

RSPO PRINCIPLE AND CRITERIA**1st Annual Surveillance Assessment
Public Summary Report**

Sime Darby Plantation Berhad
Head Office: Level 3A, Main Block Plantation Tower, No. 2, Jalan P.J.U 1A/7 47301 Ara Damansara Selangor, Malaysia
Strategic Operating Unit (SOU 22) Bukit Benut Palm Oil Mill KM 12, Jalan Mengkibol 86009 Kluang, Johor Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0008-04-000-00	Date	Member since: 6 September 2004
Company Name	Sime Darby Plantation Berhad		
Address	Head Office: Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia Certification Unit: Strategic Operating Unit (SOU 22) – Bukit Benut Palm Oil Mill, KM 12, Jalan Mengkibol 86009 Kluang, Johor, Malaysia		
Subsidiary of (if applicable)	N/A		
Contact Name	Mdm. Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr Khaizarudin Bin Awaludin (Mill Manager)		
Website	www.simedarby.com	E-mail	Shylaja.vasudevan@simedarby.com kks.bk.benut@simedarby.com
Telephone	+603-78484379 (Head Office) +607-7723479 (Mill)	Facsimile	+603-78484356 (Head Office) +607-7766479 (Mill)

2. Certification Information			
Certificate Number	RSPO 591229	Original Certificate Issued Date	05/10/2011
		Expiry Date	04/10/2021
Scope of Certification	Palm Oil and Palm Kernel Production from Bukit Benut Palm Oil Mill and Supply Base (Bukit Benut Estate, CEP Nyior Estate, Lambak Estate)		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
A0119	ISO 9001 QMS (Bukit Benut Mill)	SIRIM QAS International	29/09/2017
AR1094	ISO 9001 QMS (Bukit Benut Estate)	SIRIM QAS International	08/07/2018

3. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Easting	Northing
Bukit Benut Palm Oil Mill (20 mt/hr)	KKS Bukit Benut, PO Box 513, 86009 Kluang, Johor	103° 20' 28"	1° 56' 00"
Bukit Benut Estate	Ladang Bukit Benut, PO Box No. 513, 86009 Kluang, Johor	103° 21' 54"	1° 54' 42"

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CEP Nyior Estate	Ladang CEP Nyior, K/B No. 514 86009 Kluang, Johor	103° 16' 22"	1° 54' 30"
Lambak Estate	Ladang Lambak/Elaeis, PO Box 510, 86009 Kluang, Johor	103° 19' 08"	1° 58' 43"

4. Description of Supply Base

Estate	Mature (ha)	Immature (ha)	Total Planted (ha)	HCV (ha)	Infras & Other (ha)	Total Hectarage	% of Planted
Bukit Benut Estate	2,178.45	401.98	2,580.43	-	220.70	2,801.13	92
CEP Nyior Estate	978.38	509.52	1,487.90	-	50.84	1,538.74	97
Lambak Estate	3,137.79	183.02	3,320.81	32.94	391.01	3,744.76	89
Total	6,294.62	1,094.52	7,389.14	32.94	662.55	8,084.63	91

5. Plantings & Cycle

Estate	Age (Years)					Tonnage / Year		
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Estimated (July 2016 – June 2017)	Actual (July 2016 – June 2017)	Forecast (July 2017 – June 2018)
Bukit Benut Estate	401.98	1033.11	1058.78	86.56	0	41,875.61	35,619.20	41,100
CEP Nyior Estate	509.52	509.52	398.21	0	70.65	27,468.95	7,633.51	7,800
Lambak Estate	183.02	1369.6	1035.73	732.46	0	66,033.00	55,724.83	67,473
Total	1,094.52	2912.23	2492.72	819.02	70.65	135,377.56	98,977.54	116,373

6. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year		
	Estimated (July 2016 - June 2017)	Actual (July 2016 – June 2017)	Forecast (July 2017 – June 2018)
Bukit Benut Estate	41,875.61	35,619.20	41,100
CEP Nyior Estate	27,468.95	7,633.51	7,800
Lambak Estate	66,033.00	55,724.83	67,473
Total	135,377.56	98,977.54	116,373

**FFB from CEP Nyior diverted out to other Sime Daby's certified management unit.*

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7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (July 2016 – July 2017)	Actual (July 2016 – July 2017)	Forecast (June 2017 – July 2018)
Not applicable.			

8. Certified Tonnage (Own Certified Scope)									
Mill	Estimated (July 2016 – July 2017)			Actual (July 2016 – July 2017)			Forecast (June 2017 – July 2018)		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Bukit Benut Palm Oil Mill	135,377.56	29,783.06	7,445.77	98,977.54	20,537.84	4,691.54	116,373	26,183.93	6,388.88
OER/KER%	-	22%	5.5%	-	20.75%	5.5%	-	22.50%	5.49%

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: RSPO-ACC-19)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-19) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia. BSI is accredited for RSPO Supply Chain Certification Systems (SCCS) and Principles & Criteria for Sustainable Palm Oil Production (P&C, Single Site & Group) certification Worldwide.

Assessment Methodology, Programme, Site Visits

This 1st Annual Surveillance Assessment was conducted from 19-21 July 2017. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (Bukit Benut Estate & Lambak Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2014 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base. The estates sample were determined based on formula $N = 0.8\sqrt{y}$ where y is the number of estates while when applicable.

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

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

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

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

This report was internally reviewed by approved Certification Reviewer prior to certification decision by BSI

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

1. Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Bukit Benut Palm Oil Mill	√	√	√	√	√
Bukit Benut Estate		√		√	√
Lambak Estate	√	√	√		√
CEP Nyior Estate	√		√	√	

[Click here to enter a date.](#)

Tentative Date of Next Visit: July 18, 2018 – July 20, 2018

Total No. of Mandays: 9 mandays

BSI Assessment Team:

Mohamed Hidhir Zainal Abidin – Lead Auditor

He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.

Hoo Boon Han – Team Member

He holds Master of Technology (Environmental Management) from the University Malaya and Bachelor of Science Forestry (Hons) Majored in International Tropical Forestry from University Malaysia Sabah. He has more than 3 years working experience in in environmental monitoring & audit, carbon accounting & reduction, wastewater treatment, waste management and sustainable development. He has successfully completed the RSPO Lead Auditor and RSPO Supply Chain Training in April 2012. He has been involved in RSPO P&C audit in Indonesia and Malaysia as well as RSPO SC audit across different region including Asia, Europe and North America for the past 4 years. During this assessment, he assessed on the aspect of environment, Safety and Health, Legal, social and community engagements, stakeholders consultation, and workers welfare. He is able to speak and understand Bahasa Malaysia, English and Mandarin.

Hu Ning Shing - Team Member

She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in his previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.

Accompanying Persons: -**Section 3: Assessment Findings****3.1 Details of audit results**

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

- Sime Darby Plantation Sdn Bhd Time Bound Plan
- RSPO P&C MY-NIWG 2014 Checklist
- RSPO Supply Chain Certification Checklist November 2014

3.2 Progress against Time Bound Plan

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

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

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

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appropriateness of the time-bound plan at the moment of first acceptance and shall only check continued appropriateness". BSI understands that there are community issue still under negotiation through agreed process.

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

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

BSI has continued involvement with assessments of Sime Darby Management Units during the 2014 period and beginning 2015. BSI is also communicating with other Certification Bodies that auditing Sime Darby's other operating units to identify any noncompliance with rules of partial certification as per requirement in RSPO Certification System. During this assessment BSI has contacted the certification body that audited PT MAS to get the latest update of the progress. Sime Darby consistently has kept BSI informed of any emerging issues and claims made against it. Other than the PT MAS issue, at the time of preparation of this Report, BSI is not aware of any new issues involving:

- a. Any unresolved significant land disputes;
- b. Any replacement of primary forest or loss of HCVs;
- c. Any labour disputes that are not being resolved through an agreed process;
- d. Any evidence of noncompliance with any law at any of the landholdings.

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	The time bound plan includes all SOUs in Malaysia and Indonesia. Malaysia- Effectively 34 SOUs: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. Indonesia- Effectively 25 SOUs. For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017.	Yes

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<p>Is the time bound plan challenging?</p> <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	<p>Sime Darby Plantation's time bound plan for certification is initially 3 years, starting 2008 – 2011. SDP has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets). The 2 new mills have been RSPO Certified in Jan and Feb 2014.</p> <p>For Indonesian operations, currently, 1 SOU in Indonesia (PT MAS) is pending for RSPO Certification due to social legacy issues.</p> <p>SDP's is actively working on its certification targets given the span across a large geographical location and over 200 estates and mills in operation.</p>	<p>Yes</p>
<p>Have there been any changes since the last audit? Are they justified?</p>	<p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes and a new oil mill in Liberia has been commissioned in Feb 2016.</p> <p>SDP's time bound plan has been revised to take into consideration the social challenges encountered in Indonesia for the remaining SOU (PT MAS) yet to be certified.</p> <p>Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter.</p>	<p>Yes</p>

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

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<p>Did the company conduct an internal audit? If so, has a positive assurance statement been produced?</p>	<p>Indonesia - PT Mitra Austral Sejahtera has undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO for Partial Certification and the report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. Reports on the progress update are submitted to RSPO on a regular basis since November 2012. The latest progress report submitted to RPSO dated 30th June 2016.</p> <p>Further details please refer to the RSPO Complaints Website: http://www.rspo.org/members/complaints/status-of-complaints/view/29</p> <p>Liberia – New mill commissioned in Feb 2016, identification of gaps and preparation to meet the requirements of the RSPO P&C is in progress.</p>	<p>Yes</p>
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p>	<p>Yes</p>
<p>Any new plantings since January 1st 2010 must comply with the RSPO New Plantings Procedure.</p>	<p>A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p> <p>*Note: RSPO NPP Announcements for SDP can be http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</p>	<p>Yes</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.</p>	<p>Sime Darby (Liberia) Plantation Inc. Status: Box H - Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46</p> <p>PT Mitra Austral Sejahtera (Sime Darby Sdn Bhd) Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/29</p>	<p>Yes</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.</p>	<p>No stakeholder comments or complaints received.</p>	

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Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	None noted. No stakeholder comments or complaints received.	Complied.
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3.3 Details of findings

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

During the 1st Annual Surveillance Assessment there were 5 (five) minor nonconformities raised. The Bukit Benut Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1503698-201707-N1	Requirements Indicator 6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.	Minor
	Evidence of Nonconformity During site visit to the linesite in Lambak Estate found that the whole stretch of the drain in front of House No. 29B (P-11/2011) was blocked. It was also observed that breeding of mosquitoes larvae was happened in that drain.	
	Statement of Nonconformity Linesite inspection was not implemented effectively.	
	Corrections Medical Assistant have been trained to improve the method of inspection by using standard of Linesite Inspection Form are in the process of identifying reliable contractor to carry out the drain repaired at linesite (house No. 29B)	
	Corrective Actions Estate Management will monitor on the linesite inspection / condition on weekly interval.	
	Assessment Conclusion The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1503698-201707-N2	Requirements Indicator 6.9.3 A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels	Minor

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of the workforce.	
Evidence of Nonconformity SDPSB has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. According to the handbook, the meeting shall be conducted quarterly (every 3 months once). However, in Lambak Estate, the meeting was conducted once a year and the last meeting was conducted on 19/7/2017 and 25/5/2016.	
Statement of Nonconformity Frequency of the meeting was not accordance to the Gender Committee Handbook.	
Corrections Lambak Estate Gender Committee team have appointed new Chairman (Pn. Mazlina Major, Chief Clerk) and to plan proper Meeting at three monthly interval.	
Corrective Actions Lambak Estate management will monitor on the Gender Committee meeting's schedule accordingly	
Assessment Conclusion The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1503698-201707-N3	Requirements Indicator 5.1.2 Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.	Minor
	Evidence of Nonconformity In Bukit Benut and Lambak/ Elaeis estate, environment management plan FY2016/17 is not develop and implemented comprehensively as it not reflecting the significant risk according to the evaluation of environmental aspect and impact FY2016/2017.	
	Statement of Nonconformity Environment management plan is not develop and implemented comprehensively.	
	Corrections Review of Environmental Management plan available were done by the Estate management and SQM personnel.	
	Corrective Actions Estate management to continuously monitor on the environmental impact available and to observe the effectiveness of the action plan taken.	
	Assessment Conclusion	

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	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1503698-201707-N4	<p>Requirements Indicator 4.7.3 All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning</p> <p>Evidence of Nonconformity Bukit Benut Estate Observed at block 97B, CDA sprayer gang was not provided with eye protection @ goggles as per Sime Darby's Pictorial Safety Standard.</p> <p>Statement of Nonconformity Adequate and appropriate protective equipment was not made available to all workers at the place of work.</p> <p>Corrections Provide safety glasses to all sprayers</p> <p>Corrective Actions</p> <ol style="list-style-type: none"> 1) To conduct a refresher training on chemical handling and emphasize on the PPE usage. 2) To provide safety glasses and allow feedbacks from workers on the suitability of the usage for the sprayers. Improvement on the selection of safety glasses will be done where necessary. 3) To ensure that continuous supervision and monitoring on the PPE usage (Control : Workplace Inspection) <p>Assessment Conclusion The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit</p>	Minor

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1503698-201707-N5	<p>Requirements Indicator 4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed</p>	Minor

	<p>Evidence of Nonconformity Bukit Benut Palm Oil Mill i)Expired item (antiseptic solution @ Dettol) with date of expiry 15/1/17 was found in the first aid box at mill’s workshop. ii)Based on the inspection records, only 8 out of 10 first aid boxes were inspected and replenished since December 2016 which has not included the first aid box located at mill's workshop</p>	
	<p>Statement of Nonconformity Emergency preparedness was not effectively implemented.</p>	
	<p>Corrections Replaced new antiseptic solution @ Dettol by Medical Assistant of Bukit Benut Estate in the relevant box (expired items).The First Aid box checklist were updated and all items were replenished accordingly.</p>	
	<p>Corrective Actions 1) Person in-Charge been appointed to monitor and update to mill executive on monthly basis.(to be recorded) PIC – En.Aimi Sulong (Lab Analyst) 2) Once a month the first aid box must be presented to BBE MA for verification to ensure this non-conformance from recurring (to be recorded) 3) To conduct a refresher training on First Aid which covers usage of First Aid and emphasize on the monitoring of the items to all first aider</p>	
	<p>Assessment Conclusion The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit</p>	

Observation	
OBS #	Description
1	Nil

Positive Findings	
PF #	Description
1.	External stakeholders for the mill and estates shown positive feedbacks towards the company.
2.	Substitution of chemical used for bagworm treatment, Acephate

Issues raised by Stakeholders
<p>Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Bukit Benut Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.</p> <p>Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. These have been incorporated into the assessment</p>

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findings.

