

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

Sime Darby Plantation Berhad

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

Certification Unit: SOU 7 – Bukit Kerayong Palm Oil Mill and Supply Base

Location of Certification Unit: Jalan Bukit Kerayong, 42200 Kapar, Selangor, Malaysia

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

Report Number: 3091799

Assessment Conducted by:

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Section 1: Executive Summary

1.1 Organizational Information and Contact Person				
MPOB License	Bukit Kerayong Oil Mill: 526188002000 (expiry date 31/1/2021) Bukit Kerayong Estate: 525572002000 (expiry date 31/12/2020) Bukit Cheraka Estate: 526188002000 (expiry date 31/7/2020)			
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 7) - Bukit Kerayong Palm Oil Mill, Jalan Bukit Kerayong, 42200 Kapar, Klang, Selangor, Malaysia			
Group name if applicable:	Strategic Operating Unit (SOU 7) - Bukit Kerayong Palm Oil Mill			
Subsidiary of (if applicable)	N/A			
Contact Person Name	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr Senthilkumaran Gopal (Mill Manager)			
Website	www.simedarbyplantation.com E-mail kks.bk.kerayong@simedarlplantation.com			
Telephone	+603-78484379 (Head Office) +6013-2086959 (Mill)	Facsimile	03-78484356 (Head Office)	

1.2 Certification Information					
Certificate Number	Mill : MSPO 682049				
	Estate: MSPO 6903	368	T		
Issue Date	14/03/2018		Expiry date	13/03/2023	
Scope of Certification	Mill: Production of S	Sustainable Pal	m Oil and Palm Oil	Products	
	Estate: Production of	of Sustainable	Oil Palm Fruits		
Stage 1 Date		N/A (The certification unit is RSPO certified)			
Stage 2 / Initial Assessm	ent Visit Date (IAV)	19-21/12/201	17		
Continuous Assessment	Visit Date (CAV) 1	23-25/1/2019)		
Continuous Assessment	Visit Date (CAV) 2	20-22/1/2020)		
Continuous Assessment	Visit Date (CAV) 3	NA			
Continuous Assessment	Continuous Assessment Visit Date (CAV) 4				
Other Certifications					



Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 550181	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2013; Malaysian National Interpretation: 2014; RSPO Supply Chain Certification June 2017 for CPO Mills (Module D: Indentity Preserve)	BSI Services Malaysia Sdn Bhd	14/04/2021

1.3 Location of Certification Unit						
Name of the Certification Unit	Site Address		of the site office			
(Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)		Longitude	Latitude			
Bukit Kerayong Palm Oil Mill	Kilang Kelapa Sawit Bukit Kerayong, Jalan Bukit Kerayong, 42200 Kapar, Klang, Selangor, Malaysia	101° 22′ 29.6″ E	3° 11′ 12.7″ N			
Bukit Kerayong Estate	Bukit Kerayong Estate, P.O. Box 204, 42200 Kapar, Klang, Selangor, Malaysia	101°21′ 00.5″ E	3°10′ 31.3″ N			
Bukit Cheraka Estate	Bukit Cheraka Estate, P.O. Box 202, 45809 Jeram, Selangor, Malaysia	101°22′ 01.7″ E	3°13′38.6″ N			

1.4 Plantings & Cycle					
Estata			Age (Years) - ha	1	
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Bukit Kerayong Estate	223.66	1,565.06	1,010.44	-	-
Bukit Cheraka Estate	415.33	1,262.21	1,492.60	230.51	-
Total	638.99	2,827.27	2,503.04	230.51	-

1.5 FFB Production (Actual) and Projected (tonnage)					
Producer Group	Projected from last audit (Apr 2019 – Mar 2020)	Actual production (Jan 2019 – Dec 2019)	Projected production for next 12 months (Jan 2020 – Dec 2020)		
Bukit Kerayong	71,145.50	57,986.75	59,457.87		
Bukit Cheraka	59,809.22	59,623.43	73,881.21		
Dusun Durian	-	104.75*	-		
Total	130,954.72	117,714.93	133,339.08		

Remarks: The has received diversion of MSPO certified crop from Dusun Durian Estate (SOU 8 East POM and supply base) in 2019.



1.6 Certified CPO / PK Tonnage						
Mill	Estimated (Previous Year) (Apr 2019 – Mar 2020)	Actual (This Year) (Jan 2019 – Dec 2019)	Forecast (Next Year) (Jan 2020 – Dec 2020)			
	CPO (OER: 21.00%)	CPO (OER:21.09%)	CPO (OER:21.14%)			
Mill Capacity:	27,500.49	24,826.08	28,187.88			
30 MT/hr	PK (KER: 5.50 %)	PK (KER:5.12 %)	PK (KER:5.51%)			
	7,202.51	6,027.00	7,346.98			

1.7 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Kerayong Estate	2,799.16	4.27	449.56	3,252.99	86.04%
Bukit Cheraka Estate	3,400.65	55.52	191.45	3,647.62	93.00%
Total	6,199.81	59.79	641.01	6,900.61	

Remarks:

For Bukit Kerayong Estate, there was difference in Total planted area and Infrastructure & other hectarage, due to the ex-line site area which has been demolished and planted with oil palm at 1.4 ha.



1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the 2nd Annual Surveillance Assessment Certification Assessment of SOU 7 – Bukit Kerayong Palm Oil Mill and Supply Base located in Jalan Bukit Kerayong, 42200 Kapar, Klang, Selangor, Malaysia comprising 1 mill and 2 supplying estates and infrastructure.

The assessment was conducted onsite to assess the compliance of the certification unit against the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills.

The onsite assessment was conducted on $20 - \frac{22}{1}2020$.

Based on the assessment result, SOU 7 – Bukit Kerayong Palm Oil Mill and Supply Base complies with the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills.



Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd, Suite 29.01 Level 29 The Gardens North Tower, Lingkaran Syed Putra, Mid Valley City, 59200 Kuala Lumpur Tel +60392129638 Fax +60392129639 Nicholas Cheong: Nicholas.Cheong@bsigroup.com

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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 20 - 22/1/2020. The audit programme is included as Appendix A. The approach to the audit was to treat the SOU 7 - Bukit Kerayong Palm Oil Mill 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. the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder and MS 2530-4:2013 Part 4: General principles for palm oil mills 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.

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)
Bukit Kerayong Palm Oil Mill	/	/	/	/	/
Bukit Kerayong Estate	/	/	/	/	/
Bukit Cheraka Estate	/	/	/	/	/

Tentative Date of Next Visit: January 18, 2021 - January 20, 2021

Total No. of Mandays: 6 Mandays

BSI Assessment Team:

<u>Muhammad Fadzli Masran – Lead Assessor</u>

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.

<u>Ismadi bin Ismail – Team Member</u>

He holds Diploma in Planting Industry Management from MARA Institute of Technology, Kuantan Pahang. 24 years of working experiences with various plantation companies and skills in Best Agriculture Practices (GAP) for plantation. Fully trained in CoP, MSPO and OSHAS. Qualified as Lead Auditor/Auditor for MSPO and CoP. Involved in MSPO assessment since 2017. Completed and certified MSPO Auditor course in 2017 held by SGS (M) Sdn Bhd and ISO 9001:2015 lead auditor course by TOMC. Able to speak Bahasa Malaysia and English. During this assessment, he assessed on the aspects of Mill best practices, Estate best practices, workers welfare, stakeholder consultation, social, long-term economic viability.

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
- ☑ MSPO MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders

3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Certification Assessment there were three (3) Major & two (2) Minor nonconformities raised. The SOU 7 – Bukit Kerayong 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 Nonconformities has been verified for it effectiveness and closed accordingly.

Major Nonconformities:						
Ref	Area/Process Clause					
1871621-202001-M1	Palm Oil Mill	4.4.4.2 - Part 4				
Requirements:	The occupational safety and health plan should cover the following: b) The risk of all operations shall be assessed and documented. 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 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.					
Statement of Nonconformity:	 i. Risk assessment conducted not covering all operations and ii. Mitigation measures is not effectively implemented iii. Standard Operating Procedures for Chemical Handling is not effectively implemented 					
Objective Evidence:	 i. Sighted during site visit, the ramp operator who were found sitting on a high chair (same level considered as unsafe act. Noted during docum captured in the HIRARC register. ii. Sighted during site visit at the workshop, disecondary container without any label. This Occupational Safety and Health Manual, Management ver. 1, Issued no. 1 dated 20/8/2 for Handling, which stated 'iii. Ensure that the damaged and no spillage during handling.' 	as the hand rail) which is ent review, the activity was not esel and lubricant were stored in is against the SOP established in Chapter no. 9: Chemical Safety 2008 under section 6.0: Procedure				



Corrections:	Mill management has carry out HIRARC assessment for ramp lever operator on 5th February 2020
	To put labelling on temporary container use to store diesel and lubricant at the workshop
Root cause analysis:	HIRARC assessment for ramp level operator sitting on chair above the railing at FFB conveyor was not conducted as at time of HIRARC review as the team did not found any risk during the assessment of the activity at the ramp
	Workers are not well trained on the chemical handling SOP and OSH manual
Corrective Actions:	SQM will conduct refresher training on HIRARC procedure for operation personal and to ensure the HIRARC assessment covers all operation and its' activities.
	To conduct refresher training on chemical handling and OSH manual to all employee involve with chemical.
Assessment Conclusion:	Evidence verified:
	i. HIRARC for loading ramp has been reviewed on 3/3/2020 with additional activity for the ramp operator.
	ii. All chemical container has been labelledas per SOP and OSH Manual established
	The evidences submitted found adequate. Thus, the Major NC was effectively closed on 27/3/2020. The effectiveness of the implementation will be verified during next assessment.

Major Nonconformities:		
Ref	Area/Process	Clause
1871621-202001-M2	Palm Oil Mill	4.4.2.2 - Part 4
Requirements:	The system shall be able to resolve dispute in a manner, which is accepted by all parties.	n effective, timely and appropriate
Statement of Nonconformity:	No evidence complaint and grievances being appropriate manner and accepted by all parties.	
Objective Evidence:	Any repairs required by Internal Stakeholders need to fill-up the House Repair Requisition Form.	
	Sample taken on House No WQ-47; Mr Kumaren dated 25th June 2019 on leaking washing basin, damage of concrete drain and faulty lamp.	
	Faulty lamp being repaired by the Mill Charge-man. However, other repairs which incurred higher cost a quotation is required as the work will be outsourcing.	
	Sample taken on the quotation being obtained from contractor, Biglenz Tech Services on 4th November 2019 and work has been approved on 12th November 2019 through Doc No 4300487407. Seen, the invoice under No 0000030 being submitted on 18th November 2019.	
	No evidence, all the repairs being resolved in an effective, timely and appropriate manner, which is accepted by all parties as per Plantation Quality Management System, Level 2, Standard Operation Manual Sub –Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008 under Clause 6.3.	



Corrections:	To brief workers on current financial situation that will affect the effectiveness and timeline for housing repair. Management will propose any defect will resolve within 6 month.
Root cause analysis:	The Person In-charge is not aware of the time frame stipulated in the SOMM and
	lack of communication between the management and complainant
Corrective Actions:	To have a guideline on the complaint procedure to and communicate it to all employees
Assessment Conclusion:	Evidence verified:
	i. Briefing on safety, house repair, form filling, defects and completed jobs has been conducted on 12/2/2020
	ii. the mill has established new form for housing repair.
	The evidences submitted found adequate. Thus, the Major NC was effectively closed on 27/3/2020. The effectiveness of the implementation will be verified during next assessment.

Major Nonconformities:		
Ref	Area/Process Clause	
1871621-202001-M3	Palm Oil Mill	4.4.5.9 - Part 4
Requirements:	Wages and overtime payment documented on legal regulations and collective agreements.	the pay slips shall be in line with
Statement of Nonconformity:	The legal labour requirements is not fully demo	nstrated.
Objective Evidence:	In Bukit Kerayong POM, found that Latchumy (Employee ID: 00006767) and Kavitha (Employee ID: 000006776) has worked on night shift after 10 pm without having the Permit for Female Nightshift by Labour Department as below: a. Kavitha: 1. 2/08/2019: 1526-2301 2. 3/08/2019: 1513-2256 3. 8/08/2019: 1533-2300 4. 13/08/2019: 1502-2306 5. 16/08/2019: 1500-2300 6. 24/08/2019: 0804-2300 7. 30/08/2019: 0756-2306 8. 7/10/2019: 1509-2300 9. 9/10/2019: 1511—2300	
	10. 10/10/2019: 1510-2258 11. 21/10/2019: 1511-2306 12. 18/12/2019: 1458-2304 b. Latchumy: 1. 6/8/2019: 1453-2303 2. 7/8/2019: 1512-2308 3. 9/8/2019: 1506-2300 4. 17/8/201: 1454-2218 5. 19/8/2019: 1445-2259 6. 20/8/2019: 1450-2231 7. 21/8/2019: 1453-2256 8. 22/8/2019: 1452-2308	



Corrections:	10. 26/8/2019: 1454-2250 11. 2/10/2019: 1457-2230 12. 3/10/2019: 1457-2305 13. 5/10/2019: 1652-2300 14. 12/10/2019: 1803-2306 Mill management has apply permit on "Sekatan Kerja Malam Bagi Pekerja-Pekerja Wanita" from JTK on 19th February 2020 and until then Mill management will impose time limitation to received FFB from supplying estate which is not later than	
Doct cours analysis	9pm	
Root cause analysis:	Person in-charge is not well trained on the labour legal requirement	
Corrective Actions:	SQM with the assistance of Regional HR will organise a training on labour legal compliance for mill and estate personnel tentatively in March/April 2020	
Assessment Conclusion:	Evidence verified: i. The mill has submitted application for permit on "Sekatan Kerja Malam Bagi Pekerja-Pekerja Wanita" to JTK and waiting for approval as per 'Senarai Semak Dokumen Permohonan Sekatan Kerja Malam Bagi Pekerja-Pekerja Wanita' received by JTK dated 19/2/2020 ii. The mill has issued a memo to all sister estate on impose time limitation to received FFB from supplying estate which is not later than 9pm as per memo dated 27/1/2020 signed by the mill manager. The evidences submitted found adequate. Thus, theMajor NC was effectively closed on 27/3/2020. The effectiveness of the implementation will be verified during next	

Minor Nonconformities:		
Ref	Area/Process	Clause
1871621-202001-N1	Plantation	4.4.5.3 - Part 3
Requirements:	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.	
Statement of Nonconformity:	Non-compliance to Worker Contract Agreement on work on rest day.	
Objective Evidence:	Bukit Kerayong Estate No evidence, work on rest day being paid to the following worker based on the agreed Contract Agreements. Workers being paid normal rate instead of double. 1. BKE Employee Code - 0000155534	
Corrections:	Estate management has counter checked the data in the system with the AP schedule. The amount of salary underpaid has been verified and paid to the affected employees on 22nd January 2020.	
Root cause analysis:	Person in-charge is not well trained on the labour legal requirement	
Corrective Actions:	Training on payroll system and verification procedure to estate personal and person In-charge to ensure no hiccup in the data entry process	
Assessment Conclusion:	The CAP submitted were found satisfactory and adequate. As this is Minor NC, the effectiveness of the implementation will be verified during next assessment.	



Minor Nonconformities:			
Ref	Area/Process	Clause	
1871621-202001-N2	Plantations	4.4.4.2 - Part 3	
Requirements:	The occupational safety and health plan shall cover the following: 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.		
Statement of Nonconformity:	The First Aid Kit monitoring was not effectively in	mplemented	
Objective Evidence:	Bukit Kerayong Estate Noted during site visit and interview with spraying gang, it was found that the antiseptic liquid was placed in unlabeled bottle while at harvesting gang, there was no antiseptic liquid in the first aid box. Noted during document review, there was no evidence of first aid monitoring conducted.		
Corrections:	 Review First Aid Kit Training and replenish all the first aid box in the estate Appoint PIC (Tuan Abdul Aziz – Assistant Manager Bukit Kerayong Estate) To monitor first aid kit – Usage /Balances etc. 		
Root cause analysis:	A mechanism to monitor first aid kit is not being implemented since the resignation of BKE Medical Assistance.		
Corrective Actions:	 Create new monitoring record book and keep by PIC. Review and revised First Aid Kit Contents and distribute to each First Aid Kit Box To request assistance from sister estate's Medical Assistant (Bukit Cheraka Estate) to monitor the usage, first aid kit condition and also to train all the first aid kit representative from each workers gang. 		
Assessment Conclusion:	The CAP submitted were found satisfactory and effectiveness of the implementation will be verifi		

Opportunity For Improvement			
Ref	Area/Process	Clause	
1871621-202001-I1	Plantations	4.4.5.9 – Part 3	
Requirements:	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.		
Objective Evidence:	nce: Bukit Cherakah Estate Accuracy of check-roll data entry to be scrutinize before disseminating the pay-slip.		

