

**MALAYSIAN SUSTAINABLE PALM OIL**  
**MSPO OPMC Public Summary Report**

- Initial Assessment
- Annual Surveillance Assessment (Choose an item.)
- Recertification Assessment (RA 1)
- Extension of Scope

<b>SIME DARBY PLANTATION BERHAD</b>
Client Company (HQ) Address: Level 11, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7, 47301 Ara Damansara Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 10) - Bukit Puteri Palm Oil Mill and Bukit Puteri Estate
Date of Final Report: 6/6/2022

**Report prepared by:**  
**Vijay Kanna Pakirisamy** (Lead Auditor)

**Report Number: 3511627**

**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

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## Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
<b>Company Name</b>	Sime Darby Plantation Berhad		
<b>Mill/Estate</b>	<b>Certification Unit</b>	<b>MPOB License No.</b>	<b>Expiry Date</b>
	Bukit Puteri POM	536632004000	28/02/2023
	Bukit Puteri Estate	524186002000	31/10/2022
<b>Address</b>	Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia		
<b>Management Representative</b>	Shylaja Devi Vasudevan Nair		
<b>Website</b>	www.simedarbyplantation.com	<b>E-mail</b>	shylaja.vasudevan@simedarbyplantation.com
<b>Telephone</b>	+(603) 78484379	<b>Facsimile</b>	+(603) 7848437

1.2 Certification Information			
<b>Certificate Number</b>	Mill: MSPO 745404 Estate: MSPO 745405	<b>Certificate Start Date</b>	27/11/2022
<b>Date of First Certification</b>	27/11/2017	<b>Certificate Expiry Date</b>	26/11/2027
<b>Scope of Certification</b>	<input checked="" type="checkbox"/> Mills: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estates: Production of Sustainable Oil Palm Fruits		
<b>Visit Objectives</b>	<p>The objective of the assessment was to conduct a recertification assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by Bukit Puteri POM and Supply Base's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives.</p>		
<b>Standard</b>	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		
<b>Recertification Assessment Visit Date (RA1)</b>	05 - 08/04/2022		
<b>Continuous Assessment Visit Date (CAV) 1_1</b>	-		
<b>Continuous Assessment Visit Date (CAV) 1_2</b>	-		
<b>Continuous Assessment Visit Date (CAV) 1_3</b>	-		
<b>Continuous Assessment Visit Date (CAV) 1_4</b>	-		

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1.3 Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 745403	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn Bhd	06/07/2026
MSPO 745406	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018	BSI Services Malaysia Sdn Bhd	24/10/2024

1.4 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/ Estate)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Bukit Puteri POM	K/B 31, Sungai Koyan, 27650 Raub, Pahang, Malaysia	4° 12' 09.19" N	101° 51' 45.43" E
Bukit Puteri Estate	Sungai Koyan, 27650 Raub, Pahang, Malaysia	4° 12' 47.02" N	101° 51' 39.63" E

1.5 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Puteri Estate	3660.83	21.36	160.33	3842.52	95.22
<b>Total (ha)</b>	<b>3660.83</b>	<b>21.36</b>	<b>160.33</b>	<b>3842.52</b>	

Notes: Sime Darby have conducted GPS Mapping Method to update a more accurate GPS Mapping for a number of estates including Bukit Puteri Estate in December 2020. The results of GPS Mapping showed reduction in Total Planted Area and Total Area for the estate.

1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Puteri Estate	203.75	2113.49	416.06	927.53	-	3,457.08	203.75
<b>Total (ha)</b>	<b>203.75</b>	<b>2,113.49</b>	<b>416.06</b>	<b>927.53</b>	<b>-</b>	<b>3,457.08</b>	<b>203.75</b>

1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Nov 2021 - Oct 2022)	Actual (Apr 2021 - Mar 2022)	Forecast (May 2022 - Apr 2023)

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Bukit Puteri Estate	71,775.23	50,468.89	69,287.00
Kerdau Estate	-	84.17	-
Sg Mai Estate	-	734.94	-
Mentakab Estate	-	161.60	-
Noor Azlan bin Kasmani	-	1,954.91	-
Tee Chin Hock	-	173.96	-
Tee Chin Keong	-	211.07	-
MXF Gemilang Enterprise	-	3,344.35	-
Agarwal	-	701.42	-
<b>Total (mt)</b>	<b>71,775.23</b>	<b>57,835.31</b>	<b>69,287.00</b>

### 1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Nov 2021 - Oct 2022)	Actual (Apr 2021 - Mar 2022)	Forecast (May 2022 - Apr 2023)
Atil Mela Enterprise	-	10,402.75	-
CK Teik Enterprise	-	638.68	-
Green Agro Pyramid	-	404.95	-
Pertiwi Palms Sdn Bhd	-	1,062.85	-
<b>Total (mt)</b>	-	<b>12,509.23</b>	-

### 1.9 Certified Tonnage

	Estimated (Nov 2021 - Oct 2022)	Actual (Apr 2021 - Mar 2022)	Forecast (May 2022 - Apr 2023)
	<b>Mill Capacity: 20 MT/hr</b>	<b>FFB</b>	<b>FFB</b>
	71,775.23	57,835.31	69,287.00
<b>SCC Model: MB</b>	<b>CPO (OER: 20.68 %)</b>	<b>CPO (OER: 21.30 %)</b>	<b>CPO (OER: 20.84 %)</b>
	14,843.12	12,318.92	14,439.41
	<b>PK (KER: 4.77 %)</b>	<b>PK (KER: 4.32 %)</b>	<b>PK (KER: 4.88 %)</b>
	3,423.68	2,498.48	3,381.21

### 1.10 Actual Sold Volume (CPO)

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		

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12,318.92	-	-	745.31	8,822.05	9,567.36
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<b>1.11 Actual Sold Volume (PK)</b>					
<b>PK (mt)</b>	<b>MSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSPO</b>		
2,498.48	-	-	711.94	1,009.09	1,721.03

## Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 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 05 - 08/04/2022. The audit programme is included as Section 2.4. The approach to the audit was to treat the Bukit Puteri POM and Bukit Puteri Estate 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 Certification Unit were not using MSPo certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPo Logo and related claims.

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 was 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.

Prior to on-site assessment, a global stakeholder consultation has been conducted through notification dated on 01/03/2022 via website as following:

[https://www.bsigroup.com/globalassets/localfiles/en-my/mspo/Public%20Notification/2022/03-1-mspo-public-notification\\_recertification\\_sime-darby\\_sou-10-bukit-puteri-pom--supply-base\\_english.pdf](https://www.bsigroup.com/globalassets/localfiles/en-my/mspo/Public%20Notification/2022/03-1-mspo-public-notification_recertification_sime-darby_sou-10-bukit-puteri-pom--supply-base_english.pdf)

Emails also sent to selected stakeholders among NGOs, local authorities and interested parties on 05/04/2022. No feedbacks or comments received from the global stakeholder consultation and email consultation except for on-site consultation as reported under section 3.5 of this report. 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 Section 3.6.

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.

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

This report was externally reviewed by MSP0 approved Peer Reviewer prior to certification and recertification decision by BSI. For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

<b>Assessment Program</b>					
<b>Name (Mill / Plantation / Group smallholders)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Bukit Puteri POM	✓	✓	✓	✓	✓
Bukit Puteri Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: April 3, 2023 - April 6, 2023**

**Total No. of Mandays: 7 Mandays**

**2.1 BSI Assessment Team**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Vijay Kanna Pakirisamy (VKP)	Team Leader	<p><b>Education:</b> Bachelor’s Degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010.</p> <p><b>Work Experience:</b> He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad prior to joining BSI as a Client Manager.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in November 2019, Endorsed RSPO P&amp;C Lead Auditor Course in October 2019, Endorsed RSPO SCCS Lead Auditor Course in August 2020, Endorsed MSP0 Lead Auditor Course in November 2019 and attended SMETA Requirements Training in April 2021.</p> <p><b>Aspect covered in this audit:</b></p>

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		<p>During this assessment, he assessed on the aspects of Environmental Aspects, Estate Best Practises and supply chain requirements.</p> <p><b>Language proficiency:</b>          He is fluent in English, Bahasa Malaysia, and Tamil languages.</p>
Muhammad Fadzli Masran (MFM)	Team Member	<p>He holds Bachelor’s Degree in Forestry Science, graduated from University Putra Malaysia.</p> <p><b>Work Experience:</b>          He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers’ welfare, workers’ occupational, health &amp; 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.</p> <p><b>Training attended:</b>          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.</p> <p><b>Aspect covered in this audit:</b>          During this assessment, he assessed the policy and commitment, social requirements, contract agreement, human rights, workers’ welfare, stakeholder consultation, legal requirements, land &amp; legal issue.</p> <p><b>Language proficiency:</b>          Fluent in Bahasa Malaysia and English.</p>
Mohd Sabre Salim (MSS)	Peer Reviewer	<p><b>Education:</b>          Master’s in business Administration (MBA) from UiTM in 2006 and Bachelor Science Agribusiness from UPM in 1986.</p> <p><b>Work Experience:</b>          He gained his working exposure in the plantation sector, serving as an Plantation Manager with Hap Seng Plantation Berhad and currently as consultant, free-lance lecturer, and trainer at MDV Management Sdn Bhd. He has more than 50 MSPO report that has been reviewed.</p> <p><b>Training attended:</b>          He has completed Endorsed Lead Auditor Course and Endorsed MSPO Lead Auditor Course and MSPO Peer Review certificate by MPOCC. He has attended MSPO Peer Reviewer 2 - 2017 by MPOCC.</p> <p><b>Expertise:</b></p>

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		General Management, Leadership & Financial Management Occupational Safety & Health Management Plantation (Agriculture & Agribusiness) Management Malaysian Sustainable Palm Oil (MSPO).
Muhammad Sufyan Azmi (MSA)	Peer Reviewer	<p><b>Education:</b> Master's in business Administration (MBA) from Open University of Malaysia and Bachelor Degree in Bioindustry from UPM in 2006.</p> <p><b>Work Experience:</b> He gained his working exposure in the plantation sector with 15 years' experience, currently serving as an Plantation Manager with TSH Resources Berhad and previously as an Audit Executive with Kulim Malaysia Berhad.</p> <p><b>Training attended:</b> He has attended MSPO Peer Reviewer 2 - 2017 by MPOCC.</p> <p><b>Expertise:</b> General Management, Auditing, Environment and Plantation Management.</p>

## 2.2 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

## 2.3 Accompanying Persons

No.	Name	Role
-	-	-

## 2.4 Assessment Plan

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

Date	Time	Subjects	(VKP)	(MFM)
Monday, 04/04/2022	1200 - 1600	Auditors travel from Kuala Lumpur to Raub, Pahang.	✓	✓
Tuesday, 05/04/2022 Bukit Puteri POM	0700 - 0900	Auditors travel from Raub to <b>Bukit Puteri POM</b>		
	0900 - 0930	Opening Meeting <ul style="list-style-type: none"> <li>• Presentation by BSI Lead Auditor - introduction of team member and assessment agenda</li> <li>• Confirmation of assessment scope and finalizing audit scope</li> </ul>	✓	✓
	0930 - 1230	<b>Bukit Puteri POM</b> Site visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff,	✓	✓

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Date	Time	Subjects	(VKP)	(MFM)
		workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc		
	1230 - 1330	Lunch break	✓	✓
	1330 - 1630	Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓
	1630 - 1700	Interim closing meeting	✓	✓
Wednesday, 06/04/2022 Bukit Puteri POM	0900 - 1230	<b>Bukit Puteri POM</b> Continue Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓
	1000 - 1200	Stakeholder consultation – Government Agencies, NGO, Surrounding Communities, and Contractors/Vendors (Mill and Estate Combine)	-	✓
	1230 - 1330	Lunch break	✓	✓
	1330 - 1630	<b>Bukit Puteri Estate</b> 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, Scheduled wastes management, workers housing, clinic, Landfill, etc	✓	✓
	1630 - 1700	Interim closing meeting	✓	✓
Thursday, 07/04/2022 Bukit Puteri Estate	0900 - 1230	<b>Bukit Puteri Estate</b> Continue 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, Scheduled wastes management, workers housing, clinic, Landfill, etc	✓	✓
	1230 - 1330	Lunch break	✓	✓
	1330 - 1630	Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓
	1630 - 1700	Interim closing meeting	✓	✓
Friday, 08/04/2022	0900 - 1100	<b>Bukit Puteri Estate</b> Continue Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production &	✓	✓

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<b>Date</b>	<b>Time</b>	<b>Subjects</b>	<b>(VKP)</b>	<b>(MFM)</b>
Bukit Puteri Estate		monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.		
	1100 - 1200	Assessment team discussion and preparation	✓	✓
	1200 - 1230	Closing Meeting	✓	✓
	1230	Auditors travel back to Kuala Lumpur	✓	✓

### 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 the assessment there were Two (2) Minor nonconformities and Two (2) OFIs raised. The SOU 10 - Bukit Puteri Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The below is the summary of the non-conformity raised during this assessment.

Non-Conformity Report			
<b>NCR Ref #:</b>	2186902-202204-N1	<b>Issue Date:</b>	08/04/2022
<b>Due Date:</b>	Next Surveillance Assessment	<b>Date of Closure:</b>	"Open"
<b>Area/Process:</b>	Bukit Puteri Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.4.4.2 Minor
<b>Clause Requirements:</b>	The occupational safety and health plan shall cover the following: b. The risks of all operations shall be assessed and documented.		
<b>Statement of Nonconformity:</b>	The action plan of the NRA was not fully implemented.		
<b>Objective Evidence:</b>	Noise Risk Assessment was received on 18/02/2022. The report states that the employer has to take action to control exposure within 30 days upon receiving the assessment report. As of to date the action plan and status of compliance has not been derived by the management. Verified that there was no action plan for the Audiometric Test to be conducted yet.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>Estate has requested quotation for Audiometric Test from three (3) vendors i.e. Specialist Mobile Safety Supplies Sdn. Bhd, Best Hearing Aid Centre and Clinic Sulaiman via email on 15/04/2022.</li> <li>Training for targeted employees who exposed to excessive noise is included in OSH training Matrix for FY 2022.</li> </ol>		

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<b>Root cause analysis:</b>	Management is not aware that the audiometric test needs to be conducted as per recommended by Noise Risk Assessment (NRA) report.
<b>Corrective Actions:</b>	Briefing on the requirement stated in Occupational Safety and Health (Noise Exposure) Regulations 2019 for person in-charge (Assistant/MA/SSSO) by RSQM personnel.
<b>Assessment Conclusion:</b>	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.

<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	2186902-202204-N2	<b>Issue Date:</b>	08/04/2022
<b>Due Date:</b>	Next Surveillance Assessment	<b>Date of Closure:</b>	"Open"
<b>Area/Process:</b>	Bukit Puteri POM	<b>Clause &amp; Category (Major / Minor)</b>	MSPO 2530 Part 4: 4.6.1.1 Minor
<b>Clause Requirements:</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.		
<b>Statement of Nonconformity:</b>	The procedures were not implemented adequately.		
<b>Objective Evidence:</b>	Lapses in the implementation of procedures were acknowledged as below: Water Quality for Domestic use is monitored on a monthly basis at the mill. The Water Analysis Test Report (Test Report Number: IE251/2022), Sampled on 17/02/2022 and Report issued on 01/03/2022. As per the SOP, Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results, the mill is required to raise a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results and the resampling has to be done within 7 days. Nevertheless, the Mill has not raised a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results and the resampling has not been done as of to date.		
<b>Corrections:</b>	Mill will prepare Corrective/Preventive Action Report for any Non-Conforming of latest Water Analysis Result expected to be received by month-end from R&D. Immediately carry out water resampling and send to the R&D for analysis within 7 days.		
<b>Root cause analysis:</b>	Lack of understanding/awareness on the procedure to record the action taken due to changes/newly appointed person in-charge to monitor the water sampling process		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. RSQM plan to conduct a refresher training on Water Quality Monitoring SOP to executive and lab personnel</li> <li>2. Mill management will ensure the implementation of the said process by establish a checklist on the monitoring of water quality analysis</li> </ol>		
<b>Assessment Conclusion:</b>	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.		

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Opportunity For Improvement			
<b>Ref:</b>	2186902-202204-I1	<b>Clause:</b>	MSPO 2530 Part 3: 4.5.3.2
<b>Area/Process:</b>	Bukit Puteri Estate		
<b>Objective Evidence:</b>	The segregation of domestic waste and recyclable waste could be further improved to ensure no recyclable waste are disposed via landfill.		

Opportunity For Improvement			
<b>Ref:</b>	2186902-202204-I2	<b>Clause:</b>	MSPO 2530 Part 3: 4.5.5.1
<b>Area/Process:</b>	Bukit Puteri Estate		
<b>Objective Evidence:</b>	The mechanism of monitoring water usage in the estate could be further improved to include actual value and not solely depend on the PAPB water bill records.		

Noteworthy Positive Comments	
1	Good commitment and corporation from the management.
2	Positive feedbacks from internal and external stakeholders.
3	Well maintained labour quarters at the mill and estate.
4	Generally, well implementation of Good Agricultural Practices (GAP).

### 3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
<b>NCR Ref #:</b>	2042967-202104-M1	<b>Issue Date:</b>	16/04/2021
<b>Due Date:</b>	15/07/2021	<b>Date of Closure:</b>	12/07/2021
<b>Area/Process:</b>	Bk Puteri Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.5.3.4 Major
<b>Clause Requirements:</b>	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.		
<b>Statement of Nonconformity:</b>	Empty pesticide container was not disposed in such that there is no risk to human health.		
<b>Objective Evidence:</b>	During the visit on circle spraying at field no. 2012C, it was observed that an empty herbicide container was used to keep the workers food. The container was mounted to a mini tractor which was used to transport the pre-mixed herbicides.		
<b>Corrections:</b>	The driver has removed the empty chemical container from the mini tractor immediately. Warning letter had been issued to the respective tractor driver on 16/04/2021.		

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<b>Root cause analysis:</b>	Risk on usage of the container awareness is not instil amongst the worker.
<b>Corrective Actions:</b>	Briefing on awareness of schedule waste management to the driver and all workers. To monitor the usage of empty chemical container during site observation and housing inspection.
<b>Assessment Conclusion:</b>	The following evidences were verified: Based on the evidence of correction and corrective action, the NCR is effectively closed on 12/07/2021. Continuous implementation shall be verified in the next assessment.
<b>Verification Statement:</b>	Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste which was stored in the designated scheduled waste store and disposed via licensed contractor. There was no evidence that the chemical containers were used for other purposes in the estate. Hence, the major nonconformity remains closed.