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

IS #	Description
1	<p>Issues: Gender Committee Chairman and members – No sexual harassment case was reported. They are well understood the complaint procedure.</p> <p>Management Responses: The management will continue to monitor to ensure no sexual harassment case happened.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Issues: Contractors – They signed and understood on the contract agreement prior to work. The payment was paid directly from Sime Darby Head Office and no delay in payment.</p> <p>Management Responses: The management will send the work sheets to the Head Office for payment process without any delay.</p> <p>Audit Team Findings: No other issue.</p>
3	<p>Issues: JKKK Kg. Mengkibol and JKKK Bukit Benut – The Head of Village informed that no encroachment of their land by SDPSB. There was trenches and boundary stones to differentiate their land.</p> <p>Management Responses: The management will ensure no encroachment or overplanting to local communities’ land.</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Issues: NUPW representative and Workers’ Representative – They informed that their salary was achieved Minimum Wage Order 2016. Housing conditions were satisfied and provided with free medical facilities. Foreign workers were treated equally as the local where no discrimination happened.</p> <p>Management Responses: The management will ensure the compliance of regulations and treated all workers equally.</p> <p>Audit Team Findings: Document reviewed on the payslip confirmed that their salary have achieved Minimum Wage Order 2016.</p>
5	<p>Issues: Chemical Mandore- All the PPE provided by the company. If any emergency during mixing will move to the clinic which next to the mixing area. No issue on the housing and payment.</p> <p>Management Responses: Management always put safety as the priority.</p> <p>Audit Team Findings: No other comment.</p>
6	<p>Issues: Workshop worker- Waste oil will send to schedule waste store for disposing. Oil trap being inspect and clean on weekly basics.</p> <p>Management Responses: Management will continue maintain the monitoring all the pollution source.</p>

	Audit Team Findings: No other comment.
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3.3.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1359037M1	Requirements Indicator 2.1.1 Evidence of compliance with relevant legal requirements shall be available.	Major
	Evidence of Nonconformity Lambak Estate: Diesel storage permit has been expired since June 2016.	
	Statement of Nonconformity Evidence of compliance with legal requirements for Diesel Storage Permit was not available.	
	Corrections Communicate with Jabatan Bomba Daerah Kluang for the inspection and verify the skid tank. The formal letter has been submitted to the Jabatan Bomba on 12/8/2016.	
	Corrective Actions Master list of all permits and licenses with validity date/expiry date have been established. The major NC was closed on 5/9/2016	
	Assessment Conclusion Diesel permit is found valid at all visited operating units. Bukit Benut Estate - Diesel & Petrol Permit # J030513 valid till 23 Jul 2018 Lambak Estate - Diesel & Petrol Permit # J029739 valid till 12 Apr 2018 The major NC is remain closed. No recurrences of issue noted	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1359037M2	Requirements Indicator 4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.	Major
	Evidence of Nonconformity Lambak Estate: Specific annual medical surveillance for pesticide operators were yet to be conducted for year 2016. Further verification indicates that the scheduling and arrangement of specific annual medical surveillance for pesticide operators for year 2016 has exceeded 12 months interval period. The last medical surveillance for pesticide operators were conducted on 12/1/15.	
	Statement of Nonconformity Specific annual medical surveillance for pesticide operators were not effectively	

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demonstrated.	
Corrections Propose to conduct medical surveillance for pesticide operators during month of August 2016. A letter was sent to OHD dated on 28.07.2016	
Corrective Actions Healthcare Assistant (HA) as a responsible person to ensure the annual medical surveillance and health surveillance to be carried out timely. The major NC was closed on 5/9/2016	
Assessment Conclusion Lambak Estate Medical surveillance for 2016 was carried out on 22-25/8/16 for total of 41 workers for different type of work units (workshop, spraying, trunk injector and water pump operator). Verified the medical report by registered OHS, HQ/08/DOC/597 under Klinik Renggam and found all workers are fit to work without any occupational related disease. The major NC is remain closed. No recurrences of issue noted	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1359037M3	<p>Requirements Indicator 4.7.6 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>Evidence of Nonconformity There are no records or document to confirm that the workers were given the extended contract of employment and acknowledged signed the extension of employment. Bukit Benut POM: One of the worker's (passport no: AR470460) contract already expired without any extension. The contract only valid from 22 Aug 2012 to 21 Aug 2015. Lambak /Elaeis Estate: Employee Number 0000067076: Employment contract expired on 31/07/2014 Employee Number 0000069743: Employment contract expired on 28/02/2015 Employee Number 0000084936: Employment contract expired on 30/06/2016 CEP Niyor Estate: Employee Number 0000055372: Employment contract expired on 23/09/2013 Employee Number 0000084005: Employment contract expired on 19/10/2015 Employee Number 0000055371: Employment contract expired on 23/09/2013</p> <p>Statement of Nonconformity Extension contract of employment for the workers is not available.</p> <p>Corrections New contract of employment had been issued and filed in month of August 2016. Estate management to reissue the extension contract agreement to the respective workers.</p> <p>Corrective Actions</p>	Major

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	<p>Chief clerk as a person in-charge and ensure the extension employment contracts available and will review regularly on yearly basis. The major NC was closed on 29/9/2016</p> <p>Assessment Conclusion Extension contract for the workers above and others were sampled as below :</p> <ul style="list-style-type: none"> a. Employee No.: 82925; Expiry Date: 21/8/2017 (BBPOM) b. Employee No.: 80433; Expiry Date: 7/6/2018 (BBE) c. Employee No.: 64411; Expiry Date: 7/4/2018 (BBE) d. Employee No.: 17724; Expiry Date: 10/11/2017 (BBE) e. Employee No.: 96852; Expiry Date: 1/11/2017 (BBE) f. Employee No.: 67076; Expiry Date: 30/5/2018 (LE) g. Employee No.: 73237; Expiry Date: 16/10/2017 (LE) h. Employee No.: 66132; Expiry Date: 12/5/2018 (LE) <p>Thus, the implementation of corrective action was found effective. The major NC is remain closed.</p>	
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Non-Conformity

NCR #	Description	Category (Major / Minor)
1359037M4	<p>Requirements Indicator 5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.</p> <p>Evidence of Nonconformity Lambak Estate: Noted the demolished bungalow debris was still left unmanaged, schedule waste records (inventory and consignment note) yet to be updated the Lambak Estate.</p> <p>Statement of Nonconformity Previous Minor Non-conformity corrective action implementation plan was ineffective. Thus this Minor Non-conformity been escalated to Major Non-conformity.</p> <p>Corrections 1) Communicated with the replanting contractor to dispose construction waste during a month of August 2016 with commencement of replanting programmed. 2) To update the inventory and consignment according to EQA (2005) SW</p> <p>Corrective Actions 1) Will be disposed during month of August 2016. 2) To prepare a schedule on the disposal which include checklist for inventory update and consignment detail. 3) Training conducted to the schedule waste handler. The major NC was closed on 5/9/2016</p> <p>Assessment Conclusion ASA1_1 verification: Lambak/ Elaeis Estate has implemented the corrective action plan accordingly. Verified on site and confirmed: a. Demolished bungalow debris had removed from the location; b. Inventory and disposal record of schedule waste updated accordingly for all estate and POM. Objective evidence refer to findings 5.3.3. No recurrence of issues noted. The</p>	Major

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major NC is remained closed.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1359037M5	<p>Requirements RSPO SCCS D2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	Major
	<p>Evidence of Nonconformity The despatch volume of RSPO Certified CPO & PK recorded on the balance sheet records of Bukit Benut Mills (July 2015- June 2016) did not match with the volume announced in the etrace. For period July 2015- June 2016, the despatch recorded RSPO Certified 21467.83 MT CPO and 5133.69 MT PK while etrace only recorded 2000 MT CPO and 4078.12 MT PK.</p>	
	<p>Statement of Nonconformity The mill did not meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	
	<p>Corrections PSQM will discuss with the GTM pertaining this issue.</p>	
	<p>Corrective Actions The existing Supply Chain SOP will be amended accordingly to incorporate the necessary changes to fulfil the requirements of RSPO. The major NC was closed on 5/9/2016</p>	
	<p>Assessment Conclusion ASA1_1 verification: Verified transaction under license ID, CB45306 and physical delivery via spreadsheet for the delivery of palm product (CPO and PK). No recurrence of issue. The major NC is remained closed.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1359037N1	<p>Requirements Indicator 2.1.2 A documented system, which includes written information on legal requirements, shall be maintained.</p>	Minor
	<p>Evidence of Nonconformity Legal & Other Requirement Register (LORR) found to be not updated. Minimum Wage Order 2016 which takes effect 1st July 2016 was yet to be included Legal and Other Requirements Register (LORR).</p>	
	<p>Statement of Nonconformity Legal & Other Requirement Register (LORR) is not updated.</p>	
	<p>Corrections</p>	

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	<p>PSQM to amend the specific section mentioned in the LORR based on the current update. The updated section will then be circulated to Mill and Estates.</p> <p>Corrective Actions PSQM will update the LORR based on Group Compliance Office's latest legal list applicable to Estate and Mill. The changes of legal requirements will be notified to the operation unit.</p> <p>Assessment Conclusion ASA11 verification: The latest review done on 10 April 2017 and has incorporated Minimum Wages Order 2016 in the register. Same documents were verified at all visited operating units. Corrective action found to be effective. The minor NC was closed on 21/7/17.</p>	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1359037N2	<p>Requirements Indicator 4.6.10 Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).</p>	Minor
	<p>Evidence of Nonconformity Lambak Estate: Noted open burning activity at workers housing complex. Debris of dried leaves was burned in front of worker's house.</p>	
	<p>Statement of Nonconformity Disposal of Waste material was not effectively demonstrated.</p>	
	<p>Corrections Immediately communicate to the worker dependent on prohibition open burning as mention in 6.7 Fire Safety, SOP Workers Minimum Housing Standard Guideline.</p>	
	<p>Corrective Actions Planned to conduct awareness training to the all workers and dependent.</p>	
	<p>Assessment Conclusion ASA1_1 verification: Lambak/ Elaeis Estate has implemented the corrective action plan accordingly. Verified on site: a. Interviewed the workers and they aware the proper disposal of different type of waste; The domestic waste collected and send to dump site twice a week; schedule waste send to the licensed contractor. b. No burning signage erected at the line-site c. Inspection to the line-site and no evidence of burning</p>	
	<p>Thus, the minor non-conformance was closed on 21/07/2017.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1359037N3	<p>Requirements Indicator 4.7.6</p>	Minor

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	<p>All workers shall be provided with medical care, and covered by accident insurance.</p> <p>Evidence of Nonconformity CEP Niyor Estate: Implementation of Foreign Worker Compensation Scheme Certificate of Insurance Policy is ineffective.</p> <p>Statement of Nonconformity Renewed Foreign Worker Compensation Scheme Certificate of Insurance Policy was not available for verification.</p> <p>Corrections Requesting the insurance policy from the Workers Management Unit regarding on the policy for year 2016/2017.</p> <p>Corrective Actions Chief Clerk as a responsible person to ensure the policy available and update timely</p> <p>Assessment Conclusion</p> <p>ASA11 verification: Verified FWCS at all visited operating unit and still found valid. Bukit Benut POM Foreign workers policy covered for 13 workers. Sample of policies checked: i)FW190414 – period cover (4/8/16 – 4/8/17) ii)FW193445 – period cover (5/9/16 – 4/9/17) iii)FW193637 – period cover (7/9/16 – 6/9/17) iv)FW195350 – period cover (17/10/16 – 16/10/17)</p> <p>Bukit Benut Estate Total 110 foreign workers. Sample of workers checked i)FW201883 valid until 9/2/18 ii)FW201970 valid until 12/2/18 iii)FW201890 valid until 9/2/18 iv)FW201892 valid until 9/2/18 v)FW195087 valid until 10/10/17</p> <p>Lambak Estate Sample of FWCS checked: i)MW118777 valid until 21/12/17 ii)MW159431 valid until 20/5/18 iii)MW118779 valid until 2/12/17</p> <p>Corrective action found to be effective. Thus, the minor NC was closed on 21/7/17.</p>	
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Observation	
OBS #	Description
N.A	

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3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
04/2009	Minor	24/02/2009	Closed out on 27/9/2012
05/2009	Minor	24/02/2009	Closed out on 27/9/2012
06/2009	Minor	24/02/2009	Closed out on 27/9/2012
A787320/1	Major	25/9/12	Closed out on 23/11/2012
A787320/1	Minor	25/9/12	Closed out on 28/6/2013
A787320/2	Minor	25/9/12	Closed out on 28/6/2013
A787320/3	Minor	25/9/12	Upgraded to Major NC (938174M1)
A787320/4	Minor	25/9/12	Closed out on 28/6/2013
938174M0	Major	28/6/13	Closed out on 20/8/2013
938174M1	Major	28/6/13	Closed out on 20/8/2013
938174M2	Major	28/6/13	Closed out on 20/8/2013
938174N4	Minor	28/6/13	Closed out on 1/7/2014
938174N5	Minor	28/6/13	Closed out on 1/7/2014
938174N6	Minor	28/6/13	Closed out on 1/7/2014
938174M0	Major	28/6/13	Closed out on 20/8/2013
938174N7	Minor	28/6/13	Closed out on 1/7/2014
1071995M0	Major	4/7/14	Closed out on 11/7/2014
1223225M1	Major	13/8/15	Closed out on 22/8/2015
1223225N1	Minor	13/8/15	Reissued in 29/7/2016 as 1359037M4
1359037M1 – 2.1.1	Major	29/7/2016	Closed out on 5/9/2016
1359037M2 – 4.6.11	Major	29/7/2016	Closed out on 5/9/2016
1359037M3 – 6.5.2	Major	29/7/2016	Closed out on 29/9/2016
1359037M4 – 5.3.3	Major	29/7/2016	Closed out on 5/9/2016
1359037M5 – D2.2	Major	29/7/2016	Closed out on 5/9/2016
1359037N1 – 2.1.2	Minor	29/7/2016	Closed out on 21/07/2017
1359037N2 – 4.6.10	Minor	29/7/2016	Closed out on 21/07/2017
1359037N3 – 4.7.6	Minor	29/7/2016	Closed out on 21/07/2017
1503698-201707-N1 – 6.5.3	Minor	21/07/2017	"Open"
1503698-201707-N2 – 6.9.3	Minor	21/07/2017	"Open"
1503698-201707-N3 – 5.1.2	Minor	21/07/2017	"Open"
1503698-201707-N4 – 4.7.3	Minor	21/07/2017	"Open"
1503698-201707-N5 – 4.7.5	Minor	21/07/2017	"Open"

