

**RSPO PRINCIPLE AND CRITERIA
3RD ANNUAL SURVEILLANCE ASSESSMENT (ASA3_1)
Public Summary Report**

Kulim (Malaysia) Berhad
Head Office: Kulim (Malaysia) Berhad K.B 705 80990 Johor Bahru Johor, Malaysia
Sindora Palm Oil Mill and Supply Base KB 501 86009 Kluang Johor, Malaysia

TABLE of CONTENTS

No	Page
Section 1: Scope of the Certification Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Location(s) of Mill & Supply Bases	4
4. Description of Supply Base	4
5. Plantings & Cycle.....	4
6. Certified Tonnage of FFB (Own Certified Scope)	4
7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable	5
8. Certified Tonnage	5
Section 2: Assessment Process	5
1. Assessment Program.....	6
Section 3: Assessment Findings	8
3.1 Details of audit results	8
3.2 Progress against Time Bound Plan.....	8
3.3 Details of findings	12
3.3.1 Status of Nonconformities Previously Identified and Observations	22
3.3.2 Summary of the Nonconformities and Status.....	23
Assessment Conclusion and Recommendation:	24
Appendix A: Summary of Findings	25
Appendix B: Approved Time Bound Plan.....	67
Appendix C: Certification Unit RSPO Certificate Details.....	68
Appendix D: Assessment Plan.....	69
Appendix E: Stakeholders Contacted	71
Appendix F: Sindora Palm Oil Mill Supply Chain Assessment Report (Module E – CPO Mills – Mass Balance)	72
Appendix G: Location Map of Sindora Palm Oil Mill Certification Unit and Supply bases.....	75
Appendix H: Sindora Estate Field Map	76
Appendix I: REM Estate Field Map	77
Appendix J: List of Smallholder Sampled	79
Appendix K: List of Abbreviations Used.....	80

Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0006-04-000-00	Date	Member since: 8 August 2004
Company Name	Kulim (Malaysia) Berhad		
Address	Head Office : K.B 705, 80990 Johor Bahru, Johor, Malaysia		
Mill Address	Certification Unit : Sindora Palm Oil Mill, K.B. 501, 86009 Kluang, Johor, Malaysia		
Subsidiary of (if applicable)	N/A		
Contact Name	Mrs Salasah Elias		
Website	www.kulim.com.my	E-mail	salasah@kulim.com.my
Telephone	+607 8611611	Facsimile	+607 8631084

2. Certification Information			
Certificate Number	RSPO 612392	Original Certification Date	23/01/2009
		Expiry Date	22/01/2019
Scope of Certification	Production of Palm Oil and Palm Kernel from Sindora Palm Oil Mill and Supply Base (Sindora Estate, Sungai Papan Estate, REM Estate)		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
A43172	MS 1500:2009	JAKIM	30/04/2017
ER 0551	ISO 14001:2004	SIRIM	21/11/2017
EU-ISCC-Cert-DE119-60162024	ISCC	ASG CERT	01/02/2017
MPOB/COP/MF/0003-2	Code Good Milling Practice	MPOB	20/07/2019

RSPO Public Summary Report Revision 4 (November /2016)

3. Location(s) of Mill & Supply Bases

Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Easting	Northing
Sindora Palm Oil Mill	Kluang, Johor, Malaysia	103° 27' 44.316"	1° 59' 7.339"
Sindora Estate	Kluang, Johor, Malaysia	103° 28' 17.976"	1° 57' 48.114"
Sungai Papan Estate	Kota Tinggi, Johor, Malaysia	104° 6' 21.805"	1° 31' 1.257"
REM Estate	Kota Tinggi, Johor, Malaysia	103° 52' 54.958"	1° 42' 12.412"

4. Description of Supply Base

Estate	Mature (ha)	Immature (ha)	Infras & Other (ha)	HCV (ha)	Total Planted (ha)	Total Hectarage	% of Planted
Sindora Estate	2,105.41	1,293.02	518.43	2.20	3,398.43	3,919.06	86.72
Sungai Papan Estate	2,145.51	468.56	362.42	49.39	2,614.07	3,025.88	86.39
REM Estate	1,469.79	279.82	488.75	2.75	1,749.61	2,241.11	78.07
Total	5,720.71	2,041.40	1,369.60	54.34	7,762.11	9,186.05	84.50

Note: Infras = infrastructure

5. Plantings & Cycle

Estate	Age (Years)					Tonnage / Year		
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Actual (Nov 15 – Oct 16)	Estimated (Nov 15 – Oct 16)	Forecast (Nov 16 – Oct 17)
Sindora Estate	1,293.02	1,236.97	212.72	0	655.72	36,459.00	41,419.00	30,815.00
Sungai Papan Estate	468.56	1,234.40	911.11	0	0	54,011.71	47,396.00	53,457.00
REM Estate	279.82	462.77	94.49	427.69	484.84	33,143.74	39,967.00	28,113.00
Total	2,041.40	2,934.14	1,218.32	427.69	1,140.56	123,615.05	128,782.00	112,385.00

6. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year		
	Actual (Nov 15 – Oct 16)	Estimated (Nov 15 – Oct 16)	Forecast (Nov 16 – Oct 17)
Sindora Estate	36,459.00	41,419.00	30,815.00
Sungai Papan Estate	54,011.71	47,396.00	53,457.00
REM Estate	33,143.74	39,967.00	28,113.00
Rengam Estate	-	8,373.00	-
Total	123,694.65	137,155.00	112,385.00

**RSPO Public Summary Report
Revision 4 (November /2016)**

7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Actual (Nov 15 – Oct 16)	Estimated (Nov 15 – Oct 16)	Forecast (Nov 16 – Oct 17)
Others	98,530.15	71,366.00	94,143.00

8. Certified Tonnage									
Sindora Palm Oil Mill	Actual (Nov 15 - Oct 16)			Estimated (Nov 15 – Oct 16)			Forecast (Nov 16 – Oct 17)		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Own Estate	123,615.05	24,854.00	6,840.28	137,155.00	28,287.00	8,002.00	112,385.00	22,997.00	6,218.00
Others	98,530.15	19,810.44	5,452.20	71,366.00	14,719.00	4,164.00	94,143.00	19,264.00	5,208.00
Total	222,145.20	44,664.44	12,292.48	208,521.00	43,006.00	12,166.00	206,528.00	42,261.00	11,426.00

*OER: 20.46%; KER: 5.53% is applicable for Forecast (Nov 16 – Oct 17)

Section 2: Assessment Process

Certification Body:

**RSPO Public Summary Report
Revision 4 (November /2016)**

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: RSPO-ACC-19)
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
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-19) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia. BSI is accredited for RSPO Supply Chain Certification Systems (SCCS) and Principles & Criteria for Sustainable Palm Oil Production (P&C, Single Site & Group) certification Worldwide.

Assessment Methodology, Programme, Site Visits

This on-site 3rd Annual Surveillance Assessment was conducted from 30 November – 2 December 2016. 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 (Sindora Estate & REM Estate). 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 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 P&C MYNI-2014 and RSPO Supply Chain Certification Standard 2014 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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 estates sample were determined based on formula $N = 0.8\sqrt{y}$ where y is the number of estates while when applicable, the smallholders sample were determined following the RSPO Certification Requirement for Group Certification Standard 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 (when applicable) is listed in Appendix J.

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

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

**RSPO Public Summary Report
Revision 4 (November /2016)**

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.

This report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

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

1. Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 4)	Year 5 (ASA 5)
Sindora Palm Oil Mill	√	√	√	√	√
Sindora Estate	√		√	√	
Sungai Papan Estate	√	√		√	√
REM Estate		√	√		√

Tentative Date of Next Visit: October 24, 2017 – October 26, 2017

Total No. of Mandays: 9 mandays

BSI Assessment Team:

Mohd Hafiz Mat Hussain – Lead auditor

He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 14001, 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 2013, Endorsed RSPO P&C Lead Auditor Course in 2014 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since May 2013 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation.

Hoo Boon Han – Team Member

He holds Master of Technology (Environmental Management) from the University Malaya and Bachelor of Science Forestry (Hons) Majored in International Tropical Forestry from University Malaysia Sabah. He has more than 3 years working experience in in environmental monitoring & audit, carbon accounting & reduction, wastewater treatment, waste management and sustainable development. He has successfully completed the RSPO Lead Auditor and RSPO Supply Chain Training in April 2012. He has been involved in RSPO P&C audit in Indonesia and Malaysia as well as RSPO SC audit across different region including Asia, Europe and North America for the past 4 years. During this assessment, he assessed on the aspect of environment, Safety and Health, Legal, social and community engagements, stakeholders consultation, and workers welfare. He is able to speak and understand Bahasa Malaysia, English and Mandarin.

Hu Ning Shing- Team Member

She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in his previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS

RSPO Public Summary Report Revision 4 (November / 2016)

Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.

Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been assessed using the following RSPO normative requirements. The assessment details are provided in Appendix A.

- Kulim (Malaysia) Berhad Time Bound Plan
- RSPO Group Certification Standard 2016 Checklist
- RSPO P&C for Smallholders TH-WG 2012 Checklist
- RSPO P&C GN-NIWG 2010 Checklist
- RSPO P&C INA-NIWG 2016 Checklist
- RSPO P&C PNG-NIWG 2016 Checklist
- RSPO P&C SI-NIWG 2010 Checklist
- RSPO P&C MY-NIWG 2014 Checklist
- RSPO P&C TH-WG 2011 Checklist
- RSPO Supply Chain Certification Checklist November 2014
- RSPO P&C 2013 Generic Checklist

3.2 Progress against Time Bound Plan

Kulim (Malaysia) Berhad has disposed interest in New Britain Palm Oil Ltd in 2014. Kulim (Malaysia) Berhad previously managed the Tunjuk Laut Palm Oil Mill and Supply Base but since October 2013 this has been leased to third party operator (Awan Timur Resources) and Kulim (Malaysia) Berhad no longer manages the operations. Siang Estate previously supplies FFB to Siang Palm Oil Mill which was previously certified under Johor Corporation and now managed by third party. It is not within Kulim (Malaysia) Berhad's management control. Pasir Panjang Palm Oil Mill was under Johor Corporation, and acquired under Kulim (Malaysia) Berhad through Mahamurni Plantations Sdn Bhd in 2012. At the same time Kulim (Malaysia) Berhad has acquired Pasir Panjang Palm Oil Mill through Mahamurni Plantation Sdn Bhd in 2012. Pasir Panjang Palm Oil Mill enter time bound plan as per "work plan Kulim / Jcorp estate" document and due for certification in 2016. Since March 2015 all Jcorp Estate is now supplied to Pasir Panjang Mill which will enter RSPO Certification 2016. However due to new restructuring starting 1st January 2015, seven (7) estate will be under Kulim (Malaysia) Berhad namely Kuala Kabong, Ulu Tiram, Basir Ismail, REM, Labis Bahru, Mutiara and Sungai Sembrong. All other operating unit will be under Mahamurni Plantation Sdn. Bhd.

Kulim (Malaysia) Berhad has 100% ownership in Mahamurni Plantations Sdn Bhd. Mahamurni Plantations Sdn Bhd have 3 palm oil mills i.e.: Sedenak Palm Oil Mill, Palong Cocoa Palm Oil Mill, and Pasir Panjang Palm Oil Mill. Mahamurni Plantations Sdn Bhd also has 9 estates: Sedenak Estate, Sungai Papan which supply to certified Sedenak Palm Oil Mill; Mungka Estate, Kemedak Estate, Palong Estate, Ladang UMAC which supply to certified Palong Cocoa Palm Oil Mill; Rengam Estate supply to certified Sindora Palm Oil Mill. Pasir Panjang Estate will supply to Pasir Panjang Palm Oil Mill, which due for certification by 2016. Kulim (Malaysia) Berhad has 100% ownership in Kulim Plantations (Malaysia) Sdn Bhd. Kulim Plantations (Malaysia) Sdn Bhd has Tereh Palm Oil Mill and 2 estates i.e. Tereh Utara Estate and Tereh Selatan Estate which supply to certified Tereh Palm Oil Mill. Kulim (Malaysia) Berhad has 100%

**RSPO Public Summary Report
Revision 4 (November /2016)**

ownership in Selai Sdn Bhd. Selai Sdn Bhd has Selai Estate and Enggang Estate, both supply to certified Tereh Palm Oil Mill. Kulim (Malaysia) Berhad has 100% ownership in Sindora Berhad. Sindora Berhad has Sindora Estate, supply to certified Sindora Palm Oil Mill and Sungai Tawing Estate, supply to certified Tereh Palm Oil Mill. Kulim (Malaysia) Berhad has 94.49% ownership in Kumpulan Bertam Plantations Berhad. Kumpulan Bertam Plantations Berhad has Sepang Loi Estate supply to certified Palong Cocoa Palm Oil Mill. Kulim (Malaysia) Berhad itself has 7 estates: Basir Ismail Estate, Ulu Tiram Estate, Kuala Kabong Estate supply to certified Sedenak Palm Oil Mill; Sungai Sembrong Estate and Mutiara Estate supply to certified Tereh Palm Oil Mill; REM Estate will supply certified Sindora Palm Oil Mill; Labis Bahru Estate supply to certified Palong Cocoa Palm Oil Mill. BSi concludes that Kulim has completed all of the commitments of its Time Bound Plan that relate to company owned and managed Palm Oil Mills and Estates. The progress with the Pasir Panjang Certification planned will be followed up. During the Initial Assessment;

1. There is no any other isolated lapse in Time Bound Plan.
2. No systematic failures to proceed with implementation of the Time Bound Plan since first certified.
3. The changes in the Time bound Plan for Pasir Panjang Palm Oil Mill is acceptable because the company just took over the management control. Kulim (Malaysia) Berhad has recently purchased a property in Indonesia and undergone the RSPO NPP process to develop the land for oil palm. At the time of preparation of this Report, BSI is not aware of any new issues involving:

- a. Any unresolved significant land disputes;
- b. Any replacement of primary forest or loss of HCVs;
- c. Any labour disputes that are not being resolved through an agreed process;
- d. Any evidence of noncompliance with any law at any of the landholdings. BSI considers that Kulim (Malaysia) Berhad complies with the RSPO requirements for Partial Certification rules.

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	<p><u>Malaysia</u></p> <p>The time bond plan includes all OUs in Malaysia, The Kulim OUs have 32 units, 21 units successfully certified and 6 units current in progress.</p> <p><u>Indonesia (PT SSR ,PT TPR, PT WIN and PT RAJ)</u></p> <p>For the Indonesia plantation have in preparation to undergo the RSPO Certification process is in progress.</p>	Yes

**RSPO Public Summary Report
Revision 4 (November /2016)**

<p>Is the time bound plan challenging?</p> <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	<p>Kulim (Malaysia) Berhad has in 2015 continued to operate in a dynamic and volatile environment, characterised by abundant of supplies and lower price of CPO globally.</p> <p>Being one of the lowest price for the commodity, this much affected our plantation margins. The industry was also impacted by growing strength of US Dollar adding the downward pressure of the price</p> <p>The divestment from New Britain (NBPOL) was completed on 26 February 2016, operationally at the year ended 31 December 2016, Kulim (Malaysia) Berhad have plantation operations in Peninsular Malaysia and Central Kalimantan Indonesia for a total of 50 999 ha in Malaysia and 40 646 ha of land in Indonesia. The planting of new palm is ongoing albeit at a slower pace and have some 307 ha been planted.</p> <p>Age profile ranging from 0 – 23 years of age. The group remains committed to improving the age profile, during which a total of 1155 ha been replanted. Average age profile has improved to 11.72 years.</p> <p>The group has acquired Pasir Panjang Palm Oil Mill through Mahamurni Plantation Sdn Bhd in March 2015. And has since planned and prepared the mill for certification program for end of 2016</p>	
<p>Have there been any changes since the last audit? Are they justified?</p>	<p>No significant changes since the last audit.</p>	<p>Yes</p>
<p>If there have been changes, what circumstances have occurred?</p>	<p>KULIM is now corporatized under Johor Corporation but at the same time both are still a members of RSPO.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>So far there no comments received.</p>	<p>Yes</p>
<p>Have there been any newly acquired subsidiaries?</p>	<p>After successfully acquired PT Win in central Kalimantan, Kulim has again trying their best to acquire PT AMARA which is still in progress with expected completion in 2017.</p>	<p>Yes</p>
<p>Have there been any isolated lapses in implementation of the plan?</p>	<p>There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to our mill.</p>	<p>Yes</p>

**RSPO Public Summary Report
Revision 4 (November / 2016)**

Un-Certified Units or Holdings		
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Indonesia AMDAL report had been completed and report already submitted to RSPO for Public Notification. RSPO has approved the NPP.	Yes
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	So far no new planting that replaced primary forest.	Yes
Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	No new planting activities within uncertified unit.	Yes
Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	No land conflict	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	No labour dispute	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	RSPO internal audit assessment for all certified units been conducted and the report had been submitted to all unit for improvement plan.	Yes
Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	No legal non compliance	Yes

