

**MALAYSIAN SUSTAINABLE PALM OIL
4th ANNUAL SURVEILLANCE ASSESSMENT (ASA4)
Public Summary Report**

TDM PLANTATION SDN BHD
Head Office: Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu Terengganu, Malaysia
Certification Unit: Kemaman Palm Oil Mill & Plantations: Tebak Estate, Pelantoh Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate and MAIDAM Estate
Date Final Report: 05/01/2022

Report prepared by:
Hafriazhar Mohd. Mokhtar (Lead Auditor)

Report Number: 3540062

Assessment Conducted by:
BSI Services Malaysia Sdn Bhd,
(DSM Accreditation Number: MSPO 09112018 CB 12)
Suite 29.01 Level 29 The Gardens North Tower,
Mid Valley City Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia
Tel +60392129638 Fax +60392129639
www.bsigroup.com

TABLE of CONTENTS	Page No
Section 1: Executive Summary	3
1.1 Organizational Information and Contact Person	3
1.2 Certification Information	3
1.3 Location of Certification Unit	4
1.4 Certified Area	4
1.5 Plantings & Cycle	5
1.6 Certified Tonnage of FFB	5
1.7 Uncertified Tonnage of FFB	5
1.8 Certified Tonnage	6
1.9 Actual Sold Volume (CPO)	6
1.10 Actual Sold Volume (PK)	6
Section 2: Assessment Process	7
2.1 BSI Assessment Team	8
2.2 Accompanying Persons	9
2.3 Assessment Plan	9
Section 3: Assessment Findings	12
3.1 Details of audit results	12
3.2 Details of Nonconformities and Opportunity for improvement	12
3.3 Status of Nonconformities Previously Identified and OFI	13
3.4 Summary of the Nonconformities and Status	16
3.5 Issues Raised by Stakeholders	17
Section 4: Assessment Conclusion and Recommendation	18
Appendix A: Summary of the findings by Principles and Criteria	19
Appendix B: List of Stakeholders Contacted	118
Appendix C: Smallholder Member Details	119
Appendix D: Location and Field Map (Location of Kemaman Palm Oil Mill & Estates)	120
Appendix E: List of Abbreviations	124

Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	TDM Plantation Sdn Bhd		
Mill/Estate	MPOB License No.		Expiry Date
	Kemaman Palm Oil Mill	500041904000	31/03/2022
	Pelantoh Estate	501374002000	31/03/2022
	Air Putih Estate	503558102000	31/07/2022
	Tebak Estate	501373102000	31/03/2022
	Jernih Estate	501868702000	31/10/2022
	Gajah Mati Estate	502036302000	31/08/2022
	MAIDAM Estate	503576002000	31/08/2022
Address	Level 3, Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin, 20100 Kuala Terengganu, Terengganu, Malaysia		
Certification Unit	Kemaman Palm Oil Mill & Plantations: Tebak Estate, Pelantoh Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate and MAIDAM Estate		
Contact Person Name	Mohd. Izwan Hafeez bin Che Azmi		
Website	www.tdmberhad.com.my	E-mail	izwan.tdmp@tdmberhad.com.my
Telephone	09-6204 800/ 019-9515 898	Facsimile	-

1.2 Certification Information			
Certificate Number	Mill: MSPO 678572 Estates: MSPO 686877		
Issue Date	15/12/2017	Expiry date	14/12/2022
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estates: Production of Sustainable Oil Palm Fruits		
Standard	MSPO 2530 Part 4: General principles for palm oil mills MSPO 2530 Part 3: General principles for oil palm plantations and organised smallholders		
Stage 1 Date	N/A (The certification unit is RSPO certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	15-17/08/2017		
Continuous Assessment Visit Date (CAV) 1	15-17/10/2018		
Continuous Assessment Visit Date (CAV) 2	03-06/09/2019		
Continuous Assessment Visit Date (CAV) 3	07-10/09/2020		
Continuous Assessment Visit Date (CAV) 4	25-28/10/2021		
Other Certifications			

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-IT206-795	ISCC EU	RINA	16/03/2022
RSPO 587626	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn. Bhd.	31/10/2023

1.3 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Kemaman Palm Oil Mill	KM 121, Jerangau - Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 24' 10.80" N	103° 14' 52.80" E
Pelantoh Estate	KM 121, Jerangau - Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 25' 19.23" N	103° 14' 59.64" E
Air Putih Estate	PT 2143-2147, Mukim Tebak & 1209-1213, Mukim Bandi, 24007 Kemaman, Terengganu, Malaysia	4° 15' 18.59" N	103° 12' 38.77" E
Tebak Estate	KM 121, Jerangau - Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 25' 48.61" N	103° 13' 35.40" E
Jernih Estate	KM 121, Jerangau - Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 26' 0.90" N	103° 12' 47.94" E
Gajah Mati Estate	Ladang Gajah Mati, 23200 Bukit Besi, Dungun, Terengganu, Malaysia	4° 41' 45.05" N	103° 12' 23.30" E
MAIDAM Estate	AM9, Bandar Al-Muktafi Billah Shah, 23400 Dungun, Terengganu, Malaysia	4° 37' 39.58" N	103° 12' 24.42" E

1.4 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pelantoh Estate	3,153.27	0.25	138.08	3,291.60	95.80
Air Putih Estate	4,042.70	187.70	121.58	4,351.98	92.89
Tebak Estate	2,922.33	30.46	340.84	3,293.63	88.73
Jernih Estate	2,822.07	65.46	248.07	3,135.60	90.00
Gajah Mati Estate	3,520.87	153.13	208.78	3,882.78	90.68
MAIDAM Estate	755.96	6.74	151.38	914.08	82.70
TOTAL	17,217.20	443.74	1,208.73	18,869.67	91.24

MSPO Public Summary Report
Revision 1 (Feb 2020)

1.5 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Pelantoh Estate	1,858.27	-	-	-	1,295.00	1,295.00	1,858.27
Air Putih Estate	82.49	2,435.24	-	1,336.21	188.76	3,960.21	82.49
Tebak Estate	419.60	419.53	-	901.67	1,181.53	2,502.73	419.60
Jernih Estate	663.00	307.93	1,280.77	570.37	-	2,159.07	663.00
Gajah Mati Estate	1,091.90	1,673.62	-	755.35	-	2,428.97	1,091.90
MAIDAM Estate	255.80	-	-	500.16	-	500.16	255.80
Total (ha)	4,371.06	4,836.32	1,280.77	4,063.76	2,665.29	12,846.14	4,371.06

1.6 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Oct 2020 - Sep 2021)	Actual (Sep 2020 - Sep 2021)	Forecast (Dec 2021 - Nov 2022)
Pelantoh Estate	18,120.00	23,864.33	13,610.00
Air Putih Estate	66,330.00	45,581.81	66,748.00
Tebak Estate	35,300.00	40,300.00	35,300.00
Jernih Estate	40,500.00	36,244.08	40,700.00
Gajah Mati Estate	24,320.00	34,409.73	38,500.00
MAIDAM Estate	3,060.00	1,744.48	2,180.00
Total	187,630.00	182,144.43	197,038.00
Note: -			

1.7 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Oct 2020 - Sep 2021)	Actual (Sep 2020 - Sep 2021)	Forecast (Dec 2021 - Nov 2022)
N/A	N/A	N/A	N/A
Total	N/A	N/A	N/A
Note: -			

MSPO Public Summary Report
Revision 1 (Feb 2020)

1.8 Certified Tonnage			
	Estimated (Oct 2020 - Sep 2021)	Actual (Sep 2020 - Sep 2021)	Forecast (Dec 2021 - Nov 2022)
	FFB	FFB	FFB
Mill Capacity: 60 MT/hr	187,630.00	182,144.43	197,038.00
SCC Model: SG/MB	CPO (OER: 20.50 %)	CPO (OER: 19.49 %)	CPO (OER: 20.50 %)
	38,464.15	35,499.95	40,392.79
	PK (KER: 5.00 %)	PK (KER: 4.51 %)	PK (KER: 5.00 %)
	9,381.50	8,214.71	9,851.90

1.9 Actual Sold Volume (CPO)					
CPO (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
35,499.95	-	-	30,000.00	5,000.00	35,000.00

1.10 Actual Sold Volume (PK)					
PK (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
8,214.71	-	-	8,000.00	-	8,000.00

Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 190 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 25-28/10/2021. The audit programme is included as Appendix 2.3. The approach to the audit was to treat the mill and estates as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The estates or smallholders sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

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

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

All the previous nonconformities are remains closed. The assessment findings from 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.

MSP0 Public Summary Report
Revision 1 (Feb 2020)

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

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)
Kemaman Palm Oil Mill	✓	✓	✓	✓	✓
Tebak Estate	✓	-	✓	-	✓
Pelantoh Estate	-	✓	-	✓	-
Jernih Estate	✓	-	✓	-	✓
Air Putih Estate	✓	-	✓	-	✓
Gajah Mati Estate	-	✓	-	✓	-
MAIDAM Estate	-	✓	-	✓	-

Tentative Date of Next Visit: August 1, 2022 - August 5, 2022

Total No. of Mandays: 15

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Hafriazhar Mohd Mokhtar (HMM)	Lead Auditor	He holds Bachelor of Engineering (Hons.) Chemical Engineering, UTM. Have almost 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before shifted into auditing. In short, his career began as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in plantation, Project Control Engineer (2008-2011) in mining and Auditor/Client Manager (2011-present) in certifications auditing. He has completed Social Auditing & SMETA Training (2021), ISO 45001 LA Training (2018), MSP0 LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011). During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, and safety and health land legal issue and traceability requirements. He is fluent in Bahasa Malaysia and English.
Muhammad Fadzli Masran (MFM)	Team Member	He holds Bachelor's 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

MSPO Public Summary Report
Revision 1 (Feb 2020)

		<p>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, endorsed RSPO Lead Auditor Course in July 2018, MSPO Lead Auditor Course in October 2018, endorsed RSPO Supply Chain Certification training course in January 2019, MSPO Supply Chain Certification System (SCCS) Auditor training Course (MPOCC Endorsed), CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course in April 2019, HCV and GIS Training in November 2019 and SMETA Requirements Training in April 2021. During this assessment, he assessed the aspects of Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements. He is fluent in Bahasa Malaysia and English.</p>
--	--	--

2.2 Accompanying Persons

No.	Name	Role
	N/A	

2.3 Assessment Plan

The assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	HMM	MM
Sunday 24/10/2021	PM	Audit team travel to Kemaman, Terengganu	✓	✓
Monday 25/10/2021	08:30 - 09:00	Opening Meeting (Kemaman Palm Oil Mill) <ul style="list-style-type: none"> • Presentation by TDM Kemaman • Presentation by BSI Lead Auditor - introduction of team member and assessment agenda • Confirmation of assessment scope and finalizing audit scope 	✓	✓
	09:00 - 12:30	Kemaman Palm Oil Mill Mill Assessment: 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.	✓	✓
	10:00 - 12:00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	✓	-
	12:30 - 13:30	Lunch break		
	13:30 - 16:30	Kemaman Palm Oil Mill Document Review (MS2530 Part 4 & Part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and	✓	✓

Date	Time	Subjects	HMM	MM
		employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices		
	16:30 - 17:00	Interim closing meeting	✓	✓
Tuesday 26/10/2021	08:30 - 12:30	Tebak Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓
	11:00 - 12:00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	✓	✓
	12:30 - 13:30	Lunch break	✓	✓
	13:30 - 16:30	Tebak Estate Document review (MS:2530 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	✓	✓
	16:30 - 17:00	Interim closing meeting	✓	✓
Wednesday 27/10/2021	08:30 - 12:30	Jernih Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓
	12:30 - 13:30	Lunch break	✓	✓
	13:30 - 16:30	Jernih Estate Document review (MS:2530 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	✓	✓
	16:30 - 17:00	Interim closing meeting	✓	✓
Thursday 28/10/2021	08:30 - 12:30	Air Putih Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓
	12:30 - 13:30	Lunch break	✓	✓
	13:30 - 16:30	Air Putih Estate	✓	✓

MSPO Public Summary Report
Revision 1 (Feb 2020)

Date	Time	Subjects	HMM	MM
		Document review (MS:2530 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		
	16:30 - 17:00	Closing meeting	✓	✓
Friday 29/10/2021	AM	Audit team travel back to KL	✓	✓

Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been 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
- MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

3.2 Details of Nonconformities and Opportunity for improvement

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

During this assessment, there is one (1) Minor nonconformity raised. Kemaman 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. Below is the summary of the non-conformity raised during this assessment.

Minor Nonconformities:		
Ref: 2121820-202110-N1	Area/Process: Jernih Estate	Clause: MSPO 2530 Part 3: 4.5.1.2
	Issue Date: 28/10/2021	Due Date: Next assessment
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:	The environmental aspect impact analysis was insufficiently covered all operations in the estates.	
Objective Evidence:	Noted during site visit at all estates it was sighted that the bio-compost fertilizer was dump at the roadside before applied in the field. Reviewed the EAI and EIE conducted, the bio-compost application was not captured in the assessment conducted.	
Corrections:	Flatten the bio-compost dump using backhoe on to frond stacking	
Root cause analysis:	Delay in flatten the bio-compost dump due to unavailability of machinery (backhoe)	
Corrective Actions:	<ul style="list-style-type: none"> - Complete the application (in-field) by 3rd quarter before raining season - The application of bio-compost should begin after 3rd row from the water source (river) to avoid leaching 	
Assessment Conclusion:	Corrective action plan (CAP) has been accepted. Evidence of CAP effectiveness to be verified in next coming audit.	

Opportunity For Improvement		
Ref: N/A	Area/Process: N/A	Clause: N/A

MSPO Public Summary Report
Revision 1 (Feb 2020)

Objective Evidence:	N/A
---------------------	-----

Noteworthy Positive Comments	
1	Good cooperation among the team.
2	Good document retrieval.
3	Positive feedbacks from interviewed external stakeholders.

3.3 Status of Nonconformities Previously Identified and OFI

Minor Nonconformities:		
Ref: 1955968-202009-N1	Area/Process: Pelantoh Estate	Clause: MSPO 2530 Part 3: 4.4.5.9
	Issue Date: 10/09/2020	Closed Date: 25/10/2021
Requirements:	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	
Statement of Nonconformity:	Wages payment documented on the pay slips was not in line with check roll book and legal regulations (Employment Act 1955)	
Objective Evidence:	Wages payment for one (1) worker (ID: PT17011266) under harvesting gang 05 in July 2020 was not tally with the record in check roll book. Rate per bunch is RM 0.74 and however he was paid for RM 0.25 per bunch.	
Corrections:	Estate management has recalculated the wages for the harvesting Gang 05 at the actual rate for work on Friday and has repaid their salary balance on 20/09/2020.	
Root cause analysis:	The wages payment error is for work on Friday by Gang 05 where the salary rate per bunch used to calculate the salary has been miscalculated by field assistant.	
Corrective Actions:	All check roll book prepared by field assistant (harvesting & maintenance gang) must be cross checked by assistant manager.	
Assessment Conclusion:	As this is Minor Non-Conformity, the effective implementation of the corrective action plan will be assessed during next assessment.	
Verification Statement	<p>Wages and overtime payment documented found consistent with legal regulations and collective agreements as per sample sighted i.e. National Minimum Wages Order 2020 in line with MAPA Circular No. 56/2021; Date: 23/8/2021; Oil Palm MAPA/NUPW on the Wages of Harvesters, Harvesting Kanganies, Loaders and "Other Loaders on Oil Palm Estates, 2019; Wage Rate September 2021 & Palm Oil Mill MAPA/NUPW Palm Oil Mill Employees Agreement, 2019; Wage Rates - September 2021. Sighted payslips for following Tebak Estate sampled workers:</p> <ul style="list-style-type: none"> - Employee # TB00079; Post: General Worker - Field; Female - Employee # TB00204; Post: Creche Ayah; Female - Employee # TB1200654; Post: General Worker - Field; Female - Employee # TB2001244; Post: General Worker - Field; Male - Employee # TB2101310; Post: General Worker - Field; Male - Employee # TB1801090; Post: General Worker - Field; Male - Employee # TB1801142; Post: Piece Rate Worker; Male - Employee # TB1400811; Post: General Worker - Field; Male 	

MSPO Public Summary Report
Revision 1 (Feb 2020)

	<ul style="list-style-type: none"> - Employee # TB1500937; Post: Piece Rate Worker; Male - Employee # TB2001230; Post: Harvester; Male <p>Jernih Estate sampled workers:</p> <ul style="list-style-type: none"> - Employee # JN00033; Post: General Worker; Female - Employee # JN0900306; Post: Sprayer; Male - Employee # JN1300572; Post: Harvester; Male - Employee # JN1400634; Post: Tractor Driver; Male - Employee # JN1400656; Post: Harvester; Male - Employee # JN1600749; Post: General Worker; Male - Employee # JN1800818; Post: Sprayer; Male - Employee # JN1800828; Post: Harvester; Male - Employee # JN1800850; Post: General Worker; Male - Employee # JN1900896; Post: General Worker; Female <p>Air Putih Estate sampled workers:</p> <ul style="list-style-type: none"> - Employee # AP2101505; Post: Lorry Driver; Male - Employee # AP2001458; Post: Harvester; Male - Employee # AP2101502; Post: Nursery Worker; Female - Employee # AP2101525; Post: Sprayer; Male - Employee # AP900517; Post: Harvester; Male - Employee # AP1200714; Post: Mandore; Male - Employee # AP1200721; Post: General Worker; Male - Employee # AP1501127; Post: Tractor Driver; Male - Employee # AP1801266; Post: Loader; Male - Employee # AP1501103; Post: Harvester; Male <p>Evidence of CAP verified during ASA 4 visit found to be effective to resolve issue. Hence Minor NC closed on 25/10/2021.</p>
--	--

Minor Nonconformities:		
Ref: 1955968-202009-N2	Area/Process: Gajah Mati Estate	Clause: MSPO 2530 Part 3: 4.5.3.3
	Issue Date: 10/09/2020	Closed Date: 25/10/2021
Requirements:	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.	
Statement of Nonconformity:	Monitoring of Scheduled Waste (clinical waste) generated were not effectively implemented.	
Objective Evidence:	<p>Last disposal of SW 404 clinical waste at Gajah Mati Estate was done on 21/1/2020 as per C/N no. 0331922. As per inventory records, first generation of SW 404 after last disposal recorded on 29/1/2020. The evidence shows that the SW were kept for more than 180 days without notification and approval from DOE.</p> <p>This shows that monitoring of clinical waste generated were not effectively implemented. Thus, NC were raised.</p>	

MSPO Public Summary Report
Revision 1 (Feb 2020)

Corrections:	21/9/2020, Clinco Waste Management Sdn Bhd has been collecting clinical waste
Root cause analysis:	<p>The inventory records already implemented based on daily basis, but not in proper monitoring and recording.</p> <p>The effect Pandemic COVID-19 and the implement of a Movement Control Order (MCO) is delayed of schedule for disposal of clinical waste by contactor.</p> <p>Also during MCO, give impact to our planning to conduct refreshment training and briefing to our HA regarding to awareness of schedule waste (clinical waste).</p>
Corrective Actions:	<p>Monthly inventory via Electronic Scheduled Waste Information System (ESWIS).</p> <p>Monitor schedule of clinical disposal in guideline date form.</p> <p>Training for person in charge regarding to Scheduled Waste (clinical waste). The document will be recorded include attendant list, input and photo.</p>
Assessment Conclusion:	As this is Minor Non-Conformity, the effective implementation of the corrective action plan will be assessed during next assessment.
Verification Statement	<p>The estate maintains the inventory records of the Scheduled Waste generated and reported to DOE through ESWISS. Reviewed the Fifth Scheduled: Inventory of Scheduled Waste for the month of July, August, September and October 2021.</p> <p>Inventory for all scheduled waste generated were recorded and reported to DOE through E-SWISS. Reviewed the sampled scheduled waste disposal records:</p> <p><u>Tebak Estate</u></p> <ol style="list-style-type: none"> 1. 10/10/2021, SW 409, C/N no. 2021102216OUT2N9 2. 20/09/2021, SW 404, C/N no. 2021092010TFJ2C9 <p><u>Jernih Estate</u></p> <ol style="list-style-type: none"> 1. 28/08/2021, SW 305, C/N no. 2021082814WAPUD6 2. 28/08/2021, SW 409, C/N no. 202108281461STYH 3. 29/08/2021, SW 410, C/N no. 2021082915ZJ2DTI <p><u>Air Putih Estate</u></p> <ol style="list-style-type: none"> 1. 19/09/2021, SW 404, CN no. 202109191108P4FS 2. 23/03/2021, SW 404, CN no. 2021032314LTP0P1W 3. 07/09/2021, SW 410, CN. No. 2021090709YTNOZE 4. 07/09/2021, SW 409, CN. No. 2021090709NPH8CJ 5. 07/09/2021, SW 305, CN. No. 20210907092LF4DO <p>Evidence of CAP verified during ASA 4 visit found to be effective to resolve issue. Hence Minor NC closed on 25/10/2021.</p>

Opportunity For Improvement			
Ref:	1955968-202009-I1	Clause:	MSPO 2530 Part 3: 4.4.5.11
Area/Process:	Estate		
Objective Evidence:	<p>Compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) has yet to be further improved on:</p> <ol style="list-style-type: none"> i) Consistent monitoring of weekly line site inspection ii) VMO task and frequency of visit to be clearly assigned as per section 19(3) of Workers' Minimum Standards Housing and Amenities Act 1990 		

MSPO Public Summary Report
Revision 1 (Feb 2020)

	iii) The new Employees Minimum Standards of Housing, Accommodations and Amenities (Accommodation and Centralized Accommodation) Regulations 2020.
Verification Statement:	<p>On-site living quarters are provided and visit to the housing area/line site showed quarters are decently habitable and equipped with basic amenities of free electricity and water supply including other facilities such as mosque, community hall, sundry store, canteen, children’s crèche and football field.</p> <p>Common clinic shared between Tebak, Jernih and Pelantoh Estate and Kemaman Mill located in Tebak Estate operated by 2 Estate Hospital Assistants (EHA). Air Putih Estate has own clinic and EHA. Sighted the latest housing inspection records shown the following:</p> <ul style="list-style-type: none"> - Latest VMO visit for Air Putih Estate dated 6/10/2021 by Dr. Noraslinda Abu Bakar from Klinik Bestari Dungun. - Latest housing inspection by HA conducted on 25/10/2021 for workers line site main division, creche, chemical store, workshop & hall. - Clinical waste collected by Clinco Waste Management Sdn. Bhd. as per agreement for service (Incineration and Disposal of Clinical Wastes) dated 24/6/2019 between Edgenta Mediserve Sdn. Bhd. and Clinco Waste Management Sdn. Bhd.