<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	2042967-202104-M2	<b>Issue Date:</b>	16/04/2021
<b>Due Date:</b>	15/07/2021	<b>Date of Closure:</b>	12/07/2021
<b>Area/Process:</b>	Bk Puteri Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO Part 3: 4.5.5.1 Major
<b>Clause Requirements:</b>	<p>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:</p> <p>d) Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all-natural waterways within the estate.</p>		
<b>Statement of Nonconformity:</b>	The protection of water course which was addressed in the estate's "Biodiversity Management Programme FY 2021" was not satisfactorily implemented.		
<b>Objective Evidence:</b>	During the visit at the riparian zone at field no. 14, it was observed that there was trace of herbicide application within the allocated riparian zone despite the planted signage "No Spraying". This is not in-line with the estate's "Biodiversity Management Programme FY 2021".		
<b>Corrections:</b>	Warning letter was issued to the Mandore and sprayers on 19/04/2021. To educate spraying gang mandore on the sensitive area.		
<b>Root cause analysis:</b>	Training on HCV is not comprehensive. Implementation of biodiversity management plan is not effective.		
<b>Corrective Actions:</b>	To arrange for HCV training to all the workers and to create awareness in the protection of sensitive area such as river reserve.		
<b>Assessment Conclusion:</b>	The following evidences were verified: Based on the evidence of correction and corrective action, the NCR is effectively closed on 12/07/2021. Continuous implementation shall be verified in the next assessment.		
<b>Verification Statement:</b>	During the visit to the riparian zone along Sungai Talang, it was noticed that the demarcated buffer zone was well established. There was no evidence of any spraying or manuring activity being done in the area. Interview with the workers indicated they understood and have been trained on the prohibition of conducting		

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	any spraying or manuring activities in the riparian zone areas. Hence, the major nonconformity remains closed.
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**Non-Conformity Report**

<b>NCR Ref #:</b>	2042967-202104-N1	<b>Issue Date:</b>	16/04/2021									
<b>Due Date:</b>	08/04/2022	<b>Date of Closure:</b>	08/04/2022									
<b>Area/Process:</b>	Bk Puteri Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.4.1.1 Minor									
<b>Clause Requirements:</b>	Social impact should be identified, and plans are implemented to mitigate the negative impacts and promote the positive ones.											
<b>Statement of Nonconformity:</b>	Identification of social impact established plan implemented to mitigate the negative impacts and promote the positive ones were not adequate.											
<b>Objective Evidence:</b>	<p>SIA identified as per records of Social Impact Assessment (SIA) Report SOU 10 Bukit Puteri; Operating Units: Bukit Puteri Palm Oil Mill &amp; Bukit Puteri Estate; Assessment Date: 17-18 September 2015; Assessment by: Social &amp; Environment Projects Unit, PSQM Department. Implementation to mitigate the negative impacts and promote positive ones established in records of Management Plan for Social Impact Assessment Bukit Puteri Estate; Towards RSPO in Sime Darby Plantation; Date: 18/2/2021. Sighted the management plan as following:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Area of concerns</th> <th style="width: 33%;">Action plan</th> <th style="width: 33%;">Expected completion date</th> </tr> </thead> <tbody> <tr> <td>Land Matter – Land title still under Austral Enterprise Berhad and Sime Darby Austral Holdings Berhad</td> <td>To communicate with Land Management Department on the status of the estate land title</td> <td>Jul 2020 – on going &amp; continuously</td> </tr> <tr> <td>Stray dog surrounding workers quarters</td> <td>To notify Majlis Daerah Lipis</td> <td>Jul 2021 – on going</td> </tr> </tbody> </table> <p>Based on the interview with workers’ representatives and records in the Internal &amp; External Complain Book, it was found that there were issues in following:</p> <ul style="list-style-type: none"> <li>- Water supply quality in Div. B workers’ housing not satisfactory, sometime water too muddy, workers need to purchase clean water for own drinking from outside (feedbacks from workers’ interviews)</li> <li>- Records in Internal &amp; External Complain Book dated 03/02/2021 indicated that 6 workers among Gang 1 driver and loader highlighted issue on low salary for Jan 2021. Whilst the complaint recipient has clarified that any miscalculation will be corrected and to offer piece-rate work if low salary due to low crops, the workers suggested the following:             <ol style="list-style-type: none"> <li>1. To pay daily-rate and OT if crop lower than target</li> <li>2. Additional piece-rate work for driver to deliver chemicals into fields with price to be told later</li> <li>3. Pricing and payment for additional work to push lorry stuck in field roads</li> </ol> </li> </ul> <p>However, these issues were not captured and identified its plan to mitigate the negative impacts. Hence, a Minor NC has been raised on the matter.</p>			Area of concerns	Action plan	Expected completion date	Land Matter – Land title still under Austral Enterprise Berhad and Sime Darby Austral Holdings Berhad	To communicate with Land Management Department on the status of the estate land title	Jul 2020 – on going & continuously	Stray dog surrounding workers quarters	To notify Majlis Daerah Lipis	Jul 2021 – on going
Area of concerns	Action plan	Expected completion date										
Land Matter – Land title still under Austral Enterprise Berhad and Sime Darby Austral Holdings Berhad	To communicate with Land Management Department on the status of the estate land title	Jul 2020 – on going & continuously										
Stray dog surrounding workers quarters	To notify Majlis Daerah Lipis	Jul 2021 – on going										
<b>Corrections:</b>	To identified and revise social management plan with an inclusion of issues highlighted in complain book and update the action taken.											

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<b>Root cause analysis:</b>	The management is not trained to effectively establish a social impact management plan.
<b>Corrective Actions:</b>	To monitor the effective of the above-mentioned training during internal audit annually. RSQM to arrange a training to the person in-charge on the management plan establishment in end of May 2021.
<b>Verification Statement:</b>	Based on the social impact assessment conducted, the mill has established Management Plan on Social Impact Assessment. The plan was updated on an annual basis with addition of issues raised during stakeholders meeting, NUPW meetings, stakeholders' complaints and grievances, OPP reports, Social Dialogue, feedbacks from Suara Kami, Whistleblowing and Ulala and others. Reviewed the implementation of the latest updated management plan dated 24/02/2022.  The RSQM has conducted training to the person in-charge on the SIA 03/06/2021 through Microsoft Teams. Reviewed the training material and training attendance. The Corrective Action Plan submitted was effectively implemented. Thus, the minor non-conformity was effectively closed on 08/04/2022.

<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	2042967-202104-N2	<b>Issue Date:</b>	16/04/2021
<b>Due Date:</b>	08/04/2022	<b>Date of Closure:</b>	08/04/2022
<b>Area/Process:</b>	Bk Puteri Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.4.5.4 Minor
<b>Clause Requirements:</b>	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.		
<b>Statement of Nonconformity:</b>	Employees of contractors not adequately ensured being paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.		
<b>Objective Evidence:</b>	<p>The estate management ensured through obtaining the copies of the contractor workers' monthly salary payslips as per sample sighted for Contractor: Lin Sing Wah Enterprise; Contract: FFB Transportation as following samples:</p> <ul style="list-style-type: none"> <li>- Payslip for Month of Jan 2021; Employee # C7126128; Earning MT FFB: 1314.51 MT x RM 3/MT; Net Pay: 1314.51</li> <li>- Payslip for Month of Feb 2021; Employee # C7126128; Earning MT FFB: [(230.87 MT x RM 3/MT = 692.61); MT FFB: (683.06 MT x RM 2.50/MT = 1707.05)]; Net Pay: 2399.66</li> <li>- Payslip for Month of Mar 2021; Employee # C7126128; Earning MT FFB: [(495.00 MT x RM 3/MT = 1485.02); MT FFB: (600.00 MT x RM 2.50/MT = 1500.00)]; Net Pay: 2985.02</li> </ul> <p>However, it was found for all 3 months sample, the salary was wrongly calculated and should be as following:</p> <ul style="list-style-type: none"> <li>- Payslip for Month of Jan 2021; Employee # C7126128; Earning MT FFB: 1314.51 MT x RM 3/MT; Net Pay: 3943.53</li> <li>- Payslip for Month of Feb 2021; Employee # C7126128; Earning MT FFB: [(230.87 MT x RM 3/MT = 692.61); MT FFB: (683.06 MT x RM 2.50/MT = 1707.65)]; Net Pay: 2400.66</li> </ul>		

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	<p>- Payslip for Month of Mar 2021; Employee # C7126128; Earning MT FFB: [(495.00 MT x RM 3/MT = 1485.00); MT FFB: (600.00 MT x RM 2.50/MT = 1500.00)]; Net Pay: 2985.00</p> <p>Furthermore, the employment contract agreed between the contractor and his employee was not available. Hence, a Minor NC has been raised on the matter.</p>
<b>Corrections:</b>	<p>a. The estate management to inform the contractor to prepare and submit a copy of the employment agreement between contractor and his employee.</p> <p>b. Estate management has issued a written reminder to the said contractor for breaching a clause on legal requirement compliance in the contract between SDP and the contractor.</p> <p>c. To revise employees of contractor's payslip.</p>
<b>Root cause analysis:</b>	Due diligence to ensure the contractor compliance to legal requirement is not being monitored effectively.
<b>Corrective Actions:</b>	To arrange refresher training to contractor on the requirement to comply with Employment Act 1955.
<b>Verification Statement:</b>	<p>The contractors submitted the workers' pay slips to the estate on monthly basis. Reviewed the contracts workers' pay slips for the month of December 2021, January and February 2022.</p> <p>The estate has conducted briefing to the contractors on employment contracts and pay slips on 01/03/2022.</p> <p>The estate has conducted due diligence on contractor's employment contracts and pay slips. Reminder letter was issued to the contractors for non-conformity. 3 months period was given to the contractors to comply with the requirement. Reviewed the reminder letters dated 03/02/2022 signed by the Regional CEO, Central East Region.</p> <p>The Corrective Action Plan submitted was effectively implemented. Thus, the minor non-conformity was effectively closed on 08/04/2022.</p>

<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	2042967-202104-N3	<b>Issue Date:</b>	16/04/2021
<b>Due Date:</b>	08/04/2022	<b>Date of Closure:</b>	08/04/2022
<b>Area/Process:</b>	Bk Puteri Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.6.1.1 Minor
<b>Clause Requirements:</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.		
<b>Statement of Nonconformity:</b>	The safe operating procedure was not adequately adhered to.		
<b>Objective Evidence:</b>	During the visit on circle spraying at field no. 2012C, it was observed that all the three spraying workers tucked their long pants inside their Wellington boots (PPE). This is not in-line with the SOP Menyembur Racun (Herbicides Spraying) [doc. No. BPE/SOP/011], Clause no. 5, which reads, "Pastikan baju berlengan panjang dan memakai seluar panjang yang menutupi kasut getah sepanjang masa." (Ensure long-sleeve shirt is worn and long pants are covering the Wellington boots at all time.)		

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<b>Corrections:</b>	a. To carry out a refresher training on wearing a complete PPE and proper attire. b. A warning letter has been issued to the respective sprayers on 16/04/2021.
<b>Root cause analysis:</b>	The risk of non-compliance to SOP is not well communicated to the worker and insufficient monitoring of SOP implementation on the ground. SOP No BPE/SOP/011 is outdated and not relevant to current situation.
<b>Corrective Actions:</b>	To review the SOP of Herbicides Spraying with RSQM team as the clause of "memakai seluar panjang yang menutupi kasut getah sepanjang masa" (wearing long pants that cover the gumboot at all time) is not relevant. To continuously monitor PPE usage by supervisor/mandore.
<b>Verification Statement:</b>	The estate management have carried out refresher trainings for all workers on PPE usage. Site visit and interview with the workers indicated that all appropriate PPE were used by the workers.  The clause of "memakai seluar panjang yang menutupi kasut getah sepanjang masa" (wearing long pants that cover the gumboot at all time) has been omitted from the SOP.  The Corrective Action Plan submitted was effectively implemented. Thus, the minor non-conformity was effectively close on 08/04/2022.

<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	2042967-202104-N4	<b>Issue Date:</b>	16/04/2021
<b>Due Date:</b>	08/04/2022	<b>Date of Closure:</b>	08/04/2022
<b>Area/Process:</b>	Bk Puteri POM	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO Part 4: 4.3.1.4 Minor
<b>Clause Requirements:</b>	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.		
<b>Statement of Nonconformity:</b>	The monitoring of legal compliance was not satisfactorily demonstrated.		
<b>Objective Evidence:</b>	<p>The following lapses was found:</p> <ul style="list-style-type: none"> <li>i) The recorded videos from the CCTV to monitor the boiler's chimney for the past six months were insufficient. The oldest record was on 04/01/2021. This is not in-line with the Clause no. 20 stipulated in the "Jadual Pematuhan" (Compliance Schedule) of the DOE's License No. 004160.</li> <li>ii) The Safety Data Sheets (SDS) for most of the chemicals in the mill's chemical store were more than 5 years. Among the chemicals are Alum 3276, Soda Ash, Nalco 3935, Nalco 214, Nalco 19PULV and Nalco 22312. The last review of those SDS was in 2015. This is not in-line with Occupational safety and health (classification, labelling and safety data sheet of hazardous chemicals) Regulations 2013, Reg. 4(b).</li> </ul>		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>a. Quotation to upgrade the memory disc drive has been received. Mill will proceed with issue the contract form.</li> <li>b. Mill has contacted the chemical supplier for the latest version of SDS. The collection of the SDS is in progress.</li> </ul>		

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<b>Root cause analysis:</b>	A mechanism to monitor legal compliance is not comprehensive and training is not adequate.
<b>Corrective Actions:</b>	To provide training on compliance to legal requirement to the management and office staff. To monitor the compliance every quarterly during workplace inspection.
<b>Verification Statement:</b>	<ul style="list-style-type: none"> <li>a. The recorded videos from the CCTV to monitor the boiler’s chimney were sufficient and available.</li> <li>b. The safety data sheet for all chemicals were available in the chemical store. All safety data sheet was updated and recently reviewed, obtained from the suppliers itself.</li> <li>c. The management have appointed a PIC to monitor the legal compliance in the mill. Regular trainings were conducted on compliance to legal requirements and documents were available for verification.</li> </ul> <p>The Corrective Action Plan submitted was effectively implemented. Thus, the minor non-conformity was effectively closed on 08/04/2022.</p>

Opportunity For Improvement			
<b>Ref:</b>	NA	<b>Clause:</b>	-
<b>Area/Process:</b>	-		
<b>Objective Evidence:</b>	-		
<b>Verification Statement:</b>	-		

**3.4 Summary of the Nonconformities and Status**

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
2186902-202204-N1	Part 3: 4.4.4.2- Minor	08/04/2022	“Open”
2186902-202204-N2	Part 4: 4.6.1.1- Minor	08/04/2022	“Open”

**3.5 Issues Raised by Stakeholders**

IS #	Description
1	<p><b>Feedbacks:</b> OCP Suppliers</p> <p>They agreed and understand the requirement from Sime Darby on FFB quality send to the mill. The mill continuously communicates with the OCP suppliers on any issue regarding FFB quality. The payment was always made on time as per payment terms stated in the contracts.</p>
	<p><b>Management Responses:</b></p> <p>Noted on the positive comment.</p>
	<p><b>Audit Team Findings:</b></p>

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	Reviewed the due diligence reports, contract agreements, VCOBC and Vendor Integrity Pledges signed and understand by the contractors.
2	<p><b>Feedbacks:</b> NUPW Representative</p> <p>They informed that they were elected by the workers through election. They have meeting with the management to discuss any issues related to workers. All the issues reported were taken action by the management and resolved accordingly. The estate and mill conducted Social Dialogue Meeting biweekly. The workers were can discuss with the management on any work related and social issue with the management freely.</p>
	<p><b>Management Responses:</b></p> <p>Noted on the positive comment.</p>
	<p><b>Audit Team Findings:</b></p> <p>Reviewed the NUPW minutes meeting, Social Dialogue Tracking report and SIA management plan.</p>
3	<p><b>Feedbacks:</b> Female Workers (Gender Committee)</p> <p>They informed that the management treated the female workers equally with male workers. No discrimination occurred. The female workers were given opportunity on promotion of work based on work performance and capability. They also informed that no case of sexual harassment and domestic violence reported. They are aware on the reporting channel if any case of sexual harassment and domestic violence occur in the estate or mill.</p>
	<p><b>Management Responses:</b></p> <p>Noted on the positive comment.</p>
	<p><b>Audit Team Findings:</b></p> <p>Reviewed the payslips, employment contracts and records of meeting minutes of Gender Committee confirmed that no discrimination and sexual harassment reported.</p>
4	<p><b>Feedbacks:</b> Foreign Workers Representative (Estate)</p> <p>They informed that the management treated everyone equally without discrimination. Their wages are paid accordance to Employment Act 1955 and Minimum Wage Order 2020. They have the rights to join any association. The estate conducted Social Dialogue Meeting biweekly. The workers were can discuss with the management on any work related and social issue with the management freely. The workers were aware on the complaints and grievances channel.</p>
	<p><b>Management Responses:</b></p> <p>Noted on the positive comment.</p>
	<p><b>Audit Team Findings:</b></p> <p>Reviewed the payslips for all sampled workers found all the workers were paid as per the legal requirements.</p>
5	<p><b>Feedbacks:</b> SK Kg. Keledak</p> <p>They informed that there was no child labour employed by Bukit Puteri Estate and Bukit Puteri POM as the students were attended school as per school terms. They understand the complaint procedure and so far, there is not any complaint reported. The estate and mill continuously provided any helps or contribution to the school when applied. The parents always give full support and commitment in any school activities. No negative impact sighted for the activities carried out by the mill and estate.</p>
	<p><b>Management Responses:</b></p> <p>Noted on the positive comment.</p>
	<p><b>Audit Team Findings:</b></p>

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	Reviewed complaint records found no issue reported by the schoolteachers.
<b>6</b>	<p><b>Feedbacks:</b> Contractors</p> <p>They informed that they have signed contract agreement with Sime Darby prior to provide services. The terms and conditions have clearly stated in the agreement included the payment term. The payment was made promptly. They also have been briefed on the VCOBC and Integrity Pledges prior to the contract signing. Sime Darby continuously conducted due diligence monitoring to the contractors.</p>
	<p><b>Management Responses:</b></p> <p>Noted on the positive comment.</p>
	<p><b>Audit Team Findings:</b></p> <p>Reviewed the due diligence reports, contract agreements, VCOBC and Vendor Integrity Pledges signed and understand by the contractors.</p>

**3.6 List of Stakeholders Contacted**

<p><b>Government Officer:</b> SK Kg. Keledek</p>	<p><b>Community/neighbouring village:</b> Kg. Keledek Representatives</p>
<p><b>Suppliers/Contractors/Vendors:</b> Noor Azlan bin Kasmani Atil Mela Enterprise MXF Gemilang enterprise</p>	<p><b>Worker’s Representative/Gender Committee:</b> Female workers Foreign Workers Workers’ Representatives</p>

**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
Based on the findings during the assessment SOU 10 Bukit Puteri Certification Unit complies with the <b>MS MS 2530-3:2013</b> and <b>MS 2530-4:2013</b> . It is recommended that the certification of SOU 10 Bukit Puteri Certification Unit is approved and/or continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> <b>MOHD SAFIRUS BIN HAILANI</b>	<b>Name:</b> <b>VIJAY KANNA PAKIRISAMY</b>
<b>Company name:</b> THE CHINA ENGINEERS (MALAYSIA) SDN BHD	<b>Company name:</b> BSI SERVICES (M) SDN BHD
<b>Title:</b> SENIOR MANAGER	<b>Title:</b> CLIENT MANAGER
<b>Signature:</b> 	<b>Signature:</b> 
<b>Date:</b> 9/5/2022	<b>Date:</b> 09 May 2022

**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
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. - <b>Major compliance -</b>	Sime Darby Plantation Berhad has established Group Sustainability and Quality Policy Statement signed by the Group Managing Director dated 02/12/2019.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. - <b>Major compliance -</b>	The Group Sustainability and Quality Policy was developed in line with Nations Sustainable Development Goals (UNSDG) 2030. In the policy statement stated the company commitment to: <ol style="list-style-type: none"> <li>1. Promoting good governance and transparency</li> <li>2. Contributing to a better society</li> <li>3. Minimising environmental harm</li> <li>4. Delivering sustainability quality</li> </ol> This policy being guided by the commitments spelt out in the Company's: - <ol style="list-style-type: none"> <li>1. Responsible Agriculture Charter (RAC)</li> <li>2. Human Rights Charter (HRC)</li> <li>3. Innovation and Productivity Charter (IPC)</li> </ol>	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			