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Assessment Conclusion and Recommendation:

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

Acknowledgement of Assessment Findings	Report Prepared by
Name: Mr Nor Yazid Kanapi	Name: Mr Mohamed Hidhir Zainal Abidin
Company name: Sime Darby Plantation Sdn Bhd Bukit Benut Palm Oil Mill (SOU 22)	Company name: BSI Services Malaysia Sdn Bhd
Title: SOU22 Chairman, Bukit Benut Estate	Title: Lead Auditor
Signature:  Date: 28th December 2017	Signature:  Date: 26th December 2017

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Requests for information from the Regulatory Department such as DOSH, MPOB, DOE visiting log book were attended accordingly. Mill and estate assistant at each operating unit responsible on providing & updating the information to relevant stakeholder.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	The mill has implemented Record of Request Book to record any request and response from the stakeholders. Request for information are attended promptly and confirmed by stakeholders interviewed. External Communication Record is implemented in Lambak Estate for the stakeholders to request for any information and assistance from the management. For eg: Person in charge for Indian temple was requested the management to approve them to upgrade the temple on Lot No. 2001A. The manager has approved and replied to the request. For authority visit; DOSH inspection – 4/4/17, no major issues recorded. DOE visit – 2/3/17, flatbed monitoring to ensure no spills and overflow. Planning to comply with EQA 1974, Clean Air Regulation 2014.	Complied
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Sime Darby Plantations Sdn Bhd continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available through Sime Darby Plantations Sdn Bhd website and http://www.simedarbyplantation.com/Sustainability.aspx</p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> • Good Agricultural Practices • Social Enhancement • Sustainability Management Programmes • Complaint and Grievances procedure. • Environmental Conservation <p>These documents highlight current Sime Darby Plantations Sdn Bhd practices and their continual improvement plans. Besides the above document Sime Darby Plantations Sdn Bhd policy on the followings are also available at the same website:</p> <ol style="list-style-type: none"> 1) Social 2) Quality 3) Food Safety 4) Occupational Safety & Health 5) Environment & Biodiversity 6) Slope Protection and Buffer Zone 7) Lean Six Sigma 8) Gender <p>In addition to the website, the policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p>	<p>Complied</p>
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>		
<p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Sime Darby Plantation Sdn Bhd has established policy on code of ethical conduct and integrity (Code of Business Conduct- COBC) which covers all operations in the plantation operation. Briefing of policies were given to the mill workers on 15/6/2017, 15/2/2017 for Bukit Benut Estate and 17/7/2017 for contractors in Lambak Estate. Seen the evident of attendance list and photos.</p> <p>Furthermore, annual integrity audit by the Group Corporate Assurance Department (GCAD) was conducted with no serious issue related to integrity of all operations and transactions found.</p>	<p>Complied</p>
<p>Principle 2: Compliance with applicable laws and regulations</p>		
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>		

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Criterion / Indicator	Assessment Findings	Compliance
<p>2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>SOU22 had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and PSQM sustainability team. SOU22 had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were: <u>Bukit Benut POM</u></p> <ol style="list-style-type: none"> a. Environmental license no: 002208 valid from 1 Jul 2016 to 30 Jun 2017 b. License for abstracting river water; no: 08/A/Klg/014 valid till 31 December 2017 c. Air Compressor Receiver; JH PMT 2917 valid till 06 June 2017 d. Steam Receiver; PMT 43561 e. MPOB License; no: 528154004000 valid till 31 Mar 2018 f. Competent Person for CePPOME/16040 g. Competent Person for CePSWaM/16284 h. Authorized Gas Tester and Entry Supervisor for Confined Space; No: NW-HQ-AGT-09990-O valid till 26 June 2018 i. Charge-man license; Authorized no: PJ-T-4-0006-2006 <p><u>Bukit Benut Estate</u></p> <ol style="list-style-type: none"> 1. Permit for deduction of utilities fee; No: PP3/29/377/2006 2. MPOB License: 522307002000 valid till 31 July 2018 3. Diesel & Petrol Permit # J030513 valid till 23 Jul 2018 4. Air Receiver- PMT- JH 136454 valid till 25 Jan 2018 <p><u>Lambak Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License: 518641002000 valid till 28 Feb 2018 2. Diesel & Petrol Permit # J029739 valid till 12 Apr 2018 3. Air Compressor Receiver- PMT- JH/17 08597 valid till 17 July 2018; PMT- JH/17/08596 valid till 17 JULY 2018 	<p>Complied</p>
<p>2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -</p>	<p>SOU22 had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment.</p> <p>Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>In Bukit Benut estate, the LORR has been prepared, checked, and approved for compliance as dated. The latest review done on 10 April 2017. Similar document sighted in Lambak Elaeis estate.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -	Evaluation of the legal requirements and compliance status with legal requirement are monitored by the operating units through the internal audit BY. Following the internal date: Bukit Benut POM- 07 June 2017 Bukit Benut Estate- 6 June 2017 Lambak Elaeis Estate- 6 June 2017	Complied
2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system to identify changes in the relevant regulations is available through the head office, website information and is communicated from the Group Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operation. Tracking system on any changes in the law had been well implemented.	Complied
Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.		
2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	Documents showing legal ownership or lease, history of land tenure and the actual legal use (agriculture) of the land were made available at all visited sites. Sample of land title based on the latest quit rent for 2017 are: <u>Bukit Benut Estate</u> i) Grant#98998, Lot #873, area: 195.969 ha, District: Mukim Renggam ii) Grant#120735, Lot #1088, area: 351.8736 ha, District: Mukim Renggam <u>Lambak Estate</u> i) Grant#134839, Lot #2983, area: 505.8563 ha, District: Mukim Kluang ii) Grant#94497, Lot #1532, area: 621.1924 ha, District: Mukim Kluang	Complied
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	During the field visit it was noted that legal boundaries are clearly demarcated and visibly maintained near to Bukit Benut Estate. Field P08B is adjacent to smallholder farm and the boundary stone #J99506 can be located. In addition, boundary marker is also clearly demarcated and visibly maintained. <u>Lambak Estate</u> Boundary marker is clearly demarcated and visibility maintained near to the boundary along P2007D which adjacent to smallholder's rubber and vegetable farm.	Complied
2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the SOU 22 Bukit Benut at the time of audit. The land belongs to Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied

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2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	Complied
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.		
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	Complied

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2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	There is no land dispute in the SOU 22 Bukit Benut at the time of audit. The land belongs to Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There is no land dispute in the SOU 22 Bukit Benut at the time of audit. The land belongs to Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no land dispute in the SOU 22 Bukit Benut at the time of audit. The land belongs to Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
Principle 3: Commitment to long-term economic and financial viability		
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.		
3.1.1 A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER, and KER, OPEX, CAPEX etc. Bukit Benut Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year. CAPEX allocation for mill and estate was made available for review for FY 17/18: Mill: ESP system for new Clean Air Regulations 2014 compliance Estate: new tractor, workers and executive housing and workshop garage	Complied

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3.1.2	<p>An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -</p>	<p>SOU22 estates has documented a long range replanting program until 24/25. Replanting is planned for tall palm and older than 25 years old. Replanting programme for the next financial year as follow:</p> <p><u>Bukit Benut Estate</u> FY 17/18 : plan (86.56 ha) FY 18/19 : plan (103.98 ha)</p> <p><u>Lambak Estate</u> Long range replanting programme until 36/37. FY17/18 : 168.55 ha (1995A & 1995C) FY18/19 : 169.38 ha (1994B & 1995B)</p>	Complied
<p>Principle 4: Use of appropriate best practices by growers and millers</p>			
<p>Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
4.1.1	<p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs: Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. SOP for the Composting Plant dated 15/8/2011: Composting Management System version 1:2011 Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc. Noted updated procedure under SOP for water analysis and RSPO SCCS procedure:</p> <p>i)SPMS, Appendix 7: SOP for water quality monitoring, issue:2 dated 1/6/16.</p> <p>SOP for sampling guideline</p> <p>ii)Water and Wastewater Sampling Guideline, issue:1 dated 1/6/16.</p> <p>iii) RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version:2, issue: 2 dated October 2016</p>	Complied
4.1.2	<p>A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p>	<p>External Mill Advisor and a Planting Advisor inspect and report on the operations on annual basis. There were other audits by PSQM and GCAD to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	Mill Advisor’s latest visit was on 29-30/9/16. (report No.: SOU22/BBM/01/16-17). Report includes monitoring of all activities in the mill covering the OER & KER performance, process losses, mill throughput (maintenance, downtime), product quality and compliance monitoring. <u>Bukit Benut Estate</u> Agronomist report, FY2017/2018 was carried out on 20-21 June 2017. Monitoring of (rainfall, yield [performing and under-performing], palm nutrition status, fertilizer recommendation has been included in the report. Other matters such as field observation and agronomic matters was also incorporated in the report i.e bagworm infestation etc. <u>Lambak Estate</u> The latest agronomist report was last done on 28-29/1/17. Refer to report dated 6/6/17.	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	No 3rd party crop received at Bukit Benut POM. Occasionally there are certified FFB received by the mill from Sime Darby Group estates. This is verified through RSPO certificate validity by the management through the weighbridge receiving system.	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.2 Records of fertiliser inputs shall be maintained. - Minor compliance -</p>	<p><u>Bukit Benut Estate</u> Fertilizer application programme is based on the recommendation by agronomist under Appendix Ia, 2017 Agronomist and Fertilizer Recommendations Report. Date of visit: 25-26/5/16. Programme for mature and immature fields available for review. Sample of programme for RP (28% P2O5) P06B (44.45 ha) Application date: 19-20 May 2017, recommendation rate: 2.0 kg/palm for total of 11.36 mt For FY2017/2018, manuring programme will start in August 2017 for mature area (AS 21%N programme) and immature (CCM45[12:12:17:2] programme) in July 2017. Refer to 2017/2018 Agronomic & Fertiliser Recommendation Report – Oil Palm, Appendix I dated 20-21/6/17.</p> <p><u>Lambak Estate</u> Fertilizer application follows the Agronomist recommendation from the R&D department. Recommendation for FY2017/2018. Refer to FY2017/2018 fertilizer recommendation report. Sample (central), field 15A @ ex 1992B: Immature: CPD 45 (CCM45[12:12:17:2] programme) for total of 77.54 Ha</p>	<p>Complied</p>
<p>4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -</p>	<p>Sime Darby Seeds and Agriculture Services Sdn Bhd prepare the annual fertilizer recommendation. Leaf analysis result which shows the nutrient level was used as guidance for the fertilizer recommendation. At Bukit Benut Estate, leaf sampling was carried out in December 2017. Foliar nutrient status reported under the latest agronomist report for FY2017/2018 dated 14/7/17. Soil analysis carried out at 5 years interval. The last soil analysis was carried out on 16/2/15, Report# S20/2015 dated 16/3/15.</p> <p><u>Lambak Estate</u> The latest leaf sampling analysis was carried out in February 2017 for central (main) and Elaeis. Leaf foliar analysis report incorporated under agronomist report for Lambak Estate 2017/2018 Agronomic & Fertilizer Recommendation Report dated 6 June 2017. Soil sampling is valid for 5 years refer to analysis report dated 24/4/15, report ref#S37/2015</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
4.2.4 A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. EFB applied at selected fields at the estates. Recommended rate is 40mt/ha. <u>Bukit Benut Estate</u> POME is applied at only selected field namely 1997A, 1997B and 2002A. Total hectare covered is 100.44 Ha for FY16/17. <u>Lambak Estate</u> Planned for 2 rounds per year of EFB application. For the period from March –June 2017, total of 10,072.4 tonne applied at field 1996A, 2008A, 2008B and 2008C.	Complied
Criterion 4.3: Practices minimise and control erosion and degradation of soils.		
4.3.1 Maps of any fragile soils shall be available. - Major compliance -	Soil series map available. Soil series summary as follow: <u>Bukit Benut Estate</u> Majority: Rengam: 1682.64 (%), renggam/bkt lunchu: 717.58 ha (%), Jerangau: 242.18 ha (%) and Bukit lunchu: 64.29 ha (%) <u>Lambak Estate</u> Majority: Rengam (58.67%), local alluvium I (16.37%), rengam shallow (12.01%) etc. There are no peat soils or soil categorised as problematic or fragile soil at all estates.	Complied
4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Most of the area in SOU 22 area are undulating and low lying area. The directive for planting terraces in accordance with SDPSB policy where slope >10° need to establish with cover crops such as mucuna and soft grasses and ferns. <u>Bukit Benut Estate</u> Terrain classification: Flat (0-2°) – 33.85%, undulating (2-6°) – 56.62%, rolling (6-12°) – 9.38%, (12-20°) – 0.5%.	Complied
4.3.3 A road maintenance programme shall be in place. - Minor compliance -	Estates visited have implemented annual Road Maintenance Programme FY2016/2017. Plan for the next financial year (FY 2017/2018) available for grading and compacting, resurfacing and road side pruning.	Complied
4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at all estates visited. Thus, this indicator is not applicable	Not applicable
4.3.5 Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at all estates visited. Thus, this indicator is not applicable	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance												
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at all estates visited. Thus, this indicator is not applicable	Not applicable												
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.															
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	<p><u>Bukit Benut POM</u> Sighted an implemented water management plan was established as Bukit Benut Palm Oil Mill for Financial Year 2017/2018 review on 04 July 2017. The plan has incorporated into three categories and its issues:</p> <ol style="list-style-type: none"> Water catchment SAJ- Water supply Monitoring of nearby streams <p><u>Bukit Benut Estate</u> Sighted an implemented plan established as Water Management Plan FY 2016/2017 – SOU (22) dated 8 Aug 2017. The plan incorporates issue/area such as rainwater harvesting, water reduction awareness briefing, avoid leakage on piping and etc.</p> <p><u>Lambak/ Elaeis Estate:</u> Water Management Plan FY2016/2017 for contingency plan during water shortage is available. Action steps such as purchase water supply from Syarikat Air Johor as well as provide training to the staff. The plan updated on 1 Aug 2016.</p>	Complied												
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	<p>Documented as a Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). Buffer zones established as following:</p> <table border="1"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 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>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>In Bukit Benut Estate, visited to block P10B has verified the buffer zone of River Melantai are well maintained with the signage and demarcation. Similar positive observation also to the pond at block P09C at Lambak/Elaeis Estate.</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	Complied
River width	Buffer zone														
> 40 meters	50 meters														
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Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.3</p> <p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -</p>	<p>Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD allowed by DOE was 3500mg/l through land application only.</p> <p>Regular monitoring was conducted by the mill by taking the sample of waste water in final discharge point on monthly basis and water at the final discharge, upstream and downstream of Mengkibol River.</p> <p>Monthly effluent monitoring records parameter monitored:- pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G by Sime Darby Research Sdn Bhd:</p> <ul style="list-style-type: none"> a. Date: 19 May 2017; Ref no: IE567/2017 b. Date: 15 Feb 2017; Ref no: IE235/2017 c. Date: 12 Jan 2017; Ref no: IE85/2017 <p>BOD limit for final discharge <3500 mg/L were met as well as all parameters that were within allowable limit.</p>	<p>Complied</p>
<p>4.4.4</p> <p>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -</p>	<p>Water consumption per MT FFB recorded from July 2016 to Jun 2017. The water consumption as below:</p> <ul style="list-style-type: none"> a. April 17- 1.67 m³ per MT FFB. b. May 17- 1.40 m³ per MT FFB. c. June- 1.39 m³ per MT FFB. 	<p>Complied</p>
<p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>		

