



RSPO PRINCIPLE AND CRITERIA 1st Annual Surveillance Assessment (ASA1_1) Public Summary Report

Sime Darby Plantation Sdn Bhd

Head Office: Level 3A, Main Block Plantation Tower, No. 2, Jalan P.J.U 1A/7 47301 Ara Damansara Selangor, Malaysia

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

Bukit Kerayong Road 42200 Kapar Klang, Selangor Malaysia



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Section 1: Scope of the Certification Assessment

1. Company Details	1. Company Details							
RSPO Membership Number	1-0008-04-000-00	Date	Member since: 6 September 2004					
			o September 2004					
Company Name	Sime Darby Plantation Sdn Bhd							
Address	Head Office: Level 3A, Main Bloc Ara Damansara, Selangor, Malay	•	ower, No. 2, Jalan PJU 1A/7 47301					
	Certification Unit: Strategic Oper Bukit Kerayong Road 42200 Kapa	•	U 7) – Bukit Kerayong Palm Oil Mill, ngor, Malaysia					
Subsidiary of (if applicable)	N/A							
Contact Name	Mdm. Shylaja Devi Vasudevan N Tuan Hj Anuar Bin Zakaria (Mill N	• ,	tainability Unit PSQM)					
Website	+603-78484379 (Head Office) +6013-2086959 (Mill)	E-mail	kks.bk.kerayong@simedarby.com					
Telephone	www.simedarby.com	Facsimile	03-78484356 (Head Office)					

2. Certification Information						
Certificate Number	RS	SPO 550181	Original Certificate Issued Date		15/04/2011	
		Expiry Date		ate	14/04/2021	
Scope of Certification		Palm Oil and Palm Kernel Production from Bukit Kerayong Palm Oil Mill and Supply Base (Bukit Kerayong Estate and Bukit Cheraka Estate)				n Oil Mill and Supply
Other Certification	ns					
Certificate Standard(s) Number			Certificate Issue	ed by	Expiry Date	

3. Location(s) of Mill & Supply Bases							
Name	Location (Man Defended #1	GPS					
(Mill / Supply Base)	Location [Map Reference #]	Easting	Northing				
Bukit Kerayong Palm Oil Mill (30 mt/hr)	KKS Bukit Kerayong, Jln Bk Kerayong, 42200 Kapar, Klang, Selangor.	101° 22′ 29.6″	3° 11′ 12.7″				
Bukit Kerayong Estate	Bk Kerayong Estate, P.O Box 204, 42200 Kapar, Selangor.	101° 21′ 00.5″	3° 10′ 31.3″				
Bukit Cheraka Estate	Bk Cheraka Estate, , P.O Box 202, 45809, Jeram Selangor	101° 22′ 01.7″	3° 13′ 38.6″				

...making excellence a habit."



4. Description of Supply Base								
Estate	Mature (ha)	Immature (ha)	Infras & Other (ha)	HCV (ha)	Total Planted (ha)	Total Hectarage	% of Planted	
Bukit Kerayong Estate	2,116.59	681.17	447.96	3.00	2,797.76	3,248.72*	86.12	
Bukit Cheraka Estate	2,732.45	667.41	326.50	55.52	3,399.86	3,781.88*	89.90	
Total	4,849.04	1,348.58	774.46	58.52	6,197.62	7,030.60		

Note: Infras = intrastructure (* It was different from previous figure due to human error)

5. Plantings & Cycle								
		Ag	je (Years)	Tonnage / Year				
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Estimated (Jan – Dec 2016)	Actual (Jan – Dec 2016)	Forecast (Jan – Dec 2017)
Bukit Kerayong Estate	0	1,707.78	258.73	93.17	56.91	51,889.82	47,118.14	50,576.10
Bukit Cheraka Estate	263.28	685.97	1,410.84	241.93	39.47	63,408.29	72,044.83	74,601.01
Total	263.28	2,393.75	1,669.57	335.1	96.38	115,298.11	119,162.97	125,177.11

BKE: Actual figure from Jan to Dec 2016 is 47,118.14Mt and previous data is from July to Dec 2016 (23,667.99Mt) BCE: Different data due to low crop trend estimation on the previous year.

BKE and BCE actual tonnage – diversion of half of its crop to East Oil Mill and Tennamaram Oil Mill

6. Certified Tonnage of FFB (Own Certified Scope)						
		Tonnage / year				
Estate	Estimated (ASA1_RC) (Jan – Dec 2016)	Actual (ASA1_RC) (Jan – Dec 2016)	Forecast (ASA1_1) (Jan – Dec 2017)			
Bukit Kerayong Estate	51,889.82	47,118.14	50,576.10			
Bukit Cheraka Estate	63,408.29	72,044.83	74,601.01			
Total	115,298.11	119,162.97	125,177.11			

7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable						
	Tonnage / year					
Independent FFB Supplier	Estimated (ASA1_RC) (Jan – Dec 2016)	Actual (ASA1_RC) (Jan – Dec 2016)	Forecast (ASA1_1) (Jan – Dec 2017)			
N/A	N/A	N/A	N/A			



8. Ce	8. Certified Tonnage								
	Estimated (ASA1_RC) (Jan – Dec 2016)			Actual (ASA1_RC) (Jan – Dec 2016)			Forecast (ASA1_1) (Jan – Dec 2017)		
Mill	FFB	CPO OER %	PK KER %	FFB	CPO OER	PK KER %	FFB	CPO OER	PK KER %
Bukit Kerayong Palm Oil Mill	115,298.11	23,463.16	6,226.10	73,542.87	14,532.07	3,507.99	125,177.11	27,163.43	6,884.74
Diversion crop from other certified SOU supply bases	19,144.89	3,895.99	1,033.82	652.47	128.93	31.12	9,773.76	2,120.91	537.56
Total	134,443.00	27,359.15	7,259.92	74,195.34	14,661.00	3,539.11	134,950.87	29,284.34	7,422.30
OER & KER %		OER: 20.35%	KER: 5.40%		OER : 19.76%	KER : 4.77%		OER: 21.70%	KER: 5.50%



Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
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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 accreditated 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 1^{st} Annual Surveillance Assessment was conducted from 17 - 19 January 2017 and the on-site closure of Major Non-conformity was conducted on 14 April 2017. 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 (Bukit Kerayong Estate & Bukit Cheraka 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 Principles & Criterias 2013 (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 y where y is the number of estates.

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.

All the previous nonconformities are remains closed. The assessment findings for the 1st Annual Surveillance Assessment are detailed in Section 3.3.

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 (Recertification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)		
Bukit Kerayong Palm Oil Mill	√	√	√	√	√		
Bukit Kerayong Estate	√	√	√	√	√		
Bukit Cheraka Estate	√	√	√	√	√		

Click here to enter a date.

Tentative Date of Next Visit: January 16, 2018 – January 18, 2018

Total No. of Mandays: 9 mandays

BSI Assessment Team:

Hu Ning Shing – Trainee Lead Auditor

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 her 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 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.

<u>Hafriazhar Mohd Mokhtar – Team Member</u>

Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the





RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.

Daniel Francis - Team Member

Daniel Francis is a fulltime employee with BSI Services Malaysia. He holds a Bachelor of Applied Science Degree in Food Science, graduated from Charles Sturt University, Australia. He has over 8 years of working experience in the oil and gas industry and 3 years in the food & beverage industry. He is an experienced auditor for several management system standards including ISO 9001, ISO 14001, OHSAS 18001 and Integrated Management System. He had completed the ISO 9001:2015 Lead Auditor Course and RSPO SCC Lead Auditor Course. He had been involved in the RSPO audits with various companies in Malaysia. During assessment, he covers the legal issues and occupational safety and health.

Accompanying Persons: -



Section 3: Assessment Findings

3.1 Details of audit results

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

X	Sime	Darby Plantation Sdn Bhd Time Bound Plan
\boxtimes	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
X	RSPO	P&C MY-NIWG 2014 Checklist
	RSPO	P&C TH-WG 2011 Checklist
X	RSPO	Supply Chain Certification Checklist November 2014
П	RSPO	P&C 2013 Generic Checklist

3.2 Progress against Time Bound Plan

Sime Darby Time Bound Plan (TBP) is included as Appendix B. Sime Darby has achieved RSPO certification for 34 management units in Malaysia and 24 Management Units in Indonesia. There are no any changes in the existing certified units in Malaysia. All units' certifications are valid. Sime Darby has acquired NBPOL. NBPOL is managed as a separate management unit. NBPOL has its own RSPO membership (1-0016-04-000-00) and have achieved certification for all the certification units. As for the Plantation in Liberia, Sime Darby has completed the NPP in 2011. However, the plantation sites will be included in TBP upon completion of the mill which is delayed due to Ebola and long drought season.

There was a change of the Time Bound Plan (TBP) under Sime Darby Indonesia Operation due to the on-going mediation and DSF facilitation Process by RSPO DSF at PT Mitra Austral Sejahtera (PT MAS). This was the result from the mediation meeting held on 22 July 2014. PT MAS was audited as per the original TBP by RSPO accredited Certification Body in 2011. Due to the on-going mediation process, the CB that assessed PT MAS is yet to issue the certificate. BSI has accepted the revision as justified revision due to the commitment shown by all parties involves resolving the community issue. This is also accepted by the CB that assessed PT MAS. Discussion was held with the CB that assessed the PT MAS and Sime Darby.

Due to the present mediation process, PT Mitra Austral Sejahtera TBP was revised to 2016 by Sime Darby pending on the resolution and mediation process which is acknowledged by RSPO. The final decision of issuing the certificate is under the CB that audited the PT MAS. BSI has contacted the CB and consultation was held. The CB that audited PT MAS accepted the revision of the TBP. BSI accepted the feedback from the CB that audited PT MAS as per the RSPO Certification System requirement "Where the Certification Body conducting the surveillance audit is different from that which first accepted the time-bound plan, the later Certification Body shall accept the appropriateness of the time-bound plan at the moment of first acceptance and shall only check continued appropriateness". BSI understands that there are community issue still under negotiation through agreed process.

The improvement is in progress and acknowledge by RSPO and all parties as mutually agreed process. Latest meeting among the community and Sime Darby was held on 14 January 2016. The current status details are provided in the Appendix B. BSI has consider that Sime Darby still comply with the RSPO requirement for partial certification and has justified the revision to TBP.



- a) There is no any other isolated lapse in Time Bound Plan.
- b) No systematic failures to proceed with implementation of the Time Bound Pan since first certified.
- c) The changes in the Time bound Plan for PT Mitra Austral Sejahtera was justified and appropriate.

BSI has continued involvement with assessments of Sime Darby Management Units during the 2014 period and beginning 2015. BSI is also communicating with other Certification Bodies that auditing Sime Darby's other operating units to identify any noncompliance with rules of partial certification as per requirement in RSPO Certification System. During this assessment BSI has contacted the certification body that audited PT MAS to get the latest update of the progress. Sime Darby consistently has kept BSI informed of any emerging issues and claims made against it. Other than the PT MAS issue, 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.

Time Bound Plan					
Requirement	Remarks	Compliance			
Summary of the Time Bound Pla	n				
Does the plan include all subsidiaries, estates and mills?	The time bound plan includes all SOUs in Malaysia and Indonesia. Malaysia- Effectively 34 SOUs: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. Indonesia- Effectively 25 SOUs. For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017.	Yes			
Is the time bound plan challenging? • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law.	Sime Darby Plantation's time bound plan for certification is initially 3 years, starting 2008 – 2011. SDP has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets). The 2 new mills have been RSPO Certified in Jan and Feb 2014. For Indonesian operations, currently, 1 SOU in Indonesia (PT MAS) is pending for RSPO Certification due to social legacy issues. SDP's is actively working on its certification targets given the span across a large geographical location and over 200 estates and mills in operation.	Yes			
Have there been any changes since the last audit? Are they justified?	97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes and a new oil mill in Liberia has been commissioned in Feb 2016. SDP's time bound plan has been revised to take into consideration the social challenges encountered in	Yes			



	Indonesia for the remaining SOU (PT MAS) yet to be certified. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter.	
If there have been changes, what circumstances have occurred?	Indonesia- PT MAS has undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO for Partial Certification and the report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. Ongoing and regular (bi-monthly) discussions is ongoing between Sime Darby Plantation and the project affected communities. Reports on the progress update are submitted to RSPO on a regular basis since November 2012. The latest progress report submitted to RPSO dated 30 th June 2016. Smallholders- As at June 2016, total of 24,820 Ha (59%) of total Ha, (42,008 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholders areas is on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2019. Liberia- A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.	Yes
Have there been any stakeholder comments?	Up to date, there is no comment. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.	Yes
Have there been any newly acquired subsidiaries?	In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified. A new mill has been set up in Liberia and planned for commissioning in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. *RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.	Yes



Have there been any isolated lapses in implementation of the	No lapses.	Yes
plan?		
Un-Certified Units or Holdings		
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Indonesia - PT Mitra Austral Sejahtera has undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO for Partial Certification and the report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. Reports on the progress update are submitted to RSPO on a regular basis since November 2012. The latest progress report submitted to RPSO dated 30th June 2016. Further details please refer to the RSPO Complaints Website: http://www.rspo.org/members/complaints/status-of-complaints/view/29 Liberia — New mill commissioned in Feb 2016, identification of gaps and preparation to meet the requirements of the RSPO P&C is in progress.	Yes
No replacement after dates defined in NIs Criterion 7.3: • 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.	HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).	Yes
Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14 ?	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.	Sime Darby (Liberia) Plantation Inc. Status: Box G - Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46 PT Mitra Austral Sejahtera (Sime Darby Sdn Bhd) Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/29	Yes



Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	No stakeholder comments or complaints received.	
Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	None noted. No stakeholder comments or complaints received.	Complied.

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 1st Annual Surveillance Assessment there were 3 (three) Major & 2 (two) Minor nonconformity raised. The Bukit Kerayong Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for it effectiveness and closed accordingly.

	Non-Conformity	
NCR #	Description	Category (Major / Minor)
1426255- 201701- M1	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
	Evidence of Nonconformity Bukit Kerayong POM and Bukit Cheraka Estate: There was sampled worker with Employee No. 6854 in Bukit Kerayong POM and in Bukit Cheraka Estate, there is total 10 contractor's workers were found without contract of employment. Besides, there were workers without extension contract of employment in Bukit Kerayong POM as below: a. Employee No.: 85351 who expired on 30/11/2015 b. Employee No.: 97974 who expired on 16/12/2016	
	Statement of Nonconformity Labour laws, union agreements or direct contracts of employment and extension contract 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.) was not implemented effectively.	



Corrective Actions

Root Cause:

- 1. Due to the changes of the staff during the merger, the employment of the contract (No 6854) was misplace.
- 2. Lack of supervision by the management on the contractor's workers that engage with the contractor.

Correction:

- 1. Mill management will prepare the contract employment (No 6854) immediately.
- 2. Estate management will instruct the contractor to provide the contract of employment. Estate will brief to the contractor and ensure all workers contractor will be provided with contract of employment and estate will kept the copy at estate office.

Corrective Action Plan (Long Term)

- 1. Mill management will ensure all the workers have contract of employment.
- 2. Estate management will ensure all contractors have contract employment between them prior work in the estate and get a copy of it.

Assessment Conclusion

The CAP and evidence has been submitted on 4/2/2017. However, an on-site visit was carried out on 14/4/2017 and evidence verified as below:

- a. Employment contract (No 6854).
- b. Employment contract for workers contractor (10 workers).
- c. Briefing session with contractor on 3/2/2017.
- d. Extension contractors for the workers were sighted.

Thus, the Major NC was closed on 14/4/2017.