3.3 Details of findings

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

During the 3rd Annual Surveillance Assessment there were six (6) Major & four (4) Minor nonconformities raised. The Sindora 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 it effectiveness and closed accordingly.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1413166M1	<p>Requirements: Indicator 2.1.1 Evidence of compliance with relevant legal requirements shall be available. F.M (Noise Exposure) Regulation 1989, Sect. 23:Retest. If the registered medical practitioner, after reviewing the annual and baseline audiograms of the employee and after taking into consideration the effect of temporary threshold shift, is of an opinion that a standard threshold shift has occurred, he shall notify the occupier and the occupier shall retest the employee within three months from the date of the last audiometric test.</p> <p>Evidence of Nonconformity: Audiometric testing was conducted on 22/5/16 by Industrial Safety Management Services. However, No retest was conducted to the worker/operator that was found with standard threshold shift during audiometric test. 1. 790827016107 (Boilerman)</p> <p>Statement of Nonconformity: Retest audiometric for worker/operator who was found with STS (Standard Threshold Shift) was not conducted accordingly.</p> <p>Corrective Actions Correction & Corrective Action: <ol style="list-style-type: none"> 1. KSTS to ensure all the findings from audiometric test report will be briefed accordingly to the operating units – to emphasis on the requirement of follow-up assessment/ re-test if there' any. 2. The communication/briefing was conducted on 31/1/2017 by the management of Kulim (M) Berhad at Kulim training centre. 3. Periodical follow up and monitoring by KSTS on any follow-up assessment/re-test cases. 4. Special arrangements was made for the retest of said worker by previous service provider. 5. The re-test was conducted on 1/12/16 and report was issued on the same day. 6. Mill management has declared and submit the retest result to JKKP through JKKP 7 form on 15/12/16. </p> <p>Assessment Conclusion: The briefing was conducted on 31/1/2017 by the management of Kulim (M) Berhad at Kulim training centre to all operation units (Mills and Estates) to ensure no recurrence happened in future. Sighted the attendance list and slides. Closed on 01/02/2017.</p>	Major

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1413166M3	<p>Requirements: Indicator 7.3.2 A comprehensive HCV assessment, including stakeholder consultation, shall be conducted prior to any conversion or new planting. This shall include a land use change analysis to determine changes to the vegetation since November 2005. This analysis shall be used, with proxies, to indicate changes to HCV status.</p>	Major
	<p>Evidence of Nonconformity: No evidence to show that the new planting/conversion plot P14 and P15B incorporated in the new HCV assessment especially on land use change analysis.</p>	
	<p>Statement of Nonconformity: HCV assessment was not comprehensively conducted.</p>	
	<p>Corrective Actions Correction & Corrective Action: 1. SSD to come out with SOP for conversion area, to be included and communicated to all Operating Units and respective supervising departments. The Standard Operating Guidelines For Conversion of Old Crops Other Than Oil Palm To oil Palm (Dated:January 2017) was sighted. 2. Communication/ briefing was carried out for all operating units. The briefing was conducted on 31/1/2017 by the management of Kulim (M) Berhad at Kulim training centre. 3. Estate with assistance of AASD was provided land satellite image (LUCA) (dated:25/01/17) of respective ex-rubber area (conversion area) for the duration of; a) before 2005 b) during the conversion / felling c) current status of the said converted area to oil palm</p>	
	<p>Assessment Conclusion: The briefing was conducted on 31/1/2017 by the management of Kulim (M) Berhad at Kulim training centre to all operation units (Mills and Estates) to ensure no recurrence happened in future. Sighted the attendance list and slides. Closed on 01/02/2017.</p>	

**RSPO Public Summary Report
Revision 4 (November /2016)**

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1413166M4	Requirements: Indicator 7.8.1 The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated.	Major
	Evidence of Nonconformity: No evidence of carbon stock assessment analysis was conducted for the conversion plot P14 and P15B.	
	Statement of Nonconformity: The carbon stock assessment analysis was not comprehensively conducted.	
	Corrective Actions Correction and corrective action: <ol style="list-style-type: none"> SSD to come out with SOP for conversion area, to be included and communicated to all Operating Units and respective supervising departments. Communication/ briefing was carried out for all operating units. The briefing was conducted on 31/1/2017 by the management of Kulim (M) Berhad at Kulim training centre. SSD to identify and initiate the carbon assessment for the area by using RSPO Palm GHG tools and at the same time to also seek assistance from MEC (Malaysian Environmental Consultant) as to streamline the assessment and the result. The assessment report, dated: 31/1/17 was sighted. 	
	Assessment Conclusion: The briefing was conducted on 31/1/2017 by the management of Kulim (M) Berhad at Kulim training centre to all operation units (Mills and Estates) to ensure no recurrence happened in future. Sighted the attendance list and slides. Closed on 01/02/2017.	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1413166M5	Requirements: Indicator 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

	<p>Evidence of Nonconformity: Sindora Estate: The employment contract for the contractors' workers were not stated the terms and conditions such as annual leave and public holiday leave entitlement, overtime rate, dismissal reason and etc. Sampled contracts as below: a) Passport No.: B4359426 who joined on 8/11/2016 (Sindora Estate Contractor's Worker) b) Passport No.: A7959982 who joined on 21/6/2016 (Sindora Estate Contractor's Worker) c) Passport No.: B2359522 who joined on 1/11/2016 (Sindora Estate Contractor's Worker) d) I/C No.: 57XXXX-XX-6803 who joined on 15/2/2016 (Sindora Estate Contractor's Worker)</p> <p>Statement of Nonconformity: 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.) for contractors' workers were not implemented effectively.</p> <p>Corrective Actions Correction and corrective action: 1. Purchasing and Contract Department to have "Standard Standing Instruction and compliance commitment" with regards to Contractors' commitment and acknowledgements on statutory Compliance to all relevant laws and regulations. company, amongst other things to be included are : a) Worker' employment contract b) Workers' Insurance Coverage c) Permit to Work conditions. 2. Communication/ briefing was carried out for all operating units. The briefing was conducted on 31/1/2017 by the management of Kulim (M) Berhad at Kulim training centre. 3. The Commitment should be acknowledged by all contractors before approving any new contract or any extension of contract. 4. Contractors involved :- Agro Sakthi Enterprise, TBK Plantation Works and Lai Brothers Development has revised their employment contract with their workers and includes details in their terms and conditions such as annual leave, public holiday leave entitlement, overtime rate, dismissal reason and etc. as per attachment.</p> <p>Assessment Conclusion: 1. The communication (email and memo) was sighted, dated 25/1/2017 from Purchasing and contract department to regional heads, regional controllers, head of sustainability and quality department to ensure no recurrence happened in future. 2. The briefing was conducted on 31/1/2017 by the management of Kulim (M) Berhad at Kulim training centre to all operation units (Mills and Estates) to ensure no recurrence happened in future. Sighted the attendance list and slides. Closed on 01/02/2017.</p>	
--	--	--

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1413166M6	<p>Requirements: Indicator 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.</p>	Major
	<p>Evidence of Nonconformity: All operating units: Kulim (M) Berhad did not develop policy to protect the reproductive rights of all.</p>	
	<p>Statement of Nonconformity: Policy to protect the reproductive rights of all, especially of women was not available.</p>	
	<p>Corrective Actions Correction and corrective action:</p> <ol style="list-style-type: none"> 1. The policy' review will be communicated to all OUs, Road show and training will be carried out to all level of employers and this will be included in our yearly training programme. 2. Communication/ briefing was carried out for all operating units. The briefing was conducted on 31/1/2017 by the management of Kulim (M) Berhad at Kulim training centre 3. Review will be carried out to ensure the inclusion of reproductive right in the respective policy. 4. Submission of improvement time line has been approved by KULIM 236 EXCO Meeting. 5. The policy which was signed by Executive Director of Kulim (Malaysia) Berhad was sighted. 	
	<p>Assessment Conclusion: The briefing was conducted on 31/1/2017 by the management of Kulim (M) Berhad at Kulim training centre to all operation units (Mills and Estates) to ensure no recurrence happened in future. Sighted the attendance list and slides. Closed on 01/02/2017.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1413166M7	<p>Requirements: Indicator 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.</p> <p>Evidence of Nonconformity: As recommended in the Sindora Estate HCV assessment report table 6.1, activities such as review of HCV management capacity, planning, implementation and monitoring HCV Management at a group level did not implement accordingly.</p> <p>Statement of Nonconformity: The HCV management plan did not implement effectively.</p> <p>Corrective Actions Correction and corrective action:</p> <ol style="list-style-type: none"> 1. SSD will provide implementation timeline of the recommendation of HCV management for top management approval. 2. STANDARD PROCEDURES OF OPERATION (BIODIVERSITY) – SPO IMPROVEMENT PROGRAM FOR HCV AND BIODIVERSITY ASSESSMENT was sighted. 3. Biodiversity Improvement Plan 2017 which was prepared by Biodiversity Coordinator was sighted. 4. "Prosedur Pengurusan Konflik Hidupan Liar Dalam Ladang" was sighted. 5. Communication/ briefing was carried out for all operating units. The briefing was conducted on 31/1/2017 by the management of Kulim (M) Berhad at Kulim training centre <p>Assessment Conclusion: The briefing was conducted on 31/1/2017 by the management of Kulim (M) Berhad at Kulim training centre to all operation units (Mills and Estates) to ensure no recurrence happened in future. Sighted the attendance list and slides. Closed on 01/02/2017.</p>	Major

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1413166N1	<p>Requirements: Indicator 4.7.5 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.</p>	Minor
	<p>Evidence of Nonconformity: The inventories for first aid boxes at the Sindora Estate were insufficient. 1. Harvesting at P08/1 2. Spraying at P10/5 3. Manuring P15A</p>	
	<p>Statement of Nonconformity: The emergency procedure is not implemented effectively.</p>	
	<p>Corrective Actions Correction and corrective action: 1. KSTS to conduct a refresher training on the said requirements and to ensure standard understanding of all HA' on the First Aid requirement. 2. Monitoring of first aid kit and inventory check by HA on monthly basis, to be recorded and verified by manager.</p>	
	<p>Assessment Conclusion: Accepted on 9/12/16, the effectiveness of the corrective action will be verified during the next assessment.</p>	

**RSPO Public Summary Report
Revision 4 (November /2016)**

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1413166N2	Requirements: Indicator 7.1.2 Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts.	Minor
	Evidence of Nonconformity: The operational procedures have not been developed for conversion of rubber to oil palm (P14 and P15B).	
	Statement of Nonconformity: The operational procedure for conversion of rubber to oil palm was not developed and implemented accordingly.	
	Corrective Actions Correction and corrective action: 1. Annual Refresher to be conducted to all OUs and respective departments involved. 2. SOP Completion by 1 st quarter of 2017.	
	Assessment Conclusion: Accepted on 9/12/16, the effectiveness of the corrective action will be verified during the next assessment.	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1413166N3	Requirements: Indicator 7.8.2 There shall be a plan to minimise net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options.	Minor
	Evidence of Nonconformity: No plan was established to minimise GHG emissions for conversion of rubber to oil palm (P14 and P15B)	
	Statement of Nonconformity: No plan to minimise net GHG emissions was established at Sindora Estate.	
	Corrective Actions Correction and corrective action: 1. SSD to come out with SOP of conversion area. Completion by end of March 2017	
	Assessment Conclusion: Accepted on 9/12/16, the effectiveness of the corrective action will be verified during the next assessment.	

**RSPO Public Summary Report
Revision 4 (November / 2016)**

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1413166N4	Requirements: Indicator 4.7.6 All workers shall be provided with medical care, and covered by accident insurance.	Minor
	Evidence of Nonconformity: Sindora Estate: 3 contract workers' from TBK Plantation Works: 1. B2359522 2. AS011362 3. A7959982	
	Statement of Nonconformity: At Sindora Estate, three foreign workers were found not covered by accident insurance (foreign workers compensation scheme).	
	Corrective Actions Correction and corrective action: 1. SSD to conduct stakeholders / contractors awareness program to refresh the RSPO awareness to all company contractors. 2. Operating Unit to ensure all the contractors provide them a copy of passport, work permit, contract agreement and workers insurance coverage of all contractors' foreign workers before work commencement.	
	Assessment Conclusion: Accepted on 9/12/16, the effectiveness of the corrective action will be verified during the next assessment.	

Observation	
OBS #	Description
Nil	Nil

Positive Findings	
PF #	Description
1	Good commitment present from management and all personnel involved were very cooperative during the assessment process
2	Interview with both male and female employees indicate understanding of their rights
3	Employees indicated positive impacts to their livelihood as mill and estates employee

Issues raised by Stakeholders	
<p>Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Sindora Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.</p> <p>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. These have been incorporated into the assessment findings.</p> <p>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 Appendix E.</p>	
IS #	Description
1	<p>Issues: NUPW Representative – He explained that the pay and conditions was according to Minimum Wage Order 2016. They were provided with housing and amenities such as medical assistant and transport to send children to school.</p> <p>Management Responses: The management will continue to comply with the legal requirement.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Issues: Workers’ Representative – They were satisfied with the management and informed that the management treated them equally without any discrimination based on nationality.</p> <p>Management Responses: The management acknowledged and will continue to treat all the workers without prejudice and discrimination.</p> <p>Audit Team Findings: No other issue.</p>
3	<p>Issues: Contractors – They informed that the payment was made promptly and they signed contract agreement with the management.</p> <p>Management Responses: The management has made payment promptly according to the agreement signed.</p> <p>Audit Team Findings: Document review on the payment records and contract agreements found that no issue sighted.</p>
4	<p>Issues: Felda Ulu Belitong Village – No land dispute was reported. They have good relationship with the management.</p> <p>Management Responses: The management has maintained trenches and pegging to demarcate the boundaries.</p> <p>Audit Team Findings:</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

	No further issue.
5	Issues: Workshop Station: Worker well aware the emergency procedures such as first aid box and contacts number. In the workshop, oil trap was used to prevent any pollution. Periodic cleaning and inspection to ensure no contamination of diesel or lubricant oil.
	Management Responses: Management will continue maintain the good practice in the workshop.
	Audit Team Findings: No further comments.

3.3.1 Status of Nonconformities Previously Identified and Observations

All the previous Major nonconformities raised during ASA1 were followed up and remain closed. For ASA2, no nonconformity was raised. The NCR raised during this audit, ASA3 against indicator 2.1.1 is related to audiometric test which is a different issue from NCR raised during ASA1 (no chemical exposure monitoring and analysis report of domestic water supplied to the foreign workers housing was not available).

Non-Conformity		
NCR #	Description	Category (Major / Minor)
	Requirements: -NIL-	
	Evidence of Nonconformity:	
	Statement of Nonconformity:	
	Corrective Action:	
	Assessment Conclusion:	

Observation	
OBS #	Description
	Nil

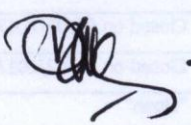

**RSPO Public Summary Report
Revision 4 (November / 2016)**

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
CR01	Minor	24/07/2008	Closed on 21/01/2010
CR03	Minor	27/07/2008	Closed on 21/01/2010
CR05	Minor	21/01/2010	Closed on 13/01/2011
CR06	Minor	13/01/2011	Closed on 05/11/2011
CR07	Minor	12/11/2012	Closed on 03/12/2013
CR10	Major	10/12/2013	Closed on 06/02/2014
CR11	Minor	10/12/2013	Closed on 25/01/2014
1123525M1	Major	13/11/2014	Closed on 10/01/2015
1123525M2	Major	13/11/2014	Closed on 10/01/2015
1413166M1 – 2.1.1	Major	02/12/2016	Closed on 01/02/2017
1413166M3 – 7.3.2	Major	02/12/2016	Closed on 01/02/2017
1413166M4 – 7.8.1	Major	02/12/2016	Closed on 01/02/2017
1413166M5 – 6.5.2	Major	02/12/2016	Closed on 01/02/2017
1413166M6 – 6.9.2	Major	02/12/2016	Closed on 01/02/2017
1413166M7 – 5.2.2	Major	02/12/2016	Closed on 01/02/2017
1413166N1 – 4.7.5	Minor	02/12/2016	“Open”
1413166N2 – 7.1.2	Minor	02/12/2016	“Open”
1413166N3 – 7.8.2	Minor	02/12/2016	“Open”
1413166N4 – 4.7.6	Minor	02/12/2016	“Open”

**RSPO Public Summary Report
Revision 4 (November /2016)**

Assessment Conclusion and Recommendation:

<p>Based on the findings during the assessment Sindora Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C Malaysian National Interpretation (MY-NI 2014) and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of Sindora Palm Oil Mill Certification Unit is approved and continued.</p>	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Puan Salasah Elias	Name: Mr Mohd Hafiz Mat Hussain
Company name: Kulim (Malaysia) Berhad Sindora Palm Oil Mill	Company name: BSI Services Malaysia Sdn. Bhd.
Title: Head of Sustainability Department	Title: Lead Auditor
Signature: 	Signature: 
Date: 16 February 2017	Date: 2 nd February 2017

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: 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 -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. In company website (http://www.kulim.com.my/), publicly available documents such as OSH plan, HCV documents, negotiation procedure, complaint records, sustainability handbook and report, EIA, Management Plans & Continuous Improvement Plans. Other sensitive information such as land title and etc will be provided upon request.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	All operating units maintain records of information request and response. Request for information are attended promptly and confirmed by stakeholders interviewed. In the mill, there is an enquiry register record. For example, the latest enquiries dated 1 June 2016, MPOB inspected the mill for the process and production. Based on Annual Inspection Book of Jabatan Keselamatan & Kesihatan Pekerjaan (JKKP), officer inspected the mill for certification of machinery on 27 Nov 2016. Department of Environment Visit Record Book: officer visited the POM on 15 Nov 2016 and 27 Sep 2016, comments recorded in the book. In Sindora and R.E.M estate, enquiry register record made available during onsite visit. The enquiry book recorded complaint, requisition and visit/inspection.	Complied
Criterion 1.2: 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.			