Noteworthy Positive Comments		
1.	Good commitment from the management	
2.	2. Good relationship with all stakeholders	



3.3 Status of Nonconformities Previously Identified and OFI

Minor Nonconformities:			
Ref	Area/Process	Clause	
1732661-201901-N1	Plantations	4.1.3.1 - Part 3	
Requirements:	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		
Statement of Nonconformity:	Management review conducted was not adequate	te.	
Objective Evidence:	In the SOU 7 Minutes Meeting dated 11/01/2019, the overall implementation of the internal audit was not discussed. Although the outcome of the internal audit was discussed in the management review dated 20/12/2018, the management review did not cover the action plans required which will effect decision if any changes, improvement and modification required.		
Corrections:	To include in the next Management Review Meeting agenda of action plans on internal audit findings. To discuss in the next meeting on any action plans taken effected in any changes, improvement and modification required on operational.		
Root cause analysis:	The action plans were discussed separately by OU basis thus these action plans were not included during the Management review meeting at SOU level		
Corrective Actions:	To conduct awareness briefing to all Executive and ensure PIC responsible of MSPO certification notify in the requirement to discuss on the internal audit outcome.		
Assessment Conclusion:	Corrective action plan accepted. Effectiveness evidence to be verified during next surveillance assessment.		
ASA 2	The Management Review meeting is on Operating Unit basis. Bukit Kerayong Estate conducted the meeting on 24/12/19 and as for Bukit Cherakah Estate the meeting was conducted on 4th November 2019. Seen in the Minutes of Meeting, all the matters discussed were provided with action plans. The agendas discussed in the meeting are the following: a. Audit results and Status of preventive and corrective actions, b. Effectiveness of EQMS, c. Follow – up actions from previous management reviews, d. Review of Estate quality, environmental and OSH policies e. Report of quality team meeting f. EQMS document review Analysis of data and review of QSHE Objectives / Management Programme g. Other matters		
	The evidences sighted found adequate and ef minor NC was effectively closed.	ffectively implemented. Thus, the	

Minor Nonconformities:		
Ref	Area/Process	Clause
1732661-201901-N2	Plantations	4.2.1.1 - Part 3
Requirements:	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.	



Statement of Nonconformity:	Communication of information request was not adequate
Objective Evidence:	According to the clause 6.2 Procedure for External Communication, it is required that all communication sent out should be documented. At Bukit Cherekah Estate, several communication was not documented: 1. On 11/06/2018, there was a request to use the multipurpose hall. The communication back to the requested was not documented. 2. On 23/01/2018, there was a request for seeding from the Fire Department of Kuala Selangor. The request was rejected. However the rejection was not documented.
Corrections:	Immediately use documented medium to give feedback and action on any matter related to communication.
Root cause analysis:	The communication feedback was not recorded and documented.
Corrective Actions:	To inform and conduct refreshment briefing on communication related especially documented communication (written letters) Person In Charge En Muhammad Faez, Acting Senior Assistant of Bukit Cheraka Estate
Assessment Conclusion:	Corrective action plan accepted. Effectiveness evidence to be verified during next surveillance assessment.
ASA2	Seen, all the request & response form being implemented and exercise effectively. The SOP specifies the means to communicate and consult with the relevant stakeholders pertaining to the company's safety & health, social, environmental and other aspects. The SOP also specifies the timeframe to be taken to provide feedback to the stakeholder is 2 weeks from 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. Sample taken on 18th September 2019 request by Mr. SR Survey Consultant on survey of TNB Rentice Area. The application being response and approve on 20th September 2019 by the Manager. In Bukit Cherakah Estate, Principle of SMK Jeram have requested to use Estate area and Auxiliary Police for School Cross Country Event dated 9th, 15th and 17th January 2020. The application being made on 2nd January 2020 and the permission being granted on 4th January 2020. The evidences sighted found adequate and effectively implemented. Thus, the

Minor Nonconformities:			
Ref Area/Process Clause			
1732661-201901-N3	Plantations	4.2.2.3 - Part 3	
Requirements:	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.		



Statement of	Consultation and communication of stakeholders' approach related to meeting		
Nonconformity:	invitation was not effective.		
Objective Evidence:	During the stakeholder consultation, it was noted that relevant stakeholder has not attended the stakeholder consultation. As informed by the Assistant Manager, the invitation letter was sent by AP and as example, the letter was passed to the school security guard by the AP. In this case, it is not able to demonstrate that the invitation of stakeholders was directed to the intended person.		
Corrections:	To produce the acknowledgment of invitation letter received by the stakeholders		
Root cause analysis:	There is no mechanism to checking and ensure the approach of submission the invitation letter received to the stakeholder. Previously estate will conduct a phone call to confirmed the attendance (a week before the meeting) besides of submit the official letter to the stakeholder.		
Corrective Actions:	To assign person in charge on deliver the invitation letter. To brief the PIC on the requirement to ensure the invitation letter received and acknowledged by intended person. Person in Charge Pn Nur Nadiah Hani, Assistant Manager of Bukit Cheraka Estate		
Assessment Conclusion:			
ASA2	Evidence, the Estate have implemented new mechanism to invite the stakeholders for meeting as well as method of replying the invitation. Method of invitation as follows: - 1. Letter - Stakeholder require to fill-up the Attendance Confirmation Form. The response can be via hand or email. 2. By Hand - The stakeholder requires to acknowledge or sign in the list of invitation. 3. E-Mail - Stakeholder require to fill-up the Attendance Confirmation Form and response through email 4. Phone - This is the last option to re-confirm the external stakeholders' attendance status.		
	The evidences sighted found adequate and effectively implemented. Thus, the minor NC was effectively closed.		

Minor Nonconformities:				
Ref	Area/Process	Clause		
1732661-201901-N4	Plantations 4.4.5.6 - Part 3			
Requirements:	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.			
Statement of Nonconformity:	Employment contract for some workers was not available.			
Objective Evidence:	The employment contract for the following workers at Bukit Cherekah Estate was not available: 1. S.Nathathiram A/P S.Subramaniam 2. Sivaneswary D/O P.Muniady 3. Elilarasi Agilandan D/O Katansamy.			



Corrections:	Estate Management will check and identify the affected workers without their employment contract. The HR of the Central East Region will issue the verification letter.		
Root cause analysis:	Since the merging of 2 companies (Sime Darby & Guthrie), some documentation had been missing. Assuming 3 years of Collective Agreement produced and renewed (MAPA/NUPW), the workers are well understood on the terms and conditions.		
Corrective Actions:	To brief both check roll clerk on the workers employment contract requirement. To have a proper record and ensure all file related is available. Person In Charge Pn Suriza Radiman, Chief clerk of Bukit Cheraka Estate.		
Assessment Conclusion:	Corrective action plan accepted. Effectiveness evidence to be verified during next surveillance assessment.		
ASA2	Sighted, the Contract Agreement of the following workers is available and signed by both parties for previous year sample on the following workers: - 1. S.Nathathiram A/P S.Subramaniam – 740708-10-5160 2. Sivaneswary D/O P.Muniady – 750917-10-5780 3. Elilarasi Agilandan D/O Katansamy – 891224-10-5277 Other samples being taken to further verify at Bukit Kerayong Estate as stated below:- a. BKE Employee Code - 0000151196 b. BKE Employee Code - 0000132811 d. BKE Employee Code - 0000155534 e. BKE Employee Code - 0000154986 Bukit Cherakah Estate a. BCE Employee Code - 0000154985 b. BCE Employee Code - 0000058233 c. BCE Employee Code - 0000054302 d. BCE Employee Code - 0000087400 e. BCE Employee Code - 000003992 The evidences sighted found adequate and effectively implemented. Thus, the		
	minor NC was effectively closed.		

Minor Nonconformities:			
Ref	Area/Process	Clause	
1732661-201901-N5	Palm Oil Mill	4.1.3.1 - Part 4	
Requirements:	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		
Statement of Nonconformity:	Management review conducted was not adequate.		
Objective Evidence:	In the SOU 7 Minutes Meeting dated 11/01/2019, the overall implementation of the internal audit was not discussed. Although the outcome of the internal audit was discussed in the management review dated 20/12/2018, the management review		



did not cover the action plans required which will effect decision if any changes,			
improvement and modification required			
To include in the next Management Review Meeting agenda of action plans on internal audit findings.			
y changes,			
ction plans			
le of MSPO			
itcome.			
during next			
rayong Mill			
the matters			
discussed were provided with action plans. The agendas discussed in the meeting are the following:			
a. Audit results and Status of preventive and corrective actions,			
b. Effectiveness of EQMS,			
c. Follow – up actions from previous management reviews,			
d. Review of Estate quality, environmental and OSH policies			
e. Report of quality team meeting			
f. EQMS document review Analysis of data and review of QSHE Objectives /			
Management Programme			
g. Other matters			
g. Other matters			
The evidences sighted found adequate and effectively implemented. Thus, the			
minor NC was effectively closed.			
n li			

Minor Nonconformities:				
Ref	Area/Process	Clause		
1732661-201901-N6	Palm Oil Mill 4.6.4.2 - Part 4			
Requirements:	The management shall provide evidence of agree	ed contracts with the contractor.		
Statement of Nonconformity:	Some contracts was not available.			
Objective Evidence:	The addendum for contractor Kawalan Teknikal	Sdn Bhd is not available.		
Corrections:	Mill management will attached the addendum to the all contract or PO to the related contractor.			
Root cause analysis:	The mill was not maintain and kept the documents.			
Corrective Actions:	To modify the PO or (in house) contract with includes the special clause of the MSPO implementation. The relevant contractor will be provided the training regarding on the MSPO compliance.			
Assessment Conclusion:	Corrective action plan accepted. Effectiveness evidence to be verified during next surveillance assessment.			
ASA2	Seen, the addendum for contractor Kawalan Teknikal Sdn Bhd is available and signed by both parties on 25 th March 2019.			
	Evidence, all the contracts are available at mill. Sample taken on: - a. Lotus Two Enterprise b. Jasa Korporat Sdn Bhd			



The evidences sighted found adequate and effectively implemented. Thus, the minor NC was effectively closed.

Minor Nonconformities:			
Ref	Area/Process	Clause	
1732661-201901-N7	Palm Oil Mill	4.6.4.3 - Part 4	
Requirements:	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required		
Statement of Nonconformity:	Physical inspection not available to be verified		
Objective Evidence:	The addendum for contractor Kawalan Teknikal	Sdn Bhd is not available.	
Corrections:	Mill management will attached the addendum to the all contract or PO to the related contractor.		
Root cause analysis:	The mill was not maintain and kept the docume	nts.	
Corrective Actions:	To modify the PO or (in house) contract with includes the special clause of the MSPO implementation. The relevant contractor will be provided the training regarding on the MSPO compliance.		
Assessment Conclusion:	Corrective action plan accepted. Effectiveness evidence to be verified during next surveillance assessment.		
ASA2	Seen, the addendum for contractor Kawalan Teknikal Sdn Bhd is available and signed by both parties on 25th March 2019.		
	Evidence, all the contracts are available at mill. Sample taken on: - a. Lotus Two Enterprise b. Jasa Korporat Sdn Bhd		
	The evidences sighted found adequate and effectively implemented. Thus, the minor NC was effectively closed.		

Minor Nonconformities:			
Ref	Area/Process	Clause	
1732661-201901-N8	Palm Oil Mill	4.5.1.2 - Part 4	
Requirements:	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations		
Statement of Nonconformity:	Environmental management plan for aspect related to emergency condition such as EFB yard bund wall collapse was not adequate.		
Objective Evidence:	Pollution prevention plan/environmental management plan 2019 SOU (7) Bukit Kerayong Oil Mill		
Corrections:	Mill management already reviewed the environmental management plans immediately for emergency condition (EFB yard bund wall collapse). Mill management will ensure all elements in environmental management plans wisely reviewed in the future.		
Root cause analysis:	There is no monitoring on the environmental aspect.		
Corrective Actions:	The inspection and monitoring on the wall structure will be carry out and ready to deploy the emergency respond team is there is emergency situation.		



Assessment Conclusion:	Corrective action plan accepted. Effectiveness evidence to be verified during next		
	surveillance assessment.		
ASA2	Sighted at the EFB Yard, the EFB wall, sump pit has been constructed and pump has been installed. EFB leachate was pump into sludge pit and to effluent treatment plant.		
	The evidences sighted found adequate and effectively implemented. Thus, the minor NC was effectively closed.		

Minor Nonconformities:			
Ref	Area/Process	Clause	
1732661-201901-N9	Palm Oil Mill	4.4.4.2 - Part 4	
Requirements:	The occupational safety and health plan should cover the following: 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).		
Statement of Nonconformity:	Implementation of PPE usage as per plan was no	ot adequate.	
Objective Evidence:	It was sighted during visit at boiler where two operators who undertook the boiler fuel feeding job step were not wearing their face masks. This was not in-line with identification of fiber fuel dust inhaling hazard control measure.		
Corrections:	HIRARC been reviewed wisely and accordingly in line with the situation and condition.		
Root cause analysis:	There is no specific monitoring and risk assessment conducted to the boiler.		
Corrective Actions:	The HIRARC review team will review all the job step and identified if there any new activity or new machines in the mill operation.		
Assessment Conclusion:	Corrective action plan accepted. Effectiveness evidence to be verified during next surveillance assessment.		
ASA2	The mill provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008.		
	PPE issuance was recorded in PPE Issue logbook and store BIN Card. The records in the logbook was done by workers basis for monitoring purpose. Sighted the records for laboratory workers with employee no. 36036, 147291, 147878, 152452 154465. Laboratory works was provided with safety shoes, safety helmet, safety vest, Ear plug, nitrile gloves, half face respirator, and safety goggles.		
	The evidences sighted found adequate and effectively implemented. Thus, the minor NC was effectively closed.		



3.4 Issues Raised by Stakeholders

IS#	Description		
1	Issues: Bukit Kerayong Estate		
	a. The workers urged the Management to have a permanent Hospital Assistant in the Estate as the vacancy prolong for almost 9 months.		
	b. The local workers requesting from Management to go to Estate Panel Clinic instead of Government Clinic. The foreign workers do have an option to go to Panel or Government Clinic for treatment. The system should be standardized without prejudice to any nationality or races.		
	c. To provide a van for ending the patient to the Clinic rather than a motorcycle for safety reasons.		
	Management Responses:		
	a. The issue has been discussed in the Management Meeting to recruit new Hospital Assistant or Medical Assistant. For time being, the Hospital Assistant / Medical Assistant will be on loan or rotation basis from Cherakah Estate.		
	b. The Management will look into the issue highlighted and response to the request.		
	c. The Management will look into the matter.		
	Audit Team Findings:		
	No further issues.		
2	Feedbacks: Bukit Kerayong & Bukit Cherakah Estate		
	a. Good understanding about MSPO.		
	b. They are very happy with the management and hopes to extend their contract.		
	c. They have good understanding about complaint and grievance mechanism.		
	d. PPE given by company – free.		
	e. They claimed that the management provides good living quarters with proper domestic waste collection and promptly attend to quarters repairs.		
	f. No sexual harassment and violence case was happened in the workplace.		
	g. They were treated equally with no discrimination based on gender.		
	h. They confirmed wages are being paid more than the Minimum Wage of RM1, 100.00 per month and no issue on wages received as well as the deductions made.		
	Management Responses:		
	The Management will continue the good practices and cordial relationship with internal stakeholders.		
	Audit Team Findings:		
	No further issues.		
3	Feedbacks: Bukit Kerayong POM		



- a. They have good understanding about MSPO.
- b. They have good understanding about complaint and grievance mechanism.
- c. PPE given by company free.
- d. They reported that no sexual harassment and violence case was happened in the workplace.
- e. They were treated equally with no discrimination based on gender.
- f. They claimed that the management provides good living quarters with proper domestic waste collection and promptly attend to quarters repairs.
- g. They confirmed wages are being paid more than the Minimum Wage of RM1, 100.00 per month and no issue on wages received as well as the deductions made.

Management Responses:

The Management will continue the good practices and cordial relationship with internal stakeholders.

Audit Team Findings:

No further issues.

