

MALAYSIAN SUSTAINABLE PALM OIL 2nd ANNUAL SURVEILLANCE ASSESSMENT ASA2 Public Summary Report

Sime Darby Plantation Berhad

Client company Address: Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia

> Certification Unit: Strategic Operating Unit (SOU 18) Diamond Jubilee Palm Oil Mill

Location of Certification Unit: KM 8, Jasin-Simpang Bekoh Road, District of Jasin, 77100 Jasin, Melaka, Malaysia

Report prepared by: Muhammad Fadzli b. Masran (Lead Auditor)

Report Number: 9674129

Assessment Conducted by:

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Section 1: Executive Summary

1.1 Organizational Information and Contact Person				
MPOB License	Mill: 500288804000 Bukit Asahan Estate: 527615002000 Diamond Jubilee Estate: 522967002000 Serkam Estate: 525462002000			
Company Name	Sime Darby Plantation Berhad			
Address Head Office: Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia Certification Unit: Strategic Operating Unit (SOU 18) - Diamond Jubilee Pali Mill, KM 8, Jasin-Simpang Bekoh Road, District of Jasin, 77100 Jasin, Melak Malaysia			SOU 18) - Diamond Jubilee Palm Oil	
Group name if applicable:	Sime Darby Plantation Berhad			
Subsidiary of (if applicable)	Sime Darby Plantation Berhad- Diamond Jubilee			
Contact Person Name	Shylaja Devi Vasudevan Nair (Headquarters) Syahrul Saramlah (SOU Chairman)			
Website	www.simedarbyplantation.com	E-mail	shylaja.vasudevan@simedarbypla ntation.com syahrul.saramlah@simedarbyplan tation.com	
Telephone	603-78484379 (Head Office) 606-5291 302 (Mill)	Facsimile	603-78484356 (Head Office) 606-5292 019 (Mill)	

1.2 Certification Information					
Certificate Number	Mill: MSPO 682043				
	Plantations: MSPO 6	588335			
Issue Date	10/01/2018		Expiry date	09/01/2023	
Scope of Certification	Mill: Production of S	Sustainable Pal	m Oil and Palm C	il Products	
	Estate: Production of	of Sustainable	Oil Palm Fruits		
Stage 1 Date		N/A (The certification unit is RSPO certified)			
Stage 2 / Initial Assessm	nent Visit Date (IAV)	21/11/2017 – 23/11/2017			
Continuous Assessment	Visit Date (CAV) 1	5/9/2018 – 7	/9/2018		
Continuous Assessment	5/8/2019 – 7	/8/2019			
Continuous Assessment	N/A				
Continuous Assessment	Visit Date (CAV) 4	N/A			



Other Certifications						
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date			
RSPO 591224	Roundtable Sustainable Palm Oil	BSI Services Malaysia Sdn Bhd	04/10/2021			

1.3 Location of Certification Unit						
Name of the Certification Unit	Site Address	GPS Reference	of the site office			
(Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)		Longitude	Latitude			
Diamond Jubilee Palm Oil Mill	KM 8, Jasin-Simpang Bekoh Road, District of Jasin, 77100 Jasin, Melaka, Malaysia	102° 29′ 11″ E	2° 20′ 3″ N			
Diamond Jubilee Estate	Ladang Diamond Jubilee, KM 8, Jasin-Simpang Bekoh Road, District of Jasin, 77100 Jasin, Melaka, Malaysia	102° 29′ 18″ E	2° 19′ 50″ N			
Bukit Asahan Estate	Ladang Bukit Asahan, Jalan Asahan, 77100 Melaka, Malaysia	102° 32′ 45″ E	2° 23′ 38″ N			
Serkam Estate	Ladang Serkam, Kemendore Div., 77009 Jasin, Melaka, Malaysia	102° 24′ 59″ E	2° 19′ 24″ N			

1.4 Plantings & Cycle					
Estato			Age (Years) - ha	1	
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Diamond Jubilee	544.83	592.30	1314.18	191.68	0.00
Serkam	469.49	608.99	613.50	96.42	45.35
Bk Asahan	0.00	324.80	2373.01	228.01	39.71

1.5 FFB Production (Actual) and Projected (tonnage)					
Producer Group	Estimated Oct 18-Sept 19	Actual Sept 18-July 19	Forecast * Aug 19-Sept 20		
Diamond Jubilee	64,377.17	52,789.49	64,377.17		
Serkam	40,500.14	10,163.39	-		
Bukit Asahan	58,080.00	68,133.57	58,080.00		
Total	162,957.31	131,086.45	122457.17		

^{*}Serkam Estate transferred to SOU 17 (Kempas) effective July 2019



1.6 Certified CPO / PK Tonnage						
Mill	Estimated (Oct 18 – Sept 19)	Actual (This Year) Sept 18- July 19)	Forecast (Next Year) (Aug 19-Sept 20)			
	CPO (OER: 21.80 %)	CPO (OER: 22%)	CPO (OER: 21.8%)			
Diamond Jubilee POM	35,524.69	28878.79	26,695.66			
25 MT/hr	PK (KER: 5.30%)	PK (KER: 5.38 %)	PK (KER: 5.30%)			
-	8,636.73	7051.65	6,490.23			

1.7 Certified Area						
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted	
Diamond Jubilee	2,642.99	21.48	307.74	2,972.21	88.92	
Serkam	1,833.75	-	283.14	2,116.89	86.62	
Bukit Asahan	2,965.53	1.36	105.30	3,072.19	96.53	
TOTAL	7,442.27	22.84	696.18	8,161.29	91.19	

1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Annual Surveillance Assessment Certification Assessment of Strategic Operating Unit (SOU 18) Diamond Jubilee Palm Oil Mill and supply base located in KM 8, Jasin-Simpang Bekoh Road, District of Jasin, Melaka, Malaysia comprising 3 estates, 1 mill and infrastructure.

The assessment was conducted onsite to assess the compliance of the certification MS 2530- 3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill.

The onsite assessment was conducted on 5/8/2019 - 7/8/2019.

Based on the assessment result, Strategic Operating Unit (SOU 18) Diamond Jubilee Palm Oil Mill complies with the certification MS 2530- 3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill and recommended for certification.



Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
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The Gardens North Tower,
Lingkaran Syed Putra, Mid Valley City,
59200 Kuala Lumpur
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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.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 5/8/2019 - 7/8/2019. The audit programme is included as Appendix A. The approach to the audit was to treat the Diamond Jubilee and Supply base as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, 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. MS 2530-3:2013 or MS 2530-4:2013 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 estates or smallholders sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSPO 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 B.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment are detailed in Section 4.2.



This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by MSPO approved Peer 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 / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Diamond Jubilee POM	X	Χ	X	X	Χ
Serkam Estate	X	Х		Х	Х
Diamond Jubilee Estate	Х	Х	Х	Х	
Bukit Asahan Estate			Х		Х

Tentative Date of Next Visit: August 10, 2020 - August 12, 2020

Total No. of Mandays: 6 mandays

BSI Assessment Team:

Muhammad Fadzli Masran - Lead Assessor

He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. Fluent in Bahasa Malaysia and English Language. During this assessment, he assessed on the aspects of mill and estate best practices, waste management, HCV, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.

Selvasingam T Kandiah – Team Member

He holds a B. Sc. (Hons) Agriculture and had worked as a planter with Sime Darby Plantation Sdn Bhd (formerly known as Kumpulan Guthrie Berhad) for more than 10 years including one year in Liberia and 2 years in Estate Department of Kumpulan Guthrie Headquarters. During this assessment, he assessed on the aspects of legal, mill best practices, environmental and workers and stakeholders consultation. Able to speak Bahasa Malaysia and English.

Accompanying Persons: NA



Section 3: Assessment Findings

3.1 Details of audit results

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

- ☐ MSPO MS 2530-2:2013 General Principles for Independent Smallholders

3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Certification Assessment there were one (1) Minor nonconformities raised. The Diamond Jubilee Palm Oil Mill and supply base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for it effectiveness and closed accordingly.

Minor Nonconformities:					
Ref	Area/Process	Clause			
1807290-201903-N1	Plantations	4.3.1.1 – Part 3			
Requirements:	All operations are in compliance with the application international laws and regulations.	le local, state, national and ratified			
Statement of Nonconformity:	Factories and Machinery (Fencing of Machinery partly complied.	and Safety) Regulations 1970 was			
Objective Evidence:	Diamond Jubilee Estate During site visit at nursery, noted the guard for Engine and the Water Pump at the Oil Palm protection during operation. This shows that Fa Machinery and Safety) Regulations 1970, Regulations.	Nursey is insufficient to provide ctories and Machinery (Fencing of			
Corrections:	New guarding installed by the Foreman				
Root cause analysis:	The guarding was worn out and removed during	the maintenance work			
Corrective Actions:	To include guarding inspection for nursery water checklist (WPI)	pump in workplace inspection			
Assessment Conclusion:	The effectiveness of the NC closure will be verific assessment.	ed in the next surveillance			



	Noteworthy Positive Comments
1.	Good relationship being maintained with surrounding communities and other stakeholders
2.	Mill has continued maximized the use of renewable energy by consuming fibre and shell which produced through internal process.
3.	Good commitment from the Region and Operating Units management to maintain the sustainability
	management.

3.3 Status of Nonconformities Previously Identified and OFI

Minor Nonconformities:				
Ref	Area/Process	Clause		
1681230-201809-N1	Plantations	4.3.1.1-Part 3		
Requirements:	All operations are in compliance with the applinternational laws and regulations.	icable local, state, national and ratified		
Statement of Nonconformity:	Certain legal compliance is not adequately de	monstrated in Serkam Estate.		
Objective Evidence:	Sighted during site visit, SW 305 used lubricant oil and SW 306 used hydraulic oil generated from Nov 2017 still yet to be disposed until the day of visit. Verified the inventory of Scheduled Waste from E-SWISS system sent to DOE, confirmed the waste generated is yet to be disposed. The estate supposed to write letter for Extension of Time for storage Scheduled Waste more than 180 days to DOE in May 2018. However, the estate only submits the letter and application form on 6/8/2018. The application has yet to be approved.			
Root Cause:	The newly recruited store clerk was not trained in scheduled waste management.			
Corrections:	The management has arranged for disposal of schedule waste on 18/9/2018.			
Correction Action Plan:	To train new store clerk on schedule waste m	anagement.		
Assessment	Evidence sighted			
Conclusion:	- Schedule waste management training record	ds dated 14/9/2019		
	- Schedule waste inventory records FY 2019			
	- Schedule waste inventory records, 5 th Scheduled for the month of may, June and July 2019.			
	All the corrective action and evidence of imple The Minor NC closed	ementation were found to be adequate.		



3.4 Issues Raised by Stakeholders

IS#	Description
1	Description
	Feedbacks:
	Headmaster, SJK(T) Ladang Bukit Asahan – school located within company's plantation estate site.
	School always received good support and contribution from estate management in all its school
	programs
	Management Responses:
	Education is part of necessity to be ensured among workers' children
	Audit Team Findings:
_	No further issue
2	Feedbacks:
	Teacher, SK Asahan – received few children from Sime Darby estates. No issue among school
	children whom provided with transport to go and back from school to estate.
	Management Responses:
	Transport for school children provided as necessary to ensure parents can work comfortably
	Audit Team Findings:
	No further issue
3	Feedbacks:
	Neighbouring oil palm plantation (Amertha Plantation) – no issue in boundary with Sime Darby
	estates
	Management Responses:
	Proper estate boundaries were established and maintained as needed
	Audit Team Findings:
	No further issue
4	Feedbacks:
	Badan Kawal Selia Air Melaka Officers – All Sime Darby Estate within Melaka obtained their water
	abstraction license issued by Badan Kawal Selia Air Melaka. No issue on license renewal and
	compliance
	Management Responses:
	Mill and estates always ensure compliance for applicable legal requirements including the state
	government authority requirements
	Audit Team Findings:
	No further issue
5	Feedbacks:
	Cattle owners (Bella Farm) – cooperated with estate requirement to house the cattle in barns out of
	replanting area fields within estate. No issue in cattle rearing within matured palm fields
	Management Responses:
	Estate needs to control and monitor the cattle presence within oil palm fields especially the immature
	and replanted areas which could be potentially damaging if cattle entered
	Audit Team Findings:
	No grievance by cattle owners who agreed to comply with estate requirements
6	Feedbacks:
	Vendors & contractors – long service to Sime Darby Plantation since before merging of 3 companies
	(Sime Darby, Guthrie & Golden Hope) time for more than 10 years. No issue in pricing and payment
	Management Responses:
	Positive comment noted
	Audit Team Findings:



	No further issue	
7	Feedbacks:	
	Local & Foreign Workers – no issue in provision of housing and accommodation. PPE always provided	
	by management. Contract agreements terms and conditions were fully explained by management	
	Management Responses:	
	Workers conditions are always priority to management	
	Audit Team Findings:	
	All feedbacks from workers were used as the input to the checklist	

3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1681230-201809-N1	Minor	7/9/2018	Closed
1807290-201903-N1	Minor	7/8/2019	Open



3.6 Summary of the findings by Principles and Criteria

MS:2530-Part 3 (General principles for Plantations and Organized Smallholders)

Criterior	n / Indicator	Assessment Findings	Compliance
4.1 Princ	iple 1: Management commitment & responsibility		
Criterion	4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy		
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	Sime Darby Plantation has established Corporate Policy Statement for MSPO which was signed by Managing Director on January 2015. Additionally, Head of Plantation Sustainability & Quality Management has issued an internal memo documented the commitment Sime Darby towards MSPO implementation dated on 8/9/2017.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The policy established mention that Sime Darby are committed to making a conscious and concerted effort towards the conservation and protection of wildlife and enhancement of the well-being of communities within and around our operations.	Complied
		In addition, the sustainable policy also mention: 'In support of sustainability, we believe in the principles of quality, safety & health, environmental and social & humanity'.	
		The continual improvement commitment is documented in the following Management & Operation Policies:	
		a) Quality Management Policy b) Lean Six Sigma Policy	