	Non-Conformity	
NCR #	Description	Category (Major / Minor)
1426255- 201701- M2	Evidence of compliance with relevant legal requirements shall be available.	Major
MZ	Evidence of Nonconformity Document reviewed on the passport and permit of the contractor's workers found that 5 workers were without permit, 2 workers' permits were found expired on 12/9/2016 and 5/6/2016, and 2 workers were in the midst of application for permit on 24/11/2016.	
	Statement of Nonconformity	
	The management did not comply with Immigration Act 1959/63.	
	Corrective Actions	
	Root Cause:	
	Estate management not aware on the contractor's workers documentation.	
	Correction: Estate management will instruct the contractor to renew all their workers permit immediately.	
	Corrective Action Plan (Long Term):	



1.	Estate management will ensure that the contractor give a copy of their workers' work permit.
2.	Permit to work (PTW) will be issue by weekly basis.
Λο	sessment Conclusion
The	: CAP and evidence has been submitted on 4/2/2017. However, an on-site visit was
car	ried out on 14/4/2017 and evidence verified as below:
	a. Briefing session with contractor on 3/2/2017.
	b. Permit to work (PTW).
	c. "Surat Akuan Penerimaan" from Jabatan Imigresen.
	d. Termination letter dated 15/3/2017 from the management to terminate all
	the undocumented contractor workers in their plantation.
Thu	is, the Major NC was closed on 14/4/2017.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1426255- 201701- M3	Requirements Indicator 5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. Evidence of Nonconformity During the site visit it was found that: 1. Traces of oil inside the drains at the workshop area (BKPOM, BKE & BCE). 2. Traces of oil escaped from oil traps and flow into drain leading outside the estates (BKE & BCE). 3. Spillage of lubricants at the workshop lubricant storage area (BKPOM). 4. There is no bund to block any spillage from going out in case of accidental spillage at the workshop lubricant storage (BKPOM). Corrective action was not effectively implemented. Statement of Nonconformity Waste and pollutants was identified but implementation to avoid or reduce pollution is lacking. Corrective Actions Root Cause: 1. Insufficient of spill tray at workshop. 2. The oil trap is not regularly maintained. 3. Insufficient spill kits at lubricant store. 4. There is no bund to cater the oil spillage. Correction: 1. To clear the oil spillage immediately using spill kits 2. To purchase spill tray at workshop. 3. To provide spill kits at lubricant store. 4. Construct bund at the lubricant store.	Major
	Corrective Action Plan (Long Term):	



The oil trap will be maintained weekly basis by appointed person in charge. The Work Place Inspection (WPI) will be conducted quarterly basis.

Assessment Conclusion

The CAP and evidence has been submitted on 4/2/2017. However, an on-site visit was carried out on 14/4/2017 and evidence verified as below:

- a. Picture evidence, Before and After
- b. Purchase Order of spill trays
- c. Bund picture at the lubricant store (Mill)
- d. Housekeeping Schedule at workshop on daily basis.
- e. WPI checklist

Thus, the Major NC was closed on 14/4/2017.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1426255- 201701- N1	Requirements Indicator 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. Evidence of Nonconformity According to the Gender Committee Handbook, First Edition developed by PSQM Department, meeting shall be conducted on quarterly basis. However, it was only sighted one meeting was conducted during Y2016 which was on 9/9/2016 at Bukit Kerayong Estate and 14/11/2016 at Bukit Cheraka Estate. Statement of Nonconformity Gender committee meeting was not conducted as per the handbook developed by PSQM Department. Corrective Actions Root Cause: The arrangement of Gender Committee meeting does not follow the Gender Handbook. Correction: Estate management will conduct Gender Committee meeting on February 2017 together with Bkt Kerayong Est and Bkt Kerayong Oil Mill. Corrective Action Plan (Long Term): 1. To conduct training to the Gender Committee. Assessment Conclusion	Minor
	The continuous implementation of the corrective action will be verified during the next surveillance assessment.	

Non-Conformity		
NCR #	Description	Category



		(Major / Minor)
1426255- 201701- N2	Requirements Indicator 4.6.10 Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated.	Minor
	Evidence of Nonconformity During the site visit it was found that contaminated/used cloths/rags/ gloves were seen thrown inside the general rubbish bins (BKPOM, BKE & BCE).	
	Statement of Nonconformity The practice of reduce, reuse and recycle of materials was not effectively implemented. Corrective Actions	
	Root Cause: The waste does not properly handled by the workers.	
	<u>Correction:</u> Management will provide dedicated bin for contaminated/used cloths/rag/PPE.	
	Corrective Action Plan (Long Term): Estate will ensure there is no contaminated/used cloths/rag/PPE inside the general dustbin.	
	Assessment Conclusion The continuous implementation of the corrective action will be verified during the next surveillance assessment.	

	Observation		
OBS#	Description		
1	Nil		

Positive Findings	
PF#	Description
1	Good commitment from the management toward the certification.

Issues raised by Stakeholders

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

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. 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.

or externa	al stakeholder interviews. A list of Stakeholders contacted is included as Appendix E.
IS#	Description
1	Issues: Workers' Representatives – They informed that their pay were above Minimum Wage Order 2016. They were treated equally and distributed work without any discrimination. They are aware and understood on the complaint procedure.
	Management Responses: The management will strictly comply with the legal requirement and continually treat the workers fairly without any discrimination.
	Audit Team Findings: No further issue.
2	Issues: Gender Committee's representatives – They were reported that no sexual harassment and violence case report. They are understood on their rights and aware of no chemical handling if detected pregnant and during breast-feeding period.
	Management Responses: They will monitor closely if there is any case reported.
	Audit Team Findings: Document reviewed and interviewed with female workers confirmed that no case occurred.
3	Issues: Head of Village, Kg. Bukit Kerayong – He informed that the issues (flooding due to the trenches) raised during last assessment was completely resolved. No flood case was reported since the de-silting activity was done.
	Management Responses: The management has sent correspondence to Department of Irrigation and Drainage on 7/10/2016 to request for de-silting activity at the drainage to prevent flood during raining season.
	Audit Team Findings: Document reviewed on the management plan found that the management has incorporated the actions into the plan and completed the task by February 2016.
4	Issues: Headmistress, SJK(T) Ldg Brafferton – She informed that water supply to the school was insufficient where it only supplied about 30 minutes/ day. Besides, she requested the management to conduct fogging and grass cutting at the school compound.
	Management Responses: The management will conduct meeting with the headmistress to discuss on the issues arose and act accordingly.
	Audit Team Findings: Further verification during next surveillance audit.



3.3.1 Status of Nonconformities Previously Identified and Observations

	Non-Conformity	
NCR #	Description	Catgory (Major / Minor)
1288557M1	Requirements: Indicator 4.7.1 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
	Evidence of Nonconformity: Bukit Kerayong Mill: 1.) Permit to work (PTW) system & Contractor's Management (Referred PTW for confined space entry dated 16/2/15 (Contractor Solvetech) for boiler cleaning & overhaul work): No gas testing carried out by a competent AGT No cancellation of PTW after completion of work - No health declaration for those involved in confined space entry for the said date. 2.) Annual Personal Chemical Exposure Monitoring (PCEM) for N-hexane and Manganese was not carried out as per CHRA recommendation. Last PCEM was done in 23/3/2013. 3.) No Hearing Conservation Programme has been established for the workers who exposed to >85dBA noise as to date. Bukit Cheraka Estate: 1.) PPE compliance & monitoring/ Permit to work (PTW) system & Contractor's Management: Observed during site visit at field P15A, incomplete PPE worn by 4 contractor's workers (sprayers) which against the SDPSB Pictorial Safety Standard (PSS), for Spraying, 8.1 Personal Protective Equipment, rev:0 dated 17/3/08.	
	Statement of Nonconformity: Health and safety plan was not effectively implemented and monitored. Corrective Action: Bukit Kerayong POM has made arrangement with neighbour mill (Tennamaram) to use their competent AGT for gas testing. Competent AGT valid card (Reg. No.: NW-HQ-AGT-R-1203-M) valid till 25/8/2016 was submitted to the audit team. The mill has obtained the latest PTW that includes health declaration from DOSH website. It also engaged external consultant (ENV Consultancy & Monitoring) to conduct the Personal Chemical Exposure Monitoring (PCEM) for N-hexane and Manganese as per CHRA recommendation. Contract No.: 4300318678 dated 17/2/2016 was submitted to the audit team. Hearing Conservation Programme has been established for the workers who exposed to >85dBA noise as to date. As for Bukit Cheraka Estate, the management has issued stop work order dated 21st	
	Jan 2016 to the contractor due to incomplete PPE. Estate management also issued complete PPE to the contractor's workers and acknowledged by the workers. Permit to work system has been implemented to contractor and estate has conducted PPE	



awareness training on 11/2/2016 to all contractors' workers. All the relevant records were submitted to the audit team.

The Major nonconformity was closed on 20/3/2016.

Assessment Conclusion:

ASA1 1:

Competent AGT

Authorized Entrant & Standby Person For Confined Space NW-HQ-AE-R-1216-O (valid till 18/03/2018).

PTW

Permit to Work (PTW) has been implemented for internal and external works involving confined space, hot work, working at height, LOTO and etc. Monitoring of PTW for confined space entry, permit issuance and cancellation are effectively implemented.

PCEM

The personal and area chemical exposure monitoring was conducted on 23/02/2016 (EC/0216/6677) by JKKP HIE 127/171-3/1(206) for the laboratory was observed. The chemical exposure monitoring carried out at SOU7, n-Hexane exposure level to the personnel and area was below the PEL listed in Schedule I.

Hearing Conversation

Annual audiometric testing completed on 11/11/2016 by Procoma Environmental (M) Sdn Bhd, JKKP KES. 127/669/1(641). Total of 69 workers were sent for the annual testing. Baseline audiograms tested on 20 workers and Annual audiograms tested on 49 workers. Results found that a total of 09 workers are with hearing impairment-mild, 01 worker are with hearing impairment-moderate and 01 worker are with hearing impairment-severe.

The NC remained closed.

Non-Conformity		
NCR #	Description	Catgory (Major / Minor)
1288557M2	Requirements: Indicator 5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.	Major
	Evidence of Nonconformity: Bukit Kerayong Palm Oil Mill: Visit to the mill compound found traces of oil contaminates the water inside perimeter monsoon drain flowing out of mill compound.	
	Bukit Cheraka Estate: 1.) Visit to the general store found that few used empty printer cartridges were stored but not handled as Scheduled Waste as per Waste Management Plan.	



2.) Visit to the nursery found that agrochemical containers were used to store water for cleaning which is not following Waste Management Plan. There was a minor nonconformity raised against this indicator during the previous audit (ASA4).

Therefore, this nonconformity has been upgraded to Major as per RSPO certification system.

Statement of Nonconformity:

Implementation of pollution avoidance and reduction plan was not effective.

Corrective Action:

Bukit Kerayong POM has identified that the oil traces found are from workshop (leakages from vehicle parked for repair). The management has immediately cleaned the oil contaminated area, constructed an oil trap before final discharge and allocated designated area for vehicle repair.

Bukit Cheraka Estate has immediately transferred the empty cartridges to SW store and notifies DOE in eSWIS as SW417 (Ref. No.: 20162171PYXDAK) dated 17/2/2016. The estate also had immediately removed the reused agrochemical containers and replaced with new container for clean water supply. Additionally, PSQM-ESH executive has conducted Schedule waste refresher training for nursery sprayers and contractors sprayers on 11/2/2016.

The Major nonconformity was closed on 20/3/2016.

Assessment Conclusion:

ASA 1 1:

During the site visit it was found that: 1. Traces of oil inside the drains at the workshop area (BKPOM, BKE & BCE). 2. Traces of oil escaped from oil traps and flow into drain leading outside the estates (BKE & BCE). 3. Spillage of lubricants at the workshop lubricant storage area (BKPOM). 4. There is no bund to block any spillage from going out in case of accidental spillage at the workshop lubricant storage (BKPOM).

Corrective action was not effectively implemented. Please refer to the major NC no. 1426255_201701_M3 raised in ASA 1_1 .

Non-Conformity		
NCR #	Description	Catgory (Major / Minor)
1288557M3	Requirements: Indicator 5.6.2 Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimize them implemented.	Major
	Evidence of Nonconformity: Bukit Kerayong Palm Oil Mill: Continuous black smoke emission from the boiler stack sighted during the visit since the start of process in the morning until afternoon.	
	Statement of Nonconformity: Plans to reduce or minimise black smoke emission from boiler stack was not effectively implemented.	
	Correcive Action:	



Mill management has identified that inconsistent auto fuel feeding system which affects mixture of fibre & shell and draft setting contributed to black smoke output to atmosphere was the root cause. As immediate action, the mill has hired PCI Control Sdn Bhd. consultant on 22-23/1/2016 (report No.: MZH-2016/01-02) to calibrate the auto fuel feeding system and draft setting. The result shows observed black smoke has been reduced. As long term measure, the mill has budgeted to change the fire tube in the next financial year.

The Major nonconformity was closed on 20/3/2016.

Assessment Conclusion:

ASA1_1:

Further corrective action taken sighted during site visit was the mill was no longer operates the boiler (boiler no. 3) and reactivated the old boilers (boiler no. 1 & boiler no. 2). Verification with monitoring records (stack sampling analysis) shown emission

results were within regulation limit. Hence, NC remained closed.

	Non-Conformity	
NCR #	Description	Catgory (Major / Minor)
1288557M4	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
	Evidence of Nonconformity: Bukit Kerayong POM: During the document audit and interview with the workers on 19/1/16, it was found that RM 1.50 has been deducted from each local workers pay (sample checked: Employee No.: 6781, 6790, 67576) and this was reflected in their payslip for the month of November & December 2015. Further verification with the staff and executives found that there was no clear justification for the deduction made neither stated in their employment contract for the amount deducted.	
	Statement of Nonconformity: Deduction for electricity bill from workers' pay was not justified.	
	Corrective Action: The Mill management has identified that deduction of electricity for local has been made continuously from previous management without proper justification was the root cause. The management has immediately implemented the charge based on usage since all the houses were installed individual meters. Deduction list for the month of February submitted to the audit team found the deduction were made as per the usage (meter reading).	



Assessment Conclusion:

Verification during ASA 1 1:

During ASA 1_1 , the auditor has reviewed the contract of employment that signed by the workers had stated that the workers are required to settle the electricity bill according to the meter usage that had installed at individual house. Interviewed with workers confirmed that they were understood about the electric deduction in salary. Therefore, the implementation of the corrective action was found effective. The major NC remain closed during ASA 1_1 .

	Non-Conformity	
NCR #	Description	Catgory (Major / Minor)
1288557M5	Requirements: Indicator 4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.	Major
	Evidence of Nonconformity: Bukit Kerayong Estate: Medical surveillance programme was not established for the new trunk injector and sprayer with employee identification number: i)Trunk injector (72137) ii)Sprayer (80800, 83195, 108124) Bukit Cheraka Estate: Medical surveillance programme was not established for the nursery workers and contractor sprayers as per CHRA recommendation and the SDPSB Pictorial Safety Standard (PSS), for Spraying, 8.1 Work Force, rev:0 dated 17/3/08. i) Contractor's workers – sprayers (1 local, 1 Bangladeshi and 2 Indians) ii) Nursery workers (estate payroll workers)	
	Statement of Nonconformity:	
	Annual medical surveillance programme was not effectively conducted. Corrective Action: Both estate managements have immediately arrange for medical surveillance for all the workers highlighted including the contractor's workers at Clinic Kapar. OHD Doctor's reply letter dated 21/1/2016 stating the workers names examined and pending for the lab report was submitted to the audit team. The Major nonconformity was closed on 20/3/2016.	
	Assessment Conclusion:	
	ASA1 1: BKPOM	
	Last medical check-up was conducted on 09/01/2016 by DOSH Registered doctor No.: HQ/08/DOC/00/329 for 09 workers. Letter dated 18/01/2017 from Klink Kapar to confirm medical check-up conducted and on-going due to pending test reports. Medical surveillance reports to be verified during the next visit.	
	BKE Medical surveillance carried out once a year for all chemical handlers. Last medical check-up was conducted on 06/04/2016 by DOSH Registered doctor No.:	



HQ/08/DOC/00/329 for 37 workers. All 37 workers were found fit based on the medical results.	
BCE Medical surveillance carried out once a year for all chemical handlers. Last medical check-up was conducted on 06/05/2016 and 11/01/2017 by DOSH Registered doctor No.: HQ/08/DOC/00/329 for 33+10 workers. All 43 workers were found fit based on the medical results.	
The major NC remain closed during ASA 1_1.	