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Criterion / Indicator		Assessment Findings	Compliance
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. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has established SOP for Internal Audit documented in Sime Darby Plantation, PSQM, Internal audit Procedure. Refer document no. SD/SDP/PSQM/IAP dated 1/11/2017. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure.	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. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has established SOP for Internal Audit documented in Sime Darby Plantation, PSQM, Internal audit Procedure. Refer document no. SD/SDP/PSQM/IAP dated 1/11/2017. Latest internal audit was conducted on 04/03/2022. The internal audit was conducted by Internal Auditors Sustainability and Quality Management Department, Certification Unit. The audit was conducted together with RSPO P&C, MSPO Part 4 and MSPO SCCS. 3 Major non-conformity and 2 OFI's was raise during the audit.	Complied
4.1.2.3	Report shall be made available to the management for their review. <b>- Major compliance -</b>	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit was responded by Estate Management within the acceptable timeframe. Reviewed the latest internal audit conducted on 04/03/2022. 3 Major non-conformity and 2 OFI's was raised during the audit. The mill has submitted the Corrective Action Plan and evidence to close the non-conformity raised on 31/03/2022.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.	Sime Darby Plantation Berhad has established SOP for Management Review documented in Standard Operation Manual, Sub-Section 5.6, dated: 25/5/2015. Based on the SOP established, the frequency for management review needs to be carried out at least once a year.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>Latest Management Review Meeting was conducted on 17/03/2022. The agenda discussed during the meeting as follows:</p> <ol style="list-style-type: none"> <li>1. MSPO and RSPO Principle and Criteria findings</li> <li>2. Customer feedbacks</li> <li>3. Process performance and product conformity</li> <li>4. Status of preventive and corrective action</li> <li>5. Follow up action from previous Management Review</li> <li>6. Changes that could affect the management system</li> <li>7. Recommendation for improvement</li> <li>8. Complaints and grievances</li> <li>9. Improvement of the effectiveness of the management system and process</li> <li>10. Resource needs</li> </ol>	
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>The continual improvement plan was addressed in QOSHE Objectives, Management Programme and Action Plan. It was documented in various forms such as:</p> <ul style="list-style-type: none"> <li>- Pollution Preventive Management Plan</li> <li>- Wastes Management Action Plan</li> <li>- Diesel Management Plan</li> <li>- Environmental Management Plan</li> <li>- Contingency Plan during Water Shortage</li> <li>- Water Management Plan</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		– Safety Management Programme	
<b>4.1.4.2</b>	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. <b>- Major compliance -</b>	The estates continuously ensure there are improvement practices in line with new information and techniques introduced in the workforce. Kaizen Charter is introduced to ensure improvement projects are in place. Lean Six Sigma is used to minimize waste (money, time, manpower, etc) where improved methods are introduced in the management system.	Complied
<b>4.1.4.3</b>	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. <b>- Major compliance -</b>	Where introduction of new machines and new work method, all level of employees will be trained to handle /implement the new techniques and work changes. Monitoring is made by the Estate Managers and Assistants throughout the on-the-job training and familiarization.	Complied
<b>4.2 Principle 2: Transparency</b>			
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>			
<b>4.2.1.1</b>	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. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has developed Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/04/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estate. Timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation. Manager is responsible for address the communication and requests.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.2.1.2	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>The management has disseminated the information of the documents that made publicly available such as management plan, OSH plan, audit reports and land titles upon request during the stakeholder meetings.</p> <p>Besides, internal and external stakeholders could access to the company's website to obtain information such as policies, annual report and complaint procedures.</p> <p>(<a href="http://www.simedarbyplantation.com/Sustainability.aspx">http://www.simedarbyplantation.com/Sustainability.aspx</a>)</p>	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has established Estate Quality Management System, Level 2, Standard Operation Manual Subsection 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008.</p> <p>The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Social Issues.</p> <p>Latest stakeholders' consultation meeting was conducted together with Bukit Puteri POM on 29/03/2021. The meeting was attended by local authorities, local community representatives, neighbors, vendors and FFB suppliers. Additionally, the estate has conducted a meeting with cattle ranchers on 18/01/2022.</p> <p>For internal stakeholders, the mill conducted the Social Dialogue on Weekly Basis. Reviewed the Social Dialogue Action Tracker for Social Dialogue dated 24/02/2022, 09/02/2022, 26/01/2022, 19/01/2022 and 03/01/2022.</p>	Complied

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4.2.2.2	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p><b>- Minor compliance -</b></p>	<p>The estate has appointed personnel to be responsible for Social Issues (consultation and communication with the relevant stakeholders) as per appointment letter which state the responsible of the PIC as follows:</p> <ol style="list-style-type: none"> <li>1. Investigate any complaint or grievances on social issue and suggest appropriate disciplinary action</li> <li>2. Keep and keep secret every record of complaint or grievances on social issue</li> <li>3. Give advice and counselling to workers</li> <li>4. Organize social activity/program</li> </ol> <p>The estate has appointed the Asst. Manager as person responsible for Social Issue as per appointment letter dated 01/01/2022 signed by the Sr. Manager.</p>	Complied
4.2.2.3	<p>List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.</p> <p><b>- Major compliance -</b></p>	<p>The estate has established the list of Stakeholders and documented in the List of Stakeholders FY 2022. The stakeholders were categorized as Contractors, Vendors/Suppliers, Local Community and Other Interested Parties (Government Agencies, School, Hospitals, Balai Polis, OCP etc.) Consultation and communication were conducted through written reports and meetings.</p> <p>Government Agencies such as DOSH recorded their visit reports in the logbook or official letter/email. Reviewed the DOSH visit records dated 25/01/2022 and JTK visit on 30/03/2022.</p> <p>For internal stakeholders, main grievances recorded were regarding housing repair. The grievances were recorded in the OPP System. Reviewed the OPP system report for the month of December 2021, January 2022, February 2022 and March 2022. All complaints have been satisfactorily addressed by the estate. Additionally, the mill conducted the Social Dialogue on Weekly Basis. Reviewed the Social Dialogue</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Action Tracker for Social Dialogue dated 24/02/2022, 09/02/2022, 26/01/2022, 19/01/2022 and 03/01/2022.</p> <p>Latest stakeholders' consultation meeting was conducted together with Bukit Puteri POM on 29/03/2021. The meeting was attended by local authorities, local community representatives, neighbors, vendors and FFB suppliers. Additionally, the estate has conducted a meeting with cattle ranchers on 18/01/2022.</p>	
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	<p>The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has established SOP for traceability and documented in Sime Darby Plantation, Sustainable Plantation Management System, ver. 2, issue no. 5 dated April 2019 under Appendix 5: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability.</p>	Complied
<b>4.2.3.2</b>	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p><b>- Major compliance -</b></p>	<p>SIME Semua 2.0 (CRS system) for traceability. Electronic tag/chip is used for each and every load/consignment. Chip is linked to Semua apps and scanned and before weigh and despatch. All information was recorded in the system which traceable to identify [field, crop type, harvesting date, number of bunches, weight etc]. Person in charge for each load/consignment is harvesting mandore and bunch counter.</p>	Complied
<b>4.2.3.3</b>	<p>The management should identify and assign suitable employees to implement and maintain the traceability system.</p> <p><b>- Minor compliance -</b></p>	<p>The estate has appointed personnel to be responsible for Supply Chain Certification System as per appointment letter which state the responsible of the PIC as follows:</p> <ol style="list-style-type: none"> <li>1. Assisting Assistant on Supply Chain Certification System</li> <li>2. Other related issues on SCCS</li> </ol>	Complied

Criterion / Indicator		Assessment Findings	Compliance		
		The estate has appointed the Chief Clerk as person responsible for traceability and supply chain certification system as per appointment letter dated 13/01/2020 signed by the Sr. manager.			
<b>4.2.3.4</b>	Records of sales, delivery or transportation of FFB shall be maintained. <b>- Major compliance -</b>	<p>The estate sends the FFB harvested to the Bukit Puteri POM. The estate maintains the records of FFB sale/dispatch to the mill. Reviewed the records of FFB dispatch as follows:</p> <table border="1"> <tr> <td> Supplier: Bukit Puteri Estate Field 15C  FFB Count Chit No.: 32351  No. of Bunch: 540  C/N. No.: 136956  Product ID: 0001-FFB A Crop  Nett weight: 5410 kg  Delivery date: 31/03/2022  Weighbridge ticket no.: 141067  MSPO certificate no.: MSPO 745405  MSPO certificate validity: 26/11/2022 </td> <td> Supplier: Bukit Puteri Estate Field 15A  FFB Count Chit No.: 32347  No. of Bunch: 641  C/N. No.: 136952  Product ID: 0001-FFB A Crop  Nett weight: 6860 kg  Delivery date: 30/03/2022  Weighbridge ticket no.: 141067  MSPO certificate no.: MSPO 745405  MSPO certificate validity: 26/11/2022 </td> </tr> </table>	Supplier: Bukit Puteri Estate Field 15C FFB Count Chit No.: 32351 No. of Bunch: 540 C/N. No.: 136956 Product ID: 0001-FFB A Crop Nett weight: 5410 kg Delivery date: 31/03/2022 Weighbridge ticket no.: 141067 MSPO certificate no.: MSPO 745405 MSPO certificate validity: 26/11/2022	Supplier: Bukit Puteri Estate Field 15A FFB Count Chit No.: 32347 No. of Bunch: 641 C/N. No.: 136952 Product ID: 0001-FFB A Crop Nett weight: 6860 kg Delivery date: 30/03/2022 Weighbridge ticket no.: 141067 MSPO certificate no.: MSPO 745405 MSPO certificate validity: 26/11/2022	Complied
Supplier: Bukit Puteri Estate Field 15C FFB Count Chit No.: 32351 No. of Bunch: 540 C/N. No.: 136956 Product ID: 0001-FFB A Crop Nett weight: 5410 kg Delivery date: 31/03/2022 Weighbridge ticket no.: 141067 MSPO certificate no.: MSPO 745405 MSPO certificate validity: 26/11/2022	Supplier: Bukit Puteri Estate Field 15A FFB Count Chit No.: 32347 No. of Bunch: 641 C/N. No.: 136952 Product ID: 0001-FFB A Crop Nett weight: 6860 kg Delivery date: 30/03/2022 Weighbridge ticket no.: 141067 MSPO certificate no.: MSPO 745405 MSPO certificate validity: 26/11/2022				
<b>4.3 Principle 3: Compliance to legal requirements</b>					

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. <b>- Major compliance -</b>	<p>Sime Darby Plantation Berhad have established a mechanism to ensure compliancy to legal and other requirement and documented in EQMS &amp; MQMS (Estate &amp; Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU10.</p> <p>PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. Refer to Sime Darby Plantation, ESH Management System Manual, ESH Legal &amp; Other Requirements; Guidelines and Procedures; Document ID: SD/SDP/SQM (ESH)/001-2-2; Revision:0. Date: 01/07/2012.</p> <p>Among the License and Permits sampled at Bukit Puteri Estate were:</p> <ol style="list-style-type: none"> <li>1. MPOB License (FFB); License Number: 524186002000; License Validity Period: 01/11/2021 – 31/10/2022.</li> <li>2. MPOB License (Nursery); License Number: 533567011000; License Validity Period: 01/11/2021 – 31/10/2022.</li> <li>3. Permit Barang Kawalan Berjadual; Reference Number: KPDNHEP.PHG.RUB.600-5/4/063; Serial Number: P (C000539); Description: Diesel; Storage Capacity: 16,380 Liters; License Validity Period: 25/05/2021 – 24/05/2022.</li> <li>4. Air Compressor (Air Receiver Tank) Permit; Registration Number: PH PMT 81559; License Expiry Date: 24/04/2023.</li> </ol>	Complied
<b>4.3.1.2</b>	The management shall list all laws applicable to their operations in a legal requirements register. <b>- Major compliance -</b>	Documented Procedures have been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008.	Complied

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		All legal requirements were documented in Legal and Other Requirement Register available at the estates. The register is reviewed regularly and updated as and when there are new or amended legal requirements that are applicable to the estate operations. The latest review for Bukit Puteri Estate on 24/02/2022.	
<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. <b>- Major compliance -</b>	<p>Documented procedures have been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008.</p> <p>All legal requirement was documented in Legal and Other Requirement Register. Compliance to each applicable law and regulation is monitored by the operating unit. The legal register at Bukit Puteri Estate were reviewed/updated on a yearly basis / as and when needed for new updates/licenses. Sighted the document 'Summary of Compliance' available at the estates undersigned by the Top Management. The document lists the latest applicable laws and amendments, revision dates and acknowledgement by the management.</p> <p>All the legal and other requirements were registered accordingly and documented in the legal requirement register including new updates for Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019, Minimum Wages Order 2020 and Auxiliary Police Regulations 1970 (Amendment), Movement Control Order 2020 &amp; Akta Pencegahan &amp; Pengawalan Penyakit Berjangkit 1988.</p>	Complied
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. <b>- Minor compliance -</b>	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.	Complied

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Criterion / Indicator		Assessment Findings	Compliance																								
		<p>On the site verification, interviews with office personnel and records verification indicates that the system is appropriate to the operations. Tracking system on any changes in the law is well implemented.</p> <p>The management has appointed the Chief Clerk, Mr. Syed Omar Bin Syed Osman as the official officer responsible for legal compliance in the estate as stated in the appointment letter dated 13/01/2020 undersigned by the Estate Manager.</p>																									
<b>Criterion 4.3.2 – Lands use rights</b>																											
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>Land titles were made available to the audit team. It was found that the land use right stated in the title is match with the operation conducted by the management and their oil palm cultivation activities do not diminish the land use rights of other users.</p>	Complied																								
<b>4.3.2.2</b>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p><b>- Major compliance -</b></p>	<p>Land titles were available at the estate office for review. the estates holds land titles as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Land Title No.</th> <th>Lot no.</th> <th>Area</th> </tr> </thead> <tbody> <tr> <td>HS(D) 30</td> <td>PT 856</td> <td>809.37 ha</td> </tr> <tr> <td>27190</td> <td>2488</td> <td>607.30 ha</td> </tr> <tr> <td>27191</td> <td>2760</td> <td>125.30 ha</td> </tr> <tr> <td>27192</td> <td>2761</td> <td>107.40 ha</td> </tr> <tr> <td>27193</td> <td>2998</td> <td>374.90 ha</td> </tr> <tr> <td>HS(D) 237</td> <td>PT 976</td> <td>1,092.65 ha</td> </tr> <tr> <td>HS(D) 238</td> <td>PT 1277</td> <td>728.433 ha</td> </tr> </tbody> </table> <p>Quit rents were paid by the estate management shows their legal ownership or lease of the said land. Reviewed the quit rent payment official receipt dated 10/03/2022.</p>	Land Title No.	Lot no.	Area	HS(D) 30	PT 856	809.37 ha	27190	2488	607.30 ha	27191	2760	125.30 ha	27192	2761	107.40 ha	27193	2998	374.90 ha	HS(D) 237	PT 976	1,092.65 ha	HS(D) 238	PT 1277	728.433 ha	Complied
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HS(D) 30	PT 856	809.37 ha																									
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Criterion / Indicator		Assessment Findings	Compliance
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - <b>Major compliance</b> -	Bukit Puteri Estate has clearly demarcated and visibly maintained its legal perimeter boundary markers. Based on site visit at Block P18A and P14C, it was noted that trenching method was used to demarcate the boundary between the estate and FELDA Sg Koyan 2 Estate.	Complied
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - <b>Minor compliance</b> -	At time of visit, there was no evidence to show of any land disputes in SOU 10 estate.	Complied
<b>Criterion 4.3.3 – Customary rights</b>			
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. - <b>Major compliance</b> -	There is no land encumbered by customary rights within Bukit Puteri Estate. This was verified with stakeholders’ consultation.	Not Applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - <b>Minor compliance</b> -	There is no land encumbered by customary rights within Bukit Puteri Estate. This was verified with stakeholders’ consultation. Nevertheless, maps available as per sighted Bukit Puteri Estate Stakeholder Map; Data Source: GPS Surveyed; Datum WGS 1984 which include the information of field boundary point, block number and info of stakeholder/neighbour etc.	Not Applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - <b>Major compliance</b> -	There is no land encumbered by customary rights within Bukit Puteri Estate. Therefore, there is no negotiation and FPIC recorded. This was verified with stakeholders’ consultation. In case of any, the Sustainable	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
		Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the FPIC process.	
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p><b>- Minor compliance –</b></p>	<p>Sime Darby Plantation Berhad has conducted the assessment to determined social impact from the mill operation and documented in the Social Impact Assessment Report (SIA) Report SOU 10 Bukit Puteri dated 17 – 18/09/2015. Base on the assessment conducted, the mill has established Management Plan on Social Impact Assessment. The plan was updated on annually basis with addition of issues raise during stakeholders meeting, NUPW meetings, stakeholders’ complaints and grievances, OPP reports, Social Dialogue, feedbacks from Suara Kami, Whistleblowing and Ulala and others. Reviewed the implementation of the latest updated management plan dated 24/02/2022 as follows:</p> <ol style="list-style-type: none"> <li>1. Based on feedbacks in Social Dialogue, the workers request for salary increment from RM 1100 to RM 1200. The management informed the workers that the salary was based on Minimum Wages Act 2020. However, from March 2022, Sime Darby agreed to standardize all minimum salary for all operating units to RM 1200. The estate has conducted briefing on the salary increment on 20/02/2022.</li> <li>2. Base on feedbacks in Social Dialogue, the workers request for increment of advance rate from RM 150 to RM 300. The management have agreed with the request and started from February 2022; the advance rate was at RM 300. Briefing on the increment of advance rate has been conducted on 20/02/2022.</li> </ol>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>3. The estate continuously conducted training to the workers on how to read the details in pay slips. Latest training was conducted on 19/02/2022.</p> <p>Base on feedbacks in Social Dialogue, the workers request to work on rest day. The management has brief the workers on 19/02/2022 that the work on rest day will be offered if there is any work available.</p>	
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has established Estate Quality Management System, Level 2, Standard Operation Manual Subsection 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1/11/2008.</p> <p>The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Social Issues.</p> <p>Sime Darby Plantation Berhad has established grievances channels for the workers such as "Suara kami", Whistle Blowing, Ulula, Oil Palm Pal (OPP) and Social Dialogue.</p> <p>The mechanism is to enable effective and timely communication with employees and external interested parties.</p>	Complied
<b>4.4.2.2</b>	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p><b>- Major compliance -</b></p>	<p>Consultation and communication were conducted through written reports and meetings.</p> <p>Any communication/request/grievances from external stakeholder were recorded in the visit logbook, stakeholders' minutes meetings, Social Dialogue Action Tracker and OPP system report.</p>	Complied

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		<p>Government Agencies such as DOSH recorded their visit reports in the logbook or official letter/email. Reviewed the DOSH visit records dated 25/01/2022 and JTK visit on 30/03/2022.</p> <p>For internal stakeholders, main grievances recorded were regarding housing repair. The grievances were recorded in the OPP System. Reviewed the OPP system report for the month of December 2021, January 2022, February 2022 and March 2022. All complaints have been satisfactorily addressed by the estate. Additionally, the mill conducted the Social Dialogue on Weekly Basis. Reviewed the Social Dialogue Action Tracker for Social Dialogue dated 24/02/2022, 09/02/2022, 26/01/2022, 19/01/2022 and 03/01/2022.</p> <p>Latest stakeholders' consultation meeting was conducted together with Bukit Puteri POM on 29/03/2021. The meeting was attended by local authorities, local community representatives, neighbors, vendors and FFB suppliers. Additionally, the estate has conducted a meeting with cattle ranchers on 18/01/2022.</p>	
<b>4.4.2.3</b>	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p><b>- Minor compliance -</b></p>	<p>The estate has established communication book/form for internal and external complaint. The communication logbook/forms are available at mill office.</p> <p>In case the complainant would want to make an anonymity complaint it can be made through electronic Complaint form such as "Suara kami", Whistle Blowing, Ulula, Oil Palm Pal (OPP) and Social Dialogue.</p>	Complied
<b>4.4.2.4</b>	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p><b>- Minor compliance -</b></p>	<p>Interview with the internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and channels such as "Suara kami", Whistle Blowing, Ulula, Oil Palm Pal (OPP) and Social Dialogue and they were briefed by the management during stakeholder meeting and morning briefing.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - <b>Major compliance</b> -	Record review found that previous complaints and requests for the past 24 months were still available.	Complied
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - <b>Minor compliance</b> -	The estate continuously contributes to the local communities. Among the contributions as follows: 1. Food relief fund collection as per payment voucher dated 20/01/2021 2. Contribution of 280 Antigen Detection Kit Saliva/Nasal Swab to SMK Setia Wangsa as per letter dated 16/02/2022.	Complied
<b>Criterion 4.4.4:</b> Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - <b>Major compliance</b> -	Sime Darby Plantation Berhad have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 1/6/ 2020. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates. The GSM team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition. The estates have established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2022. The management plan includes the ESH Risk Management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary	Complied