Criterion	n / Indicator	Assessment Findings	Compliance
		c) Quality Policy The commitments are signed by the Managing Director dated January 2015.	
Criterion	4.1.2 – Internal Audit		
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Sime Darby has established standard operating procedure to conduct internal audit and documented in SD/SDP/PSQM/IAP Rev 1 dated 1/5/15. The internal audit was conducted on annually basis as per stated in the SOP established. Latest Internal Audit for SOU 18 was programmed and conducted on 20 - 22/5/2019 by SQM Central West Region. The internal audit was conducted together for RSPO and MSPO. Issue raised during the audit has been addressed by the estates and mills.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Sime Darby has established standard operating procedure to conduct internal audit and documented in SD/SDP/PSQM/IAP Rev 1 dated 1/5/15. The audit results was documented in Internal Consultative Assessment Report. In the report stated the NCR status, details of NCR raised, root cause, corrective action plan, evidence acceptance and NCR closed Sighted the sample findings: BAE i. Minor NC - Internal audit report RSPO/MSPO 2018 is available. However no action plan/evidence sighted for the issue arisen in the report. The issue was closed on 31/7/2019.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		ii. Major NC – The identification of all operation included in the EAI/EIE. However, the aspects identified were not evaluated accordingly. The issue was closed on 31/7/2019.	
		DJE	
		i. Major NC – contract employment was not signed/dated for 2 workers. Contract extension for workers to be renewed following the validity date of original contract. The issue was closed 19/6/2019	
		ii. Major NC – The identification of all operation included in the EAI/EIE. However, the aspects identified were not evaluated accordingly. The issue was closed on 11/6/2019.	
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Sime Darby has established standard operating procedure to conduct internal audit and documented in SD/SDP/PSQM/IAP Rev 1 dated 1/5/15. The audit results was documented in Internal Consultative Assessment Report. In the report stated the NCR status, details of NCR raised, root cause, corrective action plan, evidence acceptance and NCR closed.	Complied
Criterion	4.1.3 - Management Review		
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	MFM Sime Darby has established SOP on Management Review documented in SOM, Section 5, and Management responsibility version 2, issued in 2015. Management review was conducted on annually basis as per SOP established.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		Latest Management Review Meeting for SOU 18 was conducted on 28/6/2019. The meeting covers on matters arising from last meetings, review on status and issue of input and output, sustainability management, assessment on effectiveness, opportunities for improvement and changes, resource evaluation, results from system audit (internal and external), supply chain and traceability, changes that affect management system, recommendations for improvement and other matters.	
Criterion	4.1.4 – Continual Improvement		
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	The estates visited has established continual improvement plan. The plan cover social, environmental, safety and health and operation. Sighted the sampled continuous improvement plan documented in the Kaizen Charter as follows: BAE	Complied
		i. Reduce water management cost	
		ii. Reduce cost ESH under signboard	
		iii. Reduce cost of Road and Bridges	
		iv. Reduce worker housing repair	
		DJE	
		i. Reduce FFB transport cost	
		ii. Reduce cost for loose fruit netting	
		iii. Reduce repairing cost for 3 MT bins	

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Criterio	n / Indicator	Assessment Findings	Compliance
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	System to improve practices in line with new information and techniques was carried out by Mill Management through program namely 'Lean Six Sigma'. The management on receiving these information, was responsible for the implementation of the new projects.	Complied
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.	The estate visited has established continual improvement plan. The plan cover social, environmental, safety and health and operation documented in the Kaizen Charter.	Complied
	- Major compliance -		
4.2 Princ	iple 2: Transparency		
Criterion 4	1.2.1 – Transparency of information and documents relevant to MSF	PO requirements	
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The time frame to provide feedback to the stakeholder is documented to be 2 weeks of the date receiving the queries. The Estate Manager is responsible to address all communication and request for documentations that could be made available to public/stakeholders.	Complied
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental	Sime Darby Plantations Berhad continued to use the group website for disseminating public information. The Sustainability Report and Group Annual report is available in website.	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	or social outcomes Major compliance -	Information relating to land titles, safety and health plans, pollution prevention plans, and annual report are available at the estate. In addition to the website, the policies were also displayed at various locations including the main notice boards of the estates and muster ground notice boards for employees and visitors to view.	
		Procedure for complaints and grievances were available through Sime Darby Plantations Berhad website at http://www.simedarbyplantation.com/Sustainability.aspx	
Criterion	4.2.2 – Transparent method of communication and consultation		
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).	Complied
	. Lajo: compilation	The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.	
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.	Estates visited has appointed person responsible to as consultation and communication representative in the estate.	Complied
	- Minor compliance -	BAE	
		The estate has appointed the Sr. Assistant Manager, Mr. Mansir Bin Fazli as management official responsible for consultation and communication issues is as per appointment letter dated 15/1/2018.	
		DJE	



Criterio	n / Indicator	Assessment Findings	Compliance
		The estate has appointed the Sr. Assistant Manager, Mr. Mr. Mohd. Akhbar Bin Ahmad as management official responsible for consultation and communication issues is as per appointment letter dated 15/12/2017.	
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.	List of stakeholders available as per Details of Stakeholders Bukit Asahan Estate SOU 18 updated FY 18/19 and Diamond Jubilee Estate, Stakeholder List dated 2/1/2019.	Complied
	- Major compliance -	The stakeholder includes authorities, local communities, contractors and vendors/suppliers. Internal stakeholders among all employees including local and foreign workers also available as per List of Local Workers and List of Foreign Workers.	
		Records of communication including confirmation of receipt available as part of publicly available documents including records of Social Impact Assessment (SIA) Report, Management Plan on Social Impact Assessment, Complaint Book (Internal), Complaint Book (External), T3 File - Correspondence with Temple/Mosque/Surau/Church/Chreche w.e.f. Feb 2013 and S1 File – Correspondence with Schools w.e.f. Feb 2013. Sighted a sample of latest official correspondence records with school (SJKT Ladang Bukit Asahan) dated 11/4/2019 requested estate approvals to use estate football field for school sports event on 25/4/2019 which were allowed by estate management accordingly.	
Criterion	4.2.3 — Traceability		
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).	Sime Darby has established SOP for traceability and documented in Sustainable Supply Chain and Traceability version 2, year 2018, issue no 3, issue date Feb 2018. In the SOP stated where if there is	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	contamination of RSPO/MSPO certified material during receiving, processing, storage and despatch, the mill/estate shall downgrade the materials following the downgrade from certified MSPO to Noncertified and the volume of downgraded material shall be recorded accordingly.	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Records showed that management conducted regular inspections on compliance with the established traceability system. Example seen for Internal Audit report as clause 4.1.2.1 & 4.1.2.2.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The person having overall responsibility for and authority over the implementation is Head of Operating Unit as per the SOP for Sustainable Supply Chain and Traceability version 2, year 2018, issue no 3, issue date Feb 2018 and for assisted by Assistant Manager in each estate, as person in charge for Environmental/Quality Management systems as per appointment letter signed by the respective Estate Manager.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained.	The records of FFB sales delivery and transport was recorded in FFB consignment note and FFB weighbridge ticket.	Complied
	- Major compliance -	The FFB consignment was provided by the estate contains information such as:	
		i. Estate Name, Field and Block no.	
		ii. Date harvested	
		ii. Estimate tonnage	
		iii. Vehicle and trailer/bin no.	

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Criterio	n / Indicator	Assessment Findings	Compliance	
4.3 Principle 3: Compliance to legal requirements				
Criterion	4.3.1 – Regulatory requirements			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	SOU 18 had continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. SOU 18 had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were:	Minor NC	
		Bukit Asahan Estate:		
		 Certificate of Fitness for Unfired Pressure Vessels: PMT 64001 (valid till 14/08/2020). 		
		2. MPOB license: 527615002000 (validity until 29/02/2020)		
		3. Diesel permit: M 007949 (validity period 25/01/2019-24/01/2020)		
		Diamond Jubilee Estate:		
		 Certificate of Fitness for Air Receiver Tank: MK PMT 5827 (valid till 02/07/2020) 		
		2. MPOB license (Nursery): 55064811000 (validity until 30/06/2020)		
		3. MPOB license: 522967002000 (validity until 31/08/2020)		
		4. Diesel permit: M 007597 (validity period 25/10/2018-24/10/2019)		
		However during site visit at nursery in Diamond Jubilee Estate, noted the the guard for belting which coupled the Diesel Engine and the Water Pump at the Oil Palm Nursey is insufficient to provide protection during operation. This shows that Factories and Machinery		

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Criterio	n / Indicator	Assessment Findings	Compliance
		(Fencing of Machinery and Safety) Regulations 1970, Regulation 3, First Schedule is partly complied.	
		Thus, Minor NC were raised.	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register.	SOU18 had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of	Complied
	- Major compliance -	applicable legal and other requirements was made available during the assessment.	
		Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.	
		Evaluation of the legal requirements and compliance status with legal requirement are monitored by the operating units.	
		i. Bukit Asahan Estate - Latest review was done on 1/7/2019.	
		ii. Diamond Jubilee – Latest review was done on 1/7/2019MFM	
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.	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.	Complied
	- Major compliance -	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.	
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory	A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	requirements Minor compliance -	Management System) under Standard Operation Manual distributed to all operating units. PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. 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.	
Criterion	4.3.2 – Lands use rights		
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	The cultivation activities did not diminish the land use of other users as all Estate operation was on freehold and leasehold land. All Estate operations was on freehold and leasehold land. Land titles were kept with the Land Management Department while copies of land titles were available at the respective Estates.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	The management of both Estates had documents showing legal ownership/lease, history of land tenure and the actual use of the land. All Estate operations was on freehold and leasehold land. Land titles were kept with the Land Management Department while copies of land titles were available at the respective Estates. Bukit Asahan Estate had 44 land titles under Malacca and 5 titles under Negeri Sembilan Quit rent were paid accordingly. Sighted the land title as follow: Malacca: Grant No. Lot No.	Complied



Criterion / Indicator		Assessr	ment Findings	Compliance
	0000216	000050		
	0012312	1001192		
	0014149	1000846		
	0002962	3000380		
	Negeri Sembila	n:		
	Grant No.	Lot No.		
	00053690	0000831		
	00076705	0000975		
	00000623	0000974		
	00053689	0000421		
			2 land titles under Malacca. Quit rent the land title as follow:	
	Grant No.	Lot No.		



Criterio	Criterion / Indicator		Assess	ment Findings	Compliance
		00000288	0000026		
		00022695	0000055		
		00000299	0000229		
		00022929	0001617		
		of being change	ed SIME DARBY	of some of the titles were in the process and for cultivation of Oil Palm. This was adquarters. Evidence was sighted.	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	and visibly mai	intained. Bounda while bounda	egal boundaries are clearly demarcated aries with jungle was demarcated with aries with smallholders and villages and physical trenches.	Complied
	- Major compliance -	Bukit Asahan	, , ,	, ,,	
		colour GI pipe Kampong Asah to a Army Ca	as observed in language	narcated and visibly maintained with red Block 2000J in Main Div adjacent to a 2010H in Ayer Tekah Division adjacent Sirajuddin). Additionally, estate legal vsical trenches.	
		Diamond Jub	ilee Estate		
		•	•	ntained. The boundary stone are clearly pipe as observed in 2007H1 adjacent	



Criterion / Indicator		Assessment Findings	Compliance
		with Kampong Chenderah and 1996H adjacent to Teck Guan Plantations. Estate legal boundary demarcated with physical trenches	
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC).	There is no land dispute within the Bukit Asahan Estate and Diamond Jubilee Estate at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
	- Minor compliance -		
Criterion	4.3.3 – Customary rights		
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.	There is no land dispute within the estates visited at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
	- Major compliance -		
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available.	There is no land dispute within the estates visited at the time of audit. The land belongs to Sime Darby with further verification of document	Complied
	- Minor compliance -	and stakeholder interview.	
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.	The land belongs to Sime Darby with further verification of document	Complied
	- Major compliance -	and stakeholder interview.	



Criterio	n / Indicator	Assessment Findings	Compliance
Criterion	4.4.1: Social Impact Assessment (SIA)		l
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Sime Darby has conducted Social Impact Assessment for SOU 18 Diamond Jubilee on 12 -15 July 2016 done by the Sustainability Strategy Unit, PSQM. The assessment covers Diamond Jubilee POM, Diamond Jubilee Estate, Bukit Asahan Estate and Serkam Estate. The objectives of the assessment are to identify the existing social issues and to develop social management plan. The assessment has involved the participation of stakeholders and attendance list of stakeholders was sighted. The issues raised by the stakeholders were recorded in the SIA report. Operating units in SOU 18 has established action plan of social impact assessment and was reviewed on annually basis. Any new issue raised during stakeholders meeting or grievances by stakeholders were captured in the management plan. The management plan stated issue raised, action plan, and person responsible and monitoring period.	Complied
Criterion	4.4.2: Complaints and grievances		l
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented.	Sime Darby has established standard operating procedure for dealing with complaint and grievances and documented in Flowchart and Procedure on Handling Social Issues, version 1 and dated 1/11/2008.	Complied
	- Major compliance -	Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders.	