3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1732661-201901-N1	Minor	25/01/2019	Closed on 22/01/2020
1732661-201901-N2	Minor	25/01/2019	Closed on 22/01/2020
1732661-201901-N3	Minor	25/01/2019	Closed on 22/01/2020
1732661-201901-N4	Minor	25/01/2019	Closed on 22/01/2020
1732661-201901-N5	Minor	25/01/2019	Closed on 22/01/2020
1732661-201901-N6	Minor	25/01/2019	Closed on 22/01/2020
1732661-201901-N7	Minor	25/01/2019	Closed on 22/01/2020
1732661-201901-N8	Minor	25/01/2019	Closed on 22/01/2020
1732661-201901-N9	Minor	25/01/2019	Closed on 22/01/2020
1871621-202001-M1	Major	22/01/2020	Closed on 27/03/2020
1871621-202001-M2	Major	22/01/2020	Closed on 27/03/2020
1871621-202001-M3	Major	22/01/2020	Closed on 27/03/2020
1871621-202001-N1	Minor	22/01/2020	Open
1871621-202001-N1	Minor	22/01/2020	Open
1871621-202001-N1	Minor	22/01/2020	Open



3.6 Summary of the findings by Principles and Criteria

MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder

Criterio	n / Indicator	Assessment Findings	Compliance			
4.1 Principle 1: Management commitment & responsibility						
Criterion	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 commitments towards MSPO compliance being established through Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director dated 2 nd December 2019.	Complied			
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The sustainability goals are in line with United Nations Sustainable Development Goals (UNSDG) 2030, which committed to: - 1. Promoting good governance and transparency 2. Contributing to a better society 3. Minimising environmental harm 4. Delivering sustainability quality This policy being guided by the commitments spelt out in the Company's: -	Complied			



Criterio	n / Indicator	Assessment Findings	Compliance
Criterion	4.1.2 — Internal Audit	 Responsible Agriculture Charter (RAC) Human Rights Charter (HRC) Innovation and Productivity Charter (IPC) 	
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 Plantation, PSQM, Internal audit Procedure, Doc No; SD/SDP/PSQM/IAP, Revision 1, Date; 1/5/2015. The internal audit being conducted annually to implement and maintain the respective standard requirements effectively within the Group. The Management had drawn an Internal Audit Plan and it being carried out once a year to the Estate. The Internal audit conducted by SQM Malaysia & Central East RSQM.	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 -	The Internal Audit was planned to be conducted annually. The MSPO Internal Audit for Bukit Kerayong Estate was conducted on 24 th October 2019 and on 25 th October 2019 at Bukit Cheraka Estate by SQM Malaysia & Central East RSQM. The team Lead Auditor is Cik Eza Nurain Abdullah and assisted by Co-Auditor, Nor Atikah Mohd Hassan and Mohd Shuib bin Ishak.	Complied



Criterio	n / Indicator		Compliance			
			ised as follows: -			
			Bukit Kerayong Estate	Bukit Cheraka Estate		
		Major	2	2		
		Minor	1	2		
		OFI	2	2		
		All the findi Estate and mandatory				
4.1.2.3	Report shall be made available to the management for their review.	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit was responded by Estate Management within the acceptable timeframe.				Complied
	- Major compliance -					
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,	Sub-Section	1 5.6, dated: 25/5/2015)	ew, Standard Operation Man was established. The frequ carried out at least once a ye	ency	Complied



Criterion / Indicator	Assessment Findings	Compliance
improvement and modification. - Major compliance -	The Management Review meeting is on Operating Unit basis. Bukit Kerayong Estate conducted the meeting on 24/12/19 which was chaired by the Estate Manager. The meeting attended by 14 representatives.	
	As for Bukit Cheraka Estate the meeting was conducted on $4^{\rm th}$ November 2019. The agendas discussed in the meeting are the following:	
	a. Audit results and Status of preventive and corrective actions,	
	b. Effectiveness of EQMS,	
	c. Follow – up actions from previous management reviews,	
	d. Review of Estate quality, environmental and OSH policies	
	e. Report of quality team meeting	
	f. Food Safety issues	
	g. EQMS document review	
	h. Analysis of data and review of QSHE Objectives / Management Programme	
	i. Other matters	



Criterio	n / Indicator		Assessment Findings			Compliance
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.		mprovement Plan he plan as below:	Complied		
	- Major compliance -	No	Continuous Improvement Plan	Action	Completion Date	
		1	To reduce the usage of chemical	Implementation of Integrated Pest Management	On - going	
		2	Conserve soil moisture	EFB application at immature areas at 200 kg / palm Propagation of neprolephis in the field	On - going	
		3	Increase yield	EFB application POME application	On - going	



Criterion / Indicator		Assessment Findings			
	4	Environment	Zero Burning	On - going	
	In Buk	it Cheraka Estate, the	Continous Improveme	nt Plan as follows:	
	No	Continuous Imp	rovement Plan	Potential Saving	
	1	To reduce external newly mature field by		RM72,000	
	2	To reduce Overtime f	or field & office staff	RM 12,000	
	3	Stop using LF siever G-Bag.	by implementation	RM 9,000	
	4	Reduce backhoe rent years age backhoe	al cost by using >10	RM18,360	
	5	To reduce circle spra	aying labour cost by	RM 4,800	



		6			
			To stop utilization of NEST by paying child allowance	RM9,600	
	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 -	The Escrate r Sigma 1.	The management continuously reviewed the estates performance and work method for a continual improvement to achieve better results. The Estate indicates their commitment to continuously improve or crate new innovation to optimize field operation as evident in Lean Six Sigma Policy. The new techniques and improve practices as below: 1. MB Scissor Lift – reduce harvesting rate and labor usage. As for Bukit Cheraka Estate, the latest technology was on tree counting analysis conducted using UAV RGB Imagery in January 2019.		Complied
	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. - Major compliance -	20 th M	d, the training on MB Scissor Lift was conducted larch 2019 attended by Estate Assistant, St sing 7 personnel.		Complied
4.2 Princip	ole 2: Transparency				



Criterior	ı / Indicator	Assessment Findings	Compliance
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 -	Sime Darby has established Estate Quality Management System, Level 2, Standard Operation Manual Sub –Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008. The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Social Issues. The mechanism is to enable effective and timely communication with employees and external interested parties. The audit team observed that the above SOP specifies the means to communicate and consult with the relevant stakeholders pertaining to the company's safety & health, social, environmental and other aspects. The SOP also specifies the timeframe to be taken to provide feedback to the stakeholder is 2 weeks from 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. Sample taken on 18th September 2019 request by Mr. SR Survey Consultant on survey of TNB Rentice Area. The application being response with an approval dated 20th September 2019 by the Manager.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance			
		In Bukit Cheraka Estate, Principle of SMK Jeram have requested on 2 nd January 2020 to use Estate area and Auxiliary Police for School Cross Country Event dated 9 th , 15 th and 17 th January 2020. The permission being granted on 4 th January 2020.				
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 or social outcomes. - Major compliance -	Sime Darby Plantations Bhd website, http://www.simedarbyplantation.com/ have been a medium to disseminating public information ie; The Sustainability Report, Group Annual Report and Procedure for complaints and grievances. Information relating to land titles, safety and health plans, pollution prevention plan is available at the Estate.	Complied			
Criterion	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 -	Sime Darby has established Estate Quality Management System, Level 2, Standard Operation Manual Sub —Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008. The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Social Issues.	Complied			



Criterion / Indicator					Compliance		
			The mechanism is to enable effective and timely communication with employees and external interested parties.				
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	M re A A	he perso Juhamma esponsibles s for Bu ssistant ctober 2	Complied			
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.		takehold ategorize	Complied			
	- Major compliance -			Category	Bukit Kerayong Estate	Bukit Cheraka Estate	
					Total	Number	
			1	Vendor / Suppliers	5	18	
			2	Local communities	6	8	



Criterio	Criterion / Indicator		Assessment Findings				
		3	Other Interested Parties	3	-		
		4	Bank	1			
		5	Contractors		9		
		6	Goverment	23	21		
			TOTAL				
			keholders list updated in neraka Estate .	January 2020 at	Bukit Kerayong and		
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).	Traceab establish	Standard Operating Procedures for Sustainable Supply Chain & Traceability Appendix 15, Version 2 2018 issuance Feb 2018 was established and to ensure effective implementation on sustainable supply chain and traceability of FFB.				
	- Major compliance -	The Standard Operating Procedures also specifies the identified C of which the risk of mixing of certified and non-certified FFB is poss					



Criterion / Indicator		Assessment Findings	Compliance
		as well as the control of the flow and transportation of the FFB from the harvesting block to the weighbridge and subsequently to the POM.	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place through Central Reporting System (CRS). Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the FFB received.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The person in charge for transparency at Bukit Kerayong Estate is En Muhammad Zubair bin Rosslan, Assistant Manager as the persons responsible vide letter dated 11 TH March 2019 by Estate Manager. As for Bukit Cheraka Estate, En Muhammad Faez bin Sarif, Senior Assistant Manager as the persons responsible vide letter dated 15 TH October 2018 by Estate Manager	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	FFB being sell to Kerayong POM, own mill and being monitored by Marketing Department. Sighted the records of sales, delivery or transportation of FFB. This record being maintained and the documents are kept by the both site (estate and mill). The weigh bridge operator will check the system before releasing the dispatch.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance		
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 -	The Estate is operating in compliance with the applicable local, state, national and ratified international laws and regulations. The Company has established the Standard Operation Manual (SOM) Sub-Section 5.2 Customer Focus, Appendix 5.2.4 – Procedure for Legal and Other Requirements prepared by the Standards & Compliance Section, Total Quality and Environmental Management (TQEM) Plantation dated 01.11.2008. Sample of licenses or permit at Bukit Kerayong Estate 1. Permit Potongan Upah di bawah Seksyen 24 Akta Kerja 1955 – potongan gaji pekerja bagi pembayaran bil utility (bil air dan elektrik), Insuran Great Eastern dan Pinjaman Peribadi dated 11th March 2019 2. Permit Potongan Upah di bawah Seksyen 24 Akta Kerja 1955 bagi tujuan elektrik dated 6th Julai 2017 3. Permit Potongan Upah di bawah Seksyen 24 Akta Kerja 1955 bagi tujuan Kesatuan Sekerja Berdaftar dated 11th Feb 2019 4. Permit Potongan Upah di bawah Seksyen 24 Akta Kerja 1955 bagi tujuan Koperasi Pekerja Ladang dated 11th Feb 2019	Complied		



Criterion / Indicator	Assessment Findings	Compliance
	5. MPOB sell and transport FFB license: 525572002000 validity until 31 st Dec 2020, 3368.50 hectare	
	6. Air Compressor valid till 6 th February 2020, SL PMT 21473, 0.155 m3.	
	7. Permit for Scheduled Controlled Goods; S/N: B002722; Ref. # B.PGK.SEL/00533; Validity: 15/2/2020 – 14/12/2021; Diesel: 10,000 liter, Ladang Bukit Kerayong	
	8. Permit for Scheduled Controlled Goods; S/N: B002723; Ref. # B.PGK.SEL/00533; Validity: 15/2/2020 – 14/12/2021, Diesel: 3,000 liter; Ladang Sungai Kapar	
	9. Fire Extinguishers – 39 units will be expired on 15 th January 2021	
	As for Bukit Cheraka Estate:-	
	 Permit Potongan Upah di bawah Seksyen 24 Akta Kerja 1955 potongan gaji pekerja bagi pembayaran bil utility (bil air dan elektrik), Insuran Great Eastern dan Pinjaman Peribadi dated 5th March 2018 	
	2. MPOB sell and transport FFB license: 508324102000 validity 1 st March 2019 until 29 th Feb 2020, 2,028.29 hectare for Bukit Cloh Estate.	



Criterion / Indicator	Assessment Findings	Compliance
	3. MPOB sell and transport FFB license: 526188002000 validity 1 st February 2019 until 31 st January 2020, 1,604 hectare for Bukit Cheraka Estate.	
	4. MPOB license 589377011000; Ladang Bukit Cheraka; Seedling; Validity period 01/10/2019 - 31/09/2020; Lot 2969	
	5. Air Receiver valid till 28 th August 2020, SL PMT 34551, 0.24 m3.	
	6. Air Receiver valid till 28 th August 2020, SL PMT 34552, 0.24 m3.	
	7. Air Receiver Tank valid till 28 th August 2020, SL PMT 34554, 0.09 m3.	
	8. Lesen Abstraksi Sumber Air, SWAL : (P2) 001027, Titik pengambilan 1, Di tapak semaian anak sawit.	
	9. Lesen Abstraksi Sumber Air, SWAL : (P2) 001028, Titik pengambilan 2, Di tapak semaian anak sawit.	
	10. Lesen Abstraksi Sumber Air, SWAL : (P2) 001029, Titik pengambilan 3, Di tapak semaian anak sawit.	
	11. Lesen Abstraksi Sumber Air, SWAL : (P2) 001030, Titik pengambilan 4, Di tapak semaian anak sawit.	



Criterio	n / Indicator	Assessment Findings	Compliance
		 Lesen Abstraksi Sumber Air, SWAL: (P2) 001031, Titik pengambilan 5, Di tapak semaian anak sawit. Lesen Abstraksi Sumber Air, GWAL: (P1) 001004, Telaga 1, Ladang Bukit Cheraka Permit for Scheduled Controlled Goods; S/N: B000109SA; B.PGK.SEL/5300; Validity: 15/2/2019 – 14/2/2020 Diesel: 9,100 liter,Petrol 455 liter Petrol Permit for Scheduled Controlled Goods; S/N: B000108SA; 10,.PGK.SEL/5300 Validity: 15/2/2020 – 14/12/2021, Diesel: 3,000 liter; Fire Extinguishers – 39 units will be expired on 15th January 2021 	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	List of applicable legal and other requirements was made available during the assessment and complied in the Plantation Quality Management System Data. The Legal & Other Requirements Register (LORR) covers all the necessary regulatory requirements. The LORR was reviewed on 7/01/2020 by Mr. Mohd Muzafar Omar Basiron, the Bukit Kerayong Manager.	Complied



Criterio	Criterion / Indicator		Assessment Fin	dings	Compliance
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.	to ensure that a		he legal requirement register as changes and amendment illowing manner:	Complied
	- Major compliance -	i) Plantati) Plantation Sustainability and Quality Management Department		
		ii) Enquirin	i) Enquiring the laws books publisher		
		iii) Commu	iii) Communication with law/enforcement officers		
		iv) Website	iv) Website		
		The new revision	The new revision in 2020 at both Estates are as follows: -		
		Revision Date	Description	Section Affected	
		15 th Jan 2020	Minimum wages Order, Amendment 2019	Paragraph 3 & 4	
		15 th Jan 2020	Fire Services Act 1988 (Act 341) Amendment 2019	 New section 27A New section 61A Amendment section 33 	



Criterion / Indicator		Assessment Fin	dings	Compliance
			4. Amendment section 565. Amendment section 62	
	1 st March 2020	Occupational Safety And Health (Noise Exposure) Regulations 2019		
	1 st March 2020	Factories and Machinary (Noise Exposure) Regulations 1989 (Revoked)	Revoked on 1 st June 2019	
	31 st July 2020	Children and Young Persons (Amendment) Act 2010	operation on 1 st June	
	31 st July 2020	Land Acquisition Act (Amendment) 2016	Newly added	



Criterio	n / Indicator	Assessment Findings			Compliance
		21 st Jul 2020	Pesticides (Amendment of 1 st Schedule) Order 2019	Newly added	
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	The person in charge for Legal at Bukit Kerayong Estate is En Muhammad Zubair bin Rosslan, Assistant Manager as the persons responsible vide letter dated 11 TH March 2019 by Estate Manager As for Bukit Cheraka Estate, En Muhammad Faez bin Sarif, Senior Assistant Manager as the persons responsible vide letter dated 15 TH October 2018 by Estate Manager			Complied
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 -	Sime Darby did not acquire land from landowners, but leased it directly from the government. There were no issues of land disputes.			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.	Sime Darby did not acquire land from landowners, but leased it directly from the government. The quit rent payment was done accordingly as requirement from the state government.			Complied
	- Major compliance -	Bukit Kerayong I	Estate		



Criterion / Indicator		Assessment Fin	dings		Compliance
	The estate holds 2: follows:	The estate holds 21 land titles. Sighted the sampled land titles as follows:			
	Ownership No.	Lot No.	Hectare		
	24076	3639	33.4523		
	52712	2894	11.7106		
	52713	2896	424.0087		
	44850	98	39.5706		
	44392	3637	182.2094		
	Bukit Cheraka Estat	e			
	The estate holds 13 follows:	33 land titles. Sighte	d the sampled land t	itles as	
	Ownership No.	Lot No.	Hectare		
	27639	2875	67.9618		

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Criterio	n / Indicator	Assessment Findings			Compliance	
		288299	2538	52.6616		
		50097	2967	39.8362		
		50095	2965	100.3619		
		47691	4586	273.7694		
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Legal perimeter boundary markers was clearly demarcated and visibly maintained as sighted at both estates visited. Bukit Kerayong Estate The legal perimeter boundary was clearly demarcated with red color pole and security trenches. Sighted the boundary demarcation at field P14C adjacent with Eng Soon Estate. Bukit Cheraka Estate Legal perimeter was clearly demarcated with concrete pole, fences and security trenches. Sighted the boundary demarcation at P19A adjacent with SMK Jeram and SJK (T) Bukit Cheraka.				Complied
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	There were no issue	s of land disputes in	both Estate		Complied

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Criterio	n / Indicator	Assessment Findings	Compliance			
	be made available and that these should have been accepted with free prior informed consent (FPIC).					
	- 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.		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 were no issues of land disputes in both Estate	Complied			
	- Minor compliance -					
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.	There were no issues of land disputes in both Estate	Complied			
	- Major compliance -					
4.4 Princ	I.4 Principle 4: Social responsibility, health, safety and employment condition					



Criterio	Criterion / Indicator		Assessment Findings		
Criterion	4.4.1: Social Impact Assessment (SIA)				
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 -	Management Plan The Social Manag types/location, acti period. Sample taken at B FY2020 dated 2 nd J	ucted on 02 nd to 04 th Nover for FY2020 has been establement Plan indicates the ons, frequency, Person inukit Cheraka Estate, Social anuary 2020 as listed hereinanagement Plan – Bukit Cheraka To review social impacts and to implement plans to mitigate the negative impacts and promote the positive ones.	lished by both Estates. e objectives, category, charge and monitoring I Management Plan for n: - erakaFY2020 To ensure compliance to SOP and legal	Complied
			relevant stakeholders	communities / workers	
		Types / Location	Internal & External stakeholders	Management	



Criterio	n / Indicator		Compliance		
		Actions	Organize stakeholders', gender or union meeting	To contribute and document monetary / non-monetary aid to local communities	
		Frequency	At least once a year	At least once a year	
		Person in-charge	Executive	Management team	
		Monitoring Period	Throughout the year	Throughout the year	
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 Plantation Quality Management System, Level 2, Standard Operation Manual Sub –Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1 st Nov 2008.			Complied
		The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Social Issues.			