3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1512739-201708-M1	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-M2	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-M3	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-M4	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-M5	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-M6	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-M7	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-N1	Minor	17/8/2017	Closed on 15/10/2018
1512739-201708-N2	Minor	17/8/2017	Closed on 15/10/2018
1697065-201810-M1	Major	17/10/2018	Closed on 3/1/2019
1697065-201810-M2	Major	17/10/2018	Closed on 3/1/2019
1820365-201908-M1	Major	06/9/2019	Closed on 5/11/2019
1820365-201908-M2	Major	06/9/2019	Closed on 5/11/2019
1820365-201908-M3	Major	06/9/2019	Closed on 5/11/2019
1820365-201908-M4	Major	06/9/2019	Closed on 5/11/2019
1820365-201908-N1	Minor	6/9/2019	Closed on 10/9/2020
1955968-202009-N1	Minor	10/09/2020	Closed on 25/10/2021

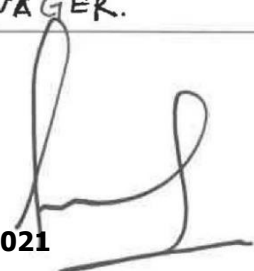
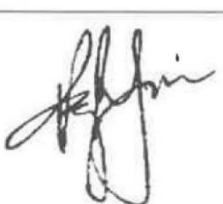
MSP0 Public Summary Report
Revision 1 (Feb 2020)

1955968-202009-N2	Minor	10/09/2020	Closed on 25/10/2021
2121820-202110-N1	Minor	28/10/2021	Open

3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Feedbacks: MPKK Sungai Mas There issue on the improvement of the staff quarter road to TAR road since the quarter area is also recognized as the registered village with the state government.</p> <p>Management Responses: The quarters were belonged to the company and although the village is registered with the state government, it was under the estate's land title. Most of villagers of Sungai Mas were the former workers in estates and management has let them stay for free although no more working with TDM Plantation Sdn Bhd. According to the road upgrade works, management will prioritize existing workers housing area continuous improvement.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Issues: Government Nursery Teacher (Tabika Kemas Sungai Mas) Company management from estates and mill as well as HQ communicates well and willing to help if any. Current requirement involved grass cutting for open area in front of nursery.</p> <p>Management Responses: Grass cutting scheduled later to be conducted immediately.</p> <p>Audit Team Findings: Action verified to be taken immediately. No further issue.</p>
3	<p>Issues: NUPW representatives & Gender Committee So far, there is no complaint or grievance except for the housing maintenances. Workers didn't have any issue regarding salary, freedom to have union and going out, express concern, etc. No discrimination is practised within the complex.</p> <p>Management Responses: Positive feedbacks noted.</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Feedbacks: Vendors/Contractors (TDM Kemaman Employee Co-operative Manager) No more issue with late payment since last audit. All invoices cleared upon agreed time within 21 - 30 days.</p> <p>Management Responses: No more financial crisis since the FFB price are on the uptrend since last audit. Findings raised during RSPO audit last year has been addressed as well.</p> <p>Audit Team Findings: No further issue.</p>

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill & Supply Base Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill & Supply Base Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: HJ. HASSAN B. OSMAN	Name: Hafriazhar Bin Mohd. Mokhtar
Company name: KEMAMAN PALM OIL MILL	Company name: BSI Services Malaysia Sdn. Bhd.
Title: MILL MANAGER.	Title: Lead Auditor
Signature: 	Signature: 
Date: 27/12/2021	Date: 27/12/2021

Appendix A: Summary of the findings by Principles and Criteria

MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders

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	A policy for the implementation of MSPO shall be established. - Major compliance -	On group level, policy for the implementation of MSPO established as TDM Berhad Sustainability Policy; approved by the BOD and signed by TDM Plantation Sdn. Bhd. CEO on 1/4/2021. Briefing of the policies were provided to the workers as per records of internal training report Briefing of Company Policies including MSPO Policy; Date 25/8/2021 for Air Putih Estate workers by all employees. The policies were displayed at the notice board outside the office.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The policy emphasized the commitment by management in all its management aspect through: <ul style="list-style-type: none"> - Commitment and responsible management - Transparency - Compliance towards legal requirements - Responsibility in social, health, safety and employment condition - Environmental, natural resources, biodiversity and ecosystem - Best management practices - Responsible new development The policy also included on the commitment to implement continual improvement through gainful utilization of resources among human,	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		process and technology to ensure sustainability production of palm products.	
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 -	Internal audit was planned as per 2021 MSP0/RSP0 Compliance Audit Plan and latest conducted on 22/8/2021 – 1/9/2021. Records of internal audit report and findings shown the internal audit able to determine the strong and weak points and potential area for further improvement.	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 -	Internal audit procedure established as TDM Plantation Sdn. Bhd. STPOM MSP0 Internal Audit Standard Operating Procedure; Date: 1/8/2017; Edition: TDMP/01; Rev.: TDMP-01/2017. Identified findings recorded in Sustainability Audit Non-Compliance Findings and Recommendations Report for the internal audit latest conducted on 22/8/2021 – 1/9/2021. Sighted the Corrective Action Report on Non-compliance Findings on the analysis of nonconformity raised.	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Report made available for review in the management review meeting and recorded in the minutes under “ <i>Pembentangan Laporan Audit Dalam Kelestarian MSPO 2021</i> ”.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	Previous management review was conducted on 12/9/2021 as per Minutes of Meeting Marketing & Operation Meeting (MOM) 09/2021 records. Review meeting was chaired by the CEO and attended by plantation controllers, all operating unit managers as well as other departmental managers including sustainability, marketing, and finance. Latest review meeting was conducted on 12/10/2021 as per	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance										
		notification email of 10 th Marketing & Operation Meeting Year 2021 (MOM – 10/2021). Sighted the agenda to be review as following: <ul style="list-style-type: none"> - Confirmation of 9th Meeting (09/2021) held on 12/9/2021 - Matters arising - Marketing report as at September 2021 by TDM Trading - Palm Oil Mill Performance as at September 2021 - Bio-Organic Fertilizer (BOF) Plant Performances as at Sep 2021 - Stevia Delivery Report - Management review on RSPO/MSP0/CoP on Supply Chain – Sustainability Matters - Any other matters 											
Criterion 4.1.4 – Continual Improvement													
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	Based on the Sustainability Committee TDM South Zone Brief Report of Sustainability and Challenges (TDM South Zone) June 2021, the estates established a Continuous Improvement Plan FY 2021/2022 dated June 2021 which based on consideration of main social and environmental impact as well as opportunities for company. Amongst all, 2021 on-going and completed plan include the following samples: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Category</th> <th>Issue</th> <th>Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Welfare (Social)</td> <td>Location of workers housing too close to effluent ponds</td> <td>Relocate to safer and better location</td> </tr> <tr> <td>Insufficient workers housing</td> <td>Additional housing construction</td> </tr> <tr> <td>Bad road surface</td> <td>Construction of Pro-base road</td> </tr> </tbody> </table>	Category	Issue	Plan	Welfare (Social)	Location of workers housing too close to effluent ponds	Relocate to safer and better location	Insufficient workers housing	Additional housing construction	Bad road surface	Construction of Pro-base road	Complied
Category	Issue	Plan											
Welfare (Social)	Location of workers housing too close to effluent ponds	Relocate to safer and better location											
	Insufficient workers housing	Additional housing construction											
	Bad road surface	Construction of Pro-base road											

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings			Compliance
			Insufficient drinking water resources	Install new water filtration system in workers rest room	
			Dirty drinking water in mill	Install new water filtration system	
		Operation (Environmental)	High water usage at ramp for cleaning	Front-end upgrading works	
			Cleanliness problem at front end area	Front-end upgrading works	
			Overflow of effluent during heavy rain	Digging of 2 new ponds and rebuild of flatbeds	
			Integrated Pest Management	Planting of beneficial plant and barn owl box	
			Empty chemical container	Triple rinsing program	
			Domestic waste – plastics	Recycle program	
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	The estate has optimized the use of mechanized operations to reduce pollutions. For example, existing crop evacuation system using mechanized buffalo (MB), Mini Tractor Grabber (MTG) and bin system are still in used. Verified during assessment, there was no new information and techniques or new industry standards and technology observed.			Complied
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.	The action plan was established as Continuous Improvement Plan for FY 2021/2022 based on the Sustainability Committee TDM South			Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Zone Brief Report of Sustainability and Challenges (TDM South Zone) June 2021.	
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSP0 requirements			
4.2.1.1	<p>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.</p> <p>- Major compliance -</p>	<p>Records of communication with stakeholders were sighted. Most of them were related to request for assistance such as donation for sports day, Raya celebration, transportation, and netball pole. The management has responded and provided with assistance.</p> <p>The mill and estates have developed the stakeholder list which included all relevant stakeholders such as local communities, government authorities, contractors and suppliers and etc. Pelantoh Estate Stakeholder meeting 19/8/2020; 5/10/2021 – TDM Plantation Sdn. Bhd. Stakeholder Feedbacks Survey – online (email) positive feedback received from:</p> <ul style="list-style-type: none"> - Kejuruteraan Prisma - Chong Trading - Cahaya Nilam Enterprise - Eralab KT Sdn. Bhd. <p>Issues raised during the stakeholders was explained in the meeting and unresolved issue has incorporated into the Social Action Plan to monitor.</p>	Complied
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental	There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	<p>or social outcomes.</p> <p>- Major compliance -</p>	<p>where disclosure of information would result in negative environmental or social outcomes.</p> <p>Documents that publicly available are such as social and environment impact assessment, action plan, meeting minutes and audit reports.</p> <p>Besides, policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p> <p>As per Memorandum by Group Chief Executive Officer; Ref. # TDM/CC/01; Date: 8/4/2018 from Corporate Communication Department to Heads of Subsidiaries, Heads of Department and All Staff of TDM Berhad Group on Sustainability Policies for the new policies approved by the Board on 27/10/201 as following:</p> <ul style="list-style-type: none"> - Sustainability Policy - Environment & Biodiversity Policy - Social & Humanity Policy - Occupational safety & health Policy - Gender & Diversity Policy 	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>Procedures available as per Stakeholder Social Issue (Requests/Complaints/Grievances) Handling Flow-Chart with use of Communication form; Rev. 1 TDMP 2017 between stakeholder and TDMP. There's also procedure of external communication for handling of specific external stakeholders.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	All Estate Managers were appointed as the management officials as per Letter “ <i>Perlantikan Sebagai Wakil Syarikat Bagi Mengendalikan Isu Sosial Dengan Pihak Luar Di Peringkat Ladang/Kilang</i> ” from Group Human Resource Manager; ref. # TDMP/HR/PSN-GEN(MSPO/RSPO); dated 18/9/2017. Appointed management representative for Kemaman POM, Tebak Estate, Air Putih Estate, Jernih Estate is Estate Manager as per letter ref. # TDMP/HR-GEN(MSPO/RSPO); Date: 17/10/2021 from Head of Human Resource TDM Plantation.	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. - Major compliance -	Stakeholder list was developed where all the affected stakeholders were included into the list such as government authorities, local communities, contractors and supplier, neighboring schools and etc. for the sampled 3 estates. Sampled records maintained as following: <ul style="list-style-type: none"> - Register of stakeholders 2021 list - External communications letters received - Communication of workers and contractors’ form List available as per list of stakeholders Air Putih Estate 2021. Consultation done via online survey form by Air Putih Estate through email dated 7/10/2021 with stakeholders such as local communities, managers from other estates, workers’ representatives, school representatives and etc. Issues raised during the stakeholders was explained in the online survey and unresolved issue has incorporated into the Social Action Plan to monitor. No negative feedback received.	Complied
Criterion 4.2.3 – Traceability			

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
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). - Major compliance -	SOP on the traceability of the FFB has established and describe in the TDM Plantation Sdn. Bhd. Standard Operating Procedure dated 21/8/2017. Assistant Manager was responsible on the traceability while the records were kept by harvesting supervisors.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Estate supervisor will verify the records related to the traceability of FFB. Sighted the harvesting record for the month of July, August and September 2019, as of 6/9/2019 for all estates.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The management identified all field and harvesting supervisors to be responsible to implement and maintain the traceability system.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Records of sales and delivery/transportation of FFB were maintained and updated on daily basis as part of estate production report. Sample estate FFB delivery to mill records sighted as following: <ul style="list-style-type: none"> - Jernih Estate FFB Despatch Note # 33861; Mill weighbridge docket # P0249837; Date: 28/8/2019; Lorry # TAF106; Net weight: 6,840 kg - Jernih Estate FFB Despatch Note # 33207; Mill weighbridge docket # P0246494; Date: 14/7/2019; Lorry # TBH3495; Net weight: 5,810 kg - Air Putih Estate FFB Despatch Note # 13565; Mill weighbridge docket # P0245643; Date: 27/6/2019; Lorry # TAK4371; Net weight: 9,520 kg - Jernih Estate FFB Despatch Note # 15410; Mill weighbridge docket # P0249992; Date: 30/8/2019; Lorry # TAQ6682; Net weight: 8,670 kg 	Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Compliance to each applicable law and regulation is monitored by the operating units. Reviewed the sampled evidence of compliancy to the regulation as follows:</p> <p><u>Tebak Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License no. 501373102000, valid till 31/03/2022 2. Certificate of fitness (CF) no. for air receiver no. PMT-TG/21 27468 valid till 11/01/2023 3. Diesel permit no. T 001782 valid till 115/06/2022 <p><u>Jernih Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License no. 501868702000, valid till 31/10/2021. Renewal has been done on 14/09/2021 as per official receipt no. Ref2-00084752 2. Certificate of fitness (CF) no. for air receiver no. PMT-TG/20 21689 valid till 01/12/2021 3. Diesel permit no. T 001817 valid till 106/09/2024 4. Petrol permit no. T000481 valid till 13/07/2022 5. Electrical fencing approval letter no. OTKB202000003PGR dated 24/12/2020 and OTKB202000015PGR dated 23/12/2020 6. Permit to purchase highly toxic/limited pesticides, Acephate no. TRG/2021/ACP/004(GL) dated 08/03/2021 	<p>Complied</p>