Criterio	n / Indicator	Assessment Findings	Compliance	
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	As per SOP established, all complaint and grievances is open to effected parties including internal and external stakeholders. The time to process the complaints or grievances is 2 weeks.	Complied	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	Complaint Book for Internal and External stake holders was implemented at estates visited. There were no complaints received from the internal and external stakeholders. Besides, Complaint Form for housing repair/ Housing Repair Requisition Form was implemented as well.	Complied	
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Sime Darby Plantation Berhad has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 1/11/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Verified during the site visit and stakeholder's interview.	Complied	
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	The complaint record for request for maintenance are available and kept for 10 years according to the Standard Operation Manual Section 4; Sub-section 4.2.3 Control of Documents.	Complied	
Criterion	4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	Contributions were made based on consultations results as per sample as following:	Complied	

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Criterio	on / Indicator	Assessment Findings	Compliance
		i. Booth for Career & Anti-Drug Week program at school SMK Simpang Bekoh dated 25/4/2019	
		ii. Blood donation campaign date 16/2/2019	
Criterior	1 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	Both Estates continued to adopt the SDPSB's Occupational Safety and Health (OSH) policy. The policy had been communicated to all levels of employees through briefings and training. The policy is also available in Bahasa Malaysia and is being displayed at the notice boards at mill, estate office and Muster Ground.	Complied
4.4.4.2	The occupational safety and health plan shall cover the following:a) A safety and health policy, which is communicated and implemented.b) The risks of all operations shall be assessed and documented.c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:	a) The policy has been established and elaborated in item 4.4.4.1 above. The policy amongst others has mentioned the details of the policy statement and the direction of the organisation towards implementing ESH practices. The clause "A safety and health policy, which is communicated and implemented' is mentioned in the policy. Safety briefing to employees & contractors was made in several training sessions inclusive of safety requirement of the organisation.	Complied
	 i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as 		



Criterion / Indicator	Assessment Findings	Compliance
identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).	Bukit Asahan Estate - HIRARC was reviewed on 28/06/2019 and approved by the Manager.	
e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.	On Diamond Jubilee Estate the HIRARC was reviewed on 09.07.2019. c) Both Bukit Asahan Estate and Diamond Jubilee Estate had conducted awareness and training programme which included safe working practices and the observation of precautions attached to the products.	
f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.	Training and briefing on the operations were provided to all employees to educate them on safe working practices and to ensure applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc.	
g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.	The employees such as the storekeepers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. Details of training records in 4.4.6.3 showed that trainings had been	
h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.	conducted in relation to safety and health for the mill employees. d) All workers were provided with appropriate PPE and replaced when	
i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.	damaged. PPE issuance and replacements records were verified by the auditors. It was also observed that PPE was used by workers working in the fields as per recommend by CHRA.	
j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.	Records of training for were maintained at the office for reference and verification, and were verified during the audit. Some of the latest training conducted were:	



Criterion / Indicator	Assessment Findings	Compliance
- Major compliance -	Based on the HIRARC carried out and Document No. SD/SDP/PSQM (ESH)/201-OS16at MII the types of PPE for the various activity were identified as.	
	i. Harvesters: Gloves, Goggles, Safety helmet, Boots, Sickle and parang covers.	
	ii. Manuring: Gloves, N95 respirator, Apron, Boots	
	iii. Sprayers: Gloves, Goggles, N95 respirator, Apron, Safety helmet, Boots	
	e) The SOP of handling of chemicals is available.	
	a) The document was dated 26/02/17 titled "chemical safety management" 17 pages.	
	b) Therein is shown requirement & selection of chemicals, assessment of chemicals hazards, and selection of supplier and transportation of chemicals.	
	 Storage, handling and training of such is also stated in the procedure in accordance to OSH (USECHH 2000) the guidelines are adequate to address the requirement needed. 	
	d) The manual of the SOP is filed and functional.	
	f) The management had appointed responsible person(s) for workers' safety and health. The Estate Managers were appointed as the chairman of ESH committee. The Manager in turn appointed management and workers representatives.	



Criterion / Indicator	Assessment Findings	Compliance
	Bukit Asahan Estate	
	Chairman – Estate Manager	
	Appointment letters for OSH committee members dated 01/08/2018 was sighted.	
	Diamond Jubilee Estate:	
	Chairman – Estate Manager	
	Appointment letters for OSH committee members dated 02/01/2019 and one letter dated 04.03.2019 was sighted.	
	g) The management had conducted regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare were discussed openly. OSH/ESH meetings were conducted on quarterly basis. Work place inspections and reviews of accident records were discussed during the OSH meetings. No unresolved safety and health issues were noted.	
	Bukit Asahan Estate:	
	Records sighted showed that OSH/EHS meeting had been conducted on 09/05/19, 13/02/19, 15/11/18 and 05 /09/18.	
	Diamond Jubilee Estate:	
	Records sighted showed that OSH/EHS meeting had been conducted on 09/07/19, 06/03/19, 21/11/18 and 02 /08/18.	
	h)Accident and emergency procedures are available in adherence to the SIME DARBY policy on 'Crisis Management & Emergency Response' plan - chapter 13 of PQMS, OSH manual and "Accident and	

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Criterion / Indicator	Assessment Findings	Compliance
	Reporting and Investigation Procedure' in chapter 14 of the same manual.	
	 a) Each estates and mill had procedures emergencies situation as listed below in the table. There was formation of ERP Team & ERP for all the identified incidences. 	
	b) The organization chart for the ERP team was established and displayed for information of the employees.	
	c) The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SQM and amended to tailor to the situation differences in the estates and mills.	
	The ERT consisting of trained First Aiders, field staffs, Mandores, Admin clerk, workshop operator and Security personnel. Interviews with estate staffs and mandores revealed that they had understood and were aware of the emergency procedures requirements.	
	i) It was observed that employees trained in first aid and first aid boxes were available at all the harvesting and manuring sites and workshops visited.	
	The First Aid boxes were checked on a monthly basis by the Medical Assistants. Records of replenishment were verified by the auditor. Fire extinguisher (ABC Powder) assessed during the site observation are available and within the expiry date.	
	Emergency eye wash facility available at chemical stores. Both are in good working condition.	



Criterio	n / Indicator	Assessment Findings	Compliance
		j) Both Estates had monitored the occupational injuries using Lost Time Accident (LTA) metrics. The records, JKKP 8, were available during the assessment and were verified by the auditor.	
		Bukit Asahan Estate	
		Records showed that an Accident took place on 16/03/2019 at home (fell while getting ready to go work). The JKKP 6 was sent to DOSH on 20/03/2019.	
		JKKP 8 for 2018 was sent to DOSH on 23/01/19. There were 124 accident cases with a loss of 124 days	
		Diamond Jubilee Estate	
		JKKP 8 for 2018 was sent to DOSH on 15/01/19. There were 5 accident cases with a loss of 9 days.	
Criterion	4.4.5: Employment conditions		
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively	The Social and Humanity Management Policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations.	Complied
	communicated to the employees.	The policy has been communicated to the workers through induction	
	- Major compliance -	training for new workers, morning briefing and displayed at various notice board within the estate.	
		Latest briefing by Bukit Asahan Estate management to all workers was conducted during muster ground on 29/5/2019 explaining on HCV, COBC, RSPO, MSPO and Policies. For Diamond Jubilee Estate, briefing	



Criterion / Indicator		Assessment Findings	Compliance
		was conducted on 13/7/2019 by Field Supervisors to all harvester and general workers during muster ground session.	
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	SIME DARBY 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
		Latest briefing by Bukit Asahan Estate management to all workers was conducted during muster ground on 29/5/2019 explaining on HCV, COBC, RSPO, MSPO and Policies. For Diamond Jubilee Estate, briefing was conducted on 13/7/2019 by Field Supervisors to all harvester and general workers during muster ground session.	
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	Employment contract are available and explained in language that understood by workers and signed by the workers Besides, for workers who workers more than 2 years (Indonesian) and 3 years (other nationalities) have signed an extension contract (version: EMP04/INDO/2017/01). Interviewed with the workers confirmed that they were understood on the terms and conditions outlined in the employment contract. They were also briefed on the terms and condition during induction training.	Complied
		Sighted the sampled employment contracts as below:	
		BAE i. Employee ID: 108473	

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Criterion	n / Indicator	Assessment Findings	Compliance
		ii. Employee ID: 93489	
		iii. Employee ID: 127507	
		iv. Employee ID: 95548	
		v. Employee ID: 129137	
		vi. Employee ID:147779	
1		vii. Employee ID:51018	
		viii. Employee ID: 78756	
		DJE	
		i. Employee ID: 49340	
		ii. Employee ID: 64393	
		iii. Employee ID: 66559	
		iv. Employee ID: 66573	
		v. Employee ID: 66578	
		vi. Employee ID: 101948	
		vii. Employee ID: 114405	
		viii. Employee ID: 114419	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.		Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	employment contract. The records are documented and available for review.	
4.4.5.5	The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	The estates visited have employed local and foreign workers. All the estates workers are under direct employment and under contract. Sighted the master list of the workers having the information of full names, gender, date of birth, job description and other relevant information.	Complied
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records. - Major compliance -	Employment contract are available and explained in language that understood by workers. Besides, for workers who workers more than 2 years (Indonesian) and 3 years (other nationalities) have signed an extension contract (version: EMP04/INDO/2017/01). Interviewed with the workers confirmed that they were understood on the terms and conditions outlined in the employment contract. They were also briefed on the terms and condition during induction training. The contract was signed by the workers and sampled of contracts as follows: BAE i. Employee ID: 108473 ii. Employee ID: 93489 iii. Employee ID: 127507	Complied



Criterior	n / Indicator	Assessment Findings	Compliance
		iv. Employee ID: 95548	
		v. Employee ID: 129137	
		vi. Employee ID:147779	
		vii. Employee ID:51018	
		viii. Employee ID: 78756	
		DJE	
		i. Employee ID: 49340	
		ii. Employee ID: 64393	
		iii. Employee ID: 66559	
		iv. Employee ID: 66573	
		v. Employee ID: 66578	
		vi. Employee ID: 101948	
		vii. Employee ID: 114405	
		viii. Employee ID: 114419	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.	Time recording system that makes working hours and overtime transparent for both employees established through PIMS accounting system.	Complied
	- Major compliance -		
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations		Complied



Criterion / Indicator	Assessment Findings	Compliance
and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -		
4.4.5.9 Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Pay slips of all employees (check roll) are available as evidence of salary payment. The pay slip contain the following information: i. Earnings - Basic Salary (Daily Rated Work, Work on Rest Day and Work on Holiday), Overtime (Week days, Rest days and Holiday) ii. Deduction - Union fee (NUPW & AMESU), SOCSO, EPF, electricity deduction and others Observed that the wages and overtime payment documented on the pay slips are in line with legal requirement and as stated in the employment contract. Sighted and verified the sampled of payslip for employee with ID no. for the month of March and April 2019 as follows: BAE i. Employee ID: 108473 ii. Employee ID: 93489 iii. Employee ID: 95548 v. Employee ID: 129137 vi. Employee ID: 147779	Complied



Criterion	/ Indicator	Assessment Findings	Compliance
		vii. Employee ID:51018	
		viii. Employee ID: 78756	
		DJE	
		i. Employee ID: 49340	
		ii. Employee ID: 64393	
		iii. Employee ID: 66559	
		iv. Employee ID: 66573	
		v. Employee ID: 66578	
		vi. Employee ID: 101948	
		vii. Employee ID: 114405	
		viii. Employee ID: 114419	
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.	Free water supply and accommodation was supplied to the workers. Facilities such as clinic, football field, temples, community hall and mosque were available on site. Government schools were found constructed inside or nearby the plantations.	Complied
	- Minor compliance -		
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.	Based on visit to the line site and interview with the worker, confirmed that the estates provide adequate housing, water supplies, medical, educational and welfare amenities in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446).	Complied
	- Major compliance -	There is on-going upgrading of housing. Water is supplied to workers housing through SAJ piping while electricity via TNB grid supply.	



Criterior	n / Indicator	Assessment Findings	Compliance
		Accesses to food for the workers are considered adequately and sufficiently as the estate is very near to the town.	
		BAE Line site inspection was done weekly by MA and recorded in the log book. Weekly summary reported via checklist for Bukit Asahan Estate housing inspection i.e. housing complex/NEST/Community Hall Inspections records shown latest inspection done by Medical Assistant dated on 25/7/2019. Previous inspection done on 18/7/2019. Other records of inspection including VMO visiting book latest dated 19/7/2019.	
		DJE Line site inspection was done weekly by MA and recorded in the log book. Weekly summary reported via checklist for Diamond Jubilee Estate housing inspection i.e. housing complex/NEST/Community Hall Inspections records shown latest inspection done by Medical Assistant dated on 25/7/2019. Previous inspection done on 18/7/2019. Other records of inspection including VMO visiting book latest dated 17/7/2019	
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Sime Darby Plantation Berhad has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights.	Complied



Criterion	/ Indicator	Assessment Findings	Compliance
		The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate.	
		Latest briefing by Bukit Asahan Estate management to all workers was conducted during muster ground on 29/5/2019 explaining on HCV, COBC, RSPO, MSPO and Policies. For Diamond Jubilee Estate, briefing was conducted on 13/7/2019 by Field Supervisors to all harvester and general workers during muster ground session.	
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	Sime Darby 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. The policy was developed in Bahasa Malaysia and English. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate. Latest briefing by Bukit Asahan Estate management to all workers was conducted during muster ground on 29/5/2019 explaining on HCV, COBC, RSPO, MSPO and Policies. For Diamond Jubilee Estate, briefing was conducted on 13/7/2019 by Field Supervisors to all harvester and general workers during muster ground session.	Complied
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education	documented in Social and Humanity Management Policy signed by the	Complied



n / Indicator	Assessment Findings	Compliance
programmes. Children shall not exposed to hazardous working conditions.		
- Major compliance -		
4.4.6: Training and competency		
All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.	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.	Complied
- Major compliance -		
Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.	Both Bukit Asahan and Diamond Jubilee Estates continued to identify training needs of individual employees prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.	Complied
- Major compliance -	Both Estates had established the training plan and documented in Training Requirements for Operating Unit. 26 training requirements has been identified for FY 2019.	
A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.	Both Estates continued to have continuous training programme planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. This was evident form the document training programs sighted for 2018 and 2019.	Complied
	programmes. Children shall not exposed to hazardous working conditions. - Major compliance - 4.4.6: Training and competency All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance - Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance - A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the	programmes. Children shall not exposed to hazardous working conditions. - Major compliance - 4.4.6: Training and competency All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance - Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance - A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. This was evident form the document training programs eighted for 2018 and 2019.