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.1</p> <p>Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -</p>	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estates are continue to plant beneficial plants such as Turnera subulata. Latest updates of Bukit Benut Estate IPM's as per below:</p> <p>Beneficial plant: 6:2:2 (target for minimum 1 dm/ha)</p> <p>Rat baiting: calendar baiting (6 rounds below 20% - completed for field 2008A), warfarin (1st generation) dated 16/2/17. If not effective, 2nd generation of rat baiting will be used for 2nd campaign.</p> <p>Barn owl box: Occupancy rate average at 80.47% (1st round in October 2016) together with BOB maintenance and replacement/new box.</p> <p><u>Lambak Estate</u></p> <p>Beneficial plant: 6:2:2 (planted 1.5 dm/ha)</p> <p>Rat baiting: calendar baiting (2 rounds of baiting) completed for field 2005A1 – 19.82% below threshold level) using warfarin (1st generation)</p> <p>Barn owl box census: 2 round per year. February census: Occupancy rate – 76.64% BOB maintenance and replacement/new box</p>	<p>Complied</p>
<p>4.5.2</p> <p>Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -</p>	<p>IPM training is given by the Agronomist and plantation executives with qualification in agriculture. Interview with the barn owl occupancy census team confirm their understanding of the Sime Darby SOP in Agricultural Reference Manual v.1 Section 15 on census. The latest IPM training (IPM and trunk injection) was carried on 6/7/17 at Lambak Estate. Centralized training for SOU22 named "Hoot Hoot The Rats Programme" was carried out on 19/4/17. This training focus mainly on IPM (BOB implementation) and rat baiting programme for the estates</p>	<p>Complied</p>
<p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p>		

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Criterion / Indicator	Assessment Findings	Compliance																												
<p>4.6.1</p> <p>Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available.</p> <p>- Major compliance -</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease. Some of recommended pesticides are:</p> <p>Immature planting (sample)</p> <ul style="list-style-type: none"> - General weeds : Glyphosate - Legume & broad leave : Metsulfuron Methyl - Stenochlaena palustris : Sodium chlorate <p>Mature planting</p> <ul style="list-style-type: none"> - VOPs : glyphosate & sodium chlorate <p>The selection is also evaluated by the agronomist during his visit to the estate.</p>	<p>Complied</p>																												
<p>4.6.2</p> <p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided.</p> <p>- Major compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. For FY2016/2017, total 0.148 Ai/Ha recorded for Lambak Estate. (Metsulforon methyl, cypermethrin, acephate, warfarin, glufossinate ammonium, thiram, trichlorofan). Summary of Ai/Ha from July 2016 – June 17 as per below:</p> <table border="1" data-bbox="657 1205 1295 1839"> <thead> <tr> <th>Month</th> <th>Ai/Ha</th> </tr> </thead> <tbody> <tr><td>July 2016</td><td>0.091</td></tr> <tr><td>August 2016</td><td>0.079</td></tr> <tr><td>September 2016</td><td>0.127</td></tr> <tr><td>October 2016</td><td>0.074</td></tr> <tr><td>November 2016</td><td>0.149</td></tr> <tr><td>December 2016</td><td>0.117</td></tr> <tr><td>January 2017</td><td>0.105</td></tr> <tr><td>February 2017</td><td>0.104</td></tr> <tr><td>March 2017</td><td>0.179</td></tr> <tr><td>April 2017</td><td>0.267</td></tr> <tr><td>May 2017</td><td>0.111</td></tr> <tr><td>June 2017</td><td>0.372</td></tr> <tr><td>Average</td><td>0.148</td></tr> </tbody> </table>	Month	Ai/Ha	July 2016	0.091	August 2016	0.079	September 2016	0.127	October 2016	0.074	November 2016	0.149	December 2016	0.117	January 2017	0.105	February 2017	0.104	March 2017	0.179	April 2017	0.267	May 2017	0.111	June 2017	0.372	Average	0.148	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III & IV chemical used at visited estates. Alternative for class IA chemical, Methamidophos was used named Acephate under class III for bagworm infestation. Refer to permit to buy Acephate, JHR/2017/ACP/52(GL) dated 20/6/17 for to tal of 277.5 kg. <u>Lambak Estate</u> Permit to buy Acephate available. Refer to permit, JHR/2017/ACP/58(GL) dated 16/7/17 for total 800kg
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipments and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5. For weeding activities, knapsack spray pump and low volume CDA spray are used for selective and circle spraying.
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spray at SOU22

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Criterion / Indicator	Assessment Findings	Compliance	
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders at SOU22. Employees demonstrate knowledge and skills on pesticide handling. MSDS/SDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers.	Complied
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Disposal method of all identified waste was already included in the pollution prevention plan where the site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented throughout the company within mill and estates. In Lambak/ Elaeis estate, visited to the line site and interviewed the workers as they understood the waste handling. The waste being collected twice a year and send to the landfill.	Complied
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<u>Bukit Benut Estate</u> Medical surveillance was carried out by OHD, HQ/08/DOC/00/597 under Klinik Renggam on 5/7/17 for total of 40 workers from different work units based on CHRA recommendation. Group of sprayers, trunk injector, sprayer, store keeper and foreman was sent for medical surveillance. Results found that there were no detrimental of health and fit to work. <u>Lambak Estate</u> Medical surveillance for 2016 was carried out on 22-25/8/16 for total of 41 workers for different type of work units (workshop, spraying, trunk injector and water pump operator). Verified the medical report by registered OHS, HQ/08/DOC/597 under Klinik Renggam and found all workers are fit to work without any occupational related disease.	Complied
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	Noted there were a few women working as chemical mixers and sprayers. Verified that the worker were over the reproductive age.	Complied
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			

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<p>4.7.1</p> <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>SOU22 has maintained an approved Health and Safety Policy dated January 2015 that is displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site safety officers and monitored by OSH Manager from Head Office. Sample of Bukit Benut Palm Oil Mill ESH programme for FY2016/2017:</p> <p>i) Medical surveillance – Klinik Renggam, 26/4/17 (HQ/08/DOC/00/597 for total of 25 workers from workshop and laboratory. 1st batch of report was completed for 12 workers. All workers are found fit to work with no detrimental of occupational related disease. Verified Operational Control Procedure, SD/SDP/PSQM(ESH)202-OH8, rev:0 dated 26/2/15 for the medical surveillance and related medical removal protection procedure.</p> <p>ii) Audiometric testing – For 2017, annual audiometric is planned by end July 2017. Verified PO issued to Procoma Environmental (M) Sdn Bhd, refer doc# 4300376535 dated 2/6/17.</p> <p>iii) LEV testing and inspection – the last inspection was carried out on 14/3/17 by Eurofins NM Laboratory Sdn Bhd. DOSH registered IHT II, JKKP HIE 127/171-3/2(178). Face velocity (hood) and travel velocity (ducting) below recommended value of ACGIH. Monthly inspection done by internal technician. Refer to inspection checklist for the month of June 2017.</p>	<p>Complied</p>

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<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p>SOU 22 had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. Refer to revisited CHRA report for Bukit Benut POM, (JKKP HIE 127/171-(2)317 dated February 2014.</p> <p>For Bukit Benut Estate, CHRA report dated 13 October 2015 by JKKP HIE 127/171-2(363) has include the new chemical used for trunk injection, namely Acephate under class III category.</p> <p>Revised HIRARC checked at the visited operating units as per the following:</p> <p><u>Lambak Estate</u></p> <p>HIRARC revised after accident occurrence (falling debris entering eye) while pruning on 26/3/17. Revision date 7/4/17.</p> <p><u>Bukit Benut Estate</u></p> <p>Revised after accident occurrence, MB driver accident (FFB fell to his right arm – 10/4/17). Date of revision 1/6/17.</p> <p><u>Bukit Benut POM</u></p> <p>Revised HIRARC after accident 5/2/17 dated 20/2/17 checked. Rating and current control measure has been updated in the register.</p>	<p>Complied</p>
<p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -</p>	<p>Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Suitable PPE has been provided to the workers based on the information in the MSDS/CSDS and CHRA assessor’s recommendation.</p> <p>List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p> <ul style="list-style-type: none"> i) Sterilizer and boiler/power operator – Safety Helmet, Semi leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff ii) Lab operator – Respirator (double cartridge) Nitrile Glove (chemical resistant), safety boots, Ear plug (NRR = 24 dB) iii) Field workers (sprayer, manurer & harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover. <p><u>Bukit Benut Estate</u></p> <p>Observed at block 97B, CDA sprayer gang was not provided with eye protection @ goggles as per Sime Darby’s Pictorial Safety Standard. Thus, Minor NC was issued.</p>	<p>Minor nonconformance</p>

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<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>Assistant manager and QA at each of the operating units are appointed as OSH Coordinators and Estate Hospital Assistant as Safety and Health Committee Secretary. OSH Committees meeting conducted quarterly and meeting minutes includes issues raised and action taken form workplace inspection report etc. The latest meeting was conducted on the 30/6/17 at Bukit Benut Palm Oil Mill. All members has attended the meeting with discussion on the accident review, safety improvement plan, issues from workers has been discussed and action to be taken. There was no major issue.</p> <p><u>Bukit Benut POM</u></p> <p>Record of meeting 8/12/16, 28/9/16, 23/6/16, 31/3/16.</p> <p>Verified appointment letter as SHC Chairman dated 2/1/17 signed by CEO Southern Region which valid for 24 months.</p> <p><u>Bukit Benut Estate</u></p> <p>SHC meeting – 10/6/17, 10/3/17, 24/12/16, 30/9/16</p> <p><u>Lambak Estate</u></p> <p>PIC for OSH – HA and Estate assistant</p> <p>SHC meeting – 9/5/17, 13/2/17, 15/11/16, 18/5/16</p>	<p>Complied</p>

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<p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p>	<p>Emergency Response Plan (ERP) has been established and defined in procedure, Level 2, Standard Operation Manual, Sub Section 5.5, Management Responsibility, Appendix 5.5.3.3 Emergency Preparedness and Response Procedure, version:1, issue :1 dated 1/11/2008. Emergency response activities were also included in the ESH plan FY 16/17. The following Emergency Response Plan were addressed: Fire Outbreak, Accident and incident occurrence, Oil Spillage and etc. Latest fire evacuation drill was done on 29/5/17 at Bukit Benut Oil Mill.</p> <p>Records on all accidents kept and summary sent to Head Office. Quarterly review on accident cases carried out during OSH quarterly meeting. Noted 1 (one) class III (temporary disability) accident dated 15/2/17 occurred at Bukit Benut POM involving workshop fitter. Verified internal investigation report for the accident. Root cause, correction and corrective action have been determined as to prevent recurrence of accident.</p> <p>There were 4 cases of hearing impairment recorded in 2016. Verified JKKP 7 dated 24/10/16 for the said workers and summarized under JKKP 8 for annual reporting to DOSH. Online report submission acceptance by DOSH on 30/1/17. Refer to ref# JKKP8/3791/2016.</p> <p>Emergency preparedness was not effectively implemented where the following issues was found during site visit:</p> <p>i)Expired item (antiseptic solution @ Dettol) with date of expiry 15/1/17 was found in the first aid box at mill's workshop.</p> <p>ii)Based on the inspection records, only 8 out of 10 first aid boxes were inspected and replenished since December 2016 which has not included the first aid box located at mill's workshop</p> <p>Thus, a minor NC was issued.</p>	<p>Minor nonconformance</p>