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Air Putih Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License no. 503322802000, valid till 31/07/2022. 2. MPOB License no. 503558102000, valid till 31/07/2022. 3. MPOB Nursery License no. 560687011000, valid till 30/04/2022 4. Certificate of fitness (CF) no. for air receiver no. PMT-TG/21 23734 valid till 13/04/2022 5. Diesel permit no. T 001705 valid till 14/10/2021. The application for renewal was done on 06/09/2021 as per BLESS no. BL220210336680. 	
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established SOP to identify, access, tracking changes and monitoring the compliance with legal requirements that were applicable to them documented in Standard Operating Procedure: Legal and Other Requirements. Refer document no. TDM/KPOM/01, rev. 01 dated 01/05/2011. The legal register shall be evaluated at least once a year.</p> <p>The estates listed all applicable legal and other requirements in Legal Register 2021.</p>	Complied
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The estates has listed all applicable legal and other requirements in Legal Register 2021. Latest review and update was conducted 20/09/2021. Among the latest update to the applicable law and other regulation as follows:</p> <ol style="list-style-type: none"> 1. Movement Control Order 2020 for COVID-19 2. Min wages order 2020 rev 15/01/2020 3. Workers Min Std Housing Amenities (Amendment) Act 1990 revised on 01/6/2020 4. FMA 1089 (Noise exposure) Revocation 2019 	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>The Legal and Secretarial Department will track any changes to the applicable legal and other requirements and update the Sustainability Team. The Sustainability Team will communicate the new update with operating units through memorandum, letter or emails. The estates appointed the Assistant Manager/Compliance Executive as person responsible for compliance legal and other requirement as per appointment letter dated signed by the Estate Manager.</p> <p>Refer appointment letter no. TDMP/LRR/001/2021 (Kemaman POM), TDMP/LTB/2021 (Tebak Estate), LJJ.RSPO/MSP0/2021 (Jernih Estate) and TDMP/LRR/001/2021 (Air Putih Estate).</p>	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>Estate activities do not diminish the land use rights of other users. Ownership documents sighted i.e. State Title; Ownership # 6521; Lot #7663; Area: 58.7685 ha; District: Kuala Terengganu; Mukim Belara; Date: 18/11/1976; Owner: Perbadanan Memajukan Iktisad Negeri Terengganu; Leasing to: Kumpulan Ladang-ladang Terengganu Sdn. Bhd.; Period: 1/1/1973 – 31/12/2017. Sighted too the Management Agreement as following:</p> <ul style="list-style-type: none"> - Between Kumpulan Ladang-ladang Terengganu Sdn. Bhd. and TDM Plantation Sdn. Bhd. dated 20/7/2016 - Between TDM Plantation Sdn. Bhd. and TDM Berhad dated 20/7/2016 - Between Kumpulan Ladang-ladang Terengganu Sdn. Bhd. and TDM Berhad dated 1/9/2012 	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		It was noted that the agreements were under review for extension depends on negotiated terms and conditions between both parties.	
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p>- Major compliance -</p>	<p>The estates are on government lease land and they hold copies of Land Titles. Original land title document is kept at head office while a copy of it is available at estate’s office. At least four of the estates within Kemaman POM complex mainly Tebak, Jernih, Air Putih and Pelantoh shared their land titles with demarcation only with individual estate’s field map among each other. These mainly for estates located within mukim Tebak and Bandi which is also the area for mill location.</p> <p>Kemaman POM does not have a copy of land title by itself but is located within Pelantoh Estate that has legal ownership of the land and is an Operating Unit of TDM Plantation Sdn Bhd.</p> <p>Tebak Estate total land title 6 as per summary of Land Title sighted as following:</p> <ul style="list-style-type: none"> - Title # 18274; Lot # 2514; Area 218.2 ha; District: Kemaman; Sub-District: Mukim Tebak - Title # HSD 2872; PT # PT 402; Area 198.191 ha; District: Kemaman; Sub-District: Mukim Tebak - Title # HSD 1779; PT # PT 1666; Area 3,861.1 ha; District: Kemaman; Sub-District: Mukim Tebak <p>Jernih Estate total land title 13 as per summary of Land Title sighted as following:</p> <ul style="list-style-type: none"> - Title # 9199; Lot # 29; Area 3,439.831 ha; District: Kemaman; Sub-District: Mukim Tebak <p>Air Putih Estate total 14 land titles:</p>	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Title # HSD 9194; Lot # PT 198/65; Area 129.4995 ha; District: Kemaman; Sub-District: Mukim Bandi - Title # HSD 9195; Lot # PT 198/65; Area 984.1963 ha; District: Kemaman; Sub-District: Mukim Bandi - Title # HSD 9196; PT # PT 198/65; Area 414.3984 ha; District: Kemaman; Sub-District: Mukim Tebak 	
4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>The estate boundary is well maintained with the construction of boundary pegs. Sighted available marker pole at Tebak Estate Field 17A/18A, Elephant Trenching/Electric Fence near Hutan Ulu Paka - Rasah, and at Jernih Estate, Field 04A at Conservation Area >25°.</p> <p>There are more than 10 boundary pegs, painted with red and white stripe installed at the boundary of the estate and are evidence in Layout Plan with details GPS Coordinate.</p>	Complied
4.3.2.4	<p>Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC).</p> <p>- Minor compliance -</p>	<p>There is no land dispute in TDM Kemaman complex at the time of audit. The land belongs to TDM and land ownership documents verified.</p>	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	<p>Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.</p> <p>- Major compliance -</p>	<p>No lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.</p>	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - Minor compliance -	No lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Not Applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	No lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Not Applicable
4.4 Principle 4: Social responsibility, health, safety and employment condition			
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 -	Implementation was as per TDM Plantation Sdn. Bhd. Social Impact Assessment (SIA) Kompleks Kemaman; A report prepared by SRA Consultancy, Senawang, Negeri Sembilan for TDM dated November 2011 was made available during audit. Based on the assessment, action plan was established on annual basis as per sighted SIA Action Plan as at 2020/2021; Date review: 1/3/2021. Sighted area of concerns including housing and infrastructure with social impact identified were poor facilities and infrastructure, housing not complying with legal requirement, poor waste dumpsite and etc. Progress of improvement plan shown most of the areas of concerns have been completed such as issues on poor drainage and septic tank system at line site while some were done continuously on annual basis for improvement plan such as construction of new workers quarters.	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	A system for dealing with complaints and grievances were established and documented as a Flowchart on Handling Social Issue and Complaint/ Grievance Procedure. Any issue raised by stakeholders will be discuss within 2 weeks for the first meeting and issues to be resolved within 28 working days.	Complied
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 -	Based on the records of Complaint Logbooks in visited estates, it was verified that all complaints and action able to be resolved in effective, timely and appropriate manner. Verification of resolution signatures by Officer, Assistant Manager and Manager were sighted.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	Complaint Logbook for Linesite Repair and Complaint/ Request form was established and implemented. No external stakeholders were recorded related on complaint and grievances.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Interview with internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and they were briefed by the management during stakeholder meeting.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	The complaint logbook/ complaint files that recorded complaints and solutions since at least January 2014 was maintained available to affected stakeholders upon request.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.4.3.1	<p>Growers should contribute to local development in consultation with the local communities.</p> <p>- Minor compliance -</p>	<p>Contributions were made as part of Continuous Improvement Plan FY2020/2021 in all estates. Records for Air Putih Estate contribution sighted as per sample as following:</p> <ul style="list-style-type: none"> - Provision of estate lorry use for Kampung Teladas road paving works; Date: 6/1/2021 - Provision of estate van use for SK Ayer Putih school children program transport; Date: 24/3/2021 - Foreign workers vaccination programs for foreign workers at Unisza Kuala Terengganu; Date: 2/9/2021 <p>Other contributions also sighted as per sample as following:</p> <ul style="list-style-type: none"> - Kemaman POM: Contribution of food basket to all employees during EMCO; 5/8/2021 - Pelantoh Estate: Contribution of Grass Cutting Tractor for SK Padang Kubu football field grass cutting; 23/5/2021 - Tebak Estate: Contribution to joint program of malaria & filariasis control and prevention through mass blood survey; 27/9/2021 	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established Safety and Health Policy dated 01/04/2021 signed by the CEO. In the policy stated the company's commitment to:</p> <ul style="list-style-type: none"> i) Provide continuous training and development in order to increase awareness among the employees ii) Instilling a culture of safety and health among employees iii) Complied with safety and health legal requirements, guidelines and best practices 	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance
	<p>iv) Made safety and health factors as main element to develop and run the company operations</p> <p>v) Improve the safety and health management base on Occupational Safety and Health Act 1994 and Factory and Machinery Act 1967.</p> <p>The estates established OSH Plan FY 2021. The plan cover on OSH legal compliance, emergency response plan, OSH management system, risk management and safety committee. Sighted the implementation as follows:</p> <p>Reviewed the implementation of the management plan as follows:</p> <p><u>Tebak Estate</u></p> <ol style="list-style-type: none"> 1. Latest Chemical Hazard Risk Assessment was conducted on 01/06/2021 by OHD with reg. no. JKPP HQ/10/ASS/00/8 as per report no. JKPP HQ/10/ASS/00/8 2021/069. 2. The estate conducted medical surveillance as per recommendation by CHRA on annually basis. Latest medical surveillance was conducted 01/02/2021. Total of 23 workers were send for surveillance and found fit to work as chemical handlers. 3. The estate conducted medical screening for sprayers on monthly basis. Reviewed the screening reports dated 06/10/2021, 15/09/2021, 29/08/2021 and 18/07/2021. 4. Noise Risk Assessment was conducted on 18/10/2021 by assessor with reg. no. HQ/06/PEB/00/69 as per report no. R-NE-20-TDM LTK-16 dated 18/11/2020. Based on the report, audiometric was recommended to be conducted on annually basis. Latest audiometric was conducted on 17/10/2021. The report has yet to be received by the estate. 	

Criterion / Indicator	Assessment Findings	Compliance
	<p>5. The estate monitor the first aid box on monthly basis. Reviewed the monitoring records dated 12/09/2021, 30/08/2021, 25/07/2021 and 23/06/2021.</p> <p><u>Jernih Estate</u></p> <ol style="list-style-type: none"> 1. The estate sends the workers involved in chemical handling for medical surveillance on annually basis. Latest medical surveillance was conducted on 23 – 25/08/2021. 20 workers were sent for surveillance and found fit to work as chemical handlers 2. Annual audiometric test was conducted on 05 – 12/09/2021 for 20 workers as per recommendation in the Noise Risk Assessment Report no. R-NE-20-TDM LJH-18 dated 24/11/2020. 7 workers were found with hearing impairment and JKPP 7 was submitted on 09/10/2021. 3. The estate conducted medical screening on monthly basis. Reviewed the records conducted on 22/09/2021, 18/08/2021 and 14/07/2021. <p><u>Air Putih Estate</u></p> <ol style="list-style-type: none"> 1. Latest medical surveillance for workers involve with chemical application was conducted on 23 – 24/05/2021. 17 workers was send for surveillance and found fit to work as chemical handlers. 2. The estate monitors the first aid box on monthly basis. Reviewed the monitoring records dated 08/08/2021, 15/09/2021 and 13/10/2021 	

Criterion / Indicator		Assessment Findings	Compliance
		3. The estate conducted medical screening on monthly basis. Reviewed the records conducted on 18/10/2021, 21/09/2021 and 26/05/2021	
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as 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 	<ul style="list-style-type: none"> a) TDM Plantation Sdn Bhd has established Safety and Health Policy dated 01/04/2021 signed by the CEO. The policy was communicated to all workers through morning briefing, training and displayed on notice board. b) TDM Plantation Sdn Bhd has established the SOP for risk assessment to identify H&S issue documented in the Standard Operating Procedure (HIRARC) edition TDMP/01, rev. no. TDMP-02/2018 dated 22/10/2018. The risk assessment process has been describe in the SOP accordingly. As per SOP, HIRARC review to be conducted as follows: <ol style="list-style-type: none"> 1. At least once a year 2. Immediately whenever there is an accident, near miss or dangerous occurrence 3. When there is changes in the work method 4. When new machines and technology are introduced 5. When there is new activity, process or operations The estates has conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and Risk Control (HIRARC) and chemical Hazard Risk Assessment. The assessment covers all main operations and support operations. The HIRARC was reviewed at minimum once a year, if accident occur or changes on the operation. 	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance								
	<p>must have knowledge and access to latest national regulations and collective agreements.</p> <p>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.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>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.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>The latest HIRARC review was conducted as follows:</p> <table border="1"> <thead> <tr> <th>Operating Unit</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Tebak Estate</td> <td>09/02/2021 for annual review FY 2021</td> </tr> <tr> <td>Jernih Estate</td> <td>13/10/2021 for workshop, driver and mistblower operation die to occupational disease incident to workers as per audiometric test report conducted on 05 - 12/07/2021</td> </tr> <tr> <td>Air Putih Estate</td> <td>17/01/2021 for annual review FY 2021 01/04/2021 for harvesting operation due to accident occur on 22/03/2021</td> </tr> </tbody> </table> <p>c) The chemical handlers have been given training regarding the usage safety and health issue and proper way for chemical application. Reviewed the training records as follows:</p> <p><u>Tebak Estate</u></p> <ol style="list-style-type: none"> 1. Alion usage and spraying SOP training dated 14/06/2021 2. Spraying training by Macrotech Solution Sdn. Bhd. dated 16/03/2021 <p><u>Jernih Estate</u></p> <ol style="list-style-type: none"> 1. Pesticides handling, pesticides application and triple rinsing training dated 04/05/2021 2. Scheduled waste management training dated 28/03/2021 3. Rat baiting training dated 17/03/2021 <p><u>Air Putih Estate</u></p> <ol style="list-style-type: none"> 1. Spraying for nursery training dated 24/02/2021 2. standard use and exposure of chemicals hazardous to health training dated 15/08/2021 	Operating Unit	Date	Tebak Estate	09/02/2021 for annual review FY 2021	Jernih Estate	13/10/2021 for workshop, driver and mistblower operation die to occupational disease incident to workers as per audiometric test report conducted on 05 - 12/07/2021	Air Putih Estate	17/01/2021 for annual review FY 2021 01/04/2021 for harvesting operation due to accident occur on 22/03/2021	
Operating Unit	Date										
Tebak Estate	09/02/2021 for annual review FY 2021										
Jernih Estate	13/10/2021 for workshop, driver and mistblower operation die to occupational disease incident to workers as per audiometric test report conducted on 05 - 12/07/2021										
Air Putih Estate	17/01/2021 for annual review FY 2021 01/04/2021 for harvesting operation due to accident occur on 22/03/2021										

Criterion / Indicator	Assessment Findings	Compliance
	<p>3. Spraying training dated 14/09/2021</p> <p>d) The management provide appropriate PPE to the employee's based on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE issuance was recorded in 'Borang Penyerahan Peralatan kerja dan Pengambilan Barang PPE'.</p> <p><u>Tebak Estate</u> Noted during the interview with sprayers, they was provided with hat, safety google, cotton gloves, nitrile gloves, 3M mask, apron, and wellington boots. Reviewed the issuance records as follows:</p> <ol style="list-style-type: none"> 1. TB1500929 2. TB1300750 3. TB1901118 4. TB1600974 <p><u>Jernih Estate</u> Noted during the interview with harvesters and workshop operators, the were provided with appropriate PPE for their jobs such as safety helmet, sickle cover, safety boots, earplugs, leather gloves, welding shield and etc. Reviewed the PPE issuance records in "Buku Rekod Pengeluaran PPE" for the Workses as follows:</p> <ol style="list-style-type: none"> 1. JN1600747 2. JN1900900 3. JN00217 4. JN00218 	

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance
	<p><u>Air Putih Estate</u> Noted during the interview with sprayers, they was provided with hat, safety google, cotton gloves, nitrile gloves, 3M mask, apron, and wellington boots. Reviewed the issuance records as follows:</p> <ol style="list-style-type: none"> 1. AP2101522 2. AP2101524 <p>e) TDM Plantation Sdn Bhd has established the Agrochemical Management Policy dated 01/04/2021 signed by the CEO. In the policy stated the company commitment to enhance the agrochemical handling that are hazardous to health includes storage, handling, transporting, usage and disposal. TDM Plantation Sdn Bhd has established SOP for Chemical Handling. Refer document no. TDMP-01/2017 dated 01/09/2017.</p> <p>f) The estates manager has been appointed as person responsible for safety and health cum chairman for safety and health committee in as per appointment letter signed by the CEO. The estate management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter signed by the Estate Manager.</p> <p>g) 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 matters arising, OSH objective and program, compliance to legal and requirement, Accident statistic and report, external and internal compliant,</p>	

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p>training and competency, workplace inspection report and other matters. Reviewed minutes meeting as follows:</p> <p><u>Tebak Estate</u></p> <p>Reviewed minutes meeting conducted on 18/03/2021 and 22/09/2021</p> <p><u>Jernih Estate</u></p> <p>The estate has appointed the Asst. Manager as chairman of Safety and Health Committee as per appointment letter no. LNJ JKPP/2021/002 dated 11/03/2021 signed by the Estate Manager. Meeting was conducted on quarterly basis. reviewed the minutes meeting conducted on 11/10/2021, 12/09/2021, 15/06/2021 and 08/03/2021</p> <p><u>Air Putih Estate</u></p> <p>Meeting was conducted on quarterly basis. Reviewed the minutes meeting conducted on 06/09/2021, 15/06/2021 and 14/03/2021.</p> <p>h) TDM Plantation Sdn Bhd has established the SOP for Accident and emergency procedures documented in the Standard Operating Procedure – Emergency Preparedness and Response edition TDM/01, rev. no. TDMP-02/2018 dated 01/01/2018. In the SOP, the emergency plan and ERT to be activated according to the emergency situations as follows:</p> <ol style="list-style-type: none"> 1. Fig. 4.0 – Event of environmental and OSH emergencies including accident/incident 2. Fig. 4.4a – Event of fire 	

Criterion / Indicator		Assessment Findings	Compliance												
		<p>3. Fig. 4.4b – Event of Explosion 4. Fig. 4.4c – Event of Oil Spillage 5. Fig. 4.4d – Event of Effluent Spillage (mills). The Emergency Response Plan Flow Chart has been displayed at strategic places in the estates. The estates visited has established Emergency response team. Training has been conducted regularly to ensure the awareness on the ERP. Reviewed the training records as follows:</p> <ol style="list-style-type: none"> 1. Tebak Estate: Fire drill and firefighting training dated 14/09/2021 2. Jernih Estate: Firefighting training dated 16/03/2021 3. Air Putih Estate: Firefighting training dated 05/10/2021 <p>i) The estates provided first aid kit/box and located in designated places or assigned to competent first aider. The operating units has also established an information on the location of first aid box, name and contact no. of the assigned first aider and communicated through briefing, training and displayed on notice board. First aid kit was monitored on timely basis as follows:</p> <table border="1"> <tbody> <tr> <td>Tebak Estate</td> <td>12/09/2021</td> <td>30/08/2021</td> <td>25/07/2021</td> </tr> <tr> <td>Jernih Estate</td> <td>12/10/2021</td> <td>08/09/2021</td> <td>18/08/2021</td> </tr> <tr> <td>Air Putih Estate</td> <td>13/10/2021</td> <td>15/09/2021</td> <td>08/08/2021</td> </tr> </tbody> </table> <p>The estate continuously provided training to ensure the competency for the first aider. The estate continuously provided training to ensure the competency for the first aider. Reviewed the training records as follows:</p>	Tebak Estate	12/09/2021	30/08/2021	25/07/2021	Jernih Estate	12/10/2021	08/09/2021	18/08/2021	Air Putih Estate	13/10/2021	15/09/2021	08/08/2021	
Tebak Estate	12/09/2021	30/08/2021	25/07/2021												
Jernih Estate	12/10/2021	08/09/2021	18/08/2021												
Air Putih Estate	13/10/2021	15/09/2021	08/08/2021												

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance									
		<p>Tebak Estate: First aid treatment for first aid kit holder training dated 05/10/2021</p> <p>Jernih Estate: First aid treatment and first aid kit equipment dated 17/03/2021</p> <p>Air Putih Estate: First aid kit handling training dated 09/02/2021</p> <p>Noted during interview with workers, the workers were aware regarding the first aid box holders at the field.</p> <p>j) The estates maintain the records of accidents including JKPP 6 forms reported to DOE, medical leaves certificates, accidents investigations report and HIRARC review. The accidents occurrence was reported to the Headquarters through Immediate Notification Records and Detail Investigation Reports and DOSH by submitting the JKPP 6/7 form through MyKKP system. Reviewed the submission of cases to DOSH as follows:</p> <ol style="list-style-type: none"> 1. Jernih Estate: JKPP 7 due to hearing impairment for 7 workers submitted to DOE on 07/10/2021 2. Air Putih Estate: JKPP 6 due to accident occur on 23/03/2021. JKPP 6 submitted to DOSH on 25/06/2021 <p>Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2020 as reported to DOSH as follows:</p> <table border="1"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Tebak Estate</td> <td>1</td> <td>22</td> </tr> <tr> <td>Jernih Estate</td> <td>3</td> <td>186</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	Tebak Estate	1	22	Jernih Estate	3	186	
Operating units	Accident Cases	LTA										
Tebak Estate	1	22										
Jernih Estate	3	186										

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings			Compliance
		Air Putih Estate	0	0	
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 -	On group level, policy for the implementation of MSPO established as TDM Berhad Sustainability Policy; approved by the BOD and signed by TDM Plantation Sdn. Bhd. CEO on 1/4/2021. Briefing of the policies were provided to the workers as per records of internal training report Briefing of Company Policies including MSPO Policy; Date 25/8/2021 for Air Putih Estate workers by all employees. The policies were displayed at the notice board outside the office.			Complied
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 -	On group level, policy for the implementation of MSPO established as TDM Berhad Sustainability Policy; approved by the BOD and signed by TDM Plantation Sdn. Bhd. CEO on 1/4/2021. The policy stated that the management was committed to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality and gender etc. Interviewed with workers confirmed that no discrimination was practice by the management. Briefing of the policies were provided to the workers as per records of internal training report Briefing of Company Policies including MSPO Policy; Date 25/8/2021 for Air Putih Estate workers by all employees.			Complied
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	The management have ensured that employees' pay and conditions meet applicable legal requirements i.e. National Minimum Wages Order 2020 in line with MAPA Circular No. 56/2021; Date: 23/8/2021; Oil Palm MAPA/NUPW on the Wages of Harvesters, Harvesting Kanganies, Loaders and "Other Loaders on Oil Palm Estates, 2019;			Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance
<p>on minimum wage. - Major compliance -</p>	<p>Wage Rate September 2021 & Palm Oil Mill MAPA/NUPW Palm Oil Mill Employees Agreement, 2019; Wage Rates – September 2021. Sighted payslips for following Tebak Estate sampled workers:</p> <ul style="list-style-type: none"> - Employee # TB00079; Post: General Worker - Field; Female - Employee # TB00204; Post: Creche Ayah; Female - Employee # TB1200654; Post: General Worker – Field; Female - Employee # TB2001244; Post: General Worker - Field; Male - Employee # TB2101310; Post: General Worker - Field; Male - Employee # TB1801090; Post: General Worker – Field; Male - Employee # TB1801142; Post: Piece Rate Worker; Male - Employee # TB1400811; Post: General Worker – Field; Male - Employee # TB1500937; Post: Piece Rate Worker; Male - Employee # TB2001230; Post: Harvester; Male <p>Jernih Estate sampled workers:</p> <ul style="list-style-type: none"> - Employee # JN00033; Post: General Worker; Female - Employee # JN0900306; Post: Sprayer; Male - Employee # JN1300572; Post: Harvester; Male - Employee # JN1400634; Post: Tractor Driver; Male - Employee # JN1400656; Post: Harvester; Male - Employee # JN1600749; Post: General Worker; Male - Employee # JN1800818; Post: Sprayer; Male - Employee # JN1800828; Post: Harvester; Male - Employee # JN1800850; Post: General Worker; Male - Employee # JN1900896; Post: General Worker; Female 	