Criterion / Indicator		Assessm	ent Findings		Compliance
	Some	of the latest trainings veri	fied during this	audit were:	
	Bukit /	Asahan Estate:			
	NO	Training	Date	No. of Participants	
	1	Fire Drill	26/07/19	39	
	2	First Aid	17/05/19	9	
	3	Spraying	18/07/19	14	
	4	P&D, EFB & Manuring	18/07/19	18	
	5	EIA & EIE	04/07/19	19	
	6	Town hall	16/04/19	80	
	Diame	ond Jubilee Estate:			
	NO	Training	Date	No. of Participants	
	1	Fire Drill	23/04/19	22	
	2	First Aid	25/04/19	12	
	3	Schedule Waste	04/07/19	19	



Criterio	Criterion / Indicator		Asses	sment Findings		Compliance
		4	Manuring	11/02/19	11	
		5	EIA & EIE	04/07/19	19	
		6	Spraying	30/01/19	26	
4.5 Princ	ciple 5: Environment, natural resources, biodiversity and ec	osyste	m services			
Criterion	4.5.1: Environmental Management Plan					
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	Biodiv 2015 Manag HCV A	Sime Darby Plantation Sdn Bhd has established the Environment & Biodiversity Policy signed by Datuk Franki Anthony Dass on January 2015 and Environmental Management Plan which covers EAI/EIE Management Plan, Waste Management Plan, Water Management Plan, HCV Area and Pollution Prevention Plan. Both estates continued to use this policy and plan.			
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. - Major compliance -	Both I mitiga latest Enviro Waste	Both Estates had established an environmental improvement plan to mitigate the negative impacts and to promote the positive ones. The latest Environmental Management Plan was for FY 2019. The Environmental Management Plan covered EAI/EIE Management Plan, Waste Management Plan, Water Management Plan, HCV Area and Pollution Prevention Plan.			
		in ch	lan has been monitored arge to monitor the ammed. The Environme	implementation o	n each plan as per	



Criterio	n / Indicator	Assessment Findings	Compliance	
		Management Plan, Waste Management Plan, Water Management Plan, HCV Area and Pollution Prevention Plan.		
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	Both Estates had established an environmental improvement plan to mitigate the negative impacts and to promote the positive ones. The latest Environmental Management Plan was for FY 2019. The plan has been monitored quarterly. In the plan stated the person in charge to monitor the implementation on each plan as per programmed. The Environmental Management Plan covered EAI/EIE Management Plan, Waste Management Plan, Water Management Plan, HCV Area and Pollution Prevention Plan.	Complied	
	Bukit Asahan Estate			
		The latest reviewed on the EAI/EIE Plan for FY 2019 was done on 25/7/2019 to include Manuring and Pest and Disease. The management plan has been monitored quarterly. The estate has appointed person in charge to monitor the implementation of each plan as per time frame.		
		Diamond Jubilee Estate		
		The latest reviewed on the EAI/EIE Plan for FY 2019 was done on 14.03.2019. No changes have been made.		
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Based on the Standard Operation Manual; subsection 5.4; Planning and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure, POM and Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts. The continual improvement plan had programs to promote the positive impacts. For example, to reduce any run-off	Complied	

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Criterio	n / Indicator	Assessment Findings	Compliance
		pesticides to land, to eliminate traces of oil spillage at the workshop/tractor parking bay, to reduce the released exhaust emission to air, to reduce massive land contamination at the landfill area and etc.	
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	Both Estates continued to have continuous awareness and training programs planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. The Estates had established the annual training program that covered all MSPO requirement. The training programme reviewed annually. The 26 awareness and training program requirements for Operating Unit on for 2019 included training on Environmental Management and Environmental Improvement. These were evident form the document training programs sighted for 2018 and 2019.	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	The management continued to have regular meetings with workers where concerns of workers about the environmental quality are discussed. This was discussed at the quarterly held ESH committee meetings.	Complied
		Records showed that OSH/EHS meetings were held on: Bukit Asahan Estate	
		Records showed that OSH/EHS meetings were held on a quarterly basis. The latest were on: 09/05/19, 13/02/19, 15/11/18 and on 05/09/18.	
		Bukit Asahan Estate	
		Records showed that OSH/EHS meetings were held on a quarterly	



Criterio	n / Indicator		Asses	sment Findings		Compliance
		basis. The late 02/08/18.	st were on: 09	/07/19, 06/03/19, 21	1/11/18 and	
Criterion	4.5.2: Efficiency of energy use and use of renewable energy					
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	an Energy Mar non-renewable At the estate monitored on being monitor	nagement Plan e energy and re s, diesel cons a monthly basi red at the o trends. Sighte of FFB were:	which focused on the enewable energy. umption per metric is. It was verified the perating units for	tate had established e efficiency usage of ton FFB was also at energy usage are better control and record for 2019 the	Complied
		Month	Water (m3)	Electricity (KWH)	Diesel (Litres)	
		Jan	1.43	6.32	0.33	
		Feb	1.31	5.48	0.40	
		Mar	1.55	5.69	0.31	
		Apr	1.24	4.81	1.09	
		Diamond Jubil	ee Estate			
		Month	Water (m3)	Electricity (KWH)	Diesel (Litres)	
		Jan	2.25	3.65	1.59	



Criterio	Criterion / Indicator		Assessment Findings			
		Feb	2.03	4.26	1.46	
		Mar	1.83	3.31	1.38	
		Apr	1.71	3.17	1.22	
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations.	focused on the renewable ene	he efficiency		igement Plan which ewable energy and	
	This shall include fuel use by contractors, including all transport and machinery operations.	The managem management p	oe of energy for the			
	- Major compliance -	The estimates operations, incefficiency of the budget project				
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Though both which focused currently there				
Criterion	4.5.3: Waste management and disposal					
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Records showed that both Bukit Asahan & Diamond Jubilee Estates had identified waste products and sources of pollution and documented them in the Waste Management Plan. Waste had been categorized into four groups:				P
		i. Do	mestic Waste	i.e. Rubbish and Sev	vage	
		ii. In	dustrial Waste	i.e. Scrap Metal, EFE	B, POME	



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products - Major compliance -	iii. Scheduled Waste i.e. used lubricant, used lubricant container, Spent Chemicals, Clinical waste. iv. Recycle waste: Paper, plastics, glass and metal The both Bukit Asahan Estate and Diamond Jubilee Estate had established an Environment Management Plan 2019 which included Pollution Prevention Plan and Waste Management plan FY 2019 and it has been monitored quarterly. The management plan focusing on; i. No open burning in linesite area ii. To ensure proper landfill management iii. To ensure spraying activity not polluting the environment iv. To comply with EQA 1974	Compliance
		v. Replanting: to prevent the destruction of riparian vi. Replanting: to minimize soil erosion Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. EFB applied at selected fields at the estates. Recommended rate is 45mt/ha. Diamond Jubilee Estate During the visit EFB field application was observed field 2002H – as at July 2019, 1,506.77 tons of EFB had been applied in this field. To date, EFB applied as at July 2019 was 12,485.15 tons. In 2018 a total of 20,556.46tons of EFB had been applied.	



Criterior	n / Indicator	Assessment Findings	Compliance
		POME; Records showed that POME was being applied over a total of 40.0 Ha in Fields 2006H. 2002H. 2005H and 2011A. In 2018 70,236.36 m3 and as at July 2019.40,778,52m3 of POME had been applied respectively.	
		Additionally, the waste management plan has identified four category of waste and source pollution. The waste has been categorized into four group:	
		i. Domestic Waste	
		ii. Industrial Waste	
		iii. Scheduled Waste	
		iv. Recyclable waste	
4.5.3.3	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.	Based on policy to reduce, reuse and recycle, the management of used chemicals and containers were done in accordance Scheduled Waste regulations.	Complied
		Empty pesticides containers were collected in scheduled waste store after being triple rinsing and punctured at the bottom of the container.	
	- Major compliance -	The used chemical containers were sold to SS Setia Teknologi Enterprise to be recycled.	
4.5.3.4	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the	On both Bukit Asahan Estate and Diamond Jubilee Estate Empty pesticide containers were punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels had been adhered to.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	national programme on recycling of used HDPE pesticide containers.	The used chemical containers were sold to SS Setia Teknologi Enterprise to be recycled.	
	- Major compliance -		
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.	Domestic waste from Diamond Jubilee Estate was disposed as such to minimize the risk of contamination of the environment and	Complied
	- Minor compliance -	watercourse. Proper disposal of Domestic waste carried out as per the company procedures. The procedures are fully understood by workers and managers. Workers interview reveal that they are aware of the zero burning policy including domestic waste was not allowed to be burned.	
		Domestic waste was removed thrice a week from living quarters and sent to government approved landfills by Majlis Perbandaraan Jasin. Records of domestic waste removal were sighted.	
Criterion	4.5.4: Reduction of pollution and emission		
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.	For estates, the assessment of all polluting activities conducted by water sampling analysis. Sighted the water sampling analysis as follows:-	Complied
	- Major compliance -	Bukit Asahan Estate water analysis:	
		Pesticide in water analysis Report no. PL845/2018 dated 01/11/2018 by Sime Darby Research Sdn. Bhd. Report shown result conforms to the INWQS requirements.	
		Industrial Effluent water analysis Report no. IE440/2019 dated 25/04/19	



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	For the estate, GHG emissions identified including COx, SOx and NOx from various sources including fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area.	Complied
Criterion	4.5.5: Natural water resources		
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may	SOU 18 has established water management plan and documented as the management plan in the Environmental Management Plan. The management plan has been reviewed annually.	Complied
	 include: a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. 	The estates had established the water management plan FY 2019 and documented in Environmental Management Plan. The plan reviewed annually and monitored on quarterly basis. The management plan focusing on: i. To monitor the quality of main water inlet/outlet for pollutants from estate operations. ii. Contingency plan during water shortage iii. To monitor usage of treated water on monthly basis iv. To reuse/recycle wastewater v. Protection of water courses and wet land Both Estates had monitored water usage per ton of FFB and records sighted were as follows: Bukit Asahan Estate Month Water (m3)	



Criterion / Indicator		Asses	sment Findings	Compliance
f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.	Jan	1.43		
	Feb	1.31		
- Major compliance -	Mar	1.55		
	Apr	1.24		
	Diamond Jubile	ee Estate		
	Month	Water (m3)		
	Jan	2.25		
	Feb	2.03		
	Mar	1.83		
	Apr	1.71		
			the rainfall data and the data can be nd Fertiliser Recommendations Report.	
	Rainfall data w	om 2008.		
		amples from st	reams/rivers, version 1, year 2008, issue	



Criterio	n / Indicator	Assessment Findings	Compliance
		The water sampling exercise for river samples as well as water for domestic usage requirements need to be carried out on quarterly basis (January, April, July and October).	
		On Bukit Asahan Estate reports of water analysis sighted were:	
		Pesticide in water analysis Report no. PL845/2018 dated 01/11/2018 by Sime Darby Research Sdn. Bhd. Report shown result conforms to the INWQS requirements. Industrial Effluent water analysis Report no. IE440/2019 dated 25/04/19.	
		Diamond Jubilee Estate	
		There were no natural water ways.	
		There were no bore wells in both estates.	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	During the visit no construction of bunds, weirs and dams across waterways passing through Bukit Asahan Estate was observed.	Complied
	- Minor compliance -	There were no waterways observed in Diamond Jubilee Estate.	
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).	Water harvesting practices such as surface run off water was directed in roadside pits and field drains.	Complied
	- Minor compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. - Major compliance -	 HCV Re-Assessment for Strategic Operating Unit (SOU) 18 Diamond Jubilee has been conducted on July 2016 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. The Final Reported (Version II) dated April 2017 was made available to auditors. Total HCV area of 6.94 Ha identified for SOU 18 Diamond Jubilee Estate falls under: 1. Water Catchment area – 0.69 Ha category HCV 4 (Bukit Asahan Estate, Ayer Tekah Division) 2. Water Catchment area –0.67 Ha category HCV 4 (Bukit Asahan Estate, Main Div) Water Catchment area – 5.58 Ha category HCV 4 (Diamond Jubilee Estate) 	Complied
4.5.6.2	 If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include: a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. - Major compliance - 	HCV Re-Assessment for Strategic Operating Unit (SOU) 18 Diamond Jubilee has been conducted on July 2016 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. The Final Reported (Version II) dated April 2017 was made available to auditors. Based on the above report No RTE was identified within the planted or surrounding village area. Though no RTE were identified to be present Signage that no fishing, no swimming and water polluting activities had been put up and were verified on-site at the estates visited (i.e. Bukit Asahan Estate and Diamond Jubilee Estate) found to have been satisfactorily maintained.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	An Action Plan for Biodiversity FY18/19 SOU Diamond Jubilee was sighted. The scope includes muster briefing, awareness training, signage prohibiting illegal activities, marking of slope. The management plan was monitored on 3 monthly basis by assistant manager.	Complied
Criterion	4.5.7: Zero burning practices		
palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -		SIME DARBY Management complied with the Malaysian environmental law —EQA and Regulations 1974 and had established a policy of no open burning Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. As advocated, both estates practiced Zero burning. In the 2017 and 2018 replants visited during the audit. It was evident that all palms were felled, shredded, windrowed and left to decompose.	Complied
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.	The was no evidence of any previous crop being highly diseased There was no evidence fire has been used for preparing land for replanting in both estates. The estates had adhered to the Zero Burning Policy of SIME DARBY	Complied
	- Major compliance -		
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.	No controlled burning had been required on both estates and there was no evidence to show that any burning had been carried out.	Complied
	- Major compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	SIME DARBY Management complied with the Malaysian environmental law –EQA and Regulations 1974 and had established a policy of no open burning Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. As advocated, both estates practiced Zero burning. In the 2017 and 2018 replants visited during the audit. It was evident that all palms were felled, shredded, windrowed and left to decompose.	Complied
4.6 Princ	ciple 6: Best Practices		
Criterion	4.6.1: Site Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	Standard operating procedures had been appropriately documented. Some of the SOP's reviewed were as follow:	Complied
	- Major compliance -	Sime Darby Agricultural Reference Manual [SDP/OP/ARM dated 1/7/2011]	
		 Estate Quality Management System Standard Operating Procedures 3/3/2008 	
		 Sime Darby Occupational Safety and Health Manual (SDPSB/01/08 dated 3/3/2008) 	
		 Handling of Environmental Aspects level 3.0 section VII handling of scheduled wastes. Version 1 2008 issue no 1 dated 1/11/2008. 	
		Plantations / Mill Quality Management System (PQMS / MQMS) Manual,	



Criterion / Indicator	Assessment Findings	Compliance
	PQMS / MQMS Standard Operating Manual and Procedures (SOP)	
	Sustainable Plantation Management System (SPMS) Manual,	
	RSPO Supply Chain Manual,	
	ESH Management System Manual,	
	Occupational Safety and Health Manual,	
	Pictorial Safety Standards	
	Security Guidelines Manual.	
	Standard Operating Manual and Procedures (SOP)	
	"Guidelines On River Management" manual,	
	For the estates, on top of the PQMS, technical guidelines as listed in the Agricultural Reference Manual were also used. It includes the operation activities in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security Contents of the manual were disseminated to the workers through morning roll call and trainings.	
	The manuals were kept in the administration office where everyone can refer.	
	Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the	