Non-Conformity		
NCR #	Description	Catgory (Major / Minor)
1288557M6	Requirements: Indicator 4.1.1 Standard Operating Procedures (SOPs) for estates and mills are documented. Evidence of Nonconformity: Bukit Cheraka estate: "Blanket Spray" has been carried out by the contractor's workers at field P15A which was under land preparation status for replanting. Further document verification found that the job awarded to the contractor clearly stated "Blanket Spray". However, this activity was not clearly stated / defined in the SOP (ARM and EQMS). Statement of Nonconformity: SOP for spraying activity during land preparation was not clearly documented. Corrective Action: The estate management has identified that misunderstanding of term used for "blanket spray" in daily communication, which actually referring to pre-emergence spray by the executives and staffs was the root cause of the issue. Definition of "Blanket Spray" by estate is meant for pre-emergence spray. However, it does not give absolute control of weeds. Therefore, for the maintenance of "clean" legume bands, limited manual weeding, use of selective post-emergence herbicide. The action taken implies to ARM Section 17 Leguminous cover crop establishment Sub-Section 7.3. The term stated in contract has been omitted as per standard referring to ARM. The Major nonconformity was closed on 20/3/2016. Assessment Conclusion: ASA1_1: Verification on-site and field visit confirm that there was no any blanket spray activities conducted anymore since it is not according to Sime Darby Plantation's Agricultural Reference Manual (ARM) practices. Hence, NC remained closed.	Major



Non-Conformity		
NCR #	Description	Catgory (Major / Minor)
1288557N1	Requirements: Indicator 5.6.3 A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.	Minor
	Evidence of Nonconformity: All operating units: No evident of reporting on progress of monitored GHG emissions to RSPO - ERWG as required by RSPO.	
	Statement of Nonconformity: Reporting on progress of monitored GHG emissions was not in place.	
	Corrective Action: Root Cause: PSQM was awaiting approval from Sime Darby GHG Calculator.	
	Correction: PSQM team has been notified on the pending matter. It was noted that PSQM was waiting for the RSPO ERWG personnel's approval on the Sime Darby GHG Calculator. PSQM will submit the GHG report to RSPO ERWG by end of February 2015.	
	Corrective Action: Mill will follow up with PSQM on the annual submission of GHG report to RSPO ERWG.	
	Assessment Conclusion: ASA1_1: The GHG calculations were done separately between the mill and estates. Based on records of email communication of Sime Darby's GHG person-in-charge, GHG report for 2015 has been submitted on February 2016. The data for 2016 still under collating and planned to be reported by end February 2017.	
	Hence the NC has been closed on 19/1/2017.	

Non-Conformity		
NCR #	Description	Catgory (Major / Minor)
1288557N2	Requirements: Indicator 6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and those efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.	Minor



Evidence of Nonconformity:

Bukit Kerayong Estate:

- 1) Feedbacks received from the head of village adjacent to the estate on the construction of security trenches by estate thought to be the cause of flooding within village during heavy rain.
- 2) Records shown limited evident of response has been maintained to requests/input by stakeholders.

Feedbacks received from neighbour plantation estate company stated that they have never been consulted and not aware on how to discuss an issue related to blockage of a drain.

Statement of Nonconformity:

- 1.) Construction of security trenches were not communicated and/or consulted clearly to ensure local communities and other interested parties understand the purpose.
- 2.) The list of stakeholders as well as communication and consultation mechanisms established does not effectively ensure engagement and/or collaboration with local communities and other affected or interested parties.
- 3.) Records of communication, including confirmation of receipt as well as response to requests were not fully maintained.

Corrective Action:

Root Cause:

- 1) No consultation with head of village adjacent to the estate on the construction of security trenches.
- 2) Estate management only reply with action taken as evidence to response. PIC is not officially reply by written to the stakeholder's request.
- 3) Lack of engagement with neighbor plantation management.

Correction:

- 1) Estate management meet head of village on 6th February 2016 to explain the real situation.
- 2) Reply to any pending request.
- 3) Estate pay a visit to introduce management of Bk Kerayong Estate.

Corrective Action:

- 1) Every action taken related to boundary will be discuss with neighboring stakeholder
- 2) Appointed PIC will reply every request by stakeholder through written.
- 3) Conduct stakeholder meeting periodically basis with neighbor plantation management.

Assessment Conclusion:

ASA 1_1

The management has appointed a Social Officer to handle any social issue raised by the stakeholders with the appointment letter dated 2/7/2016 as evident. Stakeholder meeting was conducted on 19/2/2016 with the participation of relevant stakeholders such as village's representative, neighboring plantation's representatives and etc. The flooding issue raised by the village's representative was discussed in the meeting and the management has explained the root cause to the stakeholders due to lack of de-silting activity by Department of Irrigation and Drainage. They have arranged with the relevant authority to resolve the issue on February 2016. Interviewed with



the relevant village's representative confirmed that no flooding was happened since	
then.	
Therefore, the Minor NC was closed during ASA 1_1 on 18/1/2017.	

	Non-Conformity	
NCR #	Description	Catgory (Major / Minor)
1288557N3	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. Evidence of Nonconformity: Bukit Cheraka estate: 1.) Spraying operation (field P15A) – Assigned trained first aider (mandore) was not present and first aid equipment was not made available at worksite. (contractor's work) 2.) Spraying operation (field P13B)– Incomplete content in the first aid box (only 10)	Minor
	items inside). One of the first aid item, eye drop was expired on Sept 2015. Statement of Nonconformity: Assigned trained first aider was not present on site and the first aid equipment was not effectively inspected and monitored. Corrective Action:	
	Root Cause: 1) The contractor not inform estate upon absent of their mandore. 2)No proper checklist form to monitor the content of the first aid items Correction: Already buy extra first aid boxes and will be given to the contractor's mandore. Refresher training will be given to the first aider by HA. First aid box checklist will be prepared to monitor the monthly refilling by the first aider.	
	Corrective Action: 1)Contractor to inform estate during muster in absent of trained first aider (mandore) and estate to standby for replacement. 2)Estate to develop first aid box checklist and to be provided to first aider. Any incomplete items to be reported to HA Assessment Conclusion: Assigned trained first aider was present in all sites visited and the firs aid equipment was sighted effectively inspected and monitored. Hence the NC has been closed on 19/1/2017.	



	Observation			
OBS#	Description			
1	Nil			

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
CR01	Major: 1.2.5	IAV: 31/07/2009	Closed on 20/09//2010
CR02	Major: 2.1.1	IAV: 31/07/2009	Closed on 03/01/2011
CR03	Major: 4.7.1	IAV: 31/07/2009	Closed on 03/01/2011
CR04	Major: 5.5.1	IAV: 31/07/2009	Closed 20/09/2010
CR05	Minor: 2.1.3	IAV: 31/07/2009	Closed on 20/09/2010
CR06	Minor: 4.4.6	IAV: 31/07/2009	Closed on 20/09/2010
CR07	Minor: 4.4.7	IAV: 31/07/2009	Closed on 20/09/2010
CR08	Minor: 4.5.4	IAV: 31/07/2009	Closed on 20/0/2010
CR09	Minor: 5.3.2	IAV: 31/07/2009	Closed on 20/09/2010
CR10	Minor: 5.4.2	IAV: 31/07/2009	Closed on 20/09/2010
CR11	Minor: 5.5.3	IAV: 31/07/2009	Closed on 14/04/2010
CR12	Major: 4.6.3	ASA1: 14/04/2012	Closed on 31/05/2012
CR13	Minor: 5.2.3	ASA1: 14/04/2012	Closed on 22/02/2013
CR14	Minor: 6.1.3	ASA1: 14/04/2012	Closed on 22/02/2012
A848470/1 (465344-1M)	Major: 4.6.5	ASA2: 22/02/2013	Closed on 05/04/2013
A848470/2 (465344-2M)	Major: 4.7.1	ASA2: 22/02/2013	Closed on 05/04/2013
A848470/3 (465344-3M)	Major: 4.8.1	ASA2: 22/02/2013	Closed on 05/04/2013
A848470/4 (465344-4M)	Major SCCS D.6	ASA2: 22/02/2013	Closed on 05/04/2013
A848470/1 (465344-1)	Minor: 5.3.2	ASA2: 22/02/2013	Closed on 19/02/2014
A848470/2 (465344-2)	Minor: 6.5.2	ASA2: 22/02/2013	Closed on 19/02/2014
1021303N3	Minor: 6.2.3	ASA3: 21/02/2014	Closed on 20/1/2015
1147372M1	Major: 2.1.1	ASA4: 23/1/2014	Closed on 22/3/2015
1147372N1	Minor: 6.5.3	ASA4: 23/1/2014	Closed on 20/1/2016
1147372N2	Minor: 5.3.3	ASA4: 23/1/2014	Upgraded to Major on 22/1/2016
1288557M1	Major: 4.7.1	RAV: 22/1/2016	Closed on 20/3/2016
1288557M2	Major: 5.3.3	RAV: 22/1/2016	Closed on 20/3/2016
1288557M3	Major: 5.6.2	RAV: 22/1/2016	Closed on 20/3/2016
1288557M4	Major: 6.5.2	RAV: 22/1/2016	Closed on 20/3/2016
1288557M5	Major: 4.6.11	RAV: 22/1/2016	Closed on 20/3/2016
1288557M6	Major: 4.1.1	RAV: 22/1/2016	Closed on 20/3/2016
1288557N1	Minor: 5.6.3	RAV: 22/1/2016	Closed on 19/1/2017



1288557N2	Minor: 6.2.3	RAV: 22/1/2016	Closed on 18/1/2017
1288557N3	Minor: 4.7.5	RAV: 22/1/2016	Closed on 19/1/2017
1426255-201701-M1	Major: 6.5.2	ASA1_1: 19/01/2017	Closed on 14/4/2017
1426255-201701-M2	Major: 2.1.1	ASA1_1: 19/01/2017	Closed on 14/4/2017
1426255-201701-M3	Major: 5.3.3	ASA1_1: 19/01/2017	Closed on 14/4/2017
1426255-201701-N1	Minor: 6.9.3	ASA1_1: 19/01/2017	"Open"
1426255-201701-N2	Minor: 4.6.10	ASA1_1: 19/01/2017	"Open"

Assessment Conclusion and Recommendation:

Based on the findings during the assessment Bukit Kerayong Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C 2013 (MY-NI 2014) and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of Bukit Kerayong Palm Oil Mill Certification Unit is approved and continued.

Acknowledgement of Assessment Findings	Report Prepared by
Name:	Name:
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Bukit Kerayong Palm Oil Mill (SOU 7)	
Title:	Title:
Mill Manager	Trainee Lead Auditor
Signatures: SIME DARBY PLANTATION SDN BHD KILANG KELAPA SAWIT BUKIT KERAYONG (647766-V)	Signature:
ANUAR BIN ZAKARIA Date: 23/5/2017 MILL MANAGER	Date: 15/5/2017



Appendix A: Summary of Findings

Criterion	/ Indicator	Assessment Findings	Compliance
Principle:	1: Commitment to Transparency		
Criterion	1.1:		
Growers ar	nd millers provide adequate information to	relevant stakeholders on environmental, social and legal issue	es relevant to
RSPO Crite	ria, in appropriate languages and forms to	p 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 -	Sime Darby Plantation Sdn. Bhd. has developed an External Communication Procedure dated 1/11/2008. 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. Restricted information such as account and cost data, personal privacy and etc are not allowed to be shared publicly. Stakeholders can access to the group's website (www.simedarby.com) or plantation's website (www.simedarbyplantation.com) to obtain information related to RSPO.	Complied
1.1.2	Records of requests for information and responses shall be maintainedMajor compliance	Records of external stakeholder requesting for information was recorded in the visitor book. For internal workers, the management has maintained individual file and request form to record any requests. The management has maintained a file to keep all the requests from the external stakeholders. Those requests were requested for contribution and donation from the company. The management has entertained the request by provided as per request.	Complied

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.



Criterion ,	/ Indicator	Assessment Findings	Compliance
1.2.1	Publicly available documents shall include, but are not necessary limited to: • 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). - Major compliance —	There was no restriction noted as to the documents made available to the public except private and confidential information. The public can browse through the internet to access to public information such as policies, corporate social responsibility and etc. Other than that, the policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.	Complied
Criteria 1.		husiness operations and transactions	
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	The mill and estate management have communicated the Code of Business Conduct to all the employees on 13/7/2015 – 10/8/2015. All the employees have signed on an acknowledgement letter stated that they will comply with the COBC requirement. For the new employees, they will be briefed during the induction training.	Complied
	2: Compliance with applicable laws	and regulations	
Criterion 2			
nere is co	mpliance with all applicable local, nationa	l and ratified international laws and regulations.	



	1			1
2.1.1	Evidence of compliance with relevant legal requirements shall be available Major compliance -	as per regulati sustaina	ad continued to comply with the legal requirements indicator. Compliance to each applicable law and on is monitored by the operating units and PSQM ability team. SOU7 had obtained and renewed license mits as required by the law.	Major nonconformance
		Sample	of licenses or permit viewed were:	
		BKPOM	<u>:</u>	
		1.	MPOB license: 562906004000 (validity period 01/08/2016 – 31/07/2017) for 180,000MT.	
		2.	DOE License: JPKKS/16/003124 (validity period 01/07/2016 - 30/06/2017).	
		3.	Diesel Permit # B020385, ref PKB2-PIN. 2/2012 BL2016065170 (18/12/2016 – 17/12/2017) Quantity: 15,000 liter.	
		4.	MOH Permit to Purchase, Store and Use of Sodium Hydroxide Serial : 043361 Register# : BC0049/2017 (validity period 01/01/2017 – 31/12/2017).	
		5.	Energy commission license no: 2016/01143; serial no: 00536 (validity period 25/05/2016 – 24/05/2017) for 2640 kW installation capacity.	
		6.	Electrical Charge-man A0, PJ-T-4-B-1382-2000.	
		7.	Steam Boiler and Steam Engine Driver	
			i. JKJ 18 – SL/104/90 (2 nd Grade)	
			ii. JKJ 18 – SL/08/Est/02/292 (2 nd Grade)	
		8.	Certificate of Fitness for Unfired Pressure Vessels:-	
			i. (JKT15-Pin. 1/87 PMT-SL 182927) - PMT 54717 (valid till 25/07/2017).	
			ii. (JKT15-Pin. 1/87 PMT-SL 182935) - PMT 24262 (valid till 25/07/2017).	
		9.	Certificate of Fitness for Steam Boiler:-	
			i. (JKT15-Pin. 5/87 PMD-SL 19258) - PMD 1266 (valid till 31/08/2017).	
		10.	Authorized Entrant & Standby Person For Confined Space NW-HQ-AE-R-1216-O (valid till 18/03/2018).	
		BKE:		
		1.	MPOB license: 525572002000 (validity period 01/01/2017 – 31/12/2017).	
		2.	Diesel Permit # B023687, ref B.PGK.SEL/00533 (02/11/2016 – 01/11/2017) Quantity: 10,000 liter.	
		3.	DOA Permit to Purchase of Acephate Quantity: 200kg Ref#: SEL/2017/ACP/001(GL) (validity period 03/01/2017 – 23/01/2017).	
		BCE:	. , , , , , , , , , , , , , , , , , , ,	
			MPOB license: 526188002000 (validity period 01/02/2017 – 31/12/2018).	
		2.	Diesel Permit # B022320, ref B.PGK.SEL/2018 (07/03/2016 – 06/03/2017) Quantity: 9,100 liter.	
		3.	DOA Permit to Purchase of Acephate Quantity: 1000kg Ref#: SEL/2017/ACP/0004(GL) (validity period 12/01/2017 – 01/02/2017).	