Criterio	n / Indicator	Assessment Findings	Compliance
		The mechanism is to enable effective and timely communication with employees and external interested parties. Under Group policies and authority's GPA No 85 Whistleblowing channels are established to help all stakeholders raise concerns, without fear or retaliation, on any wrongdoing that they may observe in the Sime Darby Group. The statement can be viewed through http://www.simedarbyplantation.com/	
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 -	The Standard Operation Manual under clause 6.3 Timeframe for External Communication has stated: -	Complied
		 Within 2 weeks of the date of receipt for communication requiring direct feedback and if the case is not solved, it will be cascaded to the further steps as per SOP. Within 1 week of the completion of the investigation for communication requiring investigation. 	
		Sample taken on complaint at Bukit Kerayong Estate by Mrs Veni on faulty of lamp at fertilizer store dated 13 th January 2020. As for Bukit Cheraka Estate, complaint being made by Saputra dated 9 th January 2020 on clogged up of septic tank at House No 6. Work being repaired on 17 th January 2020.	



Criterio	n / Indicator	Assessment Findings	Compliance
		Evidence, the action being taken and complete on 15 th January 2020 within timely and appropriate manner.	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.	Both Estate has established communication book for internal and external complaint. The communication log book is available at Estate office.	Complied
	- Minor compliance -	In case the complainant would want to make an anonymity complaint it can be made through electronic Complaint form or email to Senior Director or Whistleblowing committee or toll-free number or fax or by mail	
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Latest meeting with stakeholder was conducted in collaboration with Bukit Kerayong Estate, Bukit Cheraka Estate and Bukit Kerayong Mill. Stakeholder meeting was conducted on 4/12/2019 attended by 31 representatives. The meeting was chaired by En Syed Muzharel Azhar bin Syed Mohamad, Bukit Cheraka Estate Manager. There was no major issue raised during the meeting.	Complied
		All the workers are aware and able to explain on the complaint mechanism. The common complaints were on maintenance of quarters.	
		Seen, company's policy briefing being conducted on 8 th january 2020 to all 312 internal stakeholders at Bukit Cheraka Estate	
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon	In Bukit Kerayong Estate, sighted all internal and external complaints filled, responded and the records being maintained for the last 24	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	request Major compliance -	months. Seen, 6 complaints in 2019 and 1 in 2020 for external and 11 in 2019 and 3 in 2020 for internal.	
Criterion	4.4.3: Commitment to contribute to local sustainable development	t	
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	The Estate is committed and have contributed to local development. The contribution made to the internal and external stakeholders. In general, the CSR performed by the company consist of the following: 1. Contribution for the local communities programme 2. Contribution for the school programme 3. Support for the implementation of the programme such as blood donation and religious festival i.e. Hari Raya, Deepavali, Thaipusam.	Complied
Criterion	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 -	Sime Darby has established the Group Policy on Health and Safety signed by the Managing Director on Jan 2015. 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.	Complied



Criterion / Indicator	Assessment Findings	Compliance
	The GSQM team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.	
	Both estates visited has established Safety and Health Plan and reviewed on annually basis. The plan covers on OSH Legal Compliance, Emergency Response Plan, OSH Management System and Risk Management, HIRADC, training, OSH committee meeting, workplace inspection, medical surveillance and etc.	
	Sighted the implementation of the management plan FY 2019as follows:	
	Bukit Kerayong Estate	
	i. Medical surveillance for chemical handlers was conducted on annually basis. Latest surveillance was conducted in November 2019 by certified OHD with reg. no. JKKP/HQ/08/DOC/00/329. 10 workers were send for surveillance and found free from occupational related toxicity.	
	ii. Workplace inspection was conducted on quarterly basis before the Safety and Health committee meeting. The result has been discussed during the committee meeting. Sighted the discussion in meeting dated 19/7/2019 and 16/10/2019.	
	Bukit Cheraka Estate	



Criterio	n / Indicator	Assessment Findings	Compliance
		i. Medical surveillance for chemical handlers was conducted on annually basis. Latest surveillance was conducted in December 2019 by certified OHD with reg. no. JKKP/HQ/08/DOC/00/329. 36 workers were send for surveillance and 2 were found with evidence of occupational related toxicity. The workers were sent to work on other jobs not related to chemical handlings for at least 3 months as per letter from Medical Assistant dated 18/1/2020. ii. Workplace inspection was conducted prior to Safety and Health committee meeting. Sighted the inspection conducted on 7/1/2020, 4/10/2019, 2/7/2019 and 6/4/2019. The findings of the inspection was discussed during the Safety and Health committee meetings.	
4.4.4.2	The occupational safety and health plan shall cover the following:		Minor NC
	a) A safety and health policy, which is communicated and implemented.b) The risks of all operations shall be assessed and documented.	Sime Darby has established the Group Policy on Health and Safety signed by the Managing Director on Jan 2015. The policy has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the estate.	
	c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied	The estates visited has conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment,	

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Criterion / Indicator	Assessment Findings	Compliance
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). 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. 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. 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. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.	Latest HIRARC review was on 10/7/2019 with no changes was made since the last reviewed. Bukit Cheraka Estate Latest HIRARC review was conducted on 16/12/2019 due to accident occur at harvesting operations in 8/12/2019. The estate has established training program for employees exposed to chemicals used at the palm oil mill to ensure the continuous awareness to the employee. The training was conducted by the Manager, Asst. Manager and representative form the chemical suppliers to the supervisors and operators. Sighted the sampled training records as follows: Bukit Kerayong Estate i. Sprayers and chemical handling training dated 18/7/2019 ii. Pest and disease training dated 20/12/2019 iii. Manuring SOP training dated 7/5/2019, 13/6/2019 and 9/7/2019	



Criterion / Indicator	Assessment Findings	Compliance
i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents	ii. Safety work procedure during spraying training dated 5/12/2019	
should be available at each worksite.	iii. Spraying and safety briefing dated 30/10/2019	
j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.	iv.Spraying techniques and safety aspects and maintenance of Inter Sprayer dated 13/9/2019	
- Major compliance -	The estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008.	
	Bukit Kerayong Estate	
	PPE issuance records was recorded in PPE record book base on type of PPE. Sighted the PPE records for nitrile gloves, mask, and Apron and rubber boots. Noted during the interview with general workers, they were provided with appropriate PPE when conducting Pest and Disease spraying such as rubber boots, mask, apron, nitrile gloves and safety goggles.	
	Bukit Cheraka Estate	
	PPE issuance was recorded in PPE Replacement Record form. The records was done on workers basis. Sighted the records for workers with employee no. 102320, 101415, 126713, 126723 and 139796.	
	Procedures of chemical handling is presented in several documents, such Document No. SD/SDP/SQM (ESH)/001-1Sime Darby Plantation	



Criterion / Indicator	Assessment Findings	Compliance
	Environment, Safety, and Health Management System (ESHMS) Manual dated July 1st, 2012.	
	The Estate Manager has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter dated 1/1/2020 signed by the Regional CEO. Estate management has appointed Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the OSH achievement, accident and incident report, OSHA compliance, PPE issue, first aid kit monitoring, PPE monitoring, workplace inspection, firefighting equipment monitoring and training. Sighted the minutes meeting records as follows:	
	Bukit Kerayong Estate	
	i. 16/1/2019	
	ii. 25/4/2019	
	iii. 19/7/2019	
	iv. 16/10/2019	
	Bukit Cheraka Estate	



Criterion / Indicator	Assessment Findings	Compliance
	i. 10/4/2019	
	ii. 15/7/2019	
	iii. 9/10/2019	
	iv. 10/1/2020	
	The OHS Chairman and Secretary are in coordination with RSQM Head Quarter Officer for any update national regulations and collective agreements.	
	Accident of emergency procedure is presented in Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3.	
	Noted during interview with workers show the satisfactory understanding on the emergency procedure established. Training was conducted as follows:	
	Bukit Kerayong Estate	
	i. First aid kit and ERP training dated 19/11/2019	
	ii. Fire drill training dated 3/5/2019	
	Bukit Cheraka Estate	

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Criterion / Indicator	Assessment Findings	Compliance
	i. Fire drill training dated 3/5/2019	
	ii. ERP and Spillage training dated 19/12/2019	
	First aider present at various work station at the estates visited. The mandore was appointed as responsible for first aid box at each workstation.	
	Bukit Kerayong Estate	
	Noted during site visit and interview with spraying gang, it was found that the antiseptic liquid was placed in unlabeled bottle while at harvesting gang, there was no antiseptic liquid in the first aid box. Noted during document review, there was no evidence of first aid monitoring conducted.	
	Bukit Cheraka Estate	
	The estate appointed the mandore as a first aider and was given training by competent first aider such as Asst. Manager and Medical Assistant. Latest training was conducted on 17/10/2019.	
	The estates maintain the records of accident cases and documented in the "Laporan dan Siasatan Kemalangan" log and reported to HQ using the PSQM-ESH Monthly update form. The accident occurred was reviewed on quarterly basis during OSH committee meeting.	



Criterio	n / Indicator	Assessment Findings	Compliance
		Both estates visited submit the JKKP 8 form on annually basis to DOSH through MyKKP website.	
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 communicated to the employees. - Major compliance -	Statement signed by Mohamad Helmy Othman Basha; Group	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		6. Respecting community rights and the rights of indigenous people 7. Protecting the Rights of vulnerable people 8. Protecting the rights of children 9. Eliminating violence and sexual harassment ii. Responsible Agriculture Charter – Human Rights and Social Development Commitments Clause 2.1, Respect Human Rights & empower communities and Clause 2.2 Protect Labor standards and enhance employment conditions. iii. Sime Darby Plantation Group, Vendor COBC dated 30 th May 2018 under Clause 5, Labor and Human Rights. Communication of all the policies to workforce is through training and during muster call. Seen, the communication to External Stakeholders through the Stakeholder Meeting.	
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 established Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha; Group Managing Director dated 2nd December 2019. Human rights element on discriminatory practices and equal opportunity being spelt out under the followings: -	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
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 -	1. Human Rights Charter 2. Responsible Agriculture Charter 3. Responsible Agriculture Charter No evidence of discrimination based on race, skin color, religion, gender, national origin, ancestry, disability, marital status, and sexual orientation was found in both Estates. During interviews with internal and external stakeholders, it is clearly stated no discrimination at Estate Pay and conditions are documented in the workers' Contract Agreement and wage payment records / pay slip. The salary is according to 'Guidelines on the Implementation on the Minimum Wages'. National Wages Consultative Council Act 2018 (Act 732) Malaysian minimum salary is RM1100.00 as stated in the guidelines. Rate of pay is based on MAPA / NUPW Agreement Salary Scale as seen	Compliance Minor NC
		in the Contract Agreement and pay-slip. All the workers are under Estate pay-roll system. Sample taken on the workers below: -	
		Bukit Kerayong Estate f. Bukit Kerayong Estate Employee Code - 0000151196	

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Criterion / Indicator	Assessment Findings	Compliance
	g. Bukit Kerayong Estate Employee Code - 0000043744	
	h. Bukit Kerayong Estate Employee Code - 0000132811	
	i. Bukit Kerayong Estate Employee Code - 0000155534	
	j. Bukit Kerayong Estate Employee Code - 0000154986	
	Bukit Cheraka Estate	
	k. Bukit Cheraka Estate Employee Code - 0000144985	
	I. Bukit Cheraka Estate Employee Code - 0000058233	
	m. Bukit Cheraka Estate Employee Code - 0000054302	
	n. Bukit Cheraka Estate Employee Code - 0000087400	
	o. Bukit Cheraka Estate Employee Code – 0000003992	
	Minor Non-Conformity	
	No evidence, work on rest day being paid to the following worker based on the agreed Contract Agreements. Workers being paid normal rate instead of double. Sample taken on BKE Employee Code - 0000155534	



Criterio	n / Indicator		Asses	sment Findings		Compliance
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.	Sime [August	Darby Plantation Sdn	ent between KSG Enter Bhd, Bukit Kerayong l tion of FFB in Peninsu lary 2020.	Estate dated 30 th	Complied
	- Minor compliance -	Seen, namely		etween KSG Enterprise	and his workers,	
		1.	Mr. Ravindran a/l Sup	opaih – 741004-10-542	3	
		2.	Mr. Sri Devan a/l Sub	oramanyan – 751013-10)-5547	
		3.	Mr. Murugan a/l Vasu	u – 830209-10-6053		
			d the pay slip, EPF, SO workers	CSO and SIP and conti	ract agreement of	
		Constru Cherak works	uction Sdn Bhd and a Estate dated 1 st July	n the Contract Agreem Sime Darby Plantation y 2019 on Land prepar ng 2019A. The contrac	Sdn Bhd, Bukit ation and related	
			Contract Agreement be s, namely: -	etween YIH Construction	n Sdn Bhd and his	
		NO	Name	IC NO	EPF NO	



Criterior	n / Indicator		Asses	sment Findings		Compliance
		1	Juperi Latif	681014-10-5193	11594874	
		2	Saw Kheng Han	900512-10-6137	18153847	
		3	Hamizan Mustapa	760421-06-5497	14006133	
		4	Ee Tian Yew	790214-10-5529	20906306	
		on Aug		P being contribute to all 2019 pay-slip. Contrac he file.		
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 -	Sighted the wo Person	a of their workers. d at Bukit Kerayong Es orkers in The Employe al Info, Statutory, Banl	mployee Master Details state the Personal Parti e Master Listing. The k Info, Gang Info and L contract is also found y the company	iculars data for all report stated the TIP Components.	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			I the offered position es, rest day, working or		Complied



Criterion / Indicator	Assessment Findings	Compliance
indicated in the employment records. - Major compliance -	Sighted, Employment Contract between the Estate and the workers. The Agreement stated all the term and conditions according to Malaysian Law. The contract is in Bahasa Malaysia, Indian and Bangladeshi. This contract is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of local, Indian, Bangladesh, Nepal and Indonesian. Sample taken on the following workers: -	
	a. Bukit Kerayong Estate Employee Code - 0000151196 b. Bukit Kerayong Estate Employee Code - 0000043744 c. Bukit Kerayong Estate Employee Code - 0000132811 d. Bukit Kerayong Estate Employee Code - 0000155534 e. Bukit Kerayong Estate Employee Code - 0000154986 Bukit Cheraka Estate f. Bukit Cheraka Estate Employee Code - 0000144985	



Criterio	n / Indicator	Assessment Findings	Compliance
		 g. Bukit Cheraka Estate Employee Code - 0000058233 h. Bukit Cheraka Estate Employee Code - 0000054302 i. Bukit Cheraka Estate Employee Code - 0000087400 j. Bukit Cheraka Estate Employee Code - 0000003992 	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. - Major compliance -	Working hours is 8 hours. From Monday to Saturday. The overtime maximum is 104 hours according to Malaysian Law. Seen the working hours being displayed at the notice board. Estate has used pocket check roll as a working time recording system.	Complied
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations 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 -	The working hour and break time have been clearly stated in the Employment Contract. Sighted in the Contract Agreement the rate of overtime which agreed by both parties. There is no complaint received regarding payment or are forced to work overtime during site interview.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker. Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made.	Complied