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<p>4.7.6 All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p>	<p>Medical care is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme. Sample of insurance policies and social security (SOCSO) checked:</p> <p><u>Bukit Benut POM</u></p> <p>Foreign workers policy covered for 13 workers. Sample of policies checked:</p> <p>i)FW190414 – period cover (4/8/16 – 4/8/17) ii)FW193445 – period cover (5/9/16 – 4/9/17) iii)FW193637 – period cover (7/9/16 – 6/9/17) iv)FW195350 – period cover (17/10/16 – 16/10/17)</p> <p>Checked social security payment, “Jadual Caruman” @ 8A form for June 2017 involving 78 workers.</p> <p><u>Bukit Benut Estate</u></p> <p>Total 110 foreign workers. Sample of workers checked</p> <p>i)FW201883 valid until 9/2/18 ii)FW201970 valid until 12/2/18 iii)FW201890 valid until 9/2/18 iv)FW201892 valid until 9/2/18 v)FW195087 valid until 10/10/17</p> <p>Checked social security payment, “Jadual Caruman” @ 8A form for June 2017 involving 85 workers.</p>	<p>Complied</p>												
<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -</p>	<p>Records on Lost Time Accident (LTA) metrics displayed at the operating units through Safety Statistic Billboard and reported to PSQM-ESH department using new online system called SMS-IT. Sample of accident statistic as shown below:</p> <table border="1" data-bbox="660 1503 1297 1805"> <thead> <tr> <th>Year</th> <th>Bukit Benut POM</th> <th>Bukit Benut Estate</th> <th>Lambak Estate</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>0 case (0 LTA)</td> <td>3 cases (7 LTA)</td> <td>5 cases (6 LTA)</td> </tr> <tr> <td>2017 to date</td> <td>3 case (4 + prolong MC) 185 days + 4 days</td> <td>2 cases, (9 LTA)</td> <td>1 case 5 LTA</td> </tr> </tbody> </table> <p>*Summary of LTA is based on GSQM ESH Portal as at June 2017</p>	Year	Bukit Benut POM	Bukit Benut Estate	Lambak Estate	2016	0 case (0 LTA)	3 cases (7 LTA)	5 cases (6 LTA)	2017 to date	3 case (4 + prolong MC) 185 days + 4 days	2 cases, (9 LTA)	1 case 5 LTA	<p>Complied</p>
Year	Bukit Benut POM	Bukit Benut Estate	Lambak Estate											
2016	0 case (0 LTA)	3 cases (7 LTA)	5 cases (6 LTA)											
2017 to date	3 case (4 + prolong MC) 185 days + 4 days	2 cases, (9 LTA)	1 case 5 LTA											
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>														

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.8.1</p> <p>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.</p> <p>- Major compliance -</p>	<p>SOU22 has established an annual training program FY 2017/2018 that covers all aspects including OSH, environmental, machinery, emergency, 5s housekeeping as well as RSPO Principles and Criteria.</p> <p>Bukit Benut Palm Oil Mill ESH Management Plan FY2017/2018. Implementation is still on-going. There is total 26 training needs/requirements – Training Plan FY2017/2018 identified for various categories of operating units.</p> <p>Training Plan FY2016/2017 identified for various categories of operating units for the estate. There is total 29 training requirements in Bukit Benut Estate which cover safety, environment and emergency aspect. Similar training plan FY16/17 sighted at Lambak/ Elaeis Estate.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance																																
<p>4.8.2 Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement. Samples of training record as follows:</p> <p><u>Bukit Benut POM</u></p> <table border="1" data-bbox="660 566 1177 752"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>29/05/2017</td> <td>Fire/ Emergency Drill</td> </tr> <tr> <td>24/01/2017</td> <td>First Aid Training</td> </tr> <tr> <td>06/01/2017</td> <td>Safety Town Hall 4.0</td> </tr> </tbody> </table> <p><u>Bukit Benut Estate</u></p> <table border="1" data-bbox="660 842 1177 1149"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>24/01/2017</td> <td>First Aid Training</td> </tr> <tr> <td>06/05/2017</td> <td>IPM Training</td> </tr> <tr> <td>22/05/2017</td> <td>Cutter SAFETY and SOP</td> </tr> <tr> <td>10/03/2017</td> <td>Safe Operating Procedure of Mechanical Buffalos</td> </tr> <tr> <td>03/04/2017</td> <td>Long Stalk Safety and SOP</td> </tr> </tbody> </table> <p><u>Lambak/ Elaeis Estate</u></p> <table border="1" data-bbox="660 1238 1177 1592"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>10/04/2017</td> <td>Manuring safety and application refresher training</td> </tr> <tr> <td>06/07/2017</td> <td>IPM and trunk injection</td> </tr> <tr> <td>22/05/2017</td> <td>Spraying safety refresher training</td> </tr> <tr> <td>29/04/2017</td> <td>Nursery safety and application training</td> </tr> <tr> <td>17/07/2017</td> <td>COBC Training with contractor</td> </tr> </tbody> </table>	Date	Training	29/05/2017	Fire/ Emergency Drill	24/01/2017	First Aid Training	06/01/2017	Safety Town Hall 4.0	Date	Training	24/01/2017	First Aid Training	06/05/2017	IPM Training	22/05/2017	Cutter SAFETY and SOP	10/03/2017	Safe Operating Procedure of Mechanical Buffalos	03/04/2017	Long Stalk Safety and SOP	Date	Training	10/04/2017	Manuring safety and application refresher training	06/07/2017	IPM and trunk injection	22/05/2017	Spraying safety refresher training	29/04/2017	Nursery safety and application training	17/07/2017	COBC Training with contractor	<p>Complied</p>
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Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

Criterion 5.1:

Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.

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<p>5.1.1</p> <p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p>POM and Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts. The last review was conducted in 07 July 2017 at POM.</p> <p>In POM, the environmental aspect and impacts was reviewed on 24 May 2017. It cover the various area/field such as landfill, replanting, workshop, nursery, clinic and etc. Similar aspect and impact identification available in Bukit Benut and Lambak/ Elaeis estate.</p>	<p>Complied</p>
<p>5.1.2</p> <p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -</p>	<p>The mill and estates has continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and assistant managers of mill and estates were identified as person-in-charge of the programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were done annually if there's no any new activity within respective sites.</p> <p>Environmental Aspect Identification (EAI) and Environmental Evaluation (EIE) reviewed and updated. Neither any change to current operation nor new activity identified by the mill other than normal mill operation including weighbridge operation, process, maintenance, water and waste water treatment.</p> <p>In POM, Environment Management Programme for Financial Year 2017/2018. For example, to prevent overflow of POME and prevent non-compliance with DOE requirements</p> <p>In Bukit Benut and Lambak/ Elaeis estate, environment management plan is not comprehensive as not reflecting the significant risk according to the evaluation of environmental aspect and impact FY2016/2017. Thus, minor NC was issued.</p>	<p>Minor nonconformance</p>

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<p>5.1.3</p> <p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p>An Environmental Pollution Prevention Plan 2016/2017 made available for POM and estate. Listed environmental issue/Improvement plan/Location /PIC time bound.</p> <p>This environmental improvement 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 (July 2016 - July 2017) to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Sample of monitoring as following:</p> <p>a. Water analysis report (no: IE190/2017) dated 14 Feb 2017 for the river in Bukit Benut Estate sighted during site visit.</p> <p>b. Monthly effluent monitoring records parameter monitored:- pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G by Sime Darby Research Sdn Bhd:</p> <p>i. Date: 19 May 2017; Ref no: IE567/2017</p> <p>ii. Date: 15 Feb 2017; Ref no: IE235/2017</p> <p>iii. Date: 12 Jan 2017; Ref no: IE85/2017</p> <p>BOD limit for final discharge <3500 mg/L were met as well as all parameters that were within allowable limit.</p> <p>c. In Lambak estate, record of schedule waste inventory and disposal record made available during onsite visit. Disposal record example:</p> <p>i. Consignment note no: 01237279 dated 11 May 2017; SW 404</p> <p>ii. Consignment note no: 14392 dated 26 Mar 2017; SW409</p>	<p>Complied</p>
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>		
<p>5.2.1</p> <p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>	<p>HCV Re-Assessment for Strategic Operating Unit (SOU) 22 Bukit Benut has been conducted on December 2015 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd; Interim Report (Version II).</p> <p>Total HCV area identified for SOU 22 falls under HCV category 4: Pond/River Reserve/ Water Catchment area. The total area is 32.94 Ha distributed among Lambak Elaeis, CEP Nyior, and Bukit Benut estate.</p>	<p>Complied</p>

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5.2.2	<p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p> <p>In SOU22, identified HCVs- water catchment only. Their management plan such as:</p> <ul style="list-style-type: none"> • Ensure signage is maintain at site and retrievable • To update the monitoring record of terracing • To promote awareness on HCV • To identify how task relating to HCV/biodiversity are to be performed <p>Similar HCV management plan FY2016/2017 at Bukit Benut and Lambak/ Elaies estate, the management plan reviewed on 1st July 2016.</p>	Complied
5.2.3	<p>There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance -</p> <p>Signage as well as routine patrolling activities were utilised as part of creating awareness among employees and maintain at biodiversity areas.</p> <p>In Bukit Benut, the HCV training conducted to all the workers on 15 December 2017. Similar training conducted on 28 December 2016 for Lambak/ Elaies estate.</p>	Complied
5.2.4	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. <p>- Minor compliance -</p> <p>In Bukit Benut, the management plan include monitoring of buffer zone area and conservation area in the estate and surrounding area. The patrolling cover all the four identified HCV areas and the latest record dated 31 May 2017.</p> <p>In Lambak/ Elaies estate, the HCV management plan FY2016/2017. The plan focusing on the identification and conservation of the remnant forest patches and area more than 25 degree slope</p>	Complied
5.2.5	<p>Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights.</p> <p>- Minor compliance -</p> <p>There was no HCV set-aside that needs any negotiation process with the local communities.</p>	Complied
<p>Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>		

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<p>5.3.1</p> <p>All waste products and sources of pollution shall be identified and documented. - Major compliance -</p>	<p>As per Sustainable Plantation Management System Appendix 9 Procedure for Handling of Domestic Waste version 1, year 2008, issue no. 1, dated 1 October 2008.</p> <p>Mill: 3 types of waste –</p> <p>a. Scheduled waste, domestic waste and recyclable waste. These categories include: effluent, fibre/shell, EFB, boiler clinker, wash water, scrap metal, scheduled waste, boiler blowdown, hydro-cyclone wash water, methane gas.</p> <p>Estate: type of waste</p> <p>a. Scheduled waste – SW102, SW305, SW306, SW409, SW410, SW404 – workshop, clinic, SW store, store;</p> <p>b. Domestic waste – rubbish & sewage – line-site, office, workshop, store, shop &</p> <p>c. Recycle waste – empty container, waste oil</p> <p>d. Industrial waste – Scrap iron</p> <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 maintained accordingly.</p>	<p>Complied</p>
<p>5.3.2</p> <p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p>	<p>The disposal of used chemicals and containers were done in accordance with their schedule on waste management as planned. Stores for scheduled waste were inspected at audited sites i.e. Mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p> <p>In POM, schedule waste dispose through licensed contractor: Kualiti Alam Sdn Bhd. Latest consignment note dated Consignment note for schedule waste dated 11 March 2017 for SW 324 and SW 410 sighted during onsite visit.</p> <p>In Bukit Benut estate, schedule waste such as empty containers and used lubricants were sold to licensed contractor. For example, the sales of tripled rinsed empty containers to SS Setia Teknologi Enterprise (authorized under JPK No. 3.45/06) documented in tax invoice (no: 6500008379) dated 25 Feb 2017.</p> <p>In Lambak estate, record of schedule waste inventory and disposal record made available during onsite visit. Disposal record example:</p> <p>a. Consignment note no: 01237279 dated 11 May 2017; SW 404</p> <p>b. Consignment note no: 14392 dated 26 Mar 2017; SW409</p>	<p>Complied</p>

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<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>Scheduled waste is managed well with designated storage area at the mill and each of the estates in accordance with the requirements of the Environmental Quality Act 1974 (Scheduled Wastes), Regulations, 2005. Disposal was through licensed collector.</p> <p>The company has continued managing scheduled waste stores at the mill and each of the estates. Agrochemical containers are triple rinsed and punctured to avoid any misuse.</p> <p>For domestic waste, estate will send to their dumpsite establish within their estate which at least 3km away from water course and residential area.</p> <p>Waste Management Action Plan FY 2016/2017 Bukit Benut Mill dated 01/07/2016 including scheduled waste, domestic waste and industrial waste sighted during the visit for the mill.</p> <p>In estate, only domestic waste observed when visiting to the dumpsite established at block P00 (Bukit Benut Estate) and P95A-2 (Lambak estate). For clinical waste in Bukit Benut estate, the latest consignment note no: 0083151 dated 3 Feb 2017 sighted during site visit.</p>	<p>Complied</p>
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		

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<p>5.4.1</p> <p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of grid supply (TNB) for electricity, palm fibre 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 coiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis respectively.</p> <p>Monthly records of energy consumption of non-renewable and renewable fuel per metric tonne of palm product (fibre & shell) at the Mill were available. For example, renewable energy usage (mt)/ FFB (mt) as below:</p> <ul style="list-style-type: none"> a. Apr 2017: 4.76 b. May 2017: 5.24 c. Jun 2017: 5.04 <p>For diesel consumption showing total average</p> <ul style="list-style-type: none"> a. April 2017: 0.2 litre/ MT FFB processed b. May 2017: 0.15 litre/ MT FFB processed c. Jun 2017: 0.23 litre/ MT FFB processed <p>At the estates, diesel consumption per metric ton FFB was also monitored on a monthly basis. It was verified that energy usage are being monitored at the operating units for better control and comparison of trends. For example:</p> <ul style="list-style-type: none"> a. Bukit Benut estate: <ul style="list-style-type: none"> i. April 2017: 0.489 litre/ MT FFB processed ii. May 2017: 0.545 litre/ MT FFB processed iii. Jun 2017: 0.550 litre/ MT FFB processed b. Lambak/ Elaies estate: <ul style="list-style-type: none"> i. Mar 2017: 1.27l/mt FFB ii. Apr 2017: 1.84 l/mt FFB iii. Jun 2017: 0.65 l/mt FFB 	<p>Complied</p>
<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>		
<p>5.5.1</p> <p>There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -</p>	<p>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 visited estates. Method of land clearing and preparation was used such as (felling & chipping, cambering/land forming and path construction).</p>	<p>Complied</p>

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5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	No use of fire for land preparation during replanting Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.		
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Smoke emission was monitored using online system (CEMS-DIS) to DOE based on the transmitted data from boiler smoke density indicator and recorder. Emission result was found in compliance with the regulatory limit. Conducted by Procoma Laboratories (M) Sdn Bhd dated 7 February 2017. Regular monitoring was conducted by the mill by taking the sample of waste water in final discharge point on monthly basis and water at the final discharge, upstream and downstream of Mengkibol River. Monthly effluent monitoring records parameter monitored:- pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G by Sime Darby Research Sdn Bhd: a. Date: 19 May 2017; Ref no: IE567/2017 b. Date: 15 Feb 2017; Ref no: IE235/2017 c. Date: 12 Jan 2017; Ref no: IE85/2017 BOD limit for final discharge <3500 mg/L were met as well as all parameters that were within allowable limit.
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	For the estate, GHG emissions identified including CO _x , SO _x and NO _x from various sources including fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area. For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization. 5 years plan for GHG reduction (phase I, 20 mills (Malaysia) was sighted. Programme such as feed in tariff (FIT), flaring, CNG, CaP, Co-gen was included in the plan. The Carbon Emission Reduction Strategy is the overall implementation plan that cuts across SDP's value chain-upstream, downstream and other related business. The group target is to reduce emission by 40% at 2021.