Criterion	/ Indicator	Assessment Findings	Compliance
		4. Document reviewed on the passport and permit of the contractor's workers found that 5 workers were without permit, 2 workers' permits were found expired on 12/9/2016 and 5/6/2016, and 2 workers were in the midst of application for permit on 24/11/2016.	
		Thus, a major non-conformity was raised.	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained Minor compliance -	SOU7 had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment.	Complied
		BKPOM - Bukit Kerayong Oil Mill LORR FY 2016/2017	
		BKE – SOU7 Bukit Kerayong Estate FY 2016/2017	
		BCE – Bukit Cheraka Estate FY 2016/2017	
		Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.	
2.1.3	A mechanism for ensuring compliance shall be implemented Minor compliance -	Evaluation of the legal requirements and compliance status with legal requirement are monitored by the operating units. BKPOM - Latest review was done on 06/07/2016. BKE - Latest review was done on 20/10/2016. BCE - Latest review was done on 06/07/2016.	Complied
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system to identify changes in the relevant regulations is available through the head office, website information and is communicated from the Group Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operation. Tracking system on any changes in the law had been well implemented.	Complied
Criterion 2			
	o use the land is demonstrated, and is no mary or user rights.	t legitimately contested by local people who can demonstrate	that they have
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 -	Bukit Kerayong Estate: Holds 21 freehold land titles. Sampled: Title# GRN 2416 (Sg. Kapar Div.), GRN 44392 (Bkt. Kerayong Div.), CT 6491 (Jln. Acob Div.). No restriction on land use term. Latest quit rent was arranged for payment on 7/1/2016.	Complied
		Bukit Cheraka Estate: Holds 105 freehold land titles. Sampled: Title# GRN 51701 (Bkt. Cheraka Div.), GRN 49449 (Bkt. Cloh Div.) and GRN 208275 (Braunston Div.). No restriction on land use term. Latest quit rent was arranged for payment on 3/1/2016.	



Criterion	/ Indicator	Assessment Findings	Compliance
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained Minor compliance -	Legal boundaries are clearly demarcated and visibly maintained throughout the estate. Mill is located inside the Bukit Kerayong Estate and sharing the estate boundary. All the boundaries are visibly maintained as per company SOP. Field visit for sampled boundary establishment sighted as following: i) Field P15C boundary to Kampung Bukit Kerayong (GPS coordinate N 03° 11′ 36.2″ E 101° 24′ 07.1″) ii) Field P08A boundary to Smallholder OP Estate (GPS coordinate N 03° 10′ 30.8″ E 101° 23′ 58.9″) iii) Field P13A boundary to Eng Soon (Private) Estate (GPS coordinate N 03° 10′ 26.4″ E 101° 22′ 10.1″)	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 Sime Darby and 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 Sime Darby and 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 Sime Darby and 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 Sime Darby and land ownership documents verified.	Complied
Criterion 2			
	· · · · · · · · · · · · · · · · · · ·	gal rights, customary or user right of other users without their	free, prior and
informed co		The actate lands are legally sweed and leased by the	
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. Interview with the surrounding communities and stakeholders confirm no disputes. Trenches were constructed to demarcate the boundary of the estate and the village.	Complied



Criterion	/ Indicator	Assessment Findings	Compliance
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	The estate lands are legally owned and leased by the company. Interview with the surrounding communities and stakeholders confirm no disputes. Trenches were constructed to demarcate the boundary of the estate and the village.	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 and leased by the company. Interview with the surrounding communities and stakeholders confirm no disputes. Trenches were constructed to demarcate the boundary of the estate and the village.	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 and leased by the company. Interview with the surrounding communities and stakeholders confirm no disputes. Trenches were constructed to demarcate the boundary of the estate and the village.	Complied
Principle 3	3: Commitment to long-term econor	nic and financial viability	
There is an	implemented management plan that aim	s 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 -	SOU7 had an annual budget for the financial year 2015/2016. The palm oil mill budget includes the projected FFB processed, CPO and PK production which projected for five years from 2016/2017 until 2020/2021.	Complied



Criterion	/ Indicator	Assessment Findings	Compliance
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	Annual replanting programme projected for a minimum of five years and yearly review conducted at the head office level and participated by the Regional GM and Estate managers. Replanting and immature checklist form R1.20 used for evaluating the replanting area. Review based on the replanting information form R1.10. Bukit Kerayong Estate: The previous replanting of 273.55ha was already completed during the visit. Next replanting will be in FY 2017/18 for a total of 176.45ha area. The long range replanting programme is available until 2037/38 FY. Bukit Cheraka Estate: No replanting done during the visit. Next replanting will be in FY 17/18 for 142.33 ha for P94A, P94B & P96B.	Complied
Principle 4	1: Use of appropriate best practices		
Criterion 4			
		, consistently implemented and monitored.	
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs: Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. Sime Darby SOP for estates (Estate Quality Management System – EQMS) issued 2/1/2008 and (Agricultural reference Manual - ARM) covers land preparation, planting material, upkeep, harvesting, transport etc.	Complied
4.1.2	A mechanism to check consistent implementation of procedures shall be in place Minor compliance -	External Mill Advisor and a Planting Advisor inspect and report on the operations on annual basis. The on-site managers develop Action Plans from the Advisory Reports for improvement of the operations. Review of Advisory Reports, Action Plans and site inspections confirmed consistent records of implementation of SOPs. During mill visit it was noted that that operating parameters were consistently recorded by the operators. Mill advisory visit - Report ref: SOU7/BKM/01/16-17 Date of visit: 10-11 August 2016 Rating given: PQR: 69 %, Safety: 70% There were other audits by PSQM and GCAD to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Latest internal audit visit was done on 18/11/2016.	Complied



Criterion /	Indicator	Assessment Findings	Compliance
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate Minor compliance -	The records of monitoring and the actions taken maintained for more than 12 months. Records were verified during the document review found compliance. Internal RSPO audit was conducted on 16-18/11/2015 by the RSPO & Certification Unit, PSQM. Bukit Kerayong Estate: PA visit: 7-13 Sep 2016 report No.: SOU7/BKE/01/2016-17 Agronomist: 10 - 11 May 2016 Bukit Cheraka Estate: PA visit: 10-13 Oct 2016 report #: SOU7/BCE/01/2016-17	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB) Major compliance -	Agronomist visited on 19-20 October 2016. No third party FFB received. All the FFB are from own certificate scope and adjacent Sime Darby certified estates.	Complied
Criterion 4		improve soil fartility to a lovel that ensures entimal and sustain	and viold
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 -	improve soil fertility to, a level that ensures optimal and sustain Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.	Complied
4.2.2	Records of fertiliser inputs shall be maintained Minor compliance -	The application of fertilizer has been recorded in the application program form. Fertilizer application was based on agronomist recommendation (2016/2017 Agronomic & Fertilizer Manuring Recommendation Report – Oil Palm Appendix 1) from his visit on 10-11 May 2016. Recommendation was made as following for sampled field 2001B of Bukit Kerayong Estate: • Sep – Oct 2016: N/K C2 (14:20) = 3.50kg/palm • Feb – Apr 2017: AS (21%N) = 2.25kg/palm • Feb – Apr 2017: AS (21%N) = 2.00kg/palm • May 2017: HGF Borate (48% B2O3) = 0.10kg/palm • Jun 2017: RP (28% P2O5) = 2.00kg/palm	Complied
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Sime Darby Seeds and Agriculture Services Sdn Bhd prepare the annual fertilizer recommendation. Leaf analysis result which shows the nutrient level was used as guidance for the fertilizer recommendation. Leaf sampling carried out on March 2015 by Sime Darby R&D Department personnel. Periodic soil sampling is carried out at 5 years interval. Last done for BKE was on 10/4/2014 (Test Report no.: S26/2014 dated 11/7/2014).	Complied
4.2.4	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 -	EFB application only applied to selected fields at the estates. Average about 45mt/ha EFB applied. Palm Oil Mill Effluent (POME) is applied to palms in furrows at Bukit Kerayong estate. Inspection of the area confirmed a well-managed system with two full-time operators in attendance continue to be employed.	Complied



Criterion	/ Indicator	Assessment Findings	Compliance
4.3.1	Maps of any fragile soils shall be available Major compliance -	All the estates hold copies of soil map. Soil maps and field visit confirm that there is no fragile soil on the estates.	Complied
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 -	Slope map available. Slope area constructed with terrace and side drainage. Planting terraces had been constructed where slope >10°. Fields are established with cover crops such as muccuna and soft grasses and ferns.	Complied
4.3.3	A road maintenance programme shall be in place Minor compliance -	Road maintenance program for BKE 2016/2017 sighted available. Sample, planned road maintenance for field 01A area was 36.06ha and completed 100% on December 2016. Road maintenance program for BCE 2016/2017 sighted available. Sample, planned road maintenance for field 06C area was 20.78ha and completed 100% on October 2016.	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 all estates visited.	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There is no peat soil.	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 soil categorised as problematic or fragile soil at all estates visited.	Complied



4.4.1	An implemented water management plan shall be in place.	<u>ВКРОМ</u>	Complied
	- Minor compliance -	Sighted an implemented plan established as Identification and Management of Waste Water FY 2016/2017 – SOU (7) Bukit Kerayong Oil Mill included the normal water usage	Complied
		mainly for process, cleaning & etc.	
		Mitigation plan identified: 1. Abnormal situation: drought season • Mill Reserved Water Tank • Water treatment plant • Rain-harvesting tank • Buy from JBA	
		 Abnormal situation: flood Desilting drain regularly Deepening and widening drains Evacuate to higher ground 	
		 Water reduction plan: Large containers at strategic locations to harvest rainwater Condensate water recycle Mill washing on weekend Station cleaning by swiping Inform workers during morning muster 	
		BKE Sighted an implemented plan established as Identification and Management of Waste Water FY 2016/2017 – SOU (7) Bukit Kerayong Estate included the normal water usage mainly for process, cleaning & etc.	
		Mitigation plan identified: 1. Abnormal situation: drought season • Waterways • Water catchment area • Rain-harvesting tank • Buy from JBA	
		 Abnormal situation: flood Desilting drain regularly Deepening and widening drains Shift OP seedling to secured area 	
		The Rainfall monitoring records (SOU7) Bukit Kerayong Estate was made available. The data shows an average rainfall from January 2016 till December 2016 at 179.33mm.	
		BCE Sighted an implemented plan established as Identification and Management of Waste Water FY 2016/2017 – SOU (7) Bukit Cheraka Estate included the normal water usage mainly for process, cleaning & etc.	
		Mitigation plan identified: 1. Abnormal situation: drought season • Waterways • Water catchment area	



Criterion	/ Indicator	Assessment Findings		Compliance
		Rain-harvesting to Buy from JBA 2. Abnormal situation: for Desilting drain recording and volume and to Shift OP seedling. The Rainfall monitoring recording was made available. The data so January 2016 till December 20	lood egularly videning drains g to secured area s (SOU7) Bukit Cheraka Estate shows an average rainfall from	
4.4.2	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 -	Documented as a Guidelines of (Management of River Reserved ated April 2014). Buffer zone River width > 40 meters 20 to 40 meters 10 to 20 meters 5 to 10 meters < 5 meters Monitoring based on Sustain System Appendix 7 Standard Ottaking water samples from st 2008, issue no. 1, dated 1/11/ The water sampling exercise water for domestic usage requout on quarterly basis (Januar following: BKPOM - Bukit Kerayong	Buffer zone 50 meters 40 meters 20 meters 10 meters 5 meters 10 meters 1	Complied
		monitoring before & after recodated 25/07/2016 by Sime Dar shown result was in compliance BKE - Bukit Kerayong Estate Report no. IE1115/2016 date Research Sdn. Bhd. Report shagainst the standard tested.	cords: Report no. IE701/2016 by Research Sdn. Bhd. Report he against the standard tested. he water analysis test report: d 21/10/2016 by Sime Darby	



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 -	Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD allowed by DOE was 5000mg/l through land application. Regular monitoring was conducted by the mill by taking the sample of waste water in final discharge point on monthly basis and water at the upstream, midstream and downstream of the river on quarterly basis. Sampled effluent monitoring records: Monthly Effluent Analysis Test Report no. IE701/2016 dated 25/07/2016 by Sime Darby Research Sdn. Bhd.; parameter monitored-: pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G. Samples were taken from each point of treatment in the system consist of raw pond, acid ponds, digester tanks and final pond before field application. BOD limit for final discharge <5000mg/L were met as well as all parameters	Complied
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	that were within allowable limit. Recorded in File no. 5. Mill water use per tonne of FFB monitoring done accordingly as following: Water used: Average water consumed for the period from Jul 16 – Dec 16 = 1.565m3/FFB processed.	Complied
Criterion of Pests, disease techniques.	ases, weeds and invasive introduced spec	ies are effectively managed using appropriate Integrated Pest	Management
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored Major compliance -	Similar to last assessment, the IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Barn owls Tyto alba has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 10ha. Plantation advisor report and Census records show that there is outbreak of leaf eating pest i.e bagworm. Chemical treatment being carried out with the approval from Agriculture Department. As biological control, beneficial plants are continuously being established along roadsides to attract natural predators with the ration of 2dm/ha. The estates have planted beneficial plants such as Cassia cobanensis and Turnera subulata and Antigonon leptopus . It was noted that the census interval for barn owl occupancy was as per Sime Darby SOP in Agricultural Reference Manual v.1 Section 15.	Complied
4.5.2	Training of those involved in IPM implementation shall be demonstrated Minor compliance -	IPM training is given by the Agronomist and plantation executives with qualification in agriculture. Interview with the bagworm census team confirm their understanding of the Sime Darby SOP in Agricultural Reference Manual v.1 Section 15 on census. IPM training covers bagworm and barn owl census, planting of beneficial plants etc. training provided by the R&D department on 17/11/2016, Attended by 24 personnel including managers, assistants, staff and workers.	Complied



Criterion	/ Indicator	Assessment Findings	Compliance
Criterion			
Pesticides	are used in ways that do not endanger he	ealth or the environment	
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 nontarget species shall be used where available. - Major compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue: 1 version: 3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease. Some of recommended pesticides are: Immature planting samples: General weeds: Glyphosate Legume & broad leave: Metsulfuron Methyl Stenochlaena palustris: Sodium chlorate Mature planting samples: VOPs: glyphosate & sodium chlorate The selection is also evaluated by the agronomist during his visit to the estate.	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 use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) were maintained.	Complied
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 Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.	Complied
4.6.4	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 -	Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. At the time of assessment, Class 1a chemical was no longer in use at Bukit Kerayong Estate for Bagworm treatment. Alternative class IA chemical, Acephate was used at Bukit Cheraka Estate. Permit to buy highly toxic pesticides regulations/ controlled pesticides. Acephate (class III chemical) Latest: SEL/2017/ACP/0001(GL), quantity: 200 kg, date of approval: 3/1/17. Permit validity 3-23 Jan 2017.	Complied



Criterion ,	/ Indicator	Assessment Findings	Compliance
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 -	Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers.	Complied
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
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spraying at SOU7.	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders at SOU7. Employees demonstrate knowledge and skills on pesticide handling. MSDS/SDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers.	Complied
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers a2.nd managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	BKPOM/BKE/BCE Disposal method of all identified waste was included in the pollution prevention plan. However during the site visit, contaminated/used cloths/rags/ gloves were seen inside the general rubbish bins. The practice of reduce, reuse and recycle of materials was not effectively implemented. Hence, the minor nonconformity was raised.	Minor noncompliance