Criterio	n / Indicator			Assessmen	t Findings		Compliance
		SOF	tice and the				
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. - Major compliance -	to r	ninimise and lace for plan • Slope & slope an • item 8	control erosion and tings on slopes betw River Protection Po d in	trategy for planting of degradation of soils. ween 9 and 25 degree olicy – Buffer Zone 8 Preparation for Terra	The strategy es was in & 25 degrees	Complied
			Manual Both Bukit Asahan and Diamond Jubilee Estates visited had complied with this strategy.				
		and of f terr inte wer esta the Bo	degradation ronds, EFB apaces, road rulines. Visits e covered ablished <i>Muc</i> replants. No	of soils were also a oplication, avoidance naintenance and m to the site found the with Neprolepis buna bracteata Cobare ground was si	s to minimise and condvocated through pro- e of blanket spraying, naintenance of soft value significant areas on siserrata. Most slope wer crop was observed ighted during the visit which showed slope	oper stacking construction regetation in f the ground es had well ed planted in t.	
			Slope	Bukit Asahan Estate %	Diamond Jubilee Estate %		
		1	0°-2°	34.32	25.30		



Criterio	n / Indicator	Assessment Findings				Compliance	
		2	2º-6º	57.09	65.20		
		3	6º-12º	8.24	9.40		
		4	12°-20°	0.34	0.10		
		5	20°-25°	0.01	-		
		6	>25°	-	-		
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	or r mar trur Diar ider	Bukit Asahan Estate; The estate had established a visual identification or reference system shall for each field and a Map Establish. It was marked on concrete slabs and some on metal plates placed on palm trunks. Diamond Jubliee Estate; The estate had also established a visual identification or reference system shall for each field and a Map Establish. It was marked on T shaped concrete slabs.				Complied
Criterion	4.6.2: Economic and financial viability plan						
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	was sigh cult RSP	Business planning to ensure long—term economic and financial viability was evident. The annual budgets for the period 2019 to 2024 were sighted. The budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budgets included projections on yield/ha, and total cost of production per MT & per ha.				Complied



Criterio	n / Indicator		Ass	essment Findings	Compliance
		CAPEX - capital asset related ex	•	e mainly for buildings, furniture and others	
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	Jubilee Estate I Replanting was performance fie	had long ra planned f eld (yield) a	tes, both Bukit asahan Estate and Diamond ange replanting programs until FY 2038. For the palm older than 25 years, non- and fields with high ganoderma infected ramme up to year 2024 was as follows:	Complied
		Bukit Asahan	Estate		
		Estate has revi replanting progr		LRRP since last visit. Sighted the latest bllows:	
		YEAR	НА		
		2019	79.22		
		2020	209.99		
		2021	212.81		
		2022	214.11		
		2023	253.84		
		2024	260.38		



Criterio	n / Indicator		Ass	essment Findings	Compliance
		Diamond Jubil	ee Estate		
		Estate has revi replanting progr		LRRP since last visit. Sighted the latest bllows:	
		YEAR	НА		
		2019	0		
		2020	128.40		
		2021	56.56		
		2022	0		
		2023	142.96		
		2024	50.78		
4.6.2.3	The business or management plan may contain:			overed activities for upkeep, cultivation,	Complied
	a) Attention to quality of planting materials and FFB			, welfare, capital expenditure, RSPO ets included projections on yield/ha, and	
	b) Crop projection: site yield potential, age profile, FFB yield trends				
	c) Cost of production: cost per tonne of FFB				
	d) Price forecast				



Criterio	n / Indicator	Assessment Findings	Compliance
	e) e) Financial indicators : cost benefit, discounted cash flow, return on investment		
	- Major compliance -		
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	The management plan was effectively implemented and the achievement of the goals and objectives were regularly monitored, documented and reviewed through monthly progress reports, monthly accounts reports and annual financial reports.	Complied
Criterion	4.6.3: Transparent and fair price dealing		
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented.	For other services, the pricing mechanism was done documented in contract agreement between Sime Darby and the contractors. The	Complied
	- Major compliance -	contract and pricing mechanism was agreed by both parties.	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.	All contracts were fair legal and transparent and agreed with both parties. In the contracts stated the contract duration, term and	Complied
	- Major compliance -	condition, indemnity, responsibilities of Sime Darby Plantation and estate management, notices, cost, force majeure, non-assignability, misc, interpretation and rate of payment.	
		Sighted the sampled of memorandum of agreement as follows:	
		i. Sime Darby Plantation Berhad with Sri Yogaletchumi Kali Enterprise	
		ii. Sime Darby Plantation Berhad with Ponvel Enterprise	
		iii. Sime Darby Plantation Berhad with Rajandran Setia Sdn Bhd.	



Criterio	n / Indicator	Assessment Findings	Compliance
		Payment were made to the contractors in timely manner as agreed in the Memorandum of Agreement as noted during interview with the contractors. Sighted the payment records as follows:	
		Ponvel Enterprise	
		i. Payment document no. 430467917 dated 11/6/2019	
		Rajandran Setia Sdn Bhd	
		ii. Payment document no. 4300467918 dated 3/6/2019	
		iii. Payment document no. 4300462808 dated 8/5/2019	
		Sri Yogaletchumi Kali Enterprise	
		i. Payment document no. 4300469170 dated 4/6/2019	
Criterion	4.6.4: Contractor	,	
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.	SOU 18 had informed its contractors regarding the need to follow the MSPO requirements through MSPO briefing to contractors.	Complied
	- Major compliance -		
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	All contracts were fair legal and transparent and agreed with both parties. In the contracts stated the contract duration, term and condition, indemnity, responsibilities of Sime Darby Plantation and estate management, notices, cost, force majeure, non-assignability, misc, interpretation and rate of payment.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	The requirement of accepting MSPO accredited auditors to audit against the contractors was communicated to the contractor through MSPO training and formal letter to contractor.	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.	All works performed at the estates are checked and verified by the estates personnel before payment been made to the contractors.	Complied
	- Major compliance -		
4.7 Princ	ciple 7: Development of new planting		
Criterion	4.7.1: High biodiversity value		
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation.	No development of new planting in estates visited	NA
	- Major compliance -		
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required.	No development of new planting in estates visited	NA



Criterion	n / Indicator	Assessment Findings	Compliance
	- Major compliance -		
Criterion	4.7.2: Peat Land		•
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	No development of new planting in estates visited	NA
Criterion	4.7.3 : Social and Environmental Impact Assessment (SEIA)		
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.	No development of new planting in estates visited	NA
	- Major compliance -		
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders.	No development of new planting in estates visited	NA
	- Major compliance -		
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.	No development of new planting in estates visited	NA
	- Major compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed.		NA
	- Minor compliance -		
Criterion	4.7.4 : Soil and topographic information		
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	No development of new planting in estates visited	NA
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.	No development of new planting in estates visited	NA
	- Major compliance -		
Criterion	4.7.5 : Planting on steep terrain, marginal and fragile soils	,	
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws.	No development of new planting in estates visited	NA
	- Major compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	No development of new planting in estates visited	NA
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	No development of new planting in estates visited	NA
Criterion	4.7.6: Customary land	<u> </u>	
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	No development of new planting in estates visited	NA
	- Major compliance -		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.	No development of new planting in estates visited	NA
	- Minor compliance -		
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and	No development of new planting in estates visited	NA



Criterio	n / Indicator	Assessment Findings	Compliance
	of payment or provision of agreed compensation shall be made available.		
	- Major compliance -		
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement.	No development of new planting in estates visited	NA
	- Major compliance -		
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented.	No development of new planting in estates visited	NA
	- Major compliance -		
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented.	No development of new planting in estates visited	NA
	- Major compliance -		
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available.	No development of new planting in estates visited	NA
	- Major compliance -		
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development.	No development of new planting in estates visited	NA



Criterion / Indicator	Assessment Findings	Compliance
- Minor compliance -		

MSPO MS:2530-Part 4 (General Principles for Palm Oil Mills)

Criterio	n / Indicator	Assessment Findings	Compliance				
4.1 Princ	1.1 Principle 1: Management commitment & responsibility						
Criterion	4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy						
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	Sime Darby Plantation has established Corporate Policy Statement for MSPO which was signed by Managing Director on January 2015. Additionally, Head of Plantation Sustainability & Quality Management has issued an internal memo documented the commitment Sime Darby towards MSPO implementation dated on 8/9/2017.	Complied				
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The policy established mention that Sime Darby are committed to making a conscious and concerted effort towards the conservation and protection of wildlife and enhancement of the well-being of communities within and around our operations. In addition, the sustainable policy also mention: 'In support of sustainability, we believe in the principles of quality, safety & health, environmental and social & humanity'.	Complied				



Criterio	n / Indicator	Assessment Findings	Compliance
		The continual improvement commitment is documented in the following Management & Operation Policies:	
		d) Quality Management Policy	
		e) Lean Six Sigma Policy	
		f) Quality Policy	
		The commitments are signed by the Managing Director dated January 2015.	
Criterion	4.1.2 — Internal Audit		
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	Sime Darby has established standard operating procedure to conduct internal audit and documented in SD/SDP/PSQM/IAP Rev 1 dated 1/5/15. The internal audit was conducted on annually basis	Complied
	- Major compliance -	as per stated in the SOP established. Latest Internal Audit for SOU 18 was programmed and conducted on 20 - 22/5/2019 by SQM Central West Region. The internal audit was conducted together for RSPO and MSPO. Issue raised during the audit has been addressed by the estates and mills.	
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.	Sime Darby has established standard operating procedure to conduct internal audit and documented in SD/SDP/PSQM/IAP Rev 1 dated 1/5/15. The audit results was documented in Internal Consultative Assessment Report. In the report stated the NCR	Complied
	- Major compliance -	status, details of NCR raised, root cause, corrective action plan, evidence acceptance and NCR closed	
		Sighted the sample findings:	



Criterion / Indicator		Assessment Findings	Compliance
		i. Major NC – New weighbridge operator has not undergone SCCS training.	
		ii. Minor NC – Training for competent first aider was arranged in July 2018. However, no internal training was conducted for first aider in the mill.	
		iii. Major NC – HIRARC was not review after recent accident.	
		iv. Major NC – Audiometric test was not sent for workstation Boiler and Engine Room.	
		All non-conformity raised during the audit has been addressed by the mill. Root cause analysis and Corrective Action Plan was submitted to the Internal Audit Plan for review. The evidenced was verified by the internal audit team before NC closure.	
4.1.2.3	Reports shall be made available to the management for their review.	Sime Darby has established standard operating procedure to	Complied
	- Major compliance -	conduct internal audit and documented in SD/SDP/PSQM/IAP Rev 1 dated 1/5/15. The audit results was documented in Internal Consultative Assessment Report. In the report stated the NCR status, details of NCR raised, root cause, corrective action plan, evidence acceptance and NCR closed.	
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.	Sime Darby has established SOP on Management Review documented in SOM, Section 5, Management responsibility version 2, issued in 2015. Management review was conducted on annually basis as per SOP established.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	Latest Management Review Meeting for SOU 18 was conducted on 28/6/2019. The meeting covers on matters arising from last meetings, review on status and issue of input and output, sustainability management, assessment on effectiveness, opportunities for improvement and changes, resource evaluation, results from system audit (internal and external), supply chain and traceability, changes that affect management system, recommendations for improvement and other matters.	
Criterion	4.1.4 – Continual Improvement		
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.	The estate visited has established continual improvement plan. The plan cover social, environmental, safety and health and operation. Sighted the sampled continuous improvement plan documented in	Complied
	- Major compliance -	the Kaizen Charter as follows: i. To sell crap iron	
		ii. To increase the selling of PK shell	
		iii. To increase PQSQ oil production	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	System to improve practices in line with new information and techniques was carried out by Mill Management through program namely 'Lean Six Sigma'. The management on receiving these information, was responsible for the implementation of the new projects.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.2 Princ	ciple 2: Transparency		
Criterion 4	1.2.1 – Transparency of information and documents relevant to MSPO	requirements	
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The time frame to provide feedback to the stakeholder is documented to be 2 weeks of the date receiving the queries. The Mill Manager is responsible to address all communication and request for documentations that could be made available to public/stakeholders.	Complied
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	Sime Darby Plantations Berhad continued to use the group website for disseminating public information. The Sustainability Report and Group Annual report is available in website. Information relating to land titles, safety and health plans, pollution prevention plans, and annual report are available at the estate. In addition to the website, the policies were also displayed at various locations including the main notice boards of the estates and muster ground notice boards for employees and visitors to view. Procedure for complaints and grievances were available through Sime Darby Plantations Berhad website at http://www.simedarbyplantation.com/Sustainability.aspx	Complied
Criterion	4.2.2 – Transparent method of communication and consultation	'	



Criterion / Indicator		Assessment Findings	Compliance
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	The estate has appointed the Assistant Manager, Mr. Muhammad Hafiz Bin Ab. Halim as management official responsible for consultation and communication issues is as per appointment letter dated 1/1/2019.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	List of stakeholders available as per Details of Stakeholders Diamond Jubilee Mill FY 2018/19. The stakeholder includes authorities, local communities, contractors and vendors/suppliers. Internal stakeholders among all employees including local and foreign workers also available as per List of Local Workers and List of Foreign Workers. Records of communication including confirmation of receipt available as part of publicly available documents including records of Social Impact Assessment (SIA) Report, Management Plan on Social Impact Assessment, Complaint Book (Internal), Complaint Book (External.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	Sime Darby has established SOP for traceability and documented in Sustainable Supply Chain and Traceability version 2, year 2018, issue no 3, issue date Feb 2018. In the SOP stated where if there is contamination of RSPO/MSPO certified material during receiving, processing, storage and despatch, the mill/estate shall downgrade the materials following the downgrade from certified MSPO to Noncertified and the volume of downgraded material shall be recorded accordingly. The mill only received FFB from MSPO certified sister estate under Sime Darby Diamond Jubilee Estate, Bukit Asahan Estate, Serkam Estate or from diversion other SOU.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The management conduct regular inspections on compliance through Internal Audit conducted on timely basis.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The Mill Manager as Head of Operating Unit have the overall responsibility for the implementation of SOP and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Sighted the identified and assigned suitable employees to implement and maintain the traceability system by management is assistant manager; Appointed date: March 2019.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	The mill only received FFB from MSPO certified sister estate under Sime Darby Diamond Jubilee Estate, Bukit Asahan Estate, Serkam Estate or from diversion other SOU. Record FFB received, CPO and	Complied