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Air Putih Estate sampled workers:</p> <ul style="list-style-type: none"> - Employee # AP2101505; Post: Lorry Driver; Male - Employee # AP2001458; Post: Harvester; Male - Employee # AP2101502; Post: Nursery Worker; Female - Employee # AP2101525; Post: Sprayer; Male - Employee # AP900517; Post: Harvester; Male - Employee # AP1200714; Post: Mandore; Male - Employee # AP1200721; Post: General Worker; Male - Employee # AP1501127; Post: Tractor Driver; Male - Employee # AP1801266; Post: Loader; Male - Employee # AP1501103; Post: Harvester; Male <p>All samples shown employees received minimum wages as per legal requirements.</p>	
4.4.5.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Management ensured employees of contractors are paid based on National Minimum Wages Order 2020 as per MAPA Circular No. 56/2021; Date: 23/8/2021; Oil Palm MAPA/NUPW on the Wages of Harvesters, Harvesting Kanganies, Loaders and "Other Loaders on Oil Palm Estates, 2019; Wage Rate September 2021 & Palm Oil Mill MAPA/NUPW Palm Oil Mill Employees Agreement, 2019; Wage Rates – September 2021. Sighted the sampled payslips records of the contractor's workers at as following:</p> <p><u>Jernih Estate:</u></p> <ul style="list-style-type: none"> - Work Order Agreement # IP49/20: Land Clearing for Replanting Work at Block 96A2 & 96A4; Total area: 212.75 Ha; Contractor: Kim Foong Construction; Period 30/12/2020 – 28/7/2021. Sample workers: Employee ID # C7329517 & C0824371 	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Air Putih Estate:</u></p> <ul style="list-style-type: none"> - Work Order Agreement (WOA) # AP080/21: Rental of 4 units Mechanical Buffalo for work in Block 14ABCD; Contractor: Edaran Badang Sdn. Bhd.; Period: 1/9/2021 – 30/9/2021. Extension WOA # AP086/21; Period: 1/1/2021 – 31/10/2021 - Work Order Agreement (WOA) # AP085/20: Rental of lorry and driver for FFB transport; Contractor: Nozfa Trading; Period: 1/11/2020 – 30/11/2020. Sample workers: Employee ID # 5277 - Integrity Agreement TDMB/HB-AC/2016/00; Appendix III-d; Supplier’s/Contractor’s Declaration; Nozfa Trading 	
4.4.5.5	<p>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.</p> <p>- Major compliance -</p>	<p>There is a list of employees consist of employee number, name, division, pay, NRIC/Passport no, employment category, nationality, DOB, age, race and status in the HR/Payroll system sighted as at September 2021.</p>	Complied
4.4.5.6	<p>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.</p> <p>- Major compliance -</p>	<p>Fair contracts have been signed by both employee and employer with both kept a copy each as per sighted for sample workers in indicator 4.4.5.3 above.</p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>Recording system established and implemented through the punch card check roll system with reports generated as the Time and Attendance Report for the computation of working hours and overtime that is transparent for both employees and employers.</p>	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.8	<p>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.</p> <p>- Major compliance -</p>	<p>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Employment Act 1955.</p> <p>As at current status, there was none has crossed 104 hours of overtime. Verified the payslips, the payment and calculation of over time well distributed.</p> <p>Overtime rate after 8 hours daily-rated (upkeeps) is as following:</p> <ul style="list-style-type: none"> - Sun - Thu – daily rated / 8 hours x 1.5 - Friday - daily rated / 8 hours x 2.0 - Public holiday – daily rated / 8 hours x 3.0 <p>Overtime rate after 8 hours piece-rated (harvester) is as following:</p> <ul style="list-style-type: none"> - Sun - Thu – flat rate - Friday – flat rate x 2.0 - Public holiday – flat rate x 3.0 	Complied
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Wages and overtime payment documented found consistent with legal regulations and collective agreements as per sample sighted in indicator 4.4.5.3 above.</p>	Complied
4.4.5.10	<p>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.</p> <p>- Minor compliance -</p>	<p>Other forms of social benefits for workers including the mandatory contribution for local workers & staff of Social Security Organization (SOCSO) Monthly Contribution sighted as per sample sighted as following:</p>	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Tebak Estate: Form 8A Socso Acknowledgement Contribution Received (ACR); Employer Code: F8100000658Z; Period: 07/2021; Date: 3/8/2021 - Jernih Estate: Form 8A Socso Acknowledgement Contribution Received (ACR); Employer Code: F8100000660A; Period: 07/2021; Date: 13/8/2021 	
4.4.5.11	<p>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.</p> <p>- Major compliance -</p>	<p>On-site living quarters are provided and visit to the housing area/line site showed quarters are decently habitable and equipped with basic amenities of free electricity and water supply including other facilities such as mosque, community hall, sundry store, canteen, children's crèche and football field.</p> <p>Common clinic shared between Tebak, Jernih and Pelantoh Estate and Kemaman Mill located in Tebak Estate operated by 2 Estate Hospital Assistants (EHA). Air Putih Estate has own clinic and EHA. Sighted the latest housing inspection records shown the following:</p> <ul style="list-style-type: none"> - Latest VMO visit for Air Putih Estate dated 6/10/2021 by Dr. Noraslinda Abu Bakar from Klinik Bestari Dungun. - Latest housing inspection by HA conducted on 25/10/2021 for workers line site main division, creche, chemical store, workshop & hall. - Clinical waste collected by Clinco Waste Management Sdn. Bhd. as per agreement for service (Incineration and Disposal of Clinical Wastes) dated 24/6/2019 between Edgenta Mediserve Sdn. Bhd. and Clinco Waste Management Sdn. Bhd. 	Complied
4.4.5.12	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p>	<p>TDM Plantation Sdn Bhd has developed Gender Policy and Reproductive Policy dated 1/4/2021 which signed by CEO. The management will ensure the workplace and surrounding are free</p>	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>from any types of harassment included ethnic harassment, religious, gender, country of origin and etc. They will ensure that the rights of women will be protected.</p> <p>Periodical meetings conducted among women employees through Women Association as per sample records of Sustainability Gender Committee Meeting in Air Putih Estate; Minutes of meeting ref. # LAP/GENDER/001/2021; Date: 10/2/2021.</p>	
4.4.5.13	<p>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.</p> <p>- Major compliance -</p>	<p>The Social Policy signed by Haji Mohd. Ghazali Bin Yahaya; Chief Executive Officer (CEO) on 1/4/2021 stated that TDM committed to comply with principles as following:</p> <ul style="list-style-type: none"> - Fair treatment to everyone without discrimination - Freedom of association to everyone - Strongly opposed force labour and child labor <p>Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p> <p>During the interview with workers, there are no evidence received that there are restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</p> <p>Sighted the latest employee representative meeting as per Minutes of Meeting Co-operative Board Council; 2nd Session 2020/2021; Date: 7/4/2021.</p>	Complied
4.4.5.14	<p>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</p>	<p>TDM Plantation Sdn Bhd has developed Child Protection Policy dated 1/4/2021 which signed by CEO. The company will not recruit or exploit any individual less than 16 years old to work in the company. Seen the employee master list confirmed that all the workers were above 18 years old. Besides, interviewed with workers and</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	programmes. Children shall not exposed to hazardous working conditions. - Major compliance -	stakeholders confirmed that TDM Plantation Sdn Bhd did not recruit any workers less than 18 years old.	
Criterion 4.4.6: Training and competency			
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 operating units maintained the training records conducted. Reviewed the training records as follows: <u>Tebak Estate</u> 1. IPM beneficial plant planting dated 07/10/2021 2. First aid treatment for first aid kit holder training dated 05/10/2021 3. Land surf training dated 05/09/2021 4. Alion usage and spraying SOP training dated 14/06/2021 5. Badang/mechanical buffalo training dated 25/06/2021 6. Preventive maintenance vehicle and safety driving training dated 07 – 08/04/2021 7. Spraying training by Macrotech Solution Sdn. Bhd. dated 16/03/2021 8. Working at height training dated 14/01/2021 9. Fire drill and firefighting training dated 14/09/2021 <u>Jernih Estate</u> 1. Personal hearing protection training dated 13/10/2021 2. TDMP Policy, RSPA and MSPO training dated 12/10/2021 3. Environmental, HCV and buffer zone training dated 05/10/2021	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		4. COVID-19 Antigen detection kit usage training dated 29/08/2021 5. Fertilizer application CPD 50 training dated 05/05/2021 6. Pesticides handling, pesticides application and triple rinsing training dated 04/05/2021 7. Safety driving and preventive maintenance vehicle training dated 07 – 08/04/2021 8. Scheduled waste management training dated 28/03/2021 9. Rat baiting training dated 17/03/2021 10.PPE awareness training dated 17/03/2021 11.Bagworm census training dated 08/03/2021 12.Integrated pest management training dated 23/02/2021 <u>Air Putih Estate</u> 1. FFB harvesting training dated 03, 07 and 10/03/2021 2. Safety driving for estate vehicle dated 25/04/2021 3. MSPO policy briefing dated 25/08/2021 4. Company policy briefing dated 25/08/2021 5. Hand weeding training dated 15/09/2021 6. Workshop management and safety training dated 25/09/2021 7. Mechanical Buffalo training dated 02/10/2021	
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.	The estates visited conducted training need analysis to identify training required for the employee and documented in Training Matrix FY 2021.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	The estate have also conducted assessment to the training attendees to assess the training efficiency.	
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 established training schedule FY 2021 base on training need analysis conducted. The training program covers Policy, operation and OSH/others. The program involve the executive, staff/field supervisor, workers and contractors. The identified training was programmed throughout the year.	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem 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 -	TDM Plantation Sdn Bhd has established Biodiversity and Environmental Policy dated 01/04/2021 signed by the CEO. In the policy stated the company commitment to: i. Complied with all statutory requirement regarding biodiversity and environmental ii. creating, maintaining and continuous improvement of sustainable plantation management iii. eliminate potential adverse effects on the environment and biodiversity that may arise from plantation activities iv. provide an effective work system subject to Environmental Quality Act 1974 v. Ensure zero burning is always given priority as stipulated in the Environmental Quality (Declared Activities) (Open Burning) Order 2003	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		The policy was communicated to the employee through displayed at notice board at the office, training and morning briefing.	
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. <p>- Major compliance -</p>	<p>The estates conducted aspect and impacts analysis of all operations as per SOP established and documented in Standard Operating Procedure – Environmental Aspects/Impacts Evaluation date 01/11/2017, edition TDMP/01 rev. TDMP – 01/2017.</p> <p>The estates conducted environmental aspects impacts analysis for all operation in the estate and documented in Environmental Aspect Identification and Environmental Impact Evaluation.</p> <p>The management review the environmental aspects impacts on annually basis or if there is changes in the legal or mill operation.</p> <p><u>Tebak Estate</u> Latest aspect impacts analysis review was conducted in February 2021. Base EAI and EIE conducted, the estate established environmental management plan.</p> <p><u>Jernih Estate</u> Latest aspect impacts analysis review was conducted in 13/07/2021. Base EAI and EIE conducted, the estate established environmental management plan.</p> <p><u>Air Putih Estate</u> Latest aspect impacts analysis review was conducted in 10/03/2021. Base EAI and EIE conducted, the estate established environmental management plan.</p> <p>Noted during site visit at all estates it was sighted that the bio-compost fertilizer was dump at the roadside before applied in the field. Reviewed the EAI and EIE conducted, the bio-compost application was not captured in the assessment conducted.</p>	Minor Non-Compliance

Criterion / Indicator		Assessment Findings	Compliance
		Thus, the NC was raised.	
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>The management review the environmental aspects impacts on annually basis or if there is changes in the legal or estates operation.</p> <p><u>Tebak Estate</u></p> <p>Latest review was conducted in February 2021. Based on the EIE and EAI conducted, the estate has established Environmental Management Plan. Reviewed the implementation as follows:</p> <ol style="list-style-type: none"> 1. To reduce the usage of rat bait, the estate uses biological control, barn owl to control the rat population in the estate. The current ration of barn owl box in the estate recorded at 1:12 ha. Latest census was conducted in August 2021 with occupancy recorded at 35%. 2. The empty pesticides containers were triple rinse and reuse back as pre-mix chemical container. The estate monitors the inventory of empty pesticides container on monthly. Reviewed the inventory records dated 22/08/2021, 14/07/2021 and 22/06/2021. <p><u>Jernih Estate</u></p> <ol style="list-style-type: none"> 1. The estate has placed containers at workshop, triple rinse station and office area to harvest rainwater. The water was used for chemical premix, washing vehicle and watering plant. 2. The estate collected all wastewater from chemical premix operation in collection sump and reused back as water for chemical premixing. 3. To reduce the usage of rat bait, the estate uses biological control, barn owl to control the rat population in the estate. The current ration of barn owl box in the estate recorded at 1:7.47 ha. Latest 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>census was conducted in August 2021 with occupancy recorded at 73%.</p> <p><u>Air Putih Estate</u></p> <ol style="list-style-type: none"> 1. To reduce the usage of rat bait, the estate uses biological control, barn owl to control the rat population in the estate. The current ration of barn owl box in the estate recorded at 1:19 ha. The estate conducted barn owl census bimonthly. Latest census was conducted in August 2021 with occupancy recorded at 87.23%. 2. To control pest, the estate planted beneficial plant along the road in the estate. The estate plant Tunera Subulata, Cassia sp. And Antigonan sp. As sighted during site visit at field P14B and P15C. As todate, the estate has completed the beneficial plant planting at 32.58 decameter/ha. 3. The estates collected all wastewater from chemical premix operation in collection sump and reused back as water for chemical premixing. 4. The estates has placed containers at workshop, triple rinse station and office area to harvest rainwater. The water was used for chemical premix, washing vehicle and watering plant. 	
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>Program to promote the positive impacts was documented in the Continuous Improvement Plan/Environmental Management Plan. Sighted the improvement plan as follows:</p> <ol style="list-style-type: none"> 1. Planting beneficial plan such as Tunera Subulata to control pest 2. Frond stacking to enhance the beneficial microbe and bacteria for soil fertility 3. Rainwater harvesting 	Complied

Criterion / Indicator		Assessment Findings	Compliance																
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	The estates visited continuously provide training to the workers to create awareness regarding the environmental policy and management plan established. Sighted the training records as stated in criteria 4.4.6.1 above.	Complied																
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	The management has established Environmental Performance Monitoring Committee. The committee consist of representative from the employer and employee. The committee conducted meeting on quarterly basis. Reviewed the minutes meeting as follows: <table border="1" data-bbox="1048 836 1854 970"> <thead> <tr> <th></th> <th>1st quarter</th> <th>2nd quarter</th> <th>3rd quarter</th> </tr> </thead> <tbody> <tr> <td>Tebak Estate</td> <td>08/03/2021</td> <td>24/06/2021</td> <td>22/09/2021</td> </tr> <tr> <td>Jernih Estate</td> <td>09/03/2021</td> <td>14/06/2021</td> <td>13/09/2021</td> </tr> <tr> <td>Air Putih Estate</td> <td>15/03/2021</td> <td>08/06/2021</td> <td>12/09/2021</td> </tr> </tbody> </table>		1 st quarter	2 nd quarter	3 rd quarter	Tebak Estate	08/03/2021	24/06/2021	22/09/2021	Jernih Estate	09/03/2021	14/06/2021	13/09/2021	Air Putih Estate	15/03/2021	08/06/2021	12/09/2021	Complied
	1 st quarter	2 nd quarter	3 rd quarter																
Tebak Estate	08/03/2021	24/06/2021	22/09/2021																
Jernih Estate	09/03/2021	14/06/2021	13/09/2021																
Air Putih Estate	15/03/2021	08/06/2021	12/09/2021																
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	The estates visited has established management plan to assess the usage of the non-renewable energy in the estate and documented in the Continuous Improvement Plan. Sighted the implementation of the management plan FY 2021 as follows: <ol style="list-style-type: none"> The estates monitor the consumption of diesel on monthly basis. Reviewed the records as follows: <table border="1" data-bbox="1093 1262 1845 1396"> <thead> <tr> <th></th> <th>Tebak Estate</th> <th>Jernih Estate</th> <th>Air Putih Estate</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>3.21</td> <td>4.05</td> <td>4.43</td> </tr> <tr> <td>Feb</td> <td>3.30</td> <td>3.14</td> <td>5.09</td> </tr> <tr> <td>Mar</td> <td>2.46</td> <td>3.35</td> <td>4.90</td> </tr> </tbody> </table> 		Tebak Estate	Jernih Estate	Air Putih Estate	Jan	3.21	4.05	4.43	Feb	3.30	3.14	5.09	Mar	2.46	3.35	4.90	Complied
	Tebak Estate	Jernih Estate	Air Putih Estate																
Jan	3.21	4.05	4.43																
Feb	3.30	3.14	5.09																
Mar	2.46	3.35	4.90																

Criterion / Indicator		Assessment Findings				Compliance
		Apr	2.71	3.28	4.66	
		May	3.01	3.53	3.69	
		Jun	2.89	3.96	3.30	
		Jul	2.95	3.98	4.64	
		Aug	2.11	2.32	2.85	
		Sep	3.00	2.71	2.94	
		2. The estates monitor the vehicle condition on daily basis recorded in "Pemeriksaan harian/mingguan kendaraan". Reviewed the records for vehicle no. TR 5281 and TAP 2584 for the month of July, August and September 2021 in Tebak Estate. 3. Reviewed the diesel usage by tractor records by monthly for the month of August and September for vehicle with reg. no. BKD 4804 and TAY 5075 in Jernih Estate. 4. The estates monitor the vehicle condition on daily basis recorded in "Pemeriksaan harian/mingguan kendaraan". Reviewed the records for vehicle no. TBV 9713, TBA 290, TAJ 8504 and MB no. 7 and MB no. 3 for the month of September and October 2021				
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 estates has established baseline for diesel usage based on 3 years diesel consumption trend. 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.				Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	No possibility of renewable energy used in the estates visited.				Complied
Criterion 4.5.3: Waste management and disposal						

Criterion / Indicator		Assessment Findings	Compliance								
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>The estates have identified the waste products and source pollution generated in the estates and mill. The waste are categorized as follows:</p> <table border="1"> <thead> <tr> <th>Type</th> <th>Item Description</th> </tr> </thead> <tbody> <tr> <td>Scheduled Waste</td> <td>SW 102 – Waste of lead acid batteries SW 305 – spent lubricant SW 306 – spent hydraulic oil SW 410 – rags, plastics, papers, contaminated filters SW 404 – Clinical waste SW 409 – empty chemical containers</td> </tr> <tr> <td>Domestic waste</td> <td>Rubbish</td> </tr> <tr> <td>Industrial waste</td> <td>Scrap metal EFB</td> </tr> </tbody> </table>	Type	Item Description	Scheduled Waste	SW 102 – Waste of lead acid batteries SW 305 – spent lubricant SW 306 – spent hydraulic oil SW 410 – rags, plastics, papers, contaminated filters SW 404 – Clinical waste SW 409 – empty chemical containers	Domestic waste	Rubbish	Industrial waste	Scrap metal EFB	Complied
Type	Item Description										
Scheduled Waste	SW 102 – Waste of lead acid batteries SW 305 – spent lubricant SW 306 – spent hydraulic oil SW 410 – rags, plastics, papers, contaminated filters SW 404 – Clinical waste SW 409 – empty chemical containers										
Domestic waste	Rubbish										
Industrial waste	Scrap metal EFB										
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>The estate has established management Plan base on the identification and source of pollutions and the documented in Waste management Plan FY 2021 and were available for review. In the management plan stated the type of waste, description, source of pollution, action to be taken and person responsible.</p> <p>Reviewed the implementation of the management plan as follows:</p> <p><u>Tebak Estate</u></p> <p>1. The estate continuously create awareness on the 3R (Reduce, reuse, recycle) program to the workers through training, briefing and posters displayed at the notice board. Reviewed the training records dated 18/08/2021. The estate records the collection of recycle program in logbook. Review latest records dated 12/01/2021.</p>	Complied								