Criterion / Indicator	Assessment Findings	Compliance
	Monitoring, Health monitoring.	
<p><b>4.4.4.2</b> The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risks of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:               <ul style="list-style-type: none"> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>ii. all precautions attached to products shall be properly observed and applied</li> </ul> </li> <li>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).</li> <li>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.</li> <li>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</li> <li>g) The management shall conduct regular two-way communication with their employees where issues affecting</li> </ul>	<p>The occupational safety and health plan cover the following:</p> <ul style="list-style-type: none"> <li>a. Sime Darby Plantation Berhad have established the Group Policy on Health, Safety &amp; Environment (HSE) Policy Statement signed by the CEO on 1/6/2020. The policy has been communicated to the staffs and workers through induction training for new workers, morning briefing and displayed at various notice boards within the estate. The policy has been briefed to all workers on 07/06/2021</li> <li>b. Sime Darby Plantation Berhad have established Standard Operating Procedure for Risk Assessment and documented in EQMS/SOM sub-section 5.4, Appendix 5.4.1a. Bukit Puteri Estate has conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations. Among the activities verified in the HIRARC included Manuring, Harvesting, Spraying, etc. HIRARC is reviewed on annually and as and when there are any accidents that occur in the estate.</li> </ul> <p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk Assessment Report (Ref. Number: HQ/14/ASS/00/00001-202-/13) conducted by Azhar Hazardous Chemical Consultancy (DOSH Registration: HQ/14/ASS/00/358) on 10 June 2020 was available for verification.</p> <p>Medical Surveillance was conducted for workers exposed to chemicals and welding fumes in the estate as recommended in the CHRA. The medical surveillance was conducted to monitor the level</p>	<p>Minor Non-Compliance</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>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><b>- Major compliance -</b></p>	<p>of exposure on the workers towards the chemicals and fumes. Medical Surveillance was conducted from 28/04/2021 at Klinik Chung for 03 estate pre-mixers who have been exposed to chemicals. Results indicated that no workers had abnormal results (Occupational or Non occupational caused).</p> <p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 24/09/2021 by SH Safety Consultancy Sdn Bhd. The assessment report (Ref. No: PH/04/04/556) was available for verification.</p> <p><u>Audiometric Test</u></p> <p>Noise Risk Assessment was received on 18/02/2022. The report states that the employer has to take action to control exposure within 30 days upon receiving the assessment report. As of to date the action plan and status of compliance has not been derived by the management.</p> <ul style="list-style-type: none"> <li>- Verified that there was no action plan for the Audiometric Test to be conducted as of yet.</li> </ul> <p>Therefore, a minor nonconformity was raised.</p> <p>c. Bukit Puteri Estate have established a training program for employees exposed to chemicals used at the palm oil estate to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager, and representative from the chemical suppliers to the supervisors and operators. Sighted the training records as follows</p> <ul style="list-style-type: none"> <li>• Interpump Safety &amp; Maintenance Training: 23/03/2022</li> </ul> <p>d. The estate has provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC and</p>

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	<p>Pictorial Safety Standard (PSS) Palm Oil Estates dated 17.03.2008. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>e. Standard Operating Procedures for Handling of Chemicals were available in several documents such as:</p> <ul style="list-style-type: none"> <li>- Sime Darby Plantation, Chemical Safety Management; Document No. SD/SDP/PSQM (ESH)/202-OH4; dated 26.02.2015.</li> </ul> <p>f. The Estate Manager, En. Mohd Safirus bin Hailani was appointed to be the Chairman of OSH Committee at the estate as stated in the appointment letter dated 01/11/2021 undersigned by the Regional CEO, Central East Region. Estate management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Manager.</p> <p>g. The management conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees' safety, health and welfare such as operational risks and health achievement report, estate security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training. Sighted the OSH Meeting Minutes dated 21/03/2022 (01/2022), 09/12/2021 (04/2021), 13/09/2021 (03/2021) and 16/03/2021 (02/2021).</p> <p>h. Accident and Emergency procedures were available in the ESH Management System Manual; Emergency Preparedness &amp; Response Guidelines and Procedures; Doc No: SD/SDP/SQM (ESH)/001-2-6; Revision:0; Date 01.07.2012.</p>	

Criterion / Indicator		Assessment Findings	Compliance
		<p>The estate has established Emergency Response Team lead by the Estate Managers. The ERT chart and Fire Extinguisher Map was also available and verified.</p> <p>Emergency Response Training was conducted as below:</p> <ul style="list-style-type: none"> <li>• Fire Extinguisher and Fire Fighting Training – 27/01/2022</li> </ul> <p>i. First aiders were assigned to various workstation at the estates. The mandores and staffs were responsible for first aid boxes at each workstation assigned to them by the management. The first aid box was recently replenished with all stated items available in the box. First Aid trainings were conducted regularly at the sampled estates and documents of trainings were verified dated 31/03/2021</p> <p>j. Bukit Puteri Estate recorded all accidents reports and reported to HQ using the PSQM-ESH Monthly update form via online through GSQM ESH Portal. The accident occurred was reviewed on quarterly basis during OSH committee meeting.</p> <p>There were 1 accident (133 Days LTA) case for the year 2021 reported in the estate. The JKKP 8 form has been submitted to DOSH for the year ending 2021 on 11/01/2022 and documents available for verification. For the year 2022 there were no accident cases reported as of to date.</p>	
<b>Criterion 4.4.5:</b> Employment conditions			
<b>4.4.5.1</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has incorporated its policy on human rights in the Group Sustainability &amp; Quality Policy Statement mention in Indicator 4.1.1.2. Communication to employees was done through briefing during morning muster call, formal training and displayed at the notice board.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance															
<b>4.4.5.2</b>	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. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has incorporated its policy on discriminatory in the Group Sustainability & Quality Policy Statement mention in Indicator 4.1.1.2 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age. Interview with the workers showed that there was no evidence of discrimination among the employees.	Complied															
<b>4.4.5.3</b>	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. <b>- Major compliance -</b>	Employment contracts for workers were available for verification. Pay and conditions are documented and in line with the Minimum Wage Order 2020 and collective agreement. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker.  Reviewed sampled workers contract and pay slips for the month of July 2021, August 2021, and November 2021 for workers with employment ID as follows: <table border="1" style="margin-left: 40px;"> <tr> <td>1. 162869</td> <td>6. 156936</td> <td>11. 122476</td> </tr> <tr> <td>2. 088198</td> <td>7. 024121</td> <td>12. 150975</td> </tr> <tr> <td>3. 116935</td> <td>8. 024095</td> <td>13. 110785</td> </tr> <tr> <td>4. 118607</td> <td>9. 024066</td> <td>14. 140092</td> </tr> <tr> <td>5. 136351</td> <td>10. 122902</td> <td>15. 075099</td> </tr> </table>	1. 162869	6. 156936	11. 122476	2. 088198	7. 024121	12. 150975	3. 116935	8. 024095	13. 110785	4. 118607	9. 024066	14. 140092	5. 136351	10. 122902	15. 075099	Complied
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<b>4.4.5.4</b>	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. <b>- Minor compliance -</b>	The estate hired contractor Mahu Berjaya Enterprise for FFB evacuation to the mill. The contractor workers were provided with employment contracts. Pay and conditions are documented and in line with the Minimum Wage Order 2020. Reviewed the employment contracts, salary payslips and EPF and SOCSO contribution for the month of December	Complied															

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Criterion / Indicator		Assessment Findings	Compliance
		2021, January 2022 and February 2022 for workers with ID no. as follows: 1. 860913-33-XXXX 2. 910925-06-XXXX	
<b>4.4.5.5</b>	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. <b>- Major compliance -</b>	The estate has established the workers master list which contain information such as the Employee name, Race, Religion, Employee no., date of birth, date joined, IC/Passport no., Check roll type, Designation and Nationality.	Complied
<b>4.4.5.6</b>	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. <b>- Major compliance -</b>	All the workers were provided with fair contracts which has been explained, understand, agreed and signed by bot employee and employer. In the contract stated the terms and conditions such as: 1. Transfer/secondment 2. Salary 3. Working hours 4. Medical 5. Accommodation 6. Compliance 7. SOCSO/Employment Injury Scheme 8. Income tax 9. Rest Day 10. Public Holiday 11. Sick leave 12. Annual leave	Complied

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Criterion / Indicator		Assessment Findings	Compliance															
		13. Maternity leave 14. Retirement age 15. Transportation 16. Equipment tools 17. Termination of service 18. Safety and health 19. Other terms and conditions 20. Variation of term and conditions  Reviewed the sampled employment contracts for workers with employment ID as follows: <table border="1" style="margin-left: 40px;"> <tr> <td>1. 162869</td> <td>6. 156936</td> <td>11. 122476</td> </tr> <tr> <td>2. 088198</td> <td>7. 024121</td> <td>12. 150975</td> </tr> <tr> <td>3. 116935</td> <td>8. 024095</td> <td>13. 110785</td> </tr> <tr> <td>4. 118607</td> <td>9. 024066</td> <td>14. 140092</td> </tr> <tr> <td>5. 136351</td> <td>10. 122902</td> <td>15. 075099</td> </tr> </table>	1. 162869	6. 156936	11. 122476	2. 088198	7. 024121	12. 150975	3. 116935	8. 024095	13. 110785	4. 118607	9. 024066	14. 140092	5. 136351	10. 122902	15. 075099	
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<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. <b>- Major compliance -</b>	All the daily attendance and overtime work were recorded in Estate Daily Attendance Report. Reviewed the report for the month July 2021, August 2021, and November 2021 for workers with employment ID as follows: <table border="1" style="margin-left: 40px;"> <tr> <td>1. 162869</td> <td>6. 156936</td> <td>11. 122476</td> </tr> <tr> <td>2. 088198</td> <td>7. 024121</td> <td>12. 150975</td> </tr> <tr> <td>3. 116935</td> <td>8. 024095</td> <td>13. 110785</td> </tr> <tr> <td>4. 118607</td> <td>9. 024066</td> <td>14. 140092</td> </tr> <tr> <td>5. 136351</td> <td>10. 122902</td> <td>15. 075099</td> </tr> </table>	1. 162869	6. 156936	11. 122476	2. 088198	7. 024121	12. 150975	3. 116935	8. 024095	13. 110785	4. 118607	9. 024066	14. 140092	5. 136351	10. 122902	15. 075099	Complied
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Criterion / Indicator		Assessment Findings	Compliance
<b>4.4.5.8</b>	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. <b>- Major compliance -</b>	All the daily attendance and overtime work were recorded in Estate Daily Attendance Report. Reviewed the report for the month July 2021, August 2021, and November 2021	Complied
<b>4.4.5.9</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. <b>- Major compliance -</b>	Wages and overtime were paid according to the Estate Daily Attendance Report. Total hours of overtime and daily attendance has recorded in the Estate Daily Attendance. Reviewed the report for the month July 2021, August 2021, and November 2021	Complied
<b>4.4.5.10</b>	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. <b>- Minor compliance -</b>	The management has contributed 10 kg of rice once every 2 months for all their workers. Apart from that, all the workers are provided with free medical facilities. In additional, all the workers are entitled with the phone allowance of RM5 for every month. Free housing facilities were provided to all the workers and their families.	Complied
<b>4.4.5.11</b>	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. <b>- Major compliance -</b>	The estate management has provided free housing facilities to all their workers. Basic amenities such as water, electricity, football field and etc. were provided to the workers. The housing condition was in accordance to the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446). Interview with the workers confirmed that they did not have any complain or grievance related to housing to be reported.	Complied
<b>4.4.5.12</b>	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has incorporated its policy on violence and sexual harassment in the "Group Sustainability & Quality Policy Statement" mention in Indicator 4.1.1.2 where the management is committed to prevent sexual harassment and other forms of violence.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Interview with gender committee and woman workers representative showed no evidence of sexual harassment or violence happened so far.	
<b>4.4.5.13</b>	<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><b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has incorporated its policy on freedom of association in the "Group Sustainability &amp; Quality Policy Statement" mention in Indicator 4.1.1.2 where the management is committed and respect the rights of all personnel to join or form any organizations of their choice and to bargain collectively. The estate management allowed their workers to form or join any association such as NUPW. Document reviewed on their payslip found that they are deducted for the NUPW subscription fees of RM 8 monthly.</p> <p>Meeting with NUPW representative was conducted together during Social Dialogue as the NUPW representative was a member of Social Dialogue Committee. Latest meeting was conducted on 25/03/2022 The minutes of meeting were available for verification and found properly documented. Interview with the workers confirmed that they are allowed to join any trade union freely.</p>	Complied
<b>4.4.5.14</b>	<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 programmes. Children shall not exposed to hazardous working conditions.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has incorporated its policy on protecting the rights of children in the "Group Sustainability &amp; Quality Policy Statement" mention in Indicator 4.1.1.2. Based on verification of workers register, there was no evidence that anyone below 18 years of age was recruited for employment.</p>	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the</p>	<p>Bukit Puteri Estate has established a training program for all workers based on the training need analysis conducted on a yearly basis.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance														
	<p>scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p><b>- Major compliance -</b></p>	<p>COVID-19 training and briefings were sighted for the estates. Interview with the sampled workers and staff indicated that they were aware on the SOP such as social distancing, regular sanitization and use of PPE (Face Mask).</p> <p>Records of trainings were maintained by the estate as below: -</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Sexual Harassment Awareness Training</td> <td>12/03/2022</td> </tr> <tr> <td>Meeting with Stakeholder</td> <td>29/03/2022</td> </tr> <tr> <td>Briefing on Child Labour</td> <td>28/03/2022</td> </tr> <tr> <td>Code of Business Conduct Training</td> <td>30/03/2022</td> </tr> <tr> <td>HCV Briefing</td> <td>26/02/2022</td> </tr> <tr> <td>Ear Plug Usage Training</td> <td>03/11/2021</td> </tr> </tbody> </table>	Training	Date	Sexual Harassment Awareness Training	12/03/2022	Meeting with Stakeholder	29/03/2022	Briefing on Child Labour	28/03/2022	Code of Business Conduct Training	30/03/2022	HCV Briefing	26/02/2022	Ear Plug Usage Training	03/11/2021	
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<b>4.4.6.2</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>Bukit Puteri Estate has conducted training need analysis for all employees, management and contractors. The training need analysis was conducted based on the job designation and training required by the job type. Sighted the Estate: Recommended Training Needs for the year 2022 for all estates.</p>	Complied														
<b>4.4.6.3</b>	<p>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.</p> <p><b>- Minor compliance -</b></p>	<p>A training programme has been developed and available in the Annual Sustainability Programme 2022. The trainings were sighted to have been sub categorised to trainings on Environmental, GAP, SOP, Social and OSH.</p>	Complied														
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>																	
<b>Criterion 4.5.1: Environmental Management Plan</b>																	

Criterion / Indicator		Assessment Findings	Compliance
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. <b>- Major compliance -</b>	Sime Darby Plantation Berhad have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 1 <sup>st</sup> June 2020. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate. Documents associated with the trainings and briefing were available for verification dated 07/06/2021.	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. <b>- Major compliance -</b>	Bukit Puteri Estate has established the environmental plan based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The management plan was established for the activity which give significant impact for the environment and documented in Pollution Prevention Plan. The EAI and EIE were reviewed annually basis by the EAI/EIE review team.  The Environmental Management Plan for the year 2022 consist of subcategorised plans such as below. 1. Waste Management Plan 2. Energy Management Plan 3. Water Management Plan 4. HCV Management Plan 5. Pollution Prevention Plan 6. Chemical Reduction Plan 7. Integrated Pest Management Plan	Complied
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. <b>- Major compliance -</b>	Bukit Puteri Estate have established the environmental plan based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The management plan was established for the	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>activity which give significant impact for the environment. The EAI and EIE were reviewed annually basis.</p> <p>The management plan stated the objectives of the environmental issue, mitigating measures, person responsible and monitoring period. The progress of the plan was monitored on quarterly basis. The plan was reviewed on annually basis. The management plan stated the Environmental management Plan, Objectives, Category, Location, Mitigation Plan, and Monitoring frequency.</p>	
<b>4.5.1.4</b>	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p><b>- Minor compliance -</b></p>	<p>Bukit Puteri Estate has established the environmental management plan based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation.</p> <p>Bukit Puteri Estate continue to promote activities that gives positive impact to the environment by continuously provided awareness to the employees which was communicated through training, briefing and signages.</p>	Complied
<b>4.5.1.5</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>Training program is available in the estates Training Program updated on a yearly basis or revised as per the management requirement. Included in this program are subjects related to environment e.g. environmental, safety &amp; health policy, scheduled waste management, environmental responsibility, HCV &amp; Biodiversity training. Guidance was provided by the SQM prior to the approval and implementation by the estates. Trainings conducted in relation to environmental and its improvement plan are shown as follows.</p> <ul style="list-style-type: none"> <li>- HCV Briefing: 26/02/2022</li> <li>- Open Burning Awareness Training – 14/06/2021</li> <li>- RTE Training – 14/06/2021.</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance																																																				
<b>4.5.1.6</b>	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. <b>- Major compliance -</b>	Bukit Puteri Estate discussed environmental related issues in the JKKP Meetings that are conducted on a quarterly basis. The Environmental Issues were included in the meeting agenda and sighted in the meeting minutes.	Complied																																																				
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>																																																							
<b>4.5.2.1</b>	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. <b>- Major compliance -</b>	<p>The monitoring of non-renewable energy usage is done on a monthly basis. Sighted the sampled monitoring records for diesel. Electricity and water usage for 2021 as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Diesel (Litres)</th> <th>Electricity (kWh)</th> <th>Water (m<sup>3</sup>)</th> </tr> </thead> <tbody> <tr><td>Jan 2021</td><td>8305</td><td>31981</td><td>2434</td></tr> <tr><td>Feb 2021</td><td>6409</td><td>36575</td><td>5756</td></tr> <tr><td>Mar 2021</td><td>7930</td><td>32298</td><td>5570</td></tr> <tr><td>Apr 2021</td><td>8200</td><td>38419</td><td>0</td></tr> <tr><td>May 2021</td><td>7331</td><td>36805</td><td>0</td></tr> <tr><td>Jun 2021</td><td>8800</td><td>37420</td><td>6051</td></tr> <tr><td>Jul 2021</td><td>7780</td><td>34788</td><td>8185</td></tr> <tr><td>Aug 2021</td><td>8580</td><td>46687</td><td>6999</td></tr> <tr><td>Sep 2021</td><td>8271</td><td>42168</td><td>4182</td></tr> <tr><td>Oct 2021</td><td>8311</td><td>44613</td><td>2937</td></tr> <tr><td>Nov 2021</td><td>1189</td><td>42285</td><td>2937</td></tr> <tr><td>Dec 2021</td><td>7361</td><td>41982</td><td>4759</td></tr> </tbody> </table>	Month	Diesel (Litres)	Electricity (kWh)	Water (m <sup>3</sup> )	Jan 2021	8305	31981	2434	Feb 2021	6409	36575	5756	Mar 2021	7930	32298	5570	Apr 2021	8200	38419	0	May 2021	7331	36805	0	Jun 2021	8800	37420	6051	Jul 2021	7780	34788	8185	Aug 2021	8580	46687	6999	Sep 2021	8271	42168	4182	Oct 2021	8311	44613	2937	Nov 2021	1189	42285	2937	Dec 2021	7361	41982	4759	Complied
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<b>4.5.2.2</b>	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the estate yearly budgets.	Complied																																																				

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	No opportunity for renewable energy to be used in the estate.	Not Applicable
<b>Criterion 4.5.3: Waste management and disposal</b>			
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	All the estates sampled has identified the waste products and source pollution and documented in the Waste Management Plan 2022. The type of wastes been identified are Scheduled waste (SW306, SW305, SW102, SW410, SW409, SW404, Scrap Iron), Domestic waste (rubbish, garden waste and sewage), Recycle waste (tires), Clinical waste (syringe) and Industrial waste (scrap iron).	Complied
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products - Major compliance -	Bukit Puteri Estate has established the waste management plan and the plan was reviewed on annually basis. The estate has identified all waste products and source of pollution and documented in the Waste Management Plan. The waste identified has been categorized as follows: - Domestic Waste – Household Waste, Organic Waste - Industrial Waste – Scrap Metal - Scheduled Waste Generated from Estate Operation – Used Hydraulic, Clinical Waste, Oil Filter. - Recyclable Waste – Empty pesticide Containers. In the management plan stated the type of waste, source of waste, mitigation plan and person responsible.	OFI

