporated all pertinent element for the RSPO SCC. Annual management review was carried out on 20/12/18. Thus the major NC is remained closed.		



<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1581966-201801-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.1.2 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18.01.2019
<b>Statement of Nonconformity:</b>	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.		
<b>Requirement Reference:</b>	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.		
<b>Objective Evidence:</b>	BCE and BKE have established and documented their mitigation measures and action plan in Pollution Mitigation Measures (PPP). However, the establishment of the PPP was not based on the Environmental Impact Evaluation (EIE) as required by their procedures which referred to its "Guidance of Action Plan Required" scoring table.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. The implementation the PPP will be reviewed during the internal audit and management review meeting. The potential of non-compliance to be included in the EMP.</li> <li>2. SQM regional will provide coaching to the Management Team of estates.</li> </ol>		
<b>Assessment Conclusion:</b>	Verification during ASA1_3: Implementation of PPP has been reviewed during the last management review on 20/12/18. In addition as part of company commitment towards DOE'S Guided Self-Regulation/GSR , quarterly EPMC (Environmental Performance Monitoring Committee) meeting is being carried out as per operating unit basis. Development of PPP for 2019 is based on the high score of EIE evaluation rating which require identification of action plan. Significant environmental issues from air emission, waste generation and effluent discharge was captured. Thus, the minor NC is effectively closed on 25/1/19.		

<b>Opportunity for Improvement</b>	
<b>OFI#</b>	<b>Description</b>
<b>OFI 1</b>	Null

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1288557M1	Major	4.7.1	RAV: 22/1/2016	Closed on 20/3/2016
1288557M2	Major	5.3.3	RAV: 22/1/2016	Closed on 20/3/2016
1288557M3	Major	5.6.2	RAV: 22/1/2016	Closed on 20/3/2016
1288557M4	Major	6.5.2	RAV: 22/1/2016	Closed on 20/3/2016
1288557M5	Major	4.6.11	RAV: 22/1/2016	Closed on 20/3/2016
1288557M6	Major	4.1.1	RAV: 22/1/2016	Closed on 20/3/2016
1288557N1	Minor	5.6.3	RAV: 22/1/2016	Closed on 19/1/2017
1288557N2	Minor	6.2.3	RAV: 22/1/2016	Closed on 18/1/2017
1288557N3	Minor	4.7.5	RAV: 22/1/2016	Closed on 19/1/2017
1426255-201701-M1	Major	6.5.2	ASA1_1: 19/01/2017	Closed on 14/4/2017
1426255-201701-M2	Major	2.1.1	ASA1_1: 19/01/2017	Closed on 14/4/2017
1426255-201701-M3	Major	5.3.3	ASA1_1: 19/01/2017	Closed on 14/4/2017
1426255-201701-N1	Minor	6.9.3	ASA1_1: 19/01/2017	Closed on 18/01/2018
1426255-201701-N2	Minor	4.6.10	ASA1_1: 19/01/2017	Closed on 18/01/2018
1581966-201801-M1	Major	4.7.1	ASA2_1: 18/01/2018	Closed on 18/03/2018
1581966-201801-M2	Major	SCCS 5.3.1	ASA2_1: 18/01/2018	Closed on 18/03/2018
1581966-201801-M3	Major	SCCS 5.3.2	ASA2_1: 18/01/2018	Closed on 18/03/2018
1581966-201801-M4	Major	SCCS 5.8.1	ASA2_1: 18/01/2018	Closed on 18/03/2018
1581966-201801-M5	Major	SCCS 5.8.2	ASA2_1: 18/01/2018	Closed on 18/03/2018
1581966-201801-M6	Major	SCCS 5.13.1	ASA2_1: 18/01/2018	Closed on 18/03/2018
1581966-201801-M7	Major	SCCS 5.13.2	ASA2_1: 18/01/2018	Closed on 18/03/2018
1581966-201801-M8	Major	5.13.3	ASA2_1: 18/01/2018	Closed on 18/03/2018
1581966-201801-N1	Minor	5.1.2	ASA2_1: 18/01/2018	Closed on 25/01/2019
1733442-201901-M1	Major	4.6.6	25/01/2019	Closed on 11/03/2019
1733442-201901-N1	Minor	2.1.3	25/01/2019	"Open"
1733442-201901-N2	Minor	6.12.2	25/01/2019	"Open"
1733442-201901-N3	Minor	4.7.3	25/01/2019	"Open"
1733442-201901-N4	Minor	4.7.5	25/01/2019	"Open"

**3.5. Stakeholders 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 Bukit Kerayong 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.


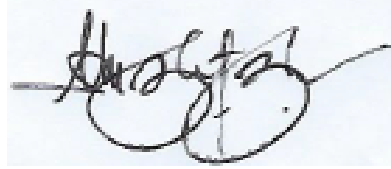
<b>List of Stakeholders Contacted</b>	
<p><b>Internal Stakeholders</b></p> <p>Workers’ Representatives</p> <p>Gender Committee representatives</p>	<p><b>Union/Contractors/Local Communities</b></p> <p>Yih Construction</p> <p>Kampung Bukit Kerayong</p> <p>Lotus Two Enterprise</p>
<p><b>Government Departments</b></p> <p>SJK(T) Bukit Cheraka</p> <p>SMK Jeram</p>	<p><b>NGO</b></p> <p>-</p>

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

IS #	Description
1.	<p><b>Feedbacks:</b>  <u>SJK(T) Bukit Cheraka</u></p> <ol style="list-style-type: none"> <li>1. There are about 140 students in the school. Teacher’s concern on the housing and school gate sometimes closed which resulting students has to take long and unsafety road especially during heavy rain, the condition of road is full with mud.</li> <li>2. 6 wild dogs seen wandering around the school compound.</li> <li>3. School management requested if estate/mill has the unused computer to be considered for school.</li> <li>4. Some students were not attending the school but playing around the school compound. Parents seems not concerning on their children school attendance. School teacher is looking forward to cooperating with estate to give awareness to the parent (estate’s worker) on the importance of education.</li> </ol> <p>School thanking the estate for the assistance in field grass cutting and auxiliary police for sport day.</p> <p><b>Management Responses:</b></p> <ol style="list-style-type: none"> <li>1. This has been discussed during the stakeholder meeting. Estate will consider the request since the gate closed due to cattle issue.</li> <li>2. Already liaised with MDKS on the catchment activity.</li> <li>3. Estate noted and will consider the request.</li> </ol> <p>Estate noted and will consider the request.</p> <p><b>Audit Team Findings:</b>            No further issue.</p>
2.	<p><b>Feedbacks:</b>  <u>SMK Jeram</u>            School would like to express their appreciation on the estate’s contribution of RM 300.</p> <p><b>Management Responses:</b>            Noted on the appreciation.</p> <p><b>Audit Team Findings:</b>            No further issue.</p>
3.	<p><b>Feedbacks:</b>  <u>Yih Construction</u>            Estate has been given a good cooperation to the contractor. They involved in MSPO/RSPO briefing and stakeholder meeting. So far no payment issue and agreement between contractor and estate is valid.</p> <p><b>Management Responses:</b>            Estate will continue the good practices.</p> <p><b>Audit Team Findings:</b>            No further issue.</p>
4.	<p><b>Feedbacks:</b>  <u>Kampung Bukit Kerayong</u>            The issue of cattle is continuously happen as the cattle owner are more than 30 and the total cows are reach 1000. So far stakeholder’s meeting has been discussing this issue and still looking for the effective solution.</p> <p><b>Management Responses:</b>            The cattle issue has been brought up to the government body such as MDKS, Veterinar and Police for enforcement to the cattle owner which come from estate worker and villager and it is still in progress for the win-win solution.</p> <p><b>Audit Team Findings:</b>            Sighted the evidence of minute meeting in stakeholder’s meeting, complaint book, social impact assessment plan and during interview confirmed that this cattle issue has been discussed accordingly.</p>
5.	<p><b>Feedbacks:</b>  <u>Workers’ Representatives</u></p>

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

	<p>Overtime and basic salary were on time and paid accordingly. No discrimination occur between locals and foreign worker as well as among male and female. Estate didn't stop the worker to join any trade union as most are join NUPW.</p>
	<p><b>Management Responses:</b>          Mill and estate will continue the good practices.</p>
	<p><b>Audit Team Findings:</b>          No further issue.</p>
<p><b>6.</b></p>	<p><b>Feedbacks:</b>  <u>Lotus Two Enterprise</u>          The contractor's worker are all foreign worker and some of them are hired through work agent. This is because the immigration did not approve the additional worker's quota request.</p>
	<p><b>Management Responses:</b>          Estate will rectify the issue with the contractor.</p>
	<p><b>Audit Team Findings:</b>          This issue has been raised as non-conformity under contract substitution. Further information please refer to clause 6.12.2</p>
<p><b>7.</b></p>	<p><b>Issues:</b>  <b>Gender Committee</b>          So far no sexual harassment case reported and gender committee members are actively conducting activities for women.</p>
	<p><b>Management Responses:</b>          Management will continue to provide awareness to all the employee on the grievance procedure, case reported and prevention action.</p>
	<p><b>Audit Team Findings:</b>          No other issue.</p>

<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Bukit Kerayong Palm Oil Mill has complied with the RSPO P&amp;C MY-NI 2014 &amp; RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Bukit Kerayong Palm Oil Mill is approved and continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Elzy Ovktafia Chairul	<b>Name:</b> Syed Muzharel Azhar bin Syed Mohamad
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> Sime Darby Plantation Berhad
<b>Title:</b> Trainee Lead Auditor	<b>Title:</b> Chairman, Bukit Kerayong SOU 7
<b>Signature:</b> 	<b>Signature:</b> ( <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> ) 
<b>Date:</b> 22.03.2019	<b>Date:</b> 06.04.2019

**Appendix : Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1:</b> Growers and millers provide 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	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	SOU 7 has conducted meeting with the stakeholder to share any new information on RSPO certification, environmental, social, safety and legal requirement applied to all operating units. All the stakeholders has raised some issue and discussed with the management during the meeting. Sighted the latest minutes meeting conducted on 28/11/2017 and 16/1/2019.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>1.1.2 Records of requests for information and responses shall be maintained.                      -Major compliance</p>	<p><u>BKPOM</u>                      Request by stakeholders were done through meeting, letter and forms. The mill maintain the records of all request and response. Sighted the records of request from the stake holders as follows:                      i. Request of information by DOE during Field Citation through 'Borang Selongkar', JAS/ATOP/1)/2015 dated 29/8/2018 for inspection on Continuous Emission Monitoring System. The mill response through letter dated 4/9/2018.                      ii. Request of information by DOE regarding compliance to Section 31, EQA, regulation environmental quality (clean air) 2014 dated 28/5/2018. Refer letter no. AS 91/110/611/077. The mill response through letter dated 16/7/2018.</p> <p><u>BKE</u>                      Request by stakeholders were done through meeting, letter, form and visit book. All the issue were recorded in the record book. Sighted the records for request as follows:                      i. Complaint from SJKT Ladang Brafferton regarding the palm frond encroaching the school area. The estate has taken the action on 18/1/2019.                      ii. Request from SJKT Ladang Brafferton for grass cutting at the field school area. The estate has taken action on 23/1/2019                      iii. DOSH visit for renewal permit for air compressor. All compressor were fit to be used in the estate.</p>	<p>Complied</p>
<p><b>Criterion 1.2:</b>                      Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>		



Criterion / Indicator		Assessment Findings	Compliance
1.2.1	Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans (Criterion 8.1);</li> <li>• Public summary of certification assessment report;</li> <li>• Human Rights Policy (Criterion 6.13).</li> </ul> - Major compliance –	<p>There was no restriction noted as to the documents made available to the public except private and confidential information. The public can browse through the internet to access to public information such as policies and corporate social responsibility.</p> <p>Other than that, the policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p>	Complied
<p><b>Criteria 1.3:</b>                      Growers and millers commit to ethical conduct in all business operations and transactions.</p>			
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	<p>SDPSB has implemented policy on code of ethical conduct and integrity (Code of Business Conduct- COBC) which covered all operations in the plantation operation. Briefing session was given to all workers at visited operating units.</p> <p>For example, briefing of policies were given to the mill workers on 07.01.19 and during induction training prior to work for the new workers.</p> <p>During morning briefing, BKPOM has conducted the SDP Policy refreshment and COBC Sime Darby on 07.01.19 attended by 49 workers.</p> <p>For Bukit Cheraka Estate, the COBC briefing was conducted on 16.01.17 to all 132 attendees and for Bukit Kerayong Estate was on 14.12.2018 to all workers.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 2: Compliance with applicable laws and regulations</b>		
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.		

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available.          - Major compliance -</p>	<p>SOU7 had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and PSQM sustainability team. SOU7 had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:</p> <p><u>Bukit Kerayong POM</u>          1) DOE licence no. 003124, reference number, AS(B)31/152/000/067; licensing period: 1/7/18 – 30/6/19. Method of discharge: land application (BOD3 limit @ 30°C is 5,000 mg/l.          2) MPOB license: 562906004000 (validity period 1/8/2018 – 31/07/2019) for 180,000MT.          3) Energy commission license no: 2018/01070; serial no: 28695 (validity period 25/05/2018 – 24/05/2019) for 2,640 kW installation capacity.          4) There are 12 CFs belonged to the mill covering various equipment such as air receivers, steam separators, hoist and crane, sterilisers, multitubular underfired, unfired multitubular etc. [ref.: Lampiran – SL/BIL/18/30618 – myKKP system]. Sample of CF checked:          - Boiler@ multi tubular underfired (PMD 1266, inspected on 18/10/18 waiting for CF issuance)          - Boiler@ unfired multitubular (PMD 2179, inspected on 18/10/18 waiting for CF issuance)          - Back pressure receiver (SL PMT 3763 valid until 7/1/20)          - Hoist (PMA 3075 valid until 7/1/20)          Some of the UPVs were exempted for inspection based on FMA (Steam Boiler and Unfired Pressure Vessel) Exemption Order 2017.</p> <p><u>Bukit Cheraka Estate</u>          1) MPOB license: 526188002000, <i>Menjual dan Mengalih FFB</i>, 1,604 Ha, licence holder: Ladang Bukit Cheraka (validity period 01/02/2019 – 31/01/2020).          2) MPOB license: 508324102000, <i>Menjual dan Mengalih FFB</i>, 2,028.29 Ha, licence holder: Ladang Bukit Cloh (validity period 01/03/2019 – 29/02/2020).</p>	<p>Complied</p>
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**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

Criterion / Indicator	Assessment Findings	Compliance
	<p>3) MPOB license: 589377011000, <i>Menghasilkan, Menjual dan Mengalih, and Menyimpan SLGBIJI, SLGTISU</i>, licence holder: Ladang Bukit Cheraka (validity period 01/10/2018 – 30/09/2019).</p> <p>4) Diesel Permit # B010150, ref B.PGK.SEL/5300 (validity 20/01/2018 – 19/01/2019) Quantity: 10,000 litre. Renewal of license through BLESS, ref# BL22019002330 and approval is still in progress.</p> <p>5) Diesel Permit # PUTRAJAYA 000701, ref B.PGK.SEL/5300 (validity 31/1/2018 – 30/1/2019) Quantity: 9,100 litre. Renewal of license through BLESS, ref# BL22019002348 and approval is still in progress.</p> <p>6) DOA Permit to Purchase of Acephate Quantity: 1,000kg, ref#: SEL/2018/ACP/0068(GL), validity period 30/11/2018 – 20/12/2018, supplier: Hextar Chemicals Sdn Bhd.</p> <p>7) Permit to purchase and stored Acephate for bagworm treatment. Refer permit no. SEL/2018/ACP/0068(GL). Validity period from 30/11/2018 till 20/12/2018.</p> <p>8) Permit to purchase and stored Acephate for bagworm treatment. Refer permit no. SEL/2018/ACP/0020(GL). Validity period from 26/3/2018 till 15/4/2018.</p> <p><u>Bukit Kerayong Estate</u></p> <p>1) MPOB license: 525572002000 (validity period 01/01/2019 – 31/12/2019), Menjual dan Mengalih FFB, holder: Ladang Bukit Kerayong, 3,368.5 Ha.</p> <p>2) Diesel Permit # B010128, ref B.PGK.SEL/00533 (validity 8/1/2018 – 7/1/2019) Quantity: 10,000 litre. Renewal of license through BLESS, ref# BL22019002981 and approval is still in progress</p> <p>3) Diesel Permit # B010130, ref B.PGK.SEL/00533 (validity 8/1/2018 – 7/1/2019) Quantity: 3,000 litre. Renewal of license through BLESS, ref# BL22019002980 and approval is still in progress</p> <p>4) CF for unfired pressure vessel/air compressor, SL PMT 21471, valid until 6/2/20.</p>	

Criterion / Indicator		Assessment Findings	Compliance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	SOU7 continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that are applicable to the CU operation [ref.: Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008]. Each office of the operating unit (mill and estates) has its own LORR and were being evaluated individually annually for compliance and it can be accessed by all levels of staff. Latest legal and other requirements register (LORR) dated 23/1/19 was sighted at Bukit Kerayong POM. The latest update has included Factory and Machinery (Steam Boiler and Unfired Pressure Vessel) Regulation 2017 and the new Minimum Wages Order 2018 in the register.	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	All legal and other requirements registered in the LORR. Periodically, SOU7 assigned its personnel to cross check the status of compliance against the LORR through various ways such as internal audit, routine inspections, etc. Whenever there is non-compliance detected, appropriate actions will be taken to address the issue.  However, mechanism for ensuring compliance was not effectively implemented as below:  i) Diesel permit has expired since 18/12/17. Noted a few application for renewal in 2018 for renewal however rejected. The latest application was done on 18/1/19 via BLESS, reference number BL22018030610.  ii) Water Abstraction License under Lembaga Urus Air Selangor has expired on 31/7/18. Stipulated in the permit, renewal of permit should be done 3 month before expiry.	Minor non conformance

Criterion / Indicator		Assessment Findings	Compliance
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group's Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Information and implementation date of the new Minimum Wages Order 2018 has been communicated by Group HR on 4 <sup>th</sup> January 2019 to all Sime Darby Plantation Berhad SOUs via email/secular. Effective date of implementation is on 1 <sup>st</sup> January 2019.	Complied
<b>Criterion 2.2:</b> 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.			

Criterion / Indicator	Assessment Findings	Compliance												
2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	<p>SOU7 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates has a list of all its land titles which have the information about names of lease, hectare, terms &amp; conditions, lease period and grant numbers. Copies of the land titles were available at the estate’s offices while the original were kept at headquarter.</p> <p>Example of land titles checked:</p> <table border="1" data-bbox="931 624 1852 1267"> <thead> <tr> <th data-bbox="931 624 1077 657">Estate</th> <th data-bbox="1077 624 1417 657">Land title</th> <th data-bbox="1417 624 1704 657">Land use type</th> <th data-bbox="1704 624 1852 657">Tenure</th> </tr> </thead> <tbody> <tr> <td data-bbox="931 657 1077 1043">Bukit Cheraka</td> <td data-bbox="1077 657 1417 1043">           Sample : GRN45562, lot no. 4503, Mukim Jeram, District: Kuala Selangor title area: 343.70 ha            Total titles: 28 (1,633.09 ha)            Sample : GRN47691, lot no. 4586, Mukim Jeram, District: Kuala Selangor title area: 273.7694 ha            Total titles: 105 (2,104.34 ha)         </td> <td data-bbox="1417 657 1704 1043">Agriculture &amp; not categorized/gazetted</td> <td data-bbox="1704 657 1852 1043">Freehold</td> </tr> <tr> <td data-bbox="931 1043 1077 1267">Bukit Kerayong</td> <td data-bbox="1077 1043 1417 1267">           Sample : GRN52712, lot no. 2894, Mukim Jeram, District: Kuala Selangor title area: 11.71 ha            Total titles: 21 (3,368.5 ha)         </td> <td data-bbox="1417 1043 1704 1267">Agriculture &amp; not categorized/gazetted</td> <td data-bbox="1704 1043 1852 1267">Freehold</td> </tr> </tbody> </table>	Estate	Land title	Land use type	Tenure	Bukit Cheraka	Sample : GRN45562, lot no. 4503, Mukim Jeram, District: Kuala Selangor title area: 343.70 ha Total titles: 28 (1,633.09 ha) Sample : GRN47691, lot no. 4586, Mukim Jeram, District: Kuala Selangor title area: 273.7694 ha Total titles: 105 (2,104.34 ha)	Agriculture & not categorized/gazetted	Freehold	Bukit Kerayong	Sample : GRN52712, lot no. 2894, Mukim Jeram, District: Kuala Selangor title area: 11.71 ha Total titles: 21 (3,368.5 ha)	Agriculture & not categorized/gazetted	Freehold	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of SDPSB to indicate the legal boundaries are through construction of trenches. This was confirmed through the field visit at Bukit Kerayong and Bukit Cheraka estates. Apart from that, erection of pegs painted with red and white along the boundaries was also commonly practiced.	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute recorded. This was verified with stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute recorded. This was verified with stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute recorded. This was verified with stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute recorded. This was verified with stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied



Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 2.3:</b>			
Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	The map of the land portion is provided together with the land title. The map has provided the coordinated demarcation.	Complied

Criterion / Indicator	Assessment Findings	Compliance
2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for 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 company's title, concession or lease on the land. - Minor compliance -	There is no customary land for the portion of land.	Complied
2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There is no customary land for the portion of land.	Complied

Criterion / Indicator		Assessment Findings	Compliance
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no customary land for the portion of land.	Complied
<b>Principle 3: Commitment to long-term economic and financial viability</b>			
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	<p>The mill has established forecast business plan for five financial years from FY 2018 till 2023 as guideline for the mill to run the operation. Plan was review on annually basis. The plan covers the FBB process, cost for labour, mill maintenance, EVIT and administration cost.</p> <p>The estates visited has established forecast business plan for five financial years from FY 2018 till 2023 as guideline for the estates to run the daily operation and documented in the MPLAN. The plan was reviewed on annually basis. The business plan covers the Area statement, Crop production, Field maintenance cost, Harvesting, FFB transportation, Labour benefits/cost and administration cost.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
3.1.2 An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	<p>SOU 7 have long range replanting programme until FY 2024. Replanting planned for the palm older than 25 years, non-performance field (yield) and Ganoderma infected palm. Observed the replanting programme for the next financial year as follows:</p> <p><u>BCE</u>            2019: 87.91 ha for field 01B and 02A            2020: 134.44 ha for field 98B and 00            2021: 192.90 ha for field 98A and 01            2022: 144.06 ha for field 97A, 01E            2023: 138.06 ha for field 01A, 01C and 01D</p> <p><u>BKE</u>            2023: 186.55 ha for field 02A, 02B, 02C and 03A</p>	Complied
<p><b>Principle 4: Use of appropriate best practices by growers and millers</b></p>		
<p><b>Criterion 4.1:</b>            Operating procedures are appropriately documented, consistently implemented and monitored.</p>		
4.1.1 Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	<p>SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill.</p> <p>Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc. Noted updated procedure under SOP for water analysis and RSPO SCCS procedure:</p> <p>i) SPMS, Appendix 7: SOP for water quality monitoring, issue: 2 dated 1/6/16.            SOP for sampling guideline            ii) Water and Wastewater Sampling Guideline, issue: 1 dated 1/6/16.            iii) RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version: 2, issue: 2 dated October 2016.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	Plantation Advisory Department, Performance Monitoring Unit, Quality Management Unit (PSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.	Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	Operating units visited maintain all records of monitoring and available for review.  <u>BKPOM</u> Mill advisor visit was conducted twice a year. Latest visit was conducted on 31/5 - 1/6/2018 and 5 - 6/12/2018. The report covers on the OER, KER, oil and kernel losses, mill throughput, FFB processed, plant and machinery upkeep, CPO and kernel quality, cost of production and compliancy to legal and regulation. Performance Monitoring Unit visit on quarterly basis. Latest visit was conducted in 23-27/12/2018. No major issue raised during the visit. All areas of concern raised has been addressed by the mill  <u>BCE</u> Latest Plantation Advisor visit was conducted on 4-6/9/2018. Refer report no. SOU 7/BCE/01/2018. No major issue raised during the visit. The report cover on yield improvement, crop recovery, OER improvement and replant and immature field upkeep. Performance Monitoring Unit visit on quarterly basis. Latest visit report for December 2018. Refer report dated 3/12/2018. No major issue raised during the visit.  <u>BKE</u> Latest Plantation Advisor visit was conducted on 29-31/10/2018. Refer report no. SOU 7/BKE/01/2018. No major issue raised during the visit with score ratings at 77.50. Performance Monitoring Unit visit on quarterly basis. Latest visit report for December 2018. Refer report dated 3/12/2018. No major issue raised during the visit.	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	No third party FFB received. All the FFB are from own certificate scope and adjacent Sime Darby certified estates.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.2:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.2.2	<p>Records of fertiliser inputs shall be maintained.            - Minor compliance -</p>	<p>Fertilizer application program is based on the recommendation by Agronomist and documented in Agronomic and Fertilizer Recommendation Report. Observed the recommendation and implementation record for FY 2018:</p> <p><u>BCE</u>            Fertiliser application as per Agronomist recommendation in Agronomic and Fertiliser Recommendations Report. Observed the application vs programme records.</p> <p>Field – 2004A            Fertiliser Type – MOP            Rate – 2.00 kg            Month Programme – Aug - Oct 2018            Month Applied – Jan 2019</p> <p>Field – 2009A            Fertiliser Type – AC            Rate – 1.75 kg            Month Programme – Aug - Oct 2018            Month Applied – Dec 2018</p> <p><u>BKE</u>            Field – 2009H, 2009I, 2009J            Fertiliser Type – Borate            Rate – 2.00 kg            Month Programme – Apr 2018            Month Applied – Apr – May 2018</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.3</p> <p>There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status.</p> <p>- Minor compliance -</p>	<p>Plant Nutrition and Protection Unit (PNU) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation. The report attached with Agronomic and Fertiliser Recommendation Report. Soil analysis carried out at 5 years interval as per company S.O.P by Sime Darby Research Sdn. Bhd.</p> <p><u>BCE</u>            Latest leaf sampling has been carried out in Aug 2018. Foliar nutrient status was enclosed with Agronomic and Fertiliser Recommendation Report dated 20/12/2018.</p> <p><u>BKE</u>            Latest leaf sampling has been carried out in Mar and Apr 2018. Foliar nutrient status was enclosed with Agronomic and Fertiliser Recommendation Report dated 20/12/2018.            Latest soil analysis has been carried out on 10/4/2014. Refer report no S26/2014 dated 11/7/2014.</p>	<p>Complied</p>
<p>4.2.4</p> <p>A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.</p> <p>- Minor compliance -</p>	<p>Sime Darby has established nutrient recycling program. EFB was used as organic fertiliser for immature oil palm and documented in Agriculture Reference Manual issue no. 1, version 3 dated 1/7/2011 under Section - Manuring.</p>	<p>Complied</p>
<p><b>Criterion 4.3:</b>            Practices minimise and control erosion and degradation of soils.</p>		



Criterion / Indicator	Assessment Findings	Compliance
4.3.1	<p>Maps of any fragile soils shall be available. - Major compliance -</p> <p>Soil series map available. Refer to soil series map prepared by R&amp;D-TTAS Precision Agriculture Unit (NHM). There are no peat soils or soil categorised as problematic or fragile soil at all estates. Soil series summary as follow:</p> <p><u>BCE</u> Bernam 27.38%, Bungor 0.24%, Colluvioum 1.56%, Jawa 12.76%, alluvium 3.81%, Mallaca 1.02%, Munchong 0.19%, Organic Clay 5.77%, Sedu 1.62%, Selangor 4.78%, Serdang 1.69%, Tongkang 10.73%, unclassified 27.13%</p> <p><u>BKE</u> Bernam 28.26%, BriaH 38.35%, Jawa 2.45%, Kangkong 2.19%, Sedu 6.94%, Selangor 7.82% Serdang 0.80%, Tongkang 7.57%, Unclassified 5.67%.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance												
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	<p>The company has established SOP for planting on slopes, documented in Agricultural Reference Manual ver. 1 Section 4 issued on 1/7/2018.</p> <table border="1"> <thead> <tr> <th>Slopes (degree)</th> <th>Terrace Width (meters)</th> </tr> </thead> <tbody> <tr> <td>&lt;2</td> <td>Straight Planting</td> </tr> <tr> <td>2 – 6</td> <td>Straight Planting. Water conservation terrace at 32 m interval</td> </tr> <tr> <td>6 -12</td> <td>5</td> </tr> <tr> <td>12 – 18</td> <td>4.3</td> </tr> <tr> <td>18 - 25</td> <td>3.6</td> </tr> </tbody> </table> <p>Areas with greater than 25 degree slopes should not be planted but be left out for biodiversity purpose.            Area at both estate visited with slope &gt;25° planted through terracing.</p>	Slopes (degree)	Terrace Width (meters)	<2	Straight Planting	2 – 6	Straight Planting. Water conservation terrace at 32 m interval	6 -12	5	12 – 18	4.3	18 - 25	3.6	Complied
Slopes (degree)	Terrace Width (meters)														
<2	Straight Planting														
2 – 6	Straight Planting. Water conservation terrace at 32 m interval														
6 -12	5														
12 – 18	4.3														
18 - 25	3.6														
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Both estate visited has established road maintenance program to ensure the road are in good condition to ensure the estate operation run smoothly in all-weather condition. The programme include road grading, resurfacing and road site pruning. The work were programmed throughout the year. Roads inspected during field audit are generally in a good condition.	Complied												
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at both estates visited.	Complied												
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at both estates visited.	Complied												

Criterion / Indicator		Assessment Findings	Compliance
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at both estates visited.	Complied
<b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.			

<p>4.4.1</p>	<p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>Water management plan revision date 2/1/19 incorporated plan to reduce and contingency measures for during flood and drought season.</p> <p>Water reduction plan for 2019</p> <table border="1" data-bbox="887 491 1872 790"> <thead> <tr> <th>Area</th> <th>Reduction plan</th> <th>PIC/time frame</th> </tr> </thead> <tbody> <tr> <td>Use of clean water at clarification station</td> <td>Condensate water recycle for dilution</td> <td>Mill Assistant/On-going</td> </tr> <tr> <td>Mill cleaning</td> <td>Weekend mill washing using tube well</td> <td>Mill Assistant/On-going</td> </tr> <tr> <td>Mill compound</td> <td>Use of sweep and blower for cleaning</td> <td>Mill Assistant/On-going</td> </tr> <tr> <td>Linesite water leakage</td> <td>Continuous communication during morning briefing</td> <td>Mill Assistant/On-going</td> </tr> </tbody> </table> <p>Water Contingency Plan for 2019</p> <table border="1" data-bbox="887 855 1872 1281"> <thead> <tr> <th>Scenario</th> <th>Action Plan</th> <th>PIC/time frame</th> </tr> </thead> <tbody> <tr> <td>Drought season</td> <td>i) Use of water from reserved tank ii) Use water from tube well iii) Use of water from rain harvesting pond iv) Purchase water from government water</td> <td>Mill Assistant/On-going</td> </tr> <tr> <td>Flood</td> <td>i)Desilting on regular basis ii)Deepening and widening of drain iii)Evacuate resident to higher ground</td> <td>Mill Assistant/On-going</td> </tr> </tbody> </table> <p>Water management plan: Contingency plan during water shortage for financial year 2017/2018 for Elphil POM date 3/7/17 has include:</p>	Area	Reduction plan	PIC/time frame	Use of clean water at clarification station	Condensate water recycle for dilution	Mill Assistant/On-going	Mill cleaning	Weekend mill washing using tube well	Mill Assistant/On-going	Mill compound	Use of sweep and blower for cleaning	Mill Assistant/On-going	Linesite water leakage	Continuous communication during morning briefing	Mill Assistant/On-going	Scenario	Action Plan	PIC/time frame	Drought season	i) Use of water from reserved tank ii) Use water from tube well iii) Use of water from rain harvesting pond iv) Purchase water from government water	Mill Assistant/On-going	Flood	i)Desilting on regular basis ii)Deepening and widening of drain iii)Evacuate resident to higher ground	Mill Assistant/On-going	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance												
		<p>i) Water shortage/dry spell</p> <ul style="list-style-type: none"> <li>- Purchase water from Lembaga Air Perak (LAP)</li> <li>- Train staff/workers to conserve water</li> <li>- To proposed tube well application</li> </ul> <p>ii) Severe water pollution</p> <ul style="list-style-type: none"> <li>- Water supply to be purchased from Lembaga Air Perak</li> <li>- To perform treatment of polluted water</li> </ul> <p>At POM, existing plan to reduce water usage dated 5/1/18 was verified.</p> <p>i) Rain water collection/harvesting – use for floor cleaning</p> <p>ii) Turbine cooling water – recycled water for mill processing</p>													
4.4.2	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.</p> <p>- Major compliance -</p>	<p>Documented as a Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/ivers, version 1, year 2008, issue no. 1, dated 1/11/2008.</p>	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters	Complied
River width	Buffer zone														
> 40 meters	50 meters														
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**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

Criterion / Indicator		Assessment Findings	Compliance
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	Effluent Analysis conducted by Sime Darby Research and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. Total of 11 parameters (pH, TA, VFA, BOD, COD, TS, SS, VSS, TN, AN and O&G) tested. Latest analysis report for December 2018 was checked. Refer to test report# EP533/2018 date issue 20/12/18. BOD for final discharge is 79 mg/l vs limit 5000 mg/l.  Quarter return report submitted on quarterly basis to DOE. The final quarter (Q4) 2018 report available for review. Refer to report dated 13/1/19.	Complied
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from water catchment by using pump. An average of 2.11 m <sup>3</sup> water is used to process per mt of FFB recorded from July 2018 to December 2018.	Complied
<b>Criterion 4.5:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.			

Criterion / Indicator	Assessment Findings	Compliance
4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. Estate visited has established IPM Management plan and documented Work Program Book. Sighted the implementation of the IPM program FY 2018 as follows:</p> <p><u>BCE</u></p> <p>i. Barn Owl Census was conducted in August 2018. Occupancy rate was recorded at 56.44%. Barn owl box replacement was conducted for damage boxes. ii. Sighted the planting of beneficial plant such as Cassia Cobanensis, Tunera Subulata, and Antigonan Leptopus during site visit. Noted the records of beneficial plant planting for the month of July, August, September and October 2018.</p> <p><u>BKE</u></p> <p>i. Barn Owl Census was conducted in August 2018. Occupancy rate was recorded at 85%. Barn owl box replacement was conducted for damage boxes. ii. The rat baiting was programmed at every 6 months. Sighted records of rat baiting campaign for field 2014F, 2014E and 2009C.</p>	Complied
4.5.2 Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>The estate visited has conducted training for those who involve in IPM implementation to ensure the effectiveness of the implementation. the training was conducted by the Manager, Asst. Manager, Agronomist, Executives and supplier with knowledge in oil palm plantation. Sighted the training records as follows:</p> <p><u>BCE</u></p> <p>i. Pest and Disease training for oil palm nursery dated 10/7/2018</p> <p><u>BKE</u></p> <p>i. Bagworm census training dated 6/6/2017 ii. Acephate usage and trunk injection training dated 27/8/2018</p>	Complied
<p><b>Criterion 4.6:</b> Pesticides are used in ways that do not endanger health or the environment</p>		

Criterion / Indicator	Assessment Findings	Compliance
4.6.1	<p>Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available.</p> <p>- Major compliance -</p> <p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease. Some of recommended pesticides are:</p> <p>Immature planting (sample)</p> <ul style="list-style-type: none"> <li>- General weeds : Glyphosate</li> <li>- Pennisetum polystachion : Metsulfuron Methyl</li> <li>- Stenochlaena palustris : Sodium chlorate</li> </ul> <p>Mature planting</p> <ul style="list-style-type: none"> <li>- Grass weed and Asystasia : glyphosate &amp; 2,4-D amine</li> </ul> <p>The selection is also evaluated by the agronomist during his visit to the estate.</p>	Complied



Criterion / Indicator	Assessment Findings	Compliance																																																	
<p>4.6.2 Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided.                      - Major compliance -</p>	<p>Estates visited monitored the usage of pesticides monthly and recorded in Pesticides usage/ha. Observed the pesticides usage records FY 2018 as follows:</p> <p><u>BCE</u></p> <table border="1" data-bbox="887 523 1330 794"> <thead> <tr> <th>Month</th> <th>Pesticides Usage/Ha</th> </tr> </thead> <tbody> <tr> <td>Jan 18</td> <td>0.7852</td> </tr> <tr> <td>Feb 18</td> <td>0.5420</td> </tr> <tr> <td>Mac 18</td> <td>0.8107</td> </tr> <tr> <td>Apr 18</td> <td>0.7519</td> </tr> <tr> <td>May 18</td> <td>0.7964</td> </tr> <tr> <td>Jun 18</td> <td>0.3775</td> </tr> </tbody> </table> <p><u>BKE</u></p> <table border="1" data-bbox="887 858 1720 1129"> <thead> <tr> <th></th> <th>Glyphosate</th> <th>Sodium Chloride</th> <th>Cyphermethrin</th> <th>Glufosinate-ammonium</th> </tr> </thead> <tbody> <tr> <td>Jul 18</td> <td>0.097</td> <td>4.665</td> <td>0.128</td> <td>0.124</td> </tr> <tr> <td>Aug 18</td> <td>0.429</td> <td>5.921</td> <td>0.084</td> <td>0.086</td> </tr> <tr> <td>Sep 18</td> <td>0.343</td> <td>0.897</td> <td>0.084</td> <td>0.070</td> </tr> <tr> <td>Oct 18</td> <td>0.333</td> <td>1.615</td> <td>0.024</td> <td>0.052</td> </tr> <tr> <td>Nov 18</td> <td>0.247</td> <td>1.794</td> <td>0.024</td> <td>0.166</td> </tr> <tr> <td>Dec 18</td> <td>0.290</td> <td>1.974</td> <td>0.004</td> <td>0.157</td> </tr> </tbody> </table>	Month	Pesticides Usage/Ha	Jan 18	0.7852	Feb 18	0.5420	Mac 18	0.8107	Apr 18	0.7519	May 18	0.7964	Jun 18	0.3775		Glyphosate	Sodium Chloride	Cyphermethrin	Glufosinate-ammonium	Jul 18	0.097	4.665	0.128	0.124	Aug 18	0.429	5.921	0.084	0.086	Sep 18	0.343	0.897	0.084	0.070	Oct 18	0.333	1.615	0.024	0.052	Nov 18	0.247	1.794	0.024	0.166	Dec 18	0.290	1.974	0.004	0.157	<p>Complied</p>
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<p>4.6.3 Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.                      - Major compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.</p>	<p>Complied</p>																																																	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.4 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, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances.                      - Minor compliance -</p>	<p>Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III &amp; IV chemical used at visited estates. Alternative for class IA chemical, Methamidophos was used named Acephate under class III for bagworm infestation.</p>	<p>Complied</p>
<p>4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).                      - Major compliance -</p>	<p>Pesticides operators have been given training on the safety handling and application of pesticides. The training have been provided by Asst. Manager and suppliers of Spraying Equipment/Pesticides who are knowledgeable on pesticides handling and application. Sighted the training records as follows:</p> <p><u>BCE</u></p> <ul style="list-style-type: none"> <li>i. AJIB fertiliser application training dated 14/5/2018</li> <li>ii. Inter 16 pump maintenance and spraying technique dated 20/4/2018 and 5/1/2018</li> </ul> <p><u>BKE</u></p> <ul style="list-style-type: none"> <li>i. Inter 16 pump maintenance and spraying technique dated 27/7/2018</li> <li>ii. Acephate usage and trunk injection training dated 27/8/2018</li> </ul> <p>Pesticides handler were provided with adequate PPE such as respirator, google, apron, nitrile glove and wellington boot. PPE issuance records are available for review at both estate visited. Interview with store clerk and sprayer, shows the understanding and awareness on importance of PPE.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	<p><u>BCE</u>            All pesticides were store in designated store under lock and key. The balance of remaining pesticides solution were kept at designated area in the store. Sighted during site visit, all the pesticides and the remaining balance were kept in the chemical store.  <b>During site visit at the chemical premixing area, sighted that the premix chemical were not kept under lock and key. The area can be access by any workers and was not secured.</b></p> <p><u>BKE</u>            All pesticides were store in designated store under lock and key. The balance of remaining pesticides solution were kept at designated area in the store. Sighted during site visit, all the pesticides and the remaining balance were kept in the chemical store. Premix chemical was stored at the premix area under lock and key.</p>	Major non conformance
4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.	Complied
4.6.8 Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No pesticides applied aerially.	Complied
4.6.9 Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders at SOU 7. Employees demonstrate knowledge and skills on pesticide handling. MSDS/SDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.1 0	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Proper disposal of waste material are carried out as per the company procedures. The procedures are fully understood by workers and managers. Workers interview reveal that they are aware of the zero burning policy including domestic waste are not allowed to be burned. Management disposes waste material as per regulation for schedule waste and domestic waste.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.1 1</p>	<p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p> <p>The estate conducted medical surveillance on annually basis for all workers involve in chemicals handling. The medical surveillance was conducted by Occupational Health Doctor. Refer Reg. no. HQ/08/DOC/00/329.</p> <p><u>BCE</u> Latest medical surveillance was conducted in December 2018 and January 2019. A total of 76 workers were sent for medical surveillance and found to be free from occupational related toxicity and fit to handle chemicals. The medical surveillance results were communicated to the workers.</p> <p><u>BKE</u> Latest medical surveillance was conducted in August 2018. A total of 11 workers were sent for medical surveillance and found to be free from occupational related toxicity and fit to handle chemicals.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.6.1 2	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	Both estate visited has prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on January 2015  <u>BCE</u> The estate has prohibited the confirmed pregnant or breast-feeding women to work with chemicals through memo signed by the Estate Manager dated 1/1/2019.  <u>BKE</u> The estate has prohibited the confirmed pregnant or breast-feeding women to work with chemicals through memo signed by the Estate Manager dated 1/7/2016.	Complied
<b>Criterion 4.7:</b> An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			

<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.          - Major compliance -</p>	<p>Sime Darby has established Safety and Health Management Policy and Occupational Safety and Health Policy signed by the Managing Director in January 2015. The policy were communicated through training, briefing and displayed on the noticed board.</p> <p><u>BKPOM</u>          The mill has established OSH plan and documented in OSH Management Plan and reviewed on annually basis. The management covered all OSH activities in the mill such as legal and other regulations review, ERP training, HIRARC review, ESH meeting, fire drill, training, medical surveillance and audiometric test. Sighted the implementation of the management plan as follows:          i. Medical surveillance for workers involve with chemicals handling were conducted in May and October 2018. All the 8 workers send for surveillance were found fit to continue work as designated job.          ii. Audiometric test for workers were conducted on 9/2/2018. 2 workers were found with hearing impairment. Both workers were send for retest on 16/6/2018.</p> <p><u>BCE</u>          The estate has established OSH plan and documented in OSH management plan. The plan covered all OSH activity in the estate such as HIRARC review, ESH meeting, fire drill, awareness training, medical surveillance and etc. Sighted the implementation of the OSH plan FY 2018/19 as follows:          i. Noted that the estate has conducted the medical surveillance in December 2018 and January 2019</p> <p><u>BKE</u>          The estate has established OSH plan and documented in OSH management plan. The plan covered all OSH activity in the estate such as HIRARC review, ESH meeting, fire drill, awareness training, medical surveillance and etc. Sighted the implementation of the OSH plan FY 2017/18 and FY 2019 as follows:          i. Medical Surveillance was conducted on August 2018.          ii. HIRARC reviewed were conducted on 7/9/2018.          iii. Sighted the workstation inspection records dated 19/9/2018</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.2 All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.                      - Major compliance -</p>	<p><u>BKPOM</u>                      Issue on health and safety has been assessed and documented in HIRARC report. The assessment was done base on risk assessment criteria. The HIRARC covers all mill main processing and support operation i.e boiler station, fruit handling, steriliser station, threshing station, pressing station, product storage, ETP operation, workshop maintenance, diesel tank, office compound, store and etc. Sighted the latest review were conducted on 3/1/2018.                      For abnormal activities such as construction or fixing new machineries, the appointed contractor have to prepare the HIRARC for the project. Sighted the HIRARC for Construction of 1 unit of 5000 MT CPO Tank dated 2/1/2019.</p> <p><u>BCE</u>                      The estate has conducted assessment to identify any issues on health and safety for all activities in the estate operation and documented in the HIRARC reports. The assessment cover activities office, security, weeding, pest and disease, boundary management, census, pruning, manuring, harvesting and supervision.                      The estate has established HIRARC review team. The HIRARC was reviewed at minimum once a year and when necessary as per accident happen. Latest review was conducted on 12/11/2018 due to accident happen on 5/9/2018 and 24/9/2018.</p> <p><u>BKE</u>                      The estate has conducted assessment to identify any issues on health and safety for all activities in the estate operation and documented in the HIRARC reports. The assessment cover activities office, security, weeding, pest and disease, boundary management, census, pruning, manuring, harvesting and supervision. The HIRARC was reviewed at minimum once a year. Latest review was conducted on 22/1/2019 due to review on harvesting operation due to high accident cases happen.                      For abnormal activities such as construction, the appointed contractor have to prepare the HIRARC for the project. Sighted the HIRARC for Construction of purchased and demolish old wooden house by Bio Technique Engineering.</p>	<p>Complied</p>



<p>4.7.3</p>	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -</p>	<p>All workers involved in operation has been provided with adequate training in safe working practice as per program in the training plan. Sighted the training record as follows: i. EIA, EIE and HIRARC training dated 5/1/2019 ii. Chemical handling and water treatment dated 13/12/2019 iii. Safety for process department briefing dated 23/7/2018 iv. Safety briefing on prohibition on using cell phone during working dated 20/7/2018 v. Operation, maintenance and trouble shooting at purifier station dated 26/4/2018 The employee have been provided with Protective Equipment to cover all potential hazardous operations. Sighted the PPE issuance records for lab operators and boiler operators.</p> <p><b>However, sighted during site visit at the boiler, the workers were not wearing proper PPE when supplying the fibre into the boiler. The condition are not conducive as the workers have to inhale the fibre dust throughout the working hours and can cause occupational health disease.</b></p> <p><u>BCE</u> All workers involved in operation has been provided with adequate training in safe working practice as per program in the training plan. Sighted the training record as follows: i. Townhall Safety briefing dated 8/5/2018 ii. ERP and spillage drill training dated 24/4/2018 iii. SOP for linesite inspection dated 27/2/2018 iv. Inter 16 pump maintenance and spraying technique dated 20/4/2018</p> <p><u>BKE</u> The estate conducted the PPE need analysis and documented in PPE Matrix to determine the PPE needs for each job type. The employee have been provided with Protective Equipment to cover all potential hazardous operations based on need analysis conducted. Sighted the PPE issuance records for rubber boots, apron, nitrile gloves and mask.</p>	<p>Minor non conformance</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>All workers involved in operation has been provided with adequate training in safe working practice as per program in the training plan. Sighted the training record as follows:</p> <ul style="list-style-type: none"> <li>i. EIA, EIE and HIRARC training dated 5/1/2019</li> <li>ii. Fire drill training collaboration with Fire Pro dated 28/12/2018</li> <li>iii. Harvesting SOP training dated 18/12/2018</li> <li>iv Inter 16 pump maintenance and spraying technique dated 27/7/2018</li> <li>v. Kubota handling training dated 5/12/2018</li> </ul>	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p>	<p><u>BKPOM</u>  Sime Darby has appointed the Mill Manager as the OSH responsible person as per letter signed by the Regional General Manager for SOU 7 dated 2/1/2019. The mill management has appointed management and employee representative as ESH committee meeting. The meeting was conducted on quarterly basis as per OSH Management Plan established. Sighted the minutes meeting for OSH committee dated 19/10/2018, 19/7/2018 and 19/4/2018. In the meeting discussed on the OSH achievement, accident and incident report, OSHA compliance, PPE issue, first aid kit monitoring, PPE monitoring, workplace inspection, firefighting equipment monitoring and training.</p> <p><u>BCE</u>  The estate has appointed the Asst. Manager as the OSH Coordinator as per letter signed by the Estate Manager dated 31/12/2019. The management has appointed management and employee representative as ESH committee meeting. The meeting was conducted on quarterly basis as per OSH Management Plan established. Sighted the minutes meeting for OSH committee dated 10/10/2018, 11/7/2018 and 10/4/2018.</p> <p><u>BKE</u>  The estate has appointed the Asst. Manager as the person responsible as per letter signed by the Estate Manager dated 1/1/2018. The management has appointed management and employee representative as ESH committee meeting. The meeting was conducted on quarterly basis as per OSH Management Plan established. Sighted the minutes meeting for OSH committee dated 23/10/2018, 27/7/2018 and 13/4/2018.</p>	<p>Complied</p>

<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p>	<p>Emergency Response Procedure has been established and documented in Mill Quality Management Manual v.1 2008/MQMS/QMM/08 in sub-section 5.5, appendix 5.5.3.3. The emergency procedures has been communicated to the workers through training and briefing. Additionally, the procedure has been displayed on the notice board in local language, Bahasa Malaysia.</p> <p><u>BKPOM</u> The mill has established the emergency response team consist of management and employee from various workstation. The mill conducted firefighting training dated 12/10/2018 to create awareness among the workers to control fire if any incident happen in the mill or housing area. Noted during interview with the employee shows the awareness on using the fire extinguisher to control fire in the mill.</p> <p><u>BCE</u> The estate has conducted training on emergency response preparedness and spillage drill on 9/1/2018 and 24/4/2018. Noted during interview with the employee shows the awareness on using the fire extinguisher to control fire in the estate and housing area. First aider present at various work station at the estate. The first aider responsible for first aid box at each workstation. During interview with the mandore shows the understanding the usage of First Aid Kit.</p> <p><b>Sighted during site visit at the harvesting gang (P09), it was noted that the antiseptic solution don't have any information regarding the expiry date. Sighted during site visit at the workshop and premix area (Bukit Kloh Division), it was noted that the antiseptic solution don't have any information regarding the expiry date and the iodine solution was expired. This shows that the monitoring of the First Aid Box was not effectively implemented.</b></p> <p><u>BKE</u></p>	<p>Minor non conformance</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>The estate has conducted training on emergency response preparedness and spillage drill 28/12/2018. Noted during interview with the employee shows the awareness on using the fire extinguisher to control fire in the estate and housing area.</p> <p>First aider present at various work station at the estate. The first aider responsible for first aid box at each workstation. During interview with the mandore shows the understanding the usage of First Aid Kit.</p>	

<p>4.7.6</p>	<p>All workers shall be provided with medical care, and covered by accident insurance.          - Minor compliance -</p>	<p>Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances.</p> <p><u>BKPOM</u>          Malaysian workers are covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Refer to form 8A, "Jadual Caruman" for December 2018.          Foreign workers are covered by Foreign Workers Compensation Scheme Certificate of Insurance. Sighted the Approval slip for workmen compensation scheme:</p> <table border="1" data-bbox="887 619 1720 852"> <thead> <tr> <th>Insurance</th> <th>Policy</th> <th>Coverage Period</th> </tr> </thead> <tbody> <tr> <td rowspan="3">RHB Insurance Berhad</td> <td>MW 223228</td> <td>17/4/2018 – 16/4/2019</td> </tr> <tr> <td>MW 215023</td> <td>31/3/2018 – 30/3/2019</td> </tr> <tr> <td>MW 256922</td> <td>25/8/2018 – 24/8/2019</td> </tr> </tbody> </table> <p><u>BCE</u>          Malaysian workers are covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Refer to form 8A, "Jadual Caruman" for November and December 2018.          Foreign workers are covered by Foreign Workers Compensation Scheme Certificate of Insurance. Sighted the Approval slip for workmen compensation scheme:</p> <table border="1" data-bbox="887 1046 1720 1214"> <thead> <tr> <th>Insurance</th> <th>Policy</th> <th>Coverage Period</th> </tr> </thead> <tbody> <tr> <td rowspan="2">RHB Insurance Berhad</td> <td>MW 272403</td> <td>24/11/2018 – 23/11/2019</td> </tr> <tr> <td>MW 265015</td> <td>8/10/2018 – 9/11/2019</td> </tr> </tbody> </table> <p><u>BKE</u>          Malaysian workers are covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Refer to form 8A, "Jadual Caruman" for Oktober, November and December 2018.</p>	Insurance	Policy	Coverage Period	RHB Insurance Berhad	MW 223228	17/4/2018 – 16/4/2019	MW 215023	31/3/2018 – 30/3/2019	MW 256922	25/8/2018 – 24/8/2019	Insurance	Policy	Coverage Period	RHB Insurance Berhad	MW 272403	24/11/2018 – 23/11/2019	MW 265015	8/10/2018 – 9/11/2019	<p>Complied</p>
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4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>The estate maintained the records of accident cases as below:</p> <p>Lost Time Accident (LTA) metrics was recoded base on form JKPP 6, 7 and 8. Sampled statistic observed as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="2">BKPOB</th> <th colspan="2">BCE</th> <th colspan="2">BKE</th> </tr> <tr> <th>Cases</th> <th>LTA</th> <th>Cases</th> <th>LTA</th> <th>Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>1</td> <td>18</td> <td>20</td> <td>836</td> <td>23</td> <td>35</td> </tr> <tr> <td>2017</td> <td>1</td> <td>14</td> <td>26</td> <td>205</td> <td>19</td> <td>73</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days (MC)</p>	Year	BKPOB		BCE		BKE		Cases	LTA	Cases	LTA	Cases	LTA	2018	1	18	20	836	23	35	2017	1	14	26	205	19	73	Complied
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<p><b>Criterion 4.8:</b> All staff, workers, smallholders and contract workers are appropriately trained.</p>																														

Criterion / Indicator	Assessment Findings	Compliance
<p>4.8.1 A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.</p> <p>- Major compliance -</p>	<p>The mill has established the training plan for all executives and employee and documented in Training Plan FY 2019. 26 training were identified and programmed throughout the year.</p> <p><u>BCE</u>            The estate has established the training program for the mill executive, workers and contractors base on training need analysis conducted. The training need analysis was documented in Training Requirement for Bukit Cheraka Estate FY 2019. The analysis was based on job designation and type of training needs for the employee. 28 training was identified in the training need analysis and programmed throughout the year.</p> <p><u>BKE</u>            The estate has conducted Training Need Analysis to identify the training to be conducted for FY 2019 and documented in Training Requirement for Bukit Kerayong Estate. The analysis were determined based on job designation and type of training needs for each employee.</p> <p>The estate has established training program based on training need analysis conducted. 33 training was identified in the training need analysis and programmed throughout the year.</p>	<p>Complied</p>



Criterion / Indicator	Assessment Findings	Compliance
4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	<p>All training conducted base on the training plan established. Training was given by Mill/Plantation Executives i.e Asst. Manager, Agronomist or Supplier. Training was conducted centrally for SOU 7 and by individual operating unit. Sighted the training records as follows:</p> <p><u>BKPOM</u></p> <ul style="list-style-type: none"> <li>i. First Aid training dated 12 – 13/12/2018</li> <li>ii. Firefighting training dated 12/10/2018</li> <li>iii. Boiler chemical mixing training dated 13/12/2018</li> <li>iv. Laboratory chemical handling training dated 19/2/2018</li> </ul> <p><u>BCE</u></p> <ul style="list-style-type: none"> <li>i. Townhall Safety briefing dated 8/5/2018</li> <li>ii. ERP and spillage drill training dated 24/4/2018</li> <li>iii. SOP for linesite inspection dated 27/2/2018</li> <li>iv. Inter 16 pump maintenance and spraying technique dated 20/4/2018</li> </ul> <p><u>BKE</u></p> <ul style="list-style-type: none"> <li>i. EIA, EIE and HIRARC training dated 5/1/2019</li> <li>ii. Fire drill training collaboration with Fire Pro dated 28/12/2018</li> <li>iii. Harvesting SOP training dated 18/12/2018</li> <li>iv Inter 16 pump maintenance and spraying technique dated 27/7/2018</li> <li>v. Kubota handling training dated 5/12/2018</li> </ul>	<p>Complied</p>
<p><b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b></p>		
<p><b>Criterion 5.1:</b>            Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>		

Criterion / Indicator	Assessment Findings	Compliance
5.1.1	<p>An environmental impact assessment (EIA) shall be documented.</p> <p>- Major compliance -</p> <p>Plans and impact assessments relating to environmental impacts based on documents as following:</p> <ul style="list-style-type: none"> <li>i) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register.</li> <li>ii) Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI.</li> <li>iii) Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE.</li> </ul> <p>POM and Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts. Sample of new environmental aspect impact reviewed:</p> <ul style="list-style-type: none"> <li>i) Construction of CPO storage tank dated 4/1/19</li> <li>ii) Desludging work dated 4/1/19</li> </ul>	Complied

Criterion / Indicator	Assessment Findings	Compliance															
5.1.2	<p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.</p> <p>- Minor compliance -</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 estates were identified as person-in-charge of the programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were done annually if there's no any new activity within respective sites. Significant environment impact and management plan is documented under Pollution Prevention Plan. Example of management plan checked:</p> <table border="1" data-bbox="927 687 1854 1160"> <thead> <tr> <th data-bbox="927 687 1308 730">Environmental Issue</th> <th data-bbox="1308 687 1854 730">Mitigation Measures</th> </tr> </thead> <tbody> <tr> <td data-bbox="927 730 1308 799">Leakage of lubricant from vehicle</td> <td data-bbox="1308 730 1854 799">To place secondary tray/containment underneath vehicle</td> </tr> <tr> <td data-bbox="927 799 1308 868">Used contaminated hand glove and rags</td> <td data-bbox="1308 799 1854 868">Dedicated container for contaminated hand glove and rags</td> </tr> <tr> <td data-bbox="927 868 1308 970">POME land discharge</td> <td data-bbox="1308 868 1854 970">Make bigger and stronger bund and daily check. 6 monthly maintenance to clear blockages.</td> </tr> <tr> <td data-bbox="927 970 1308 1038">Traces of oil in monsoon drain at workshop area</td> <td data-bbox="1308 970 1854 1038">Construction of oil trap and recover oil weekly.</td> </tr> <tr> <td data-bbox="927 1038 1308 1082">Air emission</td> <td data-bbox="1308 1038 1854 1082">Monitoring CFMS system and stack sampling</td> </tr> <tr> <td data-bbox="927 1082 1308 1160">Leachate from EFB dumping area</td> <td data-bbox="1308 1082 1854 1160">Bund and sump construction, pumping leachate to ETP via sludge pit.</td> </tr> </tbody> </table>	Environmental Issue	Mitigation Measures	Leakage of lubricant from vehicle	To place secondary tray/containment underneath vehicle	Used contaminated hand glove and rags	Dedicated container for contaminated hand glove and rags	POME land discharge	Make bigger and stronger bund and daily check. 6 monthly maintenance to clear blockages.	Traces of oil in monsoon drain at workshop area	Construction of oil trap and recover oil weekly.	Air emission	Monitoring CFMS system and stack sampling	Leachate from EFB dumping area	Bund and sump construction, pumping leachate to ETP via sludge pit.	Complied
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Criterion / Indicator		Assessment Findings	Compliance
5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -	An Environmental Pollution Prevention Plan 2019 made available for POM and estate. Listed environmental issue/Improvement plan/Location /PIC time bound. This environmental improvement plan is implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and reviewed every year (July 2017 - July 2018) to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. The new directive towards DOE's Guided Self-Regulation is being implemented in accordance to the 7 mainstreaming tools.	Complied
<b>Criterion 5.2:</b> The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.			
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	Reassessment of Biodiversity has been conducted in December 2015 by Social & Environment Projects Unit (PSQM). There was an appropriate consultation process for identification, management and monitoring of HCVs. Conservation area is maintained mainly water-log and steep area. At Bukit Cheraka Estate, slope area of 55.52 ha which is more than 25 degree has been maintained as biodiversity area (HCV 4), whereas at Bukit Kerayong Estate, 3.00 Ha of pond was classified as HCV4.	Complied
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	Based on the HCV assessment report, there was no RTE species identified within the plantation nor in the conservation area.	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	Although there is no RTE species identified at SOU7, there is evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities. Signage as well as routine patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity. Continuous communication with workers during morning muster and housing meeting was evident to regularly educate workers on the HCV and biodiversity issue. Latest meeting session was done on 28/12/18.	Complied
5.2.4	Where a management plan has been created there shall be ongoing monitoring: • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	The HCV management plan is developed based on recommendation given by the assessor. The plan includes monitoring of buffer zone area and conservation area in the estate and surrounding area. Monitoring of action plan was carried out at appropriate frequency as a mechanism to ensure effectiveness of implementation. Report of the monitoring was adequately recorded by the person in-charge on weekly basis. Based on the report, no RTE sighted and no evidence of encroachment/trespasses at the identified HCV and conservation area. Refer to December 2018 and January 2019 patrolling and sighting records.	Complied
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	No HCV set asides with existing rights of local communities have been identified	Complied
<b>Criterion 5.3:</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			

Criterion / Indicator	Assessment Findings	Compliance	
5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>As per Sustainable Plantation Management System Appendix 9 Procedure for Handling of Domestic Waste version 1, year 2008, issue no. 1, dated 1 October 2008.</p> <p>Palm oil mill - Type of waste generated:</p> <p>a. Scheduled waste (SW305, SW322, SW409 and SW410) domestic waste and recyclable waste. These categories include: effluent, fibre/shell, EFB, boiler clinker, wash water, scrap metal, scheduled waste, boiler blowdown, hydro-cyclone/claybath wash water, methane gas.</p> <p>Estate - Type of waste</p> <p>a. Scheduled waste – SW102, SW109, SW305, SW306, SW322, SW409, SW410, SW404 – workshop, clinic, SW store, store;</p> <p>b. Domestic waste – rubbish &amp; sewage – line-site, office, workshop, store, shop &amp;</p> <p>c. Recycle waste – empty container, waste oil</p> <p>d. Industrial waste – Scrap iron</p> <p>Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained accordingly</p>	Complied

<p>5.3.2</p>	<p>All chemicals and their containers shall be disposed of responsibly.          - Major compliance -</p>	<p>The disposal of used chemicals and containers were done in accordance with their schedule on waste management as planned. Stores for scheduled waste were inspected at audited sites i.e. Mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Latest disposal records checked:</p> <table border="1" data-bbox="913 587 1865 1364"> <thead> <tr> <th>Operating Unit</th> <th>Contractor</th> <th>Disposal records</th> </tr> </thead> <tbody> <tr> <td>Bukit Kerayong POM</td> <td>Tex Cycle (P2) Sdn Bhd, Jadual Pematuhan, license no. 001486 valid until 30/4/19. Approved waste type : SW 409, SW322 and SW305</td> <td>18/12/18: CN#20181231118GMU9N for SW305 19/12/18: CN#2019010217Y7NIFB for SW322  19/12/18: CN#2019010217NVAFZO for SW409</td> </tr> <tr> <td>Bukit Cheraka Estate</td> <td>Tex Cycle (P2) Sdn Bhd, Jadual Pematuhan, license no. 001486 valid until 30/4/19. Approved waste type : SW 409</td> <td>Consignment notes, Latest disposal, i)14/12/18 – TC18-17414 (SW409) ii)27/8/18 – TC18-11882 (SW409)</td> </tr> <tr> <td>Bukit Kerayong Estate</td> <td>SS Setia Teknologi Enterprise Approval letter, JP KRP 207/12/471 JLD VI dated 7/12/15</td> <td>Disposal records dated 29/12/18, re# 1253 Fertilizer bags – 2.2 mt Chemical container – 2 mt Chemical pump/basta/fusilate /impact – 300 pcs Hydraulic container – 28 pcs</td> </tr> </tbody> </table>	Operating Unit	Contractor	Disposal records	Bukit Kerayong POM	Tex Cycle (P2) Sdn Bhd, Jadual Pematuhan, license no. 001486 valid until 30/4/19. Approved waste type : SW 409, SW322 and SW305	18/12/18: CN#20181231118GMU9N for SW305 19/12/18: CN#2019010217Y7NIFB for SW322  19/12/18: CN#2019010217NVAFZO for SW409	Bukit Cheraka Estate	Tex Cycle (P2) Sdn Bhd, Jadual Pematuhan, license no. 001486 valid until 30/4/19. Approved waste type : SW 409	Consignment notes, Latest disposal, i)14/12/18 – TC18-17414 (SW409) ii)27/8/18 – TC18-11882 (SW409)	Bukit Kerayong Estate	SS Setia Teknologi Enterprise Approval letter, JP KRP 207/12/471 JLD VI dated 7/12/15	Disposal records dated 29/12/18, re# 1253 Fertilizer bags – 2.2 mt Chemical container – 2 mt Chemical pump/basta/fusilate /impact – 300 pcs Hydraulic container – 28 pcs	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		For estates, there are 2 options available for disposal. The empty chemical containers are categorized as non-scheduled wastes after the process of triple rinsing is undergone. The practice was based on the triple rinse procedure and in-line with national programme on recycling of used HDPE pesticide containers. Refer to approval letter issued by DOA, refer to JP KRP 207/12/471 JLD VI dated 7/12/15. Approved DOA contractor, SS Setia appointed to participate in the programme. The containers were mainly disposed through recycling companies (e.g. SS Setia Teknologi Enterprise). Whereas for used oil (SW305), was taken by Sime Darby Industries (SDI) whom was the company hired to carry out machinery & vehicles maintenance job, back to their premise. Refer to approval letter, reference no. AS(BB) 91/110/619/161 Jilid 14 (69) dated 6/9/11.	
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	Action plan to manage the disposal of wastes is documented in the Waste Management Action Plan for 2019. Among the method of disposal are through SW Reg. 2005, landfill, application of industrial waste at the estates (e.g. EFB & POME) and creating awareness among the employees through 3R activities.	Complied
<b>Criterion 5.4:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.			
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of grid supply (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler.</p> <p>The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and coiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis respectively. Average of 36.34 kWh/CPO recorded from January to December 2018.</p>	Complied
<b>Criterion 5.5:</b> Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			



Criterion / Indicator		Assessment Findings	Compliance
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	The Group policy of "Zero open burning" is enforced since July 2008. The operating units adhere to the policy of "Zero open burning" for any replanting, if any, in the estates. Field inspections made in Bukit Cheraka and Bukit Kerayong Estates field showed no evidence of open burning.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	Fire was not used for preparing land for replanting at both visited estates.  <u>Bukit Cheraka Estate</u> Field 2018A, 2018B and 2018C – Stipulated in the contract under Appendix 2, dated 1/7/18 between Sime Darby Plantation Berhad and Keyrul Jaya Enterprise. Only mechanized operation is allowed for the land preparation (felling, shredding, pulverizing and deboling). No phyto-sanitary disposal using fire allowed for pest outbreak.  <u>Bukit Kerayong Estate</u> Field 2018A - Stipulated in the contract under Appendix 2, dated 1/7/18 between Sime Darby Plantation Berhad and YIH Construction Sdn Bhd. Only mechanized operation is allowed for the land preparation (felling, shredding, pulverizing and deboling). No phyto-sanitary disposal using fire allowed for pest outbreak.	Complied
<b>Criterion 5.6:</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

<p>5.6.1</p>	<p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).          - Major compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Aspect Impact for identifying activities that contributes significant impact to environment</p> <p>As prescribed under "Jadual Pematuhan, license# 003124, air emission from boiler stack have to be monitored twice per year. Stack sampling results for 2018 :</p> <table border="1" data-bbox="945 555 1839 1121"> <thead> <tr> <th>Date of monitoring</th> <th>Stack no. 2</th> <th>Stack no. 3</th> </tr> </thead> <tbody> <tr> <td>26/3/18 report reference ALM/SIMEDARBY/ 0218/3824</td> <td>Solid particle (dust) – 35mg/m<sup>3</sup>, dry@ 12%CO<sub>2</sub>. NOx – 6.2 mg/m<sup>3</sup> SO<sub>2</sub> – 3 mg/m<sup>3</sup> CO – 78 mg/m<sup>3</sup> Opacity – not exceeding Ringellman 1</td> <td>Solid particle (dust) – 26mg/m<sup>3</sup>, dry@ 12%CO<sub>2</sub>. NOx - 5.1 mg/m<sup>3</sup> SO<sub>2</sub> – 3.3 mg/m<sup>3</sup> CO – 65 mg/m<sup>3</sup> Opacity – not exceeding Ringellman 1</td> </tr> <tr> <td>21/9/18 report reference ALM/SIMEDARBY/ 0818/4213</td> <td>Solid particle (dust) – 38 mg/m<sup>3</sup>, dry@ 12%CO<sub>2</sub>. NOx – 10 mg/m<sup>3</sup> SO<sub>2</sub> – 8 mg/m<sup>3</sup> CO – 121 mg/m<sup>3</sup> Opacity – not exceeding Ringellman 1</td> <td>Solid particle (dust) – 31mg/m<sup>3</sup>,dry@12%CO<sub>2</sub>. NOx – 7.8 mg/m<sup>3</sup> SO<sub>2</sub> – 5 mg/m<sup>3</sup> CO – 97 mg/m<sup>3</sup> Opacity – not exceeding Ringellman 1</td> </tr> </tbody> </table> <p>The emissions of all parameters tested were complied with their respective limits as stipulated in the EQ (Clean Air) Regulations 1978.</p> <p>Smoke emission was monitored using online system (CEMS-DIS) to DOE based on the transmitted data from boiler smoke density indicator and recorder. Emission result was found in compliance with the regulatory limit.</p>	Date of monitoring	Stack no. 2	Stack no. 3	26/3/18 report reference ALM/SIMEDARBY/ 0218/3824	Solid particle (dust) – 35mg/m <sup>3</sup> , dry@ 12%CO <sub>2</sub> . NOx – 6.2 mg/m <sup>3</sup> SO <sub>2</sub> – 3 mg/m <sup>3</sup> CO – 78 mg/m <sup>3</sup> Opacity – not exceeding Ringellman 1	Solid particle (dust) – 26mg/m <sup>3</sup> , dry@ 12%CO <sub>2</sub> . NOx - 5.1 mg/m <sup>3</sup> SO <sub>2</sub> – 3.3 mg/m <sup>3</sup> CO – 65 mg/m <sup>3</sup> Opacity – not exceeding Ringellman 1	21/9/18 report reference ALM/SIMEDARBY/ 0818/4213	Solid particle (dust) – 38 mg/m <sup>3</sup> , dry@ 12%CO <sub>2</sub> . NOx – 10 mg/m <sup>3</sup> SO <sub>2</sub> – 8 mg/m <sup>3</sup> CO – 121 mg/m <sup>3</sup> Opacity – not exceeding Ringellman 1	Solid particle (dust) – 31mg/m <sup>3</sup> ,dry@12%CO <sub>2</sub> . NOx – 7.8 mg/m <sup>3</sup> SO <sub>2</sub> – 5 mg/m <sup>3</sup> CO – 97 mg/m <sup>3</sup> Opacity – not exceeding Ringellman 1	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		For effluent discharge, regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE. Refer to Indicator 4.4.3 for details.	
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	For the estate, GHG emissions identified including COx, SOx and NOx from various sources including fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area. For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization. 5 years plan for GHG reduction (phase I, 20 mills (Malaysia) was sighted. Programme such as feed in tariff (FIT), flaring, CNG, CaP, Co-gen was included in the plan. The Carbon Emission Reduction Strategy is the overall implementation plan that cuts across SDP's value chain- upstream, downstream and other related business. The group target is to reduce emission by 40% at 2021	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.  Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied. Refer to appendix for details for GHG emission report.	Complied
<b>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</b>			
<b>Criterion 6.1:</b> Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

Criterion / Indicator		Assessment Findings	Compliance
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	<p>The Social &amp; Environment Projects Unit, was conducted for Bukit Kerayong POM, Bukit Kerayong Estate &amp; Bukit Cheraka Estate internally by the PSQM Department. The last SIA was conducted in 2nd – 4th November 2015. Key areas identified in the SIA were on good practices/findings, issues, complaints, suggestions by workers and other stakeholders.</p> <p>The recommendation from the SIA report was transferred to action plan. The action plan identified the issues &amp; strategies, action plan, responsible person and time frame for both positive and negative impact. Seen the Social Management Action Plan 2019 for SOU 7 Bukit Kerayong Oil Mill mentioned 4 issues, for Bukit Cheraka Estate mentioned 5 issues and for Bukit Kerayong Estate mentioned 6 issues.</p>	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	There is Stakeholder’s Meeting conducted on 16 Jan 2019 with the participation of 27 stakeholders such as local communities, local authorities and contractors in Bukit Kerayong POM and Bukit Kerayong Estate. Attendance list of the stakeholders interviewed and minutes of meeting was sighted.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.1.3 Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.</p> <p>- Major compliance -</p>	<p>The mill has developed action plan for Social Assessment where the issues raised during the assessment was recorded in the plan with the specific time frame and person in charge.</p> <p>For example in BKPOM:</p> <ol style="list-style-type: none"> <li>1. There are cases where outsiders comes into the mill linesite and commit crimes such as robbery (status: on-going).</li> <li>2. There are complaint from workers that the drains at linesite are stagnant and the culvert are broken (status: on-going).</li> <li>3. Stray dog coming to the linesite (status: on-going).</li> </ol> <p>Example in Bukit Cheraka Estate:</p> <ol style="list-style-type: none"> <li>1. Drain collapse at Bukit Cheraka Linesite lead to water stagnant especially during rainy season.</li> <li>2. Potholes at linesite Bukit Cheraka.</li> <li>3. Complaints about the disturbance of the stray cattles</li> </ol> <p>Example in Bukit Kerayong Estate:</p> <ol style="list-style-type: none"> <li>1. Request to repair the street lamp along the way to the Hindu Temple.</li> <li>2. Request to control the traffic during the Hindu Temple Ceremony.</li> <li>3. Representative from Taman Sri Kerayong request to clean up the drainage.</li> </ol>	<p>Complied</p>
<p>6.1.4 The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties.</p> <p>- Minor compliance -</p>	<p>The plan was reviewed on yearly basis where the last reviewed was for 2019 in each individual facility. The review was carried out with the participation of affected stakeholders on the completion status.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	There is no smallholder scheme for Bukit Kerayong POM.	Not applicable
<b>Criterion 6.2:</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	The Mill Assistant Manager is responsible, Muhammad Iszat Mohamed Isa (letter dated 01/03/2018) to deal with the stakeholder for social issues. Bukit Kerayong Estate & Bukit Cheraka Estate: The Senior Assistant Manager is responsible to deal with the external communication and social issue as per appointment letter dated 31.12.2018 and 15.10.2018.	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	The latest stakeholders list was updated as at January 2019. Bukit Kerayong POM and supply bases will conduct once a year external stakeholder consultation. The last meeting was conducted on 16 Jan 2019. There was an action plan for the SIA for year 2019 available with the status and action taken.	Complied
<b>Criterion 6.3:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			

Criterion / Indicator		Assessment Findings	Compliance
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	The complaint and grievances is open to all effected parties including internal and external stakeholders. The time to process the complaints or grievances is 2 weeks. For Internal employee, the complaint made during safety meeting and daily briefing. In Bukit Kerayong POM, the complaint will be recorded in Communication and Complaint Logbook by Stakeholder and Workers.  Normally in Bukit Kerayong Estate and Bukit Cheraka Estate, the complaints received for housing repairs work for internal. For external, the complainant can write in directly to Estate and keep the record in the file. In Bukit Cheraka Estate, there is communication file to keep all the request and respond from internal and external. Sampled the request for using hall on 11 June 2018 for graveyard meeting at Bukit Cheraka Estate and water supply, Genset and gate open at 2000A on 12 – 13.05.2018.  The complaint is recorded in Buku Aduan Kerosakan (Bukit Kerayong Estate) and Linesite book (Bukit Cheraka Estate). In case the complainant would want to make an anonymity complaint it can be made through electronic Complaint in whistleblowing e-form.	Complied
<b>Criterion 6.4:</b> 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.			

Criterion / Indicator		Assessment Findings	Compliance
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.  There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP is as per in 6.4.1 above.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land between the neighbouring plantations.	Complied
<b>Criterion 6.5:</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			



Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.1 Documentation of pay and conditions shall be available.                      - Major compliance -</p>	<p>All the workers are under direct employment and some workshops are under contracts workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract. The payroll for the following sampled workers for Aug, Oct and December 2018 were verified to be consistent with the Minimum Wages Order 2016. Minimum wages Order 2019 will be implemented in January 2019 pay slip.</p> <p>Sampled below workers:</p> <ol style="list-style-type: none"> <li>1. BKPO Contract Worker: Mohammed Suruz Sheikh</li> <li>2. BKPO Contract Worker: Md Hafizur Rahman</li> <li>3. BKPO Employee id: 6781</li> <li>4. BKPO Employee id: 97974</li> <li>5. BKPO Employee id: 6790</li> <li>6. BKPO Employee id: 145178</li> <li>7. BKPO Employee id: 132586</li> <li>8. BCE Contract Worker: Saw Kheng Han (Yih Construction)</li> <li>9. BCE Contract Worker: Hamizan Bin Mustapa (Yih Construction)</li> <li>10. BCE Employee id: 134761</li> <li>11. BCE Employee id: 125657</li> <li>12. BCE Employee id: 83006</li> <li>13. BCE Employee id: 129658</li> <li>14. BCE Employee id: 126726</li> <li>15. BKE Employee id: 43744</li> <li>16. BKE Employee id: 29726</li> <li>17. BKE Employee id: 120132</li> <li>18. BKE Employee id: 96889</li> </ol> <p>There was no records or complaint observed during the interview with workers. All the sampled workers for direct employment and contract workers were achieved the minimum wage accordance to Minimum Wage Order 2016 which achieved RM 1000/month</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.                      - Major compliance -</p>	<p>All the workers are under direct employment and some workshops are under contracts workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract.</p> <p>Sighted the employment contract for employee as below:</p> <ol style="list-style-type: none"> <li>1. BKPO Contract Worker: Mohammed Suruz Sheikh</li> <li>2. BKPO Contract Worker: Md Hafizur Rahman</li> <li>3. BKPO Employee id: 6781</li> <li>4. BKPO Employee id: 97974</li> <li>5. BKPO Employee id: 6790</li> <li>6. BKPO Employee id: 145178</li> <li>7. BKPO Employee id: 132586</li> <li>8. BCE Contract Worker: Saw Kheng Han (Yih Construction)</li> <li>9. BCE [Contract Worker: Hamizan Bin Mustapa (Yih Construction)</li> <li>10. BCE Employee id: 134761</li> <li>11. BCE Employee id: 125657</li> <li>12. BCE Employee id: 83006</li> <li>13. BCE Employee id: 129658</li> <li>14. BCE Employee id: 126726</li> <li>15. BKE Employee id: 43744</li> <li>16. BKE Employee id: 29726</li> <li>17. BKE Employee id: 120132</li> <li>18. BKE Employee id: 96889</li> </ol>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –	<p>The basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity and water is connected with the national infrastructure facilities. The usage of electricity and water is free with subsidize rate as per employment contract.</p> <p>During the field assessment, it was observed that the housing are in good conditions. For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2-3 each people per house. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes).</p> <p>Seen the record for weekly linesite inspection done for Bukit Kerayong POM (in charge by Mr Zahariman), Bukit Cheraka Estate (in charge by MA Mohamad Razman Mansor) and Bukit Kerayong Estate (Wan Mohammad bin Wan Hussin) available during the audit.</p> <p>Fogging has been conducted by Sime Darby Agri-Bio on 05-09.11.2018 at worker’s linesite in Bukit Kerayong POM.</p>	Complied
6.5.4 Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food. - Minor compliance –	<p>Mill and estates were located near to town where the workers can be easily access to the town to purchase sundry goods which is Kapar and Jeram Town. Inside the estate also has the sundry shop where the basic goods, crèche and estate clinic are available.</p>	Complied
<p><b>Criterion 6.6:</b>            The employer 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>		

Criterion / Indicator		Assessment Findings	Compliance
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	<p>During the interview with workers, there are no evidence received that there are restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union. It was also confirmed during the stakeholder’s meeting conducted at Bukit Cheraka Estate on 24.01.2019 and Bukit Kerayong Estate on 25.01.2019.</p> <p>The Social Policy established since 2015 covers the commitment of the company towards respecting the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p> <p>The workers union representative for the Bukit Kerayong Estate are Mr Rajan A/L Perumal and Vickneswaran as per letter dated 09.09.2009 while for Bukit Cheraka Estate, the union representative is Mohan Raj (secretary) as per 'Election of NUPW Committee Members' letter dated 26.10.16. In Bukit Kerayong POM, the workers union representative is Kumaran a/l Veramany (chairman), as per letter dated 02.12.11.</p>	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	<p>There is an annual meeting held for employer-employee as sighted in Mesyuarat Wakil Kesatuan Pekerja, KKS Kerayong Bil 4/2018-1 on 14.12.18 attended by 11 workers. The meeting involved workers from various level and discussing the issues related to the employment.</p> <p>For Bukit Cheraka Estate, the meeting was conducted on 20.12.18 as per Minit Mesyuarat Bersama Wakil NUPW Dengan Pihak Pengurusan Ladang Kali Pertama 2018/2019.</p> <p>For Bukit Kerayong Estate, the latest meeting conducted on 24.12.2018 attended by 6 people from management and workers representatives as per Minit Mesyuarat Antara Pihak Ladang dan Wakil NUPW Tahun 2018.</p>	Complied
<p><b>Criterion 6.7:</b> Children are not employed or exploited.</p>			

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

Criterion / Indicator		Assessment Findings	Compliance
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	The Social Policy and Social & Humanity Management Policy was established since January 2015. The Policy covers the commitment to not condone forced labour or child labour. The signatory of the Policy is by Datuk Franki Anthony Dass, the Managing Director of Sime Darby Plantation. Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.	Complied
<b>Criterion 6.8:</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	SDPSB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Migrant workers are recruited with (2 +1) and 3 years contract. Local workers are on a long term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, subsidized water and electric supplier (connect to national water and electricity supply) and medical care (panel clinic) are given to all employees without discrimination. Foreign migrant workers. Refer to Letter of Employment, Employment Contract para" 14 – Annual leave: 14 days for < 5 years and 16 days for > 5 years. Overtime paid as per Employment Act 1995 (EA). Sampled workers are as 6.5.1	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.	Complied
<b>Criterion 6.9:</b> There is no harassment or abuse in the work place, and reproductive rights are protected.			