Criterion / Indicator	Assessment Findings	Compliance
	<p>2. The empty pesticides containers were triple rinse and reuse back as pre-mix chemical container. The estate monitors the inventory of empty pesticides container on monthly. Reviewed the inventory records dated 22/08/2021, 14/07/2021 and 22/06/2021.</p> <p>3. The estate applied bio-compost (bio-organic fertilizer) as nutrient cycle program. As September 2021, the estate has applied 2842.26 ton of bio-compost.</p> <p><u>Jernih Estate</u></p> <p>1. The estate collected the domestic waste 3 times a week and disposed at the designated landfill. Sighted the landfill at field P06A, only domestic waste were disposed in the landfill. Reviewed collection records dated 29/08/2021, 02/09/2021, 05/09/2021 and 07/09/2021.</p> <p>2. The estate applied bio-compost (bio-organic fertilizer) as nutrient cycle program. Noted during site visit at field P16, it was sighted that the bio-compost fertilizer application in the field.</p> <p><u>Air Putih Estate</u></p> <p>1. The estate applied bio-compost (bio-organic fertilizer) as nutrient cycle program. Noted during site visit at field P15, it was sighted that the bio-compost fertilizer application in the field.</p> <p>2. The estate maintain the inventory of the scheduled waste generated and reported to DOE through ESWISS. Reviewed the inventory records for the month of July, August and September.</p> <p>3. The estate collected the waste water from chemical premixing area in the collection container. The water was reuse back as water for premixing.</p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>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.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established SOP for handling scheduled waste and documented in Standard Operating procedure – Procedure for handling schedule waste dated 1/11/2008, edition TDMP/02 rev. TDMP – 02/2017.</p> <p>The estate also has 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 estates visited, and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>The estate maintains the inventory records of the Scheduled Waste generated and reported to DOE through ESWISS. Reviewed the Fifth Scheduled: Inventory of Scheduled Waste for the month of July, August, September and October 2021.</p> <p>Inventory for all scheduled waste generated were recorded and reported to DOE through E-SWISS. Reviewed the sampled scheduled waste disposal records:</p> <p><u>Tebak Estate</u></p> <ol style="list-style-type: none"> 1. 10/10/2021, SW 409, C/N no. 2021102216OUT2N9 2. 20/09/2021, SW 404, C/N no. 2021092010TFJ2C9 <p><u>Jernih Estate</u></p> <ol style="list-style-type: none"> 1. 28/08/2021, SW 305, C/N no. 2021082814WAPUD6 2. 28/08/2021, SW 409, C/N no. 202108281461STYH 3. 29/08/2021, SW 410, C/N no. 2021082915ZJ2DTI <p><u>Air Putih Estate</u></p> <ol style="list-style-type: none"> 1. 19/09/2021, SW 404, CN no. 202109191108P4FS 	<p>Complied</p>

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		2. 23/03/2021, SW 404, CN no. 2021032314LTP0P1W 3. 07/09/2021, SW 410, CN. No. 2021090709YTNOZE 4. 07/09/2021, SW 409, CN. No. 2021090709NPH8CJ 5. 07/09/2021, SW 305, CN. No. 20210907092LF4DO	
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 triple rinse and puncture before being disposed as scheduled waste. Reviewed the disposal records as follows: - Tebak Estate: 10/10/2021, SW 409, C/N no. 2021102216OUT2N9 - Jernih Estate: 28/08/2021, SW 409, C/N no. 202108281461STYH - Air Putih Estate: 07/09/2021, SW 409, CN. No. 2021090709NPH8CJ	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 -	<u>Tebak Estate</u> The estate collected the domestic waste 3 times a week and disposed at the designated landfill. Sighted the landfill at field P95A, only domestic waste were disposed in the landfill. <u>Jernih Estate</u> The estate collected the domestic waste 3 times a week and disposed at the designated landfill. Sighted the landfill at field P06A, only domestic waste were disposed in the landfill. Reviewed collection records dated 29/08/2021, 02/09/2021, 05/09/2021 and 07/09/2021. <u>Air Putih Estate</u> The estate collected the domestic waste 3 times a week and disposed at the designated landfill. Sighted the landfill at field P14B, only domestic waste were disposed in the landfill.	Complied

Criterion / Indicator		Assessment Findings	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 -	The estate 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 identified during the assessment and documented in the Pollution Prevention Plan/ Environmental Management Plan.	Complied																										
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	A management plan has been established based on the significant aspect identified during the assessment and documented in the Pollution Prevention Plan/Environmental Management Plan.	Complied																										
Criterion 4.5.5: Natural water resources																													
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at 	<p>a. Policy signed by the CEO dated 01/04/2021. In the policy stated that river buffer zone must be maintained at both side of riverbank as per schedule below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>The estates visited monitored the water consumption on monthly basis in liters per metric ton FFB produced (l/mt FFB). Sighted the sampled records as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Tebak Estate</th> <th>Jernih Estate</th> <th>Air Putih Estate</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>3.78</td> <td>2.15</td> <td>5.15</td> </tr> </tbody> </table>	No	River width	Buffer zone	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	Month	Tebak Estate	Jernih Estate	Air Putih Estate	Jan	3.78	2.15	5.15	Complied
No	River width	Buffer zone																											
1	> 40 meters	50 meters																											
2	20 - 40 meters	40 meters																											
3	10 - 20 meters	20 meters																											
4	5 - 10 meters	10 meters																											
5	< 5 meters	5 meters																											
Month	Tebak Estate	Jernih Estate	Air Putih Estate																										
Jan	3.78	2.15	5.15																										

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings				Compliance
<p>or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>		Feb	3.45	1.84	4.44	
		Mar	3.88	1.77	5.01	
		Apr	3.56	1.91	4.63	
		May	4.24	1.40	4.24	
		Jun	3.09	1.78	3.52	
		Jul	3.15	2.20	3.49	
		Aug	3.57	1.12	4.88	
		Sep	3.29	1.04	N/A	
		<p>The estates visited has established Action Plan for Reduction of Water and Contingency Plan during water shortage.</p>				
		<p>b. TDM Plantation Sdn Bhd has established SOP for Taking Water Samples from sampling Points/Streams/Rivers. Refer document no. TDM/EST/01 rev. EST-02/2018 dated 01/12/2018.</p> <p>The estate conducted river water quality monitoring on annually basis as per SOP established. Reviewed the records as follows:</p> <p><u>Tebak Estate</u></p> <p>Latest river water sampling was conducted on 09/09/2021. Refer lab report no. 21/09/W0603 dated 22/09/2021. The results were complied with limit stated in Class IIA/IIB of NWQSM.</p> <p><u>Jernih Estate</u></p> <p>Latest river water sampling was conducted on 09/09/2021. Refer lab report no. 21/09/W0602 dated 22/09/2021. The results were complied with limit stated in Class IIA/IIB of NWQSM.</p> <p><u>Air Putih Estate</u></p> <p>Latest river water sampling was conducted on 23/09/2021. Refer lab report no. 21/09/W0646 dated 05/10/2021. The results were complied with limit stated in Class IIA/IIB of NWQSM.</p>				

Criterion / Indicator		Assessment Findings	Compliance
		<p>c. Harvesting of rainwater was practiced at estate operation i.e. water bodies area whereas in the field drain, collection drain and main drain was well maintained to collect rainwater. Pruned palm oil fronds are heaped at interrow and soft grass allowed to grow to retain moisture and prevent nutrient washout.</p> <p>d. The riparian buffer zone along natural waterway was established. No chemical spraying within the 5 meters from riverbank is allowed. Observed adequate maintaining and restoring appropriate riparian buffer zones at along all-natural waterways within the estate. Training was given to sprayers and manurers on no chemical application at the prohibited areas of the buffer zone.</p> <p>e. Site visit has confirmed that riparian buffer was well maintained as per policy statement.</p> <p>f. It was confirmed that there was no bore well available at the assessed estates.</p>	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	Sighted during field visit in all estates visited, no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	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 -	Water management plan includes rainwater harvesting, desilting of roadside drains etc. For office/housing complex, the rainwater harvesting was used for cleaning housing compound etc.	Complied
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			

Criterion / Indicator		Assessment Findings	Compliance								
4.5.6.1	<p>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:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (<i>e.g.</i> 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.</p> <p>- Major compliance -</p>	<p>The estates has conducted Biodiversity Assessment for Kemaman Complex by SRA Consultancy as per report dated November 2011. HCV Toolkit for Malaysia by WWF – Malaysia was used. There were appropriate consultation processes as per the HCV Toolkit-Malaysia which covers the three main components of identification, management and monitoring.</p> <p>Among the HCV and Conservation area identified as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>HCV Area/ Conservation Area</th> </tr> </thead> <tbody> <tr> <td>Tebak Estate</td> <td>HCV 4 – River buffer zone for Sg. Tebak Conservation area - Unplantable reserve for estate</td> </tr> <tr> <td>Jernih Estate</td> <td>HCV 4 - River buffer zone for Sg. Mas and Sg. Tebak HCV 6 - Masjid Conservation area - Abandon field P97A, P97B and P96A</td> </tr> <tr> <td>Air Putih Estate</td> <td>HCV 4 - River buffer zone Sg. Rambai Conservation area - Tabung F</td> </tr> </tbody> </table>	Estate	HCV Area/ Conservation Area	Tebak Estate	HCV 4 – River buffer zone for Sg. Tebak Conservation area - Unplantable reserve for estate	Jernih Estate	HCV 4 - River buffer zone for Sg. Mas and Sg. Tebak HCV 6 - Masjid Conservation area - Abandon field P97A, P97B and P96A	Air Putih Estate	HCV 4 - River buffer zone Sg. Rambai Conservation area - Tabung F	Complied
Estate	HCV Area/ Conservation Area										
Tebak Estate	HCV 4 – River buffer zone for Sg. Tebak Conservation area - Unplantable reserve for estate										
Jernih Estate	HCV 4 - River buffer zone for Sg. Mas and Sg. Tebak HCV 6 - Masjid Conservation area - Abandon field P97A, P97B and P96A										
Air Putih Estate	HCV 4 - River buffer zone Sg. Rambai Conservation area - Tabung F										
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>Endangered, rare and threatened species classified by IUCN was recorded in the report findings for the studies undertaken. Among the species recorded are elephant (<i>Elephas maximus</i>), Malayan tiger (<i>Panthera Tigris Corbetti</i>), Malayan tapir (<i>Tapirus Indicus</i>) and wild boar. Other species captured during the assessment was monkey and birds. It is due to certain estate bordering with the forest reserve.</p> <p>The estates visited continues to create awareness on the RTE through training. Signboard of prohibition of illegal hunting were erected at several strategic places in the estates such as estates</p>	Complied								

Criterion / Indicator		Assessment Findings	Compliance
		<p>entrance, office, housing areas and conservation areas. Reviewed training records as follows:</p> <ol style="list-style-type: none"> 1. Tebak Estate: HCV Monitoring training dated 27/09/2021 2. Jernih Estate: Environmental, HCV and buffer zone training dated 05/10/2021 3. Air Putih Estate: HCV awareness training dated 10/10/2021 	
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>The estate has established HCV Management and Monitoring Plan 2021. Reviewed the implementation of the management plan as follows:</p> <p><u>Tebak Estate</u></p> <ol style="list-style-type: none"> 1. Latest river water sampling was conducted on 09/09/2021. Refer lab report no. 21/09/W0603 dated 22/09/2021. The results were complied with limit stated in Class IIA/IIB of NWQSM. 2. The estate conducted HCV monitoring on annually basis. Latest HCV monitoring was conducted in June 2021. During the monitoring, sighted the evidence of wild boar footprint at the HCV area. <p><u>Jernih Estate</u></p> <ol style="list-style-type: none"> 1. The estate has erected the signboard on HCV and prohibition to conduct activity such as encroachment, fishing, chemical application at the HCV (buffer zone area) as sighted at field P05B. 2. The estate conducted the HCV monitoring on bimonthly basis. Reviewed the monitoring records for the month of September, July and May 2021. 3. Latest river water sampling was conducted on 09/09/2021. Refer lab report no. 21/09/W0602 dated 22/09/2021. The results were 	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p>complied with limit stated in Class IIA/IIB of NWQSM.</p> <p><u>Air Putih Estate</u></p> <ol style="list-style-type: none"> The estate has erected signboard on prohibition of hunting in the estate. Sighted the signboard erected at the estate entrance and HCV area. The estate conducted the HCV monitoring on bimonthly basis. Reviewed the monitoring records for the month of September, July and May 2021. Among the observation sighted during the monitoring such as animal footprint, wild boar nest and animals' dung. 	
Criterion 4.5.7: Zero burning practices			
4.5.7.1	<p>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.</p> <p>- Major compliance -</p>	<p>There was no land preparation of existence or new planting in SOU Estates by burning ever since TDM Plantation Sdn Bhd practiced zero burning as per the policy in:</p> <ol style="list-style-type: none"> Under felling/clearing & land preparation Carbon Policy <p>TDM Plantation Sdn Bhd has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.</p>	Complied
4.5.7.2	<p>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.</p>	<p>No areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.</p>	Not Applicable

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	There is no controlled burning carried out in preparation of replanting in the estates visited.	Not Applicable
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	The standard operation procedure SOP for the estates operations is available which is prepared on Group basis. There are levels of the documentation identified as follows; a) Level 1 standard operating procedure b) Level 2 work instruction c) Level 3 records. Amendments are made should there be requirement to suit the local issues/situation. Latest Standard Operating Procedure updated as follows: TDM Plantation Sdn Bhd has established system to monitor and control of best practice implementation at its estate such as: 1. Internal audit by Sustainability Department.	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		2. Plantation Controller Visit 3. Agronomist visit. 4. Monthly progress report submitted to the headquarters. Reviewed the monitoring records as follows: <u>Tebak Estate</u> 1. Reviewed the Plantation Controller visit report documented in the Monthly Progress report for the month of June 2021 2. Reviewed the monthly progress report for the month of June 2021 3. Reviewed the latest Plantation Advisor report for visit conducted on 09/06/2020 <u>Jernih Estate</u> 1. Reviewed the monthly progress report for the month of August 2021 2. Reviewed the agronomist visit report dated 10/10/2021 for visit conducted on 04/10/2021	
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 -	TDM Plantation Sdn Bhd has established Slope Protection and River Buffer Zone Policy signed by the CEO dated 01/04/2021. In the policy stated as follows: 1. For area with slope more than 25° must be excluded from new planting development and replanting program. 2. For area with slopes less than 25°, existing crops and plants should be properly maintained.	Complied
4.6.1.3	A visual identification or reference system shall be established for each field.	During site verification, seen all fields are marked and identified.	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance						
	- Major compliance -	Information like year planting (field no) and the total hectare is shown in all markers. There are both stencilled at the palm trees and also displayed in signage at the boundary/corners of every fields.							
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 -	The estates visited continued to commit to long term economic and financial viability. The annual budgets for 2021 to 2026 were sighted. The budget covers as follows: 1. Hectare statement 2. FFB, Yield per ha 3. CPO 4. PKO 5. General Overheads 6. Labour Overheads 7. Other overheads 8. Upkeep cultivations 9. Harvesting and collection 10. EPC, Proportion of General Charges	Complied						
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	The long-range replanting programs (LRRP) until 2025 were sighted on all the Estates. The program is reviewed annually and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares was as follows: <table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td></td> <td>2021</td> <td>2022</td> <td>2023</td> <td>2024</td> <td>2025</td> </tr> </table>		2021	2022	2023	2024	2025	Complied
	2021	2022	2023	2024	2025				

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings					Compliance	
		Tebak Estate	219.90	565.30	396.34	398.27	0.00	
		Jernih Estate	212.75	-	-	205.50	-	
		Air Putih Estate	-	188.76	445.70	665.90	224.61	
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> 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 e) Financial indicators: cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>The estates visited continued to commit to long term economic and financial viability. The annual budgets for 2021 to 2026 were sighted. The budget covers as follows:</p> <ol style="list-style-type: none"> 1. Hectare statement 2. FFB, Yield per ha 3. CPO 4. PKO 5. General Overheads 6. Labour Overheads 7. Other overheads 8. Upkeep cultivations 9. Harvesting and collection 10. EPC, Proportion of General Charges 					Complied	
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>Operating units visited maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. The Plantation Controller (PC) is accountable to monitor the estates compliance towards the SOP, Budget and Productivity among others. Estates / Mill performances are reviewed during the monthly meeting with PC/CEO.</p>					Complied	

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
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 contractors have signed on the service agreement or Work Order Agreement prior to provide services. The agreement has detailed the pricing mechanism for the service offered. Sighted Work Order Agreement samples together with Code of Ethics & Business Conducts; CoBE TDM; Rev. 01; Approved date: 25/3/2018 for following: - Ladang Tebak Contractor: Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad; Work Order # TB 015/2021; Date: 28/7/2021; Contract period: 1/9/2021 – 30/9/2021 - Tebak Estate worker’s policy briefing/training; Date: 9/3/2021	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	The payment was made by Head Office after the mill has sent the invoice to Head Office. Interviewed with the contractors confirmed that the payment was made promptly.	Complied
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. - Major compliance -	Tebak Estate provided MSPO information and documentation for engaged contractors via work agreement signed by the contractors prior to delivery of work items and/or services. Briefing to contractors together done by mill management to contractors during signing of <i>Perjanjian Pesanan Kerja</i> (Work Order Agreement) which included the provision for contractors to comply with legal requirements, MSPO requirements and authorization by the estate to audit the contractors from time to time on their compliance against all relevant requirements.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Evidence of agreed contracts with contractor provided by the estates together with Code of Ethics & Business Conducts; CoBE TDM; Rev. 01; Approved date: 25/3/2018 for following: - Ladang Tebak Contractor: Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad; Work Order # TB 015/2021; Date: 28/7/2021; Contract period: 1/9/2021 – 30/9/2021 - Tebak Estate worker’s policy briefing/training; Date: 9/3/2021	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	TDM Plantation Sdn Bhd has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	The contractor will issued the working chit for every work done on daily basis as stated in the contract agreement. During the month end, the contractor will issued the tax invoice to the company for all the work done to proceed for payment.	Complied
4.7 Principle 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. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
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	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	<p>Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required.</p> <p>- Major compliance -</p>		
Criterion 4.7.2: Peat Land			
4.7.2.1	<p>New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.</p> <p>- Major compliance -</p>	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	<p>A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.</p> <p>- Major compliance -</p>	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
4.7.3.2	<p>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.</p> <p>- Major compliance -</p>	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
4.7.3.3	<p>The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.</p> <p>- Major compliance -</p>	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
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. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
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.	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
Criterion 4.7.6: Customary land			
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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
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.	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable
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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	Not Applicable

MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) 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 -	On group level, policy for the implementation of MSPO established as TDM Berhad Sustainability Policy; approved by the BOD and signed by TDM Plantation Sdn. Bhd. CEO on 1/4/2021. Latest MSPO Policy briefing was conducted by Kemaman Palm Oil Mill management to all workers on 23/3/2021.	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 established policy has emphasized on the commitment to continual Improvement with the objective of improving the milling operation.	Complied
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 -	Internal audit for Kemaman Palm Oil Mill was planned and conducted on 17/7/2019 as per report of KPOM Sustainability Audit dated 24/7/2019. Records of internal audit report and findings shown the internal audit able to determine the strong and weak points and potential area for further improvement. A total of 3 noncompliance and 8 observations were raised by the internal auditors in the internal audit.	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	Internal audit procedure established as TDM Plantation Sdn. Bhd. KPOM MSPO Internal Audit Standard Operating Procedure; Date: 1/8/2017; Edition: TDMP/01; Rev.: TDMP-01/2017. Identified findings recorded in Sustainability Audit Non-Compliance Findings	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	corrective action. - Major compliance -	& Recommendations as well as Visual Inspections & Site Visit form as per sighted for the latest audit conducted on 17/7/2019. Sighted the Corrective Action Report on Non-compliance Findings on the analysis of nonconformity raised.	
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	Report of internal audit complete with corrective action was made available for review in the management review meeting to be conducted.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	<p>Previous management review was conducted on 12/9/2021 as per Minutes of Meeting Marketing & Operation Meeting (MOM) 09/2021 records. Review meeting was chaired by the CEO and attended by plantation controllers, all operating unit managers as well as other departmental managers including sustainability, marketing, and finance. Latest review meeting was conducted on 12/10/2021 as per notification email of 10th Marketing & Operation Meeting Year 2021 (MOM – 10/2021). Sighted the agenda to be review as following:</p> <ul style="list-style-type: none"> a) Confirmation of 9th Meeting (09/2021) held on 12/9/2021 b) Matters arising c) Marketing report as at September 2021 by TDM Trading d) Palm Oil Mill Performance as at September 2021 e) Bio-Organic Fertilizer (BOF) Plant Performances as at Sep 2021 f) Stevia Delivery Report 	Complied