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		Nevertheless, the segregation of domestic waste and recyclable waste could be further improved to ensure no recyclable waste are disposed via landfill.	
<b>4.5.3.3</b>	<p>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><b>- Major compliance -</b></p>	<p>Procedure for Scheduled Waste Management was established (SD/SDP/PSQM (ESH)/203-EN1) dated 26/02/2016. Proper disposal of waste material is carried out as per the company procedures. The procedures are fully understood by workers and managers.</p> <p>Bukit Puteri Estate has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>All the records were found adequate as per required by EQ (Scheduled Waste) Regulations 2005.</p> <p>Sighted the sampled scheduled waste disposal as below.</p> <ul style="list-style-type: none"> <li>• SW409 – Empty Chemical Container; Date: 30/10/2021; Quantity: 0.553 mt; Consignment Number: 1003120010009; Disposal Operator: Kualiti Alam Sdn Bhd.</li> <li>• SW306 – Spent Hydraulic Oil; Date: 29/10/2021; Quantity: 2 Drums; Consignment Number: 100312-RO3; Disposal Operator: Kualiti Alam Sdn Bhd.</li> </ul>	Complied
<b>4.5.3.4</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through scheduled waste contractor as stated under 4.5.3.3 above.	Complied

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<b>4.5.3.5</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - <b>Minor compliance</b> -	Domestic wastes are disposed through landfill located at PM 15B. Sighted the latest landfill opened on 04/04/2022. The establishment and utilisation of the landfill were guided by the Landfill Management in Estate procedure [SD/SDP/PSQM(ESH)/203-EN7, rev. 0, dated 13/03/2017].	Complied
<b>Criterion 4.5.4:</b> Reduction of pollution and emission			
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - <b>Major compliance</b> -	Bukit Puteri Estate has established Environmental Management Plan, Pollution Prevention Plan and Chemical Reduction Plan based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The plan was reviewed on annual basis.  In the plan stated the objectives on the environmental issue, mitigating measures and person responsible. The plan was monitored on monthly basis.	Complied
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - <b>Major compliance</b> -	Sighted the implementation of Pollution Prevention Plan at Bukit Puteri Estate as follows: <ul style="list-style-type: none"> <li>- To minimise soil erosion during replanting</li> <li>- To comply with EQA (Scheduled Waste) Reg 2005</li> <li>- To ensure the activates does not pollute the environment.</li> <li>- To ensure no open burning at the workers housing complex area.</li> <li>- To ensure pesticide/herbicide usage at optimum level.</li> </ul>	Complied
<b>Criterion 4.5.5:</b> Natural water resources			
<b>4.5.5.1</b>	The management shall establish a water management plan to maintain the quality and availability of natural water resources	The Water Management Plan for the Bukit Puteri Estate has been established. This is compiled on Group basis and amended to meet	OFI

Criterion / Indicator	Assessment Findings	Compliance														
<p>(surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a. Assessment of water usage and sources of supply.</li> <li>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.</li> <li>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.).</li> <li>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</li> <li>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</li> <li>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</li> </ul> <p><b>- Major compliance -</b></p>	<p>demands of specific issue in Operating Units. It was reviewed annually for the 2022 plan.</p> <p>Water for domestic use is obtained from Pengurusan Air Pahang Berhad (PAPB) and provided to all houses for daily usage. Monitoring of water usage is done monthly and data is provided in indicator 4.5.2.1. Nevertheless, the mechanism of monitoring water usage in the estate could be further improved to not solely depend on the PAPB water bill records. Hence, an OFI was raised.</p> <p>Documented in Sime Darby Slope and River Protection Policy dated 15/01/2015 signed by the Managing Director stated that buffer zone shall be maintained on both side of the riverbanks.</p> <table border="1" data-bbox="1048 818 1877 1054"> <thead> <tr> <th>River Width</th> <th>Buffer Zone</th> </tr> </thead> <tbody> <tr> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> <tr> <td>* &gt; 3 meters</td> <td>20 meters</td> </tr> </tbody> </table> <p>* for Sabah Plantations Only</p> <p>Bukit Puteri Estate have established water management plans and the plans are reviewed annually. The management plan focuses on activities with impact to natural water sources, such as water contamination and action plans during water shortage. The action plan states no chemical interventions and manuring shall be carried out in the riparian reserved. Only manual weeding/slashing is allowed. It also states to maintain terrace bund along the waterways.</p>	River Width	Buffer Zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters	* > 3 meters	20 meters	
River Width	Buffer Zone															
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Criterion / Indicator		Assessment Findings	Compliance
		<p>The quality of out-going water into rivers was monitored quarterly by carrying out water analysis. River water sampling for analysis was done for upstream, midstream, and downstream.</p> <p>Pesticide Analysis Test Report and Water Analysis Report was done at the water stream that runs through the estate. Results were available as below:</p> <ul style="list-style-type: none"> <li>a. Pesticide Analysis Test Report (Test Report No: PL585/2021) dated 25/10/2021 were available for verification. The results stated no pesticides detected in the samples.</li> <li>b. Water Analysis Report (Test Report Number: IE320/2022) dated 14/03/2022 was available for verification. The results stated all parameters were within the specifications for natural Waterways.</li> </ul>	
<b>4.5.5.2</b>	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p><b>- Minor compliance -</b></p>	<p>No bunds were sighted across main rivers and waterways in both estates. There was a total of 8 sampling points as verified with the Sampling Points map.</p>	Complied
<b>4.5.5.3</b>	<p>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).</p> <p><b>- Minor compliance -</b></p>	<p>The practice of water harvesting was evident in the Action plan to Reduce Fresh Water Usage for Financial Year 2022. The action plan was stated as below.</p> <p><u>Rainwater Collection</u></p> <ol style="list-style-type: none"> <li>1. Large containers are to be placed at strategic locations to collect rainwater through rain gutter.</li> <li>2. The rainwater shall be recycled for washing heavy machinery</li> <li>3. Usage for chemical mixing and daily operation.</li> </ol>	Complied
<p><b>Criterion 4.5.6:</b> Status of rare, threatened, or endangered species and high biodiversity value</p>			

Criterion / Indicator		Assessment Findings	Compliance												
<b>4.5.6.1</b>	<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><b>- Major compliance -</b></p>	<p>An HCV Re-assessment for Pahang Zone: Strategic Operating Unit (SOU) 10 – Bukit Puteri was conducted by PSQM Department, Sime Darby Plantation Sdn. Bhd. and available in a report dated March 2016. The report has identified the Biodiversity Values, Ecosystem Services and Social &amp; Cultural Values available within the SOU 10 landscape.</p> <p>Among the HCV areas that have been identified are as below:</p> <table border="1"> <thead> <tr> <th>Assessment Area</th> <th>Ha</th> <th>Present HCV</th> </tr> </thead> <tbody> <tr> <td>River reserve (Sg Telang)</td> <td>17.77</td> <td>HCV 4</td> </tr> <tr> <td>Water catchment</td> <td>2.81</td> <td>HCV 4</td> </tr> <tr> <td>Pond</td> <td>0.78</td> <td>HCV 4</td> </tr> </tbody> </table> <p>Visit to the buffer zone along the Sungai Talang indicated that the buffer zone has been well established with natural vegetation. Necessary Signages have been erected to create awareness on the prohibited activities along the buffer zone. There were no traces of chemical or fertilizer application along the buffer zone. Interview with the sprayers indicated that they are aware of the restrictions to apply chemicals along the buffer zones.</p>	Assessment Area	Ha	Present HCV	River reserve (Sg Telang)	17.77	HCV 4	Water catchment	2.81	HCV 4	Pond	0.78	HCV 4	Complied
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River reserve (Sg Telang)	17.77	HCV 4													
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<b>4.5.6.2</b>	<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><b>- Major compliance -</b></p>	<p>Based on the HCV report, there was no RTE species identified. Species identified. Nonetheless, signage of hunting restriction was available at various strategic places including at Sg Talang buffer zone. Among other HCV identified are river reserve (Talang River), water catchment pond and unplanted area at slope &gt;25 deg.</p>	Complied												

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<b>4.5.6.3</b>	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. <b>- Major compliance -</b>	Biodiversity Management Programme FY2022 was available for verification. Among the action plans established were: a. To educate sprayers not to spray at riparian zone b. Frequent checking and maintenance of riparian zone including signage c. To ensure no encroachment of water catchment pond d. To communicate to employees and stakeholders of restriction of encroachment at the unplantable slope areas	Complied
<b>Criterion 4.5.7: Zero burning practices</b>			
<b>4.5.7.1</b>	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. <b>- Major compliance -</b>	Zero Open Burning Policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law –EQA and Regulations 1974. No open burning noted based on the records on the land clearing and felling for the replanting at sampled estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
<b>4.5.7.2</b>	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. <b>- Major compliance -</b>	NA as no special approval from the relevant authorities.	Not Applicable
<b>4.5.7.3</b>	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. <b>- Major compliance -</b>	NA as no special approval from the relevant authorities to conduct controlled burning.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
<b>4.5.7.4</b>	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - <b>Minor compliance</b> -	Noted based on the records on the land clearing and felling for the replanting at sampled estates, method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - <b>Major compliance</b> -	SOP was established for the Estates. & Agricultural Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units as a guidance document to conduct estate operation.  The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc. Sime Darby has established mechanism to monitor the implementation of their procedure by Plantation Advisor Visit, Performance Monitoring Visit and Agronomist Visit. The visit focusing on Yield Improvement, Crop Recovery, Replanting and Immature Palms Maintenance and Mature Upkeep. Also sighted the latest addition of SOP Communicable Disease (COVID-19) Prevention & Control Procedure available.  Interview with workers and stakeholders confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.	Complied
<b>4.6.1.2</b>	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	Sime Darby Plantation Berhad has established policy on slope protection and documented in Slope and River Protection Policy signed by the Managing Director in Jan 2015. The policy stated for slope more than	Complied

Criterion / Indicator		Assessment Findings	Compliance												
	waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. <b>- Major compliance -</b>	25 degree must be exclude from any new plantation development and replanting program. All the existing crop and vegetation shall be maintained accordingly. The estate complied with this policy to not plant on slopes above 25° and Buffer Zone. The policy was communicated to the employee during master briefing, townhall training and displayed in several notice board in the estate													
<b>4.6.1.3</b>	A visual identification or reference system shall be established for each field. <b>- Major compliance -</b>	Estates visited had a visual identification/reference system for each established field/block and maps established. Field numbers and hectare were marked on palms and in some areas on signboards as sighted in the fields.	Complied												
<b>Criterion 4.6.2: Economic and financial viability plan</b>															
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. <b>- Major compliance -</b>	Business planning to ensure long-term economic and financial viability was evident. The annual budgets for the period 2022 to 2027 were sighted. The budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO/MSPO compliance etc. The budgets included projections on yield/ha, and total cost of production per MT & per ha. CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses	Complied												
<b>4.6.2.2</b>	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. <b>- Major compliance -</b>	All estates established a replanting program spanned over a 5-year period till 2025. All programs were available for verification <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Year</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Ha</td> <td>105.88</td> <td>255.10</td> <td>202.24</td> <td>203.55</td> <td>185.16</td> </tr> </tbody> </table>	Year	2022	2023	2024	2025	2026	Ha	105.88	255.10	202.24	203.55	185.16	Complied
Year	2022	2023	2024	2025	2026										
Ha	105.88	255.10	202.24	203.55	185.16										
<b>4.6.2.3</b>	The business or management plan may contain: a) Attention to quality of planting materials and FFB	The business and management plans were available in the annual budget. The annual budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO	Complied												

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	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 <b>- Major compliance -</b>	& MSP0 compliance etc. The budgets included projections on yield/ha, and total cost of production per MT & per ha.	
<b>4.6.2.4</b>	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. <b>- Major compliance -</b>	The estates performance is recorded in the monthly progress report. a. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein. b. The management also provides variance report on the performance and reviewed on a monthly basis. c. The supervisory personnel maintained a daily cost for the field operations. The SOU meeting involving the Managers sits monthly with the Regional CEO for the performance review.	Complied
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	The pricing mechanism was conducted as per contract agreement between the Contractors with Sime Darby Plantation Berhad. Pricing of the work were stated in the contract agreement. Reviewed sampled contract/Letter of Award between contractors and Sime Darby Plantation Berhad as follows: 1. Letter of Award between Mahu Berjaya Enterprise with Sime Darby dated 22/02/2022.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		2. Letter of Award between Noor Azlan bin Kasmani with Sime Darby dated 25/01/2022.	
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	Payment terms for contract work were stated in the contract agreement. Noted during interview with the contractors, all payments were made as per payment terms stated in the contracts. No delayed of payments recorded.	Complied
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	Where contractors are engaged, they shall understand the MSP0 requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	The contractors were made to understand the MSP0 requirements and shall provide the required documentation and information through meetings and trainings. Records of attendance of the meetings were available for verification. All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with para - a (i); Vendor Code of Business Conduct (VCOBC) - a (ii); all applicable laws and regulations related anti-bribery, fraud and corruption. Sighted the sampled contracts as follows: 1. Letter of Award between Mahu Berjaya Enterprise with Sime Darby dated 22/02/2022. 2. Letter of Award between Noor Azlan bin Kasmani with Sime Darby dated 25/01/2022.	Complied
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	Contract agreements between the mill and its contractors were made available. Generally, the elements of sustainability such as obligations to legal compliance, workers' welfare, safety and environmental issues.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.6.4.3</b> The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.</p> <p><b>- Minor compliance -</b></p>	<p>Sime Darby Plantation Berhad has issued Memorandum to all contractors dated 22/6/2020. In the memorandum stated the contractors have to comply as follows;</p> <ul style="list-style-type: none"> <li>a. Comply with local legal requirements</li> <li>b. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company</li> <li>c. Having signed and enforceable agreement with the company</li> <li>d. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary</li> <li>e. Having related working permits</li> <li>f. Ensure PPE utilization by contractors' employee while being in the company premise.</li> </ul> <p>Additionally, all contracted parties/vendors have signed the 'Agreement Letter to be Audit by MSPO/SCCS Auditor'.</p> <p>Sighted the memorandum accepted and signed by the contractors together with contracts as follows:</p> <ul style="list-style-type: none"> <li>1. Letter of Award between Mahu Berjaya Enterprise with Sime Darby dated 22/02/2022.</li> <li>2. Letter of Award between Noor Azlan bin Kasmani with Sime Darby dated 25/01/2022.</li> </ul>	<p>Complied</p>
<p><b>4.6.4.4</b> 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.</p> <p><b>- Major compliance -</b></p>	<p>All works performed by the contractors at the estates are checked and verified by the estate's personnel. Projects where tenders are issued by HQ are checked by representative from HQ usually from the Engineering and Mill Services Dept.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance	
<b>4.7 Principle 7: Development of new planting</b>			
<b>Criterion 4.7.1: High biodiversity value</b>			
<b>4.7.1.1</b>	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. <b>- Major compliance -</b>	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
<b>4.7.1.2</b>	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. <b>- Major compliance -</b>	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
<b>Criterion 4.7.2: Peat Land</b>			
<b>4.7.2.1</b>	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. <b>- Major compliance -</b>	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
<b>Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)</b>			

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.7.3.1</b>	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. <b>- Major compliance -</b>	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
<b>4.7.3.2</b>	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. <b>- Major compliance -</b>	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
<b>4.7.3.3</b>	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. <b>- Major compliance -</b>	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
<b>4.7.3.4</b>	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. <b>- Minor compliance -</b>	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
<b>Criterion 4.7.4: Soil and topographic information</b>			
<b>4.7.4.1</b>	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. <b>- Major compliance -</b>	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
<b>4.7.4.2</b>	Topographic information shall be adequate to guide the	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - <b>Major compliance</b> -		
<b>Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils</b>			
<b>4.7.5.1</b>	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - <b>Major compliance</b> -	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
<b>4.7.5.2</b>	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. - <b>Major compliance</b> -	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
<b>4.7.5.3</b>	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - <b>Major compliance</b> -	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
<b>Criterion 4.7.6: Customary land</b>			
<b>4.7.6.1</b>	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. - <b>Major compliance</b> -	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - <b>Minor compliance</b> -	Not Applicable as no development of new planting at Bukit Puteri Estate.	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. - <b>Major compliance</b> -	Not Applicable as no development of new planting at Bukit Puteri Estate.	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. - <b>Major compliance</b> -	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - <b>Major compliance</b> -	Not Applicable as no development of new planting at Bukit Puteri Estate.	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. - <b>Major compliance</b> -	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - <b>Major compliance</b> -	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
<b>4.7.6.8</b>	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. <b>- Minor compliance -</b>	Not Applicable as no development of new planting at Bukit Puteri Estate.	Not Applicable

**MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. - <b>Major compliance -</b>	Sime Darby Plantation Berhad has established Group Sustainability and Quality Policy Statement signed by the Group Managing Director dated 02/12/2019.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - <b>Major compliance -</b>	The Group Sustainability and Quality Policy was developed in line with Nations Sustainable Development Goals (UNSDG) 2030. In the policy statement stated the company commitment to: <ol style="list-style-type: none"> <li>1. Promoting good governance and transparency</li> <li>2. Contributing to a better society</li> <li>3. Minimising environmental harm</li> <li>4. Delivering sustainability quality</li> </ol> This policy being guided by the commitments spelt out in the Company's: - <ol style="list-style-type: none"> <li>1. Responsible Agriculture Charter (RAC)</li> <li>2. Human Rights Charter (HRC)</li> <li>3. Innovation and Productivity Charter (IPC)</li> </ol>	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			

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<p><b>4.1.2.1</b></p>	<p>Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has established SOP for Internal Audit documented in Sime Darby Plantation, PSQM, Internal audit Procedure. Refer document no. SD/SDP/PSQM/IAP dated 01/11/2017. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure.</p>	<p>Complied</p>
<p><b>4.1.2.2</b></p>	<p>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. <b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has established SOP for Internal Audit documented in Sime Darby Plantation, PSQM, Internal audit Procedure. Refer document no. SD/SDP/PSQM/IAP dated 01/11/2017. Latest internal audit was conducted on 03/03/2022. The internal audit was conducted by Internal Auditors Sustainability and Quality Management Department, Certification Unit. The audit was conducted together with RSPO P&amp;C, MSPO Part 4 and MSPO SCCS. 6 Major non-conformity was raised during the audit.</p>	<p>Complied</p>
<p><b>4.1.2.3</b></p>	<p>Reports shall be made available to the management for their review. <b>- Major compliance -</b></p>	<p>The internal audit report was documented and made available for management review. As evidence, all findings from internal audit was responded by Estate Management within the acceptable timeframe. Reviewed the latest internal audit conducted on 03/03/2022. 6 Major non-conformity was raised during the audit. The mill has submitted the Corrective Action Plan and evidence to close the non-conformity raised on 24/03/2022 and accepted by the auditors on 28/03/2022.</p>	<p>Complied</p>
<p><b>Criterion 4.1.3 – Management Review</b></p>			
<p><b>4.1.3.1</b></p>	<p>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</p>	<p>Sime Darby Plantation Berhad has established SOP for Management Review documented in Standard Operation Manual, Sub-Section 5.6, dated: 25/5/2015. Based on the SOP established, the</p>	<p>Complied</p>