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>There is a SPO Transparency Program under Kulim Malaysia Berhad. The procedure is to ensure that documents if to be release and made publicly available are readily available.</p> <p>The Corporate Dept will ensure that the following documents are available if requested and they do not impinge on confidentiality and will not cause detrimental sustainability or social outcoments.</p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> • Land title (held as hard copy by the property department) • Health and safety plan • Plans and impact assessment- environmental & social • Pollution prevention plans • Details of complaints and grievances • Negotiation procedures • Continuous improvement plan • Biodiversity plans • Policy documents (sustainability handbook) <p>In addition to the website, the policies were also displayed at various locations at the operating units including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p> <p>Records such as enquiry register and record of government visit documented the visit or request from the stakeholders. Based on Annual Inspection Book of Jabatan Keselamatan & Kesihatan Pekerjaan (JKKP), officer inspected the mill for certification of machinery on 27 Nov 2016.</p>	<p>Complied</p>
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>		
<p>1.3.1</p> <p>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.</p> <p>-Minor compliance</p>	<p>Kulim Malaysia Berhad has established policy on code of ethical conduct and integrity which covers all operations in the plantation operation under Corporate Policy Statement dated 11 February 2015. Besides, the Operation Director of Kulim (Malaysia) Berhad Policy also signed on the integrity pledge on 7 Jan 2014 to set the "Tone from the Top" and oblige all members of the organization to likewise behave with integrity and carry on their responsibilities ethically.</p> <p>The policy displayed on the notice board and communicated to employees.</p> <p>In Sindora POM, policy training had provided to all the workers on 5 Sep 2016. Attendance list and signed of code of business conduct sighted during onsite visit. Interviewed with employees reveal that they are aware of the policy. Similar training conducted in other estates, i.e. R.E.M estates- 20 Sep 2016; policy training.</p>	<p>Complied</p>
<p>Principle 2: Compliance with applicable laws and regulations</p>		

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.		
2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance -	<p>Legal register covering the applicable local and international laws and regulations are available. Compliance to each applicable law and regulation is monitored by the operating units and head office sustainability team.</p> <p>Among licences and permits sighted at the visited operating unit were:</p> <p><u>Sindora Mill</u></p> <ul style="list-style-type: none"> - MPOB license 500263204000; expiring in 30 June 2017 - DOE Licence: No License 001580 (validity period 1/7/2016 - 30/6/2017) for 40MT/hr and method of POME discharge is furrow system and slurry application with BOD 100mg/l final discharge limit and composting EFB - BAKAJ- River water extraction license permit (No: 08/A/Klg/041) - SPAN Water treatment License (Lincese no: SPAN/EKS/PT/800-4(1)/7/15 - Certified environmental professional in the treatment of palm oil mill effluent (CePPOME/15005) - Certified environmental professional in schedule waste management (CePSWaM/16254) - Weighbridge calibration (License: JKL- ATK008755 and JKL-ATK 110780) - Permit Barang Kawalan Berjadual- Storage of Diesel (no: J027587) - Air Receiver Tank (JHT PMT 20895; expiring 09 Dec 2016); Vacuum Oil Dryer (PMT107954; expiring 30 April 2017); <p><u>Sindora Estate</u></p> <ul style="list-style-type: none"> - Permit Barang Kawalan Berjadual- Storage of Diesel (no: J025068) - MPOB license 501863602000; expiring in 30 Nov 2017 - Compressor License: PMT JHT117884; expiring 03 Jan 2017 <p><u>R.E.M Estate</u></p> <ul style="list-style-type: none"> - Permit Barang Kawalan Berjadual- Storage of Diesel & Petrol (no: J016997 and J016005) - MPOB license 501259002000; expiring in 31 Nov 2017 - Compressor License: PMT JHT117884; expiring 03 Jan 2017 - Weighbridge calibration permit- B1615404 - Air compressor- JHPMT 17786 expiring 31 Dec 2016 <p><u>F.M (Noise Exposure) Regulation 1989</u> Audiometric testing was conducted on 22/5/16 by Industrial Safety Management Services. However, No retest was conducted to the worker/operator that was found with standard threshold shift during audiometric test. 1. 790827016107 (Boilerman)</p> <p>Thus, major NCR was raised.</p>	<p>Major nonconformance</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	<p>All operating units maintain documented system for identifying, evaluating, reviewing and updating applicable regulations and other requirements. Legal and Other Requirement Register dated 1-Aug-16 was sighted at the visited operating units. For example,</p> <ul style="list-style-type: none"> i. Minimum Wages Order 2016 ii. Minimum Retirement Act 2012 iii. SPAN license conditions iv. BAKAJ license conditions v. Factory and Machinery Act Amendment 2014 vi. CLASS Regulations 2013 vii. Compliance Schedule @ "Jadual Pematuhan" for Sindora Mill, license# 001580 viii. Details of other applicable regulations and sub-regulations under FMA 1967 and OHS 1994. ix. Industrial Code of Practice for Confined Space 2010. <p>Similar legal register sighted in the estates including Sindora and R.E.M estates.</p>	Complied
2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -	<p>Evaluation of legal requirements and compliance status with legal requirement is monitored by operating units, Sustainability Team, OHS Department and head office audit Department.</p> <p>Besides, the internal audit conducted by the sustainability team from HQ will able to check on the compliance status of the operating unit. The latest internal audit for Ladang Sindora POM conducted on 21 Aug 2016; Sindora Estate- 21 Aug 2016; R.E.M Estate- 23 August 2016</p>	Complied
2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	<p>Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office. Kulim (Malaysia) Berhad have centralised system for tracking any changes in the law.</p>	Complied
<p>Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>		
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>Similar to last assessment, land ownership such as land title and land lease documents is available. There is no change in the land ownership. All the land belongs to Kulim (Malaysia) Berhad. Sampled of land title sighted at the visited operating units:</p> <p><u>Mill and Sindora Estate</u> Hold 4 land titles (HS (D) 17659; 17660; 17661; 17662; 3919.06ha</p> <p><u>R.E.M Estate</u> Hold 14 land titles in total 2,240.96 ha</p>	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	During the field visit it was noted that legal boundaries are clearly demarcated and visibly maintained throughout the estate. For example, visited in Sindora estate block P16B, boundary peg in red and white colour sighted at the boundary. Mill is located inside the Sindora Estate and sharing the estate boundary.	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 in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	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 in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	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 in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	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 in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied
Criterion 2.3: 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 estate lands are legally owned and leased by the company. The existing estates are not encumbered by any customary land rights. Interviewed with the neighboring villager found that no land dispute was reported.	Complied

**RSPO Public Summary Report
Revision 4 (November / 2016)**

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 -	The estate lands are legally owned by the company and no other users were identified within the land area.	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	The estate lands are legally owned by the company and no other users were identified within the land area.	Complied
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	The estate lands are legally owned by the company and no other users were identified within the land area.	Complied
Principle 3: Commitment to long-term economic and financial viability		
Criterion 3.1: 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 -	Sindora Palm Oil Mill (SPOM) and supply bases have established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Budget and 5 years management plan (projections 2017- 2021) was verified during the audit. Sindora Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year.	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

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 -	The replanting programme was established. Sighted Replanting Programme 2016-2041: <table border="1" data-bbox="662 443 1141 728"> <thead> <tr> <th>Year</th> <th>Estate</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>Sindora</td> <td>412.53</td> </tr> <tr> <td>2017</td> <td>Estate</td> <td>273.10</td> </tr> <tr> <td>2018</td> <td></td> <td>382.62</td> </tr> <tr> <td>2019</td> <td></td> <td>-</td> </tr> <tr> <td>2016</td> <td>Rem Estate</td> <td>124.37</td> </tr> <tr> <td>2018</td> <td></td> <td>-</td> </tr> <tr> <td>2019</td> <td></td> <td>239.15</td> </tr> <tr> <td>2020</td> <td></td> <td>-</td> </tr> </tbody> </table>	Year	Estate	Ha	2016	Sindora	412.53	2017	Estate	273.10	2018		382.62	2019		-	2016	Rem Estate	124.37	2018		-	2019		239.15	2020		-	Complied
Year	Estate	Ha																												
2016	Sindora	412.53																												
2017	Estate	273.10																												
2018		382.62																												
2019		-																												
2016	Rem Estate	124.37																												
2018		-																												
2019		239.15																												
2020		-																												
Principle 4: Use of appropriate best practices by growers and millers																														
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.																														
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	<p>Quality & Environmental Management Manual (SM/QEMM), dated:19/7/16, Procedure Manual (SM/PM), dated:19/7/16, Working Instruction (SM/WI), dated:25/10/16 and Safe Operating Procedure (LTM/SOP), dated: 10/12/12 for LTPOM was established to cover all the station. Sighted some of the procedure related to loading ramp, sterilization station, threshing and press station, clarification station, kernel station, depericarper station, kernel station, effluent treatment plant, boiler house, power house, water treatment plant and etc.</p> <p>Work Instructions have been derived from SOPs and are posted at work stations at the mill and at certain locations at the estates, such as the Muster Notice Boards. Eg: Landfill Management Guidelines, WI: Labelling, Handling, storage and disposal of Scheduled Waste, WI: Cleaning/Desilting of Sludge Pit and mixing ponds, WI: Waste Management, WI: Handling of chemicals, WI: Disposal of used containers and worn tyres, WI: Usage of hearing devices, WI: Control of diesel consumption, WI: Control of water consumption, WI: Emergency Response Procedure for Injuries/ Fire and Boiler, SOP: Fogging, SOP: Working at Height, SOP: Confined Space, SOP: Oxy-Acetylene Set, SOP for Welding Set, WI: Control of boiler black smoke emission, and etc.</p> <p>Kulim (M) Berhad Agricultural Manual has established covers Replanting, roads drains Bridges culverts and fences, construction of estate building, manuring including POME and Bio compost, harvesting, pruning and ablation, soil conservation, justification of chemical use, weed management, integrated pest management and plant diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management including composting site operation.</p>	Complied																											

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
4.1.2 A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	<p>Internal Audit was conducted twice a year by Sustainability department, the latest internal audit was conducted on 21/8/16 (SPOM), 21/8/2016 (SE) and 23/8/16 (REM Est) to cover the entire criterion stated in the standard.</p> <p>Mill Inspectorate Visit for Sindora Palm Oil Mill (SPOM) was conducted on 10/10/2016 by Hj Mohd Jaafar Abu Bakar (Mill Inspector).</p> <p>Plantation Inspectorate visit at Sindora Estate was conducted on 14-15/9/2016 by Tn. Hj Samsuddin Saha.</p> <p>Plantation Inspectorate visit REM Estate was conducted on 16-17/10/2016 by Tn. Hj Mohd Yassin Hamzah.</p>	Complied
4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	All records related to Internal Audit, Mill Inspector and Estate Inspector Visit was maintained and available at Mill and Estate Office.	Complied
4.1.4 The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Sindora Palm Oil Mill weighbridge clerk verify and record third party FFB purchased by the mill. There are total 3 group estates and 8 out-growers which send their FFB to the mill.	Complied
<p>Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>		
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 -	<p>Kulim (M) Berhad Agriculture Manual has established covers Replanting, roads drains Bridges culverts and fences, construction of estate building, manuring, harvesting, pruning and ablation, soil conservation, justification of chemical use, weed management, integrated pest management and plant diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management. The related SOP, namely Leaf and Soil Sampling Notes procedure was sighted.</p> <p>All estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices consistently monitored by estate operation management and estate inspectorate. The recommendations for improvements are given to maintain the sustainable practices.</p>	Complied

**RSPO Public Summary Report
Revision 4 (November / 2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.2 Records of fertiliser inputs shall be maintained. - Minor compliance -</p>	<p>Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators.</p> <p><u>Sindora Estate</u> Agronomist report by R&D department dated 28/10/2015, fertilizer recommendation 2016 was done by agronomist :</p> <ol style="list-style-type: none"> 1. AS : 615.43 mt 2. ERP: 25.09 mt 3. HGFB: 4.15 mt 4. Kieserite: 97.90 mt 5. MIX 1: 188.07 mt 6. MIX2+ B: 33.09 mt <p>The latest application was carried out at P06 Block 1 (SE) on 25/10/16 for Mix 2 (2kg/palm).</p> <p><u>REM Estate</u> Agronomist report by R&D department dated 11/1/16, fertilizer recommendation 2017 was done by agronomist :</p> <ol style="list-style-type: none"> 1. AS : 244.54 mt 2. CPD 44: 295.72 mt 3. Kieserite: 36.06 mt 4. MIX 1: 363.68 mt 5. MIX2+ B: 78.28 mt 6. MOP: 122.36 mt <p>The latest application for AS was carried out at P13/2 on 28/7/16 at 2kg/palm.</p>	<p>Complied</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

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. - Minor compliance -</p>	<p>Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conduct for every year while for soil analysis, the frequency for soil sampling is conducted at 5 years intervals (Leaf and Soil Sampling Notes Procedure-Kulim (M) Bhd). The procedure Leaf Sampling Analysis by FGV Ladang Paloh was described on the method to conducted leaf and soil sampling.</p> <p><u>Sindora Estate</u></p> <p>Foliar analysis was conducted on 28/3-6/4/16 and the samples were sent to UTCL Laboratory for tested. The foliar analysis report (L1/1604/SIN/0310-0322, 0341-0353, 0393-0404) dated 11/4/16 was sighted</p> <p>Soil analysis was conducted on 17/10/16 by UTCL Laboratory. The soil analysis reports (SI/1610/0288-0295, 0300-0303 dated 27/10/16) was sighted.</p> <p><u>REM Estate</u></p> <p>Foliar analysis was conducted on 27/1/16 and the samples were sent to UTCL Laboratory for tested. The foliar analysis report (L1/1601/REM/0021-0035, 0042-0062, 0094-0095) dated 28/1/16 was sighted.</p> <p>Soil analysis was conducted on 26/1-1/2/15 by UTCL Laboratory. The soil analysis reports (SI/1501/0013-0020 dated 3/2/15) was sighted.</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. - Minor compliance -</p>	<p>POME and composting were applied as per agricultural manual:</p> <ol style="list-style-type: none"> 1. D05: EFB Utilization at rate 50mt/ha. 2. D06:POME Utilization using tractor tanker and furrow system at 17mt/ha or 125kg/palm 3. D08: Biocompost application at the rate of 7mt/ha or 50kg/palm on selected area. <table border="1" data-bbox="660 1397 1273 1552"> <thead> <tr> <th>Date</th> <th>Tonnage</th> <th>Type</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>28/11/16</td> <td>69.99 mt</td> <td>compost</td> <td rowspan="2">SE</td> </tr> <tr> <td>1-29/11/16</td> <td>43,895.53 mt</td> <td>POME</td> </tr> <tr> <td>23/11/16</td> <td>12.47 mt</td> <td>EFB</td> <td rowspan="2">REM Est</td> </tr> <tr> <td>21/6/16</td> <td>23.45 mt</td> <td>Compost</td> </tr> </tbody> </table>	Date	Tonnage	Type	Estate	28/11/16	69.99 mt	compost	SE	1-29/11/16	43,895.53 mt	POME	23/11/16	12.47 mt	EFB	REM Est	21/6/16	23.45 mt	Compost	<p>Complied</p>
Date	Tonnage	Type	Estate																	
28/11/16	69.99 mt	compost	SE																	
1-29/11/16	43,895.53 mt	POME																		
23/11/16	12.47 mt	EFB	REM Est																	
21/6/16	23.45 mt	Compost																		
<p>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</p>																				

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator		Assessment Findings	Compliance																						
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Soil series map available for both estates visited. No other soil categorised as problematic or fragile soil. Sighted the type of soil available at SE and REM Estate. <table border="1"> <thead> <tr> <th>No.</th> <th>Type of Soil</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kompleks Aluvium Sungai</td> </tr> <tr> <td>2</td> <td>Siri Rengam</td> </tr> <tr> <td>3</td> <td>Siri Batu Lapan</td> </tr> <tr> <td>4</td> <td>Siri Bungor</td> </tr> <tr> <td>5</td> <td>Siri Gong Chenak</td> </tr> <tr> <td>6</td> <td>Siri Jelutong</td> </tr> <tr> <td>7</td> <td>Siri Padang Besar</td> </tr> <tr> <td>8</td> <td>Siri Tok Yong</td> </tr> <tr> <td>9</td> <td>Siri Tai Tak</td> </tr> <tr> <td>10</td> <td>Siri Tebok</td> </tr> </tbody> </table>	No.	Type of Soil	1	Kompleks Aluvium Sungai	2	Siri Rengam	3	Siri Batu Lapan	4	Siri Bungor	5	Siri Gong Chenak	6	Siri Jelutong	7	Siri Padang Besar	8	Siri Tok Yong	9	Siri Tai Tak	10	Siri Tebok	Complied
No.	Type of Soil																								
1	Kompleks Aluvium Sungai																								
2	Siri Rengam																								
3	Siri Batu Lapan																								
4	Siri Bungor																								
5	Siri Gong Chenak																								
6	Siri Jelutong																								
7	Siri Padang Besar																								
8	Siri Tok Yong																								
9	Siri Tai Tak																								
10	Siri Tebok																								
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 -	Recently immature area, the establishment of legume cover crop is well established. Field inspection showed groundcover with soft grass and soft weeds and planting of guatemala grass. There is no significant erosion risk was noted during the field visit. Terracing has been constructed to reduce the soil erosion. There are no peat soils or soil categorised as problematic or fragile soil at both estates.	Complied																						
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Estates has implemented annual road maintenance programme. Example of programme checked at both Estate shows the map indicating road repairs and maintenance for the whole estate roads including probase road maintenance.	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.	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.	Complied																						
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.	Complied																						
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.																									