Criterion	/ Indicator	Assessment Findings	Compliance
	- Major compliance -	Documented payslip was distributed to individual workers on the day of payment. Opportunity for Improvement Bukit Cheraka Estate. Accuracy of check-roll data entry to be scrutinize	
		before disseminating the pay-slip.	
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. - Minor compliance -	All foreign workers have been provided with SOCSO and with regards to local workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations	Complied
	- Fillior 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. - Major compliance -	The Bukit Cherakaand Bukit Kerayong Estate line site was inspected during the assessment. The condition of the housing facilities is deemed appropriate. Each house is shared by 6 workers (for single workers). Water and electricity is subsidized by the company. The line site is found cleaned. Rubbish are collected periodically and each house are provided with rubbish bin. At the line site multipurpose hall, surau, clinic and small sundry shop is available.	Complied
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.		Complied



Criterion	/ Indicator	Assessment Findings	Compliance
	- Major compliance -	Human rights element on sexual harassment and violence at the workplace being spelt out under the followings: - 1. Human Rights Charter 2. Responsible Agriculture Charter 3. Responsible Agriculture Charter No harassment & violence and assessment for new mothers (infants under 24 months) was reported in 2019. The audit team had confirmed	
		during interview with workers. Last meeting at Bukit Kerayong Estate was conducted on 16 th November 2019 lead by Pn. R. Saraswathy with 16 members. In Bukit Cheraka Estate, the last meeting was on 16 th January 2020 chaired by Puan Suriza Radiman. The meeting attended by 15 personnel.	
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.	Sime Darby has established Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha; Group Managing Director dated 2nd December 2019. Human rights element on 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 being spelt out under the followings: - 1. Human Rights Charter	Complied

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Criterion	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	Responsible Agriculture Charter Responsible Agriculture Charter Local or foreign workers are given the freedom which it is an optional for them to join worker union formed at Estate. Thus, their freedom are not restrict by Estate Management.	
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 programmes. Children shall not exposed to hazardous working conditions. - Major compliance -	Sime Darby has established Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha; Group Managing Director dated 2nd December 2019. Human rights element on Children and young persons shall not be employed or exploited being spelt out under the followings: - 1. Human Rights Charter 2. Responsible Agriculture Charter 3. Responsible Agriculture Charter There are no children below ages of 18 working in the estate and this was proven through checking the list of employees as well as their biodata and through estate visits.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.6.1	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 -	The estate visited has established training plan base on the training	Compliance
		Bukit Cheraka Estate i. Pest and Disease refresher training dated 16/8/2020 ii. Oil Palm nursery culling training dated 16/7//2019	



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training	 iii. Fire drill training dated 3/5/2019 iv.Spraying techniques and safety aspects and maintenance of Inter Sprayer dated 12/3/2019 v. LCC Inoculation training dated 18/1/2020 vi. Safety and crop quality training for workers training dated 13/1/2020 The estates visited has conducted training need analysis for all employee, management and contractors. The need analysis was 	Complied
	programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	conducted base on the job designation and training required by the job type. Bukit Kerayong Estate 33 training was identified for management, employee and contractors and programmed throughout FY 2020. Bukit Cheraka Estate 18 training was identified for management, employee and contractors and programmed throughout FY 2020.	



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.6.3	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. - Minor compliance -	The estates visited has training program which updated annually. The annual internal audit by GSQM and management review does review the effectiveness of the training plan and its execution.	Complied
4.5 Princ	ciple 5: Environment, natural resources, biodiversity and ec	cosystem 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 -	Sime Darby has established Environmental Policy signed by the Managing Director on January 2015. The policy has been communicated to the workers through briefing, training and displayed on signboard.	Complied
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 estates visited has established environmental management plan base on aspect and impacts analysis conducted. The environmental management plan was established base on Environmental Aspect Impact Identification and Environmental Impact Evaluation conducted and documented in Pollution Prevention Plan. The EAI/EIE was reviewed by the estate management team.	Complied
		The management plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated Environmental	

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Criterio	n / Indicator	Assessment Findings	Compliance
		Issue, Mitigation Measures and Person Responsible. The EAI/EIE and management plan was reviewed on annually basis during Management Review Meeting. Latest review was conducted on 5/1/2020.	
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.	The estate has established Environmental Management Plan FY 2019. The plan was reviewed on annually basis. Sighted the implementation of the management plan as follows:	Complied
	- Major compliance -	Bukit Kerayong Estate	
		i. Sighted at the chemical mixing area, the waste water were collected in the collection sump. The collected waste water were reused to chemical premix.	
		ii. Vehicle monitoring was conducted on daily basis and recorded in Vehicle Service logbook. Sighted the monitoring records for tractor TF015, TF022 and TF023.	
		Bukit Cheraka Estate	
		i. Sighted at the chemical mixing area, the waste water from the chemical premixing activities were collected in the collection sump and reused for chemical premix.	
		ii. Rain water harvesting tank were placed at the office and workshop. The water were used for general cleaning, operation and gardening.	



Criterio	n / Indicator	Assessment Findings	Compliance
		iii. Vehicle preventive maintenance monitoring was conducted on daily basis and recorded in Service logbook. Sighted the monitoring records for TC004 and TM034 dated 16-22/12/2019.	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Program to promote positive impact was documented in Environmental Management Plan. Program to promote positive impact was documented in Environmental Management Plan. The management plan also include a program to promote positive impact as follows: Bukit Kerayong Estate i. Maintaining bufferzone ii. To plant LCC to cover open space area iii. To build terrace at slop area Bukit Cheraka Estate i. Rain water harvesting	Complied
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	The estate visited continue provided training to ensure the awareness regarding the environmental policy among the employee. The estates management has established annual training program which covers	Complied



Criterio	n / Indicator		Assessment Findi	ngs	Compliance	
	objectives.			nce related trainings to the		
	- Major compliance -	executives, staffs and	executives, staffs and workers.			
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	The estate visited has discussed on environmental issue during ESH Committee meeting where representative of the management and employee raised their concerns about environmental quality in the estates.			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 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	ends monthly to head office through SAP system. The monitoring of no renewable energy usage was conducted on monthly basis. Sighted the records as follows:		m. The monitoring of non-	Complied	
	operations over the base period.	Month	Consumption/FFB			
		Jan 19	1.78	_		
	- Major compliance -	Feb 19	1.67	4		
		Mar 19	1.33	-		
		Apr 19 May 19	1.52 1.73	-		
		Jun 19	1.61	-		
		Jul 19	0.72	1		
		Aug 19	1.29	1		
		Sep 19	1.48]		
		Oct 19	2.03]		

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Criterion	n / Indicator		Assessment Findings	Compliance		
		Nov 19 Dec 19	1.69 2.41			
		The estate has esta usage of diesel and established. Sighted follows:	n			
		Bukit Kerayong Estate	Bukit Kerayong Estate			
			was conducted on daily basis and recorded bok. Sighted the monitoring records for tract 023.			
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.	The estimate for the operations, including efficiency of their or including all transport respective estate year	gy s,			
	- Major compliance -					
4.5.2.3	The use of renewable energy should be applied where possible.	No opportunities of re	enewable energy usage in the estate visited.	Complied		
	- Minor compliance -					
Criterion	4.5.3: Waste management and disposal	<u> </u>				



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The estates visited has identified the waste products and source pollution and documented in Waste Management Plan FY 2020. The plan was reviewed on annually basis. Latest review was done in 11/1/2020 for Bukit Kerayong Estate and 2/1/2020 for Bukit Cheraka Estate. The waste has been identified as follows: i. Workshop – SW 305: used lubricants, SW 306: used lubricant oil, SW 102: Lead acid batteries, SW 312: Residue from workshop ii. Clinic: SW 404: pathogenic waste, clinical waste, used surgical blades, used syringes iii. Main division store: SW 408: contaminated soil, from cleaning spill kit, disposed containers, SW 409 empty pesticides container, SW 410: Used filter, gloves and rags, SW 425: waste from the production, formulation, trade or use of pesticides, herbicides or biocides iv. other waste: rubbish	Complied
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 		Complied



Criterion / Indicator	Assessment Findings	Compliance
them into value-added by-products - Major compliance -	i. Domestic waste was collected once a week by contractors appointed by the Majlis Perbandaran Klang and disposed at the municipal landfill. Sighted the domestic collection records in Domestic Waste Record Book.	
	ii. Empty fertilizer bag was disposed through appointed contractors. Sighted the invoice records no 1430 dated 8/8/19 and 1429 dated 14/8/2019	
	iii. Sighted the records of Sime Darby Industries Sdn. Bhd. conducted the vehicle/machineries maintenance service and collected the used oil and filter as per permission letter dated 3/12/2019 and 19/9/2019	
	iv. Monitoring empty pesticides container and empty fertiliser bags was recorded in Chemical Empty Bottle Record Book and Fertiliser Empty Bags Record book. Sighted the inventory and disposal records FY 2019.	
	Bukit Kerayong Estate	
	Latest review was conducted on 11/1/2020. Sighted the implementation of the management plan as follows:	
	i. Empty pesticides container were identified as recycle waste. All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors, SS Setia Technology Enterprise.	



Criterio	n / Indicator	Assessment Findings	Compliance
		ii. Domestic waste was collected by appointed contractor by MDKS. The collection was done three times a week. The records of collection were recorded in 'Buku Laporan Pelawat' by the security.	
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. - Major compliance -	Procedure for Scheduled Waste Management was established (SD/SDP/PSQM (ESH)/203-EN1 dated 26/2/2016. Proper disposal of waste material are carried out as per the company procedures. The procedures are fully understood by workers and managers. Both estate visited also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estate visited. Empty pesticides container were identified as recycle waste. All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors, SS Setia Technology Enterprise. Refer approval letter from DOE no AS (B)J 91/110/619/069 Jld 3(37) dated 24/10/2018. Sighted the implementation of the triple rinse during site visit at the storage area. For scheduled waste generated by the workshop such as SW 305, SW 306 and SW 410, the appointed contractors, Sime Darby Industries Sdn. Bhd. will collect and disposed the scheduled waste as per approval letter from DOE with ref. no. AS (BB) 91/110/619/161 Jilid 14(69) dated 6/9/2011.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
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 national programme on recycling of used HDPE pesticide containers. - Major compliance -	Empty pesticides container were identified as recycle waste. All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors, SS Setia Technology Enterprise. Refer approval letter from DOE no AS (B) J 91/110/619/069 Jld 3(37) dated 24/10/2018. Sighted the implementation of the triple rinse during site visit at the storage area. Latest empty containers disposal as follows: Bukit Kerayong Estate i. Invoice no 1253 dated 29/12/2018 ii. Invoice no 1529 dated 14/11/2019 Bukit Cheraka Estate i. Invoice no 1538 dated 28/11/2019 iii. Invoice no 1461 dated 12/9/2019 iii. Invoice no 1339 dated 10/4/2019	Complied
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	Domestic waste was collected once a week by contractors appointed by the Majlis Perbandaran Klang and Majlis Daerah Kuala Selangor and disposed at the municipal landfill. Sighted the domestic collection records in Domestic Waste Record Book.	Complied



Criterio	n / Indicator		Assessment Findi	ngs	Compliance
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. - Major compliance -			ssessment of all polluting entification, Environmental	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	documented in Env Pollution Prevention implementation of the	vironmental Manager Plan and Energy Man e management plan a diesel usage was co	ignificant impact has been nent Plan under section agement Plan. Sighted the s follows: nducted on monthly basis.	Complied
		Month Jan 19 Feb 19 Mar 19 Apr 19 May 19 Jun 19 Jul 19 Aug 19	Bukit Kerayong Estate Consumption/FFB 1.78 1.67 1.33 1.52 1.73 1.61 0.72 1.29	Bukit Cheraka Estate Consumption/FFB 1.89 1.98 2.06 1.78 2.44 2.29 1.17 2.26	

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Criterio	Criterion / Indicator		Assessment Findings		Compliance
		Sep 19	1.48	1.45	
		Oct 19	2.03	2.17	
		Nov 19	1.69	3.09	
		Dec 19	2.41	3.98	
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 include:	15/1/2015 signed by	the Managing Direct	ver Protection Policy dated tor stated that buffer zone er banks.	
		River width	Buffer zone		
	a. Assessment of water usage and sources of supply.	> 40 meters	50 meters		
		20 to 40 meters	40 meters		
	b. Monitoring of outgoing water which may have negative		20 meters		
	impacts into the natural waterways at a frequency that	5 to 10 meters	10 meters		
	reflects the estate's current activities.	< 5 meters	5 meters		
		*> 3 meters	20 meters		
ſ	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.).	Monitoring based or Appendix 7 Standard	d Operation Procedu	tion Management System re (SOP) for taking water ar 2008, issue no. 1, dated	
	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.	management plan. T	he management plan	d documented the water focus on monitoring water ge, monitor usage of fresh	



Criterion / Indicator		Assessment Findi	ngs	Compliance
e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. - Major compliance -	management plan as Bukit Kerayong Estate i. The estate condu Sighted the water sar Pesticides water analy Report no.: PL943/20 Sample date: 21/10/2 Report date: 7/11/20 Results: Non - Detect	follows: e acted river water san mpling records as follows: ysis Sg. Sembilang 2019 2019 ted ad monitor the water	usage on monthly basis Bukit Cheraka Estate Consumption/FFB 1.21 1.29 1.88 1.09 1.42	

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Criterio	Criterion / Indicator		Assessment Findings		
			2.42 1.24 1.43 2.36 2.15 2.53 2.76 has placed containe water harvested wa	0.85 2.19 1.36 1.43 2.23 3.10 2.72 r for rain water harvesting at the s used for washing.	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	Bukit Kerayong No construction Tambak Jawa.		. Sembilang, Sg. Janggut and Sg.	Complied
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). - Minor compliance -		_	vater from road-side drains being road side pits was observed in both	Complied



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 Selangor Central Zone: Strategic Operating Unit (SOU) 7 Bukit Kerayong has been conducted on 19 – 22/5/2015 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final Report (Version 2.0). 2 HCV under HCV 4 category has been identified in SOU 7 as follows: i. Bukit Kerayong Esate; Pond 3.0 ha ii. Bukit Cheraka Estate; Slope area 55.52 ha	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. 	No RTE species were identified in the assessment conducted as per HCV Re-Assessment for Selangor Central Zone: Strategic Operating Unit (SOU) 7 Bukit Kerayong Final Report (Version II) dated December 2015. The estate has established HCV/Biodiversity Management Plan base on the HCV identified in the report.	Complied



Criterion / Indicator	Assessment Findings	Compliance
- Major compliance -		
A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	The estate has established HCV/Biodiversity Management Plan base on the HCV identified in the report. Sighted the implementation of the management plan as follows: Bukit Kerayong Estate i. The estate has erected signage on prohibition of swimming, hunting and fishing at the pond area. ii. Monitoring of HCV area was conducted on monthly basis. Sighted the monitoring records dated 23/10/2019, 27/11/2019, 27/12/2019, 16/1/2010. No issue were recorded in the report. Bukit Cheraka Estate i. HCV monitoring was conducted at minimum once a month and recorded Monitoring of HCV and Non-HCV Areas form. The monitoring focusing on encroachment, wildlife issue and pollution and erosion. Sighted the monitoring records dated 7/1/2020, 20/12/2019, 30/10/2019 and 5/9/2019. No issue were recorded in the report.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance	
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law –EQA and Regulations 1974.	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. - Major compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied	
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. - Major compliance -	No controlled burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied	
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	Noted based on the records on the land clearing and felling for the replanting at visited estates, method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction as sighted during site visit at P19A in Bukit Cheraka Estate.	Complied	
4.6 Princ	4.6 Principle 6: Best Practices			



Criterio	n / Indicator	Assessment Findings	Compliance
Criterion	4.6.1: Site Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	SOP was established for the Estates. Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU7 as a guidance document to conduct estate operation. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc. Sime Darby has established mechanism to monitor the implementation of their procedure by Plantation Advisor Visit, Performance Monitoring Visit and Agronomist Visit. The visit focusing on Yield Improvement, Crop Recovery, Replanting and Immature Palms Maintenance and Mature Upkeep.	Complied
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 -	Sime Darby has established policy on slope protection and documented in Slope and River Protection Policy signed by the Managing Director in Jan 2015. The policy stated for slope more than 25 degree must be exclude from any new plantation development and replanting program. All the existing crop and vegetation shall be maintain accordingly. Landscapes of both estates visited are mostly flat. Sime Darby has established policy on slope protection and documented in Slope and River Protection Policy signed by the Managing Director in Jan 2015. The policy stated for slope more than 25 degree must be exclude from	Complied

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Criterio	n / Indicator	Assessment Findings Compliance
		any new plantation development and replanting program. All the existing crop and vegetation shall be maintain accordingly. The policy was communicated to the employee during master briefing, townhall training and displayed in several notice board in the estate.
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Both Estates visited had a visual identification/reference system for each established field/block and maps established. Field numbers and hectare were marked on palms and in some areas on concrete slaps.
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 -	SOU 7 has continued its commitment to long term sustainability and improvements through a capital expenditure program. The management has forecasted 5 years business plan from FY 2019 – 2024.
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.	SOU 7 have long range replanting programme until FY 2024. Replanting planned for the palm older than 25 years, non-performance field (yield) and ganoderma infected palm. Observed the replanting programme for the next financial year as follows:
	- Major compliance -	Years Bukit Bukit Cheraka Kerayong Estate (Ha) Estate (Ha)

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Criterio	n / Indicator		Assessi	ment Findings		Compliance
4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast	2020 2021 2022 2023 2024 All relevant infosighted in annuali. Total crop prolii. Activity direct	0.00 0.00 89.32 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0	134.44 192.90 144.06 136.08 0.00 ned in the annua 20 such as:	l budget plan for as	Complied
	e) e) Financial indicators : cost benefit, discounted cash flow, return on investment - Major compliance -		on istration			



Criterio	n / Indicator	Assessment Findings	Compliance
		v. Road and bridges vi. Cost of production.	
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 budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2024) and well documented upon request.	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 mill received all crop by his own estates and the prices of FFB paid to the estate is in accordance with the prices set by the Malaysian Oil palm Board (MPOB) and subject to FFB Grading Report The pricing mechanism adopted is for worker salary which follow strictly to MAPA/NUPW As for contract work, the price determines by HQ. All contracts are kept in estate office. Sighted the Contract Agreement signed by Contractor and Estate.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.	Sighted, all contracts are fair, legal and transparent and agreed payments being made in timely manner as stipulated in the Contract Agreement, Clause 5. Payment of Invoices, No 5.3	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	Sighted, the Contract Agreement between KSG Enterprise Sdn Bhd and Sime Darby Plantation Sdn Bhd dated 30 th August 2019 on Transportation of FFB in Peninsular Malaysia. The contract valid until 28 th February 2020	
		Invoice No 19/0268 amounting RM68,158.08 being raised on 31st December 2019 for transporting FFB based on PO No 4300492807. The Payment to the contractor was made on 6th January 2020	
		In Bukit Cheraka Estate seen the Contract Agreement between Bio Technique Engineering and Sime Darby Plantation Sdn Bhd dated 30 th August 2019 on Boundary fencing for replanting field 2019A and 2019B . The contract valid from 1 st February 2019 until 31 st December 2019	
		Invoice No Bio/Bukit Cheraka Estate/026/2019 amounting RM154,336.00 being raised on 31st December 2019 for transporting FFB based on PO No 4300492456	
		The Payment to the contractor was made on 9 th January 2020. Both are made in timely manner as per Agreement.	
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.	All the contractors aware that estate is certified under MSPO. Therefore, the contractor has been instructed by estate management to follow the MSPO standard requirement.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	The policies were already communicated through the tender process and once contract sign by both parties. The contractor shall be subjected to the management system audits by auditors assigned by the management as and when deemed necessary. Seen, Vendor Integrity Pledge an a letter signed by Suppliers and Contractors on compliance to RSPO/ISCC/MSPO/SCCS. Sample taken on: 1. BMSPV Enterprise dated 29th October 2019 2. KSG Enterprise Sdn Bhd dated 1st October 2019 3. YIH Construction Sdn Bhd dated 8th July 2019	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Evidence all the Contractors in both Estates having valid Contract Agreement in executing the work. All the Contracts being signed by both parties, Management and Contractor. Sample taken on : - Sighted, the Contract Agreement between KSG Enterprise Sdn Bhd and Sime Darby Plantation Sdn Bhd dated 30 th August 2019 on Transportation of FFB in Peninsular Malaysia. The contract valid until 28 th February 2020	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.	The estates were audited by BSI Services Malaysia Sdn Bhd, MSPO auditors on 20 TH January 2020 – 21 st January 2020. Sighted audit plan which have been accepted by Sime Darby Plantations that the BSI	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	- Minor compliance -	Auditors to verify through a physical inspection if required for audit purposed	
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.	The completion of work will be monitored by the estate management. Upon completion of the work, the estate management will verify the quality of work. Payment will only be made upon approval by the Management and satisfactory work by the contractor	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.	There were no new plantings activities in all estates visited. Thus, it is not applicable for all estates	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	There were no new plantings activities in all estates visited. Thus, it is not applicable for all estates	NA



Criterio	n / Indicator	Assessment Findings	Compliance
	requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required.		
	- 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.	There were no new plantings activities in all estates visited. Thus, it is not applicable for all estates	NA
	- Major compliance -		
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.	There were no new plantings activities in all estates visited. Thus, it is not applicable for all estates	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.	There were no new plantings activities in all estates visited. Thus, it is not applicable for all estates	NA



Criterio	n / Indicator	Assessment Findings	Compliance
	- 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.	There were no new plantings activities in all estates visited. Thus, it is not applicable for all estates	NA
	- Major 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.	There were no new plantings activities in all estates visited. Thus, it is not applicable for all estates	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.	There were no new plantings activities in all estates visited. Thus, it is not applicable for all estates	NA
	- Major compliance -		
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.	There were no new plantings activities in all estates visited. Thus, it is not applicable for all estates	NA

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Criterion / Indicator		Assessment Findings	Compliance
	- 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.	There were no new plantings activities in all estates visited. Thus, it is not applicable for all estates	NA
	- Major 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.	There were no new plantings activities in all estates visited. Thus, it is not applicable for all estates	NA
	- Major compliance -		
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion.	There were no new plantings activities in all estates visited. Thus, it is not applicable for all estates	NA
	- Major compliance -		
Criterion	4.7.6: Customary land	,	



Criterio	n / Indicator	Assessment Findings	Compliance
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. - Major compliance -	There were no new plantings involving recognized customary land. Thus, it is not applicable for all estates	NA
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	There were no new plantings involving recognized customary land. Thus, it is not applicable for all estates	NA
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	There were no new plantings involving recognized customary land. Thus, it is not applicable for all estates	NA
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.	There were no new plantings involving recognized customary land. Thus, it is not applicable for all estates	NA



Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -		
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	There were no new plantings involving recognized customary land. Thus, it is not applicable for all estates	NA
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	There were no new plantings involving recognized customary land. Thus, it is not applicable for all estates	NA
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	There were no new plantings involving recognized customary land. Thus, it is not applicable for all estates	NA
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. - Minor compliance -	There were no new plantings involving recognized customary land. Thus, it is not applicable for all estates	NA



MS 2530-4:2013 Part 4: General principles for palm oil mills

Criterion / Indicator		Assessment Findings	Compliance	
4.1 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 commitments towards MSPO compliance being established through Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director dated 2 nd December 2019.	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 sustainability goals are in line with United Nations Sustainable Development Goals (UNSDG) 2030, which committed to: - 5. Promoting good governance and transparency 6. Contributing to a better society 7. Minimising environmental harm 8. Delivering sustainability quality This policy being guided by the commitments spelt out in the Company's: - 4. Responsible Agriculture Charter (RAC)	Complied	



Criterio	n / Indicator	Assessment Findings	Compliance
		5. Human Rights Charter (HRC)6. Innovation and Productivity Charter (IPC)	
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 Plantation, PSQM, Internal audit Procedure, Doc No; SD/SDP/PSQM/IAP, Revision 1, Date; 1/5/2015. The internal audit being conducted annually to implement and maintain the respective standard requirements effectively within the Group. The Management had drawn an Internal Audit Plan and it being carried out once a year to the Estate. The Internal audit conducted by SQM Malaysia & Central East RSQM.	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 -	The Internal Audit was planned to be conducted annually. The MSPO Internal Audit for Bukit Kerayong POM was conducted on 21st October 2019 and 23rd October 2019 at Bukit Kerayong POM by SQM Malaysia & Central East RSQM. The team Lead Auditor is Cik Eza Nurain Abdullah and assisted by Co- Auditor, Nor Atikah Mohd Hassan, Nurul Hayati Ibrahim, Raanon Gandon and Mohd Shuib bin Ishak. The NC's raised as follows: -	Complied

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Criterio	n / Indicator		Assessment Findings		Compliance
			Bukit Kerayong Mill		
		Major	5		
		Minor	4		
		OFI	1		
		All the findings were timeframe of 14 days	closed on 8 th November within the mandat s.	tory	
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit was responded by Mill Management within the acceptable timeframe.			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.	The procedure for Management Review, Standard Operation Manual, Sub-Section 5.6, dated: 25/5/2015) was established. The frequency for management review needs to be carried out at least once a year.			Complied
	- Major compliance -		view meeting was conducted on 6 th Decem red by the Mill Manager. The meeting attend		

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Criterio	n / Indicator	Assessment Findings	Compliance
		by 18 representatives. The agendas discussed in the meeting are the following: j. Audit results and Status of preventive and corrective actions, k. Effectiveness of EQMS, l. Follow – up actions from previous management reviews, m. Customer Feedback n. EQMS document review o. Analysis of data and review of QSHE Objectives / Management Programme	
Criterion	4.1.4 – Continual Improvement	p. Other matters	
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. - Major compliance -	Mill has developed the Kaizen Charter projects, for instance: - 1. Enhance KKS Bukit Kerayong yearly palm product volume production with improvement of mill utilization from 58% to 74%.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		 Increase yearly PK Shell saving from RM109,464 to rm 243,024 in FY2019. Saving on TNB consumption cost from average RM 45,919/month to RM 40,000 / month by end of 2019 	
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. The Mill has indicated their commitment to continuously improve or create new innovation to optimize mill operation as evident in Continual Improvement Plan.		Complied
	- Major compliance -	Mill has established a few systems to improve the practice of mill performance as per advice by Mill Advisor.	
		As per audit, sighted training records for mill workers on various topics that enhance continuous improvement of mill performance. There is no new application of new technology implemented during the certification period.	
4.2 Princ	iple 2: Transparency		
Criterion 4	2.2.1 – Transparency of information and documents relevant to MSPO r	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.	Sime Darby has established Mill Quality Management System, Level 2, Standard Operation Manual Sub —Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External	Complied



Criterion	n / Indicator	Assessment Findings	Compliance
Criterion	- Major compliance -	communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008. The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Social Issues. The mechanism is to enable effective and timely communication with employees and external interested parties. The audit team observed that the above SOP specifies the means to communicate and consult with the relevant stakeholders pertaining to the company's safety & health, social, environmental and other aspects. The SOP also specifies the timeframe to be taken to provide	Compliance
		feedback to the stakeholder is 2 weeks from the date receiving the queries. Sighted request from external stakeholders in 2019. Sample taken on 23 rd October 2109 by Dr. Zadariana Jamil from Uitm Shah Alam request on sample of POME and EFB for research purposes at the University. The application being approved and granted on 1 st November 2019.	
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	Sime Darby Plantations Bhd website, http://www.simedarbyplantation.com/ have been a medium to	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	social outcomes. - Major compliance -	disseminating public information ie; The Sustainability Report, Group Annual Report and Procedure for complaints and grievances. Information relating to land titles, safety and health plans, pollution prevention plan is available at the Mill.	
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 -	Sime Darby has established Mill Quality Management System, Level 2, Standard Operation Manual Sub —Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008. The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Social Issues. The mechanism is to enable effective and timely communication with employees and external interested parties.	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 person in charge for transparency agenda is En. Khairul Shahrin Mohd Yusof, Assistant Engineer as the persons responsible vide letter dated 2 nd January 2020 by Mill Manager.	Complied



Criterion / Indicator		Assessment Findi	ings	Compliance
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 -	categori 1 2 3 8 10	older list was made available during ized as follows: - Category Vendor / Suppliers Local communities Other Interested Parties Estate / Mill Transporter CPO Total keholders list being updated in Ja	Total Number 72 13 26 7 9 127	Complied



Criterion / 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 -	Standard Operating Procedures for Sustainable Supply Chain & Traceability Appendix 15, Version 2 2018 issuance Feb 2018 was established and to ensure effective implementation on sustainable supply chain and traceability of FFB. The Standard Operating Procedures also specifies the identified CCPs of which the risk of mixing of certified and non-certified FFB is possible as well as the control of the flow and transportation of the FFB from the harvesting block to the weighbridge and subsequently to the POM.	Complied	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place through Central Reporting System (CRS). Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the FFB received. In Bukit Kerayong POM, sighted the FFB Receive Summary Report by Supplier with each estate code numbers.	Complied	
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The person in charge for transparency agenda is En. Khairul Shahrin Mohd Yusof, Assistant Engineer as the persons responsible vide letter dated 2 nd January 2020 by Mill Manager	Complied	



Criterio	n / Indicator	Assessment Findings	Compliance
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	The records of CPO sales have been verified. The dispatch of the CPO is determined by HQ Sales & Marketing and will be entered into the CXC (online system for contracting) and SIME-WEIGH for producing the dispatch ticket. The weigh bridge operator will check the system before releasing the dispatch.	Complied
	4.3 Principle 3: Compliance to legal requirements Criterion 4.3.1 – Regulatory requirements		
	, , , I		
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	Compliance to each applicable law and regulation is monitored by the operating units. Sighted the sampled evidence of compliancy to the regulation as follows: i. MPOB License. License no. 562906004000. For processing 180000 ton FFB. Validity period from 1/8/2019 - 31/7/2020 ii. DOE's Compliance Schedule License no. 003124. Validity period from 1/7/2019 - 30/6/2020 iii. DOE's Contradiction License no. 003771 Validity period from 5/6/2019 - 4/6/2020	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		 iv. Boiler Certificate of Fitness. Inspection has been cinducted on 6/1/2020. DOSH Approval no. SLK 23. Payment has been made as per receipt no. SL/RE/20/28464. Competence person license i. Authorised Entrant and Standby Person for Confined Space, a. Serial no. NW-HQ-AE-R-1151-R. Validity period till 25/1/2021. 	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	List of applicable legal and other requirements was made available during the assessment and complied in the Plantation Quality Management System Data. The Legal & Other Requirements Register (LORR) covers all the necessary regulatory requirements. The LORR was reviewed on 15 th January 2020	Complied
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 -	The periodic review and evaluation on the legal requirement register to ensure that any new/addition as well as changes and amendment are captured and update, through the following manner: ii) Plantation Sustainability and Quality Management Department	Complied



Criterion / Indicator		Assessment Find	lings	Compliance
	ii) Enquirin	g the laws books publis	her	
	iii) Commu	nication with law/enforce	ement officers	
	iv) Website			
	The new revision	n in 2020 at Mill are as f	follows: -	
	Revision Date	Description	Section Affected	
	15 th Jan 2020	Minimum wages Order, Amendment 2019	Paragraph 3 & 4	
	15 th Jan 2020	Fire Services Act 1988 (Act 341) Amendment 2019	 6. New section 27A 7. New section 61A 8. Amendment section 33 9. Amendment section 56 10. Amendment section 62 	



Criterion / Indicator		Assessment Find	lings	Compliance
	1 st March 2020	Occupational Safety And Health (Noise Exposure) Regulations 2019	New regulation under OSHA Comes into operation on 1st June 2019	
	1 st March 2020	Factories and Machinary (Noise Exposure) Regulations 1989 (Revoked)	Revoked on 1 st June 2019	
	31 st July 2020	Children and Young Persons (Amendment) Act 2010	Amendment, Comes into operation on 1 st June 2019	
	31 st July 2020	Land Acquisition Act (Amendment) 2016	Newly added	
	21 st Jul 2020	Pesticides (Amendment of 1 st Schedule) Order 2019	Newly added	



Criterio	n / Indicator	Assessment Findings	Compliance
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.	The person in charge for legal agenda is En. Mohd Hafiz Md Hashim, Assistant Engineer as the persons responsible vide letter dated 2 nd January 2019by Mill Manager	Complied
	- Minor compliance -		
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
	- Major compliance -	uisputes.	
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.	The mill was located in Bukit Kerayong Estate in lot 2894 under land title no. 52712.	Complied
	- Major compliance -		
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	Legal parameter boundary were clearly demarcated with fences.	Complied
	- Major compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
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). - Minor compliance -	There were no issues of land disputes in the Mill	Complied
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 were no issues of land disputes in the Mill	Complied
	- Major compliance -		
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available.	There were no issues of land disputes in the Mill	Complied
	- Minor compliance -		
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.	There were no issues of land disputes in the Mill	Complied
	- Major compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance	
4.4 Principle 4: Social responsibility, health, safety and employment condition				
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. - Minor compliance -	The SIA was conducted on 02 nd to 04 th November 2015. The Social Management Plan for FY2020 has been established by Mill. The Social Management Plan indicates the objectives, category, types/location, actions, frequency, Person in-charge and monitoring period.	Complied	
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 Plantation Quality Management System, Level 2, Standard Operation Manual Sub –Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008.	Complied	
		The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Social Issues.		