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	<p>and modification. <b>- Major compliance -</b></p>	<p>frequency for management review needs to be carried out at least once a year. Latest Management Review Meeting was conducted on 22/03/2022. The agenda discussed during the meeting as follows:</p> <ol style="list-style-type: none"> <li>1. MSPO and RSPO Principle and Criteria findings</li> <li>2. Customer feedbacks</li> <li>3. Process performance and product conformity</li> <li>4. Status of preventive and corrective action</li> <li>5. Follow up action from previous Management Review</li> <li>6. Changes that could affect the management system</li> <li>7. Recommendation for improvement</li> <li>8. Complaints and grievances</li> <li>9. Improvement of the effectiveness of the management system and process</li> <li>10. Resource needs</li> </ol>	
<b>Criterion 4.1.4 – Continual Improvement</b>			
<p><b>4.1.4.1</b></p>	<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. <b>- Major compliance -</b></p>	<p>The action plan for continual improvement with regards to social and environment impacts, and opportunities were available in the mill in various forms such as Social Action Plan, Environmental Management Plan, and Master Initiative List to name a few. The plan clearly states the possible issues, action to be taken, person in charge, time frame and status of action.</p>	<p>Complied</p>
<p><b>4.1.4.2</b></p>	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. <b>- Major compliance -</b></p>	<p>This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the RCEO</p>	<p>Complied</p>

		and RGM are transacted during the monthly Managers meetings and emails.	
<b>4.2 Principle 2: Transparency</b>			
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>			
<b>4.2.1.1</b>	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. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has developed Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/04/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estate. Timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation. Manager is responsible for address the communication and requests. Reviewed the DOSH visit records dated 20/09/2021 and DOE visit records in “Borang Selongkar” dated 28/01/2021 and 21/07/2021.	Complied
<b>4.2.1.2</b>	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. <b>- Major compliance -</b>	The management has disseminated the information of the documents that made publicly available such as management plan, OSH plan, audit reports and land titles upon request during the stakeholder meetings. Besides, internal and external stakeholders could access to the company’s website to obtain information such as policies, annual report and complaint procedures. ( <a href="http://www.simedarbyplantation.com/Sustainability.aspx">http://www.simedarbyplantation.com/Sustainability.aspx</a> )	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			

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<p><b>4.2.2.1</b></p>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has established Estate Quality Management System, Level 2, Standard Operation Manual Sub – Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 01/11/2008.</p> <p>The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Social Issues.</p> <p>The mechanism is to enable effective and timely communication with employees and external interested parties.</p> <p>Latest stakeholders’ consultation meeting was conducted together with Bukit Puteri POM on 29/03/2021. The meeting was attended by local authorities, local community representatives, neighbors, vendors and FFB suppliers.</p> <p>For internal stakeholders, the mill conducted the Social Dialogue on Weekly Basis. Reviewed the Social Dialogue Action Tracker for Social Dialogue dated 16/03/2022 and 26/03/2022.</p>	<p>Complied</p>
<p><b>4.2.2.2</b></p>	<p>The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>.</p> <p><b>- Minor compliance -</b></p>	<p>The mill has appointed personnel to be responsible for Social Issues (consultation and communication with the relevant stakeholders) as per appointment letter which state the responsible of the PIC as follows:</p> <ol style="list-style-type: none"> <li>5. Investigate any complaint or grievances on social issue and suggest appropriate disciplinary action</li> <li>6. Keep and keep secret every record of complaint or grievances on social issue</li> <li>7. Give advice and counselling to workers</li> <li>8. Organize social activity/program</li> </ol>	<p>Complied</p>

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		<p>The mill has appointed the Assistant Engineer as Person Responsible for Social Issue as per appointment letter dated 01/03/2019 signed by the Mill Manager.</p>	
<p><b>4.2.2.3</b></p>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>The estates visited has established the list of Stakeholders and documented in the List of Stakeholders FY 2022. The stakeholders were categorized as Contractors, Vendors/Suppliers, Local Community and Other Interested Parties (Government Agencies, School, Hospitals, Balai Polis, OCP and etc.)</p> <p>Consultation and communication were conducted through written reports and meetings.</p> <p>Any communication/request/grievances from external stakeholder were recorded in the visit logbook, stakeholders' minutes meetings, Social Dialogue Action Tracker and OPP system report.</p> <p>Government Agencies such as DOSH and DOE recorded their visit reports in the logbook. Reviewed the DOSH visit records dated 20/09/2021 and DOE visit records in "Borang Selongkar" dated 28/01/2021 and 21/07/2021.</p> <p>For internal stakeholders, main grievances recorded were regarding housing repair. The grievances were recorded in the OPP System. Reviewed the OPP system report for the month of December 2021, January 2022, February 2022 and March 2022. All complaints have been satisfactorily addressed by the estate. Additionally, the mill conducted the Social Dialogue on Weekly Basis. Reviewed the Social Dialogue Action Tracker for Social Dialogue dated 16/03/2022 and 26/03/2022.</p> <p>Latest stakeholders' consultation meeting was conducted together with Bukit Puteri POM on 29/03/2021. The meeting was attended by local authorities, local community representatives, neighbors, vendors and FFB suppliers. No issues were raised during the meeting.</p>	<p>Complied</p>

Criterion 4.2.3 – Traceability				
<p><b>4.2.3.1</b></p>	<p>The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.</p> <p><b>- Major compliance -</b></p>	<p>Standard Operating Procedures for Sustainable Supply Chain &amp; Traceability Appendix 15, Version 2 2018 issuance Feb 2018 was established and to ensure effective implementation on sustainable supply chain and traceability of FFB.</p> <p>The Standard Operating Procedures also specifies the identified CCPs of which the risk of mixing of certified and non-certified FFB is possible as well as the control of the flow and transportation of the FFB from the harvesting block to the weighbridge and subsequently to the POM.</p>		
<p><b>4.2.3.2</b></p>	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p><b>- Major compliance -</b></p>	<p>The Sustainable Plantation Management System Appendix 15, Ver: 2, issue: 5 dated April 2019 documented the procedure for traceability. The procedure requires validation of certificate of supplying estate.</p> <p>The procedure had identified critical control points to prevent contamination of non-certified FFB. The current traceability system is Sime Weigh System.</p> <p>Reviewed the records of FFB received as follows:</p> <p>Own certified Estate</p> <table border="1" data-bbox="1088 1078 1877 1375"> <tbody> <tr> <td data-bbox="1088 1078 1480 1375"> <p>Supplier: Bukit Puteri Estate                      Product: FFB A Crop                      D/O no.: 143805                      Weighbridge no.: 141087                      Date: 31/03/2022                      Nett weigh: 5,480 kg                      MSPO cert. no. 745405                      Validity period: 24/03/2020 – 26/11/2022</p> </td> <td data-bbox="1480 1078 1877 1375"> <p>Supplier: Bukit Puteri Estate                      Product: FFB A Crop                      D/O no.: 136959                      Weighbridge no.: 141086                      Date: 31/03/2022                      Nett weigh: 4,760 kg                      MSPO cert. no. 745405                      Validity period: 24/03/2020 – 26/11/2022</p> </td> </tr> </tbody> </table>	<p>Supplier: Bukit Puteri Estate                      Product: FFB A Crop                      D/O no.: 143805                      Weighbridge no.: 141087                      Date: 31/03/2022                      Nett weigh: 5,480 kg                      MSPO cert. no. 745405                      Validity period: 24/03/2020 – 26/11/2022</p>	<p>Supplier: Bukit Puteri Estate                      Product: FFB A Crop                      D/O no.: 136959                      Weighbridge no.: 141086                      Date: 31/03/2022                      Nett weigh: 4,760 kg                      MSPO cert. no. 745405                      Validity period: 24/03/2020 – 26/11/2022</p>
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<p>Complied</p>	<p>Complied</p>			

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		<p>Outside Crop Production</p> <table border="1"> <tr> <td data-bbox="1088 451 1480 742"> Supplier: Atil Mela Enterprise  Product: FFB B Crop  D/O no.: 4283  Weighbridge no.: 141091  Date: 31/03/2022  Nett weigh: 6,890 kg  MSPO cert. no.: N/A  Validity period: N/A </td> <td data-bbox="1480 451 1877 742"> Supplier: Pertiwi Palms Sdn. Bhd.  Product: FFB A Crop  D/O no.: 14725  Weighbridge no.: 141089  Date: 31/03/2022  Nett weigh: 1,290 kg  MSPO cert. no.: N/A  Validity period: N/A </td> </tr> </table>	Supplier: Atil Mela Enterprise Product: FFB B Crop D/O no.: 4283 Weighbridge no.: 141091 Date: 31/03/2022 Nett weigh: 6,890 kg MSPO cert. no.: N/A Validity period: N/A	Supplier: Pertiwi Palms Sdn. Bhd. Product: FFB A Crop D/O no.: 14725 Weighbridge no.: 141089 Date: 31/03/2022 Nett weigh: 1,290 kg MSPO cert. no.: N/A Validity period: N/A	
Supplier: Atil Mela Enterprise Product: FFB B Crop D/O no.: 4283 Weighbridge no.: 141091 Date: 31/03/2022 Nett weigh: 6,890 kg MSPO cert. no.: N/A Validity period: N/A	Supplier: Pertiwi Palms Sdn. Bhd. Product: FFB A Crop D/O no.: 14725 Weighbridge no.: 141089 Date: 31/03/2022 Nett weigh: 1,290 kg MSPO cert. no.: N/A Validity period: N/A				
<p><b>4.2.3.3</b></p>	<p>The management shall identified and assign suitable employees to implement and maintain traceability system.</p> <p><b>- Minor compliance -</b></p>	<p>The mill has appointed personnel to be responsible for Supply Chain Certification System as per appointment letter which state the responsible of the PIC as follows:</p> <ol style="list-style-type: none"> <li>1. Assisting Assistant on Supply Chain Certification System</li> <li>2. Other related issues on SCCS</li> <li>3. To monitor any changes on the LORR and updated as and when necessary</li> </ol> <p>The mill has appointed the Assistant Engineer as Person Responsible for Social Issue as per appointment letter dated 01/01/2020 signed by the Mill Manager.</p>	<p>Complied</p>		
<p><b>4.2.3.4</b></p>	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p> <p><b>- Major compliance -</b></p>	<p>The mill maintains the records of CPO/PK storage and recorded in the Daily Production Summary Report. Sighted the report dated FY 2021 as at 31/12/2021 and FY 2022 as at 04/04/2022.</p> <p>For CPO and PK dispatch, the mill maintains records in Oil Dispatch Summary form. Sighted the CPO and PK dispatch as follows:</p> <p>CPO</p>	<p>Complied</p>		

		<p>Customer: SDOPKR          Product: Crude Palm Oil (CPO) – RSPO MB          DO. No. 4701          Weighbridge ticket. No.: 005407          Contract no. S/CCE/2202/CPO0010          Weight: 28,560 kg</p>	
		<p>PK          Customer: SDO Carey KCP          Product: Palm Kernel – RSPO MB          DO. No. 1669          Weighbridge ticket. No.: 005357          Contract no. S/CCE/2112/PKL0006          Weight: 29,280 kg</p>	
<p><b>4.3 Principle 3: Compliance to legal requirements</b></p>			
<p><b>Criterion 4.3.1 – Regulatory requirements</b></p>			
<p><b>4.3.1.1</b></p>	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.  <b>- Major compliance -</b></p>	<p>Bukit Puteri POM continues to demonstrate their commitment towards compliance with legal requirements. Among the evidence of compliance verified were:</p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 536632004000; License Validity Period: 01/03/2022 – 28/02/2023</li> <li>2. DOE License; License Number: 004160; License Validity Period: 01/07/2021 – 30/06/2022.</li> <li>3. DOE Compliance Schedule; License Number: 005086; License Validity Period: 05/06/2021 – 04/06/2022.</li> <li>4. Certificate of Permission for the use of Water Resources; Serial Number: 0066; License Registry Period: 01/01/2022 – 31/12/2022.</li> </ol>	<p>Complied</p>

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		5. Energy Commission – Private Installation; License Number: 2021/01768; Serial Number: 51015; License Validity Period: 20/09/2021 – 19/09/2022.	
<b>4.3.1.2</b>	The management shall list all relevant laws related to their operations in a legal requirements register. <b>- Major compliance -</b>	Documented Procedures have been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.  All legal requirements were documented in Legal and Other Requirement Register available at the estates. The register is reviewed regularly and updated as and when there are new or amended legal requirements that are applicable to the estate operations. The latest review was conducted on 30/03/2022.	Complied
<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. <b>- Major compliance -</b>	The LORR was last reviewed on 30/03/2022. The evaluation of compliance score card result shown summary of overall percentage of 100% as reviewed by Assistant Manager and approved by Mill Manager.	Complied
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. <b>- Minor compliance -</b>	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.  On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law is well implemented.  The mill management has appointed the Assistant II, Mr. Mohd Hazizul Bin Mohammad Nor on 01/03/2019 as the PIC to monitor any changes on the LORR and update the register as and when necessary as stated in the job functions as RSPO/MSPO/SCCS Representative undersigned by the Mill Manager.	Complied

**Criterion 4.3.2 – Lands use rights**

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<p><b>4.3.2.1</b></p>	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.  <b>- Major compliance -</b></p>	<p>The mill was located in the Bukit Puteri Estate land area under lot no PT 856. The mill has ensured the oil palm milling activities do not diminish the land use rights of other users.</p>	<p>Complied</p>
<p><b>4.3.2.2</b></p>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.  <b>- Major compliance -</b></p>	<p>The mill was located in the Bukit Puteri Estate land area. The mill holds a copy of the land title. The detail as follows:  Land Title no: HSD 30  Lot. No.: PT 856  Area: 2000 acre</p>	<p>Complied</p>
<p><b>4.3.2.3</b></p>	<p>Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  <b>- Major compliance -</b></p>	<p>The mill is not adjacent to any third party and occupies approximately around 10 Ha of the area of Bukit Puteri Estate’s land title and therefore demarcation of boundary is not necessary.</p>	<p>Complied</p>
<p><b>4.3.2.4</b></p>	<p>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).  <b>- Minor compliance -</b></p>	<p>At time of visit, there was no evidence to show of any land disputes in SOU 10 estate.</p>	<p>Complied</p>
<p><b>Criterion 4.3.3 – Customary rights</b></p>			
<p><b>4.3.3.1</b></p>	<p>Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.  <b>- Major compliance -</b></p>	<p>There is no land encumbered by customary rights within Bukit Puteri Estate. This was verified with stakeholders’ consultation.</p>	<p>Not Applicable</p>
<p><b>4.3.3.2</b></p>	<p>Maps of an appropriate scale showing extent of recognized customary rights shall be made available.  <b>- Minor compliance -</b></p>	<p>There is no land encumbered by customary rights within Bukit Puteri Estate. This was verified with stakeholders’ consultation. Nevertheless, maps available as per sighted Bukit Puteri Estate Stakeholder Map; Data Source: GPS Surveyed; Datum WGS 1984</p>	<p>Not Applicable</p>

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		which include the information of field boundary point, block number and info of stakeholder/neighbour etc.	
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. <b>- Major compliance -</b>	There is no land encumbered by customary rights within Bukit Puteri Estate. Therefore, there is no negotiation and FPIC recorded. This was verified with stakeholders' consultation. In case of any, the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the FPIC process.	Not Applicable
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance -</b>	Sime Darby Plantation Berhad has conducted the assessment to determined social impact from the mill operation and documented in the Social Impact Assessment Report (SIA) Report SOU 10 Bukit Puteri dated 17 – 18/09/2015. Base on the assessment conducted, the mill has established Management Plan on Social Impact Assessment. The plan was updated on annually basis with addition of issues raise during stakeholders meeting, NUPW meetings, stakeholders' complaints and grievances, OPP reports, Social Dialogue, feedbacks from Suara Kami, Whistleblowing and Ulala and others. Reviewed the implementation of the management plan as follows:  1. To ensure the housing area always in good condition, the management has conducted "Gotong Royong Kawasan Perumahan Pekerja" on 20/03/2022.  2. Base on complaint by the NUPW representative, the mill with wildlife department has conducted wild dog capture program on 09/03/2022	Complied

		<p>3. To control the COVID-19 contagion, the mill has conducted COVID-19 screening program 19 for all workers on 19/03/2021</p> <p>4. The mill continuously conducted road repair program to ensure the entry roads to the mill were always in good conditions.</p>	
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has established Estate Quality Management System, Level 2, Standard Operation Manual Subsection 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008.</p> <p>The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Social Issues.</p> <p>Sime Darby Plantation Berhad has established grievances channels for the workers such as "Suara kami", Whistle Blowing, Ulula, Oil Palm Pal (OPP) and Social Dialogue.</p> <p>The mechanism is to enable effective and timely communication with employees and external interested parties.</p>	Complied
<b>4.4.2.2</b>	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.</p> <p><b>- Major compliance -</b></p>	<p>Consultation and communication were conducted through written reports and meetings.</p> <p>Any communication/request/grievances from external stakeholder were recorded in the visit logbook, stakeholders' minutes meetings, Social Dialogue Action Tracker and OPP system report.</p> <p>Government Agencies such as DOSH and DOE recorded their visit reports in the logbook. Reviewed the DOSH visit records dated 20/09/2021 and DOE visit records in "Borang Selongkar" dated 28/01/2021 and 21/07/2021.</p>	Complied

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		<p>For internal stakeholders, main grievances recorded were regarding housing repair. The grievances were recorded in the OPP System. Reviewed the OPP system report for the month of December 2021, January 2022, February 2022 and March 2022. All complaints have been satisfactorily addressed by the estate. Additionally, the mill conducted the Social Dialogue on Weekly Basis. Reviewed the Social Dialogue Action Tracker for Social Dialogue dated 16/03/2022 and 26/03/2022.</p> <p>Latest stakeholders' consultation meeting was conducted together with Bukit Puteri POM on 29/03/2021. The meeting was attended by local authorities, local community representatives, neighbors, vendors and FFB suppliers. No issue was raised during the meeting.</p>	
<b>4.4.2.3</b>	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p> <p><b>- Minor compliance -</b></p>	<p>The mill has established communication book/form for internal and external complaint. The communication logbook/forms is available at mill office.</p> <p>In case the complainant would want to make an anonymity complaint it can be made through electronic Complaint form such as "Suara kami", Whistle Blowing, Ulula, Oil Palm Pal (OPP) and Social Dialogue.</p>	Complied
<b>4.4.2.4</b>	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p><b>- Minor compliance -</b></p>	<p>Interview with the internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and channels such as "Suara kami", Whistle Blowing, Ulula, Oil Palm Pal (OPP) and Social Dialogue and they were briefed by the management during stakeholder meeting and morning briefing.</p>	Complied
<b>4.4.2.5</b>	<p>Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.</p> <p><b>- Major compliance -</b></p>	<p>Record review found that previous complaints and requests for the past 24 months were still available.</p>	Complied

<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
<b>4.4.3.1</b>	<p>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.</p> <p><b>- Minor compliance -</b></p>	<p>The estate continuously contributes to local development in consultation with the local communities. Among the contributions from the mill were:</p> <ul style="list-style-type: none"> <li>- Food supply assistance (Food Pack) to employees during the PKPD in November 2021.</li> </ul>	Complied
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	<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><b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad have established the Group Policy on Health, Safety &amp; Environment (HSE) Policy Statement signed by the CEO on 1/6/2020. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the mill.</p> <p>The GSM team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p> <p>Bukit Puteri Palm Oil Mill have established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2022. The management plan includes the ESH risk management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring and Health monitoring.</p>	Complied
<b>4.4.4.2</b>	<p>The occupational safety and health plan should cover the following:</p> <ol style="list-style-type: none"> <li>A safety and health policy, which is communicated and implemented.</li> <li>The risk of all operations shall be assessed and documented.</li> </ol>	<p>The occupational safety and health plan cover the following:</p> <ol style="list-style-type: none"> <li>Sime Darby Plantation Berhad have established the Health, Safety &amp; Environment (HSE) Policy Statement signed by the CEO on 1 /6/2020. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the mill. The policy has been briefed to all workers on 11/01/2021.</li> </ol>	Complied