/ Indicator	Assessment Findings	Compliance
Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	BKPOM Last medical check-up was conducted on 09/01/2016 by DOSH Registered doctor No.: HQ/08/DOC/00/329 for 09 workers. Letter dated 18/01/2017 from Klink Kapar to confirm medical check-up conducted and on-going due to pending test reports. Medical surveillance reports to be verified during the next visit.	Complied
	BKE Medical surveillance carried out once a year for all chemical handlers. Last medical check-up was conducted on 06/04/2016 by DOSH Registered doctor No.: HQ/08/DOC/00/329 for 37 workers. All 37 workers were found fit based on the medical results.	
	BCE Medical surveillance carried out once a year for all chemical handlers. Last medical check-up was conducted on 06/05/2016 and 11/01/2017 by DOSH Registered doctor No.: HQ/08/DOC/00/329 for 33+10 workers. All 43 workers were found fit based on the medical results.	
No work with pesticides shall be undertaken by pregnant or breast-feeding women Major compliance -	BKPOM/BKE/BCE The female workers confirmed knowledge of the policy of transfer to alternative duties if wished to continue working when pregnancy was confirmed or breast-feeding.	Complied
	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance - No work with pesticides shall be undertaken by pregnant or breast-feeding women.	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance - Major compliance - BKPOM Last medical check-up was conducted on 09/01/2016 by DOSH Registered doctor No.: HQ/08/DOC/00/329 for 09 workers. Letter dated 18/01/2017 from Klink Kapar to confirm medical check-up conducted and on-going due to pending test reports. Medical surveillance reports to be verified during the next visit. BKE Medical surveillance carried out once a year for all chemical handlers. Last medical check-up was conducted on 06/04/2016 by DOSH Registered doctor No.: HQ/08/DOC/00/329 for 37 workers. All 37 workers were found fit based on the medical results. BCE Medical surveillance carried out once a year for all chemical handlers. Last medical check-up was conducted on 06/05/2016 and 11/01/2017 by DOSH Registered doctor No.: HQ/08/DOC/00/329 for 33+10 workers. All 43 workers were found fit based on the medical results. No work with pesticides shall be undertaken by pregnant or breast-feeding women. No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major compliance -

Criterion 4.7:

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



Criterion /	Indicator	Assessment Findings	Compliance
place. A health and sai covering all activities s documented and imple	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.	SOU7 has maintained an approved Health and Safety Policy dated January 2015 that is displayed prominently on notice boards in English.	Complied
		Annual & Baseline Audiometric Testing	
	- Major compliance -	BKPOM - Annual audiometric testing completed on 11/11/2016 by Procoma Environmental (M) Sdn Bhd, JKKP KES. 127/669/1(641). Total of 69 workers were sent for the annual testing. Baseline audiograms tested on 20 workers and Annual audiograms tested on 49 workers. Results found that a total of 09 workers are with hearing impairment-mild, 01 worker are with hearing impairment-moderate and 01 worker are with hearing impairment-severe.	
		Chemical Health Risk Assessment (CHRA)	
		BKPOM - CHRA conducted on 21/05/2015 by registered assessor JKKP HIE 127/171-2(166). Based on the CHRA, a total of 07 findings/recommendations reported.	
		BKE - CHRA conducted on 03/08/2015 by registered assessor JKKP HIE 127/171-2(353). Based on the CHRA, a total of 08 findings/recommendations reported.	
		BCE - CHRA conducted on 06/08/2015 by registered assessor JKKP HIE 127/171-2(353). Based on the CHRA, a total of 08 findings/recommendations reported.	
		The action plan was established through the recommendation from the assessor.	
		Chemical Exposure Monitoring	
		BKPOM - The personal and area chemical exposure monitoring was conducted on 23/02/2016 (EC/0216/6677) by JKKP HIE 127/171-3/1(206) for the laboratory was observed. The chemical exposure monitoring carried out at SOU7, n-Hexane exposure level to the personnel and area was below the PEL listed in Schedule I.	
		LEV inspection and testing BKPOM - LEV inspection and testing was conducted on 15/06/2016 by registered assessor JKKP HIE 127/171-3/2(171). The LEV systems installed met the minimum required face velocity and duct transport velocity along the ducting and hoods.	
		Contractors Management BKPOM - Permit to Work (PTW) has been implemented for internal and external works involving confined space, hot work, working at height, LOTO and etc. Monitoring of PTW for confined space entry, permit issuance and cancellation are effectively implemented.	



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 -	SOU7 had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. Appropriate control measure has been determined and revised in the HIRARC register. BKPOM - HIRARC was reviewed on 04/07/2016 and approved by the Manager. Mill activities was identified and risk assessed with respect to FFB grading and sorting, FFB sterilization, kernel and oil extraction, oil clarification, maintenance activities at the workshop, working in confined space, working at height and hot work activities.	Complied
		At the estates, among the HIRARC carried out covered activities like chemical mixing and spraying, chemical storage, harvesting and FFB collection and vehicle maintenance. BKE - HIRARC was reviewed on 23/10/2016 and approved by the Manager. BCE - HIRARC was reviewed on 31/12/2016 and approved by the Manager. Revision done for cutting and stacking fronds due to accident reported.	



	/ Indicator	Assessment Findings	Compliance
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 -	Awareness and training program 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. 1. BKPOM Training Plan for FY 2016/2017 was established and approved. 2. Training Matrix 2016/17 SOU7 Bukit Kerayong Estate was established and approved by the Estate Manager. 3. Training Plan for FY 2016/2017 SOU7 Bukit Cheraka Estate was established and approved by the Manager. Suitable PPE has been provided to the workers based on the information in the MSDS and CHRA assessor's recommendation. List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities. 1. Boiler/Engine operator – Safety Helmet, Semi leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff. 2. Field workers (sprayer, manure & harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover. During the site visit, it was noted that the PPE will be replaced by the workers when damaged or lost. The chemical store was found to be adequately organized, properly labelled, secured and person in charge understands the OSH procedures. MSDS was placed at the chemical stores and is available. The person in charge understands the information written in MSDS.	Complied



Criterion	/ Indicator	Assessment Findings	Compliance
4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings between the	SOU7 OSH policy is well briefed to all workers. Interview with workers reveal that they understand the policy and the importance of safety at work.	Complied
	responsible person/s and workers. Concerns of all parties about health,	<u>BKPOM</u>	
	safety and welfare shall be discussed at these meetings, and any issues	OSH/ESH meeting conducted on quarterly basis and last meeting conducted on 04/11/2016 attended by 14 persons.	
	raised shall be recorded. - Major compliance -	The work place inspection conducted on 02/11/2016 and review of accident record was discussed during the OSH meeting. No any unresolved safety and health issues noted.	
		OSH Committee Members for 2016/2017	
		Chairman – Tuan Haji Annuar Bin Zakaria (appointment letter dated 30/06/2016). Appointment letters for other OSH committee members dated 01/07/2016 & 02/07/2016.	
		OSH/EHS meeting: 04/11/2016, 19/08/2016, 14/06/2016, 20/04/2016 and 17/02/2016.	
		<u>BKE</u>	
		OSH/ESH meeting conducted on quarterly basis and last meeting conducted on 09/11/2016 attended by 35 persons.	
		The work place inspection conducted on 05/10/2016 and review of accident record was discussed during the OSH meeting. No any unresolved safety and health issues noted.	
		OSH Committee Members for 2016/2017	
		Chairman – Tuan Amirudin Bin Said (appointment letter dated 21/10/2016). Appointment letters for other OSH committee members dated 02/07/2016 and 21/10/2016.	
		OSH/EHS meeting: 09/11/2016, 17/06/2016, 29/03/2016 and 21/12/2015.	
		<u>BCE</u>	
		OSH/ESH meeting conducted on quarterly basis and last meeting conducted on 09/01/2017 attended by 26 persons.	
		The work place inspection conducted on 04/01/2017 and review of accident record was discussed during the OSH meeting. No any unresolved safety and health issues noted.	
	,	OSH Committee Members for 2016/2017	
		Chairman – Tuan Kumaresh A/L Ragunanthan (appointment letter dated 01/07/2016). Appointment letters for other OSH committee members dated 01/07/2016.	
		OSH/EHS meeting: 09/01/2017, 07/10/2016, 22/07/2016, 15/04/2016 and 08/01/2016.	



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 -

Accident and emergency procedures have been communicated to employees, contractors and visitors.

- BKPOM Fire evacuation drill was last conducted on 18/11/2016 to test the state of readiness during emergency situation.
- BKE Fire evacuation drill was last conducted on 14/01/2016 to test the state of readiness during emergency situation.
- 3. BCE Fire evacuation drill was last conducted on 14/10/2016 to test the state of readiness during emergency situation.

Accident and emergency procedures are in Bahasa Malaysia and this is understood by the responsible workers, staff or executives involved in the operation. Good understanding level observed among the workers.

- Training for First Aid is conducted in annually. Sufficient first aiders trained.
- 2. First aid equipment is available at worksites. During the site visit there is evident that First Aid Box is available at the relevant area with sufficient contents and in good condition.
- Fire extinguisher (ABC Powder) assessed during the site observation are available and within the expiry date.
- Portable emergency eye wash facility available at chemical store and laboratory. Both are in good working condition.

Quarterly review on accident cases carried out during OSH quarterly meeting.

BKPOM

02 accidents reported. JKKP 6 was sent to DOSH on 18/04/2016 & 13/06/2016. JKKP 8 was sent to DOSH on 06/01/2017.

DOSH visits (15/07/2016) been recorded in the DOSH log book and comments highlighted by DOSH was noted and action taken accordingly.

BKE

46 accidents reported. JKKP 8 was not sent to DOSH (as of 18/01/2017) but will submit to DOSH in the month of January 2017. Submission to be verified during the next visit.

DOSH visits (12/01/2016) been recorded in the DOSH log book and comments highlighted by DOSH was noted and action taken accordingly.

BCE

30 accidents reported. JKKP 8 was not sent to DOSH (as of 19/01/2017) but will submit to DOSH in the month of January 2017. Submission to be verified during the next visit.

Complied



Criterion	/ Indicator	Assessmen	t Findin	gs			Compliance			
			mments	highli		d in the DOSH log SH was noted and				
4.7.6	All workers shall be provided with medical care, and covered by accident insurance.		file record	ds fou		yees. Reviewed on orkers are covered	Complied			
	- Minor compliance -		Keselam	atan S	Sosial). Refer t	OCSO or Perkeso to form 8A, "Jadual				
					overed by ificate of Insu					
		Insurance		Period		Remark				
		RHB Insura (FW187065		09/07, 08/07,		ВКРОМ				
		RHB Insura (FW187959		20/07, 19/07,		ВКРОМ				
		RHB Insura (FW180177		12/02, 11/02,		BKE				
		RHB Insura (FW184514		21/04, 20/04,		BKE				
		RHB Insura (FW144905	5)**	30/06,	/2016	BCE	ı			
		**BCE had requested for a copy of the FWCS policy (certificate 01/07/2016 – 30/06/2017) and are waiting for reply from Head Office. Cited email correspondence dated 16/11/2016.								
4.7.7	Occupational injuries shall be recorded using Lost Time Accident	Accident records are found to be updated. All records on Lost Time Accident (LTA) metrics are maintained.				Complied				
	(LTA) metrics - Minor compliance -	Samples of a	accident s	statisti	c as shown be	elow:				
		Year	BKPON	М	ВКЕ	BCE				
		to-date								
		2015	1 (LTA	52)	49 (LTA 63)	28 (LTA 91)				
		2016	2 (LTA	12)	33 (LTA 191) 30 (LTA 118)				
		*LTA is equivale	ent to lost m	nan days	(MC)		1			
		BKPOM recorded LTI as at January 2017 – 267,072.								
		BKE recorded	d LTI as a	at Janı	uary 2017 – 9	85,328.				
		BCE recorded	d LTI as a	at Janı	uary 2016 – 9	97,740.				



Criterion ,	Indicator 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 -	SOU7 has est covers all aspet Bukit Cheraka Implementation Training Nee 28 training nee FY2016/2017 units	Complied		
		A formal training and Criteria he training need a verification at a			
4.8.2	Records of training for each employee shall be maintained Minor compliance -	the office. Rec covers all asp Samples of tra	ds for employees available cords are verified on a salect of training and RSPC ining record for 2016 as f	ampling basis which P&C requirement.	Complied
		<u>BCE</u>			
		Date	Training	Trainer	
		16/01/2017	COBC Briefing - Workers	Tn Md Amiruddin	
		12/01/2017	RSPO/HCV Training	Tn Anuar	
		11/01/2017	Commuting Safety	Tn Kumaresh	
		19/12/2016	Waste & Risk Management Project Workshop	PSQM ESH	
		25/10/2016	CPR & OSH First Aid Training	PSQM ESH	
		14/10/2016	Fire Drill Training	PSQM ESH	
		09/08/2016	MAPA Training	PSQM ESH	
		19/02/2016	Refresher Training for Frond Stacker	Tn Basu Amil	
		Records verified visited covers of training cone Hearing cone TPM Process	ning for employees availated on a sampling basis at all aspect of training and ducted for FY15/16 and Fervation training (3/11/2 control training (14/10/2 cupational First Aid Training	the Mill and estates RSPO P&C. Samples FY16/17 as follows: 2016)	

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.



(EIA) shall be documented. environmental impacts base - Major compliance - • Appendix 5.4.1b	act assessments relating to ed on documents as following: - Environmental Aspect and	Complied
Issue no. 1; Dated Appendix 5.4.1c Impact Identificati Issue no. 1; Dated Appendix 5.4.1d Evaluation form, Vo Dated 1 April 2009	Procedure, Version 1; Year 2008 1 1 April 2009; Register - Environmental Aspect and ion form, Version 1; Year 2008 1 1 April 2009; MR-01/EAI 1 — Environmental Impacts Version 1; Year 2008 Issue no. 1; D; MR-02/EIE	
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 - The mill and estates has annual programs that we individual Pollution Preventimes an agers of mill and estates charge of the programs while of the aspect and impact rereviewing and updating on the three's no any new activities. Review of aspect and infollowing: BKPOM Environmental Aspect Identification (EIE) reviewed Neither any change to curriculation (EIE) reviewed Neither any change to curriculation with including weighbridge ope water and waste water treating the mill other including to the environment and the	iffication (EAI) and Environmental and updated on 06/07/2016. The operation nor new activity for than normal mill operation eration, process, maintenance, forment. Impact Identification and a on 20/10/2016. No any changes intal aspects and impacts. Impact Identification and a on 23/07/2016. No any changes intal aspects and impacts. Impact Identification for various rk, compound, dispensary, field, main entrance, pest and disease power station, replanting, road,	Complied



Criterion	/ Indicator	Assessment Findings	Compliance
5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -	 Boiler stack sampling records: Air Emission Monitoring for Boiler no. 2 & no. 3 on 10/11/2016 by Procoma Environmental (M) Sdn. Bhd. (Report ref. # PR16-ISS-0107). Result shown the stack emissions particulates are within limit at 62.585 mg/m³ for boiler no. 2 and 14.27 mg/m³ for boiler no. 3. Online scheduled waste inventory & consignment – updated as of 17/1/2015 where the quantity and storage period were within allowable limit. Latest Scheduled Waste disposal was done on 7/10/2016, consignment # 201610070708CRXDB9 for SW 409, # 2016100708OD9NQ (SW 322), # 20160809171FMATX (SW 305) by Tex Cycle (P2) Sdn. Bhd. 	Complied
The status or that cou	of rare, threatened or endangered specie	es and other High Conservation Value habitats, if any, that exist gement, shall be identified and and operations managed to bes	
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscapelevel considerations (such as wildlife corridors). - Major compliance -	Ecologist from the PSQM team conducted initial HCV assessment of the possible presence of HCVs within and adjacent to the estates in 2009. BSI audit team already assessed the HCV assessment in 2009 during the initial certification of the supply base. HCV Toolkit for Malaysia by WWF – Malaysia was used for the HCV assessment. Reassessment of Biodiversity has been conducted on December 2015 by Social & Environment Projects Units (PSQM). There was an appropriate consultation process for identification, management and monitoring of HCVs. Conservation area is maintained mainly water-log and steep area. At Bukit Cheraka Estate, slope area of 55.52 ha which is more than 25 degree has been maintained as Biodiversity area (HCV 4).	Complied
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	There is no any ERT identified within the plantation. There is no ERT in the conservation area. Boundary of Forest reserve were monitored and maintained. Common species found in the conservation areas are long tail monkeys, wild boar (Sus scrofa), Black Cobra (naja sp.) and monitor lizard.	Complied
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Signage as well as routine patrolling activities were utilised as part of creating awareness among employees and maintain at biodiversity areas. Other action plan including the involvement of PSQM department of HQ to develop poster/booklet/brochure related to environment conservation and to have consultation/collaboration with environmental NGO/government agency/research institute to enhance on biodiversity findings. On-going company-wide program related to biodiversity is the South East Asia's Biggest ERT (Endangered, Rare and Threatened) Tree Collection by 2018 through its "Plant-A-Tree" Program at Jentar Estate, Pahang. Program was launched since February 2013 and expected to achieve 160,000 forest trees by its ending in 2018.	Complied



Criterion ,	/ Indicator	Assessment Findings	Compliance
5.2.4	Where a management plan has been created there shall be ongoing monitoring: • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	The management plan of monitoring plan for FY 16/17 was be prepared on the 1/7/16 by assistant and approved by manager. The plan includes monitoring of buffer zone area and conservation area in the estate and surrounding area. Regular patrolling by estate security personnel together with forestry officers was done.	Complied
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	There was no HCV set-aside that needs any negotiation process with the local communities	Complied
Criterion !			
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	in an environmentally and socially responsible manner. Waste sources have been identified accordingly by both the mill and estates. Documentation was done as a waste management plan which was being reviewed by respective operating units on annual basis. Visits made to Bukit Kerayong Mill together with Bukit Kerayong and Bukit Charaka estates showed that all waste.	Complied
		Kerayong and Bukit Cheraka estates showed that all waste products and sources of pollution were identified and documented. The documentation and identification of all the waste products such as scheduled waste, domestic waste and recyclable waste such as metal, plastic, mill waste and polluting materials e g. EFB, POME, Stack emissions and Boiler ashes were maintained and monitored at the Mill. The aspect identifications were tabulated in SB/5.2/EAI and impacts evaluations were tabulated in SB/5.2/EIE.	
		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 accordingly. Sampled record verified at Bukit Cheraka Estate: • Online scheduled waste inventory & consignment – updated as of 17/1/2017 where the quantity and storage period were within allowable limit. Latest Scheduled Waste disposal was done on 7/10/2016, consignment # 201610070708CRXDB9 (SW 409), # 2016100708OD9NQ (SW 322) and # 20160809171FMATX (SW 305) by Tex Cycle (P2) Sdn. Bhd.	



Criterion ,	/ Indicator	Assessment Findings	Compliance
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	Based on policy to reduce, reuse and recycle, the management of used chemicals and containers were done in accordance Scheduled Waste regulations.	Complied
		For estates, the empty pesticides container were collected in scheduled waste store after being triple rinsing and punctured at the bottom of the container.	
		Stores for scheduled waste were inspected at audited sites in mill and estates and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.	
		The mill and estates also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.	
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	During the site visit it was found that:	
		1. Traces of oil inside the drains at the workshop area (BKPOM, BKE & BCE).	Major nonconformance
		2. Traces of oil escaped from oil traps and flow into drain leading outside the estates (BKE & BCE).	
		3. Spillage of lubricants at the workshop lubricant storage area (BKPOM).	
		4. There is no bund to block any spillage from going out in case of accidental spillage at the workshop lubricant storage (BKPOM).	
		Due to recurrence of the issue, it was substantiated that the corrective action was not effectively implemented. Hence, major non-conformity has been re-issued.	



Criterion	/ Indicator	Assessment Findings	Compliance
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of grid electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler. The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis. Monthly records of energy consumption of non-renewable and renewable fuel per metric tonne of palm product at the Mill were available. At the estates, diesel consumption per metric ton FFB was also monitored on a monthly basis. It was verified that energy usage are being monitored at the operating units for better control and comparison of trends. Sampled monitored diesel usage as following:	Complied
	for preparing land or replanting is avoide	Bukit Kerayong Estate: Jul 16 – Dec 16 = 1.92Liter/mt FFB produced d, except in specific situations as identified in the ASEAN guidel	ines or other
regional be 5.5.1	St practice. There shall be no land preparation by	The Group policy of "Zero open burning" is enforced since	
J.J.1	burning, other than in specific	July 2008. The operating units adhere to the policy of "Zero	
	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 - Where fire has been used for	open burning" for any replanting, if any, in the estates. Field inspections made in Bukit Kerayong and Bukit Cheraka estates field showed no evidence of open burning.	Complied



Criterion	/ Indicator	Assessment Findings	Compliance
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 -	Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment in line with Sime Darby Plantation Carbon Policy – to reduce carbon emissions by 40% from 2009 levels by year 2020 signed by Managing Director on January 2015). Sampled assessment sighted as following: Boiler stack sampling records: Air Emission Monitoring for Boiler no. 2 & no. 3 on 10/11/2016 by Procoma Environmental (M) Sdn. Bhd. (Report ref. # PR16-ISS-0107). Result shown the stack emissions particulates are within limit at 62.585 mg/m³ for boiler no. 2 and 14.27 mg/m³ for boiler no. 3.	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented Major compliance	Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH) emission through POME treatment as well as boiler stack from the mill. Other less significant GHG emissions identified including CO _X , SO _X and NO _X from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Monitoring of the GHG quantity was done through its licensed GHG calculator, "SD-Global Plantation Carbon Inventory Calculation Methodology calculator" where annual quantification of all GHG sources was input into the calculator. Default values of emissions factor Calculation of the GHG emissions were derived from publicly available sources including IPCC. These calculations were reported to RSPO-ERWG for confirmation of acceptance of calculation method. The GHG calculations were done separately between the mill and estates. Data for 2016 still under collating and planned to be reported by end February 2017.	Complied
millers. Criterion Aspects of plans to mi continual ir	6.1: plantation and mill management that hav tigate the negative impacts and promote approvement.	e social impacts, including replanting, are identified in a particithe positive ones are made, implemented and monitored, to de	patory way, and
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	A Social Impact Assessment was conducted on 2-4/11/2015 by the Social & Environment Projects Unit from PSQM Department which covered Bukit Kerayong POM, Bukit Kerayong Estate and Bukit Cheraka Estate. The methodology of the assessment was by field observation, interview with the stakeholders and document reviewed. Attendance list was sighted with the participation of relevant stakeholders such as villagers, government authority, internal workers and etc.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The assessment was conducted with the participation of relevant stakeholders such as neighbouring villagers, government authority, contractors and suppliers, internal workers and etc. Attendance list of the stakeholders was sighted.	Complied



Criterion /	/ Indicator	Assessment Findings	Compliance
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	The mill and estates have developed Social Management Action Plan 2016/2017 and the plan has few highlights with the action steps to be taken to resolve the issues. The plan has incorporated person in charge of the issue and the date of completion. The estate's management has incorporated the issues raised by the stakeholders during SIA assessment into the plan such as the flooding and cattle's issues. The management has taken action to mitigate the issues. Evidence of stakeholder meeting minutes and correspondence to the authority was sighted.	Complied
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 plan was reviewed on yearly basis and the last review was conducted on July 2016 for Y2016/2017.	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 smallholder scheme was involved in the certification units.	Not applicable
Criterion 6	5.2:		
	pen and transparent methods for commu ffected or interested parties.	unication and consultation between growers and/or millers, loca	al communities
6.2.1	Consultation and communication procedures shall be documented Major compliance -	Sime Darby Plantation Sdn. Bhd has established a flowchart and procedures on Handling Social Issues dated 1/11/2008. Besides, a procedure for external communication with Doc. Ref. No. SubSection 5.5 Appendix 5.5.3.2 dated 1/11/2008 was developed. The procedure has detailing the process if there is any communication involved from the external stakeholders. The timeframe for external communication to be required feedback is within 2 weeks from the date of receipt.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Assistant Engineer (mill) and Senior Assistants (estates) were appointed by the Manager to be the Social Officer to handle any social related matters. Appointment letter dated 2/7/2016 was sighted	Complied



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 -	The mill and estate's management have developed a list of stakeholder which included contractors and suppliers, neighbouring villagers, government authorities and etc. In Bukit Kerayong Estate, stakeholder meeting was conducted on 19/2/2016 with participation of external stakeholders such as local communities, school representatives, mosque's representative, representative from neighbouring plantation and contractors. The local villager has reported that the estate's activities caused flood in the village area. However, the management has informed the villager that the root cause of the flooding is due to lack of de-silting activity carried out by Department of Irrigation and Drainage (DID). After all the de-silting activity was carried out by DID, it was no flooding reported by the villagers. Interviewed with the representative from the village confirmed that no issue of flood even after heavy rain. In Bukit Cheraka Estate, stakeholder list was updated on 13/1/2017. A stakeholder meeting with cattle's owners was conducted on 22/7/2016 to discuss issue related to the scattered cattle around the area.	Complied
Criterion (5.3:		
	mutually agreed and documented system	for dealing with complaints and grievances, which is implemen	ted and accepted
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 -	Sime Darby Plantation Sdn. Bhd has established a flowchart and procedures on Handling Social Issues dated 1/11/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	Mill and estates' management have implemented "House Repair Form" and Complaint book for the internal workers to lodge complaints related to housing issue. The management has taken action to resolve issues raised by the workers and acknowledged by the workers was sighted after the action taken. No pending issue was found. Besides, the management has also implemented a complaint form for customer. However, no complain was recorded up-to-date.	Complied
	ations concerning compensation for loss of sindigenous peoples, local communities of the state o	of legal, customary or user rights are dealt with through a docu and other stakeholders to express their views through their ow	
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 -	Sime Darby Plantation Sdn. Bhd. has developed a procedure and flowchart for handling boundaries disputes dated 1/11/2008. The purpose of the procedure is to explain and identify the customary land or any social land dispute reported by the people. Negotiation process was involved and compensation is required to the local communities for the loss of land rights. The Land Management Department was the one who determine the calculation and distribution of compensation to the affected parties.	Complied



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 -	As per the above 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 to date.	Complied
		orkers always meet at least legal or industry minimum standar	ds and are
6.5.1	Documentation of pay and conditions shall be available Major compliance -	The mill and estates consist of local workers, foreign workers and contractor's workers. The management has included basic pay, net pay, gross pay, deduction of salary, phone allowance, holiday pay and etc on the pay slip. Payslip of month October to December 2016 for workers have been sampled as below: a) Employee No.: 6854 (BKPOM) b) Employee No.: 85351 (BKPOM) c) Employee No.: 93046 (BKPOM) d) Employee No.: 6782 (BKPOM) e) Employee No.: 118866 (BKE) f) Employee No.: 11848(BKE) g) Employee No.: 110448(BKE) h) Employee No.: 96870(BKE) i) Employee No.: 110924(BCE) j) Employee No.: 126762(BCE) l) Passport No.: AR 296313 (Contractor's Worker BCE) m) Passport No.: AR 296312 (Contractor's Worker BCE) All the sampled workers below were achieved Minimum Wage Order 2016 of RM 1000/ month or RM 38.46/ day.	Complied



Criterion / Indicator	Assessment Findings	Compliance
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 -	Employment contract are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, transportation provided, holiday and annual leave, termination of services and etc. The contract was signed by the workers and sampled contracts as below: Bukit Kerayong POM: a. Employee No.: 125481 b. Employee No.: 128980 Bukit Kerayong Estate; a. Employee No.: 122905 b. Employee No.: 125779 Bukit Cheraka Estate: a. Employee No.: 125779 Bukit Cheraka Estate: a. Employee No.: 126903 b. Employee No.: 126762 Extension contracts were signed by the workers who have worked more than 3 years. Sampled workers as below: a. Employee No.: 55385 (BKPOM) b. Employee No.: 93046 (BKPOM) c. Employee No.: 110448 (BKE) d. Employee No.: 110449 (BKE) e. Employee No.: 94672 (BCE) g. Employee No.: 94672 (BCE) g. Employee No.: 3969 (BCE) However, there are a sampled worker with Employee No. 6854 in Bukit Kerayong POM without contract of employment and in Bukit Cheraka Estate, there is total 10 contractor's workers were found without extension contract in Bukit Kerayong POM as below: a. Employee No.: 85351 who expired on 30/11/2015 b. Employee No.: 97974 who expired on 16/12/2016 In the mill, deduction of salary was made towards the workers for temple/mosque fund, electricity bill, advance, NUPW subscription fee and etc. The workers have signed consent letter to authorize management to deduct RM 5 for the mosque fund and RM 15 for temple fund. Sampled consent letters were sighted. For the electricity usage, according to their contract signed under Clause 7.6, the workers have to settle the bill based on the meter reading.	Major nonconformance



Criterion	/ Indicator	Assessment Findings	Compliance
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance —	The workers were provided with free housing facilities and water supply. Electricity was supplied by TNB and the workers will settled the bill according to the meter usage. The management provided free medical assistance to all the workers. There are school nearby where the children are easily access to attend the school.	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 —	There are small town or village nearby the mill and estates which allowed the workers to access to adequate and sufficient of foods easily. Interviewed with the workers found that they will go to the town to purchase foods and goods.	Complied
right to free	ver respects the rights of all personnel to	form and join trade unions of their choice and to bargain collections are restricted under law, the employer facilitates parallel numbers all such personnel.	
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	SDPSB has implemented Social Policy dated January 2015 where the management is committed and respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively.	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented Minor compliance -	An annual Union meeting was conducted with the participation of the representatives from the management and the Union's representatives. The meeting was conducted on 29/12/2016 in the mill and 4/1/2016 in the Bukit Kerayong estate. Meeting minutes is sighted and no issue has been raised during the meeting. Union meeting was conducted on 15/4/2016, 22/7/2016, 7/10/2016 and 9/1/2017 in Bukit Cheraka estate. Interviewed with the Union's representative found that the issue raised during last meeting was in the progress of resolving. They have no issue on the pay and housing condition.	Complied
Criterion			
Children and	e not employed or exploited. There shall be documentary evidence that minimum age requirements are met. - Major compliance -	The company has developed Child Protection policy, Social & Humanity Management policy and Social policy dated January 2015 which they are committed not to employ children who are underage. Operating units are complied with the minimum age requirement. No employees below the age of 18 were sighted through the master list of active employee list. The youngest employee was 20 year old.	Complied
•		ional origin, religion, disability, gender, sexual orientation, unic	n membership,
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	SDPSB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.	Complied



Criterion /	/ Indicator	Assessment Findings	Compliance
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 -	Through document reviewed on the list of employees found that there was a composition of local and foreign workers, male and female workers. No discrimination was sighted based on interview with the workers. The management treated all the workers fairly and equally without discrimination.	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 -	Sime Darby Plantation Sdn. Bhd. has implemented a "Sourcing Process for Foreign Workers (Peninsular Malaysia)" which detailing the process of recruitment of the foreign workers. They were recruited by the agent based on availability of the vacancy. The management will first posted the vacancy for local people before recruited for foreign workers. The recruitment was based on skills, capabilities, qualified and etc.	Complied
Criterion (
There is no 6.9.1	harassment or abuse in the work place, 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 -	and reproductive rights are protected. Sime Darby Plantation Sdn. Bhd. has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015. The management is committed to prevent any form of sexual harassment and violence occurred in the workplace. The policy was communicated to employees during morning muster.	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 -	Sime Darby Plantation Sdn. Bhd. has implemented Social Policy and Social & Humanity Management Policy dated January 2015. The management is respected and protected the reproductive rights of the female employee. The mill management has issued a memo on 1/7/2015 related to "no work with pesticide for confirmed pregnant and breast-feeding women". The policy was communicated to employees during morning muster.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	A Gender Committee was established by the mill and estates' management. The purpose of the establishment of the committee is to protect and respect the complainants if there is any issue reported. A sexual harassment complaint procedure was developed which explained the process if there is any case reported. Meeting was conducted 17/11/2016 at the mill, 9/9/2016 at Bukit Kerayong Estate and 14/11/2016 at Bukit Cheraka Estate. Meeting minutes was sighted. During the meeting, the committee has discussed if there is any issue related to sexual harassment and violence occurred. Through interview with the female workers and staffs confirmed that no sexual harassment case was reported.	Minor nonconformance
		According to the Gender Committee Handbook, First Edition developed by PSQM Department, meeting shall be conducted on quarterly basis. However, it was only sighted one meeting was conducted during Y2016 which is not according to the handbook's requirement.	
		Therefore, a minor non-conformity was raised.	1



/ Indicator	Assessment Findings	Compliance
Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable because the FFB sourced is from own company estates.	Complied
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 -	There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable because the FFB sourced is from own company estates.	Complied
Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Contractor's contract agreement was signed by the contractors before the commencement of work. Sampled contract as below: a. Tender Ref. No.: SCWZ/TD/0006/15/16-BKOM for grass cutting activity in the mill and linesite's compound. The agreement was expired on 30/6/2016 but extended to December 2017.	Complied
	b. Company No.: 59220-K for sales and rental of backhoe machine where the agreement signed on 1/11/2016 and valid until 30/6/2018.	
Agreed payments shall be made in a timely manner Minor compliance -	Interview with the contractor confirmed that the payment was made promptly. No any issue on the delaying payment.	Complied
6.11:	levelonment where appropriate	
Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance —	The mill and estates' management have made contribution and donation to the society such as donation to the neighbouring school for their programmes and activities, organized sport day and festival celebrations for the workers, supplied water tank during festive season, grass cutting activity at the school compound and etc. Besides, the mill has provided transport allowance of RM 100/ family per year for the students.	Complied
Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.	No scheme smallholder was involved in the certification units.	Not applicable
	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance - 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 - Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance - Agreed payments shall be made in a timely manner. - Minor compliance - 6.11: Ind millers contribute to local sustainable of consultation with local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance — Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance - Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB is not applicable because the FFB sourced is from own company estates. There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable because the FFB pricing, and pricing mechanisms for FFB is not applicable because the FFB pricing, and pricing mechanisms for FFB is not applicable because the FFB pricing, and pricing mechanisms for FFB is not applicable because the FFB pricing, and pricing mechanisms for FFB is not applicable because the FFB pricing, and pricing mechanism for FFB is not applicable because the FFB pricing, and pricing mechanisms for FFB is not applicable because the FFB sourced is from own company estates. There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable because the FFB sourced is from own company estates. There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable because the FFB sourced is from own company estates. There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable because the FFB sourced is from own company estates. There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable because the FFB sourced is from own company estates. There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable because the FFB sourced is from own company estates. There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable because the FFB sourced is from own company estates. There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable decause the FFB sourced is from own company estates. Contractor's contract agreement was signed by the contractors to pricing mechani



Criterion	/ Indicator	Assessment Findings	Compliance
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used Major compliance -	Employees recruited by the management are with the legal identification for local and valid passport and work permit for foreign workers. The workers were signed on the contract of employment prior commencement of work. They were provided with induction training in Sua Betong Estate before being assigned to each estate. Sampled workers with valid work permit as below:	Complied
		 a. Permit No.: PD 6397960 valid until 15/9/2017 (BKPOM) b. Permit No.: PD 6573374 valid until 15/11/2017 (BKPOM) c. Permit No.: PD 5495796 valid until 5/9/2017 (BKPOM) d. Permit No.: PD 5138393 valid until 11/6/2017 (BKE) e. Permit No.: PD 6745563 valid until 18/5/2017 (BKE) f. Permit No.: PD 6556867 valid until 14/11/2017 (BKE) g. Permit No.: PD 6534388 valid until 27/8/2017 (BCE) h. Permit No.: PD 5495896 valid until 5/9/2017 (BCE) i. Permit No.: PD 5132834 valid until 19/5/2017 (BCE) 	
		The workers have signed on a voluntarily surrender of passport for safe-keeping by the management.	
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance —	Interviewed with the foreign workers found that no substitution of contract occurred.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Sime Daby has implemented a Sime Darby's Responsible Agriculture Charter on 21/9/2016 where they covered Human Rights and Social Development in order to respect human right and empowering communities, protect labour standard and enhance employment condition. Besides, they are also implemented Social policy and Social & Humanity Management policy where they are committed not to practice force labour.	Complied
Criterion (
6.13.1	d millers respect human rights. 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 -	The Social and Humanity management policy was implemented dated January 2015 and it covers the necessary aspects of human rights. Employees are aware of their rights. The policy was communicated to employees during morning muster.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable for Peninsular Malaysia.	Complied





Criterion / Indicator Assessment Findings Compliance

Principle 7: Responsible development of new plantings

Bukit Kerayong Palm Oil Mill and supply base did not carry out any new plantings after November 2005. Therefore, the requirement of Principle 7 is not applicable during the annual surveillance. The immature areas are replanted area as verified during site visit. Document reviewed on the land title and area statement of planting cycle confirmed that no new plantings activities since November 2005.

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

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.

As a minimum, these shall include, but are not necessarily be limited to:

- 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.
- Major compliance -

The SOU has developed few management plan related to social, environmental, HCV and waste to mitigate and continuously improve from the issue raised. The following sampled issue as below:

- To ensure 100% of engine oils spillage are retain and properly disposed by doing regular inspection on the area and construct concrete floor to avoid land contamination.
- b. Cattle's issue raised by the stakeholders where the management has taken initiative to set up cattle watchman and cattle grid to overcome the issue.

Besides, the estates' management have stopped using paraquat as the chemical in the field.

Mill capital budget 2016/2017:

- 1 unit of 27mt/hr boiler
- New additional unit of cages c/w boogies
- UPS for computer with temporary electricity backup
- LEV for lab

BKE capital budget 2016/2017 until 2020/2021

- Concrete fencing at replanting area
- 18 units of workers houses (6 units/year)

Complied



Appendix B: Approved Time Bound Plan

TIME	TIME BOUND PLAN – Certification Units in Malaysia							
SOU No	Name of SOU	Location	Date of certification	End Date of Certification	Remarks			
1	Sungai Dingin	Karangan, Kedah	12 Aug 2010	11 Aug 2020				
2	Chersonese	Kuala Kurau, Perak	5 Oct 2011	4 Oct 2021				
3	Elphil	Sg. Siput, Perak	18 June 2011	17 June 2021				
4	Flemington	Teluk Intan, Perak	5 Oct 2011	4 Oct 2021				
5	Seri Intan	Teluk Intan, Perak	3 March 2011	2 March 2021				
5a	Selaba	Teluk Intan, Perak	3 March 2011	2 March 2021				
6	Tennamaram	Bestari Jaya, Selangor	3 March 2011	2 March 2021				
7	Bukit Kerayong	Kapar, Selangor	15 April 2011	14 April 2021				
8	East	Carey Island, Selangor	19 May 2010	18 May 2020				
9	West	Carey Island, Selangor	19 May 2010	18 May 2020				
10	Bukit Puteri	Raub, Pahang	7 July 2016	6 July 2021				
11	Kerdau	Temerloh, Pahang	7 July 2016	6 July 2021				
12	Jabor	Kuantan, Pahang	7 July 2016	6 July 2021				
13	Labu	Nilai, Negeri Sembilan	30 Dec 2011	29 Dec 2016	Recertification of Labu POM is in progress. PalmTrace License is valid till end of March 2017 in the PalmTrace system.			
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May 2010	18 May 2020	·			
15	Sua Betong	Port Dickson, Negeri Sembilan	18 Feb 2014	17 Feb 2019	Sua Betong Oil Mill has been comissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011.			
16	Kok Foh	Bahau, Negeri Sembilan	7 July 2016	6 July 2021				
17	Kempas	Jasin, Melaka	19 May 2010	18 May 2020				
18	Diamond Jubilee	Jasin, Melaka	5 Oct 2011	4 Oct 2021				
19	Pagoh	Muar, Johor	28 Jan 2014	27 Jan 2019	Pagoh Oil Mill has been commisioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.			
20	Chaah	Chaah, Johor	18 Nov 2010	17 Nov 2020				
21	Gunung Mas	Kluang, Johor	19 May 2010	18 May 2020				
22	Bukit Benut	Kluang, Johor	5 Oct 2011	4 Oct 2021				
23	Ulu Remis	Layang-layang, Johor	11 Apr 2016	10 Apr 2021				



24	Hadapan	Layang-layang, Johor	29 March 2011	28 March 2021	
26	Sandakan Bay	Sandakan, Sabah	1 Oct 2008	30 Sept 2018	
27	Melalap	Tenom, Sabah	21 Jan 2011	20 Jan 2021	
28	Binuang	Kunak, Sabah	16 Jan 2009	12 July 2020	
29	Giram	Kunak, Sabah	16 Jan 2009	12 July 2020	
30	Merotai	Tawau, Sabah	16 Jan 2009	12 July 2020	
31	Lavang	Bintulu, Sarawak	30 Dec 2011	29 Dec 2016	
32	Rajawali	Bintulu, Sarawak	30 Dec 2011	29 Dec 2016	
33	Derawan	Bintulu, Sarawak	30 Dec 2011	29 Dec 2016	
34	Pekaka	Bintulu, Sarawak	30 Dec 2011	29 Dec 2016	

TIME	ME BOUND PLAN – Certification Units in Indonesia						
No	Name of PT/Mill	Location	Date of certification	End Date of Certification	Status		
1	(PT Lahan Tani Sakti) Alur Dumai	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16 Jan 2012	15 Jan 2017			
2	(PT Sajang Heulang) Mustika	Sebamban, Indonesia	3 July 2013	2 July 2018			
3	(PT Ladangrumpun Suburubadi) Angsana	Sebamban, Indonesia	9 Nov 2016	8 Nov 2021			
4	(PT Langgeng Muaramakmur) Bebunga	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16 March 2012	15 March 2017			
5	(PT Kridatama Lancar) Sukamandang	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2 Sept 2016	1 Sept 2021			
6	(PT Bahari Gembira Ria) Ladang Panjang	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9 July 2012	8 July 2017			
7	(PT Tunggal Mitra Plantations) Manggala	Riau, Indonesia	25 Nov 2010	24 Nov 2020			
8	(PT Paripurna Swakarsa) Pondok Labu	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16 March 2012	15 March 2017			
9	(PT Bersama Sejahtera Sakti) Gunung Aru	Sebamban, Indonesia	21 Oct 2016	20 Oct 2021			



10	(PT Guhtrie Pecconnina) Rantau Panjang	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16 March 2012	15 March 2017		
11	(PT Laguna Mandiri) Rantau	Sungai Durian, Kotabaru, Kalimantan Selatan	30 Dec 2011	29 Dec 2021		
12	(PT Laguna Mandiri) Betung	Sungai Durian, Kotabaru, Kalimantan Selatan	1 April 2014	31 March 2019		
13	(PT Indotruba tengah) Sekunyir	Kalimantan Tengah, Indonesia	23 Nov 2010	22 Nov 2020		
14	(PT Swadaya Andika) Selabak	Sungai Durian, Kotabaru, Kalimantan Selatan	16 March 2012	15 March 2017		
15	(PT Bina Sains Cemerlang) Sg Pinang	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11 Sep 2012	10 Sept 2017		
16	(PT Teguh Sempurna) Pemantang	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9 Sept 2016	8 Sept 2021		
17	(PT Bhumireksa Nusa Sejati) Teluk Bakau	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	1 Dec 2016	30 Nov 2021		
18	(PT Bhumireksa Nusa Sejati) Mandah	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	1 April 2014	31 March 2019		
19	(PT Aneka Intipersada) Teluk Siak	Tualang, Perawang, Siak, Riau	8 Dec 2016	7 Dec 2021		
20	(PT Tamaco Graha Krida) Ungkaya	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10 July 2016	9 July 2021		
21	(PT Sime Indo Agro BK Ajong	Kalimantan Barat, Indonesia	18 July 2016	17 July 2021		
22	(PT Padang Palma Permai/PT Perkasa Subur Bakti) Blang Simpo	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3 May 2013	2 May 2018		
23	(PT Sandika Natapalma/PT Budidaya Agro Lestari) Lembiru	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3 July 2014	2 July 2019		
24	(PT Mitra Austral Sejahtera) MAS		The target date matter being res		2017 subject to the progress of the	
			PT MAS has undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO for Partial Certification and the report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. Ongoing and regular (bi-monthly) discussions is ongoing between Sime Darby Plantation and the project affected			



communities. Reports on the progress update are submitted to RSPO on a regular basis since November 2012. The latest progress report submitted to RPSO dated 30th June 2016. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat. **Progress Update for PT MAS** Regular discussion is ongoing between Sime Darby Plantation and the group of community (PAC) through bi-monthly Tim Kerja Perwakilan

- Petani (TKPP) meeting since November 2012.
- In October 2013, representatives from two of nine villages (Kerunang and Entapang) left TKPP. These two villagers are supported by and working with TuK and OXFAM. They have then requested SDP to enter into Dispute Settlement Facility (DSF) in June 2014. Hence, there are two groups of communities:
 - 1. TKPP (7 of 9 villages) and:
 - 2. Kerunang & Entapang (2 of 9 villages)
- To-date, 21 TKPP meetings have been conducted. The most recent TKPP meeting was held on 2nd November 2016. Issues related to the 14 demands are closed except for two items related to land matters i.e. ownership of nucleus plantation after expiry of HGU and allocation of plasma farm within the plasma original village/customary area. SDP is engaging with the local authority on this matter together with TKPP. Current discussion is on moving forward especially on replanting activities.
- SDP visited the Kerunang & Entapang communities on 27 Aug 2014 to listen and have a better understanding on their requests. The subsequent meeting with the communities was held on 12 Dec 2014 where the communities highlighted that they will not join the current SDP-PAC committee (TKPP) meetings and will continue to engage directly with SD instead of using the DSF mechanism.

Engagement with RSPO:

- RSPO Secretariat is well informed on the progress through regular briefing and progress reports. The latest meeting with RSPO Secretariat was held on 8th Sept 2016.
- To-date, 9 progress reports have been submitted to RSPO. The latest progress report was submitted on 30th June 2016.

Engagement with TuK-Indonesia:

- SDP continues to work on direct engagement with PAC working towards a consensus with the PAC to resolve the issues.
- Further information he obtained from can http://www.rspo.org/members/complaints/status-ofcomplaints/view/29



Appendix C: Certification Unit RSPO Certificate Details

Sime Darby Plantation Sdn Bhd Strategic Operating Unit (SOU 7) Bukit Kerayong Palm Oil Mill Jalan Bukit Kerayong 42200 Kapar, Klang Selangor, Malaysia

RSPO membership number: 1-0008-04-000-00

BSI RSPO Certificate No. : RSPO 550181 Date of Initial Certificate Issued: 15/04/2011

Date of Expiry: 14/04/2021

Applicable Standards: RSPO P&C MYNI-2014; RSPO Supply Chain Certification Standard November 2014 Module D

– CPO Mills: Identity Preserved)

Bukit Kerayong Palm Oil Mill and	Bukit Kerayong Palm Oil Mill and Supply Base				
Location Address	Strategic Operating Unit (SOU 7) – Bukit Kerayong Palm Oil Mill, Jalan Bukit Kerayong 42200 Kapar, Klang, Selangor, Malaysia				
GPS Location	101° 22′ 29.6″ E ; 3° 11′ 12.7″ N				
CPO Tonnage Total	27,163.43 mt				
PK Tonnage Total	6,884.74 mt				
CPO Claimed for Certification*	27,163.43 mt				
PK Claimed for Certification *	6,884.74 mt				
Own estates FFB Tonnage	125,177.11 mt				
Scheme Smallholder FFB Tonnage	-				

	Product	tion Area	Other	Certified Area /	Annual FFB	
Estates	Mature (ha)	Immature (ha)	use (ha)	Total land lease (ha)	Production (mt)	
Bukit Kerayong Estate	2,116.59	681.17	450.96	3,248.72	50,576.10	
Bukit Cheraka Estate	2,732.45	667.41	382.02	3,781.88	74,601.01	
TOTAL	4,849.04	1,348.58	832.98	7,030.60	125,177.11	



Appendix D: Assessment Plan

Date	Time	Subjects	Hu Ning Shing	Hafri	Daniel
Monday 16/01/2017	АМ	Audit team travelling to site	√	√	√
Tuesday 17/01/207	0830 – 0900	 Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). 	√	V	V
Bukit Kerayong Palm Oil Mill	0900 - 1200	Bukit Kerayong 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, meeting stakeholders etc	√	V	√
	1000 - 1100	Meeting with stakeholders (village rep, smallholders, Union Leader, contractor etc)	√	-	-
	1200 - 1300	Lunch	√	√	√
	1300-1630	Bukit Kerayong Palm Oil Mill Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	1630-1700	Interim Closing briefing	√	√	√
Wednesday 18/01/2017 Bukit Kerayong Estate	0830-1200	Bukit Kerayong 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.	√	√	√
	1200-1300	Lunch	√	√	√
	1300-1630	Bukit Kerayong 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).	√	√	V
	1630-1700	Interim Closing briefing	√	√	√



Date	Time	Subjects	Hu Ning Shing	Hafri	Daniel
Thursday 19/01/2017 Bukit Cheraka Estate	0830-1200	Bukit Cheraka 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	√	√	√
	1200-1300	Lunch	√	√	√
	1300-1530	Bukit Cheraka 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).	√	√	√
	1530-1630	Preparation for closing meeting	√	√	√
	1630-1730	Closing meeting	√	√	√
	1730	Audit team travelling back to KL	√	√	√



Appendix E: Stakeholders Contacted

Internal Stakeholders	External Stakeholders
Managers	Headmistress, SJK(T) Ldg
Assistant Managers	Brafferton
Staffs	
Workers' Representatives	
Gender Committee	
Representatives	

Government Departments	Local Communities
	Head of Villager, Kg Bukit
	Kerayong



Appendix F: CPO Mill Supply Chain Assessment Report (Module D: Identity Preserved)

Requirements	Compliance			
D.1. Definition				
D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.	Bukit Kerayong mill received only certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products			
D.2 Explanation				
D.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. 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 shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.			
D.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).	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).			
D.3 Documented procedures				
D.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements in these requirements; b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.	Latest written documented procedures (RSPO SCCS v.2 Year 2014) for the chain of custody is with Identity Preserved (IP) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15. This developed based on the RSPO SCCS 21 November 2014. The previous SOP was for SG. The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive. The IP model is used because only certified FFB from own supply base is received and processed at Bukit Kerayong Palm Oil Mill. Noted draft procedure, SD/SSDP/PSQM/001, rev.: 0 dated 1/3/15 has yet to be approved for the SCCS procedure to incorporate latest changes internally and externally under RSPO SCCS November 2014. 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.			
D.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	Bukit Kerayong Palm Oil mill has documented procedures (as per above in D 3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified and non-certified FFBs.			
D.4 Purchasing and goods in				



D.4.1 The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.;	Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Bukit Kerayong mill have system to verify at the weighbridge. Sighted other certified FFB under the same group samped as following: **SOU 6 (Sungai Buluh Estate)* Code: E-016, Consignment note# 16076, Field Div. 3 (A crop) Tennamaram POM RSPO Cert # 0014 effective 3/3/2016 -2/3/2017 **SOU 8 (Dusun Durian Estate)* Code: E-117, Consignment note# 41649, Field Div. Klanang Baru (A crop) East POM RSPO Cert # RSPO 543543
D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facilities aware of this procedure and stated in the.
D.5 Record keeping	
D.5.1 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.	All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place. No PKO and Palm kernel meal at Bukit Kerayong Palm Oil mill. PK is sold to Sime Darby's Kernel Crushing Plant and also other 3 rd party KCP. Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the FFB received. Records of certified FFB received verified during annual surveillance. Records verified by internal and external audit. Based on contract, sampled: CPO: Contract # S/C-PSD/1612/CPO1397C Order Qtty: 75.76mt PK: Contract # S/C-PSD/1701/PK0024; Order Qtty: 100.00mt
D.6 Processing	
D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from noncertified m a t e r i a l including during transport and storage.	During this assessment it was confirmed that only certified source of FFB from own plantation is processed. This ensures that there is no possibility of mixing during processing. There is a possibility that the mill will receive Certified FFB from other Sime Darby's Certified Estate which was certified under SOU1 (SPO 550179 valid until 11/8/20) & SOU3 (SPO 550180 valid until 17/6/17). This will be further verified during next surveillance assessment if such cases occurred and observed. No noncertified FFB received.
D.6.2 The objective is for 100 % segregated material to be reached.	Processing and storage records can trace back to only certified segregated FFB and finish product (CPO and PK) through traceability records such as weighbridge records. This ensures that 100% segregated materials are reached.

<u>Actual Certified Palm Production – January 2016 – December 2016 (Recertification)</u>

Mill	Capacity & Supply Chain Model	СРО	PK
Bukit Kerayong Palm Oil Mill	30 mt/hr Identity Preserved (IP)	14,660.10 mt	3,537.46 mt



<u>Actual Sales of Certified Palm Products – January 2016 – December 2016 (Recertification)</u>

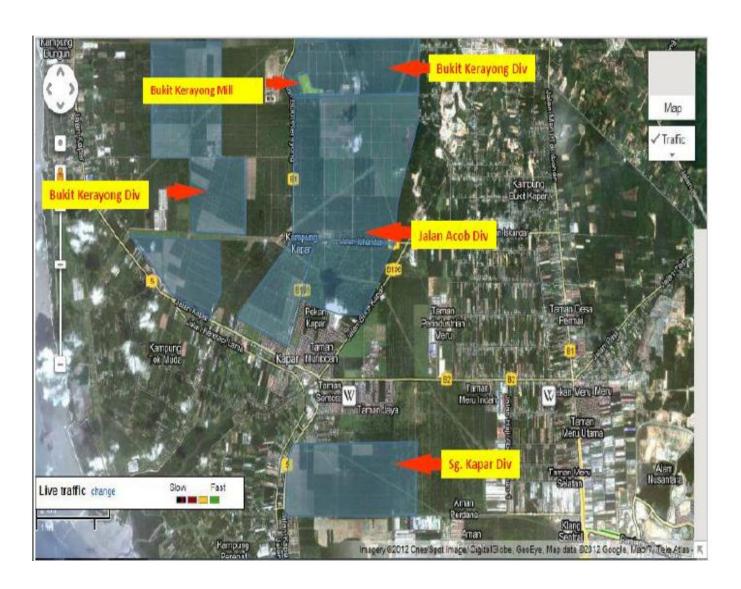
Mill	Certified CPO Sales	Certified PK Sales	Remarks
Bukit Kerayong Palm Oil Mill	14,553.52 mt	3,448.62 mt	Physical sales: 14,553.52 mt (CPO)
			Certificates allocated: 18,800 mt (CPO)

<u>Actual Certified FFB Received Monthly – January 2016 – December 2016 (Recertification)</u>

	Own Supply Base (Estates)					
Month	Bukit Kerayong Estate	Bukit Cheraka Estate	Elmina Estate	Sungai Buloh Estate	Dusun Durian Estate	Total FFB/Month (mt)
January 2016	3,742.35	4,164.46	0.00	0	0	7,906.81
February 2016	4,110.27	3,490.93	47.68	77.72	0	7,726.60
March 2016	3,526.57	4,042.86	67.12	138.52	0	7,775.07
April 2016	2,200.33	2,590.29	25.32	13.16	0	4,829.10
May 2016	0.00	0.00	0.00	0	0	0.00
June 2016	0.00	0.00	0.00	0	0	0.00
July 2016	1,529.05	1,541.67	24.42	0	43.97	3,070.72
August 2016	4,713.67	5,243.49	0	0	7.6	10,025.55
September 2016	4,671.68	5,544.54	0	0	206.96	10,223.82
October 2016	3,600.8	4,120.38	0	0	0	7,928.14
November 2016	2,730.33	3,920.00	0	0	0	6,650.33
December 2016	3,610.20	4,449.00	0	0	0	8,059.20
Total	34,435.25	39,107.62	164.54	229.4	258.53	74,195.34



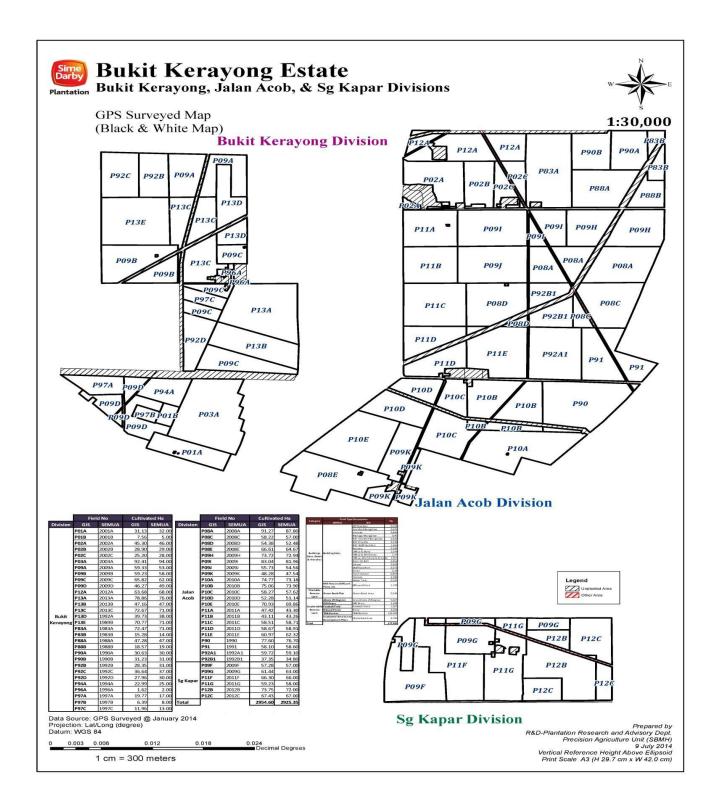
Appendix G: Location Map of Bukit Kerayong Palm Oil Mill Certification Unit and Supply bases





bsi.

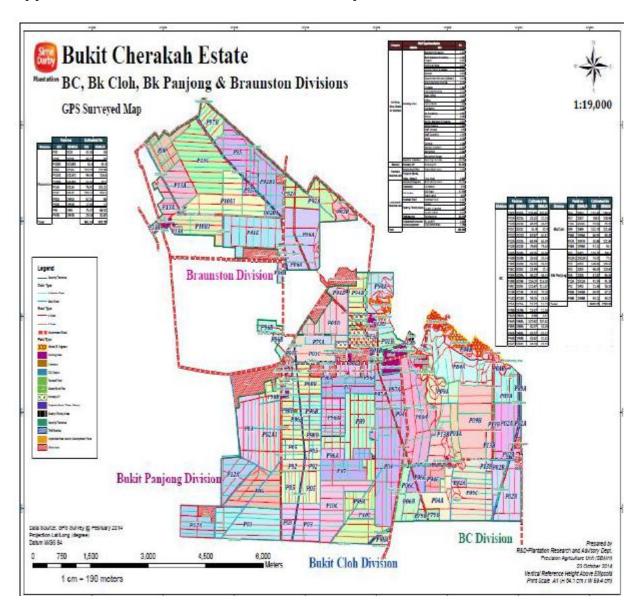
Appendix H: Bukit Kerayong Estate Field Map







Appendix I: Bukit Cheraka Estate Field Map





Appendix J: List of Smallholder Sampled

- Not applicable -



Appendix K: GHG Reporting Executive Summary

The GHG emissions that were produced in 2016 for Bukit Kerayong Palm Oil Mill and supply base was calculated using the GHGpalm Calculator version 3.0. The assessment team had verified the data input in the GHGplam Calculator against operations records. Palm GHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2016 for Bukit Kerayong Palm Oil Mill mill and supply base are as following:

Emission per product	tCO₂e/tProduct	
СРО	1.37	
PKO	1.37	

Extraction	%
OER	19.76
KER	4.77

Production	t/yr	
FFB Process	125,177.11	
CPO Produced	29,284.34	
PKO Produced	7,422.30	

Land Use		На
OP Planted Area		17,714.07
OP Planted on peat		447.36
Conservation (forested)		0
Conservation (non-forested)		0
	Total	18,161.43

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB
Emission								
Land Conversion	42,163.41	0.57	287.82	0.51	0	0	73,880.11	0.41
CO ₂ Emission from fertilizer	4,378.14	0.06	26.34	0.05	0	0	7,308.25	0.04
NO ₂ Emmision	3,656.85	0.05	22.52	0.05	0	0	9,558.66	0.05
Fuel Consumption	341.95	0	3.78	0.01	0	0	785.88	0
Peat Oxidation	0	0	25.04	0.12	0	0	18,391.46	0.08
Sink								
Crop Sequestration	-40,943.06	-0.55	-275.25	-0.48	0	0	-68,567.68	-0.37
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	9,597.29	0.12	90.25	0.25	0	0	41,356.68	0.21

...making excellence a habit."



*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO₂e	tCO₂e/tFFB			
Emission					
POME	14,511.09	0.20			
Fuel Consumtion	74.99	0			
Grid Electricity Utilisation	675.90	0.01			
Credit					
Export of Grid Electricity	0	0			
Sales of PKS	0	0			
Sales of EFB	0	0			
Total	15,261.98	0.21			

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e		
PK from own mill	4,850.11		
PK from other source	0		
Fuel Consumptions	0		
Total Crusher emissions	0		

^{*}This mill has no kernel crusher operation.

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

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



Appendix L: List of Abbreviations Used

ASA Annual Surveillance Assessment
BCE Bukit Cheraka Estate
BKE Bukit Kerayong Estate
BKPOM Bukit Kerayong Palm Oil Mill
BOD Biological Oxygen Demand
CHRA Chemical Health Risk Assessment
CIP Continual Improvement Plan

CPO Crude Palm Oil

DOE Department of Environment

DOSH Department of Occupational Safety & Health

EFB Empty Fruit Bunch

EIA Environmental Impact Assessment EMS Environmental Management System

ERP Emergency Response Plan

FFB Fresh Fruit Bunch HCV High Conservation Value

HIDADOLL -- - I destification Disk Assessment

HIRARCHazard Identification, Risk Assessment and Risk Control

IPM Integrated Pest Management

ISCC International Sustainable Carbon Certification MAPA Malayan Agricultural Producers Association

MPOA Malaysian Palm Oil Association
 MSDS Material Safety Data Sheet
 MSPO Malaysian Sustainable Palm Oil
 MY-NI Malaysian National Interpretation
 NGO Non Governmental Organisation
 NUPW National Union of Plantation Workers

OSH Occupational Safety & Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

PPE Personal Protective Equipment RED Renewable Energy Directive

RSPO P&C Roundtable on Sustainable Palm Oil Principle & Criteria

SAJ Syarikat Air Johor

SCCS Supply Chain Certification Standard SDPSB Sime Darby Plantation Sdn Bhd

SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure SOU Strategic Operating Unit