Criterion / Indicator	Assessment Findings	Compliance
	kernel storage, sales and delivery was maintained and available at the office for review.	
	The daily records was summarise in FFB Receive Detail Report by Supplier. The records contain FFB, CPO, CPO, PK, Mill performance based on FFB processed, CPO storage tank and PK location.	
	The records of FFB received was recorded in FFB consignment note and FFB weighbridge ticket.	
	The FFB consignment was provided by the estate contains information such as:	
	i. Estate Name, Field and Block no.	
	ii. Date harvested	
	ii. Estimate tonnage	
	iii. Vehicle and trailer/bin no.	
	Sighted sampled FFB consignment as follows:	
	a. Consignment Note no.: 534601	
	i. Estate Name, Field and Block no.: Diamond Jubilee Estate, 2016B	
	ii. Date harvested: 15/6/2019	
	ii. Estimate tonnage: 4220 kg	
	iii. Vehicle and trailer/bin no.: MBT 6512	
	The ticket contain information as follows:	
	Weighbridge No. 107032	



Criterion / Indicator	Assessment Findings	Compliance
	i. The name, address and field/year planted: Diamond Jubilee Estate, 2016B	
	ii. The weight of FFB delivered: 4210 kg	
	iii. The delivery date and time: 15/6/2019, 6.01 pm	
	iv. Lorry No.: MBT 6512	
	b. Consignment Note no.: 534598	
	i. Estate Name, Field and Block no.: Diamond Jubilee Estate, 2007H2	
	ii. Date harvested: 15/6/2019	
	ii. Estimate tonnage: 7960 kg	
	iii. Vehicle and trailer/bin no.: JQS 8842	
	The ticket contain information as follows:	
	Weighbridge No. 107022	
	i. The name, address and field/year planted: Diamond Jubilee Estate, 2007H2	
	ii. The weight of FFB delivered: 7960 kg	
	iii. The delivery date and time: 15/6/2019, 4.34 pm	
	iv. Lorry No.: JQS 8842	
	c. Consignment Note no.: 33543	
	i. Estate Name, Field and Block no.: Bukit Asahan Estate, 2000H	



Criterion / Indicator	Assessment Findings	Compliance
	ii. Date harvested: 10/6/2019	
	ii. Estimate tonnage: 12360 kg	
	iii. Vehicle and trailer/bin no.: JJC 8165	
	The ticket contain information as follows:	
	Weighbridge No. 106761	
	i. The name, address and field/year planted: Bukit Asahan Estate, 2000H	
	ii. The weight of FFB delivered: 12590 kg	
	iii. The delivery date and time: 10/6/2019, 9.51 pm	
	iv. Lorry No.: JJC 8165	
	For CPO and PK sales and delivery was recorded in weighbridge and dispatch note. In the	
	i. Customer	
	ii. Destination	
	iii. Transporter	
	iv. Products	
	v. PO no	
	vi. Vehicle no.	
	vii. Date and time.	
	viii. net weight	



Criterion / Indicator	Assessment Findings	Compliance
	ix. Contract no.	
	Sighted sampled of weighbridge as follows:	
	a. Weighbridge no. 008976	
	i. Customer: SDP RCP	
	ii. Destination: Kernel Crushing Plant, Pulau Carey	
	iii. Transporter: Green Vision	
	iv. Products: Palm Kernel RSPO IP	
	v. PO no: 58419	
	vi. Vehicle no.: BPA 9815	
	vii. Date and time.: 15/6/2019, 9.23 am	
	viii. net weight: 28460 kg	
	ix. Contract no.: S/C-PSD/1906/PKO417	
	b. Weighbridge no.: 08973	
	i. Customer: SDP JOMA REF	
	ii. Destination: Klang	
	iii. Transporter: Teo Tuan Kwee	
	iv. Products: Crude Palm Oil	
	v. PO no: 335245	
	vi. Vehicle no.: JLQ 122	



Criterio	n / Indicator	Assessment Findings	Compliance
		vii. Date and time.: 15/6/2019	
		viii. net weight: 41440 kg	
		ix. Contract no.: S/C-PSD/1906/CPO0375	
4.3 Princ	ciple 3: Compliance to legal requirements		
Criterion	4.3.1 – Regulatory requirements		
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	SOU18 had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and PSQM sustainability team. SOU18 had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:	Complied
		Diamond Jubilee POM:	
		1. Energy commission license no: 000947/2019 (validity period 16/3/2019 – 15/3/2020) for 1054.85 kW installation capacity.	
		2. MPOB License: 500288804000 (validity period 1/10/18 – 30/9/19)	
		3. Water Abstraction License: 293/56/05.2019, validity 1/5/2019-30/4/2020	
		 Most of the CF for machineries was expired on 1/8/2019. The inspection for all machineries permit were done on 29/7/2018. The new CF yet to be issued by DOSH department. 	
		5. Authorized Entrant and standby person-NW-NMLK-AE-0994-R (valid until 16/7/2021)	



Criterio	ı / Indicator	Assessment Findings	Compliance
		6. Authorized Gas Tester – NW-NCC-AGT-0287-E (valid until 11/7/2021)	
		7. Electrical chargemen: PJ 10704032 (PJ-T-2-B-0356-2009), Category: A1	
		8. Engine Driver: MA038/2005 (Grade 1)	
		9. Engine Driver: MA042/2005 (Grade 1)	
		10. CePPOMETS: Assistant Mill Manager, attended training on 11-5/7/2019	
		11. CePSWaM: Mill Manager, will attend the training 19- 23/8/2019. Sighted email from HR Learning Developmet.	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register.	Diamond Jubilee POM had continued to list all relevant laws related to their operations in a legal requirement register. The CU had	Complied
	- Major compliance -	documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements as per Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.	
		List of applicable legal and other requirements was made available during the assessment.	
		The latest review of the LORR on Diamond Jubilee POM was done on 31/7/2019.	
		Comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating	



Criterion / Indicator		Assessment Findings	Compliance
		units and PSQM sustainability team. SOU18 had obtained and renewed license and permits as required by the law.	
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	DJPOM had updated the Legal Requirements Register as and when there are any new amendments or any new regulations coming into force. It was last updated on 31/07/2019.	Complied
		Tracking system to identify changes in the relevant regulations was 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.	
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	PSQM Department at SIME DARBY headquarters and the respective operating units were responsible to monitor compliance and to track update the changes in regulatory requirements aswell as monitoring the status of legal compliance. It was as per Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other	Complied
		Requirements dated 10 December 2008.	
Criterion	4.3.2 – Lands use rights		
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.	Sime Darby did not acquire land from landowners, but leased it directly from the government. There were no issues of land disputes.	Complied



Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	Diamond Jubilee Palm Oil Mill was situated on a freehold land - Grant #20102 Lot 228 which was shared with Diamond Jubilee Estate. The Land title (Grant) was held by Sime Darby Headquarters and copy of the land title was available during the audit. The land department at Sime Darby Headquarters was in the process of changing the ownership from – Gold Hope Plantations (Peninsular) Sdn. Bhd to Sime Darby.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The Mill being inside the Grant #20102 Lot 228 which was shared with Diamond Jubilee Estate had demarcated it boundary with a fence.	Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).	Sime Darby did not acquire land from landowners, but leased it directly from the government. There were no issues of land disputes.	Complied
	- Minor compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.	Sime Darby did not acquire land from landowners, but leased it directly from the government. There were no issues of land disputes.	Complied
	- Major compliance -		
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available.	Sime Darby did not acquire land from landowners, but leased it directly from the government. There were no issues of land	Complied
	- Minor compliance -	disputes.	
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.	Sime Darby did not acquire land from landowners, but leased it directly from the government. There were no issues of land	Complied
	- Major compliance -	disputes.	
4.4 Princ	ciple 4: Social responsibility, health, safety and employment co	ondition	
Criterion	4.4.1: Social Impact Assessment (SIA)		
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.	Sime Darby has conducted Social Impact Assessment for SOU 18 Diamond Jubilee on 12 -15 July 2016 done by the Sustainability	Complied
	- Minor compliance -	Strategy Unit, PSQM. The assessment covers Diamond Jubilee POM, Diamond Jubilee Estate, Bukit Asahan Estate and Serkam Estate. The objectives of the assessment are to identify the existing social issues and to develop social management plan. The assessment has involved the participation of stakeholders and attendance list of stakeholders was sighted. The issues raised by the stakeholders were recorded in the SIA report.	



Criterior	n / Indicator	Assessment Findings	Compliance
		Operating units in SOU 18 has established action plan of social impact assessment and was reviewed on annually basis. The management plan stated issue raised, action plan, and person responsible and monitoring period.	
		The mill has conducted meeting with NUPW representative and stakeholders on 3/8/2019 and 12/7/2019 respectively. However, issue raised in both meet conducted were not captured in the Social Management Plan established. Sampled issue raised during the meeting not captured in the plan as follows:	
		i. Cow trespassing at housing compound	
		ii. Alcohol drinker disturb local community	
		iv. Mill workers riding motorcycle dangerously when coming to work in the morning.	
Criterion	4.4.2: Complaints and grievances		
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	Sime Darby has established SOP for dealing with complaints and grievances and documented in Sustainable Plantation Management System Appendix 5, Flowchart and Procedure on Handling Social Issues, version 1 and dated 1/11/2008.	Complied
		Under Group policies and authorities GPA No 85 Whistleblowing provide an internal mechanism for reporting, investigating and remedying any wrongdoing.	



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	As per SOP established, all complaint and grievances is open to effected parties including internal and external stakeholders. The time to process the complaints or grievances is 2 weeks.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	The mill recorded all complaints from internal and external stakeholders in Complaint Book. No complaints or grievances received for the past year FY 2018. For housing complaint/repair, the mill implemented the Housing Repair Requisition Form.	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	Noted during interview with employee and stakeholders, shows the understanding complaint and grievance process. There is no grievance recorded since the last audit. Only request for maintenance housing are made by workers.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	The complaint record for request for maintenance are available and kept for 10 years according to the Standard Operation Manual Section 4; Sub-section 4.2.3 Control of Documents.	Complied
Criterion	4.4.3: Commitment to contribute to local sustainable development		
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.	Contributions were made based on consultations results as per sample as following: i. Booth for Career & Anti-Drug Week program at school SMK Simpang Bekoh dated 25/4/2019	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	- Minor compliance -	ii. Blood donation campaign date 16/2/2019	
Criterion	4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	The CU continued to adopt the SDPSB's Occupational Safety and Health (OSH) policy. The policy had been communicated to all levels of employees through briefings and training. The policy is also available in Bahasa Malaysia and is being displayed at the notice boards at mill, estate office and Muster Ground.	Complied
4.4.4.2	 The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). 	a) The policy has been established and elaborated in item 4.4.4.1 above. The policy amongst others has mentioned the details of the policy statement and the direction of the organisation towards implementing ESH practices. The clause "A safety and health policy, which is communicated and implemented' is mentioned in the policy. Safety briefing to employees & contractors was made in several training sessions inclusive of safety requirement of the organisation. Details of training records in 4.4.6.3 showed that trainings had been conducted in relation to safety and health for the mill employees. b) The risk of all operations were assessed and documented under HIRARC. HIRARC was reviewed on 9/7/2019 and approved by the Manager. Mill activities was identified and risk assessed with respect to weighbridge, office, ramp, sterilization, threshing station, pressing station, clarification station, depericarping station, CPO storage, effluent plant, water treatment, laboratory, store, boiler, engine room.	Complied



Criterion / I	ndicator	Assessment Findings	Compliance
e)	The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health	c) DJ POM had conducted awareness and training programme which included safe working practices and the observation of precautions attached to the products.	
	(Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.	Training and briefing on the operations were provided to all employees to educate them on safe working practices and to ensure applicable precautions are adhered. Training for	
f)	The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations	employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc.	
	and collective agreements.	The employees such as the storekeepers, Boilerman, workers	
g)	The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept	attending reception station, fruit handling station, sterilisation station, threshing, etc were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner.	
	ant the concerns of employees and any remedial actions taken shall be recorded.	Details of training records in 4.4.6.3 showed that trainings had been conducted in relation to safety and health for the mill employees.	
h)	Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.	d) All workers were provided with appropriate PPE and replaced when damaged. PPE issuance and replacements records were	
i)	Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each	verified by the auditors. It was also observed that PPE was used by workers working in the fields as per recommend by CHRA.	
		Records of training for were maintained at the office for	
	Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.	reference and verification, and were verified during the audit. Some of the latest training conducted were:	
- N	lajor compliance -	Based on the HIRARC carried out at Mll the types of PPE for the various activity were identified.	



Criterion / Indicator	Assessment Findings	Compliance
	i. Boiler/Engine operator – Safety Helmet, Semi leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff.	
	ii. Workers who handled chemicals – N95 respirator, anti-mist goggles, wellington boots, apron.	
	e) SOP of handling of chemicals is available. The document SD/SDA/PSQM (ESH)/202-OH4 titled "chemical safety management" dated 26/02/2015. There in is shown requirement & selection of chemicals, assessment of chemicals hazards, selection of supplier and transportation of chemicals. Storage, handling and training of such is also stated in the procedure in accordance to OSH (USECHH 2000) The guidelines are adequate to address the requirement needed. The manual of the SOP is filed and functional.	
	f) The Mill Manager through letters appointed the executives as the persons in charge for environment / quality management system for the entire mill operations. The Assistant Manager was appointed person in charge for Environmental/Quality Management systems related internal/external certification for Supply Chain Certification System (SCCS) as per appointment letter dated 01/01/2019.	
	Their role among others are to oversee the safety & health issues and compliance of the staff/workers/contractors engaged inside the mill. The Mill Manager in turn was appointed as the Commander for safety and health role which also covers the role of Chairman for the ESH committee. The appointment letter dated 01.01.2019 issued by the Zone Head was sighted and verified. All appointments have a validity period.	