Criterio	n / Indicator	Assessment Findings	Compliance
		Under Group policies and authority's GPA No 85 Whistleblowing channels are established to help all stakeholders raise concerns, without fear or retaliation, on any wrongdoing that they may observe in the Sime Darby Group. The statement can be viewed through http://www.simedarbyplantation.com/	
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.	The Standard Operation Manual under clause 6.3 Timeframe for External Communication has stated: -	Major NC
	- Major compliance -	 Within 2 weeks of the date of receipt for communication requiring direct feedback and if the case is not solved, it will be cascaded to the further steps as per SOP. 	
		Within 1 week of the completion of the investigation for communication requiring investigation.	
		Non- Conformity - Major	
		Any repairs required by Internal Stakeholders need to fill-up the House Repair Requisition Form.	
		Sample taken on House No WQ-47; Mr Kumaren dated 25th June 2019 on leaking washing basin, damage of concrete drain and faulty lamp.	
		Faulty lamp being repaired by the Mill Charge-man. However, other repairs which incurred higher cost a quotation is required as the work will be outsourcing.	



Criterio	n / Indicator	Assessment Findings	Compliance
		Sample taken on the quotation being obtained from contractor, Biglenz Tech Services on 4th November 2019 and work has been approved on 12th November 2019 through Doc No 4300487407. Seen, the invoice under No 0000030 being submitted on 18th November 2019.	
		No evidence, all the repairs being resolved in an effective, timely and appropriate manner, which is accepted by all parties as per Plantation Quality Management System, Level 2, Standard Operation Manual Sub – Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008 under Clause 6.3.	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.	Internal and external complaint is through complaint form available at Mill office.	Complied
	- Minor compliance -	In case the complainant would want to make an anonymity complaint it can be made through electronic Complaint form or email to Senior Director or Whistleblowing committee or toll-free number or fax or by mail.	
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 -	Latest meeting with stakeholder was conducted in collaboration with Bukit Kerayong Estate, Bukit Cheraka Estate and Bukit Kerayong Mill. Stakeholder meeting was conducted on 4/12/2019 attended by 31 representatives. The meeting was chaired by En Syed Muzharel Azhar bin Syed Mohamad, Bukit Cheraka Estate Manager. There was no major issue raised during the meeting.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance	
		All the workers are aware and able to explain on the complaint mechanism. The common complaints were on maintenance of quarters.		
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.	In Bukit Kerayong Mill, sighted all internal and external complaints filled, responded and the records being maintained for the last 24 months.	Complied	
	- Major compliance -			
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. - Minor compliance -	Sighted request from external stakeholders in 2019. Sample taken on 23 rd October 2109 by Dr. Zadariana Jamil from Uitm Shah Alam request on sample of POME and EFB for research purposes at the University. The application being approved and granted on 1 st November 2019.	Complied	
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.	Sime Darby has established the Group Policy on Health and Safety signed by the Managing Director on Jan 2015. The policy has been communicated to the workers through induction training for new	Complied	

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Criterion / Indicator	Assessment Findings	Compliance
- Major compliance -	workers, morning briefing and displayed at various notice board within the estate. The GSQM team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition. The mill has established Safety and Health Plan and reviewed on	
	annually basis. The plan covers on OSH Legal Compliance, Emergency Response Plan, OSH Management System and Risk Management, HIRADC, training, OSH committee meeting, workplace inspection, medical surveillance and etc. Sighted the implementation of the management plan FY 2019 as follows:	
	i. Medical Surveillance for workers expose with chemicals was conducted on annually basis. Latest surveillance was conducted on $30-31/12/2019$ for 8 workers. The mill has yet to receive the report. For FY 2018, the medical surveillance was conducted in May and October 2018 by certified OHD with reg. no HQ/08/DOC/00/329. 9 workers were send for surveillance and found fit to work as chemical handler.	
	ii. Audiometric test was conducted on annually basis. Latest test was done on 11/2/2019. 60 workers were send for the test. 2 workers were found with hearing impairment with 1 with STS. Refer report no. PRO/FEB/19(BKPOM/60), JKKP H/E 127/12/4-65/17.	



Criterio	n / Indicator	Assessment Findings	Compliance
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:	Sime Darby has established the Group Policy on Health and Safety signed by the Managing Director on Jan 2015. The policy has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the estate. The mill has conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and	Major NC
	 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 	Risk Control (HIRARC). The assessment cover all main operations and support operations such as harvesting, weeding, manuring, office operation, security, pest and disease and other support operation. The HIRARC was reviewed at minimum once a year, if accident occur or changes on the operation. Latest HIRARC review was on 3/1/2020 with no changes was made since the last reviewed.	
	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). e) The management shall establish Standard Operating Procedure	Sighted during site visit, the ramp operator who control the FFB lever into cages were found sitting on a high chair (same level as the hand rail) which is considered as unsafe act. Noted during document review, the activity was not captured in the HIRARC	
	for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.	register. Sighted during site visit at the workshop, the Oxygen and Acetylene tank was chain at proper places. This was against HIRARC dated 9/8/2016, reviewed on 3/1/2020 and SOP no. BKOM07/47-16.	



Criterion / I	indicator	Assessment Findings	Compliance
f) g) h) j)	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 and collective agreements. 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 ant the concerns of employees and any remedial actions taken shall be recorded. Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. 4ajor compliance -	The mill has established training program for employees exposed to chemicals used at the palm oil mill to ensure the continuous awareness to the employee. The training was conducted by the Manager, Asst. Manager and representative form the chemical suppliers to the supervisors and operators. Sighted the sampled training records as follows: i. Boiler chemical hazard, safety practices and awareness training dated 10/12/2019. The mill provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008. PPE issuance was recorded in PPE Issue logbook and store BIN Card. The records in the logbook was done by workers basis for monitoring purpose. Sighted the records for laboratory workers with employee no. 36036, 147291, 147878, 152452 154465. Laboratory works was provided with safety shoes, safety helmet, safety vest, Ear plug, nitrile gloves, half face respirator, and safety goggles. Procedures of chemical handling is presented in several documents, such Document No. SD/SDP/SQM (ESH)/001-1Sime Darby Plantation Environment, Safety, and Health Management System (ESHMS) Manual dated July 1st, 2012.	Compliance
		Sighted during site visit at the workshop, diesel and lubricant were stored in secondary container without any label. This is against the	



Criterion / Indicator	Assessment Findings	Compliance
	SOP established in Occupational Safety and Health Manual, Chapter no. 9: Chemical Safety Management ver. 1, Issued no. 1 dated 20/8/2008 under section 6.0: Procedure for Handling, which stated 'iii. Ensure that the container are properly labelled, not damaged and no spillage during handling.'	
	The Mill Manager has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter dated 2/1/2019 signed by the Regional CEO. Estate management has appointed Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the OSH achievement, accident and incident report, OSHA compliance, PPE issue, first aid kit monitoring, PPE monitoring, workplace inspection, firefighting equipment monitoring and training. Sighted the minutes meeting records as follows:	
	i. 18/1/2019	
	ii. 18/4/2019	
	iii. 31/7/2019	
	iv. 30/10/2019	



Criterion / Indicator	Assessment Findings	Compliance
	The OHS Chairman and Secretary are in coordination with RSQM Head Quarter Officer for any update national regulations and collective agreements.	
	Accident of emergency procedure is presented in Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3.	
	Noted during interview with workers show the satisfactory understanding on the emergency procedure established. Training was conducted as follows:	
	i. Fire drill and safety briefing dated 16/12/2019	
	ii. ERP, Fire Fighting collaboration with Fire Dept. Kuala Selangor dated 3/5/2019	
	First aider present at various work station at the mill with apponited responsible person. Latest training was conducted om 19/11/2019. The first aid monitoring was done on monthly basis. Sighted the monitoring records dated November 2019, December 2019 and January 2020. Noted during site visit and interview with workers noted that workers aware regarding the location of the nearest first aid kit from their work station.	
	The mill maintain the records of accident cases and documented in the "Laporan dan Siasatan Kemalangan" log and reported to HQ	



Criterio	n / Indicator	Assessment Findings	Compliance
Criterion	4.4.5: Employment conditions	using the PSQM-ESH Monthly update form. The accident occurred was reviewed on quarterly basis during OSH committee meeting. Both estates visited submit the JKKP 8 form on annually basis to DOSH through MyKKP website.	
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 employees. - Major compliance -	Sime Darby has established Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha; Group Managing Director dated 2nd December 2019. Human rights element being spelt out under the followings: - i. Human Rights Charter – Clause 3.2, We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: 1. Providing equal opportunities 2. Respecting freedom of association 3. Eradicating any form of exploitation 4. Ensuring favorable working conditions	Complied



Criterior	n / Indicator	Assessment Findings	Compliance
		 Enhancing safety and health Respecting community rights and the rights of indigenous people Protecting the Rights of vulnerable people Protecting the rights of children Eliminating violence and sexual harassment Responsible Agriculture Charter – Clause 2.2 Protect Labor standards and enhance employment conditions. Sime Darby Plantation Group, Vendor COBC dated 30th May 2018 under Clause 5, Labor and Human Rights Communication of all the policies to workforce is through training and during shift briefing. Seen, the communication to External Stakeholders through the Stakeholder Meeting. 	
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 established Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha; Group Managing Director dated 2nd December 2019. Human rights element on discriminatory practices and equal opportunity being spelt out under the followings: -	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	4. Human Rights Charter 5. Responsible Agriculture Charter 6. Responsible Agriculture Charter No evidence of discrimination based on race, skin color, religion, gender, national origin, ancestry, disability, marital status, and sexual orientation was found in both Estates. During interviews with internal and external stakeholders, it is clearly stated no discrimination at Mill. Pay and conditions are documented in the workers' Contract Agreement and wage payment records / pay slip. The salary is according to 'Guidelines on the Implementation on the Minimum Wages'. National Wages Consultative Council Act 2018 (Act 732) Malaysian minimum salary is RM1100.00 as stated in the guidelines. Rate of pay is based on MAPA / NUPW Agreement Salary Scale as seen in the Contract Agreement and pay-slip. All the workers are under Mill pay-roll system. Sample taken on the workers below: Bukit Kerayong Mill p. BKPOM Employee Code - 0000152359	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		q. BKPOM Employee Code - 0000141120 r. BKPOM Employee Code - 0000154358 s. BKPOM Employee Code - 0000006776 t. BKPOM Employee Code - 0000141124	
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. - Minor compliance -	The mill having several contractors and transporters. Sample taken on the following: - Sighted the Contract Agreement between Jasa Korporat Sdn Bhd and China Engineers (Malaysia) Sdn Bhd's on the transportation of Crude Palm Oil (CPO) for the China Engineers (Malaysia) Sdn Bhd's Peninsular Malaysia Oil Mills . The contract valid from 1st May 2019 and 30th April 2020. Seen, Contract Agreement between KSG Enterprise and his workers, namely: - 1. Mr. Azman bin Abu Bakar – 680703-10-5629 Sighted the pay slip, EPF, SOCSO and SIP and contract agreement of all the worker	Complied
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	Sime darby has established Employee Master Details Listing system for all data of their workers.	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	Sighted at Bukit Kerayong Estate the Personal Particulars data for all the workers in The Employee Master Listing. The report stated the Personal Info, Statutory, Bank Info, Gang Info and LTIP Components. In addition, the employment contract is also found to be established and signed and maintained by the company	
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 stated the offered position, wages implied, working hours, OT, allowances, rest day, working on holiday etc Sighted, Employment Contract between the Estate and the workers. The Agreement stated all the term and conditions according to Malaysian Law. The contract is in Bahasa Malaysia, and Indonesian. This contract is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of local and Indonesian. Sample taken on the following workers: - Bukit Kerayong Mill a. BKPOM Employee Code - 0000152359 b. BKPOM Employee Code - 0000141120	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		c. BKPOM Employee Code - 0000154358 d. BKPOM Employee Code - 0000006776 e. BKPOM Employee Code - 0000141124	
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 -	Working hours is 8 hours. From Monday to Saturday. The overtime maximum is 104 hours according to Malaysian Law. Seen the working hours being displayed at the notice board. Estate has used punch card as a working time recording system.	Complied
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 the legal requirements applicable. - Major compliance -	The working hour and break time have been clearly stated in the Employment Contract. Sighted in the Contract Agreement the rate of overtime which agreed by both parties. There is no complaint received regarding payment or are forced to work overtime during site interview.	Complied
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 -	Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker. Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made.	Major NC



Criterion / Indicator	Assessment Findings	Compliance
	Documented payslip was distributed to individual workers on the day of payment.	
	Non — Conformity — Major	
	In Bukit Kerayong POM, found that Latchumy (Employee ID: 00006767) and Kavitha (Employee ID: 000006776) has worked on night shift after 10 pm without having the Permit for Female Nightshift by Labour Department as below:	
	a. Kavitha:	
	1. 2/08/2019: 1526-2301	
	2. 3/08/2019: 1513-2256	
	3. 8/08/2019: 1533-2300	
	4. 13/08/2019: 1502-2306	
	5. 16/08/2019: 1500-2300	
	6. 24/08/2019: 0804-2300	
	7. 30/08/2019: 0756-2306	
	8. 7/10/2019: 1509-2300	



Criterion / Indicator	Assessment Findings	Compliance
	9. 9/10/2019: 1511—2300	
	10. 10/10/2019: 1510-2258	
	11. 21/10/2019: 1511-2306	
	12. 18/12/2019: 1458-2304	
	b. Latchumy:	
	1. 6/8/2019: 1453-2303	
	2. 7/8/2019: 1512-2308	
	3. 9/8/2019: 1506-2300	
	4. 17/8/201: 1454-2218	
	5. 19/8/2019: 1445-2259	
	6. 20/8/2019: 1450-2231	
	7. 21/8/2019: 1453-2256	
	8. 22/8/2019: 1452-2308	
	9. 23/8/2019: 1449-2319	



Criterior	/ Indicator	Assessment Findings	Compliance
		10. 26/8/2019: 1454-2250	
		11. 2/10/2019: 1457-2230	
		12. 3/10/2019: 1457-2305	
		13. 5/10/2019: 1652-2300	
		14. 12/10/2019: 1803-2306	
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.	All foreign workers have been provided with SOCSO and with regards to local workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations	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. - Major compliance -	The Bukit Kerayong POM line site was inspected during the assessment. The condition of the housing facilities is deemed appropriate. Each house is shared by 6 workers (for single workers). Water and electricity is borne by the workers. The line site is found cleaned. Rubbish are collected periodically and each house are provided with rubbish bin. Surau is available at the linesite.	Complied



Criterion	ı / Indicator	Assessment Findings	Compliance
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 has established Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha; Group Managing Director dated 2nd December 2019. Human rights element on sexual harassment and violence at the workplace being spelt out under the followings: - 4. Human Rights Charter 5. Responsible Agriculture Charter 6. Responsible Agriculture Charter No harassment & violence and assessment for new mothers (infants under 24 months) was reported in 2019. The audit team had confirmed during interview with workers.	Complied
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 negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	Sime Darby has established Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha; Group Managing Director dated 2nd December 2019. Human rights element on 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 being spelt out under the followings: -	Complied



Criterion	ı / Indicator	Assessment Findings	Compliance
		5. Responsible Agriculture Charter 6. Responsible Agriculture Charter Local or foreign workers are given the freedom which it is an optional for them to join worker union formed at Mill. Thus, their freedom are not restrict by Mill Management.	
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 Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha; Group Managing Director dated 2nd December 2019. Human rights element on Children and young persons shall not be employed or exploited being spelt out under the followings: - 4. Human Rights Charter 5. Responsible Agriculture Charter 6. Responsible Agriculture Charter There are no children below ages of 18 working in the Mill and this was proven through checking the list of employees as well as their biodata and through Mill visits.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
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 -	The mill has established training plan base on the training need analysis conducted. The training plan covers all job designation including the contractors. Sighted the sample training records as follows: i. Boiler chemical hazard, safety practices and awareness training dated 10/12/2019. ii. Firedrill and safety briefing dated 16/12/2019 iii. ERP, Fire Fighting collaboration with Fire Dept. Kuala Selangor dated 3/5/2019 iv. Company policies and COBC briefing dated 7/12/2019 v. Tractors drivers for On-site training dated 11-12/9/2019 vi. Simecard, unsafe working and unsafe area training dated 2/12/2019	Complied
		vii. Lock out, take out training dated 3/5/2019 viii. Confined space (Drager) training dated 4/4/2019	
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	The estates visited has conducted training need analysis for all employee, management and contractors. The need analysis was	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	employees based on their job description. - Major compliance -	conducted base on the job designation and training required by the job type. 27 training was identified for management, employee and contractors and programmed throughout FY 2020.	
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 and responsibility in accordance to the documented training procedure.	The estates visited has training program which updated annually. The annual internal audit by GSQM and management review does review the effectiveness of the training plan and its execution.	Complied
	- Minor compliance -		
4.5 Princ	iple 5: Environment, natural resources, biodiversity and ecosy	stem 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. - Major compliance -	Sime Darby has established Environmental Policy signed by the Managing Director on January 2015. The policy has been communicated to the workers through briefing, training and displayed on signboard.	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives;	Both estates visited has established environmental management plan base on aspect and impacts analysis conducted.	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	b) The aspects and impacts analysis of all operations - Major compliance -	The environmental management plan was established base on Environmental Aspect Impact Identification and Environmental Impact Evaluation conducted and documented in Pollution Prevention Plan. The EAI/EIE was reviewed by the estate management team. The management plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated Environmental Issue, Mitigation Measures and Person Responsible. The EAI/EIE and management plan was reviewed on annually basis. Latest review was conducted on 2/1/2020.	
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 -	The estate has established Environmental Improvement Plan/Pollution Prevention Plan FY 2020. The plan was reviewed on annually basis. Sighted the implementation of the management plan FY 2019 as follows: i. The mill monitor the effluent discharge to furrow on daily basis. Sighted the records of discharge for the month of September, October and November 2019. ii. Sighted during site visit, leachate from EFB storage yard were collected into collection sump and pump to effluent pond. iii. The mill send the final discharge water to Sime Darby R&D on quarterly basis. Sighted test report no. EP14/2020, EP498/2019 and EP450/2019	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Program to promote positive impact was documented in Environmental Improvement Plan/Pollution Prevention Plan FY 2020. The management plan also include a program to promote positive impact as follows: i. Use more fiber and reduce usage of shell to reduce black smoke emission. ii. New boiler equips with dust collector system.	Complied
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 -	The estate visited continue provided training to ensure the awareness regarding the environmental policy among the employee. The estates management has established annual training program which covers the environmental awareness and compliance related trainings to the executives, staffs and workers.	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 estate visited has discussed on environmental issue during Environmental Performance Monitoring Committee meeting where representative of the management and employee raised their concerns about environmental quality in the estates.	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	The estate visited maintains records of energy usage, which is reported monthly to head office through SAP system. The	Complied

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Criterio	n / Indicator		Assessment Finding	gs .	Compliance		
	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		monitoring of non-renewable energy usage was conducted on monthly basis. Sighted the records as follows:				
	- Major compliance -						
		Month	Consumption/FFB				
		Jan 19	0.27				
		Feb 19	0.22				
		Mar 19	0.32				
		Apr 19	0.29				
		May 19	0.31				
		Jun 19	0.32				
		Jul 19	0.29				
		Aug 19	0.26				



Criterion / Indicator		Assessment Findings			Compliance
		Sep 19	0.32		
		Oct 19	0.29		
		Nov 19	0.32		
		Dec 19	0.46		
		The estate has established the management plan to optimize the usage of diesel and documented in the Environmental Improvement Plan/Pollution Prevention Plan FY 2020 established.			
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 -	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets			Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Renewable energy used is from biofuel (shell and fiber) for boiler start-up. Sighted the records for usage of renewable energy FY 2019 as follows:			Complied





Criterion / Indicator	Assessment Findings			Compliance
	Month	Shell/ton FFB	Fiber/ton FFB	
	Jan 19	0.13	0.14	
	Feb 19	0.13	0.14	
	Mar 19	0.13	0.14	
	Apr 19	0.13	0.14	
	May 19	0.10	0.14	
	Jun 19	0.13	0.14	
	Jul 19	0.13	0.14	
	Aug 19	0.12	0.14	
	Sep 19	0.14	0.14	
	Oct 19	0.14	0.14	



Criterio	n / Indicator	Assessment Findings		Compliance		
		Nov 19	0.12	0.14		
		Dec 19	0.14	0.14		
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 -	The mil has identified the waste products and source pollution and documented in Waste Management Plan FY 2020. The plan was reviewed on annually basis. The waste has been identified as follows: i. Schedule waste: used lubricants, used batteries, contaminated rags, gloves, absorbent, used chemicals and expired chemicals. ii. Domestic waste: Rubbish iii. Industrial waste: Scrap iron iv. Mill waste: EFB leachate				Complied
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.	The mill has established waste management plan as per waste identification. The plan was reviewed on annually basis. Latest review was conducted on 2/1/2020. Sighted the implementation of the management plan FY 2019 as follows:				Complied



Criterior	n / Indicator	Assessment Findings	Compliance
	 b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. - Major compliance - 	 i. Sighted at the EFB Yard, the EFB wall, sump pit has been constructed and pump has been installed. EFB leachate was pump into sludge pit and to effluent treatment plant. ii. The mill maintain and report the generation of schedule waste to DOE on monthly basis through E-SWISS. Sighted the inventory report for the month of October, November and December 2019. The mill has requested extension of time from DOE as per approval letter ref. no. (B) B 31/152/000/067 Jld (9) dated 28/10/2019. The extension time approved was from 28/10/2019 till 28/10/2020. 	
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 -	Procedure for Scheduled Waste Management was established (SD/SDP/PSQM (ESH)/203-EN1 dated 26/2/2016. Proper disposal of waste material are carried out as per the company procedures. The procedures are fully understood by workers and managers. The mill have a designated Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estate visited. The mill maintain and report the generation of schedule waste to DOE on monthly basis through E-SWISS. Sighted the inventory report for the month of October, November and December 2019.	Complied
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.	Domestic waste was collected once a week by contractors appointed by the Majlis Perbandaran Klang and Majlis Daerah Kuala	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	- Minor compliance -	Selangor and disposed at the municipal landfill. Sighted the domestic collection records in Domestic Waste Record Book.	
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 -	The mill has conducted assessment of all polluting activities in the Environmental Aspect Impact and Environmental Impact Evaluation. A management plan has been established based on the significant aspect and DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling.	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The mill has conducted assessment of all polluting activities in the Environmental Aspect Impact and Environmental Impact Evaluation. A management plan has been established based on the significant aspect and DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling. The plan was reviewed on annual basis.	Complied
		Sighted the sampled if stack sampling conducted as follows:	
		i. Report no.: ALM/SIMEDARBY/0219/4616	
		Date sampled: 12/2/2019	
		Date report: 28/2/2019	

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Criterio	n / Indicator	Assessment Findings				Compliance
		Contra	to EQA (Clean Andiction License number)	o. 003771	014 DOE's	
				, .	014 DOE's	
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 -	Treated POME discharge was regularly monitored as prescribed under Compliance Schedule License no. 003124. Limit of Biochemical Oxygen Demand (BOD) discharge is 5000 mg/l for land application. Regular monitoring was done on monthly basis and every quarterly via Quarterly return form to DOE for compliance. Sighted the quarterly return form as follows:				Complied
		рН	Oct 7.70	Nov 7.90	7.70	



Criterio	Criterion / Indicator		Assessment Findings			Compliance
		BOD	326	136	520	
		S. Solid	1140	600	500	
			nalysis confirm vedule License no.		prescribed under	
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: a) Assessment of water usage and sources.	in Identification to reduce fresh areas of concer person responsil	The mill has established water management Plan and documented in Identification and Management of wastewaters and Action Plan to reduce fresh water usage. In the plan stated the water source, areas of concern, monitoring, contingency plan, mitigation plan, person responsible and time frame. Sighted the implementation of the management plan as follows:			Complied
	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. The mill continue to monitor the water consumption. Sighted the records of water consumption as follows:			
	c) Ways to optimize water and nutrient usage and reduce wastage	Month L/FFB				
	(e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).	Jan 19	2.34			
	- Major compliance -	Feb 19	2.43			

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Criterion / Indicator		Assessment Findings	Compliance
	Mar 19	2.84	
	Apr 19	2.75	
	May 19	1.94	
	Jun 19	2.45	
	Jul 19	4.96	
	Aug 19	2.27	
	Sep 19	2.66	
	Oct 19	2.43	
	Nov 19	2.67	
	Dec 19	2.38	



Criterion / Indicator		Assessment Findings	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. - Major compliance -	Treated POME discharge was regularly monitored as prescribed under Compliance Schedule License no. 003124. Limit of Biochemical Oxygen Demand (BOD) discharge is 5000 mg/l for land application. Regular monitoring was done on monthly basis and every quarterly via Quarterly return form to DOE for compliance.	of nd nd	
4.6 Princ	ciple 6: Best Practices			
Criterion	4.6.1: Mill Management			
4.6.1.1 Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -		SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill.	Complied	
		Sime Darby has established a system to monitor the mill operation. The Mill advisor, Structured Oil Recovery Assessment (SORA) and Planning and Monitoring Unit visited the operating units on timely basis. Their reports covers on all aspect of operation.		
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	supervision headed by an Engineer. All process parameters are		



Criterion / Indicator		Assessment Findings	Compliance
		The Mill advisor, Structured Oil Recovery Assessment (SORA) and Planning and Monitoring Unit visited the operating units on timely basis. Their reports covers on all aspect of operation.	
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 -	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan for FY2019 contains FFB yield, CPO, OER, and KER, costs of production, milling utilization, FFB pricing etc. It also includes environment, social (workers and staff's welfare), and health and safety component and associated capital expenditure for improvement of smallholder schemes.	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 mill received all crop by his own estates and the prices of FFB paid to the estate is in accordance with the prices set by the Malaysian Oil palm Board (MPOB) and subject to FFB Grading Report The pricing mechanism adopted is for worker salary which follow strictly to MAPA/NUPW	Complied



Criterio	n / Indicator	Assessment Findings	Compliance	
		As for contract work, the price determines by HQ. All contracts are kept in estate office. Sighted the Contract Agreement signed by Contractor and Mill.		
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Sighted, all contracts a re fair, legal and transparent and agreed payments being made in timely manner as stipulated in the Contract Agreement, Clause 5. Payment of Fee, No 5.1 Sighted, the Contract Agreement between Jasa Korporat Sdn Bhd and The China Engineers (Malaysia) Sdn Bhd on Transportation of Crude Palm Oil for The China Engineers (Malaysia) Sdn Bhd's Peninsular Malaysia Oil Mill. The contract valid from 1st May 2019 until 30th April 2020	Complied	
Criterion	4.6.4: Contractor			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	All the contractors aware that estate is certified under MSPO. Therefore, the contractor has been instructed by estate management to follow the MSPO standard requirement. The policies were already communicated through the tender process and once contract sign by both parties. The contractor shall be subjected to the management system audits by auditors assigned by the management as and when deemed necessary	Complied	



Criterio	n / Indicator	Assessment Findings	Compliance
		Seen, Vendor Integrity Pledge a letter signed by Suppliers and Contractors on compliance to RSPO/ISCC/MSPO/SCCS. Sample taken on:- 1. Jasa Korporat Sdn Bhd dated 1st July 2019 2. Lotus Two Enterprise dated 22nd January 2020	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Evidence all the Contractors in both Estates having valid Contract Agreement in executing the work. All the Contracts being signed by both parties, Management and Contractor. Sample taken on : - Sighted, the Contract Agreement between Jasa Korporat Sdn Bhd and The China Engineers (Malaysia) Sdn Bhd on Transportation of Crude Palm Oil for The China Engineers (Malaysia) Sdn Bhd's Peninsular Malaysia Oil Mill. The contract valid from 1st May 2019 until 30th April 2020	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 estates were audited by BSI Services Malaysia Sdn Bhd, MSPO auditors on 20 TH January 2020 – 21 st January 2020. Sighted audit plan which have been accepted by Sime Darby Plantations that the BSI Auditors to verify through a physical inspection if required for audit purposed	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 SOU 7 – Bukit Kerayong Palm Oil Mill and Supply Base Certification Unit complies with the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder and MS 2530-4:2013 Part 4: General principles for palm oil mills. It is recommended that the certification of SOU 7 – Bukit Kerayong Palm Oil Mill and Supply Base Certification Unit is approved and/or continued.

Acknowledgement of Assessment Findings	Report Prepared by
Name:	Name:
Noor Arizan Ahmad	Muhammad Fadzli Masran
Company name:	Company name:
Sime Darby Plantation Berhad	BSI Services Malaysia Sdn. Bhd.
Title:	Title:
SOU 7 Chairman	*Client Manager
Signature Sime Darby Plantation Berhad Bukit Cheraka Estate (647766-V) NOOR ARIZAN BIN AHMAD Senior Manager	Signature:
Date: 13/4/2020	Date: 9/4/2020



Appendix A: Assessment Plan

Date	Time	Subjects	MFM	11
Sunday 19/01/2020	PM	Audit Team Travelling	√	√
Monday 20/01/2020	08.30 – 09.00	 Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan 	V	√
Bukit Kerayong Estate	Bukit $09.00-12.30$ Field visit, boundary inspection, field operations, staff Workers interview, buffer zone, HCV area, IF		V	√
	09.00 - 11.30	Stakeholder interviews		√
	12.30 – 13.30		√	√
	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.	√	√
Tuesday 21/01/2020 Bukit Cheraka Estate	08.30 – 12.30	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	√
	09.00 - 11.30	Stakeholder interviews		√
	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)	√	V



	16.30 - 17.00	Interim Closing briefing.	√	√
Wednesday 22/01/2020 Bukit Kerayong 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
	09.00 - 11.30	Stakeholder interviews		\checkmark
	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	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		
Estate managers Mill engineer Supervisors, Staff & Clerks Mill local & foreign workers (process, workshop, etc.) Estate local & foreign workers (harvesters, sprayers, etc.) Local workers representatives Foreign workers representatives Gender committee representative	Masjid Nurul Hidayah Yung Sheng H/W Machinery		
Government Departments	NGO		
SK Bukit Kerayong SJK (T) Ladang Brafferton SJK (T) Jalan Akob	NA		



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			



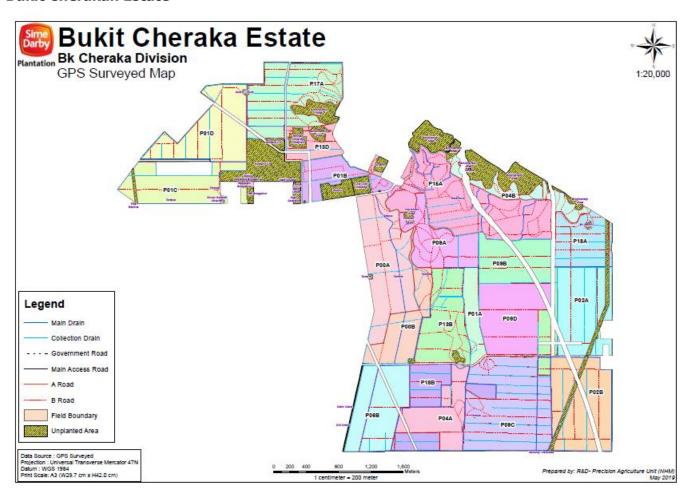
Appendix F: Location and Field Map





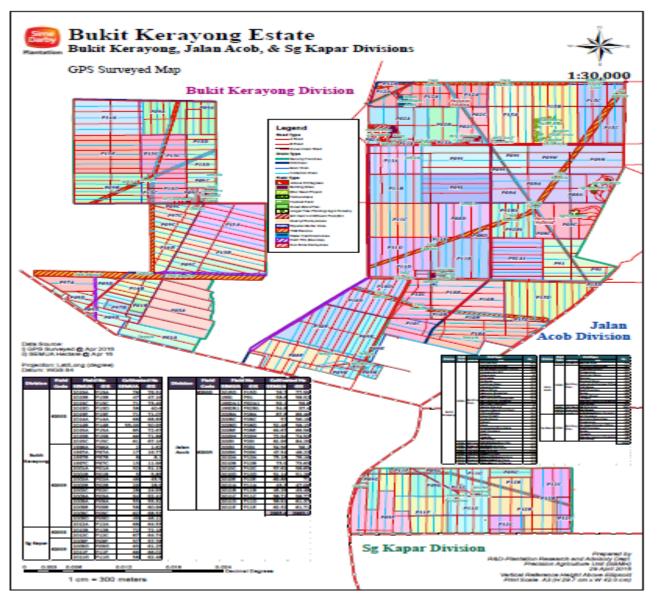
Field Map

Bukit Cherakah Estate





Ladang Bukit Kerayong





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