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance												
<p>4.4.1</p> <p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>Sindora Operating units monitor water quality of outgoing waters to identify any adverse effect from the mill and estate activities. There is an Integrated Water Management Plan which has been implemented. The plan takes into account the efficient use of resources, ensure amongst other that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent. The sampling analysis has been conducted for both outgoing water and drinking water. Drinking water sampling was done for raw & treated water quality. Sampled records of upstream and downstream water analysis by UTCL Laboratory on 9/10/2015; report # WI/1610/0840-0842 & WI/1609/0720-0722.</p> <p>The mill has maintained monitoring records of water usage which recorded every day and summarised on monthly basis including the monitoring of rainfall water, which has been an alternative source of water as mitigation plan during draught season.</p> <p>For Sindora Estate, the sampling analysis has been conducted for incoming/outgoing. Sampled records of incoming/outgoing water analysis taken by UTCL Laboratory on 24/10/16; report # WI/1611/0873-0875; dated 2/11/16. The results have shown no significant changes on the BOD, COD, total dissolved solid, nitrate nitrogen and phosphorus on the downstream as compared to the upstream result.</p> <p>For REM Estate, the sampling analysis has been conducted for incoming/outgoing. Sampled records of incoming/outgoing water analysis taken by UTCL Laboratory on 18/1/16; report # WI/1602/0070-0071; dated 10/2/16. The results have shown no significant changes on the BOD, COD, total dissolved solid, nitrate nitrogen and phosphorus on the downstream as compared to the upstream result.</p>	<p>Complied</p>												
<p>4.4.2</p> <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. - Major compliance -</p>	<p>Agricultural Manual-A17: Protection of Natural water Courses, dated 1/7/13 established and describe as following:</p> <table border="1" data-bbox="660 1518 1299 1697"> <thead> <tr> <th>River width</th> <th>Reserve Area on Each Side</th> </tr> </thead> <tbody> <tr> <td>< 5 meter</td> <td>2.5 meter</td> </tr> <tr> <td>5-10 meter</td> <td>5 meter</td> </tr> <tr> <td>10-20 meter</td> <td>10 meter</td> </tr> <tr> <td>20-40 meter</td> <td>20 meter</td> </tr> <tr> <td>> 40 meter</td> <td>25 meter</td> </tr> </tbody> </table> <p>During site visit at P16A, the management maintained the buffer zone in accordance with the Agriculture Manual.</p>	River width	Reserve Area on Each Side	< 5 meter	2.5 meter	5-10 meter	5 meter	10-20 meter	10 meter	20-40 meter	20 meter	> 40 meter	25 meter	<p>Complied</p>
River width	Reserve Area on Each Side													
< 5 meter	2.5 meter													
5-10 meter	5 meter													
10-20 meter	10 meter													
20-40 meter	20 meter													
> 40 meter	25 meter													

**RSPO Public Summary Report
Revision 4 (November /2016)**

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 -	At Sindora POM, effluent monitoring has been carried out as below: a. Effluent BOD monitoring 2016 (final discharge). i.e.: Sep: 17 mg/L, Oct: 41 mg/L; Nov: 28 mg/L; (by UTCL Laboratory) The effluent monitoring was conducted by UTCL Laboratory, samples taken from mixing pond, bio-compost, bio-pac, interceptor, monsoon drain and POME Slurry. The monitoring conducted on monthly basics. It also according to the requirements of Department of Environment.	Complied																
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	SPOM monitored its water consumption on monthly basis for the source of water supply for its mill process usage. <table border="1"> <thead> <tr> <th>Year</th> <th>Water consumed</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>1.32 m³</td> </tr> <tr> <td>Todate 2016</td> <td>1.36 m³</td> </tr> </tbody> </table>	Year	Water consumed	2015	1.32 m ³	Todate 2016	1.36 m ³	Complied										
Year	Water consumed																		
2015	1.32 m ³																		
Todate 2016	1.36 m ³																		
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.																			
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	IPM Manual includes the planting of beneficial plants and control of damage by rodents, leaf-eaters, orytes and natural enemies. Beneficial plants such as Turnera subulata, Antigonon leptopus and Cassia cobanensis are grown in the estates. Records of planting of new areas and maintenance of existing areas of beneficial plants, location maps and barn owl census are available. <table border="1"> <thead> <tr> <th></th> <th>Distance</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Beneficial Plant</td> <td>151 chain</td> <td>SE</td> </tr> <tr> <td>20 mtr</td> <td>REM Est</td> </tr> </tbody> </table> The occupancy rate for Barn owl box on Oct 2016. <table border="1"> <thead> <tr> <th></th> <th>Occupancy rate</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Barn owl</td> <td>52 %</td> <td>SE</td> </tr> <tr> <td>23 %</td> <td>REM Est</td> </tr> </tbody> </table>		Distance	Estate	Beneficial Plant	151 chain	SE	20 mtr	REM Est		Occupancy rate	Estate	Barn owl	52 %	SE	23 %	REM Est	Complied
	Distance	Estate																	
Beneficial Plant	151 chain	SE																	
	20 mtr	REM Est																	
	Occupancy rate	Estate																	
Barn owl	52 %	SE																	
	23 %	REM Est																	
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Training records for staff and workers on IPM implementation were available and verified to be satisfactory during on-site assessment. <table border="1"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1/2/16</td> <td>IPM-Rat</td> <td>Staff</td> <td>SE</td> </tr> <tr> <td>22/6/16</td> <td>IPM-Bagworm</td> <td>Ast Mgr</td> <td>REM Est</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Estate	1/2/16	IPM-Rat	Staff	SE	22/6/16	IPM-Bagworm	Ast Mgr	REM Est	Complied				
Date	Training Topic	Trainer	Estate																
1/2/16	IPM-Rat	Staff	SE																
22/6/16	IPM-Bagworm	Ast Mgr	REM Est																
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment																			

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance															
4.6.1 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. - Major compliance -	Justification of pesticides applied is available in the agriculture manual. Refer to agriculture manual 21/10/2015, H01: Justification of Chemical Use. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species.	Complied															
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 -	Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained. <table border="1" data-bbox="659 734 1297 880"> <thead> <tr> <th></th> <th>2015</th> <th>Todate 2016</th> </tr> </thead> <tbody> <tr> <td>SE</td> <td>1.68 % a.i/ha</td> <td>1.94 % a.i/ha</td> </tr> <tr> <td>REM Est</td> <td>1.98 % a.i/ha</td> <td>2.19 % a.i/ha</td> </tr> </tbody> </table>		2015	Todate 2016	SE	1.68 % a.i/ha	1.94 % a.i/ha	REM Est	1.98 % a.i/ha	2.19 % a.i/ha	Complied						
	2015	Todate 2016															
SE	1.68 % a.i/ha	1.94 % a.i/ha															
REM Est	1.98 % a.i/ha	2.19 % a.i/ha															
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 -	The quantity of agrochemicals required for various field conditions are documented and justified in Kulim's Agriculture Manual. The implementation in the field is consistent with the manual. There is no prophylactic use of pesticides.	Complied															
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 -	Kulim (M) Bhd has stopped paraquat usage since February 2015. Alternatives such as Glyphosate were used.	Complied															
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 -	Training for both estates was conducted accordingly. <table border="1" data-bbox="659 1518 1297 1697"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1/2/16</td> <td>IPM-Rat</td> <td>Staff</td> <td rowspan="2">Sindora Estate</td> </tr> <tr> <td>1/2/16</td> <td>Spraying</td> <td>Staff</td> </tr> <tr> <td>22/6/16</td> <td>IPM-Bagworm</td> <td>Ast Mgr</td> <td>REM Estate</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	1/2/16	IPM-Rat	Staff	Sindora Estate	1/2/16	Spraying	Staff	22/6/16	IPM-Bagworm	Ast Mgr	REM Estate	Complied
Date	Training Topic	Trainer	Remarks														
1/2/16	IPM-Rat	Staff	Sindora Estate														
1/2/16	Spraying	Staff															
22/6/16	IPM-Bagworm	Ast Mgr	REM Estate														
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 -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.	Complied															

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance																				
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 Agriculture Manual, Section I: Weeds Management. The implementation in the field is consistent with the Agriculture Manual.	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 aerial spraying at all estates.	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 -	There is no associated smallholder at Sindora Certification Unit. Training for both estates was conducted accordingly. <table border="1"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1/2/16</td> <td>IPM-Rat</td> <td>Staff</td> <td>SE</td> </tr> <tr> <td>1/2/16</td> <td>Spraying</td> <td>Staff</td> <td>SE</td> </tr> <tr> <td>22/6/16</td> <td>IPM-Bagworm</td> <td>Ast Mgr</td> <td>REM Est</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	1/2/16	IPM-Rat	Staff	SE	1/2/16	Spraying	Staff	SE	22/6/16	IPM-Bagworm	Ast Mgr	REM Est	Complied				
Date	Training Topic	Trainer	Remarks																			
1/2/16	IPM-Rat	Staff	SE																			
1/2/16	Spraying	Staff	SE																			
22/6/16	IPM-Bagworm	Ast Mgr	REM Est																			
4.6.10 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 -	The management dispose the empty containers per scheduled waste regulation.	Complied																				
4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	Annual medical surveillance for sprayers and pesticide operators were demonstrated. Medical examination programme established for 1 group of sprayer team which conducted by Kulim Safety Training and Services Sdn Bhd-HQ/14/DOC/00/367-BP Diagnostic Centre Sdn Bhd. <table border="1"> <thead> <tr> <th>ID No</th> <th>Date of Medical check up</th> <th>Result</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>AD2344228</td> <td rowspan="3">19/5/16</td> <td>Fit to work</td> <td rowspan="3">SE</td> </tr> <tr> <td>AT452039</td> <td>Fit to work</td> </tr> <tr> <td>AR407832</td> <td>Fit to work</td> </tr> <tr> <td>A3424945</td> <td rowspan="3">9/10/16</td> <td>Fit to work</td> <td rowspan="3">REM Est</td> </tr> <tr> <td>AT305700</td> <td>Fit to work</td> </tr> <tr> <td>AS103802</td> <td>Fit to work</td> </tr> </tbody> </table>	ID No	Date of Medical check up	Result	Estate	AD2344228	19/5/16	Fit to work	SE	AT452039	Fit to work	AR407832	Fit to work	A3424945	9/10/16	Fit to work	REM Est	AT305700	Fit to work	AS103802	Fit to work	Complied
ID No	Date of Medical check up	Result	Estate																			
AD2344228	19/5/16	Fit to work	SE																			
AT452039		Fit to work																				
AR407832		Fit to work																				
A3424945	9/10/16	Fit to work	REM Est																			
AT305700		Fit to work																				
AS103802		Fit to work																				
4.6.12 No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	At Sindora Estate and REM Estate, there are no female sprayers.	Complied																				

Criterion 4.7:

An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:

**RSPO Public Summary Report
Revision 4 (November /2016)**

<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>Occupational Safety and Health Policy was established which has been signed by Managing Director of Kulim Malaysia Berhad dated 1/1/2008.</p> <p>OHS plan for 2016 dated 2/1/2016 has been established. The OHS plan comprises of OSH legal compliance, emergency response plan (ERP), OSH management system, risk management and safety committee activities. Sample of OSH management system activities as follows :</p> <p><u>i) Chemical Health Risk Assessment (CHRA)</u> CHRA was conducted on 10/1/2013 by QMSPRO Training & Consultancy (JKKP HIE 127/171-2(154) for SPOM. The action plan for 2016 was established through the recommendation from the assessor.</p> <p>CHRA was conducted on 10/1/2013 by QMSPRO Training & Consultancy (JKKP HIE 127/171-2(154) for SE. The action plan was established through the recommendation from the assessor. The action plan, dated: 4/9/16 was established through the recommendation from the assessor.</p> <p>CHRA was conducted in 4/2/2013 by QMSPRO Training & Consultancy (JKKP HIE 127/171-2(154) for REM Estate. The action plan for 2016 was established through the recommendation from the assessor.</p> <p><u>ii) Chemical Exposure Monitoring</u> The CEM was conducted on 26/5/16 by Kulim Safety Training and Services Sdn Bhd, JKKP HIE 127/171-3/1(164)- Report No:CEM/1605/012.The results showing that all operators' exposure level of n-hexane was below the PEL.</p> <p><u>iii) Medical Surveillance</u> 4 workers were sent on 18/11/2016 and 8 workers on 19/5/16 for medical surveillance for those who are involved with chemical, refer to medical surveillance report by registered OHD, HQ/14/DOC/00/367 under BP Healthcare Group. All the operators were found normal.</p> <p><u>iv) Audiometric Testing</u> Audiometric testing was conducted on 22/5/16 by Industrial Safety Management Services. Total workers tested 41. Only 1 worker we found with standard threshold shift. Received report 26/9/16. No retest was conducted because of late receiving of report. 1. 790827016107 (Boilerman) - Refer to NCR Indicator 2.1.1</p> <p><u>v) LEV inspection</u> Local Exhaust Ventilation (LEV) Examination was conducted on 3/10/16 by Kulim Safety Training and Services Sdn Bhd (JKKP HIE 127/171-3/2(210). However, the assessor recommended to improve the performance of LEV with proper design. The action plan was established to capture all the recommendation by the assessor.</p>	<p>Complied</p>
--------------	--	---	-----------------

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance																																																																						
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 -	HIRARC for all activities was assessed which was based on Risk Assessment Criteria stated in the procedure (SOP) Hazard Identification, Risk Assessment and Risk Control, dated 20/11/2009- Kulim (M) Bad. Eg: Weighbridge, Loading Ramp, Sterilizer, Threshing Station, Pressing Station, Clarification, Nut Cracking Station, Kernel Plant, Kernel Storage, CPO Storage, Boiler Station, Engine room, workshop, General-cleaning and others, Store, EFB Press, Laboratory, WTP, Sterilizer, Landfill, Manuring, Chemical mixing, spraying, trunk injection, harvesting, road maintenance, pruning, FFB transport, confined space, construction of boiler, construction of biogas plant, nursery, FFB evacuation using MB, bio-composting plant, replanting and etc.	Complied																																																																						
4.7.3 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 -	Training Scheduled for 2016 was established. Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Suitable PPE has been provided to the workers based on the information in the MSDS/CSDS and CHRA assessor's recommendation. <table border="1" data-bbox="660 1055 1273 1895"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>30/10/16</td> <td>Handling Tractor</td> <td>Ast Mgr</td> <td rowspan="10">SPOM</td> </tr> <tr> <td>8-9/8/16</td> <td>First Aid/CPR</td> <td>BSMM</td> </tr> <tr> <td>19/5/16</td> <td>PPE</td> <td>Ast Mgr</td> </tr> <tr> <td>20/4/16</td> <td>Confined Space</td> <td>Ast Mgr</td> </tr> <tr> <td>10/4/16</td> <td>Fire Drill</td> <td>Mgr</td> </tr> <tr> <td>1/3/16</td> <td>Press & Oil Room-SOP</td> <td>Ast Mgr</td> </tr> <tr> <td>9/3/16</td> <td>Sterilizer-SOP</td> <td>Ast Mgr</td> </tr> <tr> <td>1/2/16</td> <td>IPM-Rat</td> <td>Staff</td> </tr> <tr> <td>1/2/16</td> <td>Spraying</td> <td>Staff</td> </tr> <tr> <td>10/2/16</td> <td>Chemical handling</td> <td>Ast Mgr</td> </tr> <tr> <td>13/4/16</td> <td>Workshop</td> <td>Staff</td> <td rowspan="10">SE</td> </tr> <tr> <td>15/2/16</td> <td>Harvesting</td> <td>Ast Mgr</td> </tr> <tr> <td>12/4/16</td> <td>EFB/Compost</td> <td>Ast Mgr</td> </tr> <tr> <td>21/7/16</td> <td>Fire Drill</td> <td>Mgr</td> </tr> <tr> <td>18/7/16</td> <td>Harvesting</td> <td>Mgr</td> </tr> <tr> <td>16/6/16</td> <td>Grass cutting</td> <td>Ast Mgr</td> </tr> <tr> <td>10/6/16</td> <td>Manuring</td> <td>Mgr</td> </tr> <tr> <td>8/6/16</td> <td>Weighbridge</td> <td>Ast Mgr</td> </tr> <tr> <td>12/5/16</td> <td>Chemical Mixing</td> <td>Ast Mgr</td> </tr> <tr> <td>26/5/16</td> <td>P&D</td> <td>Ast Mgr</td> </tr> <tr> <td>12/5/16</td> <td>Diesel Handling</td> <td>Ast Mgr</td> <td>REM Est</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	30/10/16	Handling Tractor	Ast Mgr	SPOM	8-9/8/16	First Aid/CPR	BSMM	19/5/16	PPE	Ast Mgr	20/4/16	Confined Space	Ast Mgr	10/4/16	Fire Drill	Mgr	1/3/16	Press & Oil Room-SOP	Ast Mgr	9/3/16	Sterilizer-SOP	Ast Mgr	1/2/16	IPM-Rat	Staff	1/2/16	Spraying	Staff	10/2/16	Chemical handling	Ast Mgr	13/4/16	Workshop	Staff	SE	15/2/16	Harvesting	Ast Mgr	12/4/16	EFB/Compost	Ast Mgr	21/7/16	Fire Drill	Mgr	18/7/16	Harvesting	Mgr	16/6/16	Grass cutting	Ast Mgr	10/6/16	Manuring	Mgr	8/6/16	Weighbridge	Ast Mgr	12/5/16	Chemical Mixing	Ast Mgr	26/5/16	P&D	Ast Mgr	12/5/16	Diesel Handling	Ast Mgr	REM Est	Complied
Date	Training Topic	Trainer	Remarks																																																																					
30/10/16	Handling Tractor	Ast Mgr	SPOM																																																																					
8-9/8/16	First Aid/CPR	BSMM																																																																						
19/5/16	PPE	Ast Mgr																																																																						
20/4/16	Confined Space	Ast Mgr																																																																						
10/4/16	Fire Drill	Mgr																																																																						
1/3/16	Press & Oil Room-SOP	Ast Mgr																																																																						
9/3/16	Sterilizer-SOP	Ast Mgr																																																																						
1/2/16	IPM-Rat	Staff																																																																						
1/2/16	Spraying	Staff																																																																						
10/2/16	Chemical handling	Ast Mgr																																																																						
13/4/16	Workshop	Staff	SE																																																																					
15/2/16	Harvesting	Ast Mgr																																																																						
12/4/16	EFB/Compost	Ast Mgr																																																																						
21/7/16	Fire Drill	Mgr																																																																						
18/7/16	Harvesting	Mgr																																																																						
16/6/16	Grass cutting	Ast Mgr																																																																						
10/6/16	Manuring	Mgr																																																																						
8/6/16	Weighbridge	Ast Mgr																																																																						
12/5/16	Chemical Mixing	Ast Mgr																																																																						
26/5/16	P&D	Ast Mgr																																																																						
12/5/16	Diesel Handling	Ast Mgr	REM Est																																																																					