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<p>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:</p> <ul style="list-style-type: none"> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> <p>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).</p> <p>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.</p> <p>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.</p> <p>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 and the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p>	<p>b) The risk assessment was guided by the documented procedure UM HSE Management System; OSH Risk Management Procedure; Doc Number: HSE/SP/01; Dated: 2021. HIRARC was available for all operations within the Mill to identify the hazards, assess and recommended control measures to minimize the risks. Among the HIRARC sampled were Effluent Treatment Plant, Kernel Station, Boiler Station and Processing. HIRARCs have been recently reviewed due to accidents that occur in regard to the related activity.</p> <p>Chemical Health Risk Assessment (CHRA) was conducted in compliance with Occupational Safety and Health (USECHH) regulation 2000 on 10/06/2020 by DOSH Registered Assessor, Azhar Hazardous Chemical Consultancy (HQ/03/ASS/00/160) with the CHRA Report available for verification. The CHRA Report (Report Ref Number: HQ/14/ASS/00/00001-2020/8) was available for verification.</p> <p>Medical Surveillance was conducted to establish workers health status when they work in an environment where they are exposed to hazards such a Manganese and N-Hexane. The Mill has conducted the medical surveillance on 29/03/2022 and 30/03/2022 for 9 of the workers at Klinik Sulaiman where the results have not been obtained as of yet. As for the previous Medical Surveillance conducted on 10/03/2021, the Medical Surveillance Report was available for verification. The results indicated there were no workers with abnormal results (Occupational Caused).</p> <p>Noise Risk Assessment was conducted by HITEC IESH Holding (M) Sdn Bhd on 04/07/2020 for Bukit Puteri POM by a Noise Risk Assessor, Mohd Ismadi Bin Ismail (NRA Reg: HQ/11/PEB/00/118). The NRA Report was available for verification.</p>	
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	<p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment 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><b>- Major compliance -</b></p>	<p>Annual Audiometric Testing was conducted for all workers exposed to excessive noise in the mill at Klinik Sulaiman on 05/01/2022 – 10/01/2022. A total of 21 workers were examined and the results indicated that 9 workers had normal hearing and remainder workers had abnormal hearing. Out of the remainder workers with abnormal hearing, 7 workers were diagnosed with Permanent Threshold Shift.</p> <p>c) The mill has established a training and awareness program for employees exposed to chemicals used at the palm oil mill to ensure continuous awareness to the employees. The trainings were conducted by the Manager, Asst. Manager and representative from the chemical suppliers to the supervisors and operators.</p> <p>– Safe Chemical Handling Training: 16/02/2021</p> <p>d) The mill has provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) Palm Oil Mill dated 17/03/2008. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>e) Procedures of chemical handling is presented in several documents, such as Sime Darby Plantation Berhad, Chemical Safety Management; Document No. SD/SDP/PSQM (ESH)/202-OH4; dated 26/02/2015.</p> <p>f) The Mill Manager, Mr. Mohd Aerman Bin Ahmad was appointed to be the Chairman of OSH Committee at the Mill as stated in the appointment letter dated 01/11/2021 undersigned by the Regional CEO (Central Region Region). Estate management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and</p>	
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		<p>representatives from Employee as per appointment letter by the Estate Manager.</p> <p>g) The Mill Management conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. In the meeting, discussed issue on employees' safety, health and welfare such as mill safety and health achievement report, mill security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training. Sighted the latest OSH Meeting Minutes dated 02/03/2022 (01/2022), 08/12/2021 (04/2021) and 19/07/2021 available for verification.</p> <p>h) Accident and emergency procedures are available in the ESH Management System Manual; Emergency Preparedness &amp; Response Guidelines and Procedures; Doc No: SD/SDP/SQM (ESH)/001-2-6; Revision:0; Date 01.07.2012. The mill has established Emergency Response Team lead by the Mill Engineer. Fire Drill was conducted on 22/01/2022 at the mill.</p> <p>i) First aiders were present at various workstations at the mill such as ramp, boiler station and workshop. The first aiders were responsible for first aid box at each workstation assigned to them by the management. The first aid box was recently replenished with records of monthly monitoring available for verification. The latest First Aid Training was conducted on 31/03/2021.</p> <p>j) Accident records are recorded and maintained in the mill and discussed during the quarterly held JKKP Meetings. There was no reported accident for the year 2021 in the workplace. Sighted the JKKP 8 form submission to JKKP for the year 2021, submitted on 19/01/2022. 2 accident cases were reported for</p>	
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		the year 2022 as of to date. The JKKP6 forms have been submitted to DOSH accordingly and were available for verification.	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has incorporated its policy on human rights in the Group Sustainability & Quality Policy Statement mention in Indicator 4.1.1.2. Communication to employees was done through briefing during morning muster call, formal training and displayed at the notice board.	Complied
<b>4.4.5.2</b>	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. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has incorporated its policy on discriminatory in the Group Sustainability & Quality Policy Statement mention in Indicator 4.1.1.2 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age. Interview with the workers showed that there was no evidence of discrimination among the employees.	Complied
<b>4.4.5.3</b>	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. <b>- Major compliance -</b>	Employment contracts for workers were available for verification. Pay and conditions are documented and in line with the Minimum Wage Order 2020 and collective agreement. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker.  Reviewed sampled workers contract and pay slips for the month of August 2021, October 2021 and January 2022 for workers with employment ID as follows: 1. 023220 2. 162559	Complied

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		<ol style="list-style-type: none"> <li>3. 158717</li> <li>4. 150785</li> <li>5. 151891</li> <li>6. 163509</li> <li>7. 139076</li> <li>8. 158688</li> </ol>	
<b>4.4.5.4</b>	<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><b>- Minor compliance -</b></p>	<p>The mill hired contractor Noor Azlan b. Kasmani for grass cutting works in the mill compound. The contractor workers were provided with employment contracts. Pay and conditions are documented and in line with the Minimum Wage Order 2020. Reviewed the employment contracts, salary payslips and EPF and SOCSO contribution for the month of January and February 2022 for workers with ID no. as follows:</p> <ol style="list-style-type: none"> <li>1. 701126-03-XXXX</li> <li>2. 770304-06-XXXX</li> <li>3. 980831-06-XXXX</li> </ol>	Complied
<b>4.4.5.5</b>	<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><b>- Major compliance -</b></p>	<p>The mill has established the workers master list which contain information such as the Employee name, Race, Religion, Employee no., date of birth, date joined, IC/Passport no., Check roll type, Designation and Nationality.</p>	Complied
<b>4.4.5.6</b>	<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><b>- Major compliance -</b></p>	<p>All the workers were provided with fair contracts which has been explained, understand, agreed and signed by bot employee and employer. In the contract stated the terms and conditions such as:</p> <ol style="list-style-type: none"> <li>1. Transfer/secondment</li> <li>2. Salary</li> </ol>	Complied

		<ol style="list-style-type: none"> <li>3. Working hours</li> <li>4. Medical</li> <li>5. Accommodation</li> <li>6. Compliance</li> <li>7. SOCSO/Employment Injury Scheme</li> <li>8. Income tax</li> <li>9. Rest Day</li> <li>10. Public Holiday</li> <li>11. Sick leave</li> <li>12. Annual leave</li> <li>13. Maternity leave</li> <li>14. Retirement age</li> <li>15. Transportation</li> <li>16. Equipment tools</li> <li>17. Termination of service</li> <li>18. Safety and health</li> <li>19. Other terms and conditions</li> <li>20. Variation of term and conditions</li> </ol> <p>Reviewed the sampled employment contracts for workers with employment ID as follows:</p> <ol style="list-style-type: none"> <li>1. 023220</li> <li>2. 162559</li> <li>3. 158717</li> <li>4. 150785</li> <li>5. 151891</li> </ol>	
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		6. 163509 7. 139076 8. 158688	
<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. <b>- Major compliance -</b>	All the daily attendance was recorded by punch card system on daily basis and overtime was recorded in the individual card. Besides, the summary of Mill Daily Attendance Report for every month was developed and maintained as well. Reviewed the punch card and mill daily attendance report for the month of August 2021, October 2021 and January 2022 for workers with employment ID as follows: 1. 023220 2. 162559 3. 158717 4. 150785 5. 151891 6. 163509 7. 139076 8. 158688	Complied
<b>4.4.5.8</b>	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. <b>- Major compliance -</b>	All the daily attendance was recorded by punch card system on daily basis and overtime was recorded in the individual card. Sime Darby Plantation has obtained permit for overtime work not more than 130 hours per month from Peninsular Malaysia Labour Office as per letter dated 27/3/2017. Refer letter ref. no. BHG.PU/9/134 JLD 9 (11).	Complied
<b>4.4.5.9</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. <b>- Major compliance -</b>	Wages and overtime were paid according to the punch card system. Total hours of overtime and daily attendance has recorded in the individual card. The records were summarized in the summary of	Complied

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		<p>Mill Daily Attendance Report for every month. The total working days and overtime details were mentioned in the salary pay slips. Reviewed the sampled punch cards, Mill Daily Attendance Report and pay slips for the month of August 2021, October 2021 and January 2022 for workers with employment ID as follows:</p> <ol style="list-style-type: none"> <li>1. 023220</li> <li>2. 162559</li> <li>3. 158717</li> <li>4. 150785</li> <li>5. 151891</li> <li>6. 163509</li> <li>7. 139076</li> <li>8. 158688</li> </ol>	
<b>4.4.5.10</b>	<p>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.</p> <p><b>- Minor compliance -</b></p>	<p>The management has contributed 10 kg of rice once every 2 months for all their workers. Apart from that, all the workers are provided with free medical facilities. In additional, all the workers are entitled with the phone allowance of RM5 for every month. Free housing facilities were provided to all the workers and their families.</p>	Complied
<b>4.4.5.11</b>	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p><b>- Major compliance -</b></p>	<p>The mill management has provided free housing facilities to all their workers. Basic amenities such as water, electricity, football field and etc. were provided to the workers. The housing condition was in accordance to the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446).</p> <p>The mill conducted the housing complex inspection on biweekly basis. reviewed the inspection records dated 30/03/2022, 18/03/2022, and 04/03/2022</p>	Complied

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<p><b>4.4.5.12</b></p>	<p>The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.  <b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has incorporated its policy on violence and sexual harassment in the Group Sustainability &amp; Quality Policy Statement mention in Indicator 4.1.1.2 where the management is committed to prevent sexual harassment and other forms of violence. Interview with gender committee member show satisfactory understanding of sexual harassment or violence at the workplace and channel to report if occur in the mill. Noted during the interview, no evidence sexual harassment and violence at the mill.</p>	<p>Complied</p>
<p><b>4.4.5.13</b></p>	<p>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.  <b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has incorporated its policy on freedom of association in the "Group Sustainability &amp; Quality Policy Statement" mention in Indicator 4.1.1.2 where the management is committed and respect the rights of all personnel to join or form any organizations of their choice and to bargain collectively. The mill management allowed their workers to form or join any association such as NUPW. Document reviewed on their payslip found that they are deducted for the NUPW subscription fees of RM 8 monthly.</p> <p>Latest meeting between Mill Management and NUPW representative was conducted on 15/02/2022 to discuss issues related to workers. The minutes of meeting were available for verification and found properly documented. Additionally, the NUPW representative was members of Social Dialogue committee as workers representative.</p> <p>Noted during interview with the workers confirmed that they can join any trade union freely.</p>	<p>Complied</p>
<p><b>4.4.5.14</b></p>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.  <b>- Major compliance -</b></p>	<p>Sime Darby Plantation Berhad has incorporated its policy on protecting the rights of children in the Group Sustainability &amp; Quality Policy Statement mention in Indicator 4.1.1.2. Based on</p>	<p>Complied</p>

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		verification of workers register, there was no evidence that anyone below 18 years of age was recruited for employment.																	
<b>Criterion 4.4.6: Training and competency</b>																			
<b>4.4.6.1</b>	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. <b>- Major compliance -</b>	<p>Bukit Puteri POM have established a training program for all workers based on the training need analysis conducted on a yearly basis.</p> <p>COVID-19 training and briefings were sighted for the mill. Interview with the sampled workers and staff indicated that they were aware on the SOPs such as social distancing, regular sanitization and use of PPE (Face Mask).</p> <p>Records of trainings were maintained by the estates as below: -</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Briefing on Code of Business Conduct</td> <td>01/04/2022</td> </tr> <tr> <td>Briefing on Vacation Leave Pay</td> <td>28/03/2022</td> </tr> <tr> <td>Sexual Harassment Awareness Training</td> <td>11/03/2022</td> </tr> <tr> <td>LOTO Refresher Training</td> <td>07/02/2022</td> </tr> <tr> <td>Safety Briefing by DOSH</td> <td>21/02/2022</td> </tr> <tr> <td>Complaints Channel for Workers Training</td> <td>23/12/2021</td> </tr> <tr> <td>Hearing Conservation Training</td> <td>16/01/2021</td> </tr> </tbody> </table>	Training	Date	Briefing on Code of Business Conduct	01/04/2022	Briefing on Vacation Leave Pay	28/03/2022	Sexual Harassment Awareness Training	11/03/2022	LOTO Refresher Training	07/02/2022	Safety Briefing by DOSH	21/02/2022	Complaints Channel for Workers Training	23/12/2021	Hearing Conservation Training	16/01/2021	Complied
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<b>4.4.6.2</b>	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. <b>- Major compliance -</b>	SOU10 Bukit Puteri POM has conducted training need analysis for all employees, management and contractors. The training need analysis was conducted based on the job designation and training required by the job type. Sighted the Training Requirement for Operating Units (Mill – SOU 10) for the year 2022 for verification.	Complied																
<b>4.4.6.3</b>	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.	A training programme has been developed and available in the Training Requirement for Bukit Puteri POM ESH Activities for 2022. The trainings were sighted to have also included Gender Specific Training and involves staffs, workers and contractors.	Complied																

	- Minor compliance -		
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	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. <b>- Major compliance -</b>	Sime Darby Plantation Berhad have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 1/6/ 2020. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the mill.  The GSM team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition. The policy has been briefed to all workers on 11/01/2021.	Complied
<b>4.5.1.2</b>	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations <b>- Major compliance -</b>	The Environmental Impact Plan and Pollution Prevention Plan was established based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Last reviewed was done on 22/06/2021.	Complied
<b>4.5.1.3</b>	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. <b>- Major compliance -</b>	The Environmental Impact Plan and Pollution Prevention Plan was established based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to	Complied

		reflect the results of monitoring operational changes that may have positive and negative environmental impacts.	
<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	The Continual Improvement Plan has incorporated various programmes to promote the positive impacts towards the environment and was available in the Environment Management Plan, that had been subcategorized to Waste Management, Water Management, HCV Area / Biodiversity, Energy Management, GHG Reductions and Pollution Preventions.	Complied
<b>4.5.1.5</b>	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. <b>- Major compliance -</b>	Training programme was available for verification and it is reviewed on a yearly basis as per the management requirement. Included in this program are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training. Guidance was provided by the SQM prior to the approval and implementation by the estates. Training records related to environment subjects were well maintained. Trainings sighted among others are: a. Scheduled Waste Training: 21/10/2020 b. EAI & EIE Refresher Training: 22/06/2021	Complied
<b>4.5.1.6</b>	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. <b>- Major compliance -</b>	Bukit Puteri Palm Oil Mill conducts quarterly Environment Performance Monitoring Committee (EPMC) Meetings to address the environment quality, issues and opportunity for improvements. The EPMC Meeting Minutes were available for verification dated 13/01/2022	Complied
<b>Criterion 4.5.2:</b> Efficiency of energy use and use of renewable energy			

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<p><b>4.5.2.1</b></p>	<p>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</p> <p><b>- Major compliance -</b></p>	<p>The mill maintains records of energy usage, which is reported monthly to head office through SAP system. The use of the steam turbine for electricity generation has been optimized in order to reduce the dependence on diesel fossil fuel.</p> <p>Bukit Puteri POM has established baseline for non-renewable energy base on average of last 3 years usage/FFB produce. The monitoring of non-renewable energy usage was conducted annually.</p> <p>Sighted the sampled monitoring records for diesel, electricity and water usage at Bukit Puteri POM for 2021 as follows:</p> <table border="1" data-bbox="1088 715 1868 1157"> <thead> <tr> <th>Month</th> <th>Diesel (L)</th> <th>Electricity (kWh)</th> <th>Water (m³)</th> </tr> </thead> <tbody> <tr> <td>Jan 2021</td> <td>-</td> <td>40869</td> <td>5910</td> </tr> <tr> <td>Feb 2021</td> <td>1200</td> <td>41358</td> <td>5702</td> </tr> <tr> <td>Mar 2021</td> <td>-</td> <td>41942</td> <td>8792</td> </tr> <tr> <td>Apr 2021</td> <td>600</td> <td>43610</td> <td>12076</td> </tr> <tr> <td>May 2021</td> <td>1200</td> <td>39156</td> <td>11869</td> </tr> <tr> <td>Jun 2021</td> <td>1200</td> <td>37130</td> <td>12009</td> </tr> <tr> <td>Jul 2021</td> <td>600</td> <td>35074</td> <td>11821</td> </tr> <tr> <td>Aug 2021</td> <td>-</td> <td>25849</td> <td>15914</td> </tr> <tr> <td>Sep 2021</td> <td>-</td> <td>34874</td> <td>11965</td> </tr> <tr> <td>Oct 2021</td> <td>1600</td> <td>38570</td> <td>12987</td> </tr> <tr> <td>Nov 2021</td> <td>-</td> <td>28121</td> <td>1373</td> </tr> <tr> <td>Dec 2021</td> <td>2397</td> <td>38762</td> <td>9784</td> </tr> </tbody> </table>	Month	Diesel (L)	Electricity (kWh)	Water (m³)	Jan 2021	-	40869	5910	Feb 2021	1200	41358	5702	Mar 2021	-	41942	8792	Apr 2021	600	43610	12076	May 2021	1200	39156	11869	Jun 2021	1200	37130	12009	Jul 2021	600	35074	11821	Aug 2021	-	25849	15914	Sep 2021	-	34874	11965	Oct 2021	1600	38570	12987	Nov 2021	-	28121	1373	Dec 2021	2397	38762	9784	<p>Complied</p>
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<p><b>4.5.2.2</b></p>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>Bukit Puteri POM has estimation of total energy required. This estimation was compared to the actual usage on a monthly basis and reported to the head office for monitoring purposes. The estimation of total energy required is available in the annual budget prepared by the management of Bukit Puteri POM.</p>	<p>Complied</p>																																																				

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<p><b>4.5.2.3</b></p>	<p>The use of renewable energy should be applied where possible.  <b>- Minor compliance -</b></p>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of diesel for electricity, palm fiber and shells were also used to generate electricity through steam turbine and boiler.</p> <p>The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel. Monthly records of energy consumption of non-renewable and renewable fuel per metric ton of palm product at the Mill were available.</p> <p><u>Renewable Energy Summary</u></p> <table border="1"> <thead> <tr> <th>Month</th> <th>Fibre</th> <th>Shell</th> </tr> </thead> <tbody> <tr><td>Jan 2021</td><td>453.43</td><td>302.28</td></tr> <tr><td>Feb 2021</td><td>414.25</td><td>276.16</td></tr> <tr><td>Mar 2021</td><td>631.17</td><td>420.78</td></tr> <tr><td>Apr 2021</td><td>753.94</td><td>502.62</td></tr> <tr><td>May 2021</td><td>734.56</td><td>489.71</td></tr> <tr><td>Jun 2021</td><td>785.60</td><td>523.74</td></tr> <tr><td>Jul 2021</td><td>759.54</td><td>506.36</td></tr> <tr><td>Aug 2021</td><td>989.67</td><td>659.78</td></tr> <tr><td>Sep 2021</td><td>685.19</td><td>456.80</td></tr> <tr><td>Oct 2021</td><td>844.06</td><td>562.71</td></tr> <tr><td>Nov 2021</td><td>84.78</td><td>56.52</td></tr> <tr><td>Dec 2021</td><td>638.70</td><td>425.80</td></tr> </tbody> </table>	Month	Fibre	Shell	Jan 2021	453.43	302.28	Feb 2021	414.25	276.16	Mar 2021	631.17	420.78	Apr 2021	753.94	502.62	May 2021	734.56	489.71	Jun 2021	785.60	523.74	Jul 2021	759.54	506.36	Aug 2021	989.67	659.78	Sep 2021	685.19	456.80	Oct 2021	844.06	562.71	Nov 2021	84.78	56.52	Dec 2021	638.70	425.80	<p>Complied</p>
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<p><b>Criterion 4.5.3: Waste management and disposal</b></p>																																										