Criterion / Indicator		Assessment Findings	Compliance														
		g) Management review on RSPO/MSP0/CoP on Supply Chain – Sustainability Matters h) Any other matters															
Criterion 4.1.4 – Continual Improvement																	
4.1.4.1	<p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p>- Major compliance -</p>	<p>Based on the Sustainability Committee TDM South Zone Brief Report of Sustainability and Challenges (TDM South Zone) June 2021, the mill established a Continuous Improvement Plan FY 2021/2022 dated June 2021 which based on consideration of main social and environmental impact as well as opportunities for company. Amongst all, 2021 on-going and completed plan include the following samples:</p> <table border="1"> <thead> <tr> <th>Category</th> <th>Issue</th> <th>Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Welfare/ Social</td> <td>Location of workers housing too close to effluent ponds</td> <td>Relocate to safer and better location</td> </tr> <tr> <td>Insufficient workers housing</td> <td>Additional housing construction</td> </tr> <tr> <td>Bad road surface</td> <td>Construction of Pro-base road</td> </tr> <tr> <td>Insufficient drinking water resources</td> <td>Install new water filtration system in workers rest room</td> </tr> <tr> <td>Dirty drinking water in mill</td> <td>Install new water filtration system</td> </tr> </tbody> </table>	Category	Issue	Plan	Welfare/ Social	Location of workers housing too close to effluent ponds	Relocate to safer and better location	Insufficient workers housing	Additional housing construction	Bad road surface	Construction of Pro-base road	Insufficient drinking water resources	Install new water filtration system in workers rest room	Dirty drinking water in mill	Install new water filtration system	Complied
Category	Issue	Plan															
Welfare/ Social	Location of workers housing too close to effluent ponds	Relocate to safer and better location															
	Insufficient workers housing	Additional housing construction															
	Bad road surface	Construction of Pro-base road															
	Insufficient drinking water resources	Install new water filtration system in workers rest room															
	Dirty drinking water in mill	Install new water filtration system															

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings			Compliance
		Operation/ Environmental	Rundown overhead water tank and structure DOE License and Clean Air Regulations for boiler smoke Overflow of effluent during heavy rain	Front-end upgrading works including new water tank and structure with relocation of office building Electrostatic Precipitators (ESP) construction Increased capacity of POME discharge tractors	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	Kemaman Palm Oil Mill are in the midst of construction of methane capture (biogas) plant for its POME treatment system in Kemaman Palm Oil Mill. This system will be able to utilize the use of renewable energy further. The construction expected to be completed by 2022 was delayed due to COVID-19 MCO.			Complied
4.2 Principle 2: Transparency					
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements					
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	Kemaman Palm Oil Mill has maintained records of request and response, land titles, environmental and OSH plans etc. relating to environmental and social issues, plans for pollution prevention, complaints and grievances records that make available upon request.			Complied
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or	Documents that specified in the standard are publicly available such as social and environment impact assessment, action plan, meeting minutes and audit reports.			Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	social outcomes. - Major compliance -	Besides, policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view. As per Memorandum by Group Chief Executive Officer; Ref. # TDM/CC/01; Date: 8/4/2018 from Corporate Communication Department to Heads of Subsidiaries, Heads of Department and All Staff of TDM Berhad Group on Sustainability Policies for the new policies approved by the Board on 27/3/2018 as following: <ul style="list-style-type: none"> - Sustainability Policy - Environment & Biodiversity Policy - Social & Humanity Policy - Occupational safety & health Policy - Gender & Diversity Policy Information relevant to RSPO Criteria and stakeholders also shared through the website: http://www.tdemberhad.com.my/#2 .	
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 -	Procedures available as per Stakeholder Social Issue (Requests/Complaints/Grievances) Handling Flow-Chart with use of Communication form; Rev. 1 TDMP 2017 between stakeholder and TDMP. There's also procedure of external communication for handling of specific external stakeholders. Records of request for information and responses are maintained as per sample as following: <ul style="list-style-type: none"> - Kemaman Palm Oil Mill inspection visit records by DOSH; Visit date: 10/6/2020 	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		- Kemaman Palm Oil Mill DOE field citation form # T010F000025; Visit date: 18/5/2020	
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 Mill Manager was appointed as the management officials as per Letter of " <i>Perlantikan Sebagai Wakil Syarikat Bagi Mengendalikan Isu Sosial Dengan Pihak Luar Di Peringkat Ladang/Kilang</i> " from Group Senior Human Resource Manager; ref. # TDMP/HR/PSN-GEN/RSP0; dated 2/9/2014. Appointed management representative for Kemaman Palm Oil Mill, Tebak Estate, Air Putih Estate, Jernih Estate is Estate Manager as per letter ref. # TDMP/HR-GEN(MSP0/RSP0); Date: 17/10/2021 from Head of Human Resource TDM Plantation.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	Stakeholder list was developed where all the affected stakeholders were included into the list such as government authorities, local communities, contractors and supplier, neighboring and schools etc. for the mill. Sampled records maintained as following: <ul style="list-style-type: none">- Register of stakeholders 2021 list- External communications letters received- Communication of workers and contractors' form- DOE field citation records- DOSH visit books List available as per list of stakeholders Kemaman Palm Oil Mill 2021. Consultation done via online survey form by Kemaman Palm Oil Mill through email dated 7/10/2021 with stakeholders such as local communities, managers from other estates, workers' representatives, school representatives and etc. Issues raised during the stakeholders was explained in the online survey	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		and unresolved issue has incorporated into the Social Action Plan to monitor. No negative feedback received.	
Criterion 4.2.3 – Traceability			
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 -	Procedures are controlled documents and controlled and updated by Kemaman Palm Oil Mill (MSPO Traceability SOP; TDM/KPOM/01; Rev. KPOM-01/2017; dated 1/8/2017). These procedures are current and include all elements of the traceability for controlling the receipt, sale, and dispatch of palm products.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Regular inspections conducted including internal audit based on MSPO Internal Audit SOP; TDMP/01; Rev. TDMP-01/2017; Date: 1/8/2017. Latest internal audit was conducted by sustainability personnel from HQ on 14/10/2021 for Kemaman Palm Oil Mill while for Tebak Estate 22/9/2021; Jernih Estate 27/9/2021; Pelantoh Estate 27/9/2021; Air Putih 4/10/2021. Sighted records of South Zone Sustainability Audit Report for Kemaman Palm Oil Mill dated on 17/10/2021 indicated no non-compliance on traceability.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The Mill Compliance Executive, Mr. Wan Ahmad Amilin Wan Ngah was appointed as the person in-charge to implement and maintain traceability system as per letter of appointment dated 10/9/2019. Interview with the Mill Manager confirmed his knowledge of the MSPO traceability requirements.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Records maintained available as per sample sighted as following: - Daily Process Report; Date: 24/10/2021; Daily FFB received: 758.71 mt; OER: 20.04%; KER: 4.78%; CPO Stock: 445.54 mt; PK stock: 78.00 mt	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - FFB received docket # P0285828; Supplier: Gajah Mati Estate; Date: 2/3/2021; Net weight: 34,200 kg - FFB received docket # P0285838; Supplier: Pelantoh Estate; Date: 2/3/2021; Net weight: 9,130 kg - CPO delivery docket # S0118470; Buyer: Hup Lee Oil Mill Sdn. Bhd.; Date: 19/8/2021; Net weight: 44,330 kg - CPO delivery docket # S0119346; Buyer: Ngo Chew Hong Oils & Fats (M) Sdn. Bhd.; Date: 19/9/2021; Net weight: 42,470 kg 	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Compliance to each applicable law and regulation is monitored by the operating units. Sighted the sampled evidence of compliancy to the regulation as follows:</p> <ul style="list-style-type: none"> - MPOB license no. 500041904000 valid till 31/03/2022 - DOE license no. 004055 with compliance schedule no. AS(B)T:31/152/000/001 valid till 30/06/2022 - DOE contravene license no. 004082 with compliance license no. JPLP(UB)/2021/004082 valid till 31/12/2021 - Scheduled control goods permit for storage of diesel no. T001757 valid till 10/05/2024 - Private installation license no. 2020/02728 valid till 21/11/2021 - Competent Person: 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> ○ CePSWaM certificate no. CePSWaM/209338 ○ CePPOME certificate no. CePPOME/00228 	
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established SOP to identify, access, tracking changes and monitoring the compliance with legal requirements that were applicable to them documented in Standard Operating Procedure: Legal and Other Requirements. Refer document no. TDM/KPOM/01, rev. 01 dated 01/05/2011. The legal register shall be evaluated at least once a year.</p> <p>The mill has listed all applicable legal and other requirements in Legal Register 2021. Latest review was conducted 20/09/2021.</p>	Complied
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The mill has listed all applicable legal and other requirements in Legal Register 2021. Latest review and update was conducted 20/09/2021. Among the latest update to the applicable law and other regulation as follows:</p> <ol style="list-style-type: none"> 1. Movement Control Order 2020 for COVID-19 2. Min wages order 2020 rev 15/01/2020 3. Workers Min Std Housing Amenities (Amendment) Act 1990 revised on 01/6/2020 4. FMA 1089 (Noise exposure) Revocation 2019 	Complied
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>The Legal and Secretarial Department will track any changes to the applicable legal and other requirements and update the Sustainability Team. The Sustainability Team will communicate the new update with operating units through memorandum, letter or emails. The mill has appointed the Compliance Executive as person responsible for compliance legal and other requirement</p>	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		as per appointment letter dated 23/02/2021 signed by the Mill Manager. Refer letter no. TDMP/LRR/001/2021.	
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. - Major compliance -	Milling activities do not diminish the land use rights of other users. Ownership documents sighted i.e. State Title; Ownership # 6521; Lot #7663; Area: 58.7685 ha; District: Kuala Terengganu: Mukim Belara; Date: 18/11/1976; Owner: Perbadanan Memajukan Iktisad Negeri Terengganu; Leasing to: Kumpulan Ladang-ladang Terengganu Sdn. Bhd.; Period: 1/1/1973 – 31/12/2017. Sighted too the Management Agreement as following: <ul style="list-style-type: none"> - Between Kumpulan Ladang-ladang Terengganu Sdn. Bhd. and TDM Plantation Sdn. Bhd. dated 20/7/2016 - Between TDM Plantation Sdn. Bhd. and TDM Berhad dated 20/7/2016 - Between Kumpulan Ladang-ladang Terengganu Sdn. Bhd. and TDM Berhad dated 1/9/2012 	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	The mill are on government lease land and they hold copies of Land Titles. Original land title document is kept at head office while a copy of it is available at estate’s office. At least four of the estates within Kemaman Palm Oil Mill complex mainly Tebak, Jernih, Air Putih and Pelantoh shared their land titles with demarcation only with individual estate’s field map among each other. These mainly for estates located within mukim Tebak and Bandi which is also the area for mill location.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Kemaman Palm Oil Mill does not have a copy of land title by itself but is located within Pelantoh Estate that has legal ownership of the land and is an Operating Unit of TDM Plantation Sdn Bhd.	
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The mill boundary in the Pelantoh Estate is well maintained and marked by perimeter fencing. Boundaries in all visited estates demarcated with either boundary drain or pegs on top of the original boundary stones. Sighted a sample boundary stone # 141 for Air Putih Estate boundary with Kampung Air Puth.	Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute in TDM Kemaman complex at the time of audit. The land belongs to TDM and land ownership documents verified.	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. - Major compliance -	No lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Not Applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	No lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Not Applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.	No lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	customary rights are understood and not being threatened or reduced.	
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	<p>Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>Implementation was as per TDM Plantation Sdn. Bhd. Social Impact Assessment (SIA) Kompleks Kemaman; A report prepared by SRA Consultancy, Senawang, Negeri Sembilan for TDM dated November 2011 was made available during audit.</p> <p>Based on the assessment, action plan was established on annual basis as per sighted SIA Action Plan as at 2020/2021; Date review: 1/3/2021.</p> <p>Sighted area of concerns including housing and infrastructure with social impact identified were poor facilities and infrastructure, housing not complying with legal requirement, poor waste dumpsite and etc. Progress of improvement plan shown most of the areas of concerns have been completed such as issues on poor drainage and septic tank system at line site while some were done continuously on annual basis for improvement plan such as construction of new workers quarters.</p>	Complied
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>A system for dealing with complaints and grievances were established and documented as a Flowchart on Handling Social Issue and Complaint/ Grievance Procedure. Any issue raised by</p>	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		stakeholders will be discuss within 2 weeks for the first meeting and issues to be resolved within 28 working days.	
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	Based on the records of Complaint Logbooks in mill, it was verified that all complaints and action able to be resolved in effective, timely and appropriate manner. Verification of resolution signatures by Officer, Assistant Manager and Manager were sighted.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Complaint Logbook for Linesite Repair and Complaint/ Request form was established and implemented. No external stakeholders were recorded related on complaint and grievances.	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	Interview with internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and they were briefed by the management during stakeholder meeting.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	The complaint logbook/ complaint files that recorded complaints and solutions since at least January 2014 was maintained available to affected stakeholders upon request.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	Contributions were made as part of Continuous Improvement Plan FY2020/2021 in all estates and mill. Records for Air Putih Estate contribution sighted as per sample as following: - Provision of estate lorry use for Kampung Teladas road paving works; Date: 6/1/2021	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Provision of estate van use for SK Ayer Putih school children program transport; Date: 24/3/2021 - Foreign workers vaccination programs for foreign workers at Unisza Kuala Terengganu; Date: 2/9/2021 <p>Other contributions also sighted as per sample as following:</p> <ul style="list-style-type: none"> - Kemaman Palm Oil Mill: Contribution of food basket to all employees during EMCO; 5/8/2021 - Pelantoh Estate: Contribution of Grass Cutting Tractor for SK Padang Kubu football field grass cutting; 23/5/2021 - Tebak Estate: Contribution to joint program of malaria & filariasis control and prevention through mass blood survey; 27/9/2021 	
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>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.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established Safety and Health Policy dated 01/04/2021 signed by the CEO. In the policy stated the company commitment to:</p> <ul style="list-style-type: none"> i. Provide continuous training and development in order to increase awareness among the employees ii. Instilling a culture of safety and health among employees iii. Complied with safety and health legal requirements, guidelines and best practices iv. Made safety and health factors as main element to develop and run the company operations 	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance
	<p>v. Improve the safety and health management base on Occupational Safety and Health Act 1994 and Factory and Machinery Act 1967.</p> <p>The mill has established OSH Plan FY 2021. The plan cover on OSH legal compliance, emergency response plan, OSH management system, risk management and safety committee. Sighted the implementation as follows:</p> <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The mill send workers involved in chemical handling for medical surveillance on annually basis. Latest medical surveillance was conducted on 23 - 24/03/2021. 12 workers was send for surveillance and found fit to work as chemical handlers. 2. The mill conducted LEV monitoring on weekly basis. reviewed the monitoring records dated 06/10/2021, 13/10/2021, 08/09/2021, 18/09/2021, 23/08/2021 and 30/08/2021 3. The mill monitored the first aid on monthly basis. reviewed the monitoring records dated 16/09/2021, 23/06/2021 and 26/05/2021 4. Latest annual audiometric test by Hygiene Tech with reg. no HQ/20/JHII/00/0029 on 19/04/2021. 5. The mill conducted monitoring/inspection for all firefighting equipment on monthly basis. Reviewed the monitoring records dated 07/09/2021, 05/08/2021, 15/06/2021 and 03/05/2021. 	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.4.2 The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). 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. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements. 	<ul style="list-style-type: none"> a) TDM Plantation Sdn Bhd has established Safety and Health Policy dated 01/04/2021 signed by the CEO. The policy was communicated to all workers through morning briefing, training and displayed on notice board. Reviewed the latest Safety and Health Policy training dated 26/01/2021. b) TDM Plantation Sdn Bhd has established the SOP for risk assessment to identify H&S issue documented in the Standard Operating Procedure (HIRARC) edition TDMP/01, rev. no. TDMP-02/2018 dated 22/10/2018. The risk assessment process has been describe in the SOP accordingly. As per SOP, HIRARC review to be conducted as follows: <ul style="list-style-type: none"> i. At least once a year ii. Immediately whenever there is an accident, near miss or dangerous occurrence iii. When there is changes in the work method iv. When new machines and technology are introduced v. When there is new activity, process or operations The mill has conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and Risk Control (HIRARC) and chemical Hazard Risk Assessment. The assessment covers all main operations and support operations. The HIRARC was reviewed at minimum once a year, if accident occur or changes on the operation. The latest HIRARC review was conducted as follows: 	<p>Complied</p>

Criterion / Indicator		Assessment Findings		Compliance				
	g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance -	<table border="1"> <thead> <tr> <th>Operating Unit</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Kemaman Palm Oil Mill</td> <td>23/09/2021 on Vehicle Driver due to accident occur on 21/09/2021</td> </tr> </tbody> </table>		Operating Unit	Date	Kemaman Palm Oil Mill	23/09/2021 on Vehicle Driver due to accident occur on 21/09/2021	
		Operating Unit	Date					
		Kemaman Palm Oil Mill	23/09/2021 on Vehicle Driver due to accident occur on 21/09/2021					
c) The chemical handlers have been given training regarding the usage safety and health issue and proper way for chemical application. Reviewed the training records as follows: 1. Water treatment for boiler and water treatment plant Chemical handling training dated 05/04/2021 2. Scheduled waste management training dated 09/03/2021								
d) The management provide appropriate PPE to the employee's base on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE issuance was recorded in ' <i>Borang Penyerahan Peralatan kerja dan Pengambilan Barang PPE</i> '. Noted during interview at the loading ramp, workshop, boiler and laboratory, the workers were provided with adequate PPE. Sighted the PPE issuance records for workers as follows: 1. KM00075 2. KM1400200 3. KM00083 4. KM0900145 5. KM0900146								

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance
	<p>e) TDM Plantation Sdn Bhd has established the Agrochemical Management Policy dated 01/04/2021 signed by the CEO. In the policy stated the company commitment to enhance the agrochemical handling that are hazardous to health includes storage, handling, transporting, usage and disposal.</p> <p>TDM Plantation Sdn Bhd has established SOP for Chemical Handling. Refer document no. TDMP-01/2017 dated 01/09/2017.</p> <p>f) The mill manager has been appointed as person responsible for safety and health cum chairman for safety and health committee in as per appointment letter signed by the CEO.</p> <p>The mill management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter signed by the Mill Manager.</p> <p>g) The mill management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter signed by the Mill Manager.</p> <p>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 matters arising, OSH objective and program, compliance to legal and requirement, Accident statistic and report, external and internal compliant, training and competency, workplace inspection report and other matters. Reviewed minutes meeting conducted on 21/03/2021 and 23/09/2021.</p>	

Criterion / Indicator		Assessment Findings	Compliance				
		<p>h) TDM Plantation Sdn Bhd has established the SOP for Accident and emergency procedures documented in the Standard Operating Procedure – Emergency Preparedness and Response edition TDM/01, rev. no. TDMP-02/2018 dated 01/01/2018. In the SOP, the emergency plan and ERT to be activated according to the emergency situations as follows:</p> <ul style="list-style-type: none"> i. Fig. 4.0 – Event of environmental and OSH emergencies including accident/incident ii. Fig. 4.4a – Event of fire iii. Fig. 4.4b – Event of Explosion iv. Fig. 4.4c – Event of Oil Spillage v. Fig. 4.4d – Event of Effluent Spillage (mills). <p>The Emergency Response Plan Flow Chart has been displayed at strategic places in the mill and estates.</p> <p>The mill has established Emergency response team. Training has been conducted regularly to ensure the awareness on the ERP. Reviewed the training records as per Fire drill training dated 20/06/2021</p>					
		<p>i) The mill provided first aid kit/box and located in designated places or assigned to competent first aider. The operating units has also established an information on the location of first aid box, name and contact no. of the assigned first aider and communicated through briefing, training and displayed on notice board. First aid kit was monitored on timely basis as follows:</p> <table border="1"> <tr> <td>Kemaman Palm Oil Mill</td> <td>16/10/2021</td> <td>16/09/2021</td> <td>25/08/2021</td> </tr> </table>	Kemaman Palm Oil Mill	16/10/2021	16/09/2021	25/08/2021	
Kemaman Palm Oil Mill	16/10/2021	16/09/2021	25/08/2021				

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance						
		<p>The mill continuously provided training to ensure the competency for the first aider.</p> <p>The mill continuously provided training to ensure the competency for the first aider. Sighted the training records as per First Aid training dated 15/03/2021 and 04/07/2021</p> <p>Noted during interview with workers, the workers were aware regarding the location of firefighting equipment, first aid box and the competent first aider in the mill.</p> <p>j) The mill maintains the records of accidents including JKPP 6 forms reported to DOE, medical leaves certificates, accidents investigations reports and HIRARC review. The accidents occurrence was reported to the Headquarters through Immediate Notification Records and Detail Investigation Reports and DOSH by submitting the JKPP 6 form through MyKKP system.</p> <p>Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2020 as reported to DOSH as follows:</p> <table border="1"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Kemaman Palm Oil Mill</td> <td>2</td> <td>24</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	Kemaman Palm Oil Mill	2	24	
Operating units	Accident Cases	LTA							
Kemaman Palm Oil Mill	2	24							
Criterion 4.4.5: Employment conditions									
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy	On group level, policy for the implementation of MSP0 established as TDM Berhad Sustainability Policy; approved by the BOD and signed by TDM Plantation Sdn. Bhd. CEO on 1/4/2021.	Complied						