Criterion / Indicator	Assessment Findings	Compliance
	g) The management had conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare were discussed openly. OSH/ESH meetings were conducted on quarterly basis. Work place inspections and reviews of accident records were discussed during the OSH meetings. No unresolved safety and health issues were noted.	
	ESH committee Chairman was the Mill Manager	
	Appointment letters for OSH committee members dated 01/01/2019 was sighted.	
	Records showed that OSH/EHS meetings were held on:	
	25/07/2019, 24/04/2019, 29/01/2019 and 29/10/2018.	
	h) Accident and Emergency procedures have been established, the following were reviewed:	
	i) SDPSB / 01/08 - Accident Investigation and Investigation Procedure, dated 3 rd March, 2008	
	ii) SDPSB / 01 / 08 - Crisis Management & Emergency Response Plan dated 3 rd March, 2008 which addressed responses to emergency situation related to bund break, fire breakout, CPO pipe burst & fire, flood and chemical spill.	
	iii) Emergency Evacuation Procedures	
	i) The ERT consisting of trained First Aiders, field staffs, Mandores, Admin clerk, workshop operator and Security personnel. Interviews with estate staffs and mandores revealed that they had	



Criterior	n / Indicator	Assessment Findings	Compliance
		understood and were aware of the emergency procedures requirements. It was observed that first aid boxes were available at all the sites audited. The boxes were checked on a monthly basis by the Medical Assistants. Records of replenishment were verified by the auditor.	
		j) DJPOM had monitored the occupational injuries using Lost Time Accident (LTA) metrics. The records, JKKP 8, were available during the assessment and were verified by the auditor. No accident reported for 2019. JKKP 8 was sent to DOSH on 15/01/2019.	
Criterion	4.4.5: Employment conditions		
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the	The Social and Humanity Management Policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations.	Complied
	employees. - Major compliance -	The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate. Latest COBC briefing for mill workers was conducted on 30/7/2018.	
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.	SIME DARBY 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	Complied
	- Major compliance -	regardless of race, caste, nationality, gender, sexual orientation,	



Criterio	n / Indicator	Assessment Findings	Compliance
		union membership, political view, religion and/or age. Latest COBC briefing for mill workers was conducted on 30/7/2018.	
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements.	Employment contract are available and explained in language that understood by workers and signed by the workers	Complied
	The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	Besides, for workers who workers more than 2 years (Indonesian) and 3 years (other nationalities) have signed an extension contract (version: EMP04/INDO/2017/01).	
		Interviewed with the workers confirmed that they were understood on the terms and conditions outlined in the employment contract. They were also briefed on the terms and condition during induction training.	
		Sighted the sampled employment contracts as below:	
		i. Employee ID: 10555	
		ii. Employee ID: 46704	
		iii. Employee ID: 62012	
		iv. Employee ID: 90606	
		v. Employee ID: 92906	
		vi. Employee ID: 107027	
		vii. Employee ID: 19296	
		viii. Employee ID: 120303	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the	Based on the payment voucher checked, daily rate for contract workers is around (RM50 - 560) which more than minimum wages	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	employment contract agreed between the contractor and his employee. - Minor compliance -	of RM 42.30/day. Payslip/cash voucher of the workers were sighted that it is according to the employment contract. The records are documented and available for review.	
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	The mill have employed local and foreign workers. All the mill workers are under direct employment and under contract. Sighted the master list of the workers having the information of full names, gender, date of birth, job description and other relevant information.	Complied
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance -	Employment contract are available and explained in language that understood by workers. Besides, for workers who workers more than 2 years (Indonesian) and 3 years (other nationalities) have signed an extension contract (version: EMP04/INDO/2017/01). Interviewed with the workers confirmed that they were understood on the terms and conditions outlined in the employment contract. They were also briefed on the terms and condition during induction training. The contract was signed by the workers and sampled of contracts as follows: i. Employee ID: 10555 ii. Employee ID: 46704 iii. Employee ID: 62012	Complied



Criterion	/ Indicator	Assessment Findings	Compliance
		iv. Employee ID: 90606	
		v. Employee ID: 92906	
		vi. Employee ID: 107027	
		vii. Employee ID: 19296	
		viii. Employee ID: 120303	
		Interviewed with the foreign workers confirmed that they have freedom to go out from the compound during off day. They are volunteered to surrender the passport to the management for safety reason as they worried the passport will be lost if kept by themselves. They have signed on the passport retain	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	Mill and estate have employed local and foreign workers. All the mill and estates workers are under direct employment and under contract. The payslip has included basic pay, overtime, allowances, working days, deduction of salary such as Union, electricity, and temple and mosque fund.	Complied
		Sighted and verified the sampled of payslip for employee with ID no. for the month of March and April 2019 as follows:	
		i. Employee ID: 10555	
		ii. Employee ID: 46704	
		iii. Employee ID: 62012	
		iv. Employee ID: 90606	
		v. Employee ID: 92906	



Criterio	n / Indicator	Assessment Findings	Compliance
		vi. Employee ID: 107027	
		vii. Employee ID: 19296	
		viii. Employee ID: 120303	
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet	There is individual punch card for Sime Darby Plantation-Diamond Jubilee POM to record the accurate working hours and overtime and recorded in Mill Daily Attendance Report.	Complied
	the legal requirements applicable. - Major compliance -	In case the worker is on leave or absence, it is recorded in the same system.	
		Sighted the attendance records and punch cards for the month of March and April 2019 for employee as follows:	
		i. Employee ID: 10555	
		ii. Employee ID: 46704	
		iii. Employee ID: 62012	
		iv. Employee ID: 90606	
		v. Employee ID: 92906	
		vi. Employee ID: 107027	
		vii. Employee ID: 19296	
		viii. Employee ID: 120303	
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	Pay slips of all employees (check roll) are available as evidence of salary payment. The pay slip contain the following information :	Complied



Criterior	/ Indicator	Assessment Findings	Compliance
	- Major compliance -	i. Earnings - Basic Salary (Daily Rated Work, Work on Rest Day and Work on Holiday), Overtime (Week days, Rest days and Holiday)	
		ii. Deduction - Union fee (NUPW & AMESU),SOCSO, EPF , electricity deduction and others	
		Observed that the wages and overtime payment documented on the pay slips are in line with legal requirement and as stated in the employment contract	
		Sighted and verified the sampled of payslip for employee with ID no. for the month of March and April 2019 as follows:	
		i. Employee ID: 10555	
		ii. Employee ID: 46704	
		iii. Employee ID: 62012	
		iv. Employee ID: 90606	
		v. Employee ID: 92906	
		vi. Employee ID: 107027	
		vii. Employee ID: 19296	
		viii. Employee ID: 120303	
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.	Free water supply and accommodation was supplied to the workers. Facilities such as clinic, football field, temples, community hall and mosque were available on site. Government schools were found constructed inside or nearby the plantations.	Complied



Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	The estate & mill were located nearby the town where the workers could be easily access to the foods and goods. Access to foods was adequately sufficient and affordable through interviewed with the workers. Free water supply and accommodation was supplied to the workers.	Complied
		Facilities such as clinic, football field, temples, community hall and mosque were available on site. Government schools were found constructed inside or nearby the plantations.	
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Sime Darby Plantation Berhad has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights.	Complied
		The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate. Latest COBC briefing for mill workers was conducted on 30/7/2018.	
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and	Sime Darby 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. The policy was developed in Bahasa Malaysia and English.	Complied
	negotiate their work conditions. Employees exercising this right	The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed	



Criterion / Indicator		Assessment Findings	Compliance
	should not be discriminated against or suffer repercussions. - Major compliance -	at various notice board within the estate. Latest COBC briefing for mill workers was conducted on 30/7/2018.	
		Interviewed with the workers confirmed that they understood on the policy and aware that they are freely to join any association.	
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	Sime Darby has established policy on Child Protection and Social documented in Social and Humanity Management Policy signed by the Managing Director dated 15/1/2015.	Complied
Criterion	4.4.6: Training and competency		
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major 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.	Complied
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.	DJPOM continued to identify training needs of individual employees prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.	Complied
	- Major compliance -	The Mill had established the training plan and documented in Training Requirements for Operating Unit – Diamond Jubilee Mill. 32 training requirements has been identified for FY 2019.	
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function	DJPOM continued to have continuous training programme planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the	Complied



Criterio	n / Indicator		Assessme	nt Findings		Compliance
	and responsibility in accordance to the documented training procedure.		nented training procedure nent training programs sigh			
	- Minor compliance -	Some	of the latest trainings verif	ied during this	audit were:	
		N0	Training	Date	No. of Participants	
		1	Boiler Water Treatment	24/07/19 9 11/07/19 19	9	
		2 First Aid	First Aid		19	
		3	3 5S 11/07/	11/07/19	16	
		4	Hearing conservation	11/07/19 11/07/19	24	
		5	5 Chemical Handling		21	
		6	HIRARC	09/07/19	8	
		7	Schedule Waste	04/07/19	19	
4.5 Princ	ciple 5: Environment, natural resources, biodiversity and ecosy	stem s	services			
Criterion	4.5.1: Environmental Management Plan					
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.	Biodiv	Darby Plantation Sdn Bhd h ersity Policy signed by Datu and Environmental Manage	k Franki Antho	ny Dass on January	Complied



Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Management Plan, Waste Management Plan, Water Management Plan, HCV Area and Pollution Prevention Plan.	
a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations - Major compliance -		DJPOM continued to have established the Environmental Management Plan which covered EAI/EIE Management Plan, Waste Management Plan, Water Management Plan, HCV Area and Pollution Prevention Plan. The plan was reviewed on 09/07/2018 with no changes being made.	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	DJPOM had established an environmental improvement plan to mitigate the negative impacts and to promote the positive ones. The latest Environmental Management Plan was for FY 2019. The plan has been monitored quarterly. In the plan stated the person in charge to monitor the implementation on each plan as per programmed. The latest reviewed done during Management Review Meeting on 23/7/2018.	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Based on the Standard Operation Manual; subsection 5.4; Planning and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure, POM and Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts. The continual improvement plan had programs to promote the positive impacts. For example, to reduce any run-off pesticides to land, to eliminate traces of oil spillage at the workshop/tractor parking bay, to reduce the released exhaust emission to air, to reduce massive land contamination at the landfill area and etc.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	DJPOM continued to have continuous awareness and training programs planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. The Mill had established the annual training program that covers all MSPO requirement. The training programme reviewed annually. The 32 awareness and training program requirements for Operating Unit on for 2019 included training on Environmental Management and Environmental Improvement. These were evident form the document training programs sighted for 2018 and 2019.	Complied
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	The management continued to have regular meetings with workers where concerns of workers about the environmental quality are discussed. This was discussed at the quarterly held ESH committee meetings. Records showed that OSH/EHS meetings were held on: 25/07/2019, 24/04/2019, 29/01/2019 and 29/10/2018.	Complied
Criterion	4.5.2: Efficiency of energy use and use of renewable energy		
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance -	DJPOM had established an Energy Management Plan which focused on the efficiency usage of non-renewable energy and renewable energy. The management plan has categorised three type of energy for the management plan, Electricity, Diesel and Fiber and Shell. For boiler fuel, they targeted the ratio of 90% fiber and 10% shell.	Complied
		The mill monitored fuel, electricity and water usage. For 2019 the usage per Ton of FFB were:	



Criterion / Indicator		Assessi	ment Findings		Compliance
	Month	Water (m3)	Electricity (KWH)	Diesel (Litres)	
	Jan	1.35	0.77	0.08	
	Feb	1.42	0.90	0.06	
	Mar	1.30	0.85	0.08	
	Apr	1.36	1.00	0.06	
	May	1.25	1.73	0.08	
	Jun	1.53	1.89	0.06	
	was for 2019 a	as follows: Month Jan	Diesel (Litres)		
		Feb	0.31		
		Mar	0.39		
		Apr	0.30		
		May	0.37		
		Jun	0.27]	



Criterion / Indicator		Assessment Findings	Compliance
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	DJPOM had established the Energy Management Plan which focused on the efficiency usage of non-renewable energy and renewable energy. The management plan has categorised three type of energy for the management plan, Electricity, Diesel and Fiber and Shell. For boiler fuel, they targeted the ration of 90% fiber and 10% shell. The estimates for direct usage of non-renewable energy for their energy inclusive of fossil fuel, and electricity to determine	Complied
		operations, inclusive of fossil fuel, and electricity to determine energy efficiency of their operations were available in the annual budget and budget projections.	
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Though DJPOM had established an Energy Management Plan which focused on the efficient usage of non-renewable energy currently there was no opportunity for the use of renewable energy.	Complied
Criterion	4.5.3: Waste management and disposal		
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Records showed that DJPOM had identified waste products and sources of pollution and documented them in the Waste Management Plan. Waste had been categorized into four groups:	Complied
		v. Domestic Waste i.e. Rubbish and Sewage	
		vi. Industrial Waste i.e. Scrap Metal, EFB, POME	
		vii. Scheduled Waste i.e. used lubricant, used lubricant container, Spent Chemicals, Clinical waste.	
		viii. Recycle waste: Paper, plastics, glass and metal	



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill byproducts by converting them into value-added products. - Major compliance -	DJPOM had established a waste management plan FY 2019 and has identified four category of waste and source pollution. The waste has been categorized into three group: i. Domestic Waste ii. Industrial Waste iii. Scheduled Waste iv. Recyclable waste At time of visit it was observed that all Scheduled wastes were stored in designated area and disposed with licensed contractors.	Complied
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 - 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
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Domestic waste from DJPOM was disposed as such to minimize the risk of contamination of the environment and watercourse. Proper disposal of Domestic waste carried out as per the company procedures. The procedures are fully understood by workers and managers. Workers interview reveal that they are aware of the zero	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		burning policy including domestic waste was not allowed to be burned.	
		Domestic waste was removed thrice a week from living quarters and sent to government approved landfills by Majlis Perbandaraan Jasin. Records of domestic waste removal were sighted.	
Criterion	4.5.4: Reduction of pollution and emission		
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	For DJPOM the assessment of all polluting activities was established based on DOE licence compliance schedule which included schedule waste, storage and disposal record, POME final discharge BOD and boiler stack emission sampling.	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	For DJPOM, GHG emission identified from POME, fuel consumption and grid electricity utilization. 5 years plan for GHG reduction (phase I, 20 mills (Malaysia) was sighted.	Complied
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations. - Major compliance -	Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system through land application as per approval licensed by DOE. The limit for Final discharge BOD allowed was 5000mg/L. The mill monitored the discharge quality by conducting effluent water sampling analysis on monthly basis. Parameter monitored are 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.	Complied



Criterion / Indicator		Assessment Findings	Compliance
		Observed the effluent analysis report to DOE for the month of July 2019 dated 01/07/2019 sighted at the mill. Final discharge conforms to parameter limits for land application.	
Criterion	4.5.5: Natural water resources		
4.5.5.1	The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:	Water management plan for 2019 was established and documented in the Environmental Plan which involved water catchment, water treatment and water sampling analysis.	Complied
	a) Assessment of water usage and sources.	The plan reviewed annually and monitored on quarterly basis. The management plan focused on:	
	b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.	i. To monitor the quality of main water inlet/outlet for pollutants from mill operations.	
	current activities. c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).	ii. To monitor usage of treated water on monthly basis iii. Protection of water course and wetland. iv. To reuse/recycle wastewater Water consumption was monitored monthly basis.	
	- Major compliance -	, , , , , , , , , , , , , , , , , , , ,	
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.	As per DOE requirements, Diamond Jubilee Palm Oil Mill practiced land application and the limit allowed for the Biochemical Oxygen Demand (BOD) discharge was <5000 mg/l. In 2018 a total of	Complied
	- Major compliance -	70,236.36 m3 of POME had been used for land application.	