**RSP0 Public Summary Report
Revision 4 (November /2016)**

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. - Major compliance -</p>	<p>OSH Committees meeting conducted quarterly and meeting minutes includes issues raised and action taken form workplace inspection report etc. The discussion on the accident review, workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. There was no major issue.</p> <p><u>Sindora Palm Oil Mill</u> SHC organization chart for 2016 i) Chairman – Rosfazihan Baharoom (Mill Manager) ii) Secretary – Nazariah Bt Mohamed Ariffin (#3: 30/6/16, #2: 28/3/16, #1: 4/3/16)</p> <p><u>Sindora Estate</u> SHC organization chart for 2016 i) Chairman – Ahmad Fauzi Hj Nordin (Estate Manager) ii) Secretary – Azli Hj Othman (#3: 30/9/16, #2: 28/6/16, #1: 25/3/16)</p> <p><u>REM Estate</u> SHC organization chart for 2016 i) Chairman – Hafiz B. Abd Kadir (Estate Manager) ii) Secretary – Zuhaidi B. Ghazali (#18/11/16, #3: 21/8/16, #2: 26/5/16, #1: 26/2/16)</p>	<p>Complied</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<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>Accident and emergency procedures have been communicated to employees, contractors and visitors. Fire evacuation drill was last conducted on 10/4/16 to test the state of readiness during emergency situation. Workers trained in First Aider were present in the mill and field operations.</p> <p>However, the inventories for first aid boxes at the Sindora Estate were insufficient.</p> <ol style="list-style-type: none"> 1. Harvesting at P08/1 2. Spraying at P10/5 3. Manuring P15A <p>Thus, minor NCR was raised.</p> <p>Records on all accidents kept and summary sent to Head Office. Quarterly review on accident cases carried out during OSH quarterly meeting. All operating units keeping all the JKKP 6 & 8 forms and available for viewing. Sighted some records of accidents :</p> <p><u>SPOM</u> 10/4/16-Accident at Threshing Station (MC 38 days), and Accident report was prepared on 19/4/16 by Ast. Mgr. JKKP 6 was send to DOSH on 13/7/16 by Ast. Mgr. JKKP 8 for 2015 was sent to DOSH on 13/1/2016.</p> <p><u>SE</u> No accident occurred for 2016. JKKP 8 for 2015 was sent to DOSH on 17/1/2016.</p> <p><u>REM Estate</u> 13/3/16-Accident at Harvesting (MC 38 days), and Accident report was prepared on 28/3/16 by Ast. Mgr. JKKP 6 was send to DOSH on 14/3/16 by Ast. Mgr. JKKP 8 for 2015 was sent to DOSH on 5/1/2016.</p>	<p>Minor nonconformance</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance																					
<p>4.7.6 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. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme.</p> <table border="1" data-bbox="660 477 1297 976"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>MSIG Insurance (M) Bhd. (JB-09580676-FWC)</td> <td>8/6/16 – 7/6/17</td> <td>SPOM</td> </tr> <tr> <td>SOCSCO</td> <td>Oct16, Sept 16</td> <td></td> </tr> <tr> <td>Berjaya Sampo Insurance Berhad (16DJBEWWCZO 0849)</td> <td>5/7/16 – 4/7/17</td> <td>SE</td> </tr> <tr> <td>SOCSCO</td> <td>Oct16, Sept 16</td> <td></td> </tr> <tr> <td>Berjaya Sampo Insurance Berhad (16DJBEWWCZO 0050)</td> <td>6/1/17 – 5/1/17</td> <td>REM Est</td> </tr> <tr> <td>SOCSCO</td> <td>Oct16, Sept 16</td> <td></td> </tr> </tbody> </table> <p>However, at Sindora Estate, 3 contract workers' from TBK Plantation Works were found not covered by accident insurance (foreign workers compensation scheme):</p> <ol style="list-style-type: none"> 1. B2359522 2. AS011362 3. A7959982 <p>Thus, minor NCR was raised.</p>	Insurance	Period	Remark	MSIG Insurance (M) Bhd. (JB-09580676-FWC)	8/6/16 – 7/6/17	SPOM	SOCSCO	Oct16, Sept 16		Berjaya Sampo Insurance Berhad (16DJBEWWCZO 0849)	5/7/16 – 4/7/17	SE	SOCSCO	Oct16, Sept 16		Berjaya Sampo Insurance Berhad (16DJBEWWCZO 0050)	6/1/17 – 5/1/17	REM Est	SOCSCO	Oct16, Sept 16		<p>Minor nonconformance</p>
Insurance	Period	Remark																					
MSIG Insurance (M) Bhd. (JB-09580676-FWC)	8/6/16 – 7/6/17	SPOM																					
SOCSCO	Oct16, Sept 16																						
Berjaya Sampo Insurance Berhad (16DJBEWWCZO 0849)	5/7/16 – 4/7/17	SE																					
SOCSCO	Oct16, Sept 16																						
Berjaya Sampo Insurance Berhad (16DJBEWWCZO 0050)	6/1/17 – 5/1/17	REM Est																					
SOCSCO	Oct16, Sept 16																						
<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -</p>	<p>Records on Lost Time Accident (LTA) metrics was maintained and based on JKPP 6, 7 & 8. Sample of accident statistic as shown below :</p> <table border="1" data-bbox="660 1339 1082 1462"> <thead> <tr> <th>Year</th> <th>SPOM</th> <th>SE</th> <th>RE</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>143</td> <td>40</td> <td>146</td> </tr> <tr> <td>2016 (as at Oct 16)</td> <td>58</td> <td>0</td> <td>78</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days</p>	Year	SPOM	SE	RE	2015	143	40	146	2016 (as at Oct 16)	58	0	78	<p>Complied</p>									
Year	SPOM	SE	RE																				
2015	143	40	146																				
2016 (as at Oct 16)	58	0	78																				

Criterion 4.8:

All staff, workers, smallholders and contract workers are appropriately trained.

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance																																																																									
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. - Major compliance -	Training Scheduled for 2016 was established. Awareness and training programme that covers all aspects of the RSPO had been carried out: <table border="1" data-bbox="659 495 1273 1361"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>30/10/16</td> <td>Handling Tractor</td> <td>Ast Mgr</td> <td rowspan="10">SPOM</td> </tr> <tr> <td>8-9/8/16</td> <td>First Aid/CPR</td> <td>BSMM</td> </tr> <tr> <td>19/5/16</td> <td>PPE</td> <td>Ast Mgr</td> </tr> <tr> <td>20/4/16</td> <td>Confined Space</td> <td>Ast Mgr</td> </tr> <tr> <td>10/4/16</td> <td>Fire Drill</td> <td>Mgr</td> </tr> <tr> <td>1/3/16</td> <td>Press & Oil Room-SOP</td> <td>Ast Mgr</td> </tr> <tr> <td>9/3/16</td> <td>Sterilizer-SOP</td> <td>Ast Mgr</td> </tr> <tr> <td>1/2/16</td> <td>IPM-Rat</td> <td>Staff</td> <td rowspan="4">SE</td> </tr> <tr> <td>1/2/16</td> <td>Spraying</td> <td>Staff</td> </tr> <tr> <td>10/2/16</td> <td>Chemical handling</td> <td>Ast Mgr</td> </tr> <tr> <td>13/4/16</td> <td>Workshop</td> <td>Staff</td> </tr> <tr> <td>15/2/16</td> <td>Harvesting</td> <td>Ast Mgr</td> <td rowspan="10">REM Est</td> </tr> <tr> <td>12/4/16</td> <td>EFB/Compost</td> <td>Ast Mgr</td> </tr> <tr> <td>2/5/16</td> <td>S/Waste</td> <td>Ast Mgr</td> </tr> <tr> <td>21/7/16</td> <td>Fire Drill</td> <td>Mgr</td> </tr> <tr> <td>18/7/16</td> <td>Harvesting</td> <td>Mgr</td> </tr> <tr> <td>16/6/16</td> <td>Grass cutting</td> <td>Ast Mgr</td> </tr> <tr> <td>10/6/16</td> <td>Manuring</td> <td>Mgr</td> </tr> <tr> <td>8/6/16</td> <td>Weighbridge</td> <td>Ast Mgr</td> </tr> <tr> <td>12/5/16</td> <td>Chemical Mixing</td> <td>Ast Mgr</td> </tr> <tr> <td>26/5/16</td> <td>P&D</td> <td>Ast Mgr</td> </tr> <tr> <td>12/5/16</td> <td>Diesel Handling</td> <td>Ast Mgr</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	30/10/16	Handling Tractor	Ast Mgr	SPOM	8-9/8/16	First Aid/CPR	BSMM	19/5/16	PPE	Ast Mgr	20/4/16	Confined Space	Ast Mgr	10/4/16	Fire Drill	Mgr	1/3/16	Press & Oil Room-SOP	Ast Mgr	9/3/16	Sterilizer-SOP	Ast Mgr	1/2/16	IPM-Rat	Staff	SE	1/2/16	Spraying	Staff	10/2/16	Chemical handling	Ast Mgr	13/4/16	Workshop	Staff	15/2/16	Harvesting	Ast Mgr	REM Est	12/4/16	EFB/Compost	Ast Mgr	2/5/16	S/Waste	Ast Mgr	21/7/16	Fire Drill	Mgr	18/7/16	Harvesting	Mgr	16/6/16	Grass cutting	Ast Mgr	10/6/16	Manuring	Mgr	8/6/16	Weighbridge	Ast Mgr	12/5/16	Chemical Mixing	Ast Mgr	26/5/16	P&D	Ast Mgr	12/5/16	Diesel Handling	Ast Mgr	Complied
Date	Training Topic	Trainer	Remarks																																																																								
30/10/16	Handling Tractor	Ast Mgr	SPOM																																																																								
8-9/8/16	First Aid/CPR	BSMM																																																																									
19/5/16	PPE	Ast Mgr																																																																									
20/4/16	Confined Space	Ast Mgr																																																																									
10/4/16	Fire Drill	Mgr																																																																									
1/3/16	Press & Oil Room-SOP	Ast Mgr																																																																									
9/3/16	Sterilizer-SOP	Ast Mgr																																																																									
1/2/16	IPM-Rat	Staff		SE																																																																							
1/2/16	Spraying	Staff																																																																									
10/2/16	Chemical handling	Ast Mgr																																																																									
13/4/16	Workshop	Staff																																																																									
15/2/16	Harvesting	Ast Mgr	REM Est																																																																								
12/4/16	EFB/Compost	Ast Mgr																																																																									
2/5/16	S/Waste	Ast Mgr																																																																									
21/7/16	Fire Drill	Mgr																																																																									
18/7/16	Harvesting	Mgr																																																																									
16/6/16	Grass cutting	Ast Mgr																																																																									
10/6/16	Manuring	Mgr																																																																									
8/6/16	Weighbridge	Ast Mgr																																																																									
12/5/16	Chemical Mixing	Ast Mgr																																																																									
26/5/16	P&D	Ast Mgr																																																																									
12/5/16	Diesel Handling	Ast Mgr																																																																									
4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	All records of training were available at mill and estates office.	Complied																																																																									

Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

Criterion 5.1:

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.

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.1</p> <p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p>In Sindora POM, Documented Environmental Aspects and Impacts Register (Form No.: EPA-SINPOM-2016; Activity code: ER001- ER019; Rev. 6/2016) available. Total 21 list of activities are identified in POM. As for the review process, the annual review of the EIA management review meeting and review if any new activities in POM, changes of legislation and environmental issue raise by stakeholders.</p> <p>Similar Documented Environmental Aspects and Impacts Register were sighted in other estate as well. For example, in Sindora estate, in total 12 activities were identified including cattle grazing and nursery have been identified in the environmental risk assessment form (LS-EMS-EA-F01; Revision: 2 August 2016). In R.E.M estate, total 13 activities have been documented (EPA-REM PASAK-2016).</p>	<p>Complied</p>
<p>5.1.2</p> <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. - Minor compliance -</p>	<p>In Sindora POM, environmental management plan with aspect/impact identification, risk assessment and risk control for different activity and area. For example, mitigation plan or records sighted such as:</p> <ul style="list-style-type: none"> a. Schedule Waste disposal record and eSWIS (online reporting system) b. Stack Monitoring according DOE requirement conducted on December 2015 and April 2016. c. Ambient Air Monitoring according DOE requirement conducted on January, May and July 2016 by Spectrum Laboratories (Johore) Sdn Bhd d. Effluent BOD monitoring 2016 (final discharge). i.e.: Sep: 17 mg/L, Oct: 41 mg/L; Nov: 28 mg/L; (by UTCL Laboratory) e. Mengkibol River water quality monitoring; upstream for downstream month Nov (No:WI/1611/0959-0962), Oct (WI/1610/0843-0846) and Sep (WI/1609/0713-0716) f. Noise monitoring conducted on 25 Oct 2016 <p>Environmental management plan updated in year 2016 made available for estates during site visit. In R.E.M estate, the management plan (EPA-REM PASAK-2016) such as update monthly record of waste collection, weekly inspection of compound and weekly inspection of domestic rubbish collection. Similar environmental management plan sighted in other estates.</p> <p>The responsible person are Manager, Assistant Manager, staff in charge of line-site and Estate HA. It depends on the activities and area.</p>	<p>Complied</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.3</p> <p>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.</p> <p>- Minor compliance -</p>	<p>An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts.</p> <p>Continuous awareness training programme has been carried out by the company to its workers and other stakeholders.</p>	<p>Complied</p>
<p>Criterion 5.2: 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 operations managed to best ensure that they are maintained and/or enhanced.</p>		
<p>5.2.1</p> <p>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).</p> <p>- Major compliance -</p>	<p>Information in High Conservation Value (HCV) assessment includes both the planted area itself and relevant wider landscape-level with considerations of surrounding areas. Initial HCV assessment conducted in 2007 by external consultant is reviewed annually to ensure management and monitoring plans are relevant and conducted.</p> <p>In April 2016, another HCV Assessment was conducted by Malaysia Environmental Consultant Sdn Bhd. Both lead assessor were ALS licensed assessor (ALS14023KL; ALS15035TN). Within the Sindora estate, following HCV were identified:</p> <ul style="list-style-type: none"> a. Biodiversity HCV 1 and HCV 2. The main concern is elephant using the forest inside and outside the estate. b. Biodiversity HCV 1. Wildlife corridor along Sg Sembrong c. Biodiversity HCV 3. Monitor species presence and maintain buffer with natural forest d. Stream management HCV 4. Natural bank vegetation should be allowed to regenerate e. Soil and nutrient conservation on hill slopes. HCV4 <p>The estate's boundary shares with the Kluang Forest Reserve, and the overlapping Gunung Belumut Wildlife Reserve. It also supports a viable subpopulation of the elephant.</p> <p>Within the Sindora estate, there is a forest reserve which is belong to BAKAJ (Water Regulatory Bodies Johore) connect between this foraging area and the rest of the Kluang Forest Reserve. It also serve as the wildlife corridor from east to west within the estate.</p> <p>In R.E.M estate, the HCV assessment conducted by A.J.F.M. Dekker in 2007. The estate surrounded by other oil palm plantation and residential area. The HCV identified within the estate only pond, river and swampy area.</p>	<p>Complied</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>5.2.2</p> <p>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 -</p>	<p>Based on the April 2016 HCV Assessment Report of Sindora Estate, total 77 species were recorded, two (2) are listed as critical (CR), three (3) endangered species (EN), two (2) vulnerable (VU) species, four (4) near threatened (NT) species. The remaining 66 species are classed as Least Concerned (LC).</p> <p>The management plan was developed based on recommendation of HCV assessment report. Action plan such as expand the narrowest section along the wildlife corridor. Total 2 narrowest section in blocks P87/01- 42 m and blocks P87/03- <40M has been expanded to total 160m and 200m respectively. During onsite visit, electric fences already removed from the connecting road to allow unhindered passage for elephants moving east-west along the river corridor.</p> <p>However, as suggest in the HCV assessment report table 6.1, activity such as review of HCV management capacity, planning, implementation and monitoring HCV Management at a group level did not carry out accordingly. Thus, the major NCR was raised.</p> <p>Other management plan such as animal sighting record, buffer zone establishment and erosion survey is the ongoing action plan. Similar program sighted in R.E.M. estate.</p>	<p>Major nonconformance</p>
<p>5.2.3</p> <p>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 -</p>	<p>Operating units have programme to regularly educate the workforce about the status of these RTE species. In Sindora estate, the briefing on the HCV conducted on 12 October 2016.</p> <p>There is evidence that the operating units continuously prevent and discourage illegal or hunting, fishing or collecting activities. Sign board as well as routine patrolling activities were utilised as part of creating awareness among employees and maintain HCVs.</p>	<p>Complied</p>
<p>5.2.4</p> <p>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 -</p>	<p>Management plan is incorporated with ongoing monitoring of the status of HCV and RTE species that are affected by plantation or mill operations and reported by the Kulim SPO Team from Head Office.</p> <p>Outcomes of monitoring are communicated with plantation management and with management plan. HCV monitoring of monthly record by SPO Department available and animal such as wild boar, snake and elephant was still sighted.</p>	<p>Complied</p>
<p>5.2.5</p> <p>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 -</p>	<p>There was no HCV set-aside that needs any negotiation process with the local communities.</p>	<p>Complied</p>

Criterion 5.3:

Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.1</p> <p>All waste products and sources of pollution shall be identified and documented. - Major compliance -</p>	<p>Visits made to Sindora POM together with Sindora Estate and REM & Pasak Estate showed that all waste products and sources of pollution were identified and documented.</p> <p>The documentation and identification of all the waste products based on waste type and source which review on January 2016.</p> <p>Waste types such as domestic, schedule waste, rubber material, scrap, mill by products, emissions, liquid waste, office and medical waste. 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.</p> <p>At the Mill. Scheduled Waste identified included spent hydraulic oil (SW 305), spent lubricant oil (SW 306), used chemical containers/drums (SW 409), used filters SW 410) and used batteries (SW 102). 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.</p>	<p>Complied</p>

**RSPO Public Summary Report
Revision 4 (November / 2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.2 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. e.g. for POM by Kualiti Alam Sdn Bhd and following disposal records were verified.</p> <ul style="list-style-type: none"> a. Consignment note (doc no: 0098857) dated 09 Sep 2016; SW410 b. Consignment note (doc no: 0090912) dated 31 March 2016; SW410 <p>In Sindora estate, disposal of schedule waste record as below:</p> <ul style="list-style-type: none"> a. Consignment note (doc no: 0099641) dated 25 Sep 2016; SW410 b. Consignment note (doc no: 0104751) dated 06 July 2016; SW404 <p>In R.E.M estate, disposal of schedule waste record as below:</p> <ul style="list-style-type: none"> a. Consignment note (doc no: 0098810) dated 25 Sep 2016; SW305 b. Consignment note (doc no: 0092030) dated 11 Mar 2016; SW305 <p>Agrochemical containers are triple rinsed and punctured to avoid any misuse. In R.E.M estate, the recycling contractor will come to collect the empty container. Collection receipt dated 10 Nov 2016 and collected by G Planter made available during onsite visit.</p>	<p>Complied</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>Waste & Pollution Management Plan which has incorporated waste type and source, action, frequency, records and responsibility. The plan was review on January 2016.</p> <p>Scheduled waste is managed well with designated storage area at the mill and each of the estates not to less than 180 days in accordance with the requirements of the Environmental Quality Act 1974 (Scheduled Wastes), Regulations, 2005. Disposal was through licensed collector.</p> <p>The company has continued managing scheduled waste stores at the mill and each of the estates. Agrochemical containers are triple rinsed and punctured to avoid any misuse. Latest review on type of waste generated and its handling management plan was done on January 2016.</p> <p>Schedule waste at the mill have been disposed through Kualiti Alam on 7 Aug 2016 (i.e.: Consignment note (doc no: 0098353). Inventory record was being maintained adequately.</p> <p>Visit to dumpsite which located at Sindora estate Block P06/01 and R.E.M Estate (P93 Block 2), it is far from residential area and waterways. Once the dump site full, it will close and fill with layer of soil. Similar dump site sighted in other plantations.</p>	<p>Complied</p>
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		
<p>5.4.1</p> <p>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>	<p>In the estate fossil fuel usage was monitored on monthly basics. Record from Jan till Oct 2016 sighted during onsite audit. The POM and estates monitor the use of fossil fuel/mt FFB:</p> <p>For example, the Sindora POM:</p> <ul style="list-style-type: none"> a. August- 0.43 l/MT FFB b. September- 0.34 l/MT FFB c. October- 0.35 l/MT FFB <p>In Sindora estate (with bio-compost plant)</p> <ul style="list-style-type: none"> a. August- 9.68 l/MT FFB b. September- 6.06 l/MT FFB c. October- 4.35 l/MT FFB <p>In R.E.M Estate, the diesel usage as below:</p> <ul style="list-style-type: none"> a. August- 2.44 l/MT FFB b. September- 1.68 l/MT FFB c. October- 2.09 l/MT FFB <p>The usage of diesel in estate use for vehicles and genset purpose. Average 12% of fibre used per month combining with 6% of shell as renewable energy source to feed in to the boiler.</p> <p>Sindora Palm Oil Mill is constructing biogas plant to collect and use biogas. It is expected going to delay from 2016 and complete by 2017 if the test run and commissioning is successful.</p>	<p>Complied</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 5.5: 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.			
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 -	Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law –EQA and Regulations 1974. Besides, in their Kulim Sustainability Handbook June 2007 also emphasize on zero burning technique for replanting. No open burning noted during the field and facility visit. For example, visited Sindora estate block P87/03 and R.E.M estate block P16 found no evidence of fire used for replanting.	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 -	No open burning noted during the field and facility visit	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	At Sindora POM, effluent, ambient air quality monitoring and air emission monitoring has been carried out as below: b. Stack Monitoring (Boiler No.3) according DOE requirement conducted on December 2015 and April 2016 by Spectrum Laboratories (Johore) Sdn Bhd c. Ambient Air Monitoring according DOE requirement conducted on January, May and July 2016 by Spectrum Laboratories (Johore) Sdn Bhd d. Effluent BOD monitoring 2016 (final discharge). i.e.: Sep: 17 mg/L, Oct: 41 mg/L; Nov: 28 mg/L; (by UTCL Laboratory) The result showed that the parameters checked were complied with the limit of the Malaysian Recommended Air Quality Guidelines and Environmental Quality (Clean Air) Regulation, 1978; Standard C limit. For effluent monitoring was conducted by UTCL Laboratory, samples taken from mixing pond, bio-compost, bio-pac, interceptor, monsoon drain and POME Slurry. The monitoring conducted on monthly basics. It also according to the requirements of Department of Environment. Based on the review result Management Action Plans are developed and implemented as part of continuous improvement. The review includes the gaseous emissions, particulates emission and effluent.	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance	
5.6.2	<p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.</p> <p>- Major compliance</p>	<p>Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH₄) emission through POME treatment. Other less significant GHG emissions identified including CO_x, SO_x and NO_x from various sources including fossil fuel, chemical and fertilizer consumptions.</p> <p>Sindora mill expected to complete the biogas plant commissioning by end of 2016 to capture methane gas and reduce the greenhouse gas emission.</p>	Complied
5.6.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Monitoring of the GHG quantity was done through RSPO approved calculator Palm GHG. Annual quantification of all GHG sources was input into the calculator. These calculations were done in HQ level where GHG calculations were done as per certification unit basics. In year 2015, total field (own crop) and mill emission is 25012.99 and 34256.49 (tCO_{2e}) respectively.</p>	Complied
<p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p>			
<p>Criterion 6.1: 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.</p>			
6.1.1	<p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>- Major compliance -</p>	<p>Sustainability team from head office of Kulim (M) Berhad has conducted Social Impact Assessment 2016 for the mill on 25/4/2016 and 29/4/2016 for REM Estate. The report was developed on 5/10/2016. The assessment was conducted by interviewing with the relevant stakeholders such as workers, woman’s representative, Union representative, school and etc.</p> <p>Malaysian Environmental Consultants Sdn. Bhd. has conducted SIA for Sindora Estate on 25-27/4/2016. The assessment was conducted based on field visit and interview with stakeholders. The stakeholders were interviewed on the issue related to social such as housing, water and sanitation, education, medical facilities and safety.</p>	Complied
6.1.2	<p>There shall be evidence that the assessment has been done with the participation of affected parties.</p> <p>- Major compliance -</p>	<p>The assessment was carried out with the participation of stakeholders. Questionnaire related to child labour, forced labour, safety, housing and amenities, pay and conditions and etc was conducted with the stakeholders during the assessment.</p>	Complied
6.1.3	<p>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 improvement plan for the SIA was developed on 3/5/2016 by the mill, 10/11/2016 for Sindora Estate and 3/5/2016 for REM Estate. The plan has incorporated action taken, date of actions taken and person in charge. Records of action taken was sighted.</p>	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
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. - Minor compliance -	The improvement plan was reviewed on yearly basis and the last review was conducted on 3/5/2016 for mill, 10/11/2016 for Sindora Estate and 3/5/2016 for REM Estate. Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No scheme smallholders involved the Sindora Certification Unit. Not applicable
Criterion 6.2: 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 -	Communication and Consultation Management Guidelines dated November 2009 was established to ensure communicate with internal and external stakeholders on matters related to social and environmental aspects and impacts, performance and OSH was carried out effectively. Modes for internal communication such as muster, meetings, notice board and posters, campaigns, inspections, suggestion boxes, email and memo. Any request shall be recorded in the Enquiry Register and acted within 7 working days. Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Executive Regional Controller was automatically been appointed as social person in charge for the whole complex. Letter with Doc. Ref. SQD/SOC/024/16 dated 23/10/2016 was distributed to whole complex by Regional Head of Plantation Operation. In mill, the manager has appointed Grading Supervisor to handle internal social issue. Appointment letter dated 15/11/2016 was documented. Senior Assistant Manager has been appointed as Social Officer to handle social issue in Sindora estate. Appointment letter from the manager dated 23/11/2016 is sighted. Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
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 -	<p><u>Sindora POM:</u></p> <p>Stakeholder list was generated on 10/8/2016 and 1/10/2016 for the mill where it has included FFB suppliers, contractors and government authorities. Stakeholder meeting was conducted on 27/6/2016 with FFB suppliers and 10/11/2016 combined with Sindora Estate. Meeting minutes is sighted and no issue was raised during the meeting.</p> <p><u>Sindora Estate:</u></p> <p>Stakeholder list was developed on 27/11/2016 where their relevant stakeholders were included into the list. Sindora Estate has conducted stakeholder meeting on 10/11/2016 with the participation of stakeholders such as BAKAJ, neighbouring plantations, school representatives, contractors and etc. An action plan to monitor issues raised during the meeting was generated on 13/11/2016.</p> <p><u>REM Estate:</u></p> <p>Stakeholder list was developed on 21/1/2016 and stakeholder meeting was conducted on 18/5/2016 and 9/11/2016 with the participation of relevant stakeholders such as school representative, neighbouring plantations and etc. No issue was raised during the meeting.</p>	Complied
<p>Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p>		
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 -	Kulim (M) Berhad has implemented Grievance Procedure Plans dated 4/9/2007. The dispute resolution mechanisms are established through open and consensual agreements with affected parties. For internal stakeholders, the grievances are dealt through Consultative Committees. The management has developed Grievance Policy dated 1/1/2008. The time to process the complaints or grievances is 10 working days.	Complied
6.3.2 Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	Enquiry register logbook was implemented to record any request and enquiry from the stakeholders. Housing Repair form was implemented for the internal workers to lodge complaint related to housing.	Complied
<p>Criterion 6.4: 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.</p>		
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 -	Kulim (M) Berhad has established SOP to identify legal and customary rights as well as people entitled to compensation dated 4/9/2007. The procedure is to ensure any negotiation with regards to the compensation for loss of local rights are dealt with fairly.	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
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 as per criteria 6.4.1. 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. Complied
Criterion 6.5: 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.		
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	The management has detailing basic salary, allowance, overtime pay, number of working days, number of absence and etc into the payslip. The payslip also recorded if there is any deduction made. Sampled payslips were as below: <ul style="list-style-type: none"> a) Employee No.: 623088 (Sindora POM) b) Employee No.: 623165 (Sindora POM) c) Employee No.: 623140 (Sindora POM) d) Employee No.: 622963 (Sindora Estate) e) Employee No.: 622801 (Sindora Estate) f) Employee No.: 680200 (Sindora Estate) g) Passport No.: A7959982 (Sindora Estate Contractor's Worker) h) I/C No.: 58XXXX-XX-5233 (Sindora Estate Contractor's Worker) i) Employee No.: 603583 (REM Estate) j) Employee No.: 603428 (REM Estate) k) Employee No.: 603804 (REM Estate) l) Passport No.: B3628445 (REM Estate Contractor's Worker) m) Passport No.: A8874859 (REM Estate Contractor's Worker) Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

<p>6.5.2</p>	<p>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>Employment contract was implemented by Kulim (M) Berhad where the contract has detailing position offered, basic salary, allowance, working hours and rest day, annual leave and public holiday entitlement, deduction of salary, reason of dismissal and etc. Safe keeping of passport for foreign workers was also elaborated in the employment contract. All the workers had acknowledged on the employment contract prior commencement of work. The terms in the contract was briefed to the workers. Sampled employment contracts as below:</p> <ul style="list-style-type: none"> a) Employee No.: 623140 who joined on 1/1/2016 (Sindora POM) b) Employee No.: 623168 who joined on 21/8/2016 (Sindora POM) c) Employee No.: 680102 who joined on 10/8/2015 (Sindora Estate) d) Employee No.: 622617 who joined on 12/4/2011 (Sindora Estate) e) Employee No.: 603874 who joined on 8/9/16 (REM Estate) f) Employee No.: 603850 who joined on 13/5/2016 (REM Estate) g) Passport No.: B121486 (REM Estate Contractor’s Worker) <p>Extension of employment consent letter was signed by the employees who have worked for more than 2 years (For Indonesian) and 3 years (For Bangladeshi) and the service extension was 2 years in Sindora POM and 1 year in Sindora Estate. Sampled of extension of employment consent letter as below:</p> <ul style="list-style-type: none"> a) Employee No.: 623171 where the extension valid until 7/3/2017 (Sindora POM) b) Employee No.: 623170 where the extension valid until 8/2/2018 (Sindora POM) c) Employee No.: 6229631 where the extension valid until 7/3/2017 (Sindora Estate) d) Employee No.: 622801 where the extension valid until 8/2/2018 (Sindora Estate) e) Employee No.: 603428 who joined on 25/3/2008 (REM Estate) f) Employee No.: 603619 who joined on 1/11/2013 (REM Estate) <p>However, the employment contract for the contractor’s workers were not stated the terms and such as annual leave and public holiday leave entitlement, overtime rate, dismissal reason and etc. Sampled contracts as below:</p> <ul style="list-style-type: none"> a) Passport No.: B4359426 who joined on 8/11/2016 (Sindora Estate Contractor’s Worker) b) Passport No.: A7959982 who joined on 21/6/2016 (Sindora Estate Contractor’s Worker) c) Passport No.: B2359522 who joined on 1/11/2016 (Sindora Estate Contractor’s Worker) d) I/C No.: 57XXXX-XX-6803 who joined on 15/2/2016 (Sindora Estate Contractor’s Worker) 	<p>Major nonconformance</p>
--------------	--	--	-----------------------------

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
	Thus, a major non-conformity was raised.	
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 –	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 –	Complied
Criterion 6.6: 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.		
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Complied
Criterion 6.7: Children are not employed or exploited.		

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance
6.7.1 There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Kulim (M) Berhad has implemented Guidelines for General Workers and Kulim Sustainability Handbook where they will not employed child labour according to Children and Young Persons (Employment) Act 1966. Through document reviewed found that all the workers were above 18 years old.	Complied
Criterion 6.8: 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 -	Kulim (M) Berhad has implemented Kulim Sustainability Handbook dated June 2007 and Guidelines for General Workers. People Policy dated 1/1/2008 has been developed and the management is committed to support non-discrimination in any form. They respect equal opportunities and maintain an equal gender relationship on the work environment.	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 -	Indonesian workers are recruited with 2 years contract while Bangladesh workers are recruited with 3 years contract. Local workers are on a long term employment. No any kind of discrimination was noted. Job opportunities and amenities such as water and electricity supplies with subsidized to the workers at certain amount, free housing, medical care are given to all employees without discrimination. During interview with the workers found that no discrimination based on nationality, gender and race from the employers and all of them were treated equally.	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 -	The management recruited employees based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. No discrimination based on nationality, race, gender, age, caste and etc was sighted during the audit.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.		
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 -	Policy Statement on Sexual Harassment has been developed 1/1/2008. Kulim (M) Berhad has maintained a safe and healthy work environment to all workers especially women from any form of harassment, humiliation and intimidation of a sexual nature. Training on the policy has been given to the workers on 24/11/2016. Attendant list and training materials were sighted.	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 -	Kulim (M) Berhad has established a SOP for protect the rights of reproductive. However, they did not develop policy to protect the reproductive rights of all. Thus, a major non-conformity was raised.	Major nonconformance

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance	
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 -	The management has established Women on Ward (WoW) committee to act as a medium to protect all the female workers from sexual harassment. A procedure on sexual harassment has been developed and to be utilized if there is any sexual harassment case reported. Last meeting was conducted on 25/2/2016 and 28/9/2016 for the mill, 25/2/2016 and 28/9/2016 for Sindora Estate and 22/3/2016 and 22/7/2016 for REM Estate. No sexual harassment case was reported through interview with the workers. The committee has organized activities such as Sexual Harassment Eradication & Prevention Programmes, Awareness of Cancer Programme, gotong-royong, bakery class, Mother's day celebration and religion classes.	Complied
Criterion 6.10: 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 -	The mill has displayed the FFB pricing from January to October 2016 at the weighbridge area. The pricing was according to MPOB set price. Grading guideline according to MPOB was publicly displayed at the weighbridge area.	Complied
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 -	Pricing mechanism was documented in the contract agreement signed by the FFB suppliers. The mechanism has included oil mill achieved OER, oil mill achieved KER, MPOB CPO and PK average price and etc. The monthly payments were made in three instalments. First instalment was made on or before 15 th of the month for FFB delivered in first 10 days. Second instalment was made on or before 25 th of the month for the next 10 days crop received and the last payment was made on or before 7 th day of the following month.	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 -	Sampled contract agreements were as below: a) Company No.: 790972-D (FFB supplier) which valid until 31/12/2016. b) Contract No.: EPA/LSA 6/2009 (Supplier of driver/ tractor for POME application) which valid until 31/10/2017.	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	Payment conditions were stated in the contract agreement that signed by the suppliers and contractors. The payment were made accordingly by the Head Office.	Complied
Criterion 6.11: 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 -	Mill and estate management have made donation to school, religious association, NUPW association and WoW for activities organized by them. They made the contribution upon request from the stakeholders. Petty vouchers were sighted. Besides, WoW has organized programmes such as Awareness for Cancer and Sexual Harassment Prevention to the workers. The management had sponsor transportation to send students to school outside estate's compound. Interviewed with the Union representative found that the CSR has been given to the workers. The estate has subsidized water and electricity bill to the workers at certain amount.	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

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 –	Not applicable as there is no scheme smallholder involved in the operating units.	Not applicable
Criterion 6.12: 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 -	<p>Kulim (M) Berhad has implemented Kulim Sustainability Handbook dated June 2007. People Policy has been developed and the management is prohibited to engage or support the use of forced labour in all of their operations and administrations. All the local and foreign workers were hold a valid identification card and passports prior to work.</p> <p>Sampled workers below possessed valid working permit:</p> <ul style="list-style-type: none"> a) Employee No.: 623171 valid until 3/3/2017 (Sindora POM) b) Employee No.: 623170 valid until 4/2/2017 (Sindora POM) c) Employee No.: 680102 valid until 6/8/2017 (Sindora Estate) d) Employee No.: 622801 valid until 24/9/2017 (Sindora Estate) e) Passport No.: B2359522 valid until 30/10/2017 (Sindora Estate Contractor’s Worker) f) Employee No.: 603874 valid until 5/7/2017 (REM Estate) g) Employee No.: 603428 valid until 20/3/2017 (REM Estate) h) Passport No.: B1710940 valid until 4/9/2017 (REM Estate Contractor’s Worker) <p>Passport of the foreign workers were kept by the management where it stated in the employment contract Section 10 for safety purpose. The workers had signed on the contract. Interviewed with the workers confirmed that they were agreed and voluntarily to safe keep the passport by employer.</p>	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No contract of substitution was noted.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Equal opportunity and non-discriminatory policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals.	Complied
Criterion 6.13: 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 -	Kulim (M) Berhad has implemented Kulim Sustainability Handbook under Core Labour Standards. The management respects the human rights of the employees. Refresher training was provided to the workers on 24/11/2016.	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance						
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.						
<p>Principle 7: Responsible development of new plantings</p>								
<p>There is conversion of the rubber trees to oil palm on the area that has been previously certified at Sindora Estate.</p>								
<p>Criterion 7.1: A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.</p>								
7.1.1	An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented. - Major compliance -	The latest SIA was done by Malaysian Environmental Consultant on 25-27/4/16. The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas. Finalized SEIA report dated April 2016 was verified during assessment. The EIA for conversion of rubber to oil palm was carried out accordingly.						
7.1.2	Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts. - Minor compliance -	There is management planning on new planting which approved by Estate Operation Department. However, the operational procedures have not been developed for conversion of rubber to oil palm. Thus, a minor NCR was raised.						
7.1.3	Where the development includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed shall be given particular attention. - Minor compliance -	There was no outgrower scheme included in Sindora Estate land development						
<p>Criterion 7.2: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>								
7.2.1	Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations. - Major compliance -	Soil map available. Refer to soil map prepared by Agronomy, Advisory & Services Department. <table border="1" data-bbox="657 1713 1297 1809"> <thead> <tr> <th>No.</th> <th>Type of Soil</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kompleks Aluvium Sungai</td> </tr> <tr> <td>2</td> <td>Siri Rengam</td> </tr> </tbody> </table>	No.	Type of Soil	1	Kompleks Aluvium Sungai	2	Siri Rengam
No.	Type of Soil							
1	Kompleks Aluvium Sungai							
2	Siri Rengam							
7.2.2	Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available and taken into account in plans and operations. - Minor compliance -	Topographic maps available and prepared by Agronomy, Advisory & Services Department. Noted the new planting plot P14 (72.9Ha), contour:20-81m and plot P15B (39.24Ha), contour:82-161m						

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance	
<p>Criterion 7.3: New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.</p>			
7.3.1	<p>There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2). - Major compliance -</p>	<p>The new planting plot was previously planted with rubber. The area was not categorized under HCV based on the baseline assessment 2016.</p>	<p>Complied</p>
7.3.2	<p>A comprehensive HCV assessment, including stakeholder consultation, shall be conducted prior to any conversion or new planting. This shall include a land use change analysis to determine changes to the vegetation since November 2005. This analysis shall be used, with proxies, to indicate changes to HCV status. - Major compliance -</p>	<p>No evidence to show that the new planting/conversion plot P14 and P15B incorporated in the new HCV assessment including land use change analysis. Thus, Major NC was issued.</p>	<p>Major nonconformance</p>
7.3.3	<p>Dates of land preparation and commencement shall be recorded. - Minor compliance -</p>	<p>Dates of land preparation and commencement of planting was recorded and progress of planting is reported on a daily basis. First rubber tree felling and clearing was on 2/6/14 and completed on 16/8/14 for P14 (72.90Ha) while for P15B (39.24Ha), the felling and clearing activities were carried out on 2/7/15 and completed on 2/9/15.</p>	<p>Complied</p>
7.3.4	<p>An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower's relevant operational procedures (see Criterion 5.2). - Major compliance -</p>	<p>The biodiversity action plan has been established and updated on yearly basis. The HCV and Biodiversity around the estate were monitored and maintained by the respective estates. Refer to criteria 5.2.4.</p>	<p>Complied</p>
7.3.5	<p>Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2). - Minor compliance -</p>	<p>It is verified that there has been no area required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations at Sindora Estate new planting plot. Thus consultation with communities of such nature is not applicable.</p>	<p>Complied</p>
<p>Criterion 7.4: Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.</p>			

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator		Assessment Findings	Compliance
7.4.1	Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided - Minor compliance -	There is no peat soil or soil categorised as marginal or fragile soil at Sindora estates. The soil maps survey was carried out by Agronomy, Advisory & Services Department.	Complied
7.4.2	Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts. - Major compliance -	There is no peat soil or soil categorised as marginal or fragile soil at Sindora estates. The soil maps survey was carried out by Agronomy, Advisory & Services Department.	Complied
Criterion 7.5:			
No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
7.5.1	Evidence shall be available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed and ratified by these local peoples. - Major compliance -	The new planting plot was previously planted with rubber and within their certified area. There were no communities or local people establishment at the specific plot.	Complied
Criterion 7.6:			
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.			
7.6.1	Documented identification and assessment of demonstrable legal, customary and user rights shall be available. - Major compliance -	The new planting plot was previously planted with rubber and within their certified area. There were no communities or local people establishment at the specific plot.	Complied
7.6.2	A system for identifying people entitled to compensation shall be in place. - Major compliance -	The new planting plot was previously planted with rubber and within their certified area. There were no communities or local people establishment at the specific plot.	Complied
7.6.3	A system for calculating and distributing fair compensation (monetary or otherwise) shall be in place. - Major compliance -	The new planting plot was previously planted with rubber and within their certified area. There were no communities or local people establishment at the specific plot.	Complied
7.6.4	Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development. - Minor compliance -	The new planting plot was previously planted with rubber and within their certified area. There were no communities or local people establishment at the specific plot.	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
7.6.5 The process and outcome of any compensation claims shall be documented and made publicly available. - Minor compliance -	The new planting plot was previously planted with rubber and within their certified area. There were no communities or local people establishment at the specific plot.	Complied
7.6.6 Evidence shall be available that the affected communities and rights holders have access to information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	The new planting plot was previously planted with rubber and within their certified area. There were no communities or local people establishment at the specific plot.	Complied
<p>Criterion 7.7: No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.</p>		
7.7.1 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 -	Sustainability handbook was described on Environmental policy including Zero open burning policy dated June 2007. Management complying with the Malaysian environmental law –EQA and Regulations 1974. Based on the land clearing records, zero burning techniques are implemented during land preparation for P14 and P15B planting.	Complied
7.7.2 In exceptional cases where fire has to be used for preparing land for planting, 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 -	No use of fire for land preparation for P14 and P15B planting.	Complied
<p>Criterion 7.8: New plantation developments are designed to minimise net greenhouse gas emissions.</p>		
7.8.1 The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated. - Major compliance -	Carbon stock assessment was carried for the proposed new planting. Refer to report carried out on 24/4-1/5/16. However, the carbon stock assessment was not included for new planting at P14 and P15B. Thus, a major NCR was raised.	Major noconformance
7.8.2 There shall be a plan to minimise net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options. - Minor compliance -	Carbon stock assessment was carried for the proposed new planting. Refer to report carried out on 24/4-1/5/16. However, the carbon stock assessment was not included for new planting at P14 and P15B. Therefore, no plan was established to minimise GHG emissions. Thus, a minor NCR was raised.	Minor noconformance

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
Principle 8: Commitment to continual improvement in key areas of activity		
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.		
8.1.1	<p>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"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Optimising the yield of the supply base. <p>- Major compliance -</p> <p><u>Sindora POM:</u> The mill has initiated a continual improvement plan for Y2016 as below:</p> <ol style="list-style-type: none"> a) Install 1 unit of poly tank (500 gallon) for workers unit at mill premise to provide water for domestic use. The target date to be completed on December 2016. b) Purchase of portable gas detector to improve safety during works for confine space. Target date to be completed on December 2016. <p>Budget has been allocated accordingly in the budget 2016.</p> <p><u>Sindora Estate:</u> The estate has initiated continual improvement plan Y2016 for social and environmental issues as such:</p> <ol style="list-style-type: none"> a) To maintain buffer zone peg at buffer zone areas. b) To provide water tank on stages to ensure sufficient water tanks to store water during drought season. <p><u>REM Estate:</u> The management has conducted Management Review Meeting on 19/6/2016. A continuous improvement plan was developed as such:</p> <ol style="list-style-type: none"> a) Repaint labour quarters and repair parameter drains at the housing area. Target date to be completed on Y2017. 	Complied

**RSP0 Public Summary Report
Revision 4 (November / 2016)**

Appendix B: Approved Time Bound Plan

Project	Estate	Plan
Indonesia	PT RAJ	2019
	PT TPR	
	PT WIN	
	PT SSR	
Trader	Eng Lee Heng	2018

List of Estate Manage by Kulim (Malaysia) Berhad			
Mill Base	Kulim / Jcorp Estate	Estate	Status
Tereh Mill	Kulim Estate	Tereh Utara	Certified RSP0
		Tereh Selatan	
		Selai	
		Enggang	
		Mutiara	
		Sg Sembrong	
		Sg Tawing	
Sedenak Mill		Sedenak	
		Rengam	
		Basir Ismail	
		Ulu Tiram	
Sindora Mill		Kuala Kabong	
		REM/Pasak	
		Sindora	
Palong Mill		Sungai Papan	
		Sepang Loi	
		UMAC	
		Labis Bahru	
		Mungka	
		Kemedak	
Pasir Panjang Mill	Kulim Estate	Pasir Panjang	In progress
		Siang	
	Jcorp Estate	Bukit Kelompok	
		Tunjuk Laut	
		Pasir Logok	
		Bukit Payung	

Appendix C: Certification Unit RSPO Certificate Details

Kulim (Malaysia) Berhad
Sindora Palm Oil Mill
KB 501
86009 Kluang, Johor
Malaysia

BSI RSPO Certificate №: RSPO 612392

Date of Initial Certificate Issued: 23/01/2009

Date of Expiry: 22/01/2019

RSPO membership number: 1-0006-04-000-00

Applicable Standards: RSPO P&C Generic 2013; RSPO Certification System June 2007 (revised March 2011); Annex 4: Procedure for Annual Surveillance; RSPO P&C MY-NIWG 2014; RSPO Supply Chain Certification Standard November 2014 Module E – CPO Mill: Mass Balance

Sindora Palm Oil Mill and supply base					
Location Address	Sindora Palm Oil Mill, 86009 Kluang, Johor, Malaysia				
GPS Location	103° 27' 44.316" E ; 1° 59' 7.339" N				
CPO Tonnage Total	42,261.00 mt				
PK Tonnage Total	11,426.00 mt				
CPO Claimed for Certification*	22,997.00 mt				
PK Claimed for Certification *	6,218.00 mt				
Own estates FFB Tonnage	112,385.00 mt				
Scheme Smallholder FFB Tonnage	-				
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Sindora Estate	2,105.41	1,293.02	520.63	3,919.06	30,815.00
Sungai Papan Estate	2,145.51	468.56	411.81	3,025.88	53,457.00
REM Estate	1,469.79	279.82	491.50	2,241.11	28,113.00
Total	5,720.71	2,041.40	1,423.94	9,186.05	112,385.00

Appendix D: Assessment Plan

Date	Time	Subjects	Mohd Hafiz	Boon Han	Ning Shing
Tuesday 29/11/2016	PM	Audit Team travelling to Kluang <ul style="list-style-type: none"> Stakehodler meeting with government agencies 	√	√	√
Wednesday 30/11/2016 Sindora Palm Oil Mill	08.30 – 09.00	Opening meeting (Sindora Palm Oil Mill) <ul style="list-style-type: none"> Presentation by Sindora CU Team Presentation by BSI Lead Auditor - introduction of team members and assessment agenda 	√	√	√
	09.00 – 12.30	Sindora Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	Sindora Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, SCCS, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	16.30 – 17.00	Interim Closing Briefing	√	√	√
Thursday 01/12/2016 Sindora Estate	08.30 – 12.30	Sindora Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	10.00 – 12.30	Meeting with stakeholders (Village rep, smallholders, Workers Leader, contractor etc.)	-	-	√
	12.30 - 13.30	Lunch	√	√	√
	13.30 – 16.30	Sindora Estate 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).	√	√	√
	16.30-17.00	Interim closing briefing	√	√	√

**RSPO Public Summary Report
Revision 4 (November / 2016)**

Date	Time	Subjects	Mohd Hafiz	Boon Han	Ning Shing
Friday 02/12/2016 REM & Pasak Estate	08.30 – 12.30	REM & Pasak Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	12.30 – 13.30	Lunch	√	√	√
	13.30 - 16.00	REM & Pasak Estate 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).	√	√	√
	16.00 - 16.30	Verify any outstanding issues & Preparation for closing meeting	√	√	√
	16.30 – 17.30	Closing Meeting	√	√	√
Saturday 03/12/2016	AM	Audit Team travelling back to KL	√	√	√

Appendix E: Stakeholders Contacted

INTERNAL STAKEHOLDERS

<ul style="list-style-type: none"> -Internal workers and staffs -Hospital/ Medical Assistants -Assistant Managers -Managers -Crèche Attendants -NUPW representative -Indonesia Workers Representative -Bangladesh Workers Representative -Workshop Attendants -Chemical store operators 	<ul style="list-style-type: none"> -Contractors -Sundry shop owners 	
---	---	--

EXTERNAL STAKEHOLDERS

<p>Government Departments</p> <p>-</p>	<p>NGOs and others</p> <p>-</p>	<p>Local Communities</p> <p>-Felda Ulu Belitung Village</p>
---	--	--

**RSPO Public Summary Report
Revision 4 (November /2016)**

Appendix F: Sindora Palm Oil Mill Supply Chain Assessment Report (Module E – CPO Mills – Mass Balance)

Requirements	Compliance
E.1 Definition	
<p>E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The Sindora Palm Oil Mill receives and process certified and non- certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the annual assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and sales volume of RSPO certified palm products through RSPO IT System.</p>
E.2 Explanation	
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>E.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 or book and claim).</p>	<p>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).</p>
E.3 Documented procedures	
<p>E.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:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The name 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 procedures for the implementation of this standard.</p>	<p>Latest written documented procedures (No. SM/WI/2 Revised on 25/10/16) for the chain of custody is with Mass Balance (MB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB. This developed based on the RSPO SCCS 21 November 2014.</p> <p>The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive. The MB model is used because certified and non-certified FFB is received and processed at Sindora Palm Oil Mill.</p> <p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>
<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Sindora Palm Oil Mill has documented procedures for the incoming certified and non-certified FFB, processing and outgoing palm products (CPO and PK). For RSPO certified FFB, Clause 8.1 the weigh bridge officer will stamp the Supply Chain Model- Mass Balance on weighing ticket and delivery chit with documented procedures (No. SM/WI/2 Revised on 25/10/16)</p>
E.4 Purchasing and goods in	

**RSPO Public Summary Report
Revision 4 (November / 2016)**

<p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB.</p> <p>Records of the FFB as below:</p> <ul style="list-style-type: none"> a. FFB Weighbridge ticket b. Delivery Chit c. Daily & Monthly Mill Production Record <p>Samples taken as below:</p> <ul style="list-style-type: none"> a. Weighbridge ticket no: 92337; dated 15 Nov 2016 b. Weighbridge ticket no: 92551; dated 19 Nov 2016
<p>E.4.2 The site shall inform the CB immediately if there is a projected overproduction.</p>	<p>The facilities aware of this procedure.</p>
<p>E.5 Record keeping</p>	
<p>E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p> <p>(b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. It stated all the source of FFB by categorized into Group Estates and Outside Crop. For Deliveries, all the dispatch recorded in daily CPO production records.</p> <p>All the records available as below:</p> <ul style="list-style-type: none"> a. FFB Weighbridge ticket b. Delivery Chit c. Daily & Monthly Mill Production Record d. Daily CPO Production Record <p>Computerized system in place. Records verified by internal and external audit. Computerized system in place with the delivery deducted accordingly.</p> <p>The Mill aware that only positive stock can be delivered. No short selling.</p>
<p>E.5.2 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement</p>	<p>No outsourcing activities.</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Actual Tonnage Certified Palm Production – 1st November 2015 – 31 October 2016 (3rd ASA)

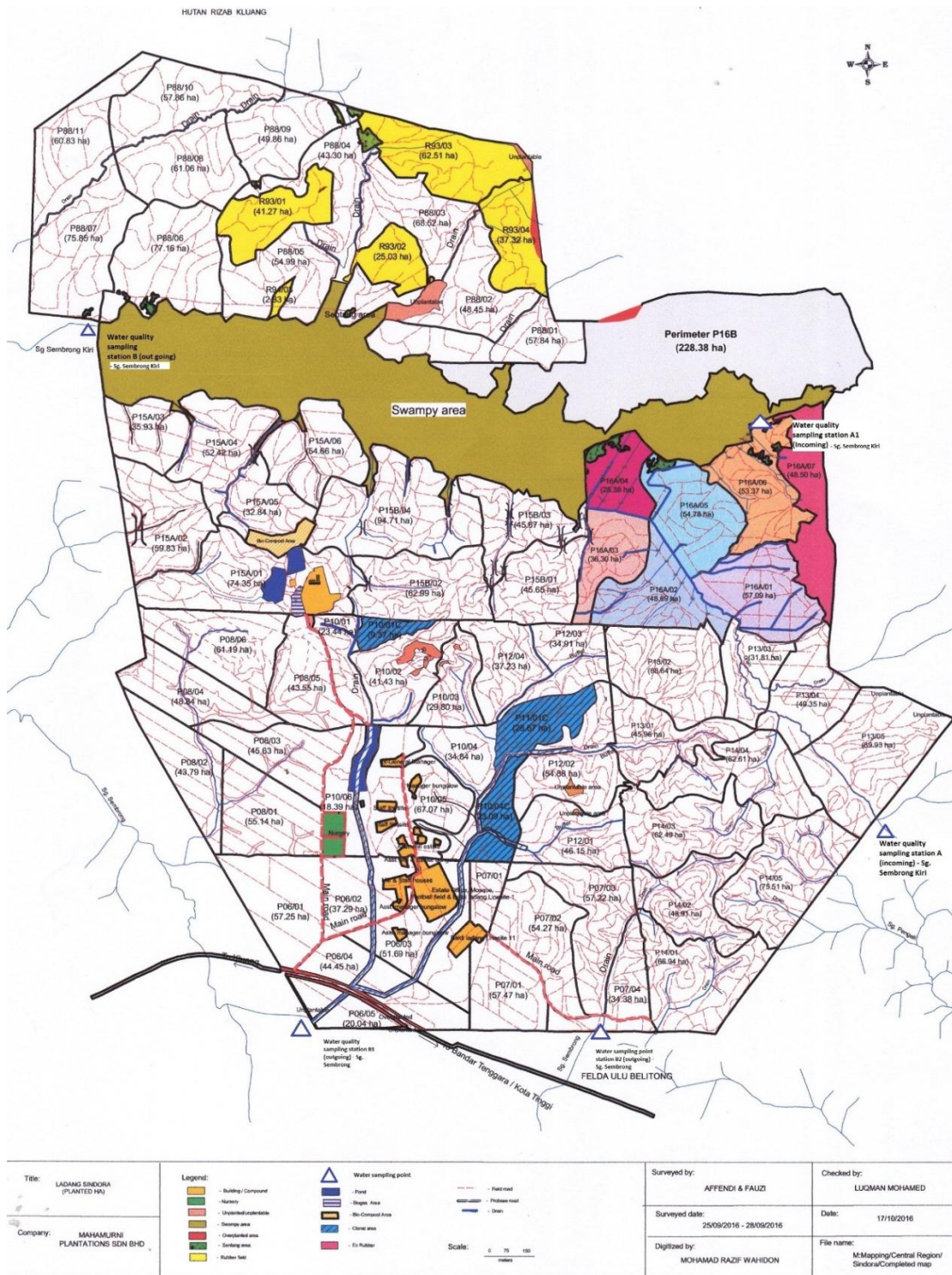
Mill	Capacity	CPO	PK
Sindora Palm Oil Mill	40 mt/hr	44,664.44	12,292.48

Actual Tonnage Sales of Certified Palm Products - 1st November 2015 – 31 October 2016 (3rd ASA)

Mill	Certified CPO Sales	Certified PK Sales	Remarks
Sindora Palm Oil Mill	11,650.00	6,797.00	

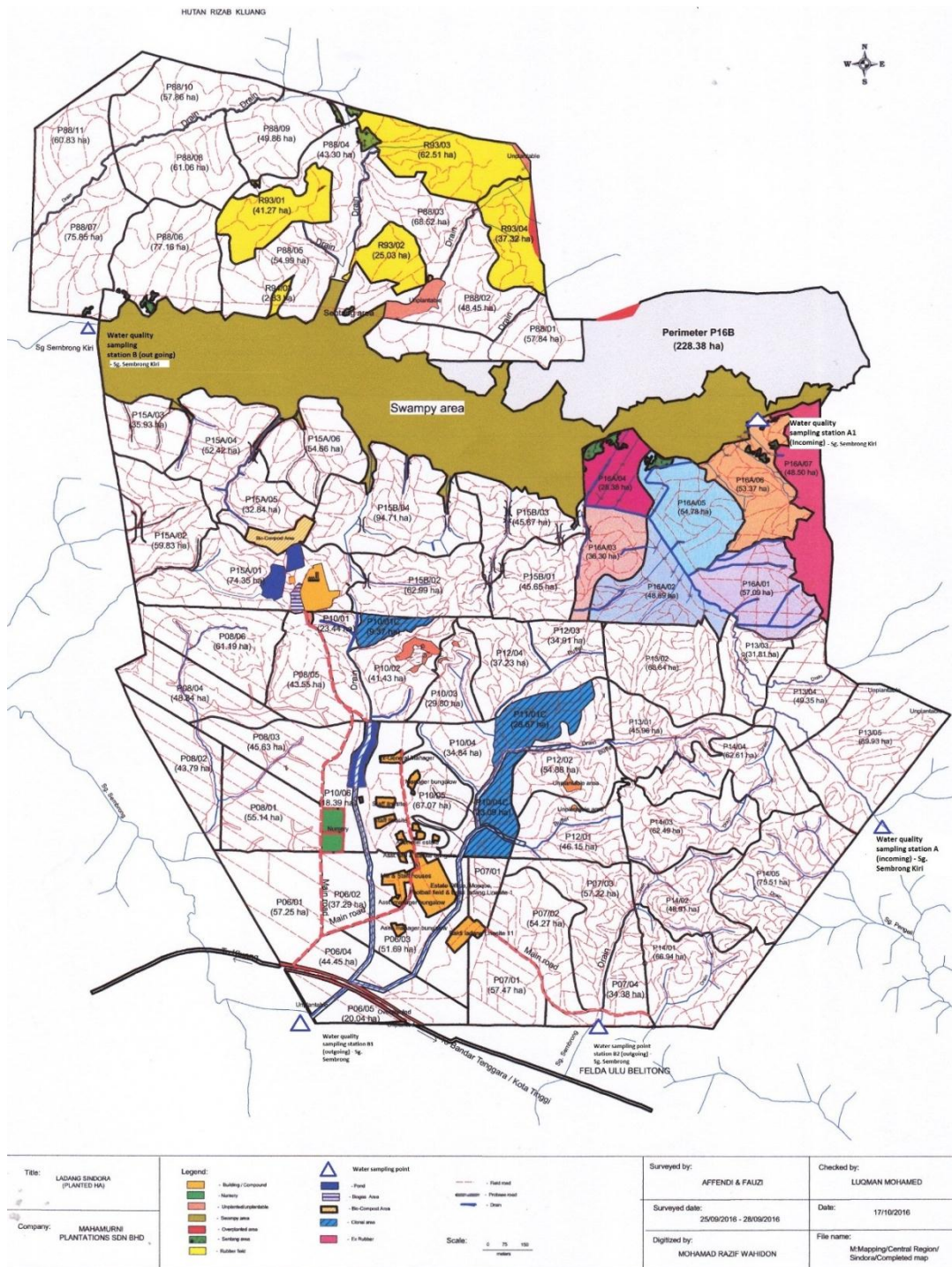
Month	Certified Supply Base (from own certificate scope) (mt)				Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable	Total FFB/Month (mt)
	Sindora Estate	REM Estate	Pasak Estate	Sungai Papan Estate	Others	
November 2015	3,187.74	2,277.46	1,699.01	4,273.37	9,012.68	20,450.26
December 2015	2,625.92	1,734.34	1,338.91	4,061.49	6,129.99	15,890.65
January 2016	2,261.15	1,361.72	1,160.70	2,427.64	4,985.38	12,196.59
February 2016	2,601.33	1,411.48	1,165.25	2,532.57	6,321.15	14,031.78
March 2016	2,663.31	1,515.18	1,249.73	2,632.92	7,127.93	15,189.07
April 2016	2,646.48	1,266.47	1,064.50	3,230.03	7,304.51	15,511.99
May 2016	2,992.05	1,260.78	1,148.23	3,722.40	6,759.79	15,883.25
June 2016	3,449.41	1,524.21	1,074.06	5,340.91	10,709.47	22,098.06
July 2016	3,574.87	1,516.84	875.97	5,958.66	9,409.33	21,335.67
August 2016	3,348.11	1,502.79	945.08	7,022.72	9,716.02	22,534.72
September 2016	3,639.62	1,715.49	1,363.26	6,361.11	10,657.05	23,736.53
October 2016	3,469.61	1,636.57	1,335.71	6,447.89	10,396.85	23,286.63
Total	36,459.60	18,723.33	14,420.41	54,011.71	98,530.15	222,145.20

Appendix G: Location Map of Sindora Palm Oil Mill Certification Unit and Supply bases

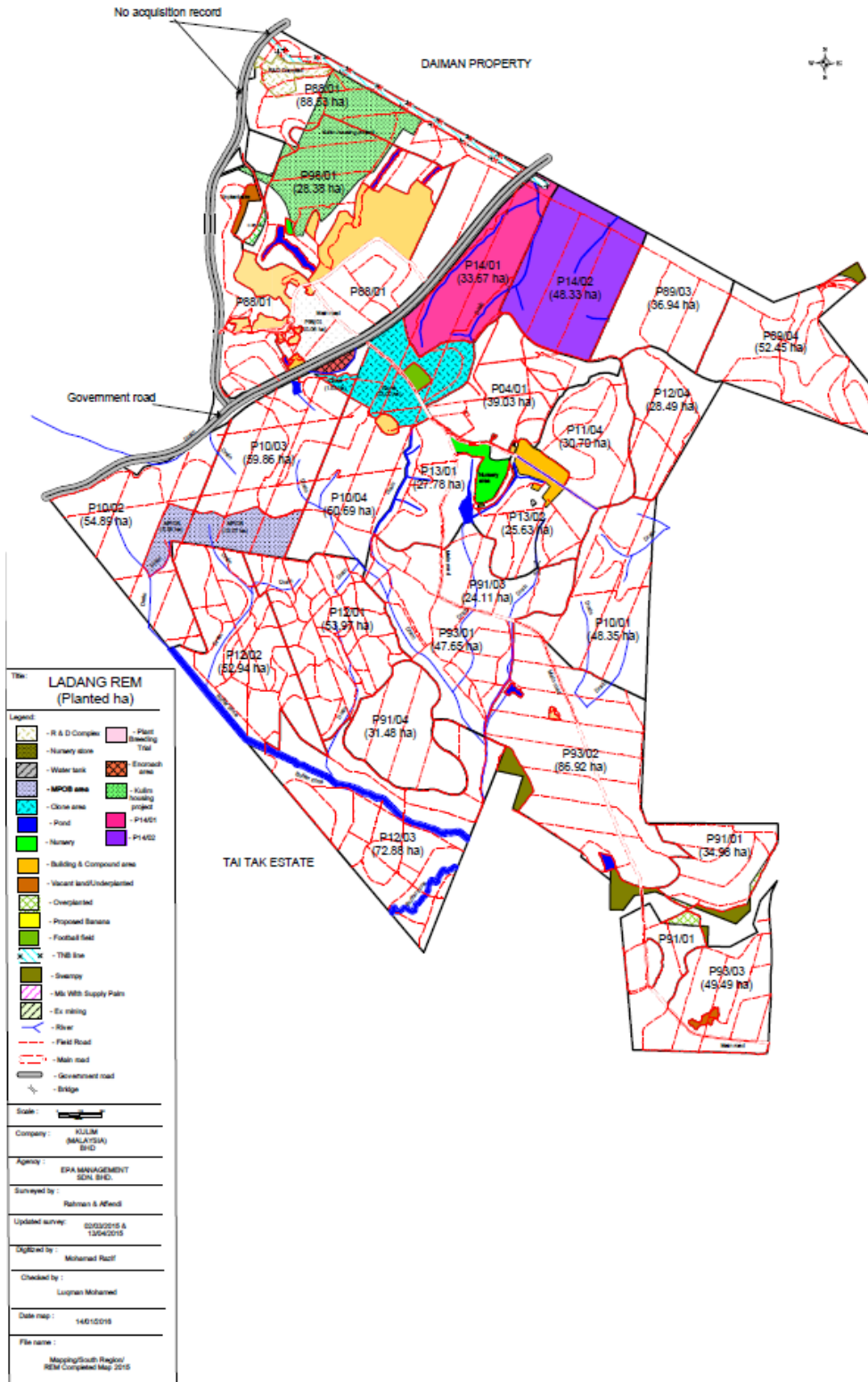


* Sindora POM located within Sindora Estate area.

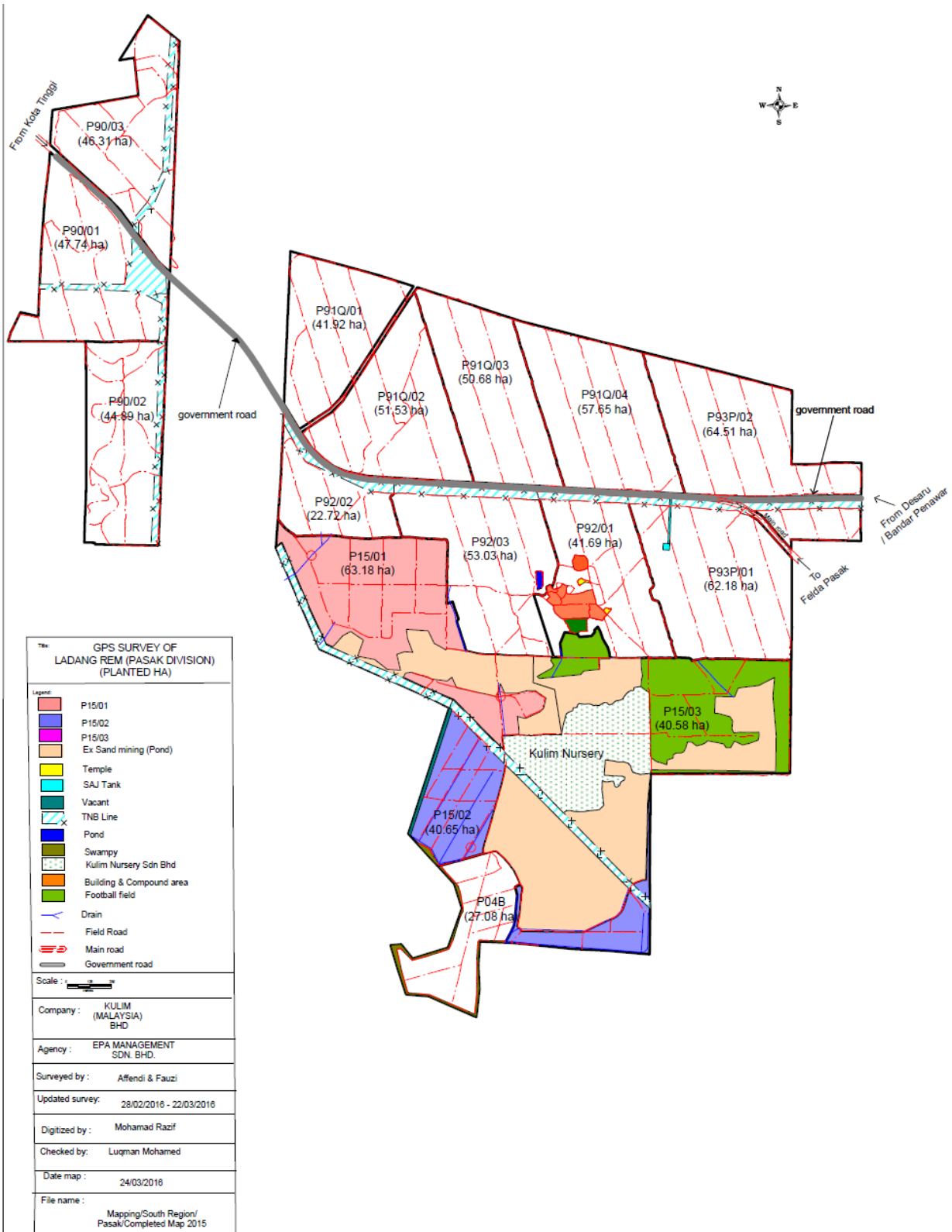
Appendix H: Sindora Estate Field Map



Appendix I: REM Estate Field Map



**RSPO Public Summary Report
Revision 4 (November /2016)**



Appendix J: List of Smallholder Sampled

-Not Applicable-

Appendix K: List of Abbreviations Used

AN	Ammoniacal Nitrogen
ANPN	National Park Agency Gabon
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DGEPN	Environmental Protection Agency Gabon
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
GMP	Good Manufacturing Practice
HCV	High Conservation Value
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MSDS	Material Safety Data Sheet
O&G	Oil and Grease
PK	Palm Kernel
PPE	Personal Protective Equipment
PSQM	Plantation Sustainability and Quality Management
PQR	Performance Quality Rating
RC	Re-Certification
RED	Renewable Energy Directive
RSPO P&C	Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SS	Suspended Solids
TN	Total Nitrogen
TS	Total Solids
VFA	Volatile Fatty Acids
SSD	System & Sustainability Department
KSTS	Kulim Safety Training and Services Sdn Bhd
AASD	Agronomy Advisory & Service Department
MEC	Malaysian Environmental Consultant