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	shall be signed by the top management and communicated to the employees. - Major compliance -	Briefing of the policies were provided to the workers as per records of internal training report Briefing of Company Policies including MSPO Policy; Date 25/8/2021 for Air Putih Estate workers by all employees. The policies were displayed at the notice board outside the office.	
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 -	On group level, policy for the implementation of MSPO established as TDM Berhad Sustainability Policy; approved by the BOD and signed by TDM Plantation Sdn. Bhd. CEO on 1/4/2021. The policy stated that the management was committed to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality and gender etc. Interviewed with workers confirmed that no discrimination was practice by the management. Briefing of the policies were provided to the workers as per records of internal training report Briefing of Company Policies including MSPO Policy; Date 25/8/2021 for all employees.	Complied
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 -	The management have ensured that employees' pay and conditions meet applicable legal requirements i.e. National Minimum Wages Order 2020 in line with MAPA Circular No. 56/2021; Date: 23/8/2021; Oil Palm MAPA/NUPW on the Wages of Harvesters, Harvesting Kanganies, Loaders and "Other Loaders on Oil Palm Estates, 2019; Wage Rate September 2021 & Palm Oil Mill MAPA/NUPW Palm Oil Mill Employees Agreement, 2019; Wage Rates – September 2021. Sighted payslips for Kemaman Palm Oil Mill workers samples as following: <ul style="list-style-type: none"> - Employee # KM00050; Post: Process Shift Worker; Male - Employee # KM00052; Post: Process Shift Worker; Male 	Complied

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Employee # KM0900141; Post: General Worker; Female - Employee # KM1800217; Post: Workshop Fitter; Male - Employee # KM0900147; Post: Security Guard; Male - Employee # KM0900139; Post: Lab Worker; Female - Employee # KM00093; Post: Organic Fertilizer Worker; Female <p>All samples shown employees received minimum wages as per legal requirements.</p>	
4.4.5.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Management ensured employees of contractors are paid based on National Minimum Wages Order 2020 as per MAPA Circular No. 56/2021; Date: 23/8/2021; Oil Palm MAPA/NUPW on the Wages of Harvesters, Harvesting Kangannies, Loaders and "Other Loaders on Oil Palm Estates, 2019; Wage Rate September 2021 & Palm Oil Mill MAPA/NUPW Palm Oil Mill Employees Agreement, 2019; Wage Rates – September 2021.</p>	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>Records of employee analysis summary containing information of full names, gender, date of birth, start work date, job description, wages and employee personal ID sighted available for the latest updated as of September 2021.</p>	Complied
4.4.5.6	<p>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.</p> <p>- Major compliance -</p>	<p>Fair contracts have been signed by both employee and employer with both kept a copy each as per sighted for sample workers in indicator 4.4.5.3 above.</p>	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
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 -	Kemaman Palm Oil Mill established a time recording system using Check Roll Book for all employees at different station. The working hours for all employees has been clearly documented in the Check Roll Book as well as their pay slip under OT section to ensure transparent for both employees and employer. Time recording system has been carried out manually on daily basis. The documented working hours available in the daily check roll records.	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 -	Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Employment Act 1955. As at current status, there was none has crossed 80 hours of overtime. Verified the payslips, the payment and calculation of overt time well distributed. The overtime rate after 8 hours daily rated is as following: - Sun - Thu – daily rated / 8 hours x 1.5 - Friday - daily rated / 8 hours x 2.0 - Public holiday – daily rated / 8 hours x 3.0	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 -	Wages and overtime payment documented found consistent with legal regulations and collective agreements as per sample sighted in indicator 4.4.5.3 above.	Complied
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.	Other forms of social benefits for workers including the insurance as following: - Local workers & staff: Social Security Organization (SOC SO) Monthly Contribution sighted as per sample latest Form 8A; for the monthly contribution for the month of November 2018	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	- Foreign workers: Foreign Workers Compensation Scheme Policy;	
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 -	On-site living quarters are provided and visit to the housing area/line site showed quarters are decently habitable and equipped with basic amenities of free electricity and water supply including other facilities such as mosque, community hall, sundry store, canteen, children’s crèche and football field.	Complied
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	TDM Plantation Sdn Bhd has developed Gender Policy and Reproductive Policy dated 1/4/2021 which signed by CEO. The management will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment, religious, gender, country of origin and etc. They will ensure that the rights of women will be protected.	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 -	TDM Plantation Sdn Bhd has developed Gender Policy and Reproductive Policy dated 1/4/2021 which signed by CEO. The management will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment, religious, gender, country of origin and etc. They will ensure that the rights of women will be protected. Sighted the latest employee representative meeting as per Minutes of Meeting Co-operative Board Council; 2 nd Session 2020/2021; Date: 7/4/2021.	Complied
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	TDM Plantation Sdn Bhd has developed Child Protection Policy dated 1/4/2021 which signed by CEO. The company will not recruit or exploit any individual less than 16 years old to work in the company. Seen the employee master list confirmed that all the workers were above 18 years old. Besides, interviewed with	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		workers and stakeholders confirmed that TDM Plantation Sdn Bhd did not recruit any workers less than 18 years old.	
Criterion 4.4.6: Training and competency			
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	The operating units maintained the training records conducted. Reviewed the training records as follows: 1. First Aid training dated 15/03/2021 and 04/07/2021 2. Fire drill training dated 20/06/2021 3. Water treatment for boiler and water treatment plant Chemical handling training dated 05/04/2021 4. FFB Grading training dated 11/02/2021 5. PPE awareness training dated 05/01/2021 6. RSPO and MSPO supply chain traceability training dated 15/03/2021 7. Safety and sustainability briefing to contractors dated 02/03/2021 8. Scheduled waste management training dated 09/03/2021 9. Legal requirement register refresher training dated 16/09/2021 10.SOP for COVID-19 briefing dated 08/06/2021	Complied
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	The mill visited conducted training need analysis to identify training required for the employee and documented in Training Matrix FY 2021. The mill has also conducted assessment to the training attendees to assess the training efficiency.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.6.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The mill visited has established training schedule FY 2021 base on training need analysis conducted. The training program covers Policy, operation and OSH/others.</p> <p>The program involve the executive, staff/field supervisor, workers and contractors. The identified training was programmed throughout the year.</p>	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>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.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established Biodiversity and Environmental Policy dated 01/04/2021 signed by the CEO. In the policy stated the company commitment to:</p> <ul style="list-style-type: none"> i) Complied with all statutory requirement regarding biodiversity and environmental ii) Creating, maintaining and continuous improvement of sustainable plantation management iii) Eliminate potential adverse effects on the environment and biodiversity that may arise from plantation activities iv) Provide an effective work system subject to Environmental Quality Act 1974 v) Ensure zero burning is always given priority as stipulated in the Environmental Quality (Declared Activities) (Open Burning) Order 2003 <p>The policy was communicated to the employee through displayed at notice board around the mill, training and morning briefing. Reviewed the training records as follows:</p>	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		1. Slope protection and buffer zone policy training dated 10/03/2021 2. Biodiversity and environmental policy training dated 05/01/2021	
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 -	Kemaman Palm Oil Mill conducted aspect and impacts analysis of all operations as per SOP established and documented in Standard Operating Procedure – Environmental Aspects/Impacts Evaluation date 01/11/2017, edition TDMP/01 rev. TDMP – 01/2017. The management review the environmental aspects impacts on annually basis or if there is changes in the legal or mill operation. Latest review on the environmental aspect impact was conducted on 01/02/2021.	Complied
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 -	Based on the environmental aspects and impacts conducted, Kemaman Palm Oil Mill established action plan documented in the Environmental Improvement Plan/Pollution Prevention Plan and continuous improvement. Latest review was conducted 10/09/2021. Among the plan established for 2021 as follows: 1. Kemaman Palm Oil Mill is in progress to construct the Electrostatic Precipitators (ESP) to comply with DOE regulation. The project targeted to be completed by 2021. Reviewed daily progress report for ESP dated 19/10 2021. The ESP is expected to be commissioning in January 2022. 2. Kemaman Palm Oil Mill is in progress to build Biogas Plant to capture Methane gas to reduce the GHG emission. The project targeted to be completed by 2022. Reviewed the daily	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>progress for biogas project dated 23/10/2021. The biogas plant Initial Operation Date expected on 10/11/2021</p> <p>3. To comply with DOE regulation on EFB management, the plan to build proper dumping area to avoid any leakage of leachate. The project was included into 2022 Capital Expenditure.</p>	
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>Program to promote the positive impacts was documented in the Continuous Improvement Plan. Sighted the improvement plan as follows:</p> <ul style="list-style-type: none"> - To install ESP and hire competent person - To build bio-gas plant and hire competent person - To build EFB dumping area 	Complied
4.5.1.5	<p>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.</p> <p>- Major compliance -</p>	<p>Kemaman Palm Oil Mill continuously provided training to the employee to ensure the understanding on the environmental policy, objectives and management plans. Noted during interview, the understanding on the environmental issue were acceptable.</p> <p>The sampled of training conducted as per criteria 4.4.6.1 above.</p>	Complied
4.5.1.6	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>The management has established Environmental Performance Monitoring Committee. The committee consist of representative from the employer and employee. The committee conducted meeting on twice a year.</p> <p>Among the issue discussed during the meeting Environmental Sustainability Objective and Program, Compliance to Legal and Other Requirement, Environmental Control Tools, Environmental License Application and Training and Competency. Reviewed the minutes meeting dated 23/06/2021 and 21/03/2021.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																																									
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																																												
4.5.2.1 Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance -	The monitoring of non-renewable energy usage was conducted on monthly basis. Reviewed the records as follows: <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">Diesel/FFB</th> </tr> <tr> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>1.78</td><td>1.65</td></tr> <tr><td>Feb</td><td>1.41</td><td>2.01</td></tr> <tr><td>Mac</td><td>1.06</td><td>1.95</td></tr> <tr><td>Apr</td><td>1.03</td><td>2.06</td></tr> <tr><td>May</td><td>2.42</td><td>1.69</td></tr> <tr><td>Jun</td><td>1.38</td><td>1.33</td></tr> <tr><td>July</td><td>1.00</td><td>2.21</td></tr> <tr><td>Aug</td><td>1.10</td><td>1.35</td></tr> <tr><td>Sep</td><td>1.05</td><td>NA</td></tr> <tr><td>Oct</td><td>1.23</td><td>NA</td></tr> <tr><td>Nov</td><td>0.75</td><td>NA</td></tr> <tr><td>Dec</td><td>1.06</td><td>NA</td></tr> </tbody> </table>		Month	Diesel/FFB		2020	2021	Jan	1.78	1.65	Feb	1.41	2.01	Mac	1.06	1.95	Apr	1.03	2.06	May	2.42	1.69	Jun	1.38	1.33	July	1.00	2.21	Aug	1.10	1.35	Sep	1.05	NA	Oct	1.23	NA	Nov	0.75	NA	Dec	1.06	NA	Complied
Month	Diesel/FFB																																											
	2020	2021																																										
Jan	1.78	1.65																																										
Feb	1.41	2.01																																										
Mac	1.06	1.95																																										
Apr	1.03	2.06																																										
May	2.42	1.69																																										
Jun	1.38	1.33																																										
July	1.00	2.21																																										
Aug	1.10	1.35																																										
Sep	1.05	NA																																										
Oct	1.23	NA																																										
Nov	0.75	NA																																										
Dec	1.06	NA																																										
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 -	Kemaman Palm Oil Mill has established baseline for diesel usage based on 3 years diesel consumption trend. 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.		Complied																																									

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance								
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 2021 as follows: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Month</th> <th>Shell (MT)</th> <th>Fiber (MT)</th> </tr> </thead> <tbody> <tr> <td>Todate as at Sept 2021</td> <td>6,840.52</td> <td>14,407</td> </tr> </tbody> </table>	Month	Shell (MT)	Fiber (MT)	Todate as at Sept 2021	6,840.52	14,407	Complied		
Month	Shell (MT)	Fiber (MT)									
Todate as at Sept 2021	6,840.52	14,407									
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 -	Kemaman Palm Oil Mill have identified the waste products and source pollution generated in the estates and mill. The waste are categorized as follows: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Type</th> <th>Item Description</th> </tr> </thead> <tbody> <tr> <td>Scheduled Waste</td> <td>SW 102 – Waste of lead acid batteries SW 110 – Fluorescent tube/lamp SW 305 – spent lubricant SW 410 – rags, plastics, papers, contaminated filters SW 322 – Waste of non-halogenated organic SW 409 – empty chemical containers</td> </tr> <tr> <td>Domestic waste</td> <td>Rubbish</td> </tr> <tr> <td>Industrial waste</td> <td>Scrap metal EFB POME Fiber Ash Boiler Shell</td> </tr> </tbody> </table>	Type	Item Description	Scheduled Waste	SW 102 – Waste of lead acid batteries SW 110 – Fluorescent tube/lamp SW 305 – spent lubricant SW 410 – rags, plastics, papers, contaminated filters SW 322 – Waste of non-halogenated organic SW 409 – empty chemical containers	Domestic waste	Rubbish	Industrial waste	Scrap metal EFB POME Fiber Ash Boiler Shell	Complied
Type	Item Description										
Scheduled Waste	SW 102 – Waste of lead acid batteries SW 110 – Fluorescent tube/lamp SW 305 – spent lubricant SW 410 – rags, plastics, papers, contaminated filters SW 322 – Waste of non-halogenated organic SW 409 – empty chemical containers										
Domestic waste	Rubbish										
Industrial waste	Scrap metal EFB POME Fiber Ash Boiler Shell										

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance						
<p>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:</p> <ul style="list-style-type: none"> a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. <p>- Major compliance -</p>	<p>Kemaman Palm Oil Mill has established management Plan base on the identification and source of pollutions and the documented in Waste management Plan FY 2021 and were available for review. In the management plan stated the type of waste, description, source of pollution, action to be taken and person responsible.</p> <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> Shell and fiber were used as boiler fuel. Reviewed the records FY 2021 as follows: <table border="1" data-bbox="1128 786 1823 855"> <thead> <tr> <th>Month</th> <th>Shell (MT)</th> <th>Fiber (MT)</th> </tr> </thead> <tbody> <tr> <td>Todate as at Sept 2021</td> <td>6,840.52</td> <td>14,407</td> </tr> </tbody> </table> Kemaman Palm Oil Mill maintains the inventory records of the Scheduled Waste generated and reported to DOE through ESWISS. Reviewed the Fifth Scheduled: Inventory of Scheduled Waste for the month of July, August, September and October 2021. The EFB were disposed by filed mulching application by the sister estate and send to the bio compost plant. Reviewed the records April 2021 at 452.93 ton, Mei 2021 at 514.99 ton and June 2021 at 690.11 ton 	Month	Shell (MT)	Fiber (MT)	Todate as at Sept 2021	6,840.52	14,407	<p>Complied</p>
Month	Shell (MT)	Fiber (MT)						
Todate as at Sept 2021	6,840.52	14,407						
<p>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,</p>	<p>TDM Plantation Sdn Bhd has established SOP for handling scheduled waste and documented in Standard Operating procedure – Procedure for handling schedule waste dated 1/11/2008, edition TDMP/02 rev. TDMP – 02/2017.</p>	<p>Complied</p>						

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	2005 - Major compliance -	<p>Kemaman Palm Oil Mill also has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p> <p>Kemaman Palm Oil Mill maintains the inventory records of the Scheduled Waste generated and reported to DOE through ESWISS. Reviewed the Fifth Scheduled: Inventory of Scheduled Waste for the month of July, August, September and October 2021.</p> <p>Inventory for all scheduled waste generated were recorded and reported to DOE through E-SWISS. Sighted the sampled scheduled waste disposal records:</p> <ol style="list-style-type: none"> 1. 06/09/2021, SW 110, C/N no. 2021091212NKSCYV 2. 06/09/2021, SW 322, C/N no. 2021091212I3R7VS 3. 06/09/2021, SW 305, C/N no. 20210912110G2PY5 4. 12/09/2021, SW 409, C/N no. 202109121229WLK4 5. 12/09/2021, SW 410, C/N no. 2021091212ZTW9BM 	
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Domestic waste was collected by Kemaman Palm Oil Mill and disposed at the designated landfill at sister estate. Reviewed the records of domestic waste collection dated 01/09/2021, 03/09/2021, 21/09/2021, 24/09/2021 and 17/09/2021.	Complied
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 -	Kemaman Palm Oil 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	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling.	
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	<p>Kemaman Palm Oil 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.</p> <p>Sighted the sampled if stack sampling conducted as follows:</p> <p>1st sampling FY 2020 Report no.: L-GB-TC2007CTP-0387 Date sampled: 20/7/2020 Result: 147.7 mg/m³ @ 12.0% CO₂ lower than the allowable emission of 150 mg/m³</p> <p>1st sampling FY 2021 Report no.: L-GB-TC2102CTP-0436 Date sampled: 24/02/2021 Result: 116.30 mg/m³ @ 12.0% CO₂ lower than the allowable emission of 400 mg/m³</p> <p>2nd sampling FY 2021 Report no.: L-GB-TC2109CTP-0424 Date sampled: 27/09/2021</p>	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance																								
		Result: 349.70 mg/m ³ @ 12.0% CO ₂ lower than the allowable emission of 400 mg/m ³																									
4.5.4.3	<p>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.</p> <p>- Major compliance -</p>	<p>Treated POME discharge was regularly monitored as prescribed under Compliance Schedule License no. 003180. Limit of Biochemical Oxygen Demand (BOD) discharge is 100 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:</p> <p>3rd quarter (report date: 14/10/2021)</p> <table border="1"> <thead> <tr> <th></th> <th>Jul</th> <th>Aug</th> <th>Sep</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.00</td> <td>7.90</td> <td>8.20</td> </tr> <tr> <td>BOD</td> <td>0.00</td> <td>40.00</td> <td>54.00</td> </tr> </tbody> </table> <p>2nd quarter (report date: 07/07/2021)</p> <table border="1"> <thead> <tr> <th></th> <th>Apr</th> <th>May</th> <th>Jun</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>9.07</td> <td>8.30</td> <td>7.60</td> </tr> <tr> <td>BOD</td> <td>39.00</td> <td>83.00</td> <td>50.00</td> </tr> </tbody> </table> <p>The effluent analysis confirms with condition prescribed under Compliance Schedule.</p>		Jul	Aug	Sep	pH	8.00	7.90	8.20	BOD	0.00	40.00	54.00		Apr	May	Jun	pH	9.07	8.30	7.60	BOD	39.00	83.00	50.00	Complied
	Jul	Aug	Sep																								
pH	8.00	7.90	8.20																								
BOD	0.00	40.00	54.00																								
	Apr	May	Jun																								
pH	9.07	8.30	7.60																								
BOD	39.00	83.00	50.00																								
Criterion 4.5.5: Natural water resources																											
4.5.5.1	<p>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:</p> <p>a) Assessment of water usage and sources.</p>	<p>Kemaman Palm Oil Mill has established water management Plan and documented in Action Plan to reduce freshwater usage. In the plan stated the, areas of concern, action plan, person responsible and time frame. Latest review was conducted on February 2021.</p> <p>Among the plan established as follows:</p>	Complied																								