Criterion / Indicator		Assessment Findings	Compliance
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	The Gender Policy was established since January 2015. The Policy covers the commitment to prevent sexual harassment and all forms of violence against women, workers and community. The signatory of the Policy is by Datuk Franki Anthony Dass, the Managing Director of Sime Darby Plantation. The policy was communicated through the Gender Committee meeting conducted quarterly (combined with all 3 units).	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPSB has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	SDPSB has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meeting was conducted quarterly according to the handbook. A Gender Committee was established by the mill and estates' management. The last meeting was conducted on 09/10/18, 10/7/2018, 06/4/2018 and 09/01/18 for SOU 7 Central East Region (Bukit Cheraka Estate and Bukit Kerayong POM). For Bukit Kerayong Estate, the meeting was conducted on 17.01.2019, 15.11.2018, 11.08.2018, 08.06.2018 and 16.03.2018. The activities such as Raya Celebration, Cake and pastry class, hiking activities etc. sighted. No sexual harassment case been report and confirmed through interviewed with the chairman and female workers.	Complied
<b>Criterion 6.10:</b>			
Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Bukit Kerayong Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	Bukit Kerayong Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders.	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Bukit Kerayong Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders.	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	Bukit Kerayong Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders.	Complied
<b>Criterion 6.11:</b>			
Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	<p>Bukit Kerayong Estate have made contribution to the internal and external stakeholders. For example, the management has contributed and supported the activities such as request donation for Majlis Hari Anugerah Kecemerlangan dan Graduasi Tahun 6 dated 07.08.2018 from SK Bukit Kerayong (RM300) and Majlis Lambaian Kasih, Sanjungan Budi from IPD PDRM Kuala Selangor on 19.10.2018 (RM400).</p> <p>In Bukit Cheraka Estate, the contribution made to SJK(T) Ladang Braunston for assistance in grass cutting service on 16.11.2018, donations for event Lambaian Kasih, Sanjungan Budi, IPD Kuala Selangor for RM 1,000 on 09.11.2018.</p> <p>In Bukit Kerayong Estate, the request has been made for using Padang Ladang Jalan Acob for school sport activities on 08.01.2019 from SJK(T) Ladang Jalan Acob, gate open and water tank for Thaipusam in Kuil Sri Maha Mariamman on 17-21.01.2019.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No scheme smallholder in Bukit Kerayong POM.	Not applicable
<b>Criterion 6.12:</b> No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	The Social Policy and Social & Humanity Management Policy was established since January 2015. The Policy covers the commitment to not condone forced labour or child labour. The signatory of the Policy is by Datuk Franki Anthony Dass, the Managing Director of Sime Darby Plantation.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	<p>Interviewed with the foreign workers confirmed that no contract substitution has occurred. Further cross referencing for worker id: 132586 (BKPOM) between current employment contract and in home country confirmed that there is no contract substitution occurred.</p> <p><b>However, in BKPOM Worker, sighted that 2 contractor’s worker (employee of Lotus Two Enterprise Sdn Bhd) are having the different employer’s name as below:</b></p> <ol style="list-style-type: none"> <li><b>1. Nilchan, passport no: BR0129087 valid until 11.03.2019 (Employer: Junjungan Pelangi Sdn Bhd), employed as cleaner.</b></li> <li><b>2. Rahman Md Hafizur, passport no: BQ0685859 valid until 25 July 2019 (Employer: Hua Hin Furniture Manufacture Sdn Bhd) employed as factory worker.</b></li> </ol> <p>Additionally, in the employment contract, stated that for overtime, it is according to the Bangladesh Labour Laws.</p>	Minor non conformance



Criterion / Indicator		Assessment Findings	Compliance
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	SDPSB has implemented a Sime Darby's Human Rights Charter on 13/1/2017, version 3.0 where they committed as below:  a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. Ensuring favorable working conditions e. Enhancing Safety and Health  They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights on 07.01.19 attended by 49 workers for BKPOM (SDP Policy Training), on 04/12/17 for Bukit Cheraka Estate and on 14.12.18 for Bukit Kerayong Estate. For eg: All the workers have provided with induction training in Sua Betong Estate during their arrival to Malaysia. Seen the training certificates for the workers who has attended the induction training as below:	Complied
<b>Criterion 6.13:</b> Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	SDPSB has established Social and Humanity Management Policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable for Peninsular Malaysia.	Not applicable
<b>Principle 7: Responsible development of new plantings</b>			

Criterion / Indicator	Assessment Findings	Compliance
<b>Bukit Kerayong Palm Oil Mill</b>	Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this surveillance assessment. The immature areas are replanted area.	
<b>Principle 8: Commitment to continual improvement in key areas of activity</b>		
<b>Criterion 8.1:</b> Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.		

Criterion / Indicator	Assessment Findings	Compliance											
<p>8.1.1 The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);               <ul style="list-style-type: none"> <li>• Optimising the yield of the supply base.</li> </ul> </li> </ul> <p>- Major compliance -</p>	<p>Operating unit in SOU 7 has established continual improvement plan based on projects and documented Kaizen Charter. Sighted the sampled implementation of the management plan FY 2018 as follows:</p> <p><u>BKPOM</u> The Mill has established continual improvement plan based on projects and documented Kaizen Charter. Sighted the sampled implementation of the management plan FY 2018 as follows:</p> <ul style="list-style-type: none"> <li>i. To reduce water consumption from SYABAS for mill cleaning. The mill to use water from tube well or using dry cleaning method to reduce water consumption.</li> <li>ii. To install insulation at deparicarping drum at kernel plant.</li> </ul> <p><u>BKE</u> The estate has established continual improvement plan based on projects and documented Kaizen Charter. Sighted the sampled implementation of the management plan FY 2018 as follows:</p> <ul style="list-style-type: none"> <li>i. To reduce cost of disposal of empty chemical containers by handling it as recycle waste. All empty containers were triple rinse and punctured before sold to the approved disposal contractor.</li> <li>ii. To boost safety awareness on workers level. The estate has conducted continuous training and briefing to the workers. Results of the accident cases FY 2017 vs 2018:</li> </ul> <table border="1" data-bbox="1200 1107 1583 1238"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="2">BKE</th> </tr> <tr> <th>Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>23</td> <td>35</td> </tr> <tr> <td>2017</td> <td>19</td> <td>73</td> </tr> </tbody> </table>	Year	BKE		Cases	LTA	2018	23	35	2017	19	73	<p>Complied</p>
Year	BKE												
	Cases	LTA											
2018	23	35											
2017	19	73											

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

**Appendix B: Approved Time Bound Plan**

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11-Aug-20	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	Mill was closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543594	N.A
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Mill was closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020, MUTU – RSPO/091	N.A
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019, MUTU-RSPO/094	N.A
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288,	N.A

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

					824 502 16049, MUTU- RSPO/092	
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-855480	N.A
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	RSPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-19	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU-RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051, MUTU-RSPO/093	N.A
17	Kempas	Jasin, Melaka	19 May '10	18-May-20	RSPO 005	N.A
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	N.A
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-19	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	Mill was closed down.
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	N.A
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	N.A
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	N.A
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042, BV-	N.A

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

					RSPO-20170705-01	
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BV-RSPO-20170623-01	N.A
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	RSPO 547123	Mill was closed down.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-18	RSPO 537872	N.A
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	N.A
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	N.A
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Mill was closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Mill was closed down.
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	N.A
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	N.A
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	N.A
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	N.A

Legends

Certification  
 Withdrawal

NA - NOT APPLICABLE

Note: There are 2 certificate numbers for some SOUs due to transfer of CB.

## RSPO Public Summary Report

### Revision 7 (Aug /2018)

#### SDP- RSPO Certification Status for Indonesia Operations

No	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	SGS-RSPO/PC17-00005	N.A
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	3-Jul-18	MUTU-RSPO/027	N.A
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	N.A
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamakan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	N.A
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	N.A
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	N.A
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	N.A
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamakan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	N.A
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	N.A
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	N.A
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	30-Dec-16	MUTU-RSPO/009	N.A
13		BETUNG		1-April-14	1-April-19	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU-RSPO/001	N.A
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	15-Mar-17	MUTU-RSPO/015	Cert. discontinued – supply bases extended to Rantau POM
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU-RSPO/020	N.A

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	N.A
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Iilir, Riau	01-Dec-16	30-Nov-21	MUTU-RSPO/008	N.A
19		MANDAH		1 April 2014	1 April 2019	MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	N.A
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	N.A
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	N.A
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	3-May-18	MUTU-RSPO/026	N.A
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-19	MUTU-RSPO/044	N.A
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	N.A

Legends

Pending Certification by RSPO EB	Mill down	closed
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NA - NOT APPLICABLE



**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2018** for Bukit Kerayong 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 **2018** for Bukit Kerayong POM and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.02
PK	1.02

Extraction	%
OER	19.55
KER	4.95

Production	t/yr
FFB Process	122,385.45
CPO Produced	23,967.74
PK Produced	6,072.50

Land Use	Ha
OP Planted Area	15131.31
OP Planted on peat	459.2709
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>15590.5809</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	53,256.48	0.43	85.58	0.42	0	0	53,342.1	0.85
CO <sub>2</sub> Emission from fertilizer	6,152.04	0.05	7.31	0.04	0	0	6,159.4	0.09
NO <sub>2</sub> Emmision	5,354.95	0.04	11.91	0.05	0	0	5,366.9	0.09
Fuel Consumption	790.79	0.01	1.1	0.01	0	0	790.8	0.02
Peat Oxidation	0	0	43.03	0.13	0	0	43.03	0.13
<b>Sink</b>								
Crop Sequestration	-50,480.08	-9.26	-80.17	-0.4	0	0	50,560.30	9.7
Conservation Sequestration	0	0	0	0	0	0	0	0

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

<b>Total</b>	<b>15,074.18</b>	<b>2.73</b>	<b>68.76</b>	<b>0.24</b>	<b>0</b>	<b>0</b>	15,142.9	69
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\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2e</sub>	tCO <sub>2e</sub> /tFFB
<b>Emission</b>		
POME	14511.09	0.12
Fuel Consumption	111.84	0
Grid Electricity Utilisation	745.37	0.01
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>15368.3</b>	<b>0.13</b>

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

<b>Emissions</b>	<b>tCO<sub>2e</sub></b>
PK from own mill	6,167.71
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

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

**Appendix D: General Chain of Custody Requirements for the Supply Chain**

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Sime Darby Plantation headquarter has the physically handle the RSPO Certified Sustainable oil palm products. All trading, contract and sales are managed by Global Trade Marketing department at Sime Darby Plantation, HQ and held the palmTrace registration number for respective mill (Bukit Kerayong Palm Oil Mill: RSPO_PO1000000155	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Bukit Kerayong POM is not a trading company. Therefore, this requirement is not applicable.	N/A
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Sime darby Plantation Bhd held RSPO membership number: 2 10008-04-000-00 since 06 September 2004. Company has registered in palmTrace system as follows: Members ID – Bukit Kerayong Palm Oil Mill: RSPO_PO1000000155. Licensee valid until 14/04/2019 Member category : Oil Mill	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Processing aids are not used in the milling process.	N/A
<b>5.2 Supply chain model</b>			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	The FFB suppliers are of RSPO certified estates which consists of Bukit Kerayong POM certification unit and other Sime Darby	Yes

		group estates Declassification of the CPO or PK was done in accordance to the correct order.	
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Bukit Kerayong POM only produced IP certified palm product and the sales of product were IP or conventional.	Yes
<b>5.3. Documented Procedures</b>			
5.3.1	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	<p>Procedure for supply chain has been established entitled "Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability" [appendix 15 of the Sustainable Plantation Management System (SPMS)], version 4, dated September 2018.</p> <p>Among the subjects covered in the procedure are</p> <ul style="list-style-type: none"> <li>• Responsibilities</li> <li>• control of documents &amp; records</li> <li>• delivery of FFB from the estate</li> <li>• receiving FFB at the mill</li> <li>• process monitoring</li> <li>• CPO and PK dispatch</li> <li>• Non-conforming products and/or documents</li> <li>• Product claims</li> <li>• Outsourced contractor</li> <li>• Training</li> <li>• Reclassification of mill's supply chain model</li> <li>• Production volume</li> <li>• Conversion factors</li> <li>• Internal audit</li> <li>• Complaints</li> <li>• Management review</li> </ul>	Yes
	<ul style="list-style-type: none"> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	<p>Among the records included in the procedures are:</p> <ul style="list-style-type: none"> <li>• Weighbridge tickets</li> </ul>	Yes

		<ul style="list-style-type: none"> <li>Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document</li> <li>Daily production report</li> <li>Record and balance</li> <li>All the records were found to be up-to-date.</li> </ul>	
	<ul style="list-style-type: none"> <li>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 organization’s procedures for the implementation of this standard.</li> </ul>	Addressed in the SOP for Sustainable Supply Chain and Traceability, clause 4.0. The assigned persons are the Head of Operating Unit where in this case the Mill Manager. Based on interview, the person in-charge was able to demonstrate the implementation of their procedures in accordance to the standard requirements.	Yes
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	Addressed in the SOP for Sustainable Supply Chain and Traceability, clause 17.0. Based on the procedure, the internal audit is to be conducted annually in accordance to Internal Audit Procedure (SD/SDP/PSQM/IAP).	Yes
	ii) effectively implements and maintains the standard requirements within its organization	Combined internal audit for supply chain was last conducted on 17-20/12/2018 by 6 internal auditor sourced from other department (PSQM). There were 4 major raised (RSPO SCC) as the results of the audit.	Yes
<b>5.4. Purchasing and goods in</b>			
5.4.1	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form: <ul style="list-style-type: none"> <li>The name and address of the buyer;</li> <li>The name and address of the seller;</li> <li>The loading or shipment/delivery date;</li> <li>The date on which the documents were issued;</li> </ul>	<p>Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p> <p>Bukit Kerayong mill have system to verify at the weighbridge. Sampled as following:</p> <p><b>Bukit Cheraka Estate</b></p>	Yes

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

	<ul style="list-style-type: none"> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>Code : E-167, Consignment note# 039361, Field no: 05, Div. Bukit Panjong  Tonnage: 10.27 mt  Bukit Kerayong POM RSPO Cert # 550181</p> <p><b>Bukit Kerayong Estate</b>  Code : E-165, Consignment note# 020600, Field no: 14C, Div. Main  Tonnage: 10.38 mt  • Bukit Kerayong POM RSPO Cert # 550181</p>	
	<ul style="list-style-type: none"> <li>• 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).</li> </ul>	<p>Bukit Kerayong mill have system to verify at the weighbridge. Sampled as following:</p> <p><b>Bukit Cheraka Estate</b>  Code : E-167, Consignment note# 039361, Field no: 05, Div. Bukit Panjong  Tonnage: 10.27 mt  Bukit Kerayong POM RSPO Cert # 550181</p> <p><b>Bukit Kerayong Estate</b>  Code : E-165, Consignment note# 020600, Field no: 14C, Div. Main  Tonnage: 10.38 mt  Bukit Kerayong POM RSPO Cert # 550181</p>	<p>Yes</p>
	<ul style="list-style-type: none"> <li>• The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	<p>The supplier for Bukit Kerayong POM are from own estates and crop diversion from other Sime Darby ie: Estate Bukit Talang, Estate Sg Buloh and Estate Tennamaram as per SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4. These estate didn't need the making the shipping announcement.</p>	<p>Yes</p>

	<ul style="list-style-type: none"> <li>A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	Bukit Kerayong POM only receive the FFB from own estate, therefore this requirement is not applicable.	Yes
	<ul style="list-style-type: none"> <li>The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements.</li> </ul>	Bukit Kerayong POM only receive the FFB from own estate, therefore this requirement is not applicable.	Yes
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	<p>There is procedure for handling non-conforming products and/or documents as per SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4.</p> <p>Where there is contamination of RSPO/MSPO certified material during receiving, processing, storage and dispatch, the mill/estate shall downgrade the materials following the downgrade order: RSPO: IP -&gt; MB -&gt; Non certified</p>	Yes
<b>5.5. Outsourcing activities</b>			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	The list of outsourced contractor was sighted, "list of stakeholder as at January 2019" include the transport contractor for CPO and PK. eg: Jasa Korporat Sdn Bhd/ The China Engineers (Malaysia) Sdn Bhd and STB Maju (M) Sdn Bhd.	Yes

5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:	There is Annexure 5, RSPO Supply Chain Certification Standard for contractor’s agreement mentioned the site has legal ownership of all input material to be included in outsourced processes.	N/A
	a. The site has legal ownership of all input material to be included in outsourced processes;		
	b. The site 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 site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.	Agreement on the transportation of CPO for The China Engineers (Malaysia) Sdn Bhd’s Peninsular Malaysia Oil Mills dated 19 December 2017 with validity of 3 years contract with an option to extend for 1 year, or a contract for any duration at company’s discretion.	N/A
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	The mill ensure that outsourced activities (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced processes within Bukit Kerayong Palm Oil Mill, hence this requirement is not applicable.	N/A
d. The site seeking or holding certification 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 any and all information, when this is announced in advance.	The mill ensure that outsourced activities (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced processes within Bukit Kerayong Palm Oil Mill, hence this requirement is not applicable.	N/A	
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	The mill ensure that outsourced activities (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced processes within Bukit Kerayong Palm Oil Mill, hence this requirement is not applicable.	N/A
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	So far, no new contractor used for the processing or physical handling of RSPO certified oil palm products. The contractor used only for CPO transportation.	N/A
<b>5.6. Sales and goods out</b>			



<p>5.6.1</p>	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>Bukit Kerayong Palm Oil Mill has established SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4.</p> <p>Sample the sales contract and invoices as below:</p> <p><u>CSPO</u> Despatch Ticket: 011009 Buyer: SDP Joma Ref – Sime Darby Plantation Sdn Bhd Address: Teluk Panglima Garang Industrial EAS Contract No: S/C-PSD/1812/CPO0736H Shipment date: 1/18/2019 Quantity: 35,210 KG Product: CPO RSPO IP Transport: Jasa Korporat Sdn Bhd Supply chain cert no: RSPO550181</p> <p><u>CSPK</u> Despatch Ticket: 011021 Buyer: SDP KCP – Sime Darby Plantation Berhad Address: KCP-Pulau Carey Contract No: S/C-PSD/1901/PK0003 Shipment date: 1/19/2019 Quantity: 28,700 KG Product: Palm Kernel RSPO IP Transport: STB Maju – STB Maju (M) Sdn Bhd Supply chain cert no: RSPO550181</p>	<p>Yes</p>
	<ul style="list-style-type: none"> <li>• 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).</li> </ul>	<p>The information been verified in the despatch note, SOP and shipping announcement.</p>	<p>Yes</p>

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

	<ul style="list-style-type: none"> <li>For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	<p>Sampled the shipping announcement as below:            Buyer: Sime Darby KCP Carey Island            Transaction ID: TR-9eef64a7-1c3e            Quantity: 600 MT            Product: CSPK (IP)            Shipping/BL Date: 03/11/2018</p>	Yes
<b>5.7. Registration of transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries and;</li> <li>take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	<p>The registration of PalmTrace will be carried out by the Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Company has registered their mill in the PalmTrace with Members ID – Bukit Kerayong Oil Mill:RSPO_PO1000000155,             License valid until 14/04/2019            Member category : Oil Mill</p>	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> </ul>	<p>Bukit Kerayong Palm Oil Mill has the Procedure for Handling of Certified CPO and PK despatch where it was mentioned that Global Trade Marketing shall make the necessary transaction of RSPO certified CPO and PK in the RSPO IT Platform.             Sampled the shipping announcement 5.6.1</p>	Yes
	<ul style="list-style-type: none"> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> </ul>	<p>Every shipping announcement made by Global Trade Marketing, HQ in RSPO IT platform per shipment or group of shipments or the book and claim system (RSPO credits). The declaration time to do shipping announcement is at least within 3 month period after the shipment or within the duration agreed by Mill's respective customers/buyers.</p>	N/A

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

	<ul style="list-style-type: none"> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	There were no volume sold for other scheme (refer to Table 11 & 12; Supply Chain declaration of Table D & E; Summary Template).	Yes
	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	Sampled of shipping announcement documents and found that the management done the shipping announcement accordingly.	Yes
<b>5.8. Training</b>			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training plan for 2018/2019 were available which training for RSPO Supply Chain has been included. Training need analysis is done prior to development of training plan.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	<p>Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor &amp; assistant, weighbridge operators. At Bukit Kerayong POM case, 4 personnel were identified.</p> <p>The latest RSPO training was carried out on 15/12/2018 attended by other operating units representative. The refresher training was given by PSQM personnel from HQ.</p>	Yes
<b>5.9. Record Keeping</b>			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained minimum of two years.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil	Not applicable. The product of the facility is containing 100% palm oil.	N/A

	palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.		
<b>5.10. Conversion factors</b>			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleochemicals and its derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year's average from January to December 2018 were 20.98% (OER) & 5.26% (KER).	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
<b>5.11. Claims</b>			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	No claims were made regarding the use of or support of or support of RSPO certified oil palm products.	N/A
<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Bukit Kerayong POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	N/A
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address ( <a href="http://www.rspo.org">www.rspo.org</a> ) c. State that the member supports the work of the RSPO	Not applicable as no off-product claim made by Bukit Kerayong POM as to date.	N/A

	<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. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at <a href="http://www.rspo.org">www.rspo.org</a>’ 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 Bukit Kerayong POM as to date.	N/A
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Not applicable as no off-product claim made by Bukit Kerayong POM as to date.	N/A
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Bukit Kerayong POM and verified through document and site review (notice board, business card, shipping documentation, procurement/purchasing document and promotional material etc).	N/A
<b>Business to business communications</b>			
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.	N/A
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 (Palm Kernel RSPO IP) and RSPO certificate number; RSPO 550181. Refer to weighbridge ticket number 011021 dated 19/1/19. This also applies to CPO.	N/A

5.3	<p>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:</p> <ol style="list-style-type: none"> <li>If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</li> <li>If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</li> </ol>	<p>Bukit Kerayong POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.</p>	N/A
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>Bukit Kerayong POM is producing crude palm product and does not involved in any labelling of end product and the presence of certified palm oil contained within a product. This requirement is for the next supply chain actor and not applicable for POM.</p>	N/A
<b>Business to consumer communication</b>			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.</p>	N/A

6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A

	<p>ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rsपो.org">www.rsपो.org</a>.</p>		
<p><b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b></p>			
<p><b>Certified oil palm content (IP)</b></p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>Oil palm content is 100% CPO and claim as RSPO IP-certified.</p>	<p>Yes</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>No SG claim made.</p>	<p>N/A</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.</p>	<p>N/A</p>
<p><b>Labelling and trademark (IP)</b></p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:  a. RSPO trademark which includes the tag 'CERTIFIED' or  b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch).</p>	<p>As to date, no RSPO trademark used by Bukit Kerayong POM.</p>	<p>N/A</p>



	In on-pack communications, the RSPO trademark can be printed anywhere on the pack.		
<b>Messaging (IP)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>	As to date, no RSPO trademark used by Bukit Kerayong POM.	N/A
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Minimum Mass Balance content (MB)</b>			
	95% or above of the oil palm content must be RSPO MB-certified.	Bukit Kerayong POM is producing RSPO IP product and no MB claim made as to date.	N/A
	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	Bukit Kerayong POM is producing RSPO IP product and no MB claim made as to date.	N/A

	requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.		
<b>Labelling and trademark (MB)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• 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).</li> <li>• 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 &amp; Claims document.</li> </ul>	Bukit Kerayong POM is producing RSPO IP product and no MB claim made as to date.	N/A
<b>Messaging (MB)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>• [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.</li> </ul>	Bukit Kerayong POM is producing RSPO IP product and no MB claim made as to date.	N/A

	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>		
	<p>Messaging NOT ALLOWED in storytelling in product-related communications: Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	<p>Bukit Kerayong POM is producing RSPO IP product and no MB claim made as to date.</p>	<p>N/A</p>
<b>MODULE C – PARTIAL PRODUCT CLAIMS</b>			
	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> <li>• The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO.</li> <li>• At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB.</li> <li>• The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume.</li> <li>• The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'.</li> <li>• The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim.</li> </ul>	<p>Bukit Kerayong POM is producing RSPO IP product and no MB claim made as to date.</p>	<p>N/A</p>
<b>MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES</b>			

	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG =&gt; 95% SG claim is made          65% SG + 30% MB =&gt; 95% MB claim is made          55% MB + 40% B&amp;C =&gt; 95% partial product claim can be made          45% SG + 55% B&amp;C &lt; 50% B&amp;C claim can be made</p>	<p>Bukit Kerayong POM is producing only RSPO IP product and no possibility of mixture inputs supplied. All infeed material (FFB) coming from RSPO certified estates.</p>	N/A
	<p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB =&gt; 95% IP IP claim can be made          95% SG + 5% MB =&gt; 95% SG SG claim can be made          95% MB + 5% C =&gt; 95% MB MB claim can be made</p>	<p>Bukit Kerayong POM is producing only RSPO IP product and no possibility of mixture inputs supplied. All infeed material (FFB) coming from RSPO certified estates.</p>	N/A
<b>5.12. Complaints</b>			
5.12.1	<p>The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.</p>	<p>Addressed in Section 18 of the supply chain SOP. Should there be any complaints from stakeholders pertaining supply chain issues, it will be handled through Procedure for External Communication in PQMS SOM Sub-Section 5.5 Appendix 5.5.3.2. There has been no complaint from any third party with regards to supply chain so far.</p>	Yes
<b>5.13. Management Review</b>			
5.13.1	<p>The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.</p>	<p>Combined RSPO/MSPO management review was last conducted on 20/12/2018. It was chaired by Mill Manager and attended by other estates manager, mill staff which include AMs, Head of AP, office clerk, lab supervisor, quality supervisor and mill supervisor.</p>	Yes

5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	<p>Based on the minutes of meeting, the following agendas were adequately recorded:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard. (item 1.8)</li> <li>• Customer feedback. (item 1.0.1)</li> <li>• Status of preventive and corrective actions. (item 1.8)</li> <li>• Follow-up actions from management reviews. (item 1.0.2)</li> <li>• Changes that could affect the management system. (item 3.0)</li> <li>• Recommendations for improvement. (item 4.0)</li> </ul>	Yes
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>	<p>Discussion about the improvement of the effectiveness of the management system and its processes, and any resource needs were found to be included in the meeting minute.</p>	Yes

**Appendix E : CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: Identity Preserved )**

<b>D.1 Definition</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
D.1.1	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ 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 Module E is applicable.	Bukit Kerayong mill received only certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Yes
<b>D.2 Explanation</b>			
D.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit 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.	Yes

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

D.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).  Members ID – Bukit Kerayong Oil Mill:RSPO_PO1000000155, Licence valid until 14/04/2019 Member category : Oil Mill	Yes
<b>D.3 Documented procedures</b>			
D.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:  a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	Bukit Kerayong Palm Oil Mill has established SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4 which covered control of documents and records, delivery of FFB from the estate, receiving FFB at the mill, process monitoring, CPO and PK despatch, non-conforming material/product, outsourced contractor, training, reclassification of mill’s supply chain model and production volume.	Yes
	b. 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 site’s procedures for the implementation of this standard.	The assistant manager has the responsibility to assist any Environmental/Quality related internal/external certification including SCCS as per appointment letter dated 12.09.2017. The IP model is used because only certified FFB from own supply base is received and processed at Bukit Kerayong Palm Oil Mill.	Yes
D.3.2	The site shall have documented procedures for receiving and processing certified FFBs.	Bukit Kerayong Palm Oil Mill has established SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4 which covered control of documents and records, delivery of FFB from the estate, receiving FFB at the mill, process monitoring, CPO and PK despatch, non-conforming material/product, outsourced contractor, training, reclassification of mill’s supply chain model and production volume.	Yes
<b>D.4 Purchasing and goods in</b>			

D.4.1	The site shall verify and document the tonnage and sources of certified FFBS received.	<p>Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p> <p>Bukit Kerayong mill have system to verify at the weighbridge. Sighted other certified FFB under the same group sampled as following:</p> <p><b>Bukit Cheraka Estate</b>  Code : E-167, Consignment note# 039361, Field no: 05, Div. Bukit Panjong  Tonnage: 10.27 mt  Bukit Kerayong POM RSPO Cert # 550181</p> <p><b>Bukit Kerayong Estate</b>  Code : E-165, Consignment note# 020600, Field no: 14C, Div. Main  Tonnage: 10.38 mt  Bukit Kerayong POM RSPO Cert # 550181</p>	Yes
D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	There is no overproduction of certified tonnage based on the accounting system.	Yes
<b>D.5 Record keeping</b>			
D.5.1	<p>The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p><i>IP Mill must report on real time basis.</i></p>	<p>All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place. No PKO and Palm kernel meal at Bukit Kerayong Palm Oil mill. PK is sold to Sime Darby's Kernel Crushing Plant and also other 3 party KCP. Daily records are prepared at the entry point at the weighbridge.</p> <p>Daily summary and monthly summary documented for all the FFB received. Records of certified FFB received verified during P&amp;C annual surveillance audit. Records verified by internal and external audit.</p> <p>Based on contract, sampled:</p>	Yes



**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

		<p><u>CSPO</u>  Despatch Ticket: 011009  Buyer: SDP Joma Ref – Sime Darby Plantation Sdn Bhd  Address: Teluk Panglima Garang Industrial EAS  Contract No: S/C-PSD/1812/CPO0736H  Shipment date: 1/18/2019  Quantity: 35,210 KG  Product: CPO RSPO IP  Transport: Jasa Korporat Sdn Bhd  Supply chain cert no: RSPO550181</p> <p><u>CSPK</u>  Despatch Ticket: 011021  Buyer: SDP KCP – Sime Darby Plantation Berhad  Address: KCP-Pulau Carey  Contract No: S/C-PSD/1901/PK0003  Shipment date: 1/19/2019  Quantity: 28,700 KG  Product: Palm Kernel RSPO IP  Transport: STB Maju – STB Maju (M) Sdn Bhd  Supply chain cert no: RSPO550181</p>	
<b>D.6 Processing</b>			
D.6.1	The site 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 product including during transport and storage to strive for 100% separation.	During this assessment it was confirmed that only certified source of FFB from own plantation is processed. This ensures that there is no possibility of mixing during processing. There is a possibility that the mill will receive Certified FFB from other Sime Darby’s Certified Estate (crop diversion) as per the RSPO Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4. No noncertified FFB received.	Yes

**Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>Period: Oct 17 – Sep 18</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	January 2018	8502.08	0	8502.08
2	February 2018	8777.33	0	8777.33
3	March 2018	10976.89	0	10976.89
4	April 2018	11037.07	0	11037.07
5	May 2018	10926.71	0	10926.71
6	Jun 2018	11092.36	0	11092.36
7	July 2018	10605.31	0	10605.31
8	Aug 2018	10440.61	0	10440.61
9	September 2018	12321.26	0	12321.26
10	October 2018	8123.15	0	8123.15
11	November 2018	10761.61	0	10761.61
12	December 2018	8848.25	0	8848.25
<b>TOTAL</b>		<b>122,412.63</b>	<b>0</b>	<b>122,412.63</b>

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit (Jan 18 – Dec 18)</b>			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	January 2018	1752.33	481.059
2	February 2018	1927.80	459.055
3	March 2018	2373.92	605.678
4	April 2018	2386.626	602.042
5	May 2018	2312.46	561.259
6	Jun 2018	2271.711	567.955
7	July 2018	2251.974	546.154
8	Aug 2018	2250.494	575.977
9	September 2018	2555.397	700.230
10	October 2018	1619.636	391.665
11	November 2018	2249.573	541.543
12	December 2018	1730.042	406.610
Total		25,681.96	6,439.23

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any) Period: (Jan 18 – Dec 18)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	ABC Kernel	TR-9eef64a7-1c3e, TR-b454c769-f709, TR-ad046bcc-6236, TR-acfc4083-9ff2, TR-c0461b35-81e8, TR-7d620850-d8a2, TR-0423934d-2f8b, TR-ae758a9a-5983, TR-4fb6c143-fbb7, TR-f50eaad2-6a80, TR-bbe98e8c-b6b1, TR-a86eff90-a623, TR-625e6906-7f1b, TR-03ee3a53-5594,	-	5,433.54
2	ABC Refinery	TR-49085835-09a3, TR-2c948fd0-7529, TR-79f9b540-e2aa, TR-a3e09c05-07c2, TR-e59c907b-6a22, TR-9e735c9e-d277, TR-4a97dab2-2ebc, TR-b15f7680-7dc9, TR-6544fc82-4f8f, TR-a3b64731-64f3, TR-2700ff49-4505, TR-18943108-9a18, TR-aba93025-1233, TR-cbff084f-79d9, TR-e0e77245-bcda, TR-2dd6df09-9bbe, TR-3edea9de-9c65, TR-482133c2-b8be, TR-62c01ebe-ed9b, TR-63349101-1e64, TR-4bd96f27-05cd, TR-4860bae6-1d3d, TR-3e70e298-93ff, TR-85d6a6bc-c7c5, TR-81302133-5762, TR-bd2c2bda-6f9b, TR-b5a80386-6996, TR-1d29f616-be48,	21,711.81	-

**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

		TR-8de98b3d-4d45, TR-dbc4c281-b464, TR-aa0cc490-6f94, TR-7dd9ebad-14fb, TR-24260b5e-1490, TR-434b6a2a-52a1, TR-f3307605-3c97, TR-6ef2d748-d2bd, TR-627f2f9b-5866, TR-11e283b3-7263, TR-c039eb6b-1e22, TR-424d9ddd-c59e, TR-84be7921-f367, TR-3a11deab-b74d		
3	DEF Refinery	TR-909c75cb-a136, TR-a3884b1d-d2d0, TR-25445e4c-150e, TR-688783d5-e15b, TR-792be8a7-64df, TR-7d96268f-1080	1,500.00	-
TOTAL			23,211.81	5,433.54

**D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)**

Period: (*Jan 18 – Dec 18*)

No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
N/A				

**E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)**

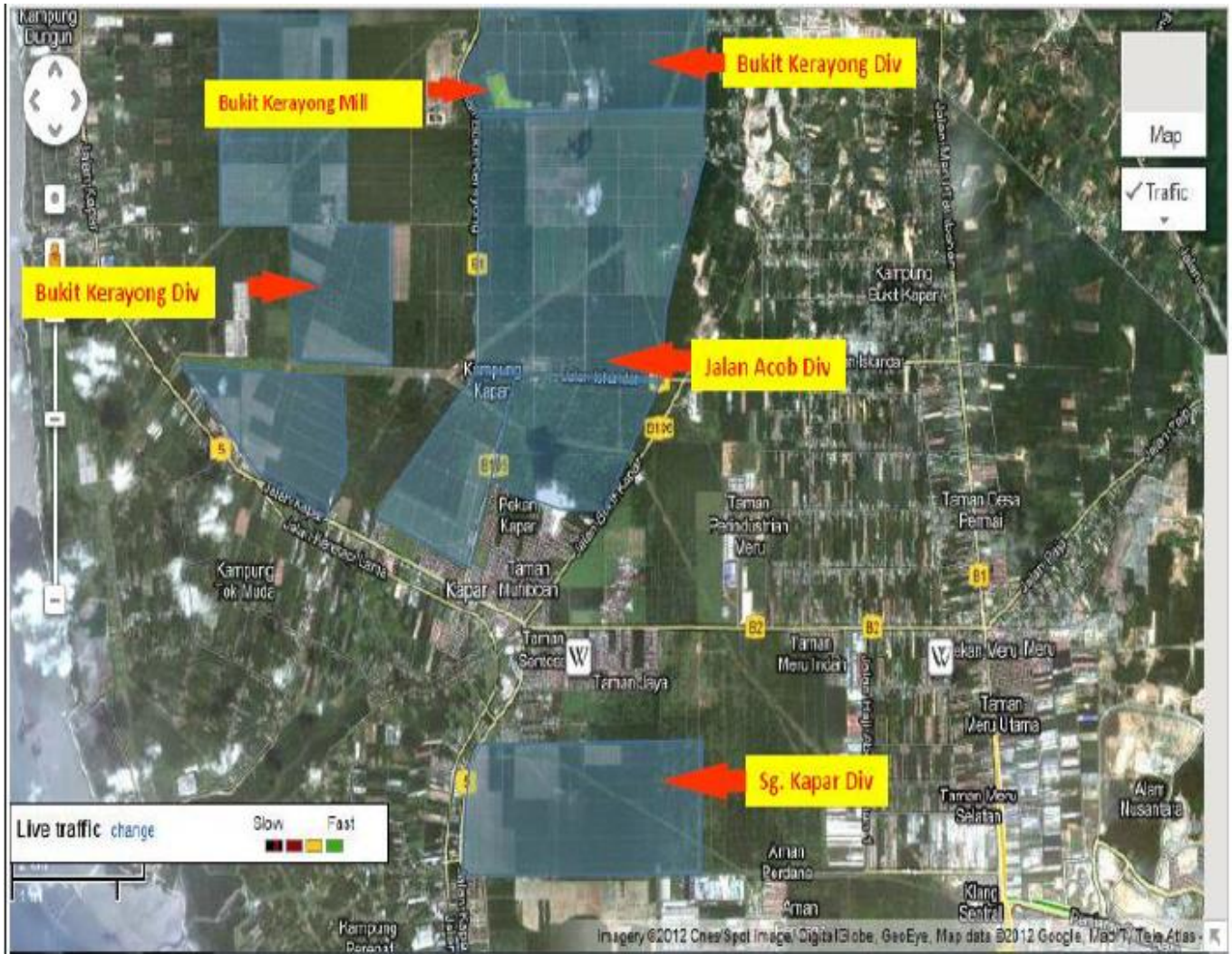
Period: (*Jan 18 – Dec 18*)

No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Nuri Refinery	1,499.33	-
2	Mewah Oil Sdn Bhd	423.75	-
3	NCH O&F Semenyih	249.30	-
4	Bmd (Simit)	215.25	-
5	Hup Lee	-	709.95
6	Sin Huat Hin	-	129.56
7	Sang Kee	-	70.44
Total		2,387.63	909.95

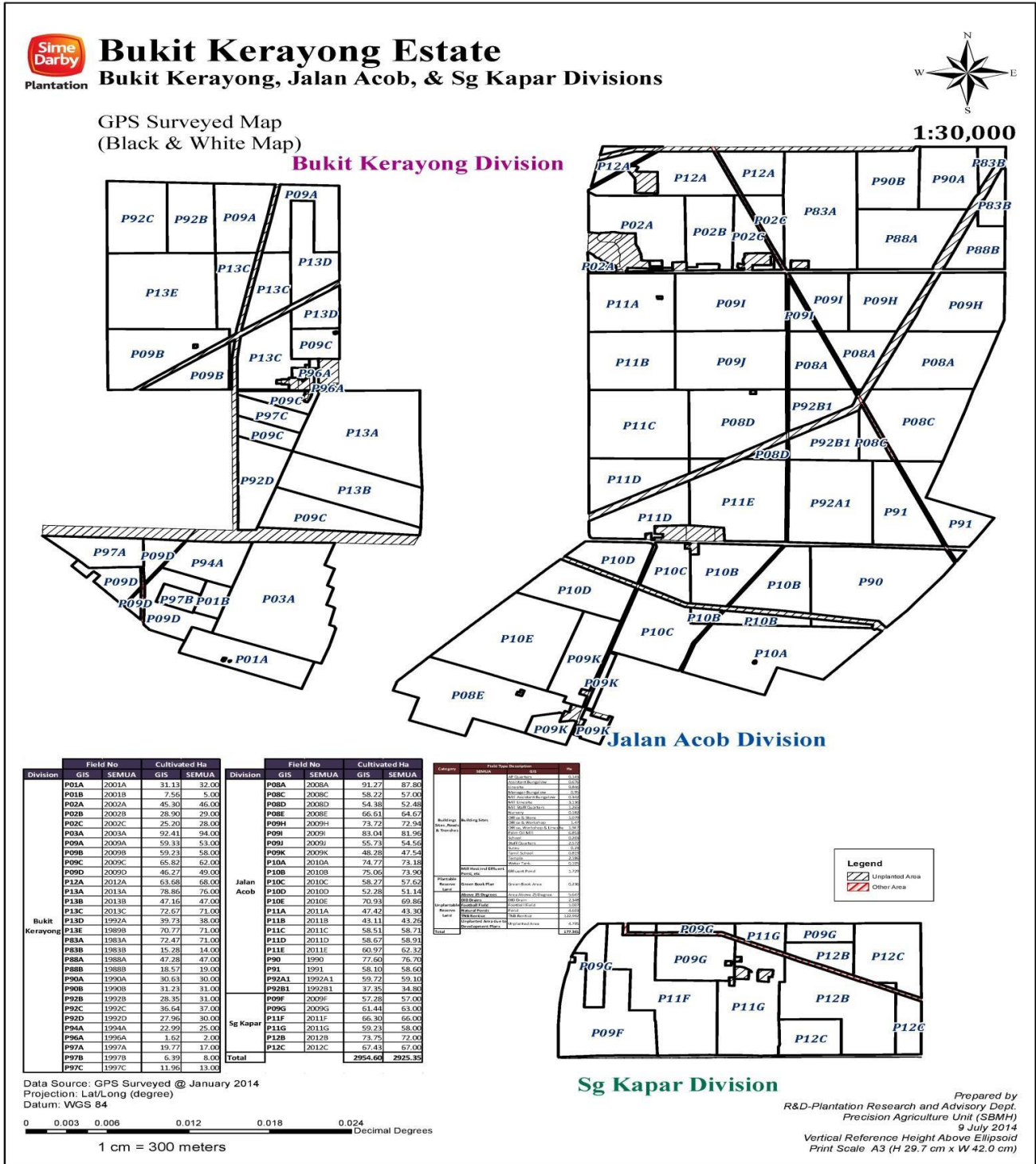
**F. Records of Certified CPO & PK Sold under RSPO Credits to Buyers since the last audit (if any). Period: (*Jan 18 – Dec 18*)**

No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO or PK Sold (mt)
N/A			

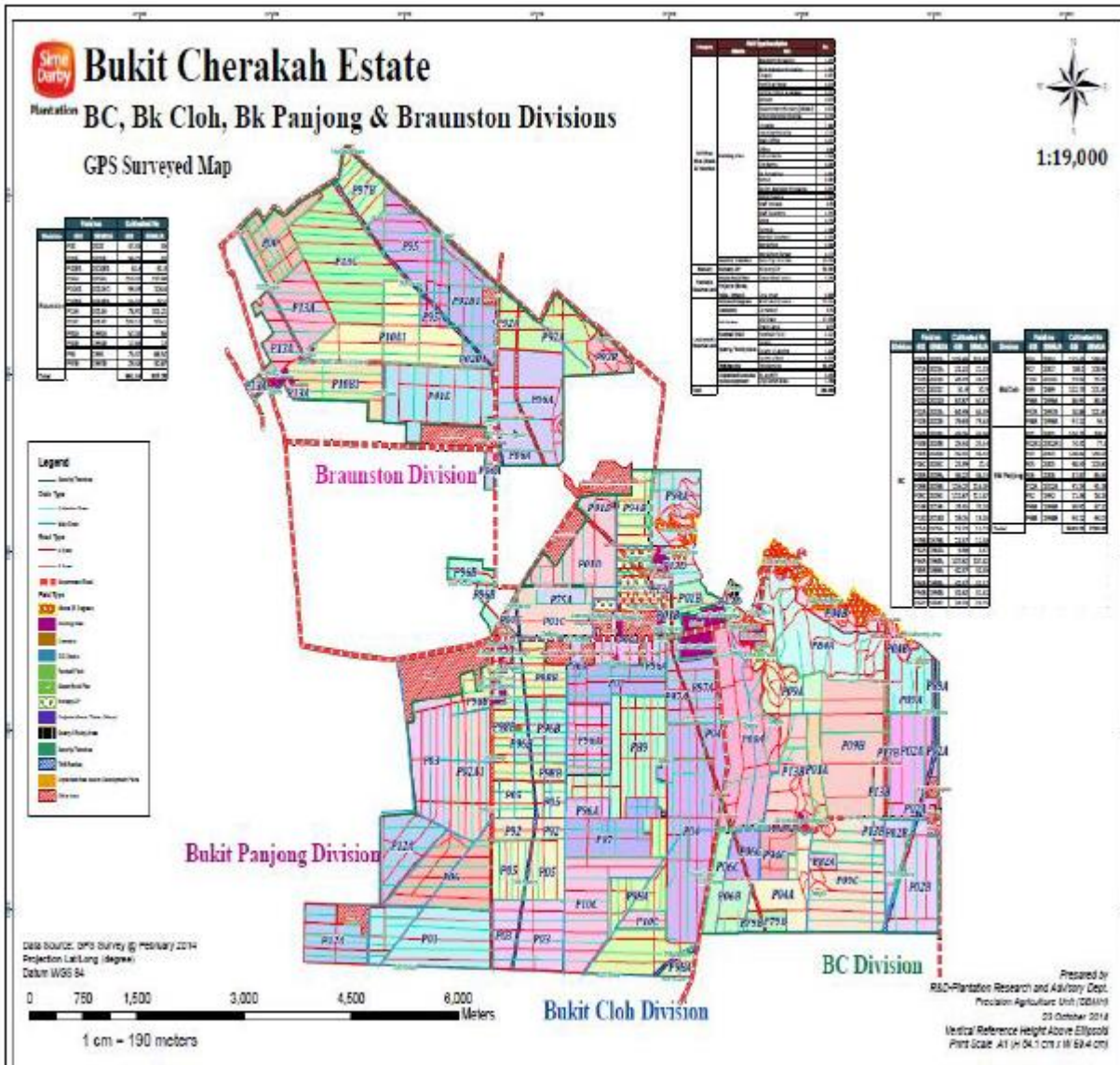
**Appendix F: Location Map Bukit Kerayong Palm Oil Mill Certification Unit and Supply bases**



**Appendix G: Bukit Kerayong Estate Field Map**



**Appendix H: Bukit Cheraka Estate Field Map**



**Appendix I: List of Smallholder Sampled**

Not applicable



## Appendix J: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
BCE	Bukit Cheraka Estate
BKE	Bukit Kerayong Estate
BKPOM	Bukit Kerayong Palm Oil Mill
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
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
SOU	Strategic Operating Unit