Diamond Jubilee POM continued to use the established and documented SIME DARBY's manual and SOP for all operation as below: i. EQMS Standard Operation Manual (SOM) year 2008. ii. EQMS Standard Operation Procedure (SOP) iii. Mill Quality Management Manual ver. 1, 2008 This documents provides guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from the reception station, fruit handling station, sterilisation station, threshing, empty bunch pressing, clarification, depericarping station, effluent treatment/waste management, kernel recovery station and water treatment plant.	Complied
The monitoring of the mill process was made through the daily inspection by the Mill Engineer. All process parameters are documented and summarized in a daily report. At operational level, Mill Advisory will visit the mill. During the visit the Mill Advisory (MA) Report No: SOU 18/DJM/01/2018, date of visit: 6-8 August 2018 was sighted. In conclusion DJPOM had implemented best practices.	Complied
	documented SIME DARBY's manual and SOP for all operation as below: i. EQMS Standard Operation Manual (SOM) year 2008. ii. EQMS Standard Operation Procedure (SOP) iii. Mill Quality Management Manual ver. 1, 2008 This documents provides guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from the reception station, fruit handling station, sterilisation station, threshing, empty bunch pressing, clarification, depericarping station, effluent treatment/waste management, kernel recovery station and water treatment plant. The monitoring of the mill process was made through the daily inspection by the Mill Engineer. All process parameters are documented and summarized in a daily report. At operational level, Mill Advisory will visit the mill. During the visit the Mill Advisory (MA) Report No: SOU 18/DJM/01/2018, date of visit: 6-8 August 2018 was sighted.



Criterion / Indicator		Assessment Findings	Compliance	
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	As per all Sime Darby Mills, DJPOM had established and documented a 5 year business plan covering period 2019 – 2024. The plan reviewed annually, latest reviewed was done in May 2018 prior to end of financial year 2019. The plan includes environment, social (workers and staffs welfare), and health and safety component and associated capital expenditure CAPEX) for improvement.	Complied	
Criterion	4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	The contract documents template were included with the provision for contractors to comply with all Sime Darby Plantation requirements including Code of Business Conduct (COBC) particularly under items 7 and 8 of the COBC which is made available online at www.simedarby.com for the Vendor and its Representatives review. Diamond Jubilee POM is only received FFB from own certified supply bases and other certified FFB from other SOU. There was no smallholders or outside crop purchased by the mill.	Complied	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	KSE Turbo has submitted invoice to the mill on 18/1/2019. In the invoice stated the payment term of 30 days. The document has been uploaded to the MEX system by the mill on 18/1/2019. Refer document no. 150001055. The finance department made payment to KSE Turbo on 8/3/2019, 49 days after the documents uploaded into the system. This was against the payment term of 30 days agreed by both mill and contractors.	Complied	



Criterio	n / Indicator	Assessment Findings	Compliance		
Criterion 4.6.4: Contractor					
understand the MSPO requirements and shall provide the required su		Diamond Jubilee POM is only received FFB from own certified supply bases and other certified FFB from other SOU. There was no smallholders or outside crop purchased by the mill.	Complied		
	- Major compliance -	For other services, the pricing mechanism was done documented in contract agreement between Sime Darby and the contractors. The contract and pricing mechanism was agreed by both parties.			
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	All contracts were fair legal and transparent and agreed with both parties. In the contracts stated the contract duration, term and condition, indemnity, responsibilities of Sime Darby Plantation and estate management, notices, cost, force majeure, non-assignability, misc, interpretation and rate of payment.	Complied		
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	The requirement of accepting MSPO accredited auditors to audit against the contractors was communicated to the contractor through MSPO training and formal letter to contractor. Example seen for contractor: Teo Tuah Kwee Sdn Bhd, signed on 20.08.18.	Complied		



Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings Based on the findings during the assessment Strategic Operating Unit (SOU 18) Diamond Jubilee Palm Oil Mill Certification Unit complies with the MS 2530- 3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill. It is recommended that the certification of Strategic Operating Unit (SOU 18) Diamond Jubilee Palm Oil Mill Certification Unit is approved and/or continued. Report Prepared by **Acknowledgement of Assessment Findings** Name: Name: SYAHRUL BIN SARAMLAH Muhammad Fadzli Masran Company name: Company name: THE CHINA ENGINEERS (MALAYSIA) BSI Services Malaysia Sdn. Bhd. SDN BHD Title: Title: MANAGER Client Manager Signature: Signature: THE CHINA ENGINEERS (MAI AYSIA) SDN BHD BUKIT ASAHAN ESTATE RAMLAH SYAHRU Date: 28/11/2019 **Date:** 26/11/2019



Appendix A: Assessment Plan

Date	Time	Subjects	MFM	SK
Sunday 04/08/2019	PM	Audit Team Travelling	√	√
Monday 05/08/2019	08.30 - 09.00	Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√	√
Bukit Asahan Estate 09.00 – 12.30 Field visit, boundary inspection, field operations, staff workers interview, buffer zone, HCV area, If implementation, OSH&ERP, workshop, storage ar (agrochemical, fertilizer, lubricant etc), agrochemical mixi area, Schedule waste management, worker housing, clin Landfill etc.		V	√	
	12.30 – 13.30	Lunch	√	√
	13.30 – 16.30	Continue with document review Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition,	√ √	√ √
		P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting (if any)		·
	16.30 - 17.00	Interim Closing briefing.	V	√
Tuesday 06/08/2019 Diamond Jubilee POM	08.30 – 12.30	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	V	V
	12.30 – 13.30	Lunch	√	√
	13.30 – 16.30	Continue with document review (MSPO part 4) P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition P5: Environment, natural resources, biodiversity and ecosystem services P6: Best practices	V	V
	16.30 - 17.00	Interim Closing briefing.	√	√



Date	Time	Subjects	MFM	SK
Wednesday 07/08/2019 Diamond Jubilee Estate	08.30 – 12.30	P.30 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.		V
	09.30 – 12.00	Stakeholder interviews (combined mill and estate's Stakeholders)	√	-
	12.30 – 13.30	Lunch	$\sqrt{}$	√
	P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and condition,	Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices,	\	√
	16.30 – 17.00	Preparation of audit report	√	√
	17.00 – 17.30	Closing Meeting	√	√



Appendix B: List of Stakeholders Contacted

List of Stakeholders Contacted				
Internal Stakeholders	Union/Contractors/Local Communities			
Field workers Mill workers NUPW representative Gender committee Local & foreign general workers	Neighbouring oil palm plantation (Amertha Plantation) Cattle owners (Bella Farm) Vendors & contractors			
Government Departments	NGO			
Badan Kawal Selia Air Melaka SK Asahan SJK(T) Ladang Bukit Asahan	Nil			

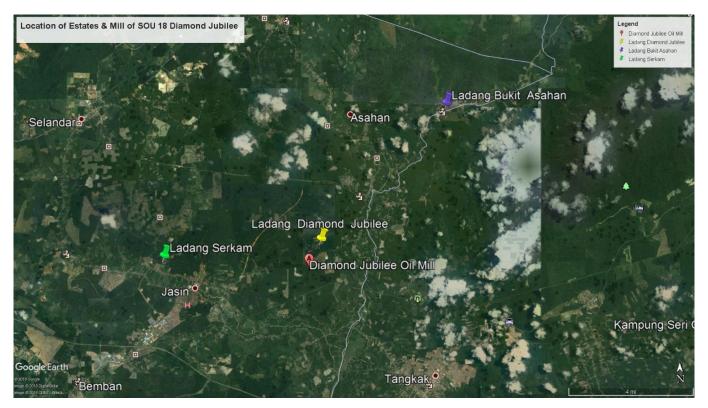


Appendix C: Smallholder Member Details

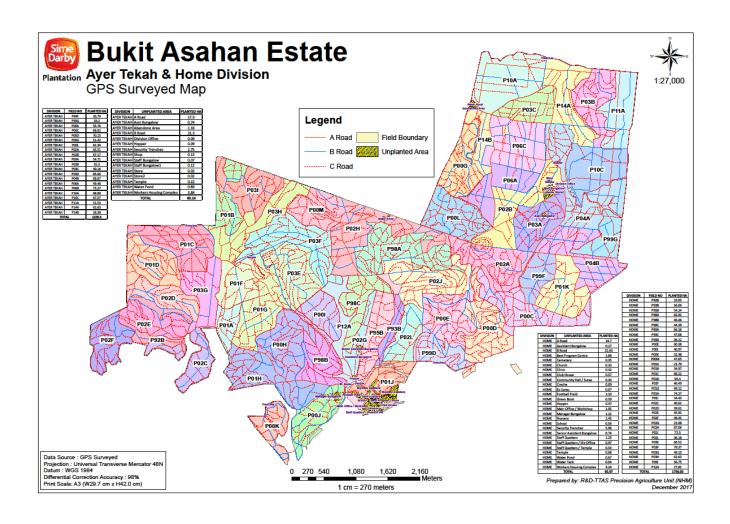
No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	NA			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
	TOTAL	•		



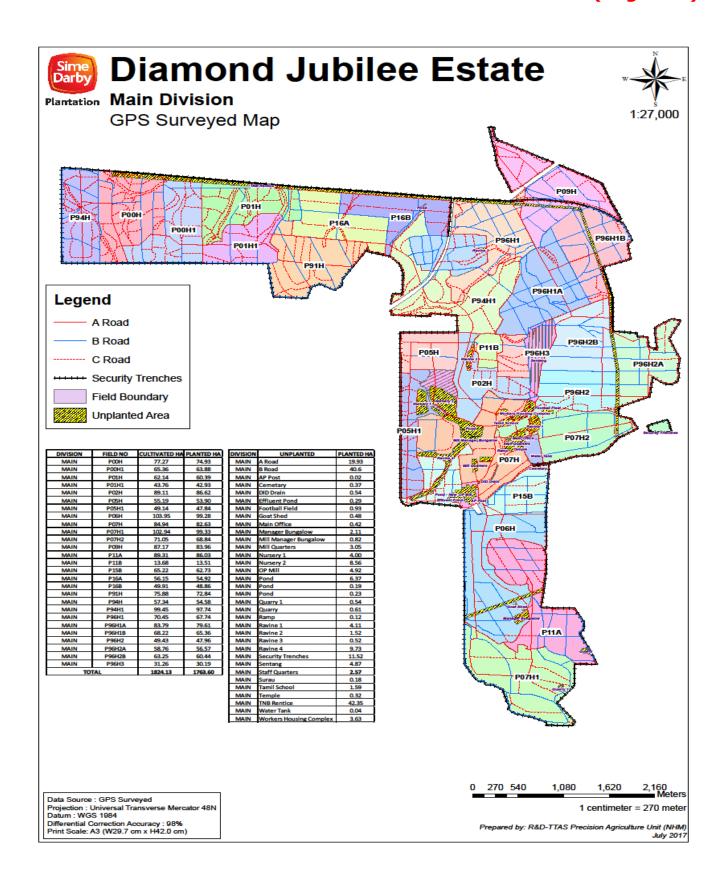
Appendix F: Location and Field Map



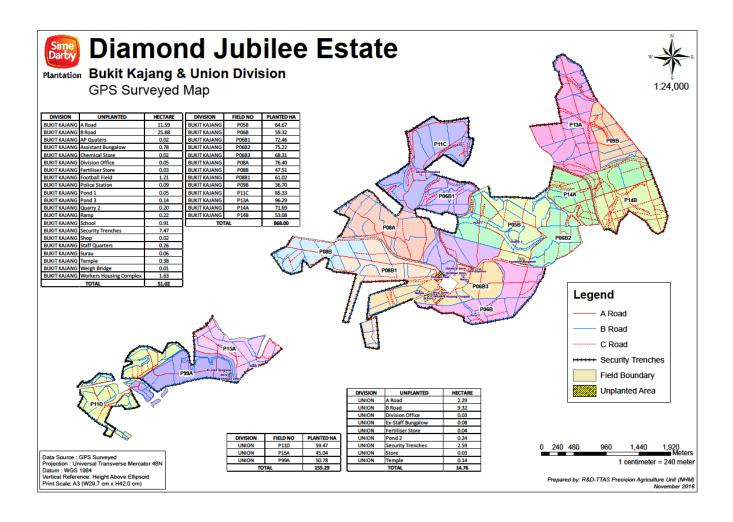














Appendix G: List of Abbreviations

BOD Biochemical Oxygen Demand

CB Certification Bodies

CHRA Chemical Health Risk Assessment COD Chemical Oxygen Demand

CPO Crude Palm Oil EFB Empty Fruit Bunch

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

FFB Fresh Fruit Bunch

FPIC Free, Prior, Informed and Consent

GAP Good Agricultural Practice

GHG Greenhouse Gas

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

ISCC International Sustainable Carbon Certification

LD50 Lethal Dose for 50 sample
MSPO Malaysian Sustainable Palm Oil
MSDS Material Safety Data Sheet

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment

RTE Rare, Threatened or Endangered species
SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure