

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment 1\_4**
- Recertification Assessment
- Extension of Scope

|   |
|---|
| <b>Sime Darby Plantation Berhad</b>   |
| Client company Address:<br>Level 5, Main Block, Plantation Tower, No 2, Jalan PJU 1A/7, Ara Damansara, 47301<br>Petaling Jaya, Selangor, Malaysia |
| Certification Unit:<br><b>Strategic Operating Unit (SOU) 18</b><br><b>Diamond Jubilee Palm Oil Mill</b>   |
| Location of Certification Unit:<br>KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia  |

**TABLE of CONTENTS**

**Page No**

|   |     |
|---|-----|
| Section 1: Scope of the Certification Assessment.....   | 4   |
| 1.    Company Details .....   | 4   |
| 2.    Certification Information .....   | 4   |
| 3.    Other Certifications.....   | 4   |
| 4.    Location(s) of Mill & Supply Bases .....  | 5   |
| 5.    Description of Supply Base .....  | 5   |
| 6.    Plantings & Cycle.....  | 5   |
| 7.    Certified Tonnage of FFB (Own Certified Scope) .....  | 6   |
| 8.    Certified Tonnage of FFB (from other certified unit(s)) if applicable *.....                    | 6   |
| 9.    Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable ..... | 6   |
| 10.   Certified Tonnage .....   | 7   |
| 11.   Actual Sold Volume (CPO) .....  | 7   |
| Current License period (Oct 2019-June 2020) .....   | 7   |
| 12.   Actual Sold Volume (PK) .....   | 7   |
| 13.   Actual Group certification Claims .....   | 7   |
| Section 2: Assessment Process .....   | 8   |
| 2.1   Assessment Methodology, Programme, Site Visits.....   | 8   |
| 2.2   BSI Assessment Team: .....  | 10  |
| 2.3   Assessment Plan .....   | 11  |
| Section 3: Assessment Findings .....  | 13  |
| 3.1   Normative requirement applied for this assessment:.....   | 13  |
| 3.2   Multiple Management Units and Time Bound Plan .....   | 13  |
| 3.3   Progress of scheme smallholders and/or outgrowers .....   | 15  |
| 3.4   Details of Nonconformities .....  | 15  |
| 3.4.1 Status of Nonconformities Previously Identified and Observations .....                          | 22  |
| 3.4.2 Summary of the Nonconformities and Status.....  | 24  |
| 3.5   Stakeholders and previous land owner / user consultation .....                                  | 24  |
| 3.6   Impartiality and conflict of interest .....   | 27  |
| Formal Signing-off of Assessment Conclusion and Recommendation .....                                  | 27  |
| Appendix A: Summary of Findings .....   | 28  |
| Appendix B: Approved Time Bound Plan.....   | 127 |
| Appendix C: GHG Reporting Executive Summary .....   | 134 |
| Appendix D: Supply Chain Declaration.....   | 136 |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

Appendix E: Location Map of Certification Unit and Supply bases.....142  
Appendix F: Diamond Jubilee Estate Field Map.....143  
Appendix G: Bukit Asahan Estate Field Map .....144  
Appendix H: Welch Estate Field Map .....145  
Appendix I: List of Smallholder Sampled.....146  
Appendix J: List of Abbreviations .....147

## Section 1: Scope of the Certification Assessment

| 1. Company Details   |  |                                 |  |
|--|--|---------------------------------|--|
| <b>Parent Company</b>  | Sime Darby Plantation Berhad   |                                 |  |
| <b>RSPO Membership Number</b>                                      | 1-0008-04-000-00   | <b>Membership Approval Date</b> | 07/09/2004   |
| <b>Address</b>   | Level 5, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia |                                 |  |
| <b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b> | Strategic Operating Unit (SOU) 18 – Diamond Jubilee Palm Oil Mill                                    |                                 |  |
| <b>Location / Address</b>  | KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia                                      |                                 |  |
| <b>Website</b>   | <a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>                         |                                 |  |
| <b>Management Representative</b>                                   | Shylaja Devi Vasudevan Nair (Head, Sustainability Unit)<br>Syahrul bin Saramlah (SOU Chairman)       | <b>E-mail</b>                   | <a href="mailto:shylaja.vasudevan@simedarbyplantation.com">shylaja.vasudevan@simedarbyplantation.com</a><br><a href="mailto:syahrul.saramlah@simedarbyplantation.com">syahrul.saramlah@simedarbyplantation.com</a> |
| <b>Telephone</b>   | +603-78484379 (HQ)<br>+607-787 5100 (Mill)   | <b>Facsimile</b>                | +603-78484356 (HQ)<br>+606-5292 019 (Mill)   |

| 2. Certification Information  |  |                                    |            |
|-------------------------------|--|------------------------------------|------------|
| <b>Certificate Number</b>     | RSPO 591224  | <b>Date of First Certification</b> | 05/10/2011 |
|                               |  | <b>Certificate Start Date</b>      | 05/10/2016 |
|                               |  | <b>Certificate Expiry Date</b>     | 04/10/2021 |
| <b>Scope of Certification</b> | Production of Certified Sustainable Crude Palm Oil and Palm Kernel   |                                    |            |
| <b>Visit Objectives</b>       | <ul style="list-style-type: none"> <li>Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>   |                                    |            |
| <b>Applicable Standards</b>   | <input type="checkbox"/> RSPO P&C 2018 with supply chain Module <input type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance<br><input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 with supply chain Module <input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance |                                    |            |

| 3. Other Certifications |   |                               |             |
|-------------------------|---|-------------------------------|-------------|
| Certificate Number      | Standard(s)   | Certificate Issued by         | Expiry Date |
| MSPO 682043             | MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills | BSI Services Malaysia Sdn Bhd | 09/01/2023  |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|             |  |                               |            |
|-------------|--|-------------------------------|------------|
| MSPO 688335 | MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders | BSI Services Malaysia Sdn Bhd | 09/01/2023 |
| MSPO 714120 | MSPO Supply Chain Certification Standard   | BSI Services Malaysia Sdn Bhd | 11/07/2024 |

| 4. Location(s) of Mill & Supply Bases |   |                 |                |
|---------------------------------------|---|-----------------|----------------|
| Name<br>(Mill / Supply Base)          | Location  | GPS Coordinates |                |
|                                       |   | Latitude        | Longitude      |
| Diamond Jubilee Palm Oil Mill         | KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia | 2° 19' 29" N    | 102° 28' 59" E |
| Diamond Jubilee Estate                | KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia | 2° 19' 50" N    | 102° 29' 18" E |
| Bukit Asahan Estate                   | Ladang Bukit Asahan, Jalan Asahan 77100 Melaka, Malaysia        | 2° 23' 38" N    | 102° 32' 45" E |
| Welch Estate                          | Jalan Segamat - Jementah, 85200 Segamat, Johor                  | 2° 27' 22" N    | 102° 39' 12" E |

\*Serkam Estate has been switched place by Welch Estate as a supply base to the Diamond Jubilee POM

| 5. Description of Supply Base |  |             |                                   |                    |              |
|-------------------------------|--|-------------|-----------------------------------|--------------------|--------------|
| Estate                        | Total Planted<br>(Mature + Immature)<br>(ha) | HCV<br>(ha) | Infrastructure<br>& Other<br>(ha) | Total Area<br>(ha) | % of Planted |
| Diamond Jubilee Estate        | 2,506.97                                     | 21.48       | 307.74                            | 2,836.19           | 88.39%       |
| Bukit Asahan Estate           | 2,965.53                                     | 1.36        | 105.30                            | 3,072.19           | 96.53%       |
| Welch Estate                  | 576.20                                       | 0.95        | 870.67                            | 1,447.82           | 39.80%       |
| <b>Total</b>                  | 6,048.70                                     | 23.79       | 1,283.71                          | 7,356.20           | 82.23%       |

\*Diamond Jubilee Estate area reduced by 136.02 ha due to land acquisition by Syarikat Paduwan & State Gov. for *Projek Rumah Penjawat Awam 1Malaysia*

| 6. Plantings & Cycle   |             |        |          |         |         |          |          |
|------------------------|-------------|--------|----------|---------|---------|----------|----------|
| Estate                 | Age (Years) |        |          |         |         | Mature** | Immature |
|                        | 0 - 3       | 4 - 10 | 11 - 20  | 21 - 25 | 26 - 30 |          |          |
| Diamond Jubilee Estate | 441.83      | 574.40 | 1,299.06 | 191.68  | -       | 2,065.14 | 441.83   |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|                     |               |               |                 |               |              |                 |               |
|---------------------|---------------|---------------|-----------------|---------------|--------------|-----------------|---------------|
| Bukit Asahan Estate | 206.53        | 324.80        | 2,261.48        | 149.67        | 23.05        | 2,759.00        | 206.53        |
| Welch Estate        | -             | -             | 543.16          | 33.04         | -            | 576.20          | -             |
| <b>Total</b>        | <b>648.18</b> | <b>899.20</b> | <b>4,103.70</b> | <b>374.39</b> | <b>23.05</b> | <b>5,400.34</b> | <b>648.36</b> |

\*Diamond Jubilee Estate area reduced by 136.02 ha due to land acquisition by Syarikat Paduwan at Field 2008 (Union Div.)

| <b>7. Certified Tonnage of FFB (Own Certified Scope)</b> |  |                                       |   |
|--|--|---------------------------------------|---|
| <b>Estate</b>  | <b>Tonnage / year</b>                    |                                       |   |
|  | <b>Estimated<br/>(Oct 2019-Sep 2020)</b> | <b>Actual<br/>(Aug 2019-Jun 2020)</b> | <b>Forecast<br/>(Oct 2020-Sep 2021)</b> |
| Diamond Jubilee Estate                                   | 64,377.17                                | 25,586.66                             | 54,000.00                               |
| Bukit Asahan Estate                                      | 58,080.00                                | 47,485.12                             | 59,303.00                               |
| Welch Estate   | -  | 7,709.41                              | 11,696.00                               |
| <b>Total</b>   | <b>122,457.17</b>                        | <b>80,781.19</b>                      | <b>124,999.00</b>                       |

| <b>8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *</b> |  |                                       |   |
|---|--|---------------------------------------|---|
| <b>Estate</b>   | <b>Tonnage / year</b>                    |                                       |   |
|   | <b>Estimated<br/>(Oct 2019-Sep 2020)</b> | <b>Actual<br/>(Aug 2019-Jun 2020)</b> | <b>Forecast<br/>(Oct 2020-Sep 2021)</b> |
| Kempas Estate   | N/A                                      | 235.85                                | N/A                                     |
| Serkam Estate   |  | 272.74                                |   |
| Kemuning Estate   |  | 824.50                                |   |
| Tangkah Estate  |  | 3,626.42                              |   |
| <b>Total</b>  |  | <b>4,959.51</b>                       |   |

| <b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b> |  |                                       |   |
|---|--|---------------------------------------|---|
| <b>Independent FFB Supplier</b>   | <b>Tonnage / year</b>                    |                                       |   |
|   | <b>Estimated<br/>(Oct 2019-Sep 2020)</b> | <b>Actual<br/>(Aug 2019-Jun 2020)</b> | <b>Forecast<br/>(Oct 2020-Sep 2021)</b> |
| Nil   | N/A                                      | N/A                                   | N/A                                     |
| <b>Total</b>  | <b>N/A</b>                               | <b>N/A</b>                            | <b>N/A</b>                              |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

| <b>10. Certified Tonnage</b>       |  |                                       |   |
|------------------------------------|--|---------------------------------------|---|
|                                    | <b>Estimated<br/>(Oct 2019-Sep 2020)</b> | <b>Actual<br/>(Aug 2019-Jun 2020)</b> | <b>Forecast<br/>(Oct 2020-Sep 2021)</b> |
|                                    | <b>FFB</b>                               | <b>FFB</b>                            | <b>FFB</b>                              |
| <b>Mill Capacity:<br/>25 MT/hr</b> | 162,957.31                               | 85,740.70                             | 124,999.00                              |
| <b>SCC Model:<br/>IP/MB</b>        | <b>CPO (OER: 21.80%)</b>                 | <b>CPO (OER: 21.31 %)</b>             | <b>CPO (OER: 21.50 %)</b>               |
|                                    | 35,524.69                                | 18,271.21                             | 26,874.78                               |
|                                    | <b>PK (KER: 5.30 %)</b>                  | <b>PK (KER: 5.23 %)</b>               | <b>PK (KER: 5.50 %)</b>                 |
|                                    | 8,636.73                                 | 4,486.78                              | 6,874.95                                |

| <b>11. Actual Sold Volume (CPO)</b>                |                       |                                |               |                     |              |
|--|-----------------------|--------------------------------|---------------|---------------------|--------------|
| <b>Current License period (Oct 2019-June 2020)</b> |                       |                                |               |                     |              |
|  | <b>RSPO Certified</b> | <b>Other Schemes Certified</b> |               | <b>Conventional</b> | <b>Total</b> |
|  |                       | <b>ISCC</b>                    | <b>Others</b> |                     |              |
| <b>CPO (MT)</b>                                    | 11,752.63             | -                              | -             | 657.92              | 12,410.55    |
| <b>Previous License period (Aug 2019-Sep 2019)</b> |                       |                                |               |                     |              |
| <b>CPO (MT)</b>                                    | 2,611.70              | -                              | -             | 146.21              | 2,757.91     |

| <b>12. Actual Sold Volume (PK)</b>                 |                       |                                |               |                     |              |
|--|-----------------------|--------------------------------|---------------|---------------------|--------------|
| <b>Current License period (Oct 2019-June 2020)</b> |                       |                                |               |                     |              |
|  | <b>RSPO Certified</b> | <b>Other Schemes Certified</b> |               | <b>Conventional</b> | <b>Total</b> |
|  |                       | <b>ISCC</b>                    | <b>Others</b> |                     |              |
| <b>PK (MT)</b>                                     | 805.01                | -                              | -             | 563.36              | 1,368.37     |
| <b>Previous License period (Aug 2019-Sep 2019)</b> |                       |                                |               |                     |              |
| <b>PK (MT)</b>                                     | 178.89                | -                              | -             | 125.19              | 304.08       |

| <b>13. Actual Group certification Claims</b> |               |                             |
|--|---------------|-----------------------------|
|  | <b>Credit</b> | <b>Physical Volume (MT)</b> |
| <b>IS-CSPO</b>                               | N/A           | N/A                         |
| <b>IS-CSPKO</b>                              | N/A           | N/A                         |
| <b>IS-CSPKE</b>                              | N/A           | N/A                         |

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site surveillance assessment was conducted from 7-10 July 2020. 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. 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 Major NC close out assessment was conducted off-site based on the nature of the issue and its CAP that could be verified through documented information. The audit programs are included in Section 2.3.

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 P&C MYNI 2019 and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance.

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 minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (0.8\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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



**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

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.

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

| <b>Assessment Program</b>            |                                     |                             |                             |                             |                             |
|--------------------------------------|-------------------------------------|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| <b>Name<br/>(Mill / Supply Base)</b> | <b>Year 1<br/>(Recertification)</b> | <b>Year 2<br/>(ASA 1_1)</b> | <b>Year 3<br/>(ASA 1_2)</b> | <b>Year 4<br/>(ASA 1_3)</b> | <b>Year 5<br/>(ASA 1_4)</b> |
| Diamond Jubilee Palm Oil Mill        | ✓                                   | ✓                           | ✓                           | ✓                           | ✓                           |
| Diamond Jubilee Estate               | ✓                                   | -                           | ✓                           | ✓                           | ✓                           |
| Bukit Asahan Estate                  | -                                   | ✓                           | ✓                           | ✓                           | ✓                           |
| Welch Estate                         | -                                   | -                           | -                           | -                           | ✓                           |

**Tentative Date of Next Visit:** June 28, 2021 - July 1, 2021

**Total No. of Mandays:** 12 man-days

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

**2.2 BSI Assessment Team:**

| <b>Team Member Name</b> | <b>Role</b><br><i>(Team Leader or Team member)</i> | <b>Qualifications</b><br><i>(Short description of the team members)</i>   |
|-------------------------|--|---|
| Hafriazhar Mohd Mokhtar | Team Leader  | Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 9001, ISO 14001, ISO 45001 and ISO 50001 and has accumulated more than 1000 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards since 2011 and completed his RSPO P&C and SCCS Lead Assessor courses successfully. He has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon, Nigeria and Pakistan. During this assessment, he assessed on the aspects of legal, social and stakeholder engagement as well as the RSPO supply chain requirements. Able to communicate in Bahasa Malaysia and English                               |
| Muhammad Fadzli Masran  | Team Member  | Fadzli graduated in Bachelor of Forestry Science at University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO9001 and ISO14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. During this assessment, he assessed the aspects of Occupational, Health & Safety and mill best practises. Able to communicate in Bahasa Malaysia and English. |
| Ragu Samy Erulappan     | Team Member  | Ragu Erulappan is a fulltime employee with BSI Services Malaysia. He graduated from University Technology Malaysia. He attended internal RSPO training in 22 December 2014. He has completed ISO 9001:2008 Quality Management System Lead Auditor training, ISO 14001 and ISO 18001 Lead Auditor Training. Currently he is an ISO 9001:2008, ISO 14001 and ISO 18001 Lead Auditor. He has more than 5 years of auditing experience since August 2010 covering Environment, Safety and Health, Legal aspects in various industries. He is involved as Environment, Safety and Health Auditor during the RSPO Assessment. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.   |

**Accompanying Persons:**

| <b>Name</b>    | <b>Role</b>  |
|----------------|--|
| Mohamed Hidhir | <b>BSI Qualifying Reviewer</b> (observer-no assessment coverage) |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

**2.3 Assessment Plan**

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

| Date   | Time        | Subjects  | HMM | MFM | RSE | MH |
|--|-------------|---|-----|-----|-----|----|
| Monday,<br>6/7/2020  | PM          | Travel to Melaka  | ✓   | ✓   | ✓   | -  |
| Tuesday,<br>7/7/2020<br><br><b>Diamond Jubilee Palm Oil Mill</b> | 0830 – 0900 | Opening Meeting (with MSPO @ DJ Estate Clubhouse):<br><ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader</li> <li>Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation)</li> <li>Verification on previous audit findings</li> </ul>               | ✓   | ✓   | ✓   | -  |
|  | 0900 – 1230 | <b>Diamond Jubilee Palm Oil Mill:</b> Inspection of 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.       | ✓   | ✓   | ✓   | -  |
|  | 1230 – 1330 | Lunch break   | ✓   | ✓   | ✓   | -  |
|  | 1330 – 1630 | <b>Diamond Jubilee Palm Oil Mill:</b> Lab, 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 | ✓   | ✓   | ✓   | -  |
|  | 1630 – 1700 | Interim briefing  | ✓   | ✓   | ✓   | -  |
| Wednesday<br>8/7/2020<br><br><b>Welch Estate</b>                 | 0830 - 1230 | <b>Welch Estate:</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc. | -   | ✓   | ✓   | -  |
|  | 1000 – 1230 | Stakeholder consultation  | ✓   | -   | -   | -  |
|  | 1230 – 1330 | Lunch break   | ✓   | ✓   | ✓   | -  |

| Date  | Time        | Subjects  | HMM | MFM | RSE | MH |
|---|-------------|---|-----|-----|-----|----|
|   | 1330 - 1630 | <b>Welch Estate:</b> 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.)           | ✓   | ✓   | ✓   | -  |
|   | 1630 - 1700 | Interim briefing  | ✓   | ✓   | ✓   | -  |
| Thursday<br>9/7/2020<br><br><b>Diamond Jubilee Estate</b> | 0830 - 1230 | <b>Diamond Jubilee Estate:</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc.               | ✓   | ✓   | ✓   | -  |
|   | 1230 - 1330 | Lunch break   | ✓   | ✓   | ✓   | -  |
|   | 1330 - 1630 | <b>Diamond Jubilee Estate:</b> 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.) | ✓   | ✓   | ✓   | -  |
|   | 1630 - 1700 | Interim briefing  | ✓   | ✓   | ✓   | -  |
| Friday<br>10/7/2020<br><br><b>Bukit Asahan Estate</b>     | 0830 - 1230 | <b>Bukit Asahan Estate:</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc.                  | ✓   | ✓   | ✓   | ✓  |
|   | 1230 - 1330 | Lunch break   | ✓   | ✓   | ✓   | ✓  |
|   | 1330 - 1630 | <b>Bukit Asahan Estate:</b> 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.)    | ✓   | ✓   | ✓   | ✓  |
|   | 1630 - 1700 | Closing meeting (@ DJ Estate Clubhouse)   | ✓   | ✓   | ✓   | ✓  |

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- Sime Darby Plantation Berhad Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Malaysia National Interpretation 2019 for RSPO P&C 2018
- Independent Smallholder Standard 2019

#### 3.2 Multiple Management Units and Time Bound Plan

| Requirement  | Assessment  | Compliance |
|--|---|------------|
| Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?  | Yes. Please refer to appendix B for details on the mills and estates of Sime Darby Plantations Berhad Group.  | Complied   |
| Have all the estates and mills certified within five years after obtaining RSPO membership?  | No, Target to receive certification for two management units [SDP Liberia and PT Mitra Austral Sejahtera (PT MAS)] shifted to end 2020:<br><br>- SDP Liberia operation has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was put on-hold due to security & safety issue. After due consideration on the current engagement with the House of Representative in Liberia, the time bound plan of RSPO Certification for SDP Liberia is set to 2019/2020 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process. The progress of the above is under management monitoring for readiness towards certification.<br><br>- SDP has also been addressing the legacy social issues at PT MAS and regularly updating the progress status to resolve this case to RSPO and other relevant stakeholders. | Complied   |
| Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available. | Yes, two newly acquired management units under Markham Farming Company Limited are targeted for certification by end 2020.  | Complied   |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|--|---|-----------------|
| <p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.<br/>Is this consistent with the ACOP reporting?</p>   | <p>Yes, changes due to issue in Liberia concession and two newly acquired management units under Markham Farming Company Limited that were targeted for certification by end 2020.<br/><br/>This was consistent with RSPO Annual Communications of Progress 2019 reporting.</p>   | <p>Complied</p> |
| <p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>   | <p>No, there has not been any isolated lapses.</p>  | <p>Complied</p> |
| <p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>   | <p>No, there is no fundamental failure.</p>   | <p>Complied</p> |
| <b>Un-Certified Units or Holdings</b>  |   |                 |
| <p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>  | <p>Replacement took place in newly acquired units in Papua New Guinea, Markham Farms. The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore the Remediation and Compensation Procedure will be required to be fulfilled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit the mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration.</p> | <p>Complied</p> |
| <p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>   | <p>As above, the Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit the mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration.</p>  | <p>Complied</p> |
| <p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 2.2, 6.4, 7.5 and 7.6.<br/><i>Note:</i><br/>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities<br/><a href="https://www.rspo.org/certification/remediation-and-">https://www.rspo.org/certification/remediation-and-</a></p> | <p>Based on RSPO RACP tracker, a total of 17 Management Units with potential liability, 15 LUCA submitted, 14 Concept Note approved and 14 Compensation Plan submitted.</p>   | <p>Complied</p> |

|   |   |          |
|---|---|----------|
| <a href="#">compensation/racp-tracker</a> . The progress on the Liabilities shall be verified and reported.   |   |          |
| Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.                                     | No labour dispute reported in the uncertified units.  | Complied |
| Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1                                 | No legal non-compliance reported in the uncertified units.  | Complied |
| Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available. | Yes. As part of the RSPO P&C compliance, internal audit has been conducted at the uncertified units. Report of improvement was provided for site's further improvement. | Complied |
| Have there been any stakeholder (including NGO) consultation conducted?   | Yes. Stakeholders including NGO were consulted in the uncertified units.  | Complied |

### 3.3 Progress of scheme smallholders and/or outgrowers

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards   |                |            |
|--|----------------|------------|
| Requirement  | Remarks        | Compliance |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?<br><br>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years. | Not applicable | N/A        |

### 3.4 Details of Nonconformities

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

During this Assessment there were one (1) Critical (Major), four (4) Minor nonconformities and two (2) OFI Opportunity For Improvement raised. The Diamond Jubilee Palm Oil Mill (SOU 18) Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

| Non-conformity                     |  |  |   |
|------------------------------------|--|--|---|
| <b>NCR Ref #</b>                   | 1927569-202007-M1  | <b>Clause &amp; Category (Major / Minor)</b> | RSPO P&C MYNI 2019 Indicator 3.6.1 (Critical/Major) |
| <b>Date Issued</b>                 | 10/7/2020  | <b>Due Date</b>                              | 8/10/2020   |
| <b>Closed (Yes / No)</b>           | Yes  | <b>Date of nonconformity Closure</b>         | 18/9/2020   |
| <b>Statement of Nonconformity:</b> | Risk assessment conducted were not covered all risk at the workstation   |  |   |
| <b>Requirement Reference:</b>      | All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.   |  |   |
| <b>Objective Evidence:</b>         | <p>Welch Estate</p> <p>Noted during HIRARC review, the risk assessment for loading ramp were not covered all risk at the workstation. The current assessment only covered on the risk for moving vehicle and FFB loading into the ramp. The risk for ramp attendant working at the station was not covered in the HIRARC report.</p> <p>Diamond Jubilee Estate</p> <p>Noted during HIRARC review, the risk assessment for FFB evacuation were not covered all risk at the workstation. The current assessment only covered on the risk for moving vehicle and FFB loading into the BIN. The risk for ramp attendant/FFB loader working at the station was not covered in the HIRARC report.</p> <p>Sighted during site visit at the nursery, sighted one of the the water pump belting which coupled the Diesel Engine and the Water Pump at the Oil Palm Nursey was not fully guarded to provide protection during operation. Noted during HIRARC review, the guard for belting were not identified in the existing control for pump house operation.</p> |  |   |
| <b>Corrections:</b>                | <p>Welch and Diamond Jubilee Estate:</p> <p>Risk assessment for ramp workers and bin attendant have been added in HIRARC. The HIRARC for water pump have been revised, to include machine guarding in control measures.</p> <p>Diamond Jubilee Estate:</p> <p>New cover was fixed to the secondary belting</p>   |  |   |
| <b>Root Cause Analysis:</b>        | <p>Welch and Diamond Jubilee Estate:</p> <p>The earlier risk assessment did not cover for ramp worker and bin attendant.</p> <p>Diamond Jubilee Estate:</p> <p>Guarding was fixed only fixed at main belting</p>   |  |   |
| <b>Corrective Actions:</b>         | <p>Welch and Diamond Jubilee Estate:</p> <p>HIRARC review for ramp attendance will be done yearly by ESH committee.</p>  |  |   |



**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|-------------------------------|---|
|                               | <p>Diamond Jubilee Estate:<br/>To include inspection on belting cover during workplace inspection by ESH committee.</p>   |
| <b>Assessment Conclusion:</b> | <p>Major NC close out verification:<br/>Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> <li>- Water pump motor guarding installation photo dated 25/8/2020 and updated HIRARC register by Diamond Jubilee Estate</li> <li>- Documented SOP for ramp operator and bin attendant including training of SOP to the relevant workers dated on 22/7/2020 by Diamond Jubilee Estate</li> <li>- Revised HIRARC register and HIRARC review summary dated on 8/7/2020 by Welch Estate</li> <li>- Documented SOP for ramp operator and bin attendant including training of SOP to the relevant workers dated on 9/7/2020 by Welch Estate</li> </ul> <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 18/9/2020. Continuous implementation will be further verified in the next audit.</p> |

| Non-conformity                     |  |  |  |
|------------------------------------|--|--|--|
| <b>NCR Ref #</b>                   | 1927569-202007-N1  | <b>Clause &amp; Category (Major / Minor)</b> | RSPO P&C MYNI 2019 Indicator 6.7.2 (Minor) |
| <b>Date Issued</b>                 | 10/7/2020  | <b>Due Date</b>                              | 9/7/2021                                   |
| <b>Closed (Yes / No)</b>           | No   | <b>Date of nonconformity Closure</b>         | N/A  |
| <b>Statement of Nonconformity:</b> | Implementation of emergency procedures were not fully effective.   |  |  |
| <b>Requirement Reference:</b>      | Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.  |  |  |
| <b>Objective Evidence:</b>         | <p>Diamond Jubilee Palm Oil Mill:<br/>Sighted 2 expired items i.e. Analgesic cream expired on 7/6/19 &amp; Antiseptic cream expired on 1/7/20 in the First Aid Kit No. 5 sampled near the Workshop Area. Further verification indicates the monthly inspection record for First Aid Kit No. 5 does not capture on the expired items details.</p> <p>Diamond Jubilee Estate:<br/>a) Sighted 2 expired elastic bandages dated 30/03/20 &amp; 30/06/20 kept in the Manuring Mandor's First Aid Kit. Further verification indicates the monthly inspection record for Manuring Mandor First Aid Kit does not capture on the expired items details.</p> |  |  |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|-------------------------------|--|
|                               | <p>b) Emergency eye wash located at the pesticide mixing area was tested malfunction.</p> <p>Bukit Asahan Estate:<br/>Pesticide mixing area emergency eye wash water in the bottle was found contaminated with unknown substances.</p>   |
| <b>Corrections:</b>           | <p>Diamond Jubilee Estate and POM:<br/>New elastic bandage, analgesic cream and antiseptic cream have been replaced.</p> <p>Diamond Jubilee Estate:<br/>The pull lever for emergency eye wash was repaired by Foreman.</p> <p>Bukit Asahan Estate:<br/>Clean water replacement for portable emergency eyewash.</p>   |
| <b>Root Cause Analysis:</b>   | <p>Diamond Jubilee Estate and POM:<br/>No checking on expiry date for first aid items.</p> <p>Diamond Jubilee Estate:<br/>The pull lever for emergency eye wash was rusted.</p> <p>Bukit Asahan Estate:<br/>The portable emergency eye wash was not properly maintained and checked regularly.</p>   |
| <b>Corrective Actions:</b>    | <p>Diamond Jubilee Estate and POM:<br/>Estate Medical Assistant will conduct monthly inspection for all first aids box<br/>Mill management appointed QA to check first aids box on monthly basis.</p> <p>Diamond Jubilee Estate:<br/>To include checking on emergency shower and eye wash in workplace inspection.</p> <p>Bukit Asahan Estate:<br/>To include checking and replacement of water for the portable emergency eye wash monthly.</p> |
| <b>Assessment Conclusion:</b> | <p>The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.</p>   |

| Non-conformity   |                   |                              |  |
|------------------|-------------------|------------------------------|--|
| <b>NCR Ref #</b> | 1927569-202007-N2 | <b>Clause &amp; Category</b> | RSPO P&C MYNI 2019 Indicator 6.7.5 (Minor) |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|                                    |   |                                      |          |
|------------------------------------|---|--------------------------------------|----------|
|                                    |   | <b>(Major / Minor)</b>               |          |
| <b>Date Issued</b>                 | 10/7/2020   | <b>Due Date</b>                      | 9/7/2021 |
| <b>Closed (Yes / No)</b>           | No  | <b>Date of nonconformity Closure</b> | N/A      |
| <b>Statement of Nonconformity:</b> | Occupational injuries summary recording via JKPP 8 form submission to DOSH was not evident for year ending 2019.  |                                      |          |
| <b>Requirement Reference:</b>      | Occupational injuries are recorded using Lost Time Accident (LTA) metrics.  |                                      |          |
| <b>Objective Evidence:</b>         | Welch Estate:<br>No evidence available on the completed JKPP 8 form for year ending 2019 has been submitted to DOSH.  |                                      |          |
| <b>Corrections:</b>                | All accident report have been retrieved from previous email to GSQM ESH. JKPP 8 submitted to DOSH on 17th July 2020.  |                                      |          |
| <b>Root Cause Analysis:</b>        | Accident reports has been misplaced since the former Person in Charge left the Company.   |                                      |          |
| <b>Corrective Actions:</b>         | New person-in-charge was nominated for online submission of accident report to state DOSH.  |                                      |          |
| <b>Assessment Conclusion:</b>      | The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment. |                                      |          |

| <b>Non-conformity</b>              |   |  |  |
|------------------------------------|---|--|--|
| <b>NCR Ref #</b>                   | 1927569-202007-N3   | <b>Clause &amp; Category (Major / Minor)</b> | RSPO P&C MYNI 2019 Indicator 7.3.2 (Minor) |
| <b>Date Issued</b>                 | 10/7/2020   | <b>Due Date</b>                              | 9/7/2021                                   |
| <b>Closed (Yes / No)</b>           | No  | <b>Date of nonconformity Closure</b>         | N/A  |
| <b>Statement of Nonconformity:</b> | Disposal of waste material was not fully effective according to procedures.   |  |  |
| <b>Requirement Reference:</b>      | Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.  |  |  |
| <b>Objective Evidence:</b>         | <p>Diamond Jubilee POM:<br/>Empty grease drum and several empty oil paint containers were dumped together with the scrap metals at the Scrap Metal Yard. This indicates mixture of schedule waste items with metal scraps.</p> <p>Bukit Asahan Estate:<br/>i) Refrigerator was dumped into the newly opened landfill pit besides the closed landfill pit dated 6/07/20.</p> |  |  |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|                               | ii) Empty Diesel Drum (3 drums) were found improperly placed near the replanting field No. 2020B.   |
| <b>Corrections:</b>           | <p>Diamond Jubilee POM:<br/>Grease drums and empty paint containers are collected and stored in SW store</p> <p>Bukit Asahan estate:<br/>i) Immediately collect removed the used discarded refrigerator form from the landfill.<br/>ii) Diesel drum have been collected by the contractor.</p>                                      |
| <b>Root Cause Analysis:</b>   | <p>Diamond Jubilee POM and Bk Asahan Est:<br/>No briefing conducted to worker on waste disposal.</p> <p>Bk Asahan est:<br/>Temporary storage of diesel in the field by the contractor</p>   |
| <b>Corrective Actions:</b>    | <p>Diamond Jubilee POM:<br/>To identify grease drums and paint containers in Environmental Management Plan.<br/>To educate workers on disposal of waste.</p> <p>Bukit Asahan estate:<br/>i) To educate rubbish collector and employees on domestic waste disposal.<br/>ii) To have dedicated area for contractor's diesel drum.</p> |
| <b>Assessment Conclusion:</b> | The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.   |

| Non-conformity                     |   |  |  |
|------------------------------------|---|--|--|
| <b>NCR Ref #</b>                   | 1927569-202007-N4   | <b>Clause &amp; Category (Major / Minor)</b> | RSPO P&C MYNI 2019 Indicator 7.8.1 (Minor) |
| <b>Date Issued</b>                 | 10/7/2020   | <b>Due Date</b>                              | 9/7/2021                                   |
| <b>Closed (Yes / No)</b>           | No  | <b>Date of nonconformity Closure</b>         | N/A  |
| <b>Statement of Nonconformity:</b> | Water Management Plan was not effectively implemented.  |  |  |
| <b>Requirement Reference:</b>      | <p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> |  |  |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|-------------------------------|---|
| <b>Objective Evidence:</b>    | Bukit Asahan Estate:<br>Buffer zone "Sungai Asahan" riverbank was not adequately maintained as per the water management plan. The following lapses were identified:<br>a) Soil erosion was noticed near the river bank Field No. 2019A<br>b) Debris from loose fruit sieve was improperly placed near the river bank. |
| <b>Corrections:</b>           | a) To Plant <i>Mucuna bracteata</i> near the river bank.<br>b) Debris was collected and applied at frond stacking   |
| <b>Root Cause Analysis:</b>   | a) Soil erosion due to heavy rain and flash flood<br>b) No briefing conducted to the workers on the disposal of loose fruit debris  |
| <b>Corrective Actions:</b>    | a) Monitoring of buffer zone to be included during HCV area monitoring<br>b) To educate workers on debris disposal  |
| <b>Assessment Conclusion:</b> | The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.                           |

| Opportunity for Improvements |  |
|------------------------------|--|
| OFI #                        | Description  |
| 1927569-202007-I1            | 3.7.3:<br>Diamond Jubilee Palm Oil Mill: The training frequency can be enhance and cover more personnel involve in the implementation of the Supply Chain Certification Standard (SCCS)  |
| 1927569-202007-I2            | 6.2.3:<br>- Diamond Jubilee Palm Oil Mill: Interview session with the female weighbridge operator found that sometimes she needs to stay late to wait for FFB received which might exceed nightshift hours<br>- Diamond Jubilee Estate: Salary deduction for electricity shown as "other loan/employees deduction" in the workers' payslip |

| Positive Findings |   |
|-------------------|---|
| PF #              | Description   |
| PF 1              | Good continuous improvement program implementation                |
| PF 2              | Good social contributions as per external stakeholders' feedbacks |
| PF 3              | Good documents retrieval  |

**3.4.1 Status of Nonconformities Previously Identified and Observations**

| Non-conformity                     |   |  |   |
|------------------------------------|---|--|---|
| <b>NCR Ref #</b>                   | 1810910-201906-M1   | <b>Clause &amp; Category (Major / Minor)</b> | RSPO SCCS 5.4.1 (Major)<br>New indicator: 3.8.12 (Critical) |
| <b>Closed (Yes / No)</b>           | Yes   | <b>Date of nonconformity Closure</b>         | 06/11/2019  |
| <b>Statement of Nonconformity:</b> | The information on the documents from the other certified estate (crop diversion) was not complete.   |  |   |
| <b>Requirement Reference:</b>      | <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul> |  |   |
| <b>Objective Evidence:</b>         | <p>The certificate number was not stated on the weighbridge ticket/despatch note for the following:</p> <ol style="list-style-type: none"> <li>1) Supplier: E128-E-Welch Estate<br/>Product: 0001-FFB A Crop<br/>DO # 1104<br/>Date delivered: 19/5/2019<br/>Net Weight: 14,580 kg<br/>FFB received (weighbridge) ticket #106142<br/>SOU: 19<br/>Certificate No: not stated on the ticket</li> <li>2) Supplier: E024-E-Kempas<br/>Product: 0001-FFB A Crop<br/>DO # 181230<br/>Date delivered: 22/5/19<br/>Net Weight: 15,480 kg<br/>FFB received (weighbridge) ticket # 106275<br/>SOU: 17<br/>Certificate No: Not stated on the ticket</li> <li>3) Supplier: E138-E-Pertang<br/>Product: 0001-FFB A Crop<br/>DO # 6210<br/>Date delivered: 5/7/2019<br/>Net Weight: 19,040 kg</li> </ol>  |  |   |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|                               |  |
|-------------------------------|--|
|                               | FFB received (weighbridge) ticket # 107699<br>SOU: 16<br>Certificate No: Not stated on the ticket  |
| <b>Correction/containment</b> | Manual stamping to be used while awaiting the system update  |
| <b>Cause</b>                  | The SIME WEIGH system at was not updated due to outdated certificate details   |
| <b>Corrective Actions:</b>    | PSQM Dept. to liaise with IT Department to update the system for estate facilitate with the weighbridge  |
| <b>Assessment Conclusion:</b> | <p>Verified evidence (off-site):</p> <ul style="list-style-type: none"> <li>- Manual stamping of weighbridge tickets for group FFB received for sample tickets of Kempas Estate; Weighbridge ticket # 21969; Date: 1/8/2019; Parent mill RSPO certificate # RSPO –PC 00101 and 2 others (Pertang Estate; Cert. # MUTU-RSPO/093 &amp; Welch Estate; Cert. # RSPO 600305)</li> <li>- Email by PSQM to IT Department on weighbridge system issue - to be update during schedule visit</li> </ul> <p>The Major NC was closed on 8/11/2019.</p> <p>ASA 1_4 verification:<br/>Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Major NC remained closed.</p> |

| Non-conformity                     |  |  |   |
|------------------------------------|--|--|---|
| <b>NCR Ref #</b>                   | 1810910-201906-N1  | <b>Clause &amp; Category (Major / Minor)</b> | RSPO P&C MYNI 2014 Indicator 4.7.3 (Minor)<br>New indicator: 6.7.3 (Critical) |
| <b>Closed (Yes / No)</b>           | Yes  | <b>Date of nonconformity Closure</b>         | 10/07/2020  |
| <b>Statement of Nonconformity:</b> | The guarding equipment at the oil palm nursery was not fully implemented.  |  |   |
| <b>Requirement Reference:</b>      | 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. |  |   |
| <b>Objective Evidence:</b>         | Diamond Jubilee Estate:<br>During site visit at nursery, it was found that the belting which coupled the Diesel Engine and the Water Pump at the Oil Palm Nursey was not fully guarded to provide protection during operation.                                       |  |   |
| <b>Correction/containment</b>      | New guarding installed by the Foreman  |  |   |
| <b>Cause</b>                       | The guarding was worn out and removed during the maintenance work  |  |   |
| <b>Corrective Actions:</b>         | To include guarding inspection for nursery water pump in workplace inspection checklist (WPI)  |  |   |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|                               |  |
|-------------------------------|--|
| <b>Assessment Conclusion:</b> | ASA 1_4 verification:<br>Minor NC has been closed on 10/7/2020. However, a finding has been raised for a similar issue but fall under different indicator as per Major NC 1 above. |
|-------------------------------|--|

| Opportunity for Improvement |             |
|-----------------------------|-------------|
| OFI#                        | Description |
| OFI 1                       | -Nil-       |

**3.4.2 Summary of the Nonconformities and Status**

| CAR Ref.          | Category (Major / Minor) | P&C Indicator | Issued Date | Status & Date (Closure)  |
|-------------------|--------------------------|---------------|-------------|--------------------------|
| 1358112M1         | Major                    | 6.5.2         | 22/7/2016   | Closed out on 05/08/2016 |
| 1358112N1         | Minor                    | 2.1.2         | 22/7/2016   | Closed out on 12/7/2017  |
| 1358112N2         | Minor                    | 4.7.6         | 22/7/2016   | Closed out on 12/7/2017  |
| 1358112N3         | Minor                    | 6.10.3        | 22/7/2016   | Closed out on 12/7/2017  |
| 1501387-201707-N1 | Minor                    | 4.6.10        | 12/7/2017   | Closed out on 07/09/2018 |
| 1501387-201707-N2 | Minor                    | 5.3.3         | 12/7/2017   | Closed out on 07/09/2018 |
| 1678718-201806-N1 | Minor                    | 6.9.3         | 7/09/2018   | Closed out on 09/08/2019 |
| 1678718-201806-N2 | Minor                    | 5.1.3         | 7/09/2018   | Closed out on 09/08/2019 |
| 1810910-201906-M1 | Major                    | SCCS 5.4.1    | 09/08/2019  | Closed out on 06/11/2019 |
| 1810910-201906-N1 | Minor                    | 4.7.3         | 09/08/2019  | Closed out on 10/7/2020  |
| 1927569-202007-M1 | Critical/Major           | 3.6.1         | 10/7/2020   | Closed out on 18/9/2020  |
| 1927569-202007-N1 | Minor                    | 6.7.2         | 10/7/2020   | "Open"                   |
| 1927569-202007-N2 | Minor                    | 6.7.5         | 10/7/2020   | "Open"                   |
| 1927569-202007-N3 | Minor                    | 7.3.2         | 10/7/2020   | "Open"                   |
| 1927569-202007-N4 | Minor                    | 7.8.1         | 10/7/2020   | "Open"                   |

**3.5 Stakeholders and previous land owner / user consultation**

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Diamond Jubilee Palm Oil Mill and Supply Base Certification Unit’s environmental and social performance, legal and any known dispute issues.

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



**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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 below.

| <b>List of Stakeholders contacted</b>  |   |
|--|---|
| <b>Internal Stakeholders</b><br>General workers<br>Mill operators<br>Harvesters<br>Sprayers<br>Gender committee representative | <b>Local communities/Union/Contractors</b><br>Head of Village-Kampung Bukit Keledang<br>Pengerusi JPKK FELDA Bukit Senggeh<br>Kampung Chabau representative<br>Mill vendors (contractors & suppliers)<br>Estate & mill vendors (contractors & suppliers)<br>Welch Estate NUPW representatives<br>Diamond Jubilee Palm Oil Mill NUPW representatives |
| <b>Government Departments</b><br>Majlis Perbandaran Jasin<br>SK Ladang Welch<br>SJK(T) Ladang Diamond Jubile                   | <b>NGO</b><br>Nil   |

| <b>Stakeholders comment</b> |  |
|-----------------------------|--|
| <b>1</b>                    | <b>Feedbacks:</b> <u>Majlis Perbandaran Jasin</u><br>They have received the contribution of face mask and hand sanitizers from Sime Darby management during COVID 19 pandemic. Overall, Sime Darby management has given full support to Majlis Perbandaran Jasin. The current issues are regarding wild dogs and cows reported and in progress for solution.<br><b>Management Responses:</b> Noted on the information.<br><b>Audit Team Findings:</b> No other issue.  |
| <b>2</b>                    | <b>Feedbacks:</b> <u>Head mistress, SJK (T) Ladang Diamond Jubilee &amp; SK Ladang Welch</u><br>The school management would like to extend their appreciation for the contribution and donations that Sime Darby management given such as monthly milk powder, water bill, grass-cutting and building maintenance services, etc. Only 4 students from Diamond Jubilee POM while the 66 students are from outside the estate area.<br><b>Management Responses:</b> Noted on the information.<br><b>Audit Team Findings:</b> No other issue. |
| <b>3</b>                    | <b>Feedbacks:</b> <u>Vendors(Temis (M) Sdn Bhd &amp; Kejuruteraan WH)</u>  |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |  |
|---|--|
|   | <p>Agreement between Sime Darby and contractors were signed and verified during the audit. No complaint for the management. The payment paid within 1 month as agreed. Contractors were being trained and briefed regarding RSPO &amp; MSPO.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No other issue.</p>  |
| 4 | <p><b>Feedbacks:</b> <u>Local communities (Pengerusi JPKK Felda Bukit Senggeh, Ketua Kampung Bukit Keledang, Wakil Kampung Chabau)</u></p> <ul style="list-style-type: none"> <li>- This is the first time for Felda Bukit Senggeh invited to Sime Darby Diamond Jubilee unit. Hope to get invited more in future. The location of Felda is just adjacent to the Diamond Jubilee Estate's border. No encroachment or dispute case so far.</li> <li>- Kampung Bukit Keledang hope that Sime Darby can offer more interesting package for works to local people.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- Will invite Felda Bukit Senggeh for stakeholder invitation in future.</li> <li>- Estate will share the benefits for working in estate in the next stakeholder meeting next year</li> </ul> <p><b>Audit Team Findings:</b> No other issue.</p> |
| 5 | <p><b>Feedbacks:</b> <u>NUPW Representatives (Diamond Jubilee POM &amp; Welch Estate)</u></p> <p>The election for NUPW were made through vote. Most of the employee joined NUPW and no restriction from the company. No serious complaint from the workers, mainly for the housing maintenance.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No other issue.</p>   |
| 6 | <p><b>Feedbacks:</b> <u>Foreign Workers (Diamond Jubilee POM, Diamond Jubilee Estate &amp; Welch Estate)</u></p> <p>Housing were provided free with subside of 35 gallons of clean water. There is retention bonus given to the long-time service workers. Employee can keep their own passport or keep in office. No discrimination practiced.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No other issue.</p>   |
| 7 | <p><b>Feedbacks:</b> <u>Gender Committee (Diamond Jubilee POM, Diamond Jubilee Estate &amp; Welch Estate)</u></p> <p>No case of sexual harassment reported in the certification unit. New mothers in the certification units were assessed on their needs and no restriction to have a breastfeeding time, check-up session, etc. the gender committee meeting was conducted regularly with active participation and activities among the female employees.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No other issue.</p>   |

| List of land owner / user contacted |                           |                |                      |                                 |  |
|-------------------------------------|---------------------------|----------------|----------------------|---------------------------------|--|
| Name                                | Years of ownership / used | Land area (ha) | Agreement (Yes / No) | Agreement base on FPIC (Yes/No) | Compliance on the agreement terms and conditions |
|                                     |                           |                |                      |                                 |  |


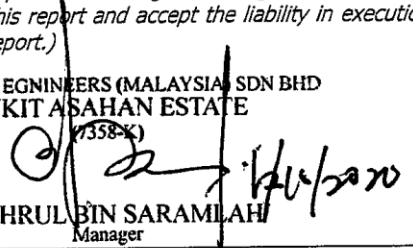
**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |         |          |     |     |   |
|---|---------|----------|-----|-----|---|
| China Engineers (Malaysia) Sdn. Bhd. (Sime Darby Plantation Berhad) | Current | 7,356.20 | n/a | n/a | All estates within Diamond Jubilee SOU are the original Sime Darby Plantation estates since establishment in 1990s. |
|---|---------|----------|-----|-----|---|

| Previous land owner / user comment |                                  |
|------------------------------------|----------------------------------|
| Nil                                | <b>Feedbacks:</b> N/A            |
|                                    | <b>Management Responses:</b> N/A |
|                                    | <b>Audit Team Findings:</b> N/A  |

**3.6 Impartiality and conflict of interest**

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team consist of Hafriazhar Mohd. Mokhtar as Audit Team Leader, Muhammad Fadzli Masran and Ragu Samy Erulappan as Audit Team Members.

| Formal Signing-off of Assessment Conclusion and Recommendation   |  |
|--|--|
| The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Diamond Jubilee Palm Oil Mill and Supply Base has complied with the RSPO P&C MYNI 2019, RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Diamond Jubilee Palm Oil Mill and Supply Base is continued. |  |
| Report prepared by   | Acceptance of Assessment Conclusion  |
| <b>Name:</b><br>Hafriazhar Mohd. Mokhtar   | <b>Name:</b><br>Syahrul Bin Saramlah   |
| <b>Company Name:</b><br>BSI Services Malaysia Sdn. Bhd.  | <b>Company Name:</b><br>The China Engineers (Malaysia)S/B  |
| <b>Title:</b><br>Lead Auditor  | <b>Title:</b>  |
| <b>Signature:</b><br>   | <b>Signature:</b><br><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i><br><br>THE CHINA ENGINEERS (MALAYSIA) SDN BHD<br>BUKIT ASAHAN ESTATE<br>(7358-K)<br>SYAHRUL BIN SARAMLAH<br>Manager |
| <b>Date:</b> 23/9/2020   | <b>Date:</b> 1/10/2020   |

**Appendix A: Summary of Findings**

| Criterion / Indicator   |   | Assessment Findings  | Compliance |
|---|---|--|------------|
| <p><b>Principle 1: Behave ethically and transparently</b><br/>           Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>   |   |  |            |
| <p><b>Criteria 1.1</b><br/>           The unit of certification provides 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.</p> |   |  |            |
| 1.1.1   | (C) Documents that are specified in the RSPO P&C are made available to the public.        | Documents required for all unit of certification available in SOU 18 Certification Unit: <ul style="list-style-type: none"> <li>• Land titles/user rights</li> <li>• Occupational health and safety plans</li> <li>• Plans and impact assessments relating to environmental and social impacts</li> <li>• HCV documentation</li> <li>• Pollution prevention and reduction plans</li> <li>• Details of complaints and grievances</li> <li>• Continuous improvement plans</li> <li>• Public summary of certification assessment report</li> <li>• Group Sustainability Policy</li> <li>• Record of contributions to community development</li> </ul> | Complied   |
| 1.1.2   | Information is provided in appropriate languages and accessible to relevant stakeholders. | SOU 18 has conducted meeting with the stakeholder to share any new information on RSPO certification, environmental, social, safety and legal requirement applied to all operating units. Some stakeholders raised some issue and discussed with the management during the meeting. Sighted the latest minutes meeting for Diamond Jubilee Estate combined with Diamond Jubilee Mill conducted consultation meeting on 3/7/2020 at Diamond Jubilee Estate Clubhouse. Previous meeting was done on  | Complied   |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |   |   |          |
|-------|---|---|----------|
|       |   | 12/7/2019. Internal stakeholder meeting for DJPOM conducted on during mill Workers Union meeting Diamond Jubilee POM date: 3/8/2019   |          |
| 1.1.3 | <b>(C)</b> Records of requests for information and responses are maintained.  | <p>DJPOM maintained records of request for information and responses as per sample sighted as following:</p> <ol style="list-style-type: none"> <li>1. MPOB inspection visit records; Inspection form # 000047913; Date: 1/10/2019</li> <li>2. DOSH inspection visits records; 1<sup>st</sup> Inspection 1-unit boiler &amp; 2 units UPV; Date: 29/6/2020</li> <li>3. DOE field citation records; Ref. # JAS/ATOP1/08/2015; Date: 10/3/2020</li> </ol> <p>Records maintained in estates visited as per sample as following:</p> <ul style="list-style-type: none"> <li>- Welch Estate: DOSH inspection visit book which sighted for latest visit conducted on 14/1/2020 for inspection on 1 unit of Air Receiver Tank; PMT # JH PMT 22626.</li> <li>- Bukit Asahan Estate: Feedback/complaints (housing) by workers records</li> </ul>  | Complied |
| 1.1.4 | <b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official. | <p>The Mill Quality Management System Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</p> <p>This has been communicated to workers and stakeholders through:</p> <ol style="list-style-type: none"> <li>1. Stakeholder meeting conducted on 12/7/2019 at Diamond Jubilee Estate Clubhouse</li> <li>2. Muster briefing conducted to workers on 02/01/2019.</li> </ol> <p>The person in charge for communication and consultation is Hanif Ab. Talib (AM Diamond Jubilee POM) as per appointment letter dated 1/1/2020.</p> <ol style="list-style-type: none"> <li>3. Person in charge for Welch Estate is Muhammad Imran Bin Jamaludin as per letter dated 1/7/2019. Latest communication was done on 2/7/2020 with</li> </ol> | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |  | external stakeholders which also attended by workers union representatives. Bukit Asahan Stakeholder Meeting done on 26/6/2020 as per minutes of meeting # 06/2020. Appointed social related issues person in-charge in Bukit Asahan Estate is Kassim bin Kato asper letter dated 10/1/2020.   |             |          |      |                     |          |   |            |   |           |   |              |            |   |                   |   |          |
|---|--|--|-------------|----------|------|---------------------|----------|---|------------|---|-----------|---|--------------|------------|---|-------------------|---|----------|
| 1.1.5   | There is a current list of contact and details of stakeholders and their nominated representatives.  | <p>The latest Stakeholders List as at July 2020 sighted available. Stakeholders' details available included person in charge, address, e-mail and contact number as per sample as following:</p> <table border="1"> <thead> <tr> <th>Mill/Estate</th> <th>Category</th> <th>Name</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Diamond Jubilee POM</td> <td>Supplier</td> <td>- ABC Hardware &amp; Stationery Trading<br/>- Segamat Engineering Hardware Sdn. Bhd.</td> </tr> <tr> <td>Contractor</td> <td>- Temis (M) Sdn. Bhd.<br/>- MHN B Reka Sdn. Bhd.</td> </tr> <tr> <td>Authority</td> <td>- Badan Kawal Selia Air Melaka<br/>- Balai Polis Jasin</td> </tr> <tr> <td rowspan="2">Welch Estate</td> <td>Contractor</td> <td>- Greenvision Trading &amp; Services Sdn. Bhd.<br/>- Hayati Enterprise Sdn. Bhd.</td> </tr> <tr> <td>Local communities</td> <td>- Kampung Bukit Kledang<br/>- Kampung Kenangan</td> </tr> </tbody> </table> | Mill/Estate | Category | Name | Diamond Jubilee POM | Supplier | - ABC Hardware & Stationery Trading<br>- Segamat Engineering Hardware Sdn. Bhd. | Contractor | - Temis (M) Sdn. Bhd.<br>- MHN B Reka Sdn. Bhd. | Authority | - Badan Kawal Selia Air Melaka<br>- Balai Polis Jasin | Welch Estate | Contractor | - Greenvision Trading & Services Sdn. Bhd.<br>- Hayati Enterprise Sdn. Bhd. | Local communities | - Kampung Bukit Kledang<br>- Kampung Kenangan | Complied |
| Mill/Estate   | Category   | Name   |             |          |      |                     |          |   |            |   |           |   |              |            |   |                   |   |          |
| Diamond Jubilee POM   | Supplier   | - ABC Hardware & Stationery Trading<br>- Segamat Engineering Hardware Sdn. Bhd.  |             |          |      |                     |          |   |            |   |           |   |              |            |   |                   |   |          |
|   | Contractor   | - Temis (M) Sdn. Bhd.<br>- MHN B Reka Sdn. Bhd.  |             |          |      |                     |          |   |            |   |           |   |              |            |   |                   |   |          |
|   | Authority  | - Badan Kawal Selia Air Melaka<br>- Balai Polis Jasin  |             |          |      |                     |          |   |            |   |           |   |              |            |   |                   |   |          |
| Welch Estate  | Contractor   | - Greenvision Trading & Services Sdn. Bhd.<br>- Hayati Enterprise Sdn. Bhd.  |             |          |      |                     |          |   |            |   |           |   |              |            |   |                   |   |          |
|   | Local communities  | - Kampung Bukit Kledang<br>- Kampung Kenangan  |             |          |      |                     |          |   |            |   |           |   |              |            |   |                   |   |          |
| <p><b>Criteria 1.2</b><br/>           The unit of certification commits to ethical conduct in all business operations and transactions.</p> |  |  |             |          |      |                     |          |   |            |   |           |   |              |            |   |                   |   |          |
| 1.2.1   | A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. | <p>DJPOM has implemented policy on code of ethical conduct and integrity (Code of Business Conduct - COBC) which covered all operations in the plantation operation. Briefing session was given to all workers at visited operating units. For example, DJPOM briefing of policies were given to the workers on 6/7/2020, Welch Estate on 2/5/2019 and Diamond Jubilee Estate on 1/7/2020.</p> <p>For labour agent and contractors, Sime Darby has applied its Vendor COBC (30 May 2018), It includes the Fair Business practices-ensuring that we promote fair</p>  | Complied    |          |      |                     |          |   |            |   |           |   |              |            |   |                   |   |          |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|  |  |   |          |
|--|--|---|----------|
|  |  | business practices and compete in an ethical manner, labour & human rights, ethics & management practices.<br>The Vendor Integrity Pledge sighted available for sampled DJPOM vendor Temis (M) Sdn. Bhd.; Contract Date: 23/3/2020. Documents also available in Diamond Jubilee Estate for sampled contractor Sri Yogaletchumi Kali Enterprise; Contract date: 1/10/2019.   |          |
| 1.2.2  | A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. | Monitoring included inspection visit by mill advisors as well as internal audit conducted. Latest Mill Advisor inspection visit to DJPOM was conducted on 21-23/10/2020 as per report ref. # SOU 18/DJM/02/2019. Internal audit for DJPOM was conducted on 8-19/6/2020 by Regional SQM internal auditors for SOU 18. Last PA visit to Welch Estate was conducted on 16-18/11/2015 as per report ref. # SOU19/WE/01/15-16. Since then, PA visit was conducted only for selected estates only. For Diamond Jubilee Estate, last PA visit was conducted on 7-9/8/2019.   | Complied |
| <b>Principle 2: Operate legally and respect rights</b>   |  |   |          |
| Implement legal requirements as the basic principles of operation in any jurisdiction.                   |  |   |          |
| <b>Criteria 2.1:</b>   |  |   |          |
| There is compliance with all applicable local, national and ratified international laws and regulations. |  |   |          |
| 2.1.1  | <b>(C)</b> The unit of certification complies with applicable legal requirements.                                      | SOU 18 had continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. SOU 18 had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were:<br><u>Diamond Jubilee POM:</u><br>a) "Majlis Perbandaran" Jasin License No. L-0007430-05 valid until 31/12/2020.<br>b) MPOB License No. 500288804000, License Activity issued for i) "Menjual dan Mengalih" FFB, PK, CPO, SPO# ii) "Membeli dan mengalih" FFB#, iii) "Menyimpan" PK, CPO, SPO# iv) "Mengilang" FFB#. License valid for 1 year from 01/10/19 until 30/09/2020 with allowable total FFB processed of 192000mt/per year. | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|  |  | <p>c) DOE License No. 004043 for "Menduduki Atau Menggunakan Premis Yang Ditetapkan" valid until 30/06/21.</p> <p>d) "Lesen Abstraksi Air Laut, Sungai dan Lain-Lain Sumber Air" S/N: BKSAM 0597 valid until 31/10/2020.</p> <p>e) "Permit had kerja lebih masa di bawah seksyen 60A(4)(a) Akta Kerja1955; Ref. # BHG.PU9/134 JLD 9(11); Tarikh: 27/3/2017"</p> <p>f) "Permit potongan bagi tujuan pembayaran bil elektrik; Ref. # BH.PU/9/129 JLD 33(53); Tarikh: 6/7/2017; &lt;50%"</p> <p><u>Welch Estate:</u></p> <p>a) Air Receiver Tank Certificate of Fitness, Registration No. JH PMT 22626 valid until 4/01/2021</p> <p>b) Diesel &amp; Petrol Storage Permit, S/N P: J000125, Diesel Quantity: 5460 Litre, Petrol Quantity: 270 Litre, permit valid until 30/7/20</p> <p>c) MPOB license No.: 522499002000 issued for "Menjual dan mengalih" valid until 31/07/20</p> <p><u>Diamond Jubilee Estate:</u></p> <p>a) "Lesen Menyimpan Diesel/Petrol/Minyak Tanah &lt;15000L, License No. L-0000438-08 valid until 31/12/2020.</p> <p>b) MPOB License No. 522967002000 for "Menjual dan Mengalih" FFB# valid until 31/08/2020.</p> <p>c) Lesen Abstraksi Air Laut, Sungai Dan Lain- Lain Sumber Air, S/N: BKSAM 0670, valid until 31/12/2020.</p> <p>d) Certificate of Fitness for Air Receiver valid until 22/01/21</p> <p>e) Diesel &amp; Petrol Storage Permit, S/N P: M000216, Diesel Quantity: 34000 Litre, permit valid until 24/10/20</p> |  |
|--|--|--|--|



**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|              |  |   |                 |
|--------------|--|---|-----------------|
|              |  | <p><u>Bukit Asahan Estate:</u><br/> a) License Air receiver, MK PMT 4942, validity until 26/02/21<br/> b) License Air receiver, MK PMT 64001, validity until 14/08/2020<br/> c) MPOB license, License no: 52761-500-2000, validity until 28/02/21</p>   |                 |
| <p>2.1.2</p> | <p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and regulations.</p> | <p>SOU18 had documented the Legal &amp; Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. The Legal Register includes Occupational Safety and Health Act 1994, Fire Services Act 1988, Pesticide Act 1974, Environmental Quality Act 1974, Factories and Machinery (Noise Exposure) (Revocation) 2019, Occupational Safety and Health (Noise Exposure) Regulations 2019 and other related legal requirements. Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. Evaluation of the legal requirements and compliance status with legal requirement are monitored by the operating units on yearly basis. Details of latest legal compliance review date done were as follows:<br/> Diamond Jubilee POM – Latest legal compliance review was done on 30/06/2020.<br/> Bukit Asahan Estate - Latest legal compliance review was done on 2/3/2020.<br/> Welch Estate – Latest review was done on 1/06/2020.<br/> Diamond Jubilee – Latest review was done on 22/06/2020.<br/> 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.<br/> Latest changes made on 9/06/2020 related to the following Orders:</p> | <p>Complied</p> |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |   |   |          |
|---|---|---|----------|
|   |   | - Perintah Pencegahan dan Pengawasan Penyakit Berjangkit (Pengisytiharan Kawasan Tempatan Jangkitan) (Pengkompaunan Kesalahan-kesalahan) (Pindaan) (No.7) 2020 – Amendment on 2020.   |          |
| 2.1.3   | Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. | <p>The boundary for all estates visited was clearly demarcated and visibly maintain. Sighted the boundary demarcation as follows:</p> <p>Welch Estate:<br/> The estate legal boundary was clearly demarcated with security trenches and red and white colour pole. Sighted the boundary at field P1999 adjacent with Durian Farm. The boundary was visibly maintained.</p> <p>Diamond Jubilee Estate:<br/> The estate legal boundary was clearly demarcated with security trenches. Sighted the boundary at field P07H-1 adjacent with Kg. Cenderoh. The boundary was visibly maintained.</p> <p>Bukit Asahan Estate:<br/> The estate legal boundary was clearly demarcated with security trenches and red colour pole. Sighted the boundary at field P00J adjacent with Kg. Bukit Asahan and P00L adjacent with Kem Asahan. The boundary was visibly maintained.</p> | Complied |
| <b>Criteria 2.2</b>   |   |   |          |
| All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. |   |   |          |
| 2.2.1   | A list of contracted parties is maintained.   | The operating units has listed all contracted parties and documented in KKS Diamond Jubilee Stakeholder List. In the list includes internal stakeholders such as employee and workers union and external stakeholders such as FFB suppliers, contractors, transporters and government department.   | Complied |

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| <p>2.2.2</p> | <p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> | <p>The operating units has listed all contracted parties and documented in KKS Diamond Jubilee Stakeholder List. In the list includes internal stakeholders such as employee and workers union and external stakeholders such as FFB suppliers, contractors, transporters and government department.</p> <p>All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with para</p> <ul style="list-style-type: none"> <li>- a (i); Vendor Code of Business Conduct (VCOBC)</li> <li>- a (ii); all applicable laws and regulations related anti-bribery, fraud and corruption.</li> </ul> <p>Sighted the sampled contracts as follows:</p> <ul style="list-style-type: none"> <li>i. Contracts between The Sime Darby Plantation Bhd. with Teo Tuan Kwee Sdn. Bhd. dated 19/12/2017 and extension email for contract extension dated 1/5/2020.</li> <li>ii. Contracts between Sime Darby Plantation Berhad, Welch Estate with Lim Beng Kong dated 1/1/2020</li> </ul> <p>Sime Darby has issued Memorandum to all contractors dated 26/6/2019. In the memorandum stated the contractors have to comply as follows;</p> <ul style="list-style-type: none"> <li>i. Comply with local legal requirements</li> <li>ii. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company</li> <li>iii. Having signed and enforceable agreement with the company</li> <li>iv. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary</li> <li>v. Having related working permits</li> <li>vi. Ensure PPE utilization by contractors' employee while being in the company premise.</li> </ul> | <p>Complied</p> |
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**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |   |  |          |
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|   |   | Sighted memorandum acknowledgement as follows:<br>i. Teo Tuan Kwee Sdn. Bhd signed by company representative dated 8/8/2019.<br>ii. Lim Beng Keong signed by company representative dated 2/7/2020.  |          |
| 2.2.3   | All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.  | Generic clause related to disallowing child, forced and trafficked labour written in Vendor Integrity Pledge (VIP).<br><br>All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with para<br>- a (i); Vendor Code of Business Conduct (VCOBC)<br>- a (ii); all applicable laws and regulations related anti-bribery, fraud and corruption. | Complied |
| <b>Criteria 2.3</b>   |   |  |          |
| All FFB supplies from outside the unit of certification are from legal sources. |   |  |          |
| 2.3.1   | <b>(C)</b> For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/ smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> | The mill only received FFB from Sime Darby Group Estate. The mill have the information on the geo-location, evidence of the ownership status to the land and valid MPOB license.   | Complied |
| 2.3.2   | For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.   | The mill received FFB directly from Sime Darby Group Estate  | N/A      |
| <b>PROCEDURAL NOTE:</b>   |   |  |          |
| For Implementation Procedure for 2.3.2 refer to Annex 4.                        |   |  |          |

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| <p><b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b><br/>         Implement plans, procedures and systems for continuous improvement.</p>  |   |   |          |
| <p><b>Criteria 3.1</b><br/>         There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p> |   |   |          |
| 3.1.1  | <p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> | <p>SOU 18 has continued its commitment to long term sustainability and improvements through a capital expenditure program. The management has forecasted 5 years business plan from FY 2020 – 2024 documented in the M-Plan system.</p> <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. Sighted the annual budget FY 2020 and business plan FY 2020 – FY 2024 in the M-Plan.</p> <p>In the 5 years business plan include items as follows:</p> <ul style="list-style-type: none"> <li>a. Palm oil mill             <ul style="list-style-type: none"> <li>i. Mill intake – FFB input</li> <li>ii. Production of CPO</li> <li>iii. Production of PK</li> <li>iv. Total Palm Oil Extraction</li> <li>v. Total Palm Kernel Extraction</li> <li>vi. Mill cost</li> </ul> </li> <li>b. Oil Palm Estate             <ul style="list-style-type: none"> <li>i. Total crop projection and yield potential</li> <li>ii. Activity direct cost                 <ul style="list-style-type: none"> <li>a. Mature upkeep</li> <li>b. Manuring</li> <li>c. Harvesting and collection</li> </ul> </li> </ul> </li> </ul> | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|  |   | <p>d. Transportation<br/> e. Nursery<br/> iii. Estate administration<br/> a. Admin Cost<br/> iv. Labour overhead<br/> v. Road and bridges<br/> vi. Cost of production.</p> <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2024) and well documented upon request.</p>  |          |        |        |      |      |      |       |      |      |      |      |      |                 |      |       |      |       |        |             |       |        |        |        |        |          |
|--|---|--|----------|--------|--------|------|------|------|-------|------|------|------|------|------|-----------------|------|-------|------|-------|--------|-------------|-------|--------|--------|--------|--------|----------|
| 3.1.2  | An annual replanting programme projected for a minimum of five years with yearly review, is available.                                    | <p>Latest review on LRRP FY 2020 as per email from Performance Monitoring Units dated 19/5/2020. Long range replanting program for SOU 18 for the next 5 years as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Welch</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Diamond Jubilee</td> <td>0.00</td> <td>56.56</td> <td>0.00</td> <td>87.11</td> <td>142.96</td> </tr> <tr> <td>Bkt. Asahan</td> <td>66.99</td> <td>145.82</td> <td>214.11</td> <td>253.84</td> <td>260.38</td> </tr> </tbody> </table> | Estate   | 2021   | 2022   | 2023 | 2024 | 2025 | Welch | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | Diamond Jubilee | 0.00 | 56.56 | 0.00 | 87.11 | 142.96 | Bkt. Asahan | 66.99 | 145.82 | 214.11 | 253.84 | 260.38 | Complied |
| Estate   | 2021  | 2022   | 2023     | 2024   | 2025   |      |      |      |       |      |      |      |      |      |                 |      |       |      |       |        |             |       |        |        |        |        |          |
| Welch  | 0.00  | 0.00   | 0.00     | 0.00   | 0.00   |      |      |      |       |      |      |      |      |      |                 |      |       |      |       |        |             |       |        |        |        |        |          |
| Diamond Jubilee  | 0.00  | 56.56  | 0.00     | 87.11  | 142.96 |      |      |      |       |      |      |      |      |      |                 |      |       |      |       |        |             |       |        |        |        |        |          |
| Bkt. Asahan  | 66.99   | 145.82   | 214.11   | 253.84 | 260.38 |      |      |      |       |      |      |      |      |      |                 |      |       |      |       |        |             |       |        |        |        |        |          |
| 3.1.3  | The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. | <p>Management review meeting done annually and attended by all relevant head of units/department. The meeting agenda adequately covered all the required agenda as per P&amp;C 2018 with the latest management review meeting done on 30/6/2020 at POM, 26/06/2020 at Welch Estate, 07/07/2020 at Diamond Jubilee Estate and on 15/06/20 Bukit Asahan Estate.</p>  | Complied |        |        |      |      |      |       |      |      |      |      |      |                 |      |       |      |       |        |             |       |        |        |        |        |          |
| <p><b>Criteria 3.2</b><br/> The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p> |   |  |          |        |        |      |      |      |       |      |      |      |      |      |                 |      |       |      |       |        |             |       |        |        |        |        |          |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |   |   |          |
|---|---|---|----------|
| 3.2.1   | <b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. | <p>The operating unit has documented the continual improvement plan in Environmental Management Plan, Health and Safety Management Plan and Social Management Plan.</p> <p>For palm oil mill, Continual Improvement was demonstrated based on project initiated by mill management. The project focus mainly on cost saving and process losses minimization for each financial year. Sample of completed project for FY 2020:</p> <ul style="list-style-type: none"> <li>i. Control raw Tank and Water Clarifier Tank Based on buffer tank level <ul style="list-style-type: none"> <li>a. Reduce 1 manpower daily on operation and monitoring</li> <li>b. Water consumption saving</li> </ul> </li> <li>ii. Automate dosing pump operation. Dosing pump operation based on water flowrate <ul style="list-style-type: none"> <li>a. Better accuracy on chemical dosing</li> <li>b. Chemical cost saving</li> </ul> </li> </ul> | Complied |
| 3.2.2   | As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.                                       | <p>There's no submission made by Sime Darby of RSPO metrics template yet, pending its availability by RSPO secretariat. Latest submission of Annual Communications of Progress (ACOP) done for year 2019 available as in RSPO website link as following: <a href="https://document.rspo.org/Sime_Darby_Plantation_Berhad_ACOP2019.pdf">https://document.rspo.org/Sime_Darby_Plantation_Berhad_ACOP2019.pdf</a></p>  | Complied |
| <p><b>PROCEDURAL NOTE</b> for 3.2.2: THE RSPO metrics template is awaiting decision/ agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> |   |   |          |
| <p><b>Criteria 3.3</b><br/> Operating procedures are appropriately documented, consistently implemented and monitored.</p>  |   |   |          |
| 3.3.1   | <b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.   | SOP were available and sighted for the Palm Oil Mill and the audited Estates. Details as follows:   | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |   |   |          |
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|       |   | <p><u>Diamond Jubilee Palm Oil Mill</u></p> <p>Palm Mill holds 22 Pictorial Safety Standard SOPs as a guidance document to operate the mill. The Topics covered for Mill SOP includes Laboratory, Emergency Preparedness, Auxiliary Police Station, Weighbridge, FFB Hopper, Sterilizer, Thresher, Press, Oil Station, Nut/Kernel Plant, Storage Tank Area, Effluent Treatment Plant, Store, Maintenance, Boiler/Engine Room, Admin Office, Canteen, Despatch, Transportation and Permit to Work.</p> <p>Estates have a separate SOP (Pictorial Safety Standard for Oil Palm Estate, Rev. 0, Effective Date: 17/03/2020 and Standard Operating Procedure for Oil Palm Estates Level 3 – Covers e.g. Oil Palm Nursery, Estate Upkeep and Cultivation, Harvesting and Collection and etc</p> <p>Communicable Disease (COVID-19) Prevention &amp; Control Procedure, Doc. No. SDPB/USM/HSE/001, Rev.0, Date: 4/05/2020 has also been established for the CCOVID-19 pandemic control.</p> |          |
| 3.3.2 | A mechanism to check consistent implementation of procedures is in place. | Performance Monitoring Unit (PMU) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Verified that there was a consistent implantation of procedures is in place at POM and all estates.   | Complied |
| 3.3.3 | Records of monitoring and any actions taken are maintained and available. | Sime Darby has established a system to monitor the mill and estate operation. The Structured Oil Recovery Assessment (SORA) (for Mill) / Structured Crop Recovery Assessment (SCRA) (for estates) and Planning and Monitoring Unit visited the operating units quarterly. Their reports cover on all aspect of operation. In addition, visit by agronomist was made yearly. The report focusing on rainfall, yield [performing and under-performing], palm nutrition status, field observation agronomic matters and fertilizer recommendation has been included in the report. All the reports of monitoring were available at estate and mill office for references.  | Complied |
|       |   | <u>Diamond Jubilee Palm Oil Mill</u>  |          |