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance																								
	<p>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill’s current activities.</p> <p>c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>- Major compliance -</p>	<ul style="list-style-type: none"> - Large containers to be placed at strategic locations to collect water - Rainwater to be used to wash heavy machineries and watering plant - Install flowmeter - Upgrade front end – less washing frequency at ramp, marshalling <p>Reviewed the implementation of the management plan as follows:</p> <p>Kemaman Palm Oil Mill maintains the records of water usage in the mill. Reviewed the records for FY 2020 and 2021 as follows:</p>																									
4.5.5.2	<p>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.</p> <p>- Major compliance -</p>	<p>Treated POME discharge was regularly monitored as prescribed under Compliance Schedule License no. 003180. Limit of Biochemical Oxygen Demand (BOD) discharge is 100 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:</p> <p>3rd quarter (report date: 14/10/2021)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Jul</th> <th>Aug</th> <th>Sep</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.00</td> <td>7.90</td> <td>8.20</td> </tr> <tr> <td>BOD</td> <td>0.00</td> <td>40.00</td> <td>54.00</td> </tr> </tbody> </table> <p>2nd quarter (report date: 07/07/2021)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Apr</th> <th>May</th> <th>Jun</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>9.07</td> <td>8.30</td> <td>7.60</td> </tr> <tr> <td>BOD</td> <td>39.00</td> <td>83.00</td> <td>50.00</td> </tr> </tbody> </table>		Jul	Aug	Sep	pH	8.00	7.90	8.20	BOD	0.00	40.00	54.00		Apr	May	Jun	pH	9.07	8.30	7.60	BOD	39.00	83.00	50.00	Complied
	Jul	Aug	Sep																								
pH	8.00	7.90	8.20																								
BOD	0.00	40.00	54.00																								
	Apr	May	Jun																								
pH	9.07	8.30	7.60																								
BOD	39.00	83.00	50.00																								

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		The effluent analysis confirms with condition prescribed under Compliance Schedule.	
4.6 Principle 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 -	At Kemaman Palm Oil Mill, the Standard Operating Procedure & Operation Manual updated on November 2012 (TDM/KPOM/01 dated 1 May 2011) is available as a guidance document to operate the mill. There were total of 25 SOPs been established and documented. For SCCS implementation, RSPO Supply Chain Standard Operating Procedure – Identity Preserved and Mass Balance Module, TDM/MILLS/02 rev: 01/2018 dated 1/7/18 is referred to.	Complied
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	The following reports are established to monitor the mill operations: i. Daily production report a. Progress report b. FFB quality / Extraction Ratios c. Qualities issues/complaints d. MPD analysis e. Manpower f. Process control g. Mill throughput /downtime h. Water consumption	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> i. Processing cost /CAPEX. ii. Annual Sustainability Department Internal Audit iii. The Mill Advisor visits. <p>The Mill Manager then develop action plans from the Mill Advisor visit report and internal audit report for improvement of mill operations. Review of reports, action plans and site inspections confirmed consistent records of implementation of SOPs. This to ensure that performance is on track and best practices being consistently implemented.</p>	
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>Kemaman Palm Oil Mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains;</p> <ul style="list-style-type: none"> a) FFB Processing & CPO/CPK production forecast b) Extraction Ratios – OER / KER, c) Cost of production <ul style="list-style-type: none"> - administration / labour overhead - processing cost labour, maintenance, consumables - depreciation and head office charges- - EVIT running accounts - CAPEX - capital expenditure. 	Complied
Criterion 4.6.3: Transparent and fair price dealing			

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Kemaman Palm Oil Mill received only own FFB crops from its certified estates. However, the pricing of FFB available and was displayed at the weighbridge area.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Contracts are fair, legal and transparent as per sampled agreement provided by Kemaman Palm Oil Mill as following: - CPO & PK Transport Agreement between TDM Plantation Sdn. Bhd. with Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad; Date: 1/1/2019; Due date: 31/12/2019; Extension letter ref. # TDMP/OD/09/01.32; Date: 29/8/2021; Due date: 31/12/2021; Signed date: 6/9/2021 - Contract Work Order Agreement # P/C05/203/2021; Contractor: Lit Tat Supplies Sdn. Bhd.; Date: 1/9/2021; Period: 1/9/2021 – 15/9/2021	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 -	Kemaman Palm Oil Mill provided MSPO information and documentation for engaged contractors via work agreement signed by the contractors prior to delivery of work items and/or services. Briefing to contractors together done by mill management to contractors during signing of <i>Perjanjian Pesanan Kerja</i> (Work Order Agreement) which included the provision for contractors to comply with legal requirements, MSPO requirements and authorization by the mill to audit the contractors from time to time on their compliance against all relevant requirements.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.	Evidence of agreed contracts with contractor provided by Kemaman Palm Oil Mill as per sample as following:	Complied

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<ul style="list-style-type: none"> - CPO & PK Transport Agreement between TDM Plantation Sdn. Bhd. with Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad; Date: 1/1/2019; Due date: 31/12/2019; Extension letter ref. # TDMP/OD/09/01.32; Date: 29/8/2021; Due date: 31/12/2021; Signed date: 6/9/2021 - Contract Work Order Agreement # P/C05/203/2021; Contractor: Lit Tat Supplies Sdn. Bhd.; Date: 1/9/2021; Period: 1/9/2021 – 15/9/2021 	
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p>- Minor compliance -</p>	TDM Plantation Sdn Bhd has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Complied

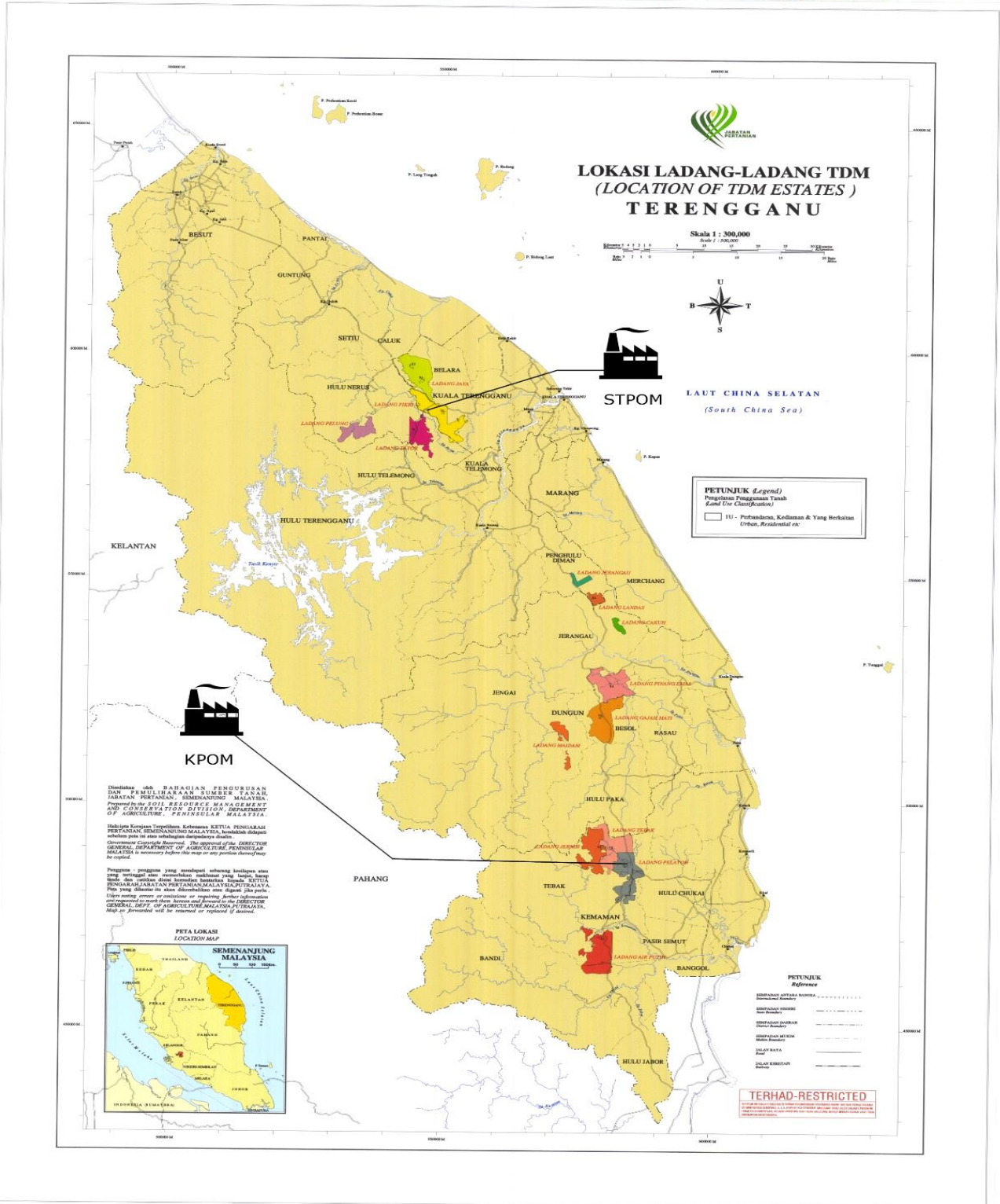
Appendix B: List of Stakeholders Contacted

<p>Government Officer: Government Nursery Teacher (Tabika Kemas Sungai Mas)</p>	<p>Community/neighbouring village: Co-operative Manager (Pengurus Koperasi Pekerja-pekerja TDM Kemaman)</p>
<p>Suppliers/Contractors/Vendors: Sundry shop operators – Pelantoh Estate, Tebak Estate & Jernih Estate</p>	<p>Worker’s Representative/Gender Committee: On site Management Representatives Gender Committee Representatives Male and Female workers Workers Representatives Foreign Workers Representatives</p>

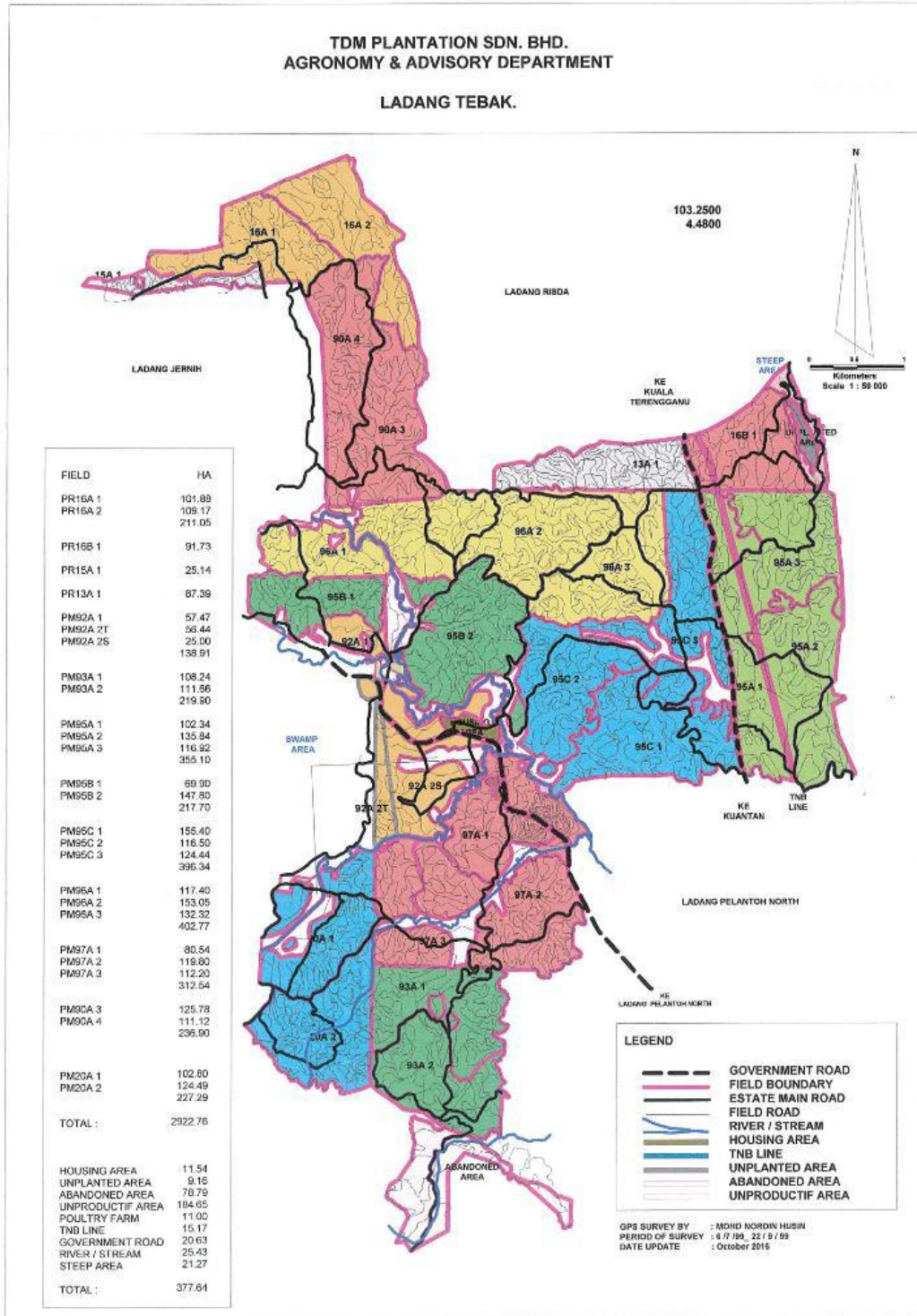
Appendix C: Smallholder Member Details

No.	Smallholder		Location of Planted Area (District)	GPS Coordinates	Certified Area (ha)	Planted Area (ha)
	Name	MPOB License Number				
	N/A					

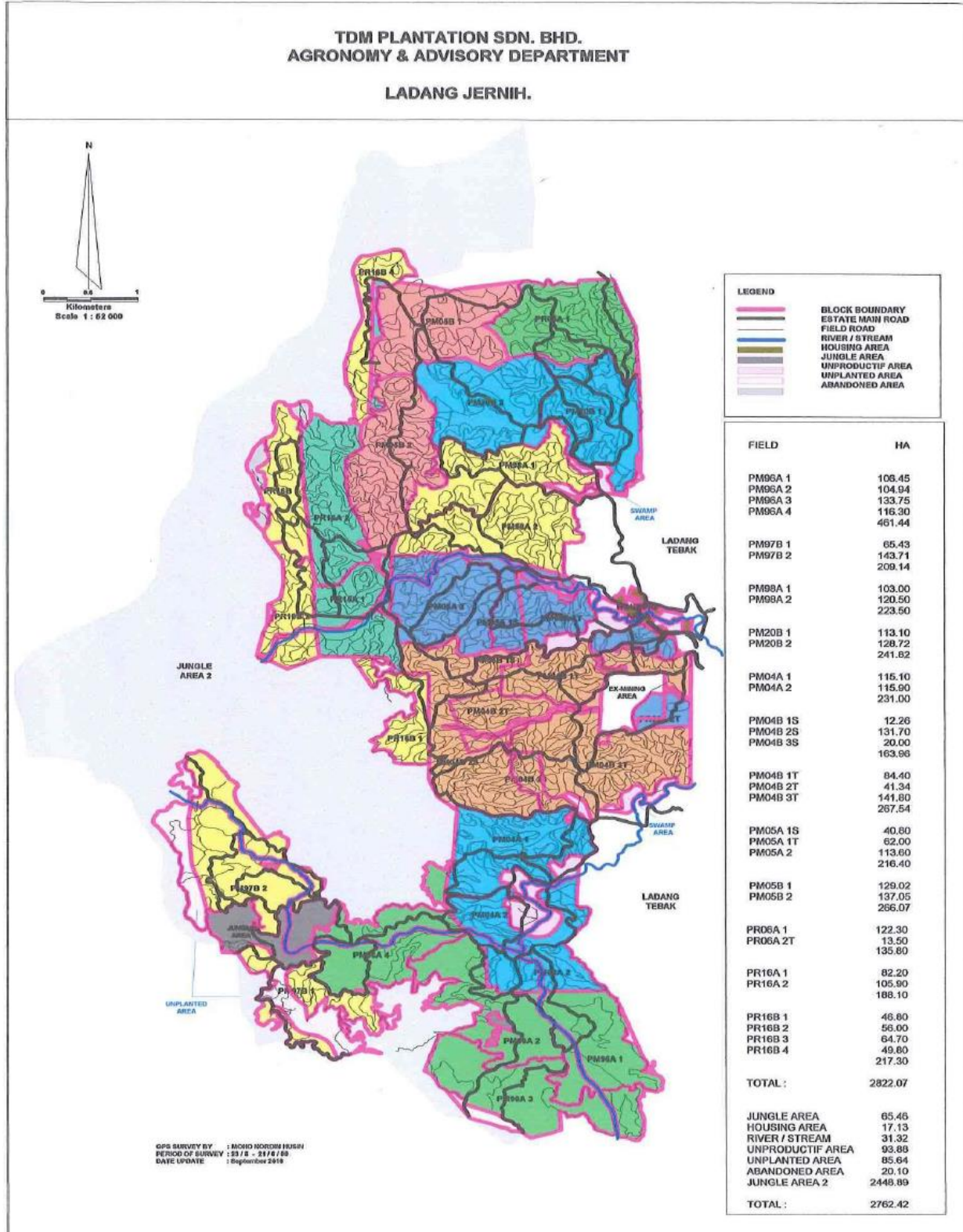
Appendix D: Location and Field Map (Location of Kemaman Palm Oil Mill & Estates)



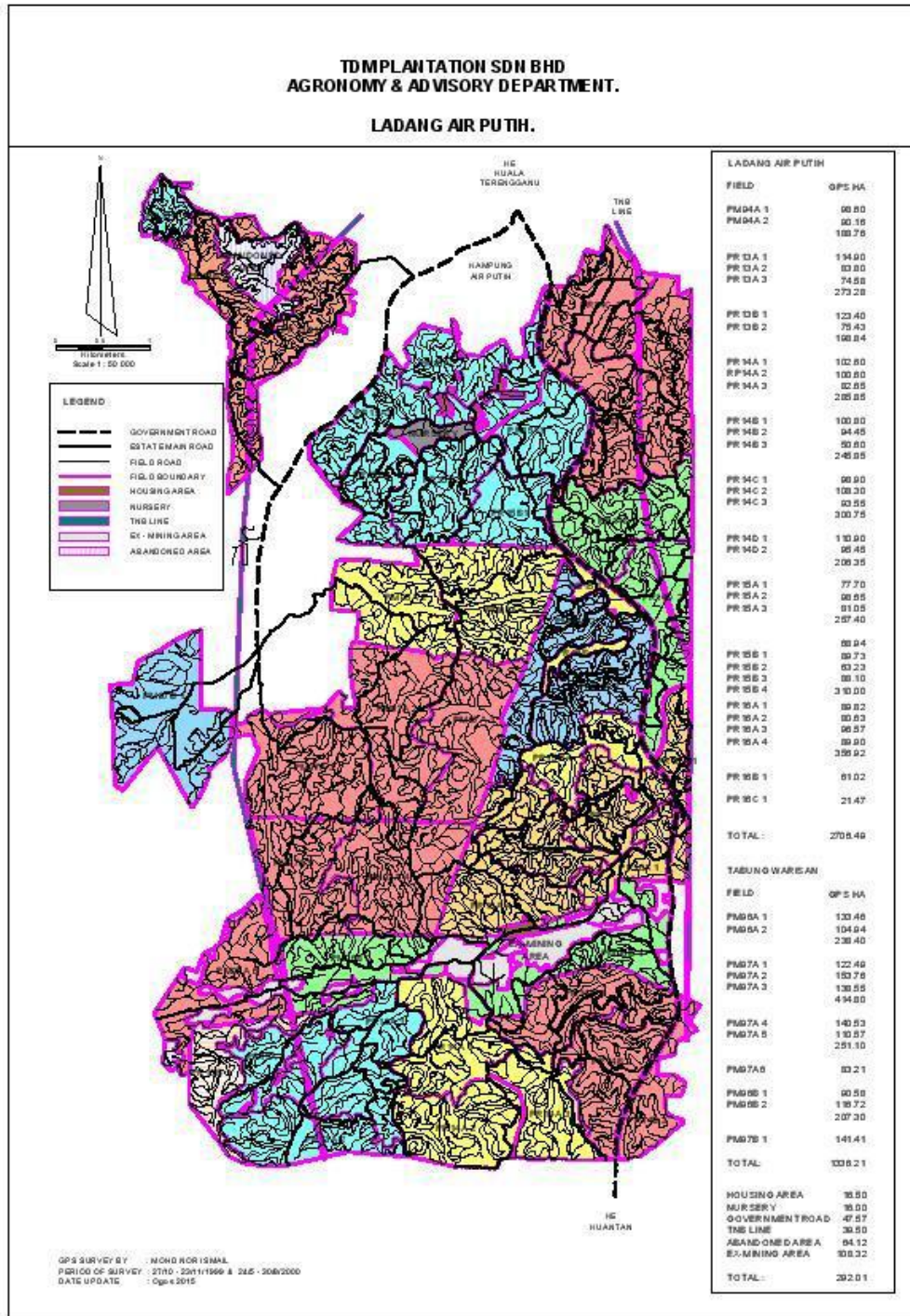
Tebak Estate



Jernih Estate



Air Putih Estate



Appendix E: 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