<p><b>4.5.3.1</b></p>	<p>All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b></p>	<p>The mill has identified the waste products and source pollution and documented in the Waste Management Plan 2022. The waste has been identified as follows:</p> <ol style="list-style-type: none"> <li>1. Domestic Waste – Household waste, Organic Waste, Sewage</li> <li>2. Industrial Waste – Scrap Metal</li> <li>3. Scheduled Waste from Mill Operation – Used Hydraulic, Lubricant, used chemical Containers, Electric Waste, used chemical Waste, cotton Rag from workshop and process.</li> <li>4. Recyclable Waste – POME, EFB</li> </ol> <p>Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be well maintained.</p>	<p>Complied</p>
<p><b>4.5.3.2</b></p>	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <ol style="list-style-type: none"> <li>a) Identifying and monitoring sources of waste and pollution.</li> <li>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</li> </ol> <p><b>- Major compliance -</b></p>	<p>Bukit Puteri POM have established the waste management plan and the plan was reviewed on an annual basis.</p> <p>The mill has identified the waste products and source pollution and documented in Waste Management Plan 2022. The waste has been identified as follows:</p> <ol style="list-style-type: none"> <li>1. Domestic Waste – Household waste, Organic Waste, Sewage</li> <li>2. Industrial Waste – Scrap Metal</li> <li>3. Scheduled Waste from Mill Operation – Used Hydraulic, Lubricant, used chemical Containers, Electric Waste, used chemical Waste, cotton Rag from workshop and process.</li> <li>4. Recyclable Waste – POME, EFB</li> </ol> <p>In the management plan stated the type of waste, source of waste, mitigation plan and person responsible.</p>	<p>Complied</p>
<p><b>4.5.3.3</b></p>	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under</p>	<p>Procedure for Scheduled Waste Management was established (SD/SDP/PSQM (ESH)/203-EN1 dated 26/02/2016. Proper disposal</p>	<p>Complied</p>

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	<p>Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p><b>- Major compliance -</b></p>	<p>of waste material is carried out as per the company procedures. The procedures are fully understood by workers staffs and executives.</p> <p>Bukit Puteri POM also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Observed during interview with storekeeper shows the understanding of the proper disposal of waste as all used lubricant and contaminated spill kit will be collected as Scheduled Waste and stored in designated storage area prior to disposal.</p> <p>All the records were found adequate as per required by EQ (Scheduled Waste) Regulations 2005.</p> <p>Sighted the sampled scheduled waste disposal records:</p> <ul style="list-style-type: none"> <li>• Consignment Number: 2021102916WMQ1BD; Date Submitted: 29/10/2021; Waste Code: SW409; Waste Name: Spent Containers, Bags and Equipments; Quantity: 0.0920 Mt; Name of Contractor: Kualiti Alam Sdn Bhd.</li> <li>• Consignment Number: 2021102916FLQREO; Date Submitted: 29/10/2021; Waste Code: SW410; Waste Name: Spent Rags, Oil Filter, Plastic &amp; Papers; Quantity: 0.0547 Mt; Name of Contractor: Kualiti Alam Sdn Bhd.</li> <li>• Consignment Number: 2021102916R36SQ7; Date Submitted: 29/10/2021; Waste Code: SW322; Waste Name: Spent Hexane &amp; IPA; Quantity: 0.2090 Mt; Name of Contractor: Kualiti Alam Sdn Bhd.</li> </ul>	
<p><b>4.5.3.4</b></p>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p>	<p>Domestic waste from the mill housing is handled by Bukit Puteri Estate management through utilisation of landfill.</p>	<p>Complied</p>

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	- Minor compliance -																	
<b>Criterion 4.5.4:</b> Reduction of pollution and emission																		
<b>4.5.4.1</b>	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>An assessment plan for all identified polluting activities was established based on the Environment Aspect and Impact assessment. Polluting activities were monitored based on DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling. Besides that, the mill also monitors the Green House Gas emission and recyclable waste.</p> <p>Observed the Isokinetic Stack &amp; Air Emission Monitoring Report conducted by Alam Hijau Integrasi (M) Sdn Bhd. as follows:</p> <table border="1"> <thead> <tr> <th>Descriptions</th> <th>Boiler No.2</th> <th>Chimney No.2</th> </tr> </thead> <tbody> <tr> <td>Period</td> <td>1<sup>st</sup> Half 2021</td> <td>2<sup>nd</sup> Half 2021</td> </tr> <tr> <td>Date of Measurement</td> <td>04/02/2021</td> <td>08/10/2021</td> </tr> <tr> <td>Dust Concentration</td> <td>31.2 mg/m<sup>3</sup></td> <td>29.9 mg/m<sup>3</sup></td> </tr> <tr> <td>Carbon Monoxide, CO</td> <td>&lt;01 mg/m<sup>3</sup></td> <td>18.4 mg/m<sup>3</sup></td> </tr> </tbody> </table> <p>The emission level of Total Particulate matter @ 12% CO<sub>2</sub> for the boilers monitored were within the Malaysian Environmental Quality (Clean Air) Regulations 2014.</p>	Descriptions	Boiler No.2	Chimney No.2	Period	1 <sup>st</sup> Half 2021	2 <sup>nd</sup> Half 2021	Date of Measurement	04/02/2021	08/10/2021	Dust Concentration	31.2 mg/m <sup>3</sup>	29.9 mg/m <sup>3</sup>	Carbon Monoxide, CO	<01 mg/m <sup>3</sup>	18.4 mg/m <sup>3</sup>	Complied
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<b>4.5.4.2</b>	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>Bukit Puteri POM have established a Pollutions Preventive Management Plan 2022. The plan has identified the possible issues within the mill that may lead towards pollution. The plan consists of the pollution source, specific concerns, means of mitigation, means of monitoring and action plan, person in charge and compliance status.</p> <p>Among the pollution issues identified are as follows:</p> <table border="1"> <thead> <tr> <th>Specific Concerns</th> <th>Means of Mitigations</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Specific Concerns	Means of Mitigations			Complied											
Specific Concerns	Means of Mitigations																	

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		<p><u>Workshop</u> Oils, Lubricants Grease &amp; Fuels Solvents</p>	<p>Containment via bunds and proper flooring; spillage kits; oil trap; disposal as scheduled waste.</p>													
		<p><u>Linesite</u> Solid Waste</p>	<p>Proper Waste Management</p>													
		<p><u>Linesite</u> Open Burning of Domestic Waste</p>	<p>Awareness and Supervision</p>													
		<p><u>Effluent</u> Water Pollution</p>	<p>Effluent been treated before discharge to waterways.</p>													
		<p><u>Emission</u> Air Pollution (Smoke)</p>	<p>Daily Monitoring Smoke Density recorder.</p>													
<p><b>4.5.4.3</b></p>	<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. <b>- Major compliance -</b></p>	<p>The mill applies the biological system with 14 ponds in series for its treatment of effluent. The mill is disposing its effluent to the water ways. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&amp;G, AN and TN. DOE standards. Monthly and quarterly report was submitted to DOE accordingly. Sighted the Effluent Analysis Test Report Results as follows:</p> <ul style="list-style-type: none"> <li>- Test Report Number: EP87/2022</li> <li>- Date Sampled: 10/02/2022</li> <li>- Results:</li> </ul> <table border="1" data-bbox="1137 1198 1877 1265"> <thead> <tr> <th>pH</th> <th>BOD</th> <th>SS</th> <th>TN</th> <th>AN</th> <th>O&amp;G</th> </tr> </thead> <tbody> <tr> <td>8.6</td> <td>50</td> <td>60</td> <td>26</td> <td>6</td> <td>3</td> </tr> </tbody> </table> <p>The results indicated that the pH does conform with the parameter limits for watercourse discharge.</p>	pH	BOD	SS	TN	AN	O&G	8.6	50	60	26	6	3	<p>Complied</p>	
pH	BOD	SS	TN	AN	O&G											
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Criterion 4.5.5: Natural water resources		
<p><b>4.5.5.1</b></p> <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> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> </ul> <p><b>- Major compliance -</b></p>	<ul style="list-style-type: none"> <li>1. Water Management was established and verified to state the following:               <ul style="list-style-type: none"> <li>a. Protection of watercourse                   <ul style="list-style-type: none"> <li>• To monitor the water quality by sending water sampling for analysis by R&amp;D.</li> </ul> </li> <li>b. Contingency during water shortage                   <ul style="list-style-type: none"> <li>• To purchase water supply from Perbadanan Air Pahang</li> <li>• To train staff and workers to take necessary steps to conserve water</li> </ul> </li> <li>c. Severe Water Pollution / Contamination                   <ul style="list-style-type: none"> <li>• To purchase water supply from Perbadanan Air Pahang</li> </ul> </li> </ul> </li> <li>2. Water Usage is monitored by the mill on a monthly basis. The data have been detailed out under indicator 4.5.2.3.</li> <li>3. Water Quality for Domestic use is monitored on a monthly basis at the mill. The Water Analysis Test Report (Test Report Number: IE251/2022), Sampled on 17/02/2022 and Report issued on 01/03/2022. The results did not conform with the NSDWG for domestic use. A minor non-conformity has been raised under indicator 4.6.1.1 due to action not being taken according to the standard procedures.</li> <li>4. Water Analysis Test Report (IE315/2022) sampled on 09/03/2022 was available for verification. The results dated 24/03/2022 indicated that samples taken at 2 sampling points (Hulu – 300 Meter from Final Discharge and Hilir – 300 Meter from Final Discharge) does conform with the Class IIA/IIB of NWQS for Natural Waterways.</li> </ul>	<p>Complied</p>

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<p><b>4.5.5.2</b></p>	<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.  <b>- Major compliance -</b></p>	<p>As of now there are no plans to gradually phase out the discharge of POME into the water course. Nevertheless, the mill ensures all environmental requirements that have been detailed out in the DOE Compliance schedule are compiled to.</p>	<p>Complied</p>
<p><b>4.6 Principle 6: Best Practices</b></p>			
<p><b>Criterion 4.6.1: Mill Management</b></p>			
<p><b>4.6.1.1</b></p>	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  <b>- Major compliance -</b></p>	<p>The mill processing system is documented in the Sustainability Plantation Management System MQMS/SQM/08 v 1 dated 01/11/2008 which includes:</p> <ul style="list-style-type: none"> <li>a. The mill SOP</li> <li>b. The Mill Quality Management Manual v.1 2008/MQMS/QMM/08.</li> </ul> <p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from:</p> <ul style="list-style-type: none"> <li>a. the reception, sterilization, threshing, pressing,</li> <li>b. clarification, depericarping (nut polishing) station,</li> <li>c. effluent, laboratory, workshop, dispatches etc.</li> </ul> <p>Sime Darby Plantation Berhad has established a system to monitor the mill operation. The Mill advisor, Structured Oil Recovery Assessment (SORA) and Performance Monitoring Unit (PMU) visits the operating units on timely basis. Their reports cover on all aspect of operation where they rate the performance of the mill and estates.</p>	<p>Minor Non-Conformity</p>

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		<p>Nevertheless, lapses in the implementation of procedures were acknowledged as below:</p> <p>Water Quality for Domestic use is monitored on a monthly basis at the mill. The Water Analysis Test Report (Test Report Number: IE251/2022), Sampled on 17/02/2022 and Report issued on 01/03/2022. As per the SOP, Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results, the mill is required to raise a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results and the resampling has to be done within 7 days. The Mill has not raised a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results and the resampling has not been done as of to date. Hence a Minor Non-Conformity has been raised.</p>	
<b>4.6.1.2</b>	<p>All palm oil mills shall implement best practices.</p> <p><b>- Major compliance -</b></p>	<p>The monitoring of the mill process is made through the shift supervision headed by assistant mill managers. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits by Regional General Manager, Mill Advisor, SQM and GCAD. This is to ensure compliance with policies, procedures in relation mill operations, financial, OSH, welfare to name a few.</p>	Complied
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
<b>4.6.2.1</b>	<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><b>- Major compliance -</b></p>	<p>The annual business plan is available. The document is in the form of annual budget and the projection for 5 years (2022-2027) prepared as guidance for future planning. The business plan contains:</p> <p>a. FFB processed production of CPO &amp; CPK.</p>	Complied

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		<p>b. Component of operating expenditure includes</p> <ul style="list-style-type: none"> <li>- process labour,</li> <li>- maintenance external/maintenance parts</li> <li>- consumable/EVIT,</li> <li>- admin cost/labour overhead.</li> </ul> <p>Inclusive in the business plan is also Capital Expenditure (CAPEX) among others replacement / upgrading of building/machinery, workers amenities for the mill. The M Plan for 2022 was made available for verification which include the calculation of seeking the profitability quantum. This is a standard format provided from the Regional CEO to the Manager and treated in high confidentiality.</p>	
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p><b>- Major compliance -</b></p>	<p>The pricing mechanism was conducted as per contract agreement between the FFB Supplier and The China Engineers Malaysia Sdn. Bhd (subsidiary of Sime Darby Plantation Berhad). Stated in the agreement under section 8. Pricing of the FFB shown in the Third Schedule in the contract agreement. Sighted sampled contract between FFB Supplier and The China Engineers Malaysia Sdn. Bhd as follows:</p> <ol style="list-style-type: none"> <li>1. Atil Mela Enterprise, contract no. P/C/1221/FFB03314L</li> <li>2. MXF Gemilang Enterprise, contract no. P/C/1221/FFB03313L</li> <li>3. Noor Azlan bin Kasmani, contract no. P/C/1221/FFB03307L</li> </ol>	Complied
<b>4.6.3.2</b>	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p><b>- Major compliance -</b></p>	<p>Sighted sampled contract between FFB Supplier and Sime Darby Plantation Berhad as follows:</p> <ol style="list-style-type: none"> <li>1. Atil Mela Enterprise, contract no. P/C/1221/FFB03314L</li> <li>2. MXF Gemilang Enterprise, contract no. P/C/1221/FFB03313L</li> </ol>	Complied

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		<p>3. Noor Azlan bin Kasmani, contract no. P/C/1221/FFB03307L</p> <p>4. Letter of Awards and Acceptance (LOA) to Noor Azlan bin Kasmani no. BPOM/ITQ/OPEX0001/2022 dated 04/01/2022</p> <p>Payment for FFB purchased has been stated in the contract agreement under section 9. Payment and set out in Section 5 of the First Schedule.</p> <p>Reviewed the sampled payment for Noor Azlan bin Kasmani (contract no. BPOM/ITQ/OPEX0001/2022) as per invoice no. IV00312 and payment voucher no. 160000951 dated 05/04/2022.</p>	
<b>Criterion 4.6.4: Contractor</b>			
<p><b>4.6.4.1</b></p>	<p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p><b>- Major compliance -</b></p>	<p>The contractors were made to understand the MSPO requirements and shall provide the required documentation and information through meetings and trainings. Records of attendance of the meetings were available for verification.</p> <p>All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with para</p> <ul style="list-style-type: none"> <li>- a (i); Vendor Code of Business Conduct (VCOBC)</li> <li>- a (ii); all applicable laws and regulations related anti-bribery, fraud and corruption.</li> </ul> <p>Reviewed the sampled contracts as per Letter of Awards and Acceptance (LOA) to Noor Azlan bin Kasmani no. BPOM/ITQ/OPEX0001/2022 dated 04/01/2022</p>	<p>Complied</p>
<p><b>4.6.4.2</b></p>	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p><b>- Major compliance -</b></p>	<p>Contract agreements between the mill and its contractors were made available. Generally, the elements of sustainability such as obligations to legal compliance, workers' welfare, safety and environmental issues.</p>	<p>Complied</p>

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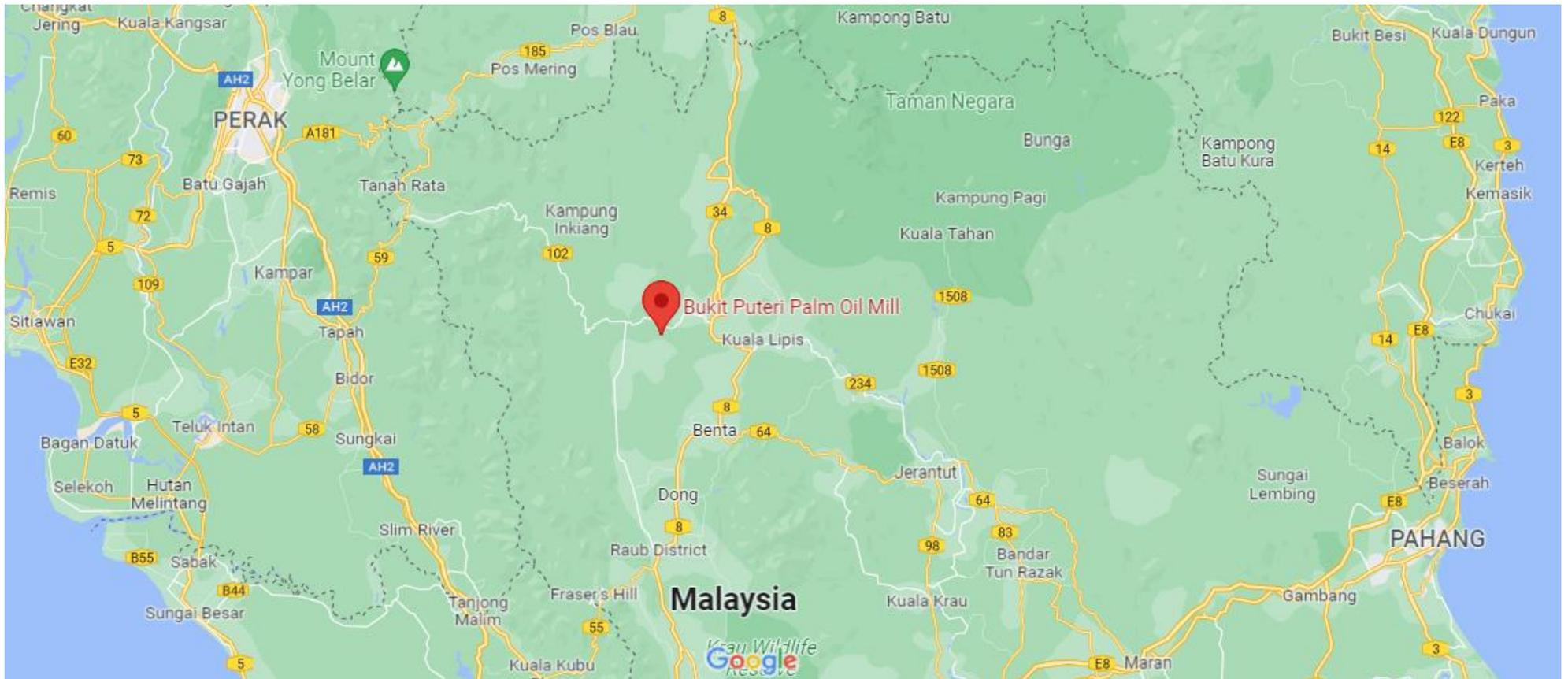
<p><b>4.6.4.3</b></p>	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p><b>- Minor compliance -</b></p>	<p>Sime Darby Plantation Berhad has issued Memorandum to all contractors dated 26/6/2019. In the memorandum stated the contractors have to comply as follows.</p> <ul style="list-style-type: none"> <li>a. Comply with local legal requirements</li> <li>b. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company</li> <li>c. Having signed and enforceable agreement with the company</li> <li>d. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary</li> <li>e. Having related working permits</li> <li>f. Ensure PPE utilization by contractors' employee while being in the company premise.</li> </ul> <p>Additionally, all contracted parties/vendors have signed the 'Agreement Letter to be Audit by MSPO/SCCS Auditor'.</p> <p>Sighted the agreement letter accepted and signed by Noor Azlan bin Kasmani dated 21/12/2020.</p>	<p>Complied</p>
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**Appendix B: Smallholder Member Details**

Not Applicable

**Appendix C: Location and Field Map**

SOU 10 Bukit Puteri Palm Oil Mill





**Appendix D: 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