**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |   |  |          |
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|   |   | <p>Mill advisor visit was conducted once a year. Latest visit was conducted on 21-23/10/19. Refer report no. SOU 18/DJM/02/2019 with score ratings at 86.00. All areas of concern raised has been addressed by the mill accordingly.</p> <p><u>Welch Estate:</u><br/>         Seen the Estate Structured Crop Recovery Assessment Report &amp; Estate Mature Upkeep Assessment Report for SOU18-Diamond Jubilee – Welch Estate dated 5/06/2020. The assessment was done by the PMU.</p> <p><u>Bukit Asahan Estate</u><br/>         PA visit was conducted accordingly. Latest visit was conducted on 19-21/08/19. Areas of concern raised has been addressed e.g. on yield improvement has been mitigated accordingly.</p> <p><u>Diamond Jubilee Estate</u><br/>         Seen the Estate Structured Crop Recovery Assessment Report dated 4/06/2020 &amp; Estate Mature Upkeep Assessment Report dated 25/06/2020. The assessment was done by the PMU.</p> |          |
| <p><b>Criteria 3.4</b><br/>         A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p> |   |  |          |
| 3.4.1   | <p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p> | <p>Based on interviews conducted, documents reviewed and observations made during field visits, there is no evidence of any new plantings being carried out within the Diamond Jubilee SOU 18.</p> <p><u>Diamond Jubilee POM:</u><br/>         Mill Aspect &amp; Impact Assessment Identification (EAI) including Environmental Impact Evaluation (EIE) been conducted accordingly. The latest review was done on 9/6/2020. The EAI are divided into the all stations in the mill processing and covered sampled activities e.g. a) the boiler stack emission, black smoke</p>   | Complied |

|  |  |  |  |
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|  |  | <p>b) palm oil mill effluent (POME) discharge and water contamination, c) Activities related to managing of scheduled wastes and general waste, d) Activities of all operations beginning from the mill entrance ending to the effluent, EFB operations. The EAI as detailed in the estates register covers all estates activities/operations. There were no changes since the last review for all the three estates. The significant environmental aspects related to the estate operation among others include the following;</p> <ul style="list-style-type: none"> <li>a) FFB transportation to the mill.</li> <li>b) Movement of vehicles/transportation of estates machines and tractors.</li> <li>c) Herbicide/pesticides spraying</li> <li>d) Anti-malaria fogging</li> <li>e) Road resurfacing &amp; grading</li> <li>f) Grass cutting</li> <li>g) Construction activities</li> <li>h) Harvesting, pest and disease,</li> <li>i) Nursery /replanting</li> <li>j) Landfill</li> <li>k) Scheduled waste handling</li> </ul> <p>The latest date of the EAI &amp; EIE at Welch Estate was carried out on 11/05/2020, at 01/01/20 at Diamond Jubilee Estate.</p> <ul style="list-style-type: none"> <li>- At Bukit Asahan Estate the latest review on the EAI &amp; EIE was also conducted accordingly in May 2020 with involved of relevant stakeholders.</li> </ul> <p>For Diamond Jubilee POM, Diamond Jubilee Estate, Bukit Asahan Estate and Serkam Estate (currently transferred to SOU 19 certification unit) SIA was conducted as per Social Impact Assessment (SIA) Report SOU 18 Diamond Jubilee; Assessment date: 12-15 July 2016</p> |  |
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**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|                   |   | <p>For Welch Estate, originally under SOU 19, SIA was conducted as per Social Impact Assessment (SIA) Report SOU 19 Pagoh; Assessment date: 5-8 May 2015.</p>  |              |           |              |             |                                    |   |  |   |  |                   |   |   |              |           |              |                   |                                    |   |                 |
|-------------------|---|--|--------------|-----------|--------------|-------------|------------------------------------|---|--|---|--|-------------------|---|---|--------------|-----------|--------------|-------------------|------------------------------------|---|-----------------|
| <p>3.4.2</p>      | <p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> | <p>As per latest DJPOM Social Management Plan June 2020, management plan established and implemented based on original assessment and feedbacks from stakeholder consultation meeting. Among feedbacks from stakeholders been taken action with plans established sighted as following:</p> <table border="1" data-bbox="958 592 1731 1129"> <thead> <tr> <th>Stakeholders</th> <th>Feedbacks</th> <th>Action plans</th> </tr> </thead> <tbody> <tr> <td>Own workers</td> <td>Stray dogs at housing complex area</td> <td>Report and follow-up with Majlis Perbandaran Jasin for resolution</td> </tr> <tr> <td></td> <td>Street lighting at housing area malfunction</td> <td>To speed up repair of street lightings</td> </tr> <tr> <td>Local communities</td> <td>Invitation for local event contribution</td> <td>Contribution to local communities' program:<br/>                     - Industrial visit to mill by UTHM student<br/>                     - Exhibition on anti-drugs campaign by SMK Simpang Bekoh</td> </tr> </tbody> </table> <p>Sample Social Management Plan June 2020 for Welch Estate sighted as following:</p> <table border="1" data-bbox="958 1219 1731 1374"> <thead> <tr> <th>Stakeholders</th> <th>Feedbacks</th> <th>Action plans</th> </tr> </thead> <tbody> <tr> <td>Local communities</td> <td>Government roadside fronds causing</td> <td>To schedule and conduct regular (monthly) pruning for</td> </tr> </tbody> </table> | Stakeholders | Feedbacks | Action plans | Own workers | Stray dogs at housing complex area | Report and follow-up with Majlis Perbandaran Jasin for resolution |  | Street lighting at housing area malfunction | To speed up repair of street lightings | Local communities | Invitation for local event contribution | Contribution to local communities' program:<br>- Industrial visit to mill by UTHM student<br>- Exhibition on anti-drugs campaign by SMK Simpang Bekoh | Stakeholders | Feedbacks | Action plans | Local communities | Government roadside fronds causing | To schedule and conduct regular (monthly) pruning for | <p>Complied</p> |
| Stakeholders      | Feedbacks   | Action plans   |              |           |              |             |                                    |   |  |   |  |                   |   |   |              |           |              |                   |                                    |   |                 |
| Own workers       | Stray dogs at housing complex area  | Report and follow-up with Majlis Perbandaran Jasin for resolution  |              |           |              |             |                                    |   |  |   |  |                   |   |   |              |           |              |                   |                                    |   |                 |
|                   | Street lighting at housing area malfunction   | To speed up repair of street lightings   |              |           |              |             |                                    |   |  |   |  |                   |   |   |              |           |              |                   |                                    |   |                 |
| Local communities | Invitation for local event contribution   | Contribution to local communities' program:<br>- Industrial visit to mill by UTHM student<br>- Exhibition on anti-drugs campaign by SMK Simpang Bekoh  |              |           |              |             |                                    |   |  |   |  |                   |   |   |              |           |              |                   |                                    |   |                 |
| Stakeholders      | Feedbacks   | Action plans   |              |           |              |             |                                    |   |  |   |  |                   |   |   |              |           |              |                   |                                    |   |                 |
| Local communities | Government roadside fronds causing  | To schedule and conduct regular (monthly) pruning for  |              |           |              |             |                                    |   |  |   |  |                   |   |   |              |           |              |                   |                                    |   |                 |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|                             |   | <table border="1" data-bbox="958 363 1731 502"> <tr> <td data-bbox="958 363 1137 502"></td> <td data-bbox="1137 363 1422 502">nuisance toward Kg. Kenangan</td> <td data-bbox="1422 363 1731 502">all roadside oil palm tree mainly at P02C1 &amp; boundary to Kg. Kenangan field</td> </tr> </table> <p data-bbox="958 555 1942 614">Sample Social Management Plan FY 2020 for Diamond Jubilee Estate sighted as following:</p> <table border="1" data-bbox="958 625 1731 901"> <thead> <tr> <th data-bbox="958 625 1137 678">Stakeholders</th> <th data-bbox="1137 625 1422 678">Feedbacks</th> <th data-bbox="1422 625 1731 678">Action plans</th> </tr> </thead> <tbody> <tr> <td data-bbox="958 678 1137 785">SJKT Ladang Diamond Jubilee</td> <td data-bbox="1137 678 1422 785">Request for repair of school fencing and drain SJK(T)DJ</td> <td data-bbox="1422 678 1731 785">Budgeting for school fencing repair works</td> </tr> <tr> <td data-bbox="958 785 1137 901">Field workers</td> <td data-bbox="1137 785 1422 901">Cattle encroachment may cause hazard to workers at field</td> <td data-bbox="1422 785 1731 901">To consult cattle owners</td> </tr> </tbody> </table> <p data-bbox="958 954 1942 1114">For environmental part, EIA is available and been reviewed periodically during the Health, Safety &amp; Environmental quarterly meeting as per records of for progress and updates of management plan. E.g. at Diamond Jubilee POM, latest meeting done on 13/4/20, Welch Estate on 26/6/20, Diamond Jubilee Estate on 21/5/20 and at Bukit Asahan Estate on 6/05/20.</p> |          | nuisance toward Kg. Kenangan | all roadside oil palm tree mainly at P02C1 & boundary to Kg. Kenangan field | Stakeholders | Feedbacks | Action plans | SJKT Ladang Diamond Jubilee | Request for repair of school fencing and drain SJK(T)DJ | Budgeting for school fencing repair works | Field workers | Cattle encroachment may cause hazard to workers at field | To consult cattle owners |  |
|-----------------------------|---|---|----------|------------------------------|---|--------------|-----------|--------------|-----------------------------|---|---|---------------|--|--------------------------|--|
|                             | nuisance toward Kg. Kenangan  | all roadside oil palm tree mainly at P02C1 & boundary to Kg. Kenangan field   |          |                              |   |              |           |              |                             |   |   |               |  |                          |  |
| Stakeholders                | Feedbacks   | Action plans  |          |                              |   |              |           |              |                             |   |   |               |  |                          |  |
| SJKT Ladang Diamond Jubilee | Request for repair of school fencing and drain SJK(T)DJ   | Budgeting for school fencing repair works   |          |                              |   |              |           |              |                             |   |   |               |  |                          |  |
| Field workers               | Cattle encroachment may cause hazard to workers at field  | To consult cattle owners  |          |                              |   |              |           |              |                             |   |   |               |  |                          |  |
| 3.4.3                       | <b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. | <p data-bbox="958 1141 1942 1236">Environmental Management Plan was established, reviewed and updated at least on yearly basis or whenever there is a changes on a regular basis in a participatory way at POM and Estates. Details checked as follows:</p> <p data-bbox="958 1248 1220 1276"><u>Diamond Jubilee POM:</u></p> <p data-bbox="958 1287 1942 1383">Environmental Management Plan last updated on 5/7/2020. The plan includes on waste and pollution management plan on reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, Sampled details as below:</p>  | Complied |                              |   |              |           |              |                             |   |   |               |  |                          |  |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|  |  | <p>a) Domestic waste (Workers Housing Complex, Office, Workshop, Store, Shop) – Domestic waste collection by tractor and dumped in trash bin before dispose by the contractor – Frequency is twice a week.</p> <p>b) Scheduled Waste – Used lubricant &amp; Hydraulic oil, Used Empty Chemical Container, spent chemical from Lab, Contaminated Rags or other waste from maintenance activities – Ensure good working condition of SW store (locked, no chemical spill, signage) – Quarterly inspection.</p> <p>c) Industrial Waste – POME – Monitoring of POME BOD level at final discharge point – Frequency is monthly.</p> <p>d) GHG – Boiler operation - Installation of VORSEP to reduce dust particulate &amp; black smoke emission.</p> <p>At Welch Estate_Environmental Management Plan last updated on 11/05/2020, at Diamond Jubilee Estate last reviewed on 17/06/2020. Whereas at Bukit Asahan Estate, latest review was done on 3/01/2020.</p> <p>The plan includes on managing domestic waste, industrial waste, scheduled waste, recycling waste, electricity and diesel management, HVC including pollution prevention.</p> <p>SIA Action Plans were reviewed during stakeholder consultation meeting as per example, latest conducted on 7/7/2020 for DJPOM &amp; DJ Estate, 2/7/2020 for Welch Estate.</p> |                 |
| <p><b>Criteria 3.5</b><br/> A system for managing human resources is in place.</p> |  |   |                 |
| <p>3.5.1</p>   | <p>Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination are documented and made available to the workers and their representatives where applicable.</p> | <p>DJPOM has implemented Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 2<sup>nd</sup> December 2019, where the management is committed to contributing to a better society includes respecting, upholding &amp; no-exploitation of fundamental human rights, providing safe and healthy workplaces and protecting workers’ welfare and engaging and empowering communities.</p>  | <p>Complied</p> |

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|   |  | The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liason and recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre (WMC) Sua Betong, Careline and estate are available upon request.   |                |
| 3.5.2   | Employment procedures are implemented and records are maintained.  | The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liason and recruitment, documentation and processing processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre (WMC) Sua Betong, Careline and estate are available upon request. This procedure been explained to worker during the induction training on their first time arrival.<br><br>Seen the training certificates for the workers who has attended the induction training/records during early employment.  | Complied       |
| <b>Criteria 3.6</b>   |  |   |                |
| An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented. |  |   |                |
| 3.6.1   | <b>C)</b> All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. | Sime Darby has established the Upstream Malaysia Health, Safety and Environment (HSE) Policy Statement signed by the CEO, Upstream Malaysia dated 1/6/2020.<br><br>In the Policy Statement stated the commitment to provide safe and healthy workplace and operating in an environmentally responsible manner at all their operation in Malaysia<br><br>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the mill and estate.<br><br>Sime Darby has established SOP for HIRARC. Refer Estate Quality Management System, Level 2: Standard Operating Manual, Subsection 5.4: Planning, Appendix 5.4.1a Hazard Identification, Risk Assessment and Risk Control (HIRARC) Procedure ver. 1 Year 2008, issue no. 1 dated 1/4/2008. | Non-compliance |

**RSPO P&C Public Summary Report  
Revision 10 (Mar 2020)**

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|  |  | <p>SOU 18 has conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and Risk Control (HIRARC) and chemical Hazard Risk Assessment. The assessment cover all main operations and support operations. The HIRARC was reviewed at minimum once a year, if accident occur or changes on the operation.</p> <p>DJPOM</p> <p>The HIRARC review was conducted on annually basis. Review for accident cases was conducted 3/12/2019 due to accident cases occur on 3/11/2019 at boiler station. Latest review was conducted on 19/5/2020 with inclusion of COVID-19 monitoring.</p> <p>For construction of and installation of new boiler, the contractors provided the mill with own HIRARC/JSA.</p> <p>Welch Estate</p> <p>The HIRARC was reviewed on at minimum of once a year or during accident occur. FY 2020, the review on 1/4/2020 has included the risk assessment for Infectious Disease (COVID-19). Latest review was conducted on 1/7/2020 due to accident occur on 11/6/2020 at grass cutting operation, 1/6/2020 due to accident occur in harvesting operation, and 19/5/2020 in transporting fertilizer activity.</p> <p>Noted during HIRARC review, the risk assessment for loading ramp were not covered all risk at the workstation. The current assessment only covered on the risk for moving vehicle and FFB loading into the ramp. The risk for ramp attendant working at the station was not covered in the HIRARC report.</p> <p>Diamond Jubilee Estate</p> <p>The HIRARC was reviewed on at minimum of once a year or during accident occur. FY 2020, the review on 16/5/2020 has included the risk assessment for Infectious Disease (COVID-19). Latest review was conducted on 7/7/2020 due to accident occur on 25/6/2020 in harvesting operation.</p> |  |
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**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|              |  | <p>Noted during HIRARC review, the risk assessment for FFB evacuation were not covered all risk at the workstation. The current assessment only covered on the risk for moving vehicle and FFB loading into the BIN. The risk for ramp attendant/FFB loader working at the station was not covered in the HIRARC report.</p> <p>Sighted during site visit at the nursery, sighted the water pump belting which coupled the Diesel Engine and the Water Pump at the Oil Palm Nursey was not fully guarded to provide protection during operation. Noted during HIRARC review, the guard for belting were not identified in the existing control for pump house operation.</p> <p>Hence, a Major NC has been raised on the matters.</p> <p>Bukit Asahan Estate</p> <p>The HIRARC was reviewed on at minimum of once a year or during accident occur. FY 2020, the review on 29/4/2019 has included the risk assessment for Infectious Disease (COVID-19) and on 9/3/2020 due to accident occur on 7/3/2020 in FFB collection operation.</p> |                 |
| <p>3.6.2</p> | <p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> | <p>The operating units has established and documented safety and health plan. The plan was monitored on timely basis by the person responsible assigned. Sighted the implementation of the management plan as follows:</p> <p>The mill and estates visited had established safety and health plan and documented in OSH Management Plan FY 2020. The plan covers on OSH Risk Management, OSH Structure, Incident Reporting, Emergency Preparedness and Response, Chemical Safety and Management, Noise Management, Contractor Safety Management, Inspection, Awareness and competency training and DOSH visit.</p> <p>Sighted the sampled implementation of the management plan as follows:</p> <p>DJPOM</p> <p>i. Audiometric was conducted on annually basis. Latest audiometric test was conducted on 29/7/2019. Refer report ref. no. PRO/July/19(KKSDJ/86). 86 workers were sent for test with 17 workers found with abnormal results with 6 workers were</p>  | <p>Complied</p> |



**RSPO P&C Public Summary Report  
Revision 10 (Mar 2020)**

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|                     |  | <p>required retest within 3 months. The workers were sent for retest on 16/12/2019. 4 workers were confirmed with hearing impairment and DOSH have been notified through JKKP 7 form on 30/12/2019.</p> <p>ii. Latest medical surveillance was conducted on 28 - 29/1/2020 by certified OHD with reg. no. HQ/17/OHD/00/00094. 22 workers were sent for surveillance and found fit to work.</p> <p>Welch Estate</p> <p>Latest review on the OSH management plan was conducted on 11/5/2020. Sighted the implementation as follows:</p> <p>i. Latest CHRA has been conducted on 10/6/2020 by certified assessor with reg. no. HQ/15/ASS/00/363. The report has yet to be received by the estate.</p> <p>Diamond Jubilee Estate</p> <p>i. Latest medical surveillance for chemical handlers was conducted on 22/6/2020 by certified OHS with reg. no. HQ/17/OHD/00/00094. 25 workers were sent for surveillance and all found fit to work as chemical handlers.</p> <p>ii. Latest CHRA has been conducted on 8/7/2020 by certified assessor with reg. no. HQ/15/ASS/00/363. The report has yet to be received by the estate.</p> <p>Bukit Asahan Estate</p> <p>i. Latest CHRA has been conducted on 8/7/2020 by certified assessor with reg. no. HQ/15/ASS/00/363. The report has yet to be received by the estate.</p> <p>ii. Workplace Inspection was conducted on quarterly basis prior to Safety and Health committee meeting. Sighted the inspection records dated 4/2/2020 and 6/5/2020. The result was discussed in the Safety and Health committee meeting.</p> |  |
| <b>Criteria 3.7</b> |  |  |  |

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| All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained. |  |   |          |
| 3.7.1  | (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training. | <p>The mill has established training plan base on training need analysis conducted and documented in KKS Diamond Jubilee Training Schedule 2020. The training plan covers all job designation including the contractors. 24 training were identified and schedule throughout 2020 covering aspects such as OSH, Environmental, Policy and others</p> <p>For contractors, there are 8 trainings such as OHS, discipline and waste management incorporated, and it being briefed before starts any works and recorded in "Permit to Work".</p> <ul style="list-style-type: none"> <li>- The estates visited has established training plan base on training need analysis conducted and documented in Welch Estate Training Plan 2020. The training plan covers all job designation including the contractors. 25 training were identified and schedule throughout 2020 covering aspects such as OSH, Environmental, Policy and others.</li> </ul> | Complied |
| 3.7.2  | Records of training are maintained.  | <p>The operating units visited has established training plan base on the training need analysis conducted. The training plan covers all job designation including the contractors.</p> <p>Sighted the sample training records as follows:</p> <p>DJPOM</p> <ul style="list-style-type: none"> <li>i. Noise exposure monitoring training dated 20 and 28/1/2020</li> <li>ii. Safety briefing during weekly morning assembly dated 2/12/2019</li> <li>iii. Confined space and PTW briefing dated 27/11/2019</li> <li>iv. Oil and chemical spillage handling training dated 23/7/2019</li> <li>v. Hearing conservation training dated 11/7/2019</li> <li>vi. First aid training dated 11/7/2019</li> <li>vii. Safety machinery training dated 11/7/2019</li> </ul>   | Complied |

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|  |  | <p>viii. Chemical safety handling dated 11/7/2019</p> <p>Welch Estate</p> <ul style="list-style-type: none"> <li>i. Health, Safety and Environment Policy briefing dated 29/6/2020</li> <li>ii. FFB ripeness standard training dated 17/3/2020</li> <li>iii. Manuring training dated 26/2/2020</li> <li>iv. Inter pump maintenance and spraying training dated 21/1/2020</li> <li>v. Safety and SOP for pruning training dated 4/12/2019</li> <li>vi. Fire drill training dated 14/10/2019</li> </ul> <p>Diamond Jubilee Estate</p> <ul style="list-style-type: none"> <li>i. Manuring training dated 7/1/2020</li> <li>ii. Deboling training dated 10/1/2020</li> <li>iii. Newly mature palm harvesting training dated 7/2/2020</li> </ul> <p>Fire extinguisher training dated 10/2/2020</p> <ul style="list-style-type: none"> <li>iv. First aid training dated 11/2/2020</li> <li>v. Safety briefing dated 14/2/2020</li> <li>vi. Water management training dated 26/2/2020</li> <li>vii. Spraying training dated 9/3/2020</li> <li>viii. Spillage drill training dated 24/6/2020</li> <li>ix. IPM training dated 2/7/2020</li> </ul> <p>Bukit Asahan Estate</p> <ul style="list-style-type: none"> <li>i. MB driver and harvesting refresher training dated 10/3/2020</li> <li>ii. New Policy briefing dated 8/7/2020</li> </ul> |  |
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**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|   |   | <ul style="list-style-type: none"> <li>iii. Alion application at mature palm area training dated 10/3/2020</li> <li>iv. LCC establishment training dated 15/10/2019</li> <li>v. Chemical management, noise and ergonomic training dated 14/10/2019.</li> <li>vi. Pruning work plan and progressive pruning briefing dated 12/9/2019</li> <li>vii. HIRARC and accident investigation training dated 26-27/9/2019</li> <li>viii. Fire drill training dated 26/7/2019</li> </ul>   |          |
| 3.7.3   | <p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p>  | <p>Relevant personnel to supply chain implementation as defined by the OU are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor &amp; assistant, weighbridge operators.</p> <p>The latest RSPO SCCS training was carried out as follows:</p> <ul style="list-style-type: none"> <li>i. Centralize SCCS personnel training dated 13/6/2019 at Merlimau Training Centre by GSQM Team.</li> <li>ii. SCCS training for contractors dated 18/6/2019</li> </ul> <p>The training frequency can be enhance and cover more personnel involve in the implementation of the Supply Chain Certification Standard (SCCS)</p> | OFI      |
| <p><b>Criterion 3.8</b><br/> Supply chain requirement for mills (<b>note: all supply chain requirements are considered as critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle</b>)</p> |   |   |          |
| <p><b>Definition</b></p>  |   |   |          |
| 3.8.1   | <p>Definition Identity Preserved Mill D.1:<br/> A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme. Certification for CPO mills</p> | <p>FFB were obtained from all Sime Darby certified estates only. There was no third party's crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill.</p>  | Complied |

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|       | 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. If a mill processes certified and uncertified FFB without physically separating them, then only Module E is applicable.   |   |          |
| 3.8.2 | <p>Definition Mass Balance Mill E.1</p> <p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3<sup>rd</sup> party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB</p> | Not applicable as Diamond Jubilee POM applied Identity Preserve (IP) supply chain module.   | N/A      |
| 3.8.3 | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall 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 oil palm 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>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>The mill license available at PalmTrace as following:</p> <ul style="list-style-type: none"> <li>- Member ID: RSPO_PO1000000187</li> <li>- Member category: Oil Mill</li> <li>- RSPO Membership No.: 1-0008-04-000-00</li> </ul> | Complied |
| 3.8.4 | The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.  | <p>The mill license available at PalmTrace as following:</p> <ul style="list-style-type: none"> <li>- Member ID: RSPO_PO1000000187</li> <li>- Member category: Oil Mill</li> <li>- RSPO Membership No.: 1-0008-04-000-00</li> </ul>   | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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| <p>3.8.5</p> | <p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of 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 mill's procedures for the implementation of this standard.</li> </ul> <p>The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</p> | <p>Sustainable Plantation Management System, Appendix 15, SOP for Sustainable Supply Chain and Traceability, Version 2, Issue Date: April 2019. The procedure was established which covered responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.</p> <p>Appointment Letter as Person In charge for Sustainability Certification of Management Systems available – Hanif Ab. Talib (Assistant Manager, KKS Diamond Jubilee dated March 2018. The appointed person has been able to demonstrate awareness of the mill's procedures for the implementation of SCC.</p> | <p>Complied</p> |
| <p>3.8.6</p> | <p>Internal Audit</p> <ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the</li> </ul> </li> </ul>  | <p>Internal audit conducted based on the SOP for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (18: Internal Audit); Version 2; Issue # 5; Date: April 2019. The procedure conforms to the requirements in the RSPO SCCS. Latest internal audit was conducted on 12/6/2020 together with RSPO SCCS and MSPO. 2 Minor NC was raised by internal auditor during the audit. The findings have been resolved by the mill and attached in the audit report. The outcomes of the internal</p>   | <p>Complied</p> |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|              | <p>RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p> | <p>audits and all actions taken to correct non-conformities has been subject to management review at least annually with the latest review done on 30/06/2020.</p>  |                 |
| <p>3.8.7</p> | <p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>   | <p>Addressed in the Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 6.0 delivery FFB from Estate.</p> <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 and uncertified FFB. Records verified by internal and external audit.</p> <p>DJPOM have a system to verify at the weighbridge. Information for RSPO certified FFB were recorded in FFB Consignment notes and weighbridge tickets. Records verified during the audit as follow:</p> <p>Sighted the sampled delivery off FFB as follows:</p> <p>i. Diamond Jubilee Estate</p> <p>Date: 30/6/2020</p> <p>C/N no.: 538057</p> <p>RSPO Cert. no. RSPO 591224</p> <p>W. Ticket no.: 115983</p> | <p>Complied</p> |

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|  |  | <p>Net Weight: 4770 kg</p> <p>ii. Welch Estate<br/>Date: 30/6/2020<br/>C/N no.: 1870<br/>RSPO Cert. no. RSPO 600305<br/>W. Ticket no.: 115975<br/>Net Weight: 12460 kg</p> <p>iii. Tangkah Estate<br/>Date: 30/6/2020<br/>C/N no.: 29549<br/>RSPO Cert. no. RSPO-PC 00101<br/>W. Ticket no.: 115986<br/>Net Weight: 12680 kg</p> <p>There is no overproduction of certified tonnage of CPO.</p> <p>Mechanism in place for handling non-conforming oil palm products and/or documents has been documented in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 11 Non-conforming products and/or documents.</p> |  |
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|              |  | <p>Where there is contamination of RSPO/MSPO certified material during receiving, processing, storage and dispatch, the mill/estate shall downgrade the materials following the downgrade order: RSPO: IP -&gt; MB -&gt; Non-certified.</p>   |                 |
| <p>3.8.8</p> | <p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> </ul> <p>A unique identification number.</p> | <p>Sampled of the sales and goods out delivery records as below:</p> <p>CSP0</p> <ul style="list-style-type: none"> <li>a. The name and address of the buyer: Sime Darby Jomalina</li> <li>b. The name and address of the seller: Diamond Jubilee POM</li> <li>c. The loading or shipment / delivery date: 7/4/2020</li> <li>d. The date on which the documents were issued: 7/4/2020</li> <li>e. RSPO certificate number: RSPO 591224</li> <li>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): RSPO CPO-IP</li> <li>g. The quantity of the products delivered: 40830 kg</li> <li>h. Any related transport documentation: Weighbridge Ticket no. 009726</li> <li>i. A unique identification number: Contract Ref.: S/C-PSD/2006/CPO0962</li> </ul> <p>CSPK</p> <ul style="list-style-type: none"> <li>a. The name and address of the buyer: SD KCP Carey Island</li> <li>b. The name and address of the seller: Diamond Jubilee POM</li> <li>c. The loading or shipment / delivery date: 7/4/2020</li> <li>d. The date on which the documents were issued: 7/4/2020</li> </ul> | <p>Complied</p> |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|              |  | <ul style="list-style-type: none"> <li>j. RSPO certificate number: SPO 591224</li> <li>e. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): RSPO PK-IP</li> <li>f. The quantity of the products delivered: 27340 kg</li> <li>g. Any related transport documentation: Weighbridge Ticket no. 009727</li> <li>h. A unique identification number: Contract Ref.: S/C-PSD/2007/PK0863</li> </ul>  |                 |
| <p>3.8.9</p> | <p>Outsourcing Activities</p> <ul style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where the mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii) The mill shall ensure the following: <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process</li> </ul> </li> </ul> | <p>Sime Darby has established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019, Section 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsource processing activities like refining or crushing.</p> <p>The list of outsourced contractor was sighted, "list of stakeholder as at July 2020" include the transport contractor for CPO and PK Teo Tuan Kwee Sdn. Bhd.</p> <p>Sighted the sampled contracts between The Sime Darby Plantation Bhd. with Teo Tuan Kwee Sdn. Bhd. dated 19/12/2017 and extension email for contract extension dated 1/5/2020.</p> | <p>Complied</p> |

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|        | <p>which is communicated to the relevant contractor.</p> <p>The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p> |  |          |
| 3.8.10 | <p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>   | <p>Stated in the contract agreement between The Sime Darby Plantation Bhd. with Teo Tuan Kwee Sdn. Bhd. dated 19/12/2017, mentioned the site has legal ownership of all input material to be included in outsourced processes as per Annexure 5, RSPO Supply Chain Certification Standard.</p> <p>The mill ensures that an outsourced activity (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced process within Diamond Jubilee Palm Oil Mill, hence this requirement is not applicable.</p>  | Complied |
| 3.8.11 | <p>The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.</p>  | <p>Sime Darby has issued Memorandum to all contractors dated 26/6/2019. In the memorandum stated the contractors have to comply as follows;</p> <ul style="list-style-type: none"> <li>i. Comply with local legal requirements</li> <li>ii. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company</li> <li>iii. Having signed and enforceable agreement with the company</li> <li>iv. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary</li> <li>v. Having related working permits</li> <li>vi. Ensure PPE utilization by contractors' employee while being in the company premise.</li> </ul> | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|        |  |   |          |
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|        |  | Sighted memorandum acknowledgement by Teo Tuan Kwee Sdn. Bhd signed by company representative dated 8/8/2019.   |          |
| 3.8.12 | <p>Record keeping</p> <ul style="list-style-type: none"> <li>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> <li>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> <li>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>iv) For Mass Balance Module, the mill:             <ul style="list-style-type: none"> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</li> <li>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</li> </ul> </li> <li>• The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months.</li> </ul> | <p>Sighted memorandum acknowledgement by Teo Tuan Kwee Sdn. Bhd signed by company representative dated 8/8/2019.</p> <ul style="list-style-type: none"> <li>i) Sime Darby has established Standard Operating Procedure to maintain all records of evidence on the implementation of MSPO SCCS. The SOP was documented in Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records.</li> <li>ii) As stated in SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records all traceability records should be maintained at minimum period of 3 years.</li> <li>iii) DJPOM receives and process only certified FFB. Therefore, it uses the Identity Preserve supply chain system and module.</li> <li>iv) a. DJPOM has established the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.             <ul style="list-style-type: none"> <li>b. All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to conversion ratios of OER and KER as per sample records of Mill production report Jul 2019 – Jun 2020 and FFB summary Jul 2019 – Jun 2020.</li> <li>c. Positive stock deliveries maintained through the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. No short selling made by DJPOM.</li> </ul> </li> </ul> | Complied |

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|        | However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.   |  |          |
| 3.8.13 | <p><b>Extraction Rate</b><br/>           The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p> | <p>Addressed in the Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 17.0 Conversion Factor.</p> <p>Extraction rates were derived from actual production output that were measured daily by the mill and recorded in the daily production report. Actual rates for the period since last audit were available in the Mill production report Jul 2019 – Jun 2020.</p> <p>Volume estimates for next period were based on historical extractions and FFB projection from estates.</p>      | Complied |
| 3.8.14 | Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.  | Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.   | Complied |
| 3.8.15 | <p><b>Processing</b><br/>           For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>                               | <p>Addressed in the Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 7.0 receiving FFB at the mill and 9.0 Process Monitoring.</p> <p>Diamond Jubilee POM POM received only certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&amp;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> | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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| 3.8.16                                  | <p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p> | <p>i. Based on the downloaded transactions register from the certification unit's Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly.</p> <p>ii. Based on the announcement (transaction) summary, all the registrations were found to be in order.</p> | Complied       |
| 3.8.17                                  | <p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>   | <p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>  | Complied       |
| <b>General corporate communications</b> |   |   |                |
| 4.1                                     | <p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>  | <p>No off-product claim made by DJPOM and verified through document and site review (notice board, business card, shipping documentation, procurement/purchasing document and promotional material etc). Thus, this indicator is not applicable</p>   | Complied       |
| 4.2                                     | <p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p>   | <p>Not applicable as no off-product claim made by DJPOM as to date.</p>   | Not Applicable |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|  |  |   |                |
|--|--|---|----------------|
|  | <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p> |   |                |
| 4.3  | In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.  | Not applicable as no off-product claim made by DJPOM as to date.  | Not Applicable |
| 4.4  | Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.  | Not applicable as no off-product claim made by DJPOM as to date.  | Not Applicable |
| 4.5  | Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.  | No evidence of RSPO corporate logo used by DJPOM as verified through documentations and websites.                                   | Complied       |
| <b>Business to business communications</b> |  |   |                |
| 5.1  | Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.  | Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. | Complied       |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |   |  |                |
|---|---|--|----------------|
| 5.2                                       | When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.   | Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e. product/commodity with SCC model (CPO/Palm Kernel RSPO IP) and RSPO certificate number; RSPO 591224.  | Complied       |
| 5.3                                       | <p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p> | DJPOM is not under distributor or wholesaler category. Thus, this requirement is not applicable  | Not Applicable |
| <b>Business to consumer communication</b> |   |  |                |
| 6.1                                       | Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as  | Business to Business communication were made through the CSPO and CSPK trading contractual and transactions documentations between the mill and buyers. No further communications made by Diamond Jubilee POM for its raw products beyond its refinery and oleochemical plants buyers. | Not Applicable |



**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|     |   |  |                |
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|     | 'product-specific' claims. Product-specific claims are voluntary.   |  |                |
| 6.2 | Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.   | No business to consumer communication on product specific claim made. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM. | Not Applicable |
| 6.3 | When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.  | No business to consumer communication on product specific claim made. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM. | Not Applicable |
| 6.4 | Business to consumer communication shall not include information about the claimant's RSPO membership status.   | No business to consumer communication on product specific claim made. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM. | Not Applicable |
| 6.5 | Members shall not communicate to consumers' information about their suppliers' RSPO membership status.  | No business to consumer communication on product specific claim made. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM. | Not Applicable |
| 6.6 | Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.  | No business to consumer communication on product specific claim made. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM. | Not Applicable |
| 6.7 | Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.   | No business to consumer communication on product specific claim made. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM. | Not Applicable |
| 6.8 | RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the | No business to consumer communication on product specific claim made. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM. | Not Applicable |

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|   | <p>trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a>.</p> |   |                       |
| <p><b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b></p> |  |   |                       |
| <p><b>Certified oil palm content (IP)</b></p>                               |  |   |                       |
|   | <p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>   | <p>Diamond Jubilee POM is producing crude palm product and does not involved in any labelling of end product.</p> | <p>Not Applicable</p> |
|   | <p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>   | <p>Diamond Jubilee POM is producing crude palm product and does not involved in any labelling of end product.</p> | <p>Not Applicable</p> |
|   | <p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be</p>  | <p>Diamond Jubilee POM is producing crude palm product and does not involved in any labelling of end product.</p> | <p>Not Applicable</p> |

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|                                     | covered by the purchase of RSPO Credits of equivalent volume.   |  |                |
| <b>Labelling and trademark (IP)</b> |   |  |                |
|                                     | <p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul> | Diamond Jubilee POM is producing crude palm product and does not involved in any labelling of end product. | Not Applicable |
| <b>Messaging (IP)</b>               |   |  |                |
|                                     | <p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>   | Diamond Jubilee POM is producing crude palm product and does not involved in any labelling of end product. | Not Applicable |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|  | <ul style="list-style-type: none"> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul> <p>References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</p> |  |          |
| <p><b>Principle 4: Respect community and human rights and deliver benefit</b><br/>         Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p> |  |  |          |
| <p><b>Criteria 4.1</b><br/>         The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>   |  |  |          |
| 4.1.1  | <p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>  | <p>DJPOM has the implemented a Sime Darby’s Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance to the United Nations declaration on Human Rights Defender.</p> <p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights on 6/7/2020 for Diamond Jubilee POM workers.</p> | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |   |   |          |
|---|---|---|----------|
| 4.1.2   | The unit of certification does not instigate violence or use any form of harassment in their operations.  | <p>DJPOM has implemented Group Sustainability and Quality Policy Statement dated 02 Dec 2019 where the management is committed to contributing to a better society:</p> <ol style="list-style-type: none"> <li>1. Respecting, upholding &amp; no-exploitation of fundamental human rights.</li> <li>2. Providing safe and healthy workplaces, and protecting workers' welfare.</li> <li>3. Engaging and empowering communities.</li> </ol> <p>This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.</p> | Complied |
| <p><b>Criteria 4.2</b><br/>         There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p> |   |   |          |
| 4.2.1   | <b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. | <p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</p> <p>Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.</p>   | Complied |
| 4.2.2   | Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.   | Verification with stakeholders confirmed that the procedures were well understood in case of any necessary.   | Complied |
| 4.2.3   | The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.   | Neither any complaints nor land dispute occurred in the SOU 18 Certification Unit at the time of audit as verified through stakeholder consultation.  | Complied |
| 4.2.4   | The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or  | The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone   | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |   |   |          |
|---|---|---|----------|
|   | groups to support them and/or act as observers, as well as the option of a third-party mediator.  | heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.  |          |
| <b>Criteria 4.3</b>   |   |   |          |
| The unit of certification contributes to local sustainable development as agreed by local communities.  |   |   |          |
| 4.3.1   | Contributions to community development that are based on the results of consultation with local communities are demonstrated.   | <p>SOU 18 demonstrated participation in community development towards local communities through various contributions as per sample sighted as following:</p> <ul style="list-style-type: none"> <li>- DJPOM: Receiving industrial visit program by UTHM student, date: 15/10/2019</li> <li>- DJPOM: Participation in Anti-Drugs Campaign &amp; Stamp Week by SMK Simpang Bekoh; Date: 25/4/2019</li> <li>- DJ Estate: Monthly contribution of milk powder to SJKT student; 3600g/month</li> <li>- DJ Estate: Clearance of estate area in 2019 for SJKT football field use</li> </ul>   | Complied |
| <b>Criteria 4.4</b>   |   |   |          |
| Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent. |   |   |          |
| 4.4.1   | <b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available. | <p>Mill located within Diamond Jubilee Estate Lot # 228; area: 470.0416 ha; Land title # 20102; District: Jasin, Sub-district: Mukim Rim.</p> <p>Diamond Jubilee Estate hold a total of 32 land titles as per sample sighted as following:</p> <ul style="list-style-type: none"> <li>- Title # 1; Lot # 235; District: Jasin; Sub-district: Mukim Rim; Area: 1.4113 ha</li> <li>- Title # 1136; Lot # 1557; District: Jasin; Sub-district: Mukim Ayer Panas; Area: 0.6149 ha</li> </ul> <p>Bukit Asahan Estate hold a total of 44 land titles as per sample sighted as following:</p> <ul style="list-style-type: none"> <li>- Title # 22022; Lot # 49; District: Jasin; Sub-district: Pekan Asahan Sek. II; Area: 138.6046 ha</li> <li>- Title # 216; Lot # 50; District: Jasin; Sub-district: Mukim Chabau; Area: 2.2942 ha</li> </ul> | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |  |  |          |
|-------|--|--|----------|
| 4.4.2 | Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:<br>a) Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making | There is no land dispute recorded. This was verified through stakeholders' consultation.<br>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes. | Complied |
|       | b) Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken   | There is no land dispute recorded. This was verified through stakeholders' consultation.<br>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes. |          |
|       | c) Evidence that the legal, economic, environmental and social implications of 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 unit of certification's title, concession or lease on the land.   | There is no land dispute recorded. This was verified through stakeholders' consultation.<br>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes. |          |
| 4.4.3 | <b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).   | There is no land dispute recorded. This was verified through stakeholders' consultation.<br>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes. | Complied |
| 4.4.4 | All relevant information is available in appropriate forms and languages, including assessments of   | There is no land dispute recorded. This was verified through stakeholders' consultation.   | Complied |

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|   | impacts, proposed benefit sharing, and legal arrangements.  | In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.  |          |
| 4.4.5   | <b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.  | There is no land dispute recorded. This was verified through stakeholders' consultation.<br>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.  | N/A      |
| 4.4.6   | There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.   | There is no land dispute recorded. This was verified through stakeholders' consultation.<br>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.  | N/A      |
| <b>Criteria 4.5</b>   |   |   |          |
| No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions. |   |   |          |
| 4.5.1   | <b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.  | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU 18. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| 4.5.2   | <b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU 18. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |



**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |  |   |          |
|-------|--|---|----------|
|       | independent advice through a documented, long-term and two-way process of consultation and negotiation.  |   |          |
| 4.5.3 | Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU 18. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| 4.5.4 | To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.   | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU 18. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| 4.5.5 | Evidence is available that the affected communities and rights holders have had the option to access to information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.   | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU 18. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| 4.5.6 | Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.   | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU 18. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |   |   |          |
|---|---|---|----------|
| 4.5.7   | New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.                                      | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU 18. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| 4.5.8   | <b>(C)</b> Newlands are not acquired in areas inhabited by communities in voluntary isolation.  | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU 18. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| <b>Criteria 4.6</b>   |   |   |          |
| 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. |   |   |          |
| 4.6.1   | <b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.   | There is no customary rights in SOU 18. Land belonged to Sime Darby since the first planting year.  | Complied |
| 4.6.2   | <b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. | There is no customary rights in SOU 18. Land belonged to Sime Darby since the first planting year.  | Complied |
| 4.6.3   | Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.   | There is no customary rights in SOU 18. Land belonged to Sime Darby since the first planting year.  | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|  |  |   |          |
|--|--|---|----------|
| 4.6.4  | The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.  | There is no customary rights in SOU 18. Land belonged to Sime Darby since the first planting year.  | Complied |
| <b>Criteria 4.7</b>  |  |   |          |
| Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements. |  |   |          |
| 4.7.1  | <b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.  | DJPOM 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. | Complied |
| 4.7.2  | <b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.   | There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.                                  | Complied |
| 4.7.3  | Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.  | DJPOM 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. | Complied |
| <b>Criteria 4.8</b>  |  |   |          |
| The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.   |  |   |          |
| 4.8.1  | Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. | DJPOM 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. | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |  |  |          |
|---|--|--|----------|
| 4.8.2   | <b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. | There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.   | Complied |
| 4.8.3   | Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4)   | DJPOM 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.  | Complied |
| 4.8.4   | For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)   | There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.   | Complied |
| <p><b>Principle 5: Support smallholder inclusion</b><br/>         Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p> |  |  |          |
| <p><b>Criteria 5.1</b><br/>         The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>               |  |  |          |
| 5.1.1   | Current and previous period prices paid for FFB are publicly available and accessible by smallholders.   | Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region. The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list. | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |  |  |          |
|-------|--|--|----------|
| 5.1.2 | <b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders (at least once a year or upon request).   | The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list.  | Complied |
| 5.1.3 | <b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.  | The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list.  | Complied |
| 5.1.4 | <b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. | The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list.  | Complied |
| 5.1.5 | Contracts are fair, legal and transparent and have an agreed timeframe.  | The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU.<br><br>Contracts for contractor, vendors and service supplier are fair, legal and transparent and have an agreed timeframe as per sample sighted in contract between DJPOM and Teras Integrasi Sdn Bhd, doc no 4300490296, 9/12/2019 for Maintenance, Repair and Overhaul (MRO) contract for truck scale system at DJPOM. | Complied |
| 5.1.6 | <b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.  | Payment made within 30 days upon receipt of supplier's. Payment was made through the financial department at head office. Sampled payment sighted as follows:<br><br>Purchase Order no.: 4300490296<br>Invoice no: 07121<br>Invoice date: 17/1/2020<br>Payment in MEX system doc no.: 1600004057<br>Payment date: 28/1/2020  | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |  |   |          |
|---|--|---|----------|
| 5.1.7   | Weighing equipment is verified by an independent third party on a regular basis (this can be government).  | Weighbridge conducted 14/1/2020 by Teras Integrasi Sdn Bhd as per sighted records of latest calibration by Metrology Corporation Malaysia Sdn. Bhd. refer certificate no. B1566289 and safety sticker no. 2.1K QC04982.   | Complied |
| 5.1.8   | The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. | No independent smallholders within Diamond Jubilee POM certification unit   | Complied |
| 5.1.9   | <b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.   | Addressed in Standard Operation Manual; Date: 1/11/2008 that documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) for grievance handling.<br>No independent smallholders within Diamond Jubilee POM certification unit   | Complied |
| <b>Criteria 5.2</b>   |  |   |          |
| The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains. |  |   |          |
| 5.2.1   | The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.   | Diamond Jubilee POM processed own crops only and no FFB sourced from third party. All FFB sent to Diamond Jubilee POM are from own supply base. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.<br><br>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB. | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |  |  |          |
|-------|--|--|----------|
| 5.2.2 | The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder or RSIS). | <p>Diamond Jubilee POM processed own crops only and no FFB sourced from third party. All FFB sent to Diamond Jubilee POM are from own supply base. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB &amp; CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p> | Complied |
| 5.2.3 | Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.  | <p>Diamond Jubilee POM processed own crops only and no FFB sourced from third party. All FFB sent to Diamond Jubilee POM are from own supply base. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB &amp; CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p> | Complied |
| 5.2.4 | <b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.  | <p>Diamond Jubilee POM processed own crops only and no FFB sourced from third party. All FFB sent to Diamond Jubilee POM are from own supply base. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB &amp; CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p>   | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |   |  |          |
|---|---|--|----------|
|   |   | As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.   |          |
| 5.2.5   | The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.  | <p>Diamond Jubilee POM processed own crops only and no FFB sourced from third party. All FFB sent to Diamond Jubilee POM are from own supply base. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB &amp; CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p> | Complied |
| <p><b>Principle 6: respect workers’ rights and conditions</b><br/>         Protect workers’ rights and ensure safe and decent working conditions.</p> |   |  |          |
| <p><b>Criteria 6.1</b><br/>         Any form of discrimination is prohibited.</p>   |   |  |          |
| 6.1.1   | <b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. | DJPOM has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02nd December 2019. The policy shall be guided by the commitments spelt out in the Company’s in Human Rights Charter (HRC) 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 |



**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |   |  |          |
|-------|---|--|----------|
| 6.1.2 | <b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. | Migrant workers are recruited with (2 +1) and 3 years contract. Local workers are on a long-term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, subsidized water and electric supplier (connect to national water and electricity supply) and medical care (panel clinic) are given to all employees without discrimination.<br><br>Foreign migrant workers. Refer to Letter of Employment, Employment Contract para" 14 – Annual leave: 14 days for < 5 years and 16 days for > 5 years.<br><br>Overtime paid as per Employment Act 1995 (EA). Sampled workers are as 6.5.1.  | Complied |
| 6.1.3 | The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.  | 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. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.<br><br>Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste as per sample of DJPOM new recruitment for following:<br>- Employee ID # 150123; Post: Office operator; Date joined: 2/5/2019; Date confirmed: 2/1/2020<br>- Employee ID # 158588; Post: General worker; Date joined: 18/5/2019; Date confirmed: 2/1/2020 | Complied |
| 6.1.4 | Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.                            | There is no pregnancy test conducted in SOU 18. Confirmed through the interview session to workers, Medical Assistant and Gender Committee Minute of Meeting.  | Complied |
| 6.1.5 | <b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.   | The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. DJPOM has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management   | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |  |  |          |
|---|--|--|----------|
|   |  | <p>(PSQM) Department. It explained the types of gender-based violence &amp; grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management.</p> <p>The last meeting were conducted by Diamond Jubilee POM dated on 3/8/2019 while for Bukit Asahan Estate Meeting dated on 12/6/2020.</p> <p>No sexual harassment case been report and confirmed through interviewed with the chairman and female workers.</p>  |          |
| 6.1.6   | There is evidence of equal pay for the same work scope.  | <p>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. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.</p>   | Complied |
| <p><b>Criteria 6.2</b><br/>           Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p> |  |  |          |
| 6.2.1   | <b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. | <p>All the workers are under direct employment and some electrical works are under contractor workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract in compliance with permits as following:</p> <ul style="list-style-type: none"> <li>- JTKSM Overtime Limit Permit Ref. # BHG.PU/9/134 JLD 9 (11); Date: 27/3/2017</li> <li>- JTKSM Salary Deduction Permit Ref. # JTKS(E)6/115 Jld 36-20 (2); Date: 30/5/2018 for PTPTN &amp; Tabung Haji deductions</li> <li>- JTKSM Salary Deduction Permit Ref. # JTKS(E)6/115 Jld 36-20 (2); Date: 30/5/2018 for Electrical bills deductions</li> </ul> | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |   |  |          |
|-------|---|--|----------|
| 6.2.2 | <p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> | <p>As per Inter-Office Mail from Sime Darby Plantation’s Head, HR Upstream to Senior Managers/Managers Estate &amp; Mill for all Northern Region, Central East Region, Central West Region on Implementation of Revised Workers’ Contracts and Register of Maternity Leave and Allowances; Date: 3/12/2019.</p> <p>All workers work agreement were also based on MAPA Circular No. 1/2020; Date: 14/1/2020; Minimum Wages Order 2020 (MWO 2020) where the order provides for the minimum wages rates payable to an employee who works in a place of employment in any City Council or Municipal Council area as specified in the schedule.</p>   | Complied |
| 6.2.3 | <p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p>   | <p>DJPOM as per sample workers’ payslip for March, April &amp; May 2020 sighted as following:</p> <ul style="list-style-type: none"> <li>- Employee ID # 151747; Nationality: Malaysia; Post: AP; Date joined: 10/6/2019</li> <li>- Employee ID # 145964; Nationality: Malaysia; Post: AP; Date joined: 12/6/2015</li> <li>- Employee ID # 153887; Nationality: Malaysia; Post: Weighbridge Operator; Date joined: 10/6/2019 ## 17/3 10:21pm (exceed 10)</li> <li>- Employee ID # 062012; Nationality: Indonesia; Post: Process operator; Date joined: 9/2/2011## Entering 10<sup>th</sup> year 8/2/2020; FW retention bonus (w.e.f. 1/7/2016; ref. # IOM WMU/2016/06/PG/005) paid 8<sup>th</sup> year only on 12/2/20??##</li> <li>- Employee ID # 138485; Nationality: Indonesia; Post: Process operator; Date joined: 18/12/2017## Entering 10<sup>th</sup> year 8/2/2020</li> </ul> <p>Welch Estate as per sample workers’ payslip for March, April &amp; May 2020 sighted as following:</p> <ul style="list-style-type: none"> <li>- Employee ID # 073493; Nationality: Malaysia; Post: Harvesting Mandore; Date joined: 19/10/2011</li> <li>- Employee ID # 139064; Nationality: Indonesia; Post: Harvester; Date joined: 10/1/2018</li> </ul> | OFI      |

**RSPO P&C Public Summary Report  
Revision 10 (Mar 2020)**

|  |  |  |  |
|--|--|--|--|
|  |  | <ul style="list-style-type: none"> <li>- Employee ID # 146650; Nationality: Indian; Post: Harvester; Date joined: 1/11/2018</li> <li>- Employee ID # 157559; Nationality: Indonesia; Post: General worker; Date joined: 13/1/2020</li> <li>- Employee ID # 119852; Nationality: India; Post: Sprayer; Date joined: 15/2/2016</li> </ul> <p>Diamond Jubilee Estate as per sample workers' payslip for March, April &amp; May 2020 sighted as following:</p> <ul style="list-style-type: none"> <li>- Employee ID # 012642; Nationality: Malaysia; Post: Harvesting Mandore; Date joined: 8/5/1992</li> <li>- Employee ID # 066834; Nationality: India; Post: Field Worker; Date joined: 19/5/2011</li> <li>- Employee ID # 077858; Nationality: India; Post: General Worker; Date joined: 24/1/2012</li> <li>- Employee ID # 108661; Nationality: India; Post: Tractor Driver; Date joined: 1/12/2014</li> <li>- Employee ID # 118702; Nationality: Nepal; Post: Sprayer; Date joined: 14/12/2015</li> </ul> <p>Bukit Asahan Estate as per sample workers' payslip for March, April &amp; May 2020 sighted as following:</p> <ul style="list-style-type: none"> <li>- Employee ID # 051033; Nationality: Malaysia; Post: Gardener; Date joined: 15/11/1988</li> <li>- Employee ID # 156507; Nationality: Indonesia; Post: Harvester; Date joined: 26/11/2019</li> <li>- Employee ID # 149506; Nationality: Indonesia; Post: General Worker; Date joined: 26/3/2019</li> </ul> |  |
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**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |   |  |          |
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|       |   | <ul style="list-style-type: none"> <li>- Employee ID # 103824; Nationality: India; Post: General Worker; Date joined: 15/7/2014</li> <li>- Employee ID # 117086; Nationality: Bangladesh; Post: Loose Fruit Collector; Date joined: 19/9/2015</li> </ul> <p>An OFI has been raised on the following:</p> <ul style="list-style-type: none"> <li>- Diamond Jubilee Palm Oil Mill: Interview session with the female weighbridge operator found that sometimes she needs to stay late to wait for FFB received which might exceed nightshift hours</li> <li>- Diamond Jubilee Estate: Salary deduction for electricity shown as "other loan/employees deduction" in the workers' payslip</li> </ul>  |          |
| 6.2.4 | <p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years)is allowed to upgrade the infrastructure.</p> | <p>The basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity and water were connected with the national infrastructure facilities. The us age of electricity and water is provided with subsidize rate as per employment contract. Seen the Budget for housing repairs, sanitation, garden upkeep and CAPEX from all operating units.</p> <p>Seen the record for weekly linesite inspection done by Medical Assisant in Weekly basis. For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes).</p> <p>During the field assessment, it was observed that the housing area in favourable sanitation condition as reflected in the line-site inspection.</p> | Complied |
| 6.2.5 | <p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p>  | <p>The housing area were located near the main road where the accessibility to the grocery and shops is available in housing area.</p>   | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |   |   |          |
|-------|---|---|----------|
| 6.2.6 | A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. | SOU 18 conducted the Prevailing Wage Assessment and calculated individual local and foreign workers current salary including non-monetary benefit given average DJPOM for local worker RM: 1,769.50; FW: RM1,920.41. DLW assessment conducted by Group Sustainability & Quality Manager (GSQM) Sime Darby Plantation. | Complied |
|-------|---|---|----------|

**PROCEDURAL NOTE:**

RSPO STANDARD STANDING COMMITTEE  
 14th of October 2019

**STATEMENT FROM THE RSPO STANDARD STANDING COMMITTEE REGARDING THE INDICATOR 6.2.6 ON DECENT LIVING WAGE**

With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavor to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist<sup>1</sup>

***Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.***

In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks<sup>1</sup>. These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.

***For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage<sup>1</sup>.***

Once the benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

- Updated assessment on prevailing wages and in-kind benefits
- There is annual progress on the implementation of living wages
- Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment
- The UoC may choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.

<sup>1</sup> As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam. These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate.

<sup>2</sup> Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country.

<sup>3</sup> RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country.

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| 6.2.7 | Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal. | There are no casual workers hired in SOU 18. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full time employment or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2 | Complied |
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**Criteria 6.3**  
 The unit of certification 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.

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| 6.3.1 | <b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) | The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: | Complied |
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**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |  |   |          |
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|       | is available and is explained to all workers, in language that they understand, and is demonstrably implemented.   | <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>• Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> </ul> <p>Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p> <p>During the interview with workers, there are no evidence received that there are restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</p> <p>Sighted the letter from NUPW to Estate Manager, Biennial General Meeting on 03/03/2020 and seminar for estate union committee members to be held on 12<sup>th</sup> &amp; 13<sup>th</sup> March 2020.</p> |          |
| 6.3.2 | Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request. | <p>Minit Mesyuarat Antara Pihak Ladang Dan Wakil NUPW 2020 dated 05/06/2020 involved the representative from employer and employee available. Issues discussed as below:</p> <ol style="list-style-type: none"> <li>1. The salary for March 2020 for DJ POM is less but being explained by AAO on the calculation from MAPA to workers representative.</li> <li>2. Changes on the crop processing time. This is because of the crop receive late and mill want to optimize the working time.</li> </ol>   | Complied |
| 6.3.3 | Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.          | <p>Based on the worker’s interview, the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation and appointment letter sighted. The selection also based on the election meeting.</p>  | Complied |



| <b>Criteria 6.4:</b><br>Children are not employed or exploited. |   |   |          |
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| 6.4.1   | A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. | The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:<br><br>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: <ul style="list-style-type: none"> <li>• Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>• Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>• Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations.</li> <li>• Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities.</li> <li>• Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use.</li> <li>• Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees.</li> <li>• Protecting the Rights of Children: We seek to promote the wellbeing of children, and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.</li> </ul> | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |  |  |          |
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|   |  | <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour &amp; protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.</p>   |          |
| 6.4.2   | <p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p>  | <p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liason &amp; Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>   | Complied |
| 6.4.3   | <p><b>(C)</b> Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.</p>  | <p>There is no young worker employed in SOU 18 certification unit.</p>   | Complied |
| 6.4.4   | <p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> | <p>The unit of certification has communicated the Human Right Charter, Social Policy and Vendor COBC through the stakeholder meeting and muster briefing.</p>  | Complied |
| <p><b>Criteria 6.5:</b><br/>           There is no harassment or abuse in the workplace, and reproductive rights are protected.</p> |  |  |          |
| 6.5.1   | <p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p>  | <p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and</li> </ul> | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |   |  |          |
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|   |   | <p>to provide support for victims.</p> <ul style="list-style-type: none"> <li>• Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.</li> </ul> <p>The policy was communicated through the Gender Committee meeting conducted quarterly.</p>   |          |
| 6.5.2   | <b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.                     | DJPOM has implemented Social Policy, Gender 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 during morning muster and the policies was displayed at the notice board outside the office. | Complied |
| 6.5.3   | Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.           | SOU 22 has established a new form of Assessment for New Mothers which will be conducted by the Gender Committee Members of each operating unit for any new mothers within their respective sites. The assessment done for new mothers with infants of 24 months or younger. Sighted sample latest assessment done by Bukit Asahan Estate dated on 4/7/2020.  | Complied |
| 6.5.4   | A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. | Gender committee has been formed in each unit for the medium of sexual harassment grievances by female.  | Complied |
| <b>Criteria 6.6:</b>                              |   |  |          |
| No forms of forced or trafficked labour are used. |   |  |          |
| 6.6.1   | <b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:   | The recruitment cost were declared by the labour agent from source country for the applicable fees. Sampled for Tenaga Kerja Indonesia (TKI) Kepada Agensi (PL) Dan Sponsor (PL) for Indonesia effective date on 01/06/2017 (IDR 6,150,000) and  | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |  |   |          |
|-------|--|---|----------|
|       | <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> | <p>Amoza Travels for India (INR 50000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.</p> <p>Passport was kept by the management voluntarily. There is agreement letter signed by worker and employer on the safekeeping passport at office. If the workers want to obtain the passport for own usage they can anytime request for it.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p> <p>Overtime was given voluntarily. Sighted the overtime request form where employer offer work to worker after working hour/rest day/public holiday.</p> <p>The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> <li>1. The company is not satisfied with your performance</li> <li>2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term.</li> <li>3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime.</li> <li>4. You have breached any express or implied terms of your employment.</li> <li>5. Fail medical examination based on FOMEMA result.</li> <li>6. Involved in any act that will affect the reputation of the company.</li> <li>7. No penalty, debt bondage and withholding of wages been imposed to worker if they want to resign. This has been confirmed through the interview and employment contract signed.</li> </ol> |          |
| 6.6.2 | <p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p>  | <p>DJPOM has implemented a Sime Darby’s Human Rights Charter on where they committed as below:</p> <p>a. Providing equal opportunity</p>  | Complied |

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|   |   | <p>b. Respecting freedom of association<br/> c. Eradicating any form of exploitation<br/> d. Ensuring favorable working conditions<br/> e. Enhancing Safety and Health</p> <p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. For e.g.: All the workers have provided with induction training in Sua Betong Estate or based estate during their arrival to Malaysia.</p>  |                 |
| <p><b>Criteria 6.7:</b><br/> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p> |   |   |                 |
| <p>6.7.1</p>  | <p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> | <p>The OSH policy is well briefed to all workers. Interview with workers reveal that they understand the policy and the importance of safety at work at Diamond Jubilee POM and all estates.</p> <p><u>Diamond Jubilee POM:</u><br/> OSH meeting conducted on quarterly basis. The OSH meeting minutes available for year 2020 dated 13/04/2020 and 13/01/2020 and the meeting has been adequately covered. Appointed letter for OSH Committee member available dated 1/01/2019 with no changes/revision of committee members.</p> <p><u>Welch Estate:</u><br/> OSH meeting conducted on quarterly basis. The OSH meeting minutes available for year 2020 dated 26/06/2020 &amp; 10/01/20 the meeting has been adequately covered.</p> <p><u>Diamond Jubilee Estate:</u><br/> OSH meeting conducted on quarterly basis. The OSH meeting minutes available for year 2020 dated 21/01/2020 and 21/05/2020 and the meeting has been adequately</p> | <p>Complied</p> |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |  |  |                |
|-------|--|--|----------------|
|       |  | <p>covered. Appointed letter for OSH Committee member available dated 1/06/2020 with no changes/revision of committee members.</p> <p><u>Bukit Asahan Estate:</u><br/>         OSH meeting conducted on quarterly basis. The OSH meeting minutes available for year 2020 dated 06/02/2020 and 06/05/2020 and the meeting has been adequately covered. Appointed letter for OSH Committee member available accordingly for committee members.</p>   |                |
| 6.7.2 | <p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> | <p>Accident and emergency procedures have been communicated to employees, contractors and visitors.</p> <ol style="list-style-type: none"> <li>1. Diamond Jubilee POM: Fire evacuation drill was last conducted on 23/07/2019 to test the state of readiness during emergency situation.</li> <li>2. Welch Estate – Fire evacuation drill was last conducted on 14/10/2019 to test the state of readiness during emergency situation.</li> <li>3. Diamond Jubilee Estate – Fire evacuation drill was last conducted on 10/02/2020, to test the state of readiness during emergency situation.</li> <li>4. Bukit Asahan Estate – Fire evacuation drill was last conducted on 26/07/2020 to test the state of readiness during emergency situation.</li> </ol> <p>Accident and emergency procedures are in English/Bahasa Malaysia and this is understood by the responsible workers, staff or executives involved in the operation. Good understanding level observed among the workers.</p> <p>Training for First Aid is conducted on annual basis. Adequate first aiders trained available. E.g. First Aid Refresher Training at Welch Estate was conducted on 8/10/19. At Diamond Jubilee Estate the first aid training was conducted on 11/02/2020. As for the POM, the First Aid Training was conducted on 11/07/19. Verified also the first aid training at Bukit Asahan Estate been conducted on 15/05/20.</p> | Non-compliance |

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|  |  | <p>First aid equipment is available at worksites. During the site visit there is evident that First Aid Box is available at the relevant area.</p> <p>Fire extinguisher (ABC Powder) assessed during the site observation are available and within the expiry date.</p> <p>Portable emergency eye wash &amp; shower facility available at chemical store, workshop, mixing area and laboratory.</p> <p>Emergency procedures were not fully effective. The following lapses were identified:<br/>         Diamond Jubilee POM: Sighted 2 expired items i.e. Analgesic cream expired on 7/6/19 &amp; Antiseptic cream expired on 1/7/20 in the First Aid Kit No. 5 sampled near the Workshop Area. Further verification indicates the monthly inspection record for First Aid Kit No. 5 does not capture on the expired items details.</p> <p>Diamond Jubilee Estate:</p> <p>a) Sighted 2 expired elastic bandages dated 30/03/20 &amp; 30/06/20 kept in the Manuring Mandor First Aid Kit. Further verification indicates the monthly inspection record for Manuring Mandor First Aid Kit does not capture on the expired items details.</p> <p>b) Emergency eye wash located at the pesticide mixing area was tested malfunction.</p> <p>c) Bukit Asahan Estate: Pesticide mixing area emergency eye wash water in the bottle was found contaminated with unwanted substances.</p> <p>Thus, a <b>Minor NC</b> has been raised for above matters.</p> <p><u>Diamond Jubilee POM:</u></p> <p>1 case reported with JKPP 6 submission. Seen the JKPP 6 submission report dated 6/11/19. Verified that the Incident Investigation Report been raised according including review of existing HIRADC accordingly dated 3/12/19 for Boiler Station. DOSH visit been recorded in the DOSH log book. Seen the latest DOSH visit</p> |  |
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**RSPO P&C Public Summary Report  
Revision 10 (Mar 2020)**

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|  |  | <p>recorded dated 29/6/2020 and comments highlighted by DOSH was noted and action taken accordingly.</p> <p><u>Welch Estate:</u><br/>So far no incidents lead to submission of JKPP 6 for year 2020. Verified for first aid cases and MC cases with &lt; 4 days, the necessary investigation been conducted accordingly using the Incident Notification Report. Verified that that proper accident investigation was made and on the issues including review of the existing HIRADC. DOSH visit been recorded in the DOSH log book. Seen the latest DOSH visit recorded dated 14/1/20 and comments highlighted by DOSH was noted and action taken accordingly.</p> <p><u>Diamond Jubilee Estate:</u><br/>There is 1 incident lead to submission of JKPP 6 dated 25/06/20. Verified the necessary investigation been conducted accordingly using the Incident Notification Report and JKPP 6. Verified that that proper accident investigation was made and, on the issues, including review of the existing HIRARC. DOSH visit been recorded in the DOSH log book. Seen the latest DOSH visit recorded dated 7/01/20 and comments highlighted by DOSH was noted and action taken accordingly. JKPP 8 was sent to DOSH on 15/01/2020.</p> <p><u>Bukit Asahan Estate:</u><br/>Sampled an incident lead to submission of JKPP 6 for year 2020 dated 7/3/2020. Verified the necessary investigation been conducted accordingly using the Incident Notification Report. Verified that that proper accident investigation was made on the issues including review of the existing HIRARC e.g. for harvesting process HIRARC review. JKPP 8 was sent to DOSH on 15/01/2020.</p> |  |
|--|--|--|--|



| <p>6.7.3</p>           | <p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> | <p>All workers were provided with appropriate PPE where the cost was bared by the management. Interviews conducted during the site visit at the Mill and Estate showed understanding and approval from the workers that:</p> <p>a) The management bares the cost of all PPEs and the workers are entitled to valid PPE b) The importance of using required PPE at all times during work c) Proper storage and disposal methods of PPE.</p> <p>Sampled issuance of PPE are as below :-</p> <table border="1" data-bbox="958 619 1547 1391"> <thead> <tr> <th colspan="3">POM</th> </tr> <tr> <th>Name</th> <th>PPE</th> <th>Issue Date</th> </tr> </thead> <tbody> <tr> <td>Gunasekaran</td> <td>Safety Shoe</td> <td>27/6/2020</td> </tr> <tr> <td>Ganesan</td> <td>Ear plug</td> <td>29/1/2020</td> </tr> <tr> <td>Bathumalai</td> <td>Safety Helmet</td> <td>9/6/2020</td> </tr> <tr> <td>Mahet</td> <td>Safety Shoe</td> <td>20/6/2020</td> </tr> <tr> <th colspan="3">Welch Estate</th> </tr> <tr> <th>Name</th> <th>PPE</th> <th>Issue Date</th> </tr> <tr> <td>Shahrul</td> <td>Safety Cotton Glove</td> <td>2/6/20</td> </tr> <tr> <td>Zamri</td> <td>Safety Rubber Boot</td> <td>2/6/20</td> </tr> <tr> <td>Maksum</td> <td>Harvesting Sickle</td> <td>6/6/20</td> </tr> <tr> <th colspan="3">Diamond Jubilee Estate</th> </tr> <tr> <th>Name</th> <th>PPE</th> <th>Issue Date</th> </tr> </tbody> </table> | POM |  |  | Name | PPE | Issue Date | Gunasekaran | Safety Shoe | 27/6/2020 | Ganesan | Ear plug | 29/1/2020 | Bathumalai | Safety Helmet | 9/6/2020 | Mahet | Safety Shoe | 20/6/2020 | Welch Estate |  |  | Name | PPE | Issue Date | Shahrul | Safety Cotton Glove | 2/6/20 | Zamri | Safety Rubber Boot | 2/6/20 | Maksum | Harvesting Sickle | 6/6/20 | Diamond Jubilee Estate |  |  | Name | PPE | Issue Date | <p>Complied</p> |
|------------------------|--|---|-----|--|--|------|-----|------------|-------------|-------------|-----------|---------|----------|-----------|------------|---------------|----------|-------|-------------|-----------|--------------|--|--|------|-----|------------|---------|---------------------|--------|-------|--------------------|--------|--------|-------------------|--------|------------------------|--|--|------|-----|------------|-----------------|
| POM                    |  |   |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |
| Name                   | PPE  | Issue Date  |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |
| Gunasekaran            | Safety Shoe  | 27/6/2020   |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |
| Ganesan                | Ear plug   | 29/1/2020   |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |
| Bathumalai             | Safety Helmet  | 9/6/2020  |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |
| Mahet                  | Safety Shoe  | 20/6/2020   |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |
| Welch Estate           |  |   |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |
| Name                   | PPE  | Issue Date  |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |
| Shahrul                | Safety Cotton Glove  | 2/6/20  |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |
| Zamri                  | Safety Rubber Boot   | 2/6/20  |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |
| Maksum                 | Harvesting Sickle  | 6/6/20  |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |
| Diamond Jubilee Estate |  |   |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |
| Name                   | PPE  | Issue Date  |     |  |  |      |     |            |             |             |           |         |          |           |            |               |          |       |             |           |              |  |  |      |     |            |         |                     |        |       |                    |        |        |                   |        |                        |  |  |      |     |            |                 |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |  |   |                    |            |  |          |
|-------|--|---|--------------------|------------|--|----------|
|       |  | Rahamat   | Apron              | 2/5/20     |  |          |
|       |  | Bahadur   | Safety Rubber Boot | 3/3/20     |  |          |
|       |  | Raj Kumar   | Respirator 3M      | 2/5/20     |  |          |
|       |  | Bukit Asahan Estate   |                    |            |  |          |
|       |  | Name  | PPE                | Issue Date |  |          |
|       |  | Hariyanto   | Handglove          | 6/6/20     |  |          |
|       |  | Abshishek   | Apron              | 8/5/20     |  |          |
|       |  | Munawar   | Shoe               | 20/3/20    |  |          |
| 6.7.4 | All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law. | <p>Medical care and accident insurance is provided to all the employees. Workers are covered under SOCSO scheme. Seen the SOCSO scheme payment schedule at mill/estates as follows:</p> <p>a) Diamond Jubilee POM: Sampled Sosco Jadual Caruman for April 2020, May 2020 &amp; June 2020.</p> <p>b) Welch Estate: Sampled Sosco Jadual Caruman for April 2020, May 2020 &amp; June 2020.</p> <p>c) Diamond Jubilee Estate: Sampled Sosco Jadual Caruman for April 2020, May 2020 &amp; June 2020.</p> <p>d) Bukit Asahan Estate: Sampled Sosco Jadual Caruman for April 2020, May 2020 &amp; June 2020.</p> <p>Above Sosco submission were done using the Borang 8A. Details of the Employer and worker's details been available accordingly.</p> |                    |            |  | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|  |  |  |                |
|--|--|--|----------------|
| 6.7.5  | Occupational injuries are recorded using Lost Time Accident (LTA) metrics.           | <p>Records on Lost Time Accident (LTA) metrics at mill/estates had been verified. JKPP 8 been submitted to DOSH annually as follows:</p> <p>Diamond Jubilee POM: JKPP 8 Ref No. JKPP 8/52678/2019 submitted for year ending 2019 to DOSH on 21/1/2020.<br/>         Welch Estate: Occupational injuries summary recording via JKPP 8 form submission compliance was not evident. No evidence available on the completed JKPP 8 form for year ending 2019 has been submitted to DOSH. Thus, a Minor NC has been raised.</p> <p>Diamond Jubilee Estate: JKPP 8 submitted for year ending 2019 to DOSH on 15/1/2019<br/>         Bukit Asahan Estate: JKPP 8 submitted for year ending 2018 to DOSH on 15/1/2020.</p> | Non-compliance |
| <p><b>Principle 7:</b><br/>         Protect, conserve and enhance ecosystem and the environment.</p>   |  |  |                |
| <p><b>Criteria 7.1:</b><br/>         Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p> |  |  |                |
| 7.1.1  | <b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control. | <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.</p> <p>The estate has established IPM program. The plan was reviewed on annually basis. The IPM consists of Planting Beneficial Plant, Rat Baiting Applications and Barn Owl Census.</p>   | Complied       |

**RSPO P&C Public Summary Report  
Revision 10 (Mar 2020)**

|  |  |   |  |
|--|--|---|--|
|  |  | <p>The sampled estates has established IPM and reviewed on annually basis. The plan FY 2020 was focusing on planting beneficial plant, control Ganoderma disease, barn owl box and to control rat attack. The plan was monitored on monthly basis.</p> <p>Sighted the sampled implementation of the IPM plan as follows:</p> <p>Welch Estate</p> <ul style="list-style-type: none"> <li>i. Barn owl census was conducted 2 rounds per year. Ratio barn owl box in the estate was at 1:10 ha. Latest barn owl box census was conducted in February 2020. Occupancy rate recorded at average of at 82%.</li> <li>ii. Rat baiting was conducted 2 campaign per year. Latest Rat Baiting campaign was conducted on Jan – Feb 2020. The baiting rounds was at 2 – 3 rounds with acceptance level at 18%.</li> </ul> <p>Diamond Jubilee Estate</p> <ul style="list-style-type: none"> <li>i. Barn owl census was conducted 2 rounds per year. Ratio barn owl box in the estate was at 1:9 ha. Latest barn owl box census was conducted in February 2020. Occupancy rate recorded at average of at 41.18%.</li> <li>ii. Rat baiting was conducted 2 campaign per year. Latest Rat Baiting campaign was conducted on Jan – Feb 2020. The baiting rounds was at 3 – 4 rounds with acceptance level at 11%-20%.</li> </ul> <p>Bukit Asahan Estate</p> <ul style="list-style-type: none"> <li>i. Barn owl census was conducted 2 rounds per year. Ratio barn owl box in the estate was at 1:10 ha. Latest barn owl box census was conducted in March 2020. Occupancy rate recorded at average of at 77.48%.</li> </ul> |  |
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**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|  |  |   |          |
|--|--|---|----------|
| 7.1.2  | Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.     | <p>The estates has conducted assessment on list of species invasiveness used for biological control. No invasive species listed in the CABI.org introduced in the estate.</p> <p>Flora species were used for IPM such as Tunera subulata, Cassia cobanensis, Antigonan leptopus and Euphorbia heterophylla.</p> <p>Fauna species were used for IPM were Tyto alba.</p>  | Complied |
| 7.1.3  | There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.      | <p>No evidence and records of fire usage for pest control at all estate visited.</p> <p>Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest:</p> <p>"We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <p>ix. Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as protective firefighting measures in and around our operation."</p> | Complied |
| <p><b>Criteria 7.2:</b><br/> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p> |  |   |          |
| 7.2.1  | <b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. | <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> <p>i. General weeds : Glyphosate</p> <p>ii. Pennisetum polystachion : Metsulfuron Methyl</p>  | Complied |

|              |  | <p>iii. Stenochlaena palustris : Sodium chlorate<br/> Mature planting<br/> i. Grass weed and Asystasia : glyphosate &amp; 2,4-D amine<br/> The selection is also evaluated by the agronomist during his visit to the estate</p>  |              |              |                 |              |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |      |       |       |                 |
|--------------|--|--|--------------|--------------|-----------------|--------------|--------|-------|-------|-------|--------|-------|-------|-------|--------|-------|-------|-------|--------|-------|-------|-------|--------|-------|-------|-------|--------|-------|-------|-------|--------|-------|-------|-------|--------|-------|-------|-------|--------|------|-------|-------|-----------------|
| <p>7.2.2</p> | <p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</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.</p> <p>Sighted the sampled records of pesticides usage per ha at estate visited as follows:</p> <table border="1" data-bbox="958 694 1682 1378"> <thead> <tr> <th>Month</th> <th>Welch Estate</th> <th>Diamond Jubilee</th> <th>Bukit Asahan</th> </tr> </thead> <tbody> <tr> <td>Jan 19</td> <td>0.975</td> <td>0.173</td> <td>0.347</td> </tr> <tr> <td>Feb 19</td> <td>0.507</td> <td>0.445</td> <td>0.428</td> </tr> <tr> <td>Mar 19</td> <td>0.501</td> <td>0.923</td> <td>0.497</td> </tr> <tr> <td>Apr 19</td> <td>0.837</td> <td>0.375</td> <td>0.047</td> </tr> <tr> <td>May 19</td> <td>0.675</td> <td>0.265</td> <td>0.078</td> </tr> <tr> <td>Jun 19</td> <td>0.502</td> <td>0.366</td> <td>0.088</td> </tr> <tr> <td>Jul 19</td> <td>0.387</td> <td>0.296</td> <td>0.670</td> </tr> <tr> <td>Aug 19</td> <td>2.745</td> <td>0.238</td> <td>0.638</td> </tr> <tr> <td>Sep 19</td> <td>0.00</td> <td>0.461</td> <td>0.343</td> </tr> </tbody> </table> | Month        | Welch Estate | Diamond Jubilee | Bukit Asahan | Jan 19 | 0.975 | 0.173 | 0.347 | Feb 19 | 0.507 | 0.445 | 0.428 | Mar 19 | 0.501 | 0.923 | 0.497 | Apr 19 | 0.837 | 0.375 | 0.047 | May 19 | 0.675 | 0.265 | 0.078 | Jun 19 | 0.502 | 0.366 | 0.088 | Jul 19 | 0.387 | 0.296 | 0.670 | Aug 19 | 2.745 | 0.238 | 0.638 | Sep 19 | 0.00 | 0.461 | 0.343 | <p>Complied</p> |
| Month        | Welch Estate   | Diamond Jubilee  | Bukit Asahan |              |                 |              |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |      |       |       |                 |
| Jan 19       | 0.975  | 0.173  | 0.347        |              |                 |              |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |      |       |       |                 |
| Feb 19       | 0.507  | 0.445  | 0.428        |              |                 |              |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |      |       |       |                 |
| Mar 19       | 0.501  | 0.923  | 0.497        |              |                 |              |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |      |       |       |                 |
| Apr 19       | 0.837  | 0.375  | 0.047        |              |                 |              |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |      |       |       |                 |
| May 19       | 0.675  | 0.265  | 0.078        |              |                 |              |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |      |       |       |                 |
| Jun 19       | 0.502  | 0.366  | 0.088        |              |                 |              |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |      |       |       |                 |
| Jul 19       | 0.387  | 0.296  | 0.670        |              |                 |              |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |      |       |       |                 |
| Aug 19       | 2.745  | 0.238  | 0.638        |              |                 |              |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |      |       |       |                 |
| Sep 19       | 0.00   | 0.461  | 0.343        |              |                 |              |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |       |       |       |        |      |       |       |                 |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|        |   |   |          |      |       |       |        |       |       |       |        |      |       |       |  |
|--------|---|---|----------|------|-------|-------|--------|-------|-------|-------|--------|------|-------|-------|--|
|        |   | <table border="1"> <tr> <td>Oct 19</td> <td>0.00</td> <td>0.565</td> <td>0.071</td> </tr> <tr> <td>Nov 19</td> <td>1.013</td> <td>0.326</td> <td>0.181</td> </tr> <tr> <td>Dec 19</td> <td>0.00</td> <td>0.336</td> <td>0.224</td> </tr> </table>   | Oct 19   | 0.00 | 0.565 | 0.071 | Nov 19 | 1.013 | 0.326 | 0.181 | Dec 19 | 0.00 | 0.336 | 0.224 |  |
| Oct 19 | 0.00  | 0.565   | 0.071    |      |       |       |        |       |       |       |        |      |       |       |  |
| Nov 19 | 1.013   | 0.326   | 0.181    |      |       |       |        |       |       |       |        |      |       |       |  |
| Dec 19 | 0.00  | 0.336   | 0.224    |      |       |       |        |       |       |       |        |      |       |       |  |
| 7.2.3  | <b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.   | Action plan to reduce herbicide and pesticide usage were documented in Continual Improvement plan. The plan focusing on<br>i. Grass cut at the harvester path<br>ii. Land Cover Crop Establishment,<br>iii. Nephrolepis Establishment and<br>iv. Planting of beneficial plant to minimize bagworm and nettle caterpillar population<br>v. Increase no of Barn Owl Box   | Complied |      |       |       |        |       |       |       |        |      |       |       |  |
| 7.2.4  | There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.  | No evidence of prophylactic use of pesticides in the estates visited.   | Complied |      |       |       |        |       |       |       |        |      |       |       |  |
| 7.2.5  | 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, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.<br><br>The due diligence refers to: | Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.3: Protect and disclose environmental impacts and minimise resource use stated:<br><br>‘We aim to minimise our foot print and continuously reduce our use of resources through:<br><br>iv. Implementing integrated pest management programs, with no use of paraquat or chemicals classed as hazardous under the WHO 1A. We will phase out the WHO | Complied |      |       |       |        |       |       |       |        |      |       |       |  |

|              |  |  |                 |
|--------------|--|--|-----------------|
|              | <p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p> <p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> | <p>1B and those additional chemicals listed in the Stockholm or Rotterdam Conventions.”</p> <p>Sighted and verified at all estates visited, Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class III &amp; IV chemical used at visited estates.</p>   |                 |
| <p>7.2.6</p> | <p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p>           | <p>Pesticides operators for all estates visited has been provided with proper Personal Protective Equipment. Observed during site visit, the PPE provided to the operators such as google, half face respirator, nitrile hand glove, rubber boot and apron. Additionally, the operators has been given training regarding the usage safety and health issue and proper way for chemical application by the plantation executives, manager, and asst. manager and chemical supplier with knowledge on chemical handling and applications.</p> <p><u>Welch Estate:</u><br/>         Manuring Training dated 26/2/20<br/>         Inter Pump Training by Mycrop dated 21/01/20.</p> <p><u>Diamond Jubilee Estate:</u><br/>         Spraying Training dated 09/03/2020<br/>         Manuring Training dated 8/7/2020</p> <p><u>Bukit Asahan Estate:</u><br/>         Manuring and Spraying Training dated 8/8/2019</p> | <p>Complied</p> |



**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |  |   |          |
|-------|--|---|----------|
| 7.2.7 | <b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.                    | Pesticides were found stored in the mill and estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazad Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.   | Complied |
| 7.2.8 | All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes. | <p><u>Welch Estate:</u><br/> All chemical containers were reused as premix containers to transport diluted chemicals to the fields for application purpose. Otherwise the unused chemical containers are disposed to the licensed waste manager SS SETIA TEKNOLOGI ENTERPRISE. The last disposal was dated 24/10/19</p> <p><u>Diamond Jubilee Estate:</u><br/> All chemical containers were reused as premix containers to transport diluted chemicals to the fields for application purpose. Otherwise the unused chemical containers are disposed to the licensed waste manager SS SETIA TEKNOLOGI ENTERPRISE. The last disposal was dated 17/06/20.</p> <p><u>Bukit Asahan Estate:</u><br/> All chemical containers were reused as premix containers to transport diluted chemicals to the fields for application purpose. Otherwise the unused chemical containers are disposed to the licensed waste manager SS SETIA TEKNOLOGI ENTERPRISE. The last disposal was dated 9/07/20.</p> | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|        |  |  |          |
|--------|--|--|----------|
| 7.2.9  | <b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. | The Welch Estate, Diamond Jubilee Estate & Bukit Asahan Estate estates do not conduct aerial spraying.   | Complied |
| 7.2.10 | <b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.  | <p>Welch Estate</p> <p>Latest medical surveillance was conducted on on 23/5/2019. 17 workers were sent for surveillance and found fit to work as pesticides handlers. FY 2020 were schedule on 6 – 7 April as per letter to appointed clinic dated 13/3/2020 but postponed due to MCO and rescheduled to be conducted on 20 – 21/7/2020.</p> <p>Diamond Jubilee Estate</p> <p>i. Latest medical surveillance for chemical handlers was conducted on 22/6/2020 by certified OHS with reg. no. HQ/17/OHD/00/00094. 25 workers were sent for surveillance and all found fit to work as chemical handlers.</p> <p>Additionally, the Medical Asst. conducted medical screening for the chemical handlers. Sighted the medical screening records for the month of March, April, and May 2020.</p> <p>Bukit Asahan Estate</p> <p>- i. Latest medical surveillance for chemical handlers was conducted on 16 – 17/1/2020 and 12 - - 15/6/2020 by certified OHS with reg. no. HQ/17/OHD/00/00094. 21 workers were sent for surveillance and all found fit to work as chemical handlers.</p> | Complied |
| 7.2.11 | <b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.  | The estates visited prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as per internal memo signed by the estate manager. The memo has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the estate.   | Complied |

| Criteria 7.3:<br>Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner. |  |   |          |
|--|--|---|----------|
| 7.3.1  | A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. | <p>All waste and pollution are identified and documented in the Environmental Management Plan. Verified that the management plan includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented accordingly at mill and estates. Sampled details as below:</p> <p><u>Diamond Jubilee POM:</u></p> <p>a) Domestic waste (Workers Housing Complex, Office, Workshop, Store, Shop) – Domestic waste collection by tractor and dumped in trash bin before dispose by the contractor – Frequency is twice a week.</p> <p>b) Scheduled Waste – Used lubricant &amp; Hydraulic oil, Used Empty Chemical Container, Spent chemical from Lab, Contaminated Rags or other waste from maintenance activities – Ensure good working condition of SW store (locked, no chemical spill, signage) – Quarterly inspection.</p> <p>c) Industrial Waste – POME – Monitoring of POME BOD level at final discharge point – Frequency is monthly.</p> <p>d) GHG – Boiler operation - Installation of VORSEP to reduce dust particulate &amp; black smoke emission.</p> <p>At the Welch Estate, Diamond Jubilee Estate &amp; Bukit Asahan Estate the following types of waste has been identified accordingly:</p> <p>a) Scheduled waste – SW102, SW109, SW305, SW306, SW322, SW409, SW410, SW404. These schedule wastes were generated from workshop &amp; clinic activities including pesticide &amp; manuring activities.</p> <p>b) Domestic waste – rubbish &amp; sewage from line-site, office, workshop, store, shop.</p> <p>c) Recycle waste e.g. empty container</p> <p>d) Industrial waste – Scrap iron</p> | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |  |  |                |
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|       |  | Records on the usage and disposal were well recorded and documented.<br>Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained accordingly.   |                |
| 7.3.2 | Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. | <p><u>Diamond Jubilee POM:</u><br/>Waste Generated at mill includes SW 305 – Spent Lubricating Oil, SW 410 – Used Rags, SW 322 – Spent Hexane, SW322 Spent IPA, SW409 – Empty Chemical Containers.<br/>Sampled Consignment Note: 20200603122E7H5N dated 3/06/20 for SW 305 – Spent lubricating oil, Quantity disposed 0.2073 MT. Licensed Contractor Ranama Resources Sdn Bhd. Verified the waste inventory records were up to date.</p> <p>Disposal of waste material was not fully effective. The following lapses were identified:<br/>Diamond Jubilee POM: Empty grease drum and several empty oil paint containers were dumped together with the scrap metals at the Scarp Metal Yard.<br/>Bukit Asahan Estate:<br/>Refrigerator was dumped into the newly opened landfill pit besides the closed landfill pit dated 6/07/20.<br/>Empty Diesel Drum (3 drums) were found near the replanting field No. 2020B.<br/>Thus, a <b>Minor NC</b> has been raised for above issues.</p> <p><u>Welch Estate:</u><br/>Sampled Consignment Note: 2020061809Bt3OCJ dated 10/06/20 for SW 404 – Clinical Waste. Quantity disposed 0.2025 MT. Licensed Contractor Kualiti Alam Sdn Bhd. Verified the waste inventory records were up to date.</p> <p><u>Diamond Jubilee Estate:</u></p> | Non-compliance |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

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|   |   | <p>Sampled Consignment Note: 2020011716E5QRDA dated 20/01/20 for SW 410 – Used Oil Filter. Quantity disposed 0.20257 MT. Licensed Contractor Pentas Flora Sdn Bhd. Verified the waste inventory records were up to date.</p> <p><u>Bukit Asahan Estate:</u></p> <p>Sampled Consignment Note Manual Chit No M00802 dated 22/10/19 for SW 305 – Used Hydraulic Oil. Quantity disposed 0.5MT. Licensed Contractor Pentas Flora Sdn Bhd. Verified the waste inventory records were up to date. There was scheduled waste storage inventory which exceeded 180 days but the approval notification from the DOE officer was available for verification.</p> |          |
| 7.3.3   | The unit of certification does not use open fire for waste disposal.  | Visit to the mill and estate offices as well as housing area shown no open fire been use for waste disposal. Domestic wastes were disposed through municipal waste collector.   | Complied |
| <p><b>Criteria 7.4:</b><br/> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p> |   |   |          |
| 7.4.1   | Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. | <p>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 as per SOP belows</p> <p>The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents;</p> <p>a) EQMS chapter B8 - Leguminous Cover Crops<br/> b) EQMS chapter B14 – Manuring<br/> c) ARM Section 8 – Manuring</p>   | Complied |
| 7.4.2   | Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.                            | <p>Plant Nutrition and Protection Unit (PNU) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation.</p> <p>As per company SOP, the soil sampling analysis carried at 5 years interval.</p>  | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|       |   |   |          |
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|       |   | <p>The leaf analysis and soil analysis report was made available for review. Noted the analysis report for estate visited as follows:</p> <p>Welch Estate<br/>         Latest soil sampling analysis was carried out on 29/1/2019. Refer report no. S17/2019 dated 19/2/2019.<br/>         Latest leaf sampling analysis was carried out in Sept 2019. The report was stated in the 2020 Agronomic and Fertilizer Recommendations Report.</p> <p>Diamond Jubilee Estate<br/>         Latest soil sampling analysis was carried out on 11/6/2018. Refer report no. S42/2018 dated 12/7/2018.<br/>         Latest leaf sampling analysis was carried out in April 2019. The report was stated in the 2020 Agronomic and Fertilizer Recommendations Report dated 10/9/2019</p> <p>Bukit Asahan Estate<br/>         Latest soil sampling analysis was carried out on 6/4/2018. Refer report no. S26/2018 dated 26/4/2018.<br/>         Latest leaf sampling analysis was carried out in March 2019. The report was stated in the 2020 Agronomic and Fertilizer Recommendations Report dated 13/9/2019</p> |          |
| 7.4.3 | <p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> | <p>Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. The strategy as follows:</p> <ul style="list-style-type: none"> <li>i. EFB applied at selected fields at the estates.</li> <li>ii. Fibre and POM were use as compost material.</li> <li>iii. Palm residues after planting were left in the biomass row to decompose.</li> </ul>  | Complied |

|        |  | <p>Sighted the sampled records for EFB disposal as follows:</p> <table border="1" data-bbox="952 406 1736 790"> <thead> <tr> <th>Month</th> <th>Welch</th> <th>Diamond Jubilee</th> <th>Bukit Asahan</th> </tr> </thead> <tbody> <tr> <td>Jan 20</td> <td>0.00</td> <td>796.88</td> <td>0.00</td> </tr> <tr> <td>Feb 20</td> <td>0.00</td> <td>621.19</td> <td>0.00</td> </tr> <tr> <td>Mar 20</td> <td>0.00</td> <td>851.81</td> <td>0.00</td> </tr> <tr> <td>Apr 20</td> <td>0.00</td> <td>1500.69</td> <td>0.00</td> </tr> <tr> <td>May 20</td> <td>0.00</td> <td>1580.59</td> <td>0.00</td> </tr> <tr> <td>Jun 20</td> <td>0.00</td> <td>1605.41</td> <td>107.61</td> </tr> </tbody> </table> | Month        | Welch | Diamond Jubilee | Bukit Asahan | Jan 20 | 0.00 | 796.88 | 0.00 | Feb 20 | 0.00 | 621.19 | 0.00 | Mar 20 | 0.00 | 851.81 | 0.00 | Apr 20 | 0.00 | 1500.69 | 0.00 | May 20 | 0.00 | 1580.59 | 0.00 | Jun 20 | 0.00 | 1605.41 | 107.61 |  |
|--------|--|---|--------------|-------|-----------------|--------------|--------|------|--------|------|--------|------|--------|------|--------|------|--------|------|--------|------|---------|------|--------|------|---------|------|--------|------|---------|--------|--|
| Month  | Welch  | Diamond Jubilee   | Bukit Asahan |       |                 |              |        |      |        |      |        |      |        |      |        |      |        |      |        |      |         |      |        |      |         |      |        |      |         |        |  |
| Jan 20 | 0.00   | 796.88  | 0.00         |       |                 |              |        |      |        |      |        |      |        |      |        |      |        |      |        |      |         |      |        |      |         |      |        |      |         |        |  |
| Feb 20 | 0.00   | 621.19  | 0.00         |       |                 |              |        |      |        |      |        |      |        |      |        |      |        |      |        |      |         |      |        |      |         |      |        |      |         |        |  |
| Mar 20 | 0.00   | 851.81  | 0.00         |       |                 |              |        |      |        |      |        |      |        |      |        |      |        |      |        |      |         |      |        |      |         |      |        |      |         |        |  |
| Apr 20 | 0.00   | 1500.69   | 0.00         |       |                 |              |        |      |        |      |        |      |        |      |        |      |        |      |        |      |         |      |        |      |         |      |        |      |         |        |  |
| May 20 | 0.00   | 1580.59   | 0.00         |       |                 |              |        |      |        |      |        |      |        |      |        |      |        |      |        |      |         |      |        |      |         |      |        |      |         |        |  |
| Jun 20 | 0.00   | 1605.41   | 107.61       |       |                 |              |        |      |        |      |        |      |        |      |        |      |        |      |        |      |         |      |        |      |         |      |        |      |         |        |  |
| 7.4.4  | Records of fertiliser inputs are maintained. | <p>The estate maintain the records of manuring application as per recommendation by the agronomist.</p> <p>Observed application records as per agronomist recommendation:</p> <p>Welch Estate</p> <p>i. Month program: Jan 2020<br/> Field: 2005<br/> Ha program: 94.45 ha<br/> Type: Rock AS<br/> Rate/palm: 1.75<br/> Month completed: Jan 2020</p> <p>ii. Month program: Jan 2020</p>  | Complied     |       |                 |              |        |      |        |      |        |      |        |      |        |      |        |      |        |      |         |      |        |      |         |      |        |      |         |        |  |

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|  |  | <p>Field: 1999<br/>Ha program: 33.04 ha<br/>Type: AS<br/>Rate/palm: 1.75<br/>Month completed: Feb 2020</p> <p>Diamond Jubilee Estate<br/>i. Month program: Apr 2020<br/>Field: 2005H<br/>Ha program: 53.90 ha<br/>Type: Kieserite<br/>Rate/palm: 1.50<br/>Month completed: July 2020</p> <p>ii. Month program: Feb - Mar 2020<br/>Field: 2000H<br/>Ha program: 74.93 ha<br/>Type: Kieserite<br/>Rate/palm: 2.00<br/>Month completed: Mar 2020</p> <p>Bukit Asahan Estate<br/>i. Month program: Apr 2020<br/>Field: 2001J<br/>Ha program: 26.11 ha</p> |  |
|--|--|---|--|



|  |  | <p>Type: Borate<br/>Rate/palm: 0.10<br/>Month completed: Jun 2020</p> <p>ii. Month program: Jan - Mar 2020<br/>Field: 2002D<br/>Ha program: 39.61 ha<br/>Type: MOP<br/>Rate/palm: 1.5<br/>Month completed: Mar 2020</p>  |        |             |       |   |                 |   |             |   |          |
|--|--|--|--------|-------------|-------|---|-----------------|---|-------------|---|----------|
| <p><b>Criteria 7.5:</b><br/>Practices minimise and control erosion and degradation of soils.</p> |  |  |        |             |       |   |                 |   |             |   |          |
| 7.5.1  | <p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> | <p>Soil series map were available for all estates visited prepared by the AAT-Precision Agriculture Unit. No fragile soils identified in all estates in SOU 18. Soil Identified as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Soil Series</th> </tr> </thead> <tbody> <tr> <td>Welch</td> <td>Local alluvium, Serdang/Bungor, Munchong, Prang, Malacca/Bungor</td> </tr> <tr> <td>Diamond Jubilee</td> <td>Rengam, Malacca, Jerangau, Unclassified</td> </tr> <tr> <td>Bkt. Asahan</td> <td>Bungor, Durian, Holyrood, Kulai, Munchong, Local alluvium, Malacca, Prang, Tavy, unclassified</td> </tr> </tbody> </table> | Estate | Soil Series | Welch | Local alluvium, Serdang/Bungor, Munchong, Prang, Malacca/Bungor | Diamond Jubilee | Rengam, Malacca, Jerangau, Unclassified | Bkt. Asahan | Bungor, Durian, Holyrood, Kulai, Munchong, Local alluvium, Malacca, Prang, Tavy, unclassified | Complied |
| Estate   | Soil Series  |  |        |             |       |   |                 |   |             |   |          |
| Welch  | Local alluvium, Serdang/Bungor, Munchong, Prang, Malacca/Bungor  |  |        |             |       |   |                 |   |             |   |          |
| Diamond Jubilee  | Rengam, Malacca, Jerangau, Unclassified  |  |        |             |       |   |                 |   |             |   |          |
| Bkt. Asahan  | Bungor, Durian, Holyrood, Kulai, Munchong, Local alluvium, Malacca, Prang, Tavy, unclassified          |  |        |             |       |   |                 |   |             |   |          |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

| 7.5.2   | No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. | <p>Stated in Reclassification of Conservation Set Aside (CSA) for Upstream Operation ver.2 dated 31/5/2019, ref. no. GSQM/PLS/CSA-GD01 under section 4.0 Conversion of crops/areas in Table A item as follows:</p> <table border="1" data-bbox="958 475 1718 703"> <thead> <tr> <th>No</th> <th>Category</th> <th>Conversion to oil palm/other Agricultural Crops</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>CSA</td> <td>Non-convertible for undeveloped peatland, slopes &gt; 25 degree (more than 25 ha), buffer of non-gazette rivers/streams and forest boundary reserve</td> </tr> </tbody> </table> <p>Sighted at Diamond Jubilee Estate and Bukit Asahan Estate, no replanting was conducted on steep slopes more than 25 degree.</p> | No       | Category | Conversion to oil palm/other Agricultural Crops | 4 | CSA | Non-convertible for undeveloped peatland, slopes > 25 degree (more than 25 ha), buffer of non-gazette rivers/streams and forest boundary reserve | Complied |
|---|--|--|----------|----------|---|---|-----|--|----------|
| No  | Category   | Conversion to oil palm/other Agricultural Crops  |          |          |   |   |     |  |          |
| 4   | CSA  | Non-convertible for undeveloped peatland, slopes > 25 degree (more than 25 ha), buffer of non-gazette rivers/streams and forest boundary reserve   |          |          |   |   |     |  |          |
| 7.5.3   | There is no new planting of oil palm on steep terrain.   | No new planting conducted at all estates visited.  | Complied |          |   |   |     |  |          |
| <p><b>Criteria 7.6:</b><br/> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p> |  |  |          |          |   |   |     |  |          |
| 7.6.1   | <b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.                           | <p>Soil series map were available for all estates visited prepared by the AAT-Precision Agriculture Unit. No fragile soils identified in all estates in SOU 18.</p> <p>As sighted in estates visited, the estates have taken into account the land terrain, drainage and road systems in planning the 2020 replanting.</p>   | Complied |          |   |   |     |  |          |
| 7.6.2   | Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.   | Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest:  | Complied |          |   |   |     |  |          |

|  |   | <p>"We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <p>vii. No new development of peat areas, regardless of depth or location. We will seek to rehabilitate existing plantings on peats where possible.</p>  |              |       |                 |              |         |       |        |        |         |       |        |        |          |        |       |        |           |        |       |       |           |        |       |       |       |       |       |       |          |
|--|---|--|--------------|-------|-----------------|--------------|---------|-------|--------|--------|---------|-------|--------|--------|----------|--------|-------|--------|-----------|--------|-------|-------|-----------|--------|-------|-------|-------|-------|-------|-------|----------|
| 7.6.3  | Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. | <p>The AAT - Precision Agriculture Unit conducted assessment and provided the estates with topography maps. Sampled topography information at estates visited as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Welch</th> <th>Diamond Jubilee</th> <th>Bukit Asahan</th> </tr> </thead> <tbody> <tr> <td>0° - 2°</td> <td>0.19%</td> <td>33.44%</td> <td>20.17%</td> </tr> <tr> <td>2° - 6°</td> <td>9.34%</td> <td>60.65%</td> <td>43.53%</td> </tr> <tr> <td>6° - 12°</td> <td>35.69%</td> <td>5.75%</td> <td>32.20%</td> </tr> <tr> <td>12° - 20°</td> <td>37.58%</td> <td>0.15%</td> <td>4.01%</td> </tr> <tr> <td>20° - 25°</td> <td>15.60%</td> <td>0.01%</td> <td>0.09%</td> </tr> <tr> <td>&gt; 25°</td> <td>1.59%</td> <td>0.00%</td> <td>0.00%</td> </tr> </tbody> </table> |              | Welch | Diamond Jubilee | Bukit Asahan | 0° - 2° | 0.19% | 33.44% | 20.17% | 2° - 6° | 9.34% | 60.65% | 43.53% | 6° - 12° | 35.69% | 5.75% | 32.20% | 12° - 20° | 37.58% | 0.15% | 4.01% | 20° - 25° | 15.60% | 0.01% | 0.09% | > 25° | 1.59% | 0.00% | 0.00% | Complied |
|  | Welch   | Diamond Jubilee  | Bukit Asahan |       |                 |              |         |       |        |        |         |       |        |        |          |        |       |        |           |        |       |       |           |        |       |       |       |       |       |       |          |
| 0° - 2°  | 0.19%   | 33.44%   | 20.17%       |       |                 |              |         |       |        |        |         |       |        |        |          |        |       |        |           |        |       |       |           |        |       |       |       |       |       |       |          |
| 2° - 6°  | 9.34%   | 60.65%   | 43.53%       |       |                 |              |         |       |        |        |         |       |        |        |          |        |       |        |           |        |       |       |           |        |       |       |       |       |       |       |          |
| 6° - 12°   | 35.69%  | 5.75%  | 32.20%       |       |                 |              |         |       |        |        |         |       |        |        |          |        |       |        |           |        |       |       |           |        |       |       |       |       |       |       |          |
| 12° - 20°  | 37.58%  | 0.15%  | 4.01%        |       |                 |              |         |       |        |        |         |       |        |        |          |        |       |        |           |        |       |       |           |        |       |       |       |       |       |       |          |
| 20° - 25°  | 15.60%  | 0.01%  | 0.09%        |       |                 |              |         |       |        |        |         |       |        |        |          |        |       |        |           |        |       |       |           |        |       |       |       |       |       |       |          |
| > 25°  | 1.59%   | 0.00%  | 0.00%        |       |                 |              |         |       |        |        |         |       |        |        |          |        |       |        |           |        |       |       |           |        |       |       |       |       |       |       |          |
| <p><b>Criteria 7.7</b><br/>           No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p> |   |  |              |       |                 |              |         |       |        |        |         |       |        |        |          |        |       |        |           |        |       |       |           |        |       |       |       |       |       |       |          |
| 7.7.1  | <b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.   | <p>No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT – Precision Agricultural Unit.</p> <p>Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.</p>  | Complied     |       |                 |              |         |       |        |        |         |       |        |        |          |        |       |        |           |        |       |       |           |        |       |       |       |       |       |       |          |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|  |  |  |          |
|--|--|--|----------|
| 7.7.2  | Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.   | No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT – Precision Agricultural Unit.<br>Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable. | Complied |
| <b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance. |  |  |          |
| 7.7.3  | <b>(C)</b> Subsidence of peat is monitored, documented and minimised.  | No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT – Precision Agricultural Unit.<br>Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable. | Complied |
| 7.7.4  | <b>(C)</b> A documented water and ground cover management programme is in place.   | No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT – Precision Agricultural Unit.<br>Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable. | Complied |
| 7.7.5  | <b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. | No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT – Precision Agricultural Unit.<br>Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable. | Complied |

|       | This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.  |   |          |          |   |   |     |  |          |
|-------|--|---|----------|----------|---|---|-----|--|----------|
| 7.7.6 | <b>(C)</b> All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.   | No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT – Precision Agricultural Unit.<br>Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.  | Complied |          |   |   |     |  |          |
| 7.7.7 | <b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance. | <p>Stated in Reclassification of Conservation Set Aside (CSA) for Upstream Operation ver.2 dated 31/5/2019, ref. no. GSQM/PLS/CSA-GD01 under section 4.0 Conversion of crops/areas in Table A item as follows:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Category</th> <th>Conversion to oil palm/other Agricultural Crops</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>CSA</td> <td>Non-convertible for undeveloped peatland, slopes &gt; 25 degree (more than 25 ha), buffer of non-gazette rivers/streams and forest boundary reserve</td> </tr> </tbody> </table> <p>No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT – Precision Agricultural Unit.<br/>Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.</p> | No       | Category | Conversion to oil palm/other Agricultural Crops | 4 | CSA | Non-convertible for undeveloped peatland, slopes > 25 degree (more than 25 ha), buffer of non-gazette rivers/streams and forest boundary reserve | Complied |
| No    | Category   | Conversion to oil palm/other Agricultural Crops   |          |          |   |   |     |  |          |
| 4     | CSA  | Non-convertible for undeveloped peatland, slopes > 25 degree (more than 25 ha), buffer of non-gazette rivers/streams and forest boundary reserve  |          |          |   |   |     |  |          |

**Criteria 7.8**

Practices maintain the quality and availability of surface and groundwater.

|              |  |   |                       |
|--------------|--|---|-----------------------|
| <p>7.8.1</p> | <p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <ul style="list-style-type: none"> <li>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</li> <li>b) Workers have adequate access to clean water.</li> </ul> | <p><u>Diamond Jubilee POM:</u><br/>Water management plan is in place and implemented as per detailed in the Environmental Management Plan last updated 5/7/2020. The plan addresses adequately on the 1) unit of certification does not restrict access to clean water or contribute to pollution of water used by communities 2) Workers have adequate access to clean water. Sampled water management plan at mill &amp; estates as follows:</p> <ul style="list-style-type: none"> <li>a) To monitor the usage of treated water in monthly basis.</li> <li>b) Protection of watercourse and wetland</li> <li>c) To reuse/recycle wastewater</li> </ul> <p><u>Welch Estate:</u><br/>Water Management Plan is in place and implemented as per detailed in the Environmental Management Plan last updated 11/5/2020. The objectives include on Protection of watercourse and wetland, water consumption &amp; contingency plan during water shortage, dry spell or severe water pollution and recycling water from pre-mix area.</p> <p><u>Diamond Jubilee Estate:</u><br/>Water Management Plan is in place and implemented as per detailed in the Environmental Management Plan last reviewed on 17/06/2020. The objectives include on Protection of watercourse and wetland, water consumption &amp; contingency plan during water shortage, dry spell or severe water pollution and recycling water from pre-mix area.</p> <p><u>Bukit Asahan Estate:</u><br/>Water Management Plan was incorporated in the Environmental Management Plan last reviewed on 3/01/20. The objectives include on Protection of watercourse and</p> | <p>Non-compliance</p> |
|--------------|--|---|-----------------------|

|       |   | <p>wetland, water consumption &amp; contingency plan during water shortage, dry spell or severe water pollution and recycling water from pre-mix area. The Water Management Plan was not effectively implemented. Lapses identified as follows:<br/>Bukit Asahan Estate: "Sungai Asahan" riverbank was not adequately maintained as per the water management plan. The following lapses were identified:<br/>a) Soil erosion was noticed near the river bank Field No. 2019A<br/>b) Debris from loose fruit siever was dumped near the river bank. Thus, a Minor NC has been raised.</p>  |  |                      |                      |   |     |    |          |
|-------|---|---|--|----------------------|----------------------|---|-----|----|----------|
| 7.8.2 | <p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> | <p>The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table border="1" data-bbox="958 1238 1742 1375"> <thead> <tr> <th></th> <th>River width (Meters)</th> <th>Buffer Zone (Meters)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>&gt;40</td> <td>50</td> </tr> </tbody> </table> |  | River width (Meters) | Buffer Zone (Meters) | 1 | >40 | 50 | Complied |
|       | River width (Meters)  | Buffer Zone (Meters)  |  |                      |                      |   |     |    |          |
| 1     | >40   | 50  |  |                      |                      |   |     |    |          |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|               |   | <table border="1"> <tr> <td>2</td> <td>20-40</td> <td>40</td> </tr> <tr> <td>3</td> <td>10-20</td> <td>20</td> </tr> <tr> <td>4</td> <td>5-10</td> <td>10</td> </tr> <tr> <td>5</td> <td>&lt;5</td> <td>5</td> </tr> </table>   | 2     | 20-40             | 40           | 3    | 10-20         | 20   | 4          | 5-10 | 10         | 5    | <5 | 5        |  |  |
|---------------|---|---|-------|-------------------|--------------|------|---------------|------|------------|------|------------|------|----|----------|--|--|
| 2             | 20-40   | 40  |       |                   |              |      |               |      |            |      |            |      |    |          |  |  |
| 3             | 10-20   | 20  |       |                   |              |      |               |      |            |      |            |      |    |          |  |  |
| 4             | 5-10  | 10  |       |                   |              |      |               |      |            |      |            |      |    |          |  |  |
| 5             | <5  | 5   |       |                   |              |      |               |      |            |      |            |      |    |          |  |  |
| 7.8.3         | Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. | <p>Mill effluent analysis were done on monthly basis by R&amp;D Centre – Carey Island. Sampled the following Effluent Analysis Test Reports:</p> <p>a) Effluent Test Report No. EP177/2020, Date Tested 18/06/2020, BOD (mg/L) = 4590.</p> <p>b) Effluent Test Report No. EP147/2020, Date Tested 14/05/2020, BOD (mg/L) = 1070.</p> <p>c) Effluent Test Report No. EP136/2020, Date Tested 05/05/2020, BOD (mg/L) = 1545.</p> <p>Verified that the above sampled results of final discharge BOD complied with BOD (mg/L) Standard Quality limit of below 5000.</p> <p>Land Application has been practised.</p> |       | Complied          |              |      |               |      |            |      |            |      |    |          |  |  |
| 7.8.4         | Mill water use per tonne of FFB is monitored and recorded.  | <p>Summary of Mill water use per tonne of FFB been identified as per in Water Consumption FY 2020. Data been monitored on monthly basis as per below:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Total Process/FFB</th> </tr> </thead> <tbody> <tr> <td>January 2020</td> <td>1.58</td> </tr> <tr> <td>February 2020</td> <td>1.56</td> </tr> <tr> <td>March 2020</td> <td>1.68</td> </tr> <tr> <td>April 2020</td> <td>1.38</td> </tr> </tbody> </table>   | Month | Total Process/FFB | January 2020 | 1.58 | February 2020 | 1.56 | March 2020 | 1.68 | April 2020 | 1.38 |    | Complied |  |  |
| Month         | Total Process/FFB   |   |       |                   |              |      |               |      |            |      |            |      |    |          |  |  |
| January 2020  | 1.58  |   |       |                   |              |      |               |      |            |      |            |      |    |          |  |  |
| February 2020 | 1.56  |   |       |                   |              |      |               |      |            |      |            |      |    |          |  |  |
| March 2020    | 1.68  |   |       |                   |              |      |               |      |            |      |            |      |    |          |  |  |
| April 2020    | 1.38  |   |       |                   |              |      |               |      |            |      |            |      |    |          |  |  |



**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |  |  |      |  |          |
|---|--|--|------|--|----------|
|   |  | May 2020   | 1.59 |  |          |
|   |  | June 2020  | 1.66 |  |          |
| <b>Criteria 7.9:</b><br>Efficiency of fossil fuel use and the use of renewable energy is optimised.   |  |  |      |  |          |
| 7.9.1   | A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is implemented, monitored and documented.  | <u>Welch Estate:</u><br>Monitoring Diesel Use per Ton of FFB available and monitored on monthly basis. Seen Diesel Use Per Ton of FFB as follows: Jan-20: 4.63, Feb-20: 3.56, Mar-20: 3.34, Apr-20: 1.72, May-20: 1.59<br><br><u>Diamond Jubilee Estate:</u><br>Monitoring Diesel Use per Ton of FFB available and monitored on monthly basis. Seen Diesel Use Per Ton of FFB as follows: Jan-20: 1.63, Feb-20:1.16, Mar-20: 1.01, Apr-20: 0.75, May-20: 0.75<br><br><u>Bukit Asahan Estate:</u><br>Monitoring Diesel Use per Ton of FFB available and monitored on monthly basis. Detail of Diesel Use Per Ton of FFB has been verified accordingly from January-20 until May-20. |      |  | Complied |
| <b>Criteria 7.10:</b><br>Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions. |  |  |      |  |          |
| 7.10.1  | <b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported. | GHG emissions are identified and assessed as per Environmental Management Plan. GHG details listed as per in Environmental Management Plan for Air Emission Pollution -Boiler Operation – Installation of VORSEP to reduce dust particulate & black smoke emission.  |      |  | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|        |  |  |          |
|--------|--|--|----------|
|        |  | <p>Seen the Stack Emission Monitoring for Boiler No.1, Ref#ETD/KKSD/SE/2019/08/19656, Date monitored: 29/08/19. Results of Total Particulate Matter mg/m<sup>3</sup>@12%CO<sub>2</sub> is 52.08 within the allowable limit of 150 as per Malaysian Clean Air Regulation 2014.</p> <ul style="list-style-type: none"> <li>- Environmental Air Monitoring Report Ref#ETD/A/KSDJ/2019-09/19679, Date Monitored: 3&amp;4 September 2019. The TSP, SO<sub>2</sub> and NO<sub>2</sub> monitoring results at Points A1 and A2 were within the Malaysian Ambient Air Quality Standard 2013 of 260 ug/m<sup>3</sup>, 90ug/m<sup>3</sup> and 300 ug/m<sup>3</sup> respectively.</li> </ul>   |          |
| 7.10.2 | <b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). | Not applicable as there has been no new planting at the Welch Estate, Diamond Jubilee Estate and Bukit Asahan Estate.  | N/A      |
| 7.10.3 | <b>(C)</b> Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.   | <p>Assessment of all polluting activities was conducted under Environmental Aspect Impact for identifying activities that contributes significant impact to environment. Amongst all, wastewater identified other than effluent were sourced from:</p> <ul style="list-style-type: none"> <li>- Chemical mixing area</li> <li>- Sprayer PPE washing area</li> <li>- Workshop</li> <li>- Line site &amp; office</li> <li>- Washrooms</li> </ul> <p>Boiler smoke emission identified as pollutants was monitored using online system (CEMS-DIS) to DOE based on the transmitted data from boiler smoke density indicator and recorder. The emissions of all parameters tested were complied with their respective limits as stipulated in the EQ (Clean Air) Regulations 2014.</p> | Complied |

**Criteria 7.11:**

Fire is not used for preparing land and is prevented in the managed area.

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|  |   |   |          |
|--|---|---|----------|
| 7.11.1   | <b>(C)</b> Land for new planting or replanting is not prepared by burning.  | There was no land prepared by burning at Diamond Jubilee CU. All estates had continued to adhere to the policy as per the Agricultural Manual and SOP on (Zero Burning) which advocates zero burning for land preparation and as per their Environmental Policy.  | Complied |
| 7.11.2   | The unit of certification establishes fire prevention and control measures for the areas under its direct management.   | There was no land prepared by burning at Diamond Jubilee CU. All estates had continued to adhere to the policy as per the Agricultural Manual and SOP on (Zero Burning) which advocates zero burning for land preparation and as per their Environmental Policy.  | Complied |
| 7.11.3   | The unit of certification engages with adjacent stakeholders on fire prevention and control measures.   | The management already approach the stakeholder during stakeholder consultation meeting regarding to fire prevention and control measure.   | Complied |
| <b>Criteria 7.12:</b>  |   |   |          |
| Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced. |   |   |          |
| 7.12.1   | <b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protector enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests<br><br>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. | <u>Welch Estate, Diamond Jubilee Estate &amp; Bukit Asahan Estate:</u><br>There was no land clearing made since November 2005 or Land clearing since 15 November 2018.  | Complied |
| 7.12.2   | <b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:<br>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new  | <u>Welch Estate:</u><br>HCV Assessment Report available covering Welch Estate under assessment covering SOU 19 Pagoh & SOU 20 Chaah. Final Report (Version 2.0) dated August 2016 available for verification. The HCV Assessment was conducted by the trained & experienced PSQM Department of Sime Darby Plantation. | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|                        | <p>land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> | <table border="1" data-bbox="958 403 1742 534"> <thead> <tr> <th>Estate</th> <th>Assessment</th> <th>Ha</th> <th>Present HCV</th> </tr> </thead> <tbody> <tr> <td>Welch Estate</td> <td>Water catchment (water body 6)</td> <td>0.95</td> <td>HCV 4</td> </tr> </tbody> </table> <p>The above water catchment area is used for rubber operation. The catchment area is well fenced.</p> <p><u>Diamond Jubilee Estate &amp; Bukit Asahan Estate:</u><br/> HCV Assessment Report available covering under assessment covering SOU 18 Diamond Jubilee. Final Report (Version 2.0) dated August 2017 available for verification. The HCV Assessment was conducted by the trained &amp; experienced PSQM Department of Sime Darby Plantation.</p> <table border="1" data-bbox="958 834 