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<p>5.6.3</p> <p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.</p> <p>- Minor compliance -</p>	<p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>The water samples were sent to Sime Darby R&D Laboratory for analysis. Records are maintained and verified on-site to have met the permissible regulatory limits. Quarterly reporting to DOE was also done and record documented. For example, water analysis report (no: IE190/2017) dated 14 Feb 2017 for the river in Bukit Benut Estate sighted during site visit.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied. The report prepared on for 2016.</p> <p>These GHG calculations were done as per certification unit basics including 5 estate and mill. Summary emissions:</p> <ul style="list-style-type: none"> a. Emission/ mt CPO= 1.28 tCO2 e/mt CPO b. Emission/ mt PK= 1.28 tCO2 e/mt PK <p>Details of GHG calculation can be found under Appendix K: GHG Reporting Executive Summary.</p>	<p>Complied</p>
<p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p>		
<p>Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>		
<p>6.1.1</p> <p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>- Major compliance -</p>	<p>Social Impact Assessment (SIA) was conducted on 16-19/5/2016 by Sustainability Strategy Unit, PSQM Department for whole SOU 22 Bukit Benut. The SIA was carried out through interview with relevant stakeholders, site visit and documentation review. Stakeholders involved in the SIA assessment such as local communities, contractors, VMO, police officer and etc.</p>	<p>Complied</p>
<p>6.1.2</p> <p>There shall be evidence that the assessment has been done with the participation of affected parties.</p> <p>- Major compliance -</p>	<p>The assessment was carried out with the participation of relevant stakeholders such as local communities, government authorities, contractors and etc. Seen the report with the issues raised by the affected parties.</p>	<p>Complied</p>

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6.1.3 Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	The Action Plan for Social Assessment/ Management Plan on Social Impact Assessment for mill and estates was established with the incorporation of issues raised during the stakeholder consultation for SIA. The action plan was developed on 1/7/2016 for the mill, 1/5/2017 for the Bukit Benut Estate and June 2017 for Lambak/ Elaeis Estate. The plan has stated the action to be taken with the person in charge and specific time frame to be completed.	Complied
6.1.4 The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The plan was reviewed on yearly basis and the last review was conducted on 1/7/2016 for the mill, 1/5/2017 for Bukit Benut Estate and June 2017 for Lambak/ Elaeis Estate.	Complied
6.1.5 Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	Not applicable as there is no smallholder scheme involved.	Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.		
6.2.1 Consultation and communication procedures shall be documented. - Major compliance -	SDPSB has developed Procedure for External Communication (Sime Darby Plantation Mill Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 2, issue date 25/5/2015). The procedure has detailing the process of handling complaints from stakeholders and the time frame for external communication to be dealt with.	Complied
6.2.2 A management official responsible for these issues shall be nominated. - Minor compliance -	The Mill Manager and Senior Assistant for the estates have been appointed as officer to handle any issue related to social. Appointment letter dated 1/7/2014 for Bukit Benut Estate and 7/7/2017 for Lambak Estate was sighted.	Complied
6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Stakeholder list was available for the mill and estates where local authorities, neighbouring smallholders and villagers, contractors and suppliers and workers' representatives were included into the list. Stakeholder meeting was conducted for mill and Bukit Benut Estate on 24/2/2017 with the participation of stakeholders such as contractors, neighbouring smallholders, local authorities, school representatives and etc. Attendance list and meeting minutes was sighted. Issues raised during the stakeholder meeting was in the progress of resolve. In Lambak Estate, stakeholder meeting was conducted on 20/6/2017 with the sundry shop owners and 21/6/2017 with local communities. All the issues raised during the meeting was incorporated into Social Action Plan.	Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.		

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6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	SDPSB has developed a Flowchart and Procedure on Handling Social Issues, Issue No. 1 dated 1/11/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	The mill has implemented Internal Complain Book and Record of Request Book. The complaints mainly related to housing repair such as toilet blockage, house door broken and etc. The management has taken action to resolve the complaints raised. House Repairs Books and Complaint Form was implemented in Bukit Benut Estate and Lambak Estate to record any complaints related to housing for the workers. The occupants have acknowledged on the complaint form once the management has completed the repair work.	Complied
Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP is as per in 6.4.1 above.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			

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<p>6.5.1 Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>Mill and estate have employed local and foreign workers. All the mill and estates workers are under direct employment. The payslip has included basic pay, allowances, working days, medical leave, deduction of salary such as NUPW and EPF and etc. Payslip for August 2016, April 2017 and June 2017 was sampled based on the crop summary as below:</p> <ul style="list-style-type: none"> a. Employee No.: 17538 (BBPOM) b. Employee No.: 83118 (BBPOM) c. Employee No.: 115036 (BBPOM) d. Employee No.: 121482 (BBPOM) e. Employee No.: 78563 (BBE) f. Employee No.: 100243 (BBE) g. Employee No.: 120764 (BBE) h. Employee No.: 123311 (BBE) i. Employee No.: 117697 (BBE) j. Employee No.: 17724 (BBE) k. Employee No.: 66132 (LE) l. Employee No.: 79757 (LE) m. Employee No.: 113210 (LE) n. Employee No.: 107354 (LE) <p>All the sampled workers have achieved the Minimum Wage Order 2016 of RM 1000/ month or RM 38.46/day.</p>	<p>Complied</p>

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<p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p>	<p>The mill and estates have employed local and foreign workers under direct employment. Employment contract and offer letters are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, holiday and annual leave, period of notice and etc. The contract was signed by the workers and sampled contracts as below:</p> <ul style="list-style-type: none"> a. Employee No.: 83118 (BBPOM) b. Employee No.: 115036 (BBPOM) c. Employee No.: 121482 (BBPOM) d. Employee No.: 123311 (BBE) e. Employee No.: 128487 (BBE) f. Employee No.: 104012 (LE) g. Employee No.: 133919 (LE) h. Employee No.: 127407 (LE) i. Employee No.: 132875 (LE) <p>Extension contract for the workers who have worked more than 2 years were available and sampled as below:</p> <ul style="list-style-type: none"> a. Employee No.: 82925; Expiry Date: 21/8/2017 (BBPOM) b. Employee No.: 80433; Expiry Date: 7/6/2018 (BBE) c. Employee No.: 64411; Expiry Date: 7/4/2018 (BBE) d. Employee No.: 17724; Expiry Date: 10/11/2017 (BBE) e. Employee No.: 96852; Expiry Date: 1/11/2017 (BBE) f. Employee No.: 67076; Expiry Date: 30/5/2018 (LE) g. Employee No.: 73237; Expiry Date: 16/10/2017 (LE) h. Employee No.: 66132; Expiry Date: 12/5/2018 (LE) 	<p>Complied</p>
<p>6.5.3</p> <p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>- Minor compliance –</p>	<p>The mill and estates’ management have provided free water usage up to 35 galloon per worker as stated in the employment contract. Besides, medical assistance was available without any charges for the workers. Government schools were available inside the estates’ compound where the children can easily access to the school. Linesite inspection was carried out on weekly basis by Medical Assistant/ Hospital Assistant in the mill and both estates. Housing complex/ nest/ community hall inspections checklist was utilized during linesite inspection. The last inspections were carried out on 12/7/2017, 6/7/2017, 23/6/2017 and 16/6/2017 for mill and Bukit Benut Estate and 11/7/2017, 4/7/2017, 28/6/2017 and 20/6/2017 for Lambak Estate.</p> <p>However, during site visit to the linesite in Lambak Estate found that the whole stretch of the drain in front of House No. 29B (P-11/2011) was blocked. It was also observed that breeding of mosquitoes larvae was happened in that drain. Thus, a minor NC was raised.</p>	<p>Minor nonconformance</p>

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6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance –	Adequate, sufficient and affordable foods were available in the estates' compound. Sundry shops were located in the compound and all the goods and foods with price tags displayed. Interviewed with the workers confirmed that the prices are reasonable.	Complied
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	SDPSB has implemented Social Policy dated January 2015 where the management is committed and respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively.	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	The workers are allowed to join union freely in the mill. The workers have conducted meeting with the management to discuss any issues related to the workers. The last meeting was conducted on 2/6/2017 with total 8 participants. Issues raised during the meeting has incorporated into action plan with person in charge and specific timeframe to resolve the issue. All the issues raised were still under progress. Meeting with NUPW representatives and management was carried out on 27/3/2017 with 4 attendees in Bukit Benut Estate. Issue raised by the Secretary was related to high deduction of salary for electricity which caused grievance among the workers. The Assistant has explained the reason to the Secretary and he has agreed on the explanation. Interviewed with the workers and NUPW representative confirmed that the issue has been resolved. In Lambak Estate, the NUPW meeting was carried out on 16/6/2017 with participation of 11 attendees where 4 representatives from management and 7 representatives from workers. Meeting minutes was sighted.	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	The company has developed Child Protection policy dated January 2015 and they are complied with the minimum age requirement. Through document review on the Employee Master List confirmed that all the workers are above 18 years old.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	SDPSB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.	Complied

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6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Through document reviewed on the list of employees found that the workers consisted of local and foreign workers, male and female workers. The management treated all the workers fairly and equally without any discrimination. No discrimination was sighted based on interview with the workers.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	There is no any discrimination based on religion, gender, nationality and etc during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPSB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Briefing of the policies was conducted on 5/6/2017 by Sustainability Unit, PSQM.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPSB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted on 5/6/2017 by Sustainability Unit, PSQM.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	SDPSB has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meeting was conducted quarterly according to the handbook. A Gender Committee was established by the mill and estates' management. The last meeting was conducted on 12/7/2017, 13/5/2017, 11/2/2017 and 12/11/2016 in mill, 18/7/2017, 20/4/2017 and 17/1/2017 in Bukit Benut Estate. Issue raised during the meeting was resolved accordingly. No sexual harassment case been report and confirmed through interviewed with the chairman and female workers. According to the handbook, the meeting shall be conducted quarterly (every 3 months once). However, in Lambak Estate, the meeting was conducted once a year and the last meeting was conducted on 19/7/2017 and 25/5/2016. Thus, a minor NC was raised.	Minor nonconformance
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.			

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Criterion / Indicator	Assessment Findings	Compliance
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Bukit Benut Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders. Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	Bukit Benut Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders. Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Contract agreement was verified during the audit and sampled contracts were as below: a. Ref. No.: T/PEN/CPO/0215/001 – CPO Transporter which valid for 3 years from 1/5/2016. b. AVN Brothers – Shovel with drivers provided which valid for 1 year from 1/7/2017. c. Ref. No.: T/SDPSB/PEN/FFB/0815/007 – FFB Transporter which valid for 2 years from 1/9/2016. The terms and conditions were stated in the agreement.
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	According to the agreement made, the payment to contractors shall be made once a month after 7 th in respect of work done in the preceding month. Interview with the contractors confirmed that the payment was made promptly according to the agreement. Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.		
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	The mill and estates’ management have made contribution to the local communities such as donation for primary school’s sport day, provided 5kgs of cooking oil and rice to all the workers every two months once, celebration of Hari Raya with workers, grass cutting in school compound, volleyball friendly match inter-SOU and etc. Through interview with the local communities confirmed that the management has provided assistance whenever they requested such as road grading and etc. Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No scheme smallholders involved in the operating unit. Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.		

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<p>6.12.1 There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -</p>	<p>All the employees that recruited possess the legal identification for local and valid passport and work permit for foreign workers. The workers were signed on the contract of employment prior commencement of work. Sampled of workers with valid work permit as below:</p> <ul style="list-style-type: none"> a. Permit No.: PD 8163105 valid until 11/6/2018 (BBPOM) b. Permit No.: PD 6464414 valid until 3/8/2017 (BBPOM) c. Permit No.: PD 8170275 valid until 2/6/2018 (BBPOM) d. Permit No.: PD 7983901 valid until 26/4/2018 (BBPOM) e. Permit No.: PD 5495517 valid until 15/8/2017 (BBPOM) f. Permit No.: PD 6916776 valid until 28/1/2018 (BBE) g. Permit No.: PD 7397069 valid until 26/4/2018 (BBE) h. Permit No.: PD 8165829 valid until 28/6/2018 (BBE) i. Permit No.: PD 6406352 valid until 4/11/2017 (BBE) j. Permit No.: PD 6554257 valid until 11/12/2017 (BBE) k. Permit No.: PD 7369449 valid until 2/2/2018 (LE) l. Permit No.: PD 8388474 valid until 21/7/2018 (LE) m. Permit No.: PD 6504870 valid until 19/10/2017 (LE) n. Permit No.: PD 6585478 valid until 7/11/2017 (LE) o. Permit No.: PD 6503253 valid until 2/10/2017 (LE) <p>Besides, the workers have signed on the passport retention letter by the employer and interviewed with the workers confirmed that they voluntarily surrendered the passport to the employers. They were able to get back the passport whenever they travelled to others states and back to home country for vacation.</p>	<p>Complied</p>
<p>6.12.2 Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance -</p>	<p>Interviewed with the foreign workers confirmed that no contract substitution has occurred. They have the similar job offer and living condition that explained in their home country and when they arrived to the estate.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	SDPSB has implemented a Sime Darby's Human Rights Charter on 13/1/2017, version 3.0 where they committed as below: <ul style="list-style-type: none"> a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. Ensuring favourable working conditions e. Enhancing Safety and Health f. And etc. <p>They also provided awareness and training to all the workers in order for them to understand their responsibility in respect of human rights. For eg: All the workers have provided with induction training in Sua Betong Estate prior their commencement of work. Seen the training certificates for the workers who have been sampled as below:</p> <ul style="list-style-type: none"> a. Employee No.: 80433 on 31/5/2012 (BBE) b. Employee No.: 92089 on 28/6/2013 (BBE) c. Employee No.: 123311 on 30/6/2016 (BBE) d. Employee No.: 128487 on 28/11/2016 (BBE) e. Employee No.: 100243 on 8/3/2014 (BBE) f. Employee No.: 134095 on 6/6/2017 (LE) g. Employee No.: 133920 on 1/6/2017 (LE) h. Employee No.: 131307 on 27/2/2017 (LE) 	Complied
Criterion 6.13: Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The Social and Humanity management policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations. Briefing of the policies was conducted on 5/6/2017 by Sustainability Unit, PSQM.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable for Peninsular Malaysia.	Not applicable
Principle 7: Responsible development of new plantings Bukit Benut Palm Oil Mill and supply base did not carry out any new plantings after November 2005. Therefore, the requirement of Principle 7 is not applicable during the annual surveillance. It was verified through the land statement, land title and planting history.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>Action plan for continual improvement has been implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill. Sighted some continual improvement project at SOU22</p> <ul style="list-style-type: none"> i)Safety – Minimize steam hazard at EFB conveyor (for lab operator) ii)Safety – fabricate a weighbridge stopper bracket (prevention of accident) iii)Process improvement – improve design of hydro cyclone dome (flange design for easy opening for maintenance) iv)Process improvement – fabricate new man hole for maintenance v)Environmental/pollution – installation of air pollution control system at boiler vi) Recycling of empty chemical container – based on National Recycling Programme vii)Continuous repair/upgrading of workers housing 	<p>Complied</p>

Appendix B: Approved Time Bound Plan

SDP- RSPO Certification Status for Malaysia Operations

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11-Aug-20	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	N.A
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543594	N.A

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9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	N.A
10	Bukit Puteri	Raub, Pahang	7 Jul '16	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020	N.A
11	Kerdu	Temerloh, Pahang	7 Jul '16	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019	N.A
12	Jabor	Kuantan, Pahang	7 Jul '16	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049	N.A
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-16	CU-RSPO-819163, SGS-RSPO/PM/MY13/01284, 824 502 16039	Recertification of Labu POM is in progress. PalmTrace License is valid till end of March 2017 in the PalmTrace system.
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	RSPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-19	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '16	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051	N.A
17	Kempas	Jasin, Melaka	19 May '10	18-May-20	RSPO 005	N.A
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	N.A
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-19	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	N.A
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	N.A
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	N.A
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	N.A

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23	Ulu Remis	Layang-layang, Johor	11 Apr '16	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042	N.A
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040	N.A
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	RSPO 547123	N.A
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-18	RSPO 537872	N.A
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	N.A
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	N.A
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	N.A
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	N.A
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	N.A
32	Rajawali	Bintulu, Sarawak	30 Dec '16	29-Dec-21	CU-RSPO-819167, RSPO 0020	N.A
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	N.A
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	N.A

Legends

Certification Withdrawal

NA - NOT APPLICABLE

Note: There are 2 certificate numbers for some SOUs due to transfer of CB.

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	MUTU-RSPO/011, SGS-RSPO/PC17-00005, SGS-RSPO/PC17-00005	
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	3-Jul-18	MUTU-RSPO/027	
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamakan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	16-Mar-17	MUTU-RSPO/014	Recertification of Bebunga POM is in progress.
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	
7	PT BAHARI GEMBIRARIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	9-Jul-17	MUTU-RSPO/019	
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamakan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/016	Recertification of Pondok Labu POM is in progress.

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10	PT BERSAMA SEJAHTERASAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/017	Recertification of Rantau Panjang POM is in progress.
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	05-Feb-22	MUTU-RSPO/009	
13		BETUNG		1-April-14	1-April-19	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU-RSPO/001	
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/015	Recertification of Selabak POM is in progress.
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	11-Sep-17	MUTU-RSPO/020	
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16	30-Nov-21	MUTU-RSPO/008	
19		MANDAH		1 April 2014	1 April 2019	MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	

21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	10-Jul-17	MUTU-RSPO/018	
22	PT SIME INDO AGRO	BKAJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	
23	PT PADANG PALMA PERMAI/PT PERKASA SUBURSAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	3-May-18	MUTU-RSPO/026	
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-19	MUTU-RSPO/044	
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab. Sanggau, Kalimantan Barat	NA	NA	NA	

Legends

Pending Certification	Mill closed down
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NA - NOT APPLICABLE

Appendix C: Certification Unit RSPO Certificate Details

Sime Darby Plantation Sdn Bhd
Strategic Operating Unit (SOU 22)
Bukit Benut Palm Oil Mill
KM 12, Jalan Mengkibol
86009 Kluang, Johor, Malaysia
RSPO membership number: 1-0008-04-000-00

BSI RSPO Certificate No. : RSPO 591229
Date of Initial Certificate Issued: 05/10/2011
Date of Expiry: 04/10/2021
Applicable Standards: RSPO P&C MYNI-2014; RSPO Supply Chain Certification Standard November 2014 Module D – CPO Mills: Identity Preserved)

Bukit Benut Palm Oil Mill and Supply Base					
Location Address	Strategic Operating Unit (SOU 22) – Bukit Benut Palm Oil Mill, KM 12, Jalan Mengkibol 86009 Kluang, Johor, Malaysia				
GPS Location	103° 20' 28"E ; 1° 56' 00"N				
CPO Tonnage Total	26,183.93				
PK Tonnage Total	6,388.88				
CPO Claimed for Certification*	26,183.93				
PK Claimed for Certification *	6,388.88				
Own estates FFB Tonnage	116,373				
Scheme Smallholder FFB Tonnage	-				
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Bukit Benut Estate	2,178.45	401.98	220.70	2,801.13	41,100
CEP Nyior Estate	978.38	509.52	50.84	1,538.74	7,800
Lambak Estate	3,137.79	183.02	423.95	3,744.76	67,473
TOTAL	6,294.62	1,094.52	695.49	8,084.63	116,373

**FFB from CEP Nyior diverted out to other Sime Daby's certified management unit.*

Appendix D: Assessment Plan

PRELIMINARY AGENDA					
Date	Time	Subjects	Mohd Hidhir	Boon Han	Ning Shing
Tuesday 18/7/2017	PM	Audit Team travelling to Kluang	√	√	√
Wednesday 19/7/2017 Bukit Benut Palm Oil Mill	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). • Verification on previous audit findings 	√	√	√
	09.00 – 12.00	Bukit Benut Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.30	Bukit Benut Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	16.30-17.00	Interim Closing briefing.	√	√	√
Thursday 20/7/2017 Bukit Benut Estate	08.30 – 12.00	Bukit Benut Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	-
	09.00 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.30	Bukit Benut Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30-17.00	Interim Closing Briefing	√	√	√
Friday 21/7/2017 Lambak Estate	8.30 – 13.00	Lambak Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	13.00 – 14.30	Lunch & Friday prayer	√	√	√

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PRELIMINARY AGENDA					
Date	Time	Subjects	Mohd Hidhir	Boon Han	Ning Shing
	14.30 – 16.30	Lambak Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30-17.30	Prepare for closing meeting Closing Meeting Audit Team Travelling back to KL	√	√	√

Appendix E: Stakeholders Contacted

<p>Internal Stakeholders</p> <p>Managers and Assistants Mill & Estate Male Mill Staff/Workers Female Mill Staff/Workers Foreign Worker Male and Female Estate workers Joint Consultative Committee Gender Committee representatives Workers Union Representatives Onsite NUPW representative/secretary Hospital Assistant Creche Attendant</p>	<p>Local Communities</p> <p>Village representative, Kampung Bukit Benut Village representative, Kampung Mengkibol</p>
<p>Government Departments</p>	<p>Contractors and Suppliers</p> <p>General Supplier FFB Transport contractor Smallholder</p>

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

Requirements	Compliance
D.1. Definition	
<p>D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p>	<p>Bukit Benut Palm Oil Mill only receives certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>
D.2 Explanation	
<p>D.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>D.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim). Verified transaction under license ID, CB45306 and physical delivery via spreadsheet for the delivery of palm product.</p>
D.3 Documented procedures	
<p>D.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements in these requirements; b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard. 	<p>Latest written documented procedures for the chain of custody is with Identity Preserved (IP) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version:2, issue: 2 dated October 2016. This developed based on the RSPO SCCS 21 November 2014. The previous SOP was for SG. The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive. The IP model is used because only certified FFB from own supply base is received and processed at Bukit Benut Palm Oil Mill.</p> <p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>
<p>D.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Bukit Benut Palm Oil mill has documented procedures (as per above in D 3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified and non-certified FFBs.</p>

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D.4 Purchasing and goods in	
D.4.1 The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	<p>Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Bukit Benut mill have system to verify at the weighbridge. Sample of weighbridge ticket for diversion crop:</p> <p><u>SOU 23 Ulu Remis (Cenas Ropel Estate)</u> Code : E-104, date:22/7/16, WB ticket# 68008, Field 2003A and 2003D (A crop), weight:12.95 mt</p> <p><u>SOU 23 Ulu Remis (Cenas Ropel Estate)</u> Code : E-104, date:20/7/16, WB ticket# 67945, Field 2001C and 2002A (A crop), weight:12.88 mt</p> <p><u>SOU 23 Ulu Remis (Cenas Ropel Estate)</u> Code : E-104, date:18/7/16, WB ticket# 67854, Field 1999A (A crop), weight:14.13 mt</p>
D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facilities aware of this procedure and stated in the procedure.
D.5 Record keeping	
D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.	<p>All the inventory records are maintained and updated on daily basis and monthly and reported on monthly and 3 monthly inventory. Computerized system in place. No PKO and PKE produced at Bukit Benut Palm Oil mill. PK is sold to Sime Darby's Kernel Crushing Plant and also other 3rd party KCP. CPO sold to Sime Darby's owned refineries (SDP Joma) and the other 3rd party buyer. Daily records are prepared at the entry point at the weighbridge.</p> <p>Sample of CPO contract and WB ticket: CPO Contract: December 2016 – S/C-PSD/1701/CPO0016B, delivery month : January 2017, completed March 2017. Date: 1/3/17, Lorry: NBQ6214, WB ticket# 006198, weight; 40.72mt.</p> <p>PK Contract: December 2016 – S/C-PSD/1262/PK1419, Date: 3/1/17, Lorry: JPQ6789, WB ticket# 006081, weight; 39.10 mt.</p> <p>Daily summary and monthly summary documented for all the FFB received. Records of certified FFB received verified during annual surveillance. Records verified by internal and external audit.</p>
D.6 Processing	
D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from noncertified material including during transport and storage.	During this assessment it was confirmed that only certified source of FFB from own plantation is processed. This ensures that there is no possibility of mixing during processing. There is a possibility that the mill will receive Certified FFB from other Sime Darby's Certified Estate which was certified under SOU23 (82450216042 valid until 20/4/21). This will be further verified during next surveillance assessment if such cases occurred and observed. No non-certified FFB received.

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D.6.2 The objective is for 100 % segregated material to be reached.	Processing and storage records can trace back to only certified segregated FFB and finish product (CPO and PK) through traceability records such as weighbridge records. This ensures that 100% segregated materials are reached.
---------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Actual Tonnage Certified Palm Production 01 July 2016 – 30 June 2017 (ASA1 1)

Mill	Capacity & Supply Chain Model	CPO	PK
Bukit Benut Palm Oil Mill	45 mt/hr Identity Preserved (IP)	20,537.84	4,691.54

Actual Sales of Certified Palm Products – 01 July 2016 – 30 June 2017 (ASA1 1)

Mill	Certified CPO Sales	Certified PK Sales	Remarks
Bukit Benut Palm Oil Mill	18,197.68 mt (Physical sales)	4,050 mt (Physical sales)	Confirmed sales through PalmTrace

Actual Tonnes Sales of Certified Palm Products (Under Other Schemes) - 01 July 2016 – 30 June 2017 (ASA1 1)

Mill	Certified CPO Sales	Certified PK Sales	Other Scheme(s)
Bukit Benut Palm Oil Mill	Nil	Nil	n/a

Actual Tonnes Sales of Conventional Palm Products - 01 July 2016 – 30 June 2017 (ASA1 1)

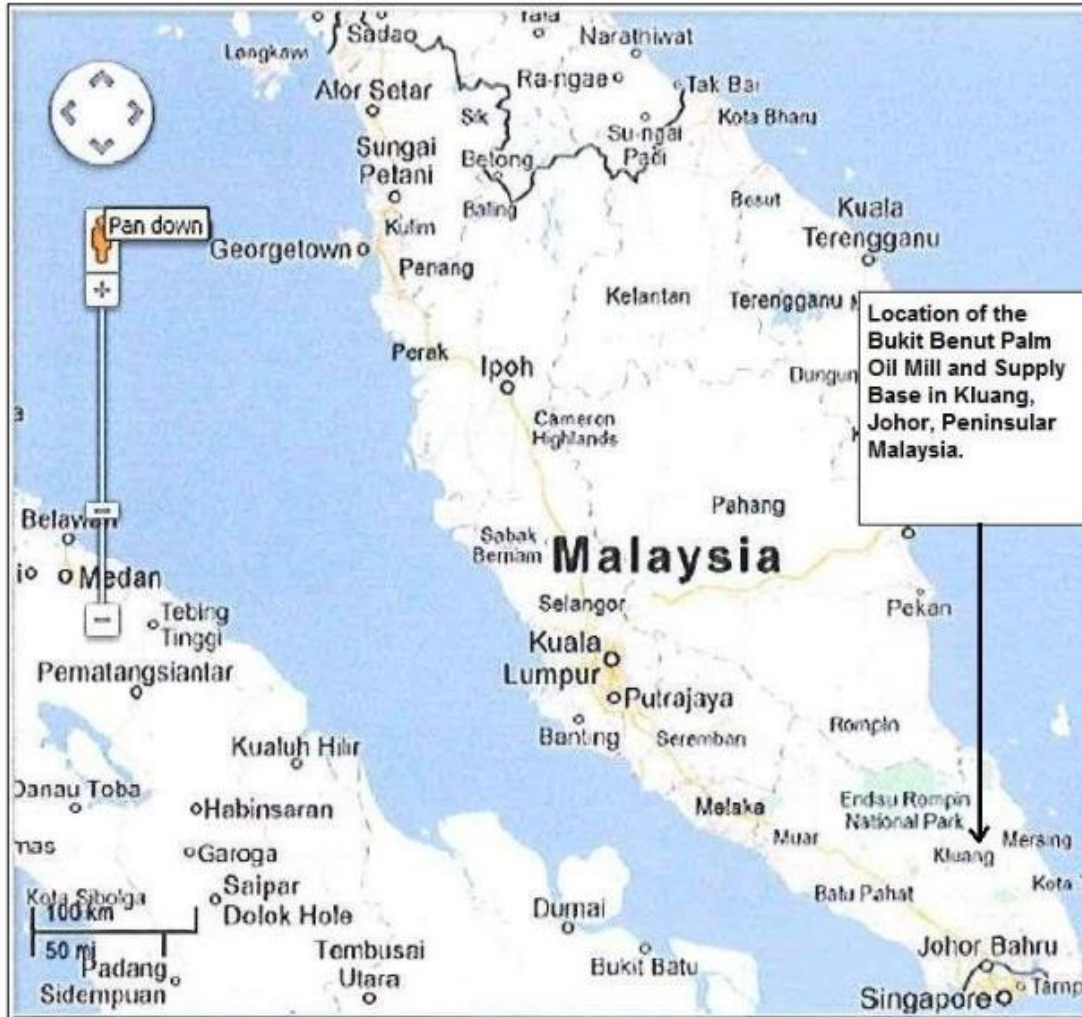
Mill	Conventional CPO Sales	Conventional PK Sales	Remarks
Bukit Benut Palm Oil Mill	2,340.16	641.54	n/a

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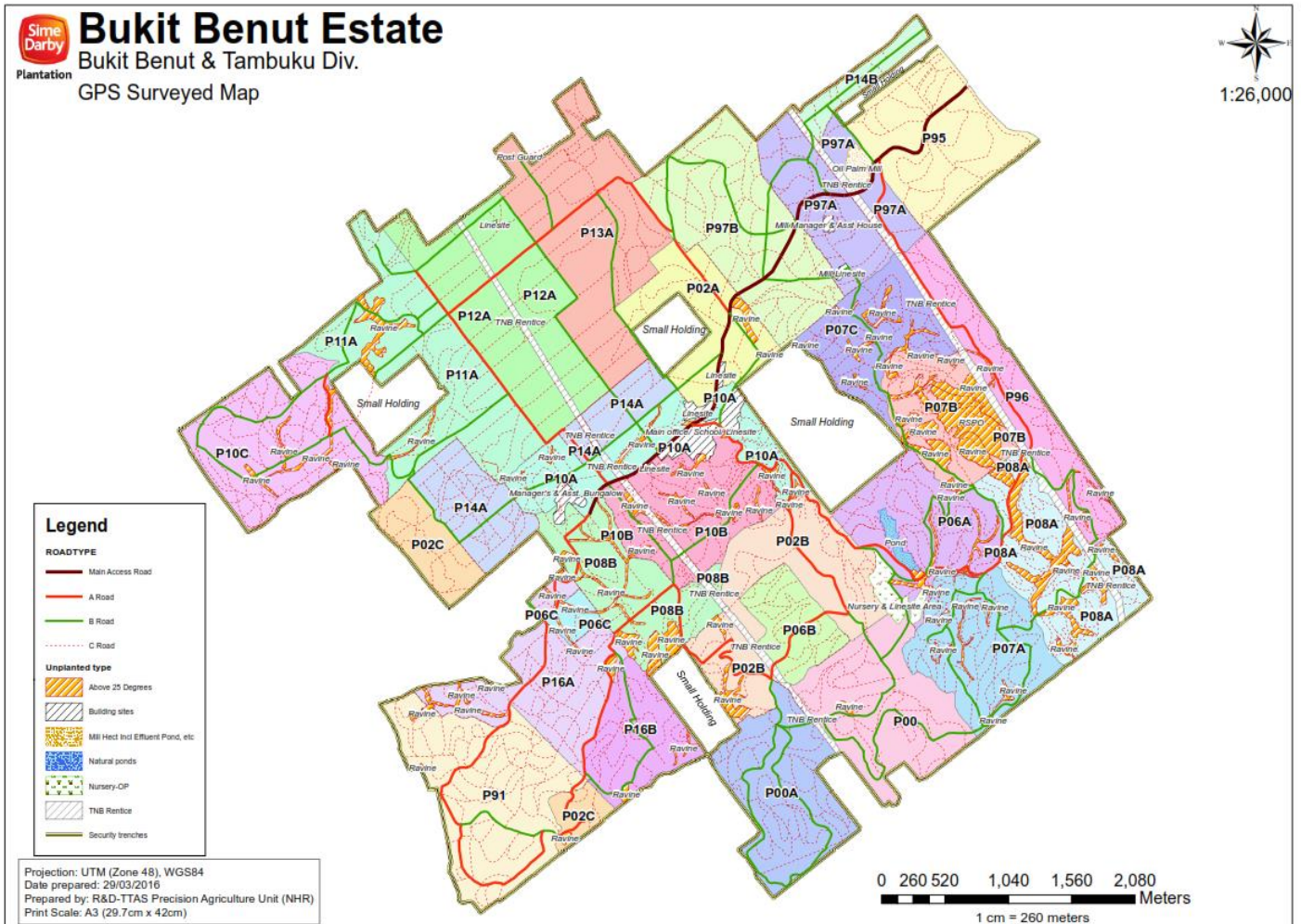
Actual Tonnage Certified FFB Received Monthly by the mill - 01 July 2016 – 31 June 2017 (ASA1 1)

Month	Bukit Benut	CEP Nyior	Lambak	Cenas estate	Total FFB/Month
July 2016	3204.78	686.84	5793.13	266.27	9951.02
Aug 2016	3558.58	641.26	6468.87	0	10668.71
Sept 2016	3984.12	0	6119.10	0	10103.22
Oct 2016	4104.49	748.24	6096.68	0	10949.41
Nov 2016	3864.63	26.57	6385.30	0	10276.5
Dec 2016	3232.44	1230.07	5112.14	0	9574.65
Jan 2017	2527.85	1469.75	3649.59	0	7647.19
Feb 2017	2430.11	1373.03	3398.48	0	7201.62
Mar 2017	1970.13	863.73	2579.07	0	5412.93
Apr 2017	1854.98	351.08	2428.01	0	4634.07
May 2017	2547.75	0	3511.23	0	6058.98
June 2017	2339.34	242.94	4183.23	0	6765.51
TOTAL	35619.2	7633.51	55724.83	266.27	99243.81

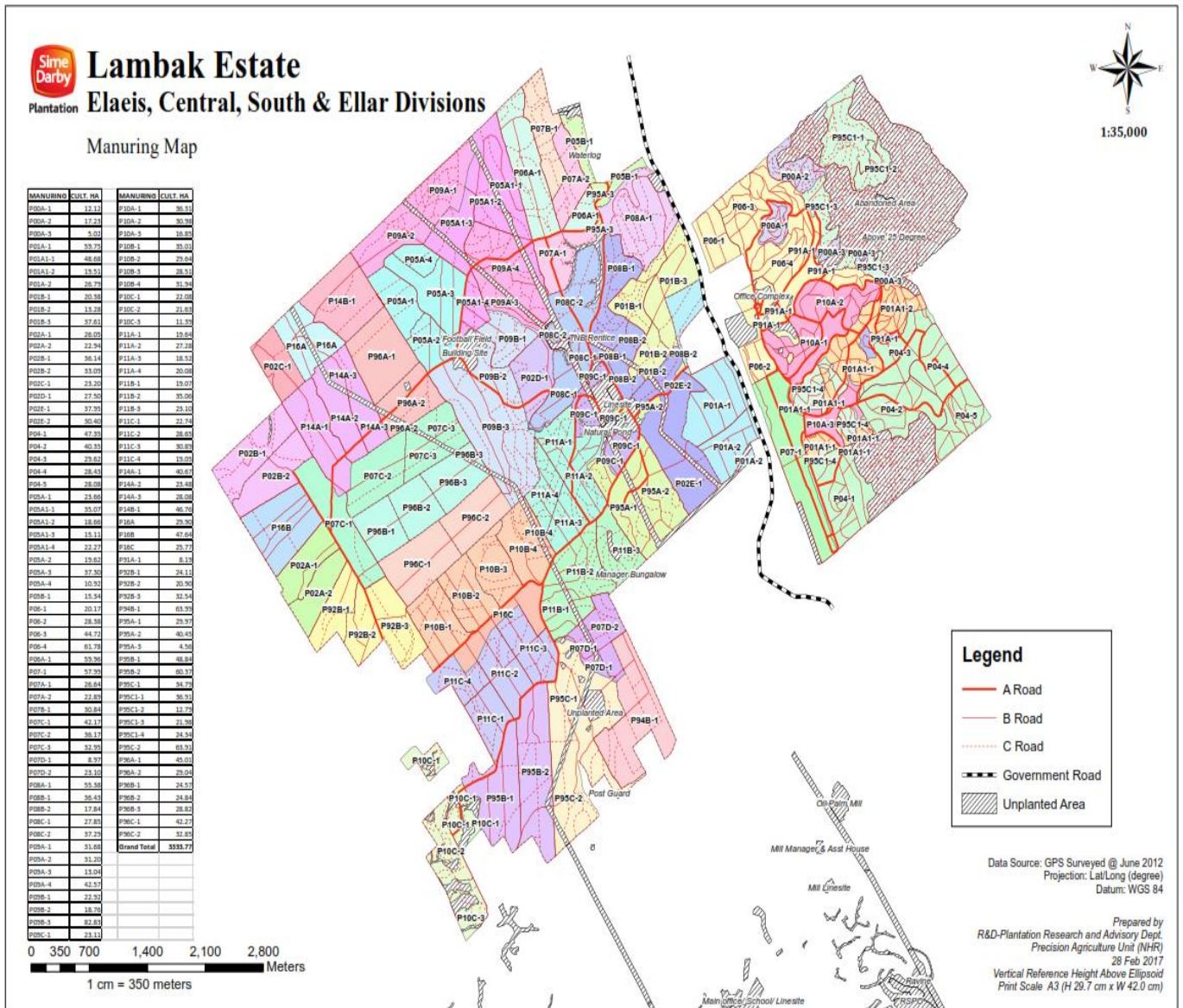
Appendix G : Location Map of Bukit Benut POM and Supply Bases



Appendix H: Bukit Benut Estate Field Map



Appendix I: Lambak Estate Field Map



Appendix J: GHG Reporting Executive Summary

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

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

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

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	1.28	OER	21.24
PKO	1.28	KER	4.69

Production	t/yr	Land Use	Ha
FFB Process	103913.27	OP Planted Area	9,112.73
CPO Produced	22,075.92	OP Planted on peat	0
PKO Produced	4,872.36	Conservation (forested)	0
		Conservation (non-forested)	0
		Total	9,112.73

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	58,949.17	0.57	391.19	0.59	0	0	59,340.36	1.16
CO ₂ Emission from fertilizer	5,578.59	0.06	43.01	0.06	0	0	5,621.60	0.12
NO ₂ Emmission	3,790.03	0.04	22.64	0.03	0	0	3,812.67	0.07
Fuel Consumption	530.50	0.01	3.21	0	0	0	533.71	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-55,875.99	-0.54	-370.79	-0.56	0	0	-56,246.78	-1.10
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	1,2972.30	0.13	89.26	0.13	0	0	13,061.56	0.26

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	20,368.76	0.2
Fuel Consumption	36.75	0
Grid Electricity	1050.77	0.01
Utilisation	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	21,456.78	0.21

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	6,240.97
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

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

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

Appendix K: List of Abbreviations Used

AMESU	All Malaysia Estate Staff Union
AN	Ammoniacal Nitrogen
ASA	Annual Surveillance Assessment
BAE	Bukit Asahan Estate
BBPOM	Bukit Benut Palm Oil Mill
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CIP	Continual Improvement Plan
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
DJPOM	Diamond Jubilee Palm Oil Mill
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ERP	Emergency Response Plan
FFB	Fresh Fruit Bunch
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MAPA	Malayan Agricultural Producers Association
MPOA	Malaysian Palm Oil Association
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
MY-NI	Malaysian National Interpretation
NGO	Non Governmental Organisation
NUPW	National Union of Plantation Workers
OSH	Occupational Safety & Health
O&G	Oil and Grease
PK	Palm Kernel
PKO	Palm Kernel Oil
PKE	Palm Kernel Expeller
POM	Palm Oil Mill
PPE	Personal Protective Equipment
RED	Renewable Energy Directive
RSPO	P&C Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SDPSB	Sime Darby Plantation Sdn Bhd
SE	Serkam Estate
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SOU	Strategic Operating Unit
SS	Suspended Solids
TS	Total Solids
VFA	Volatile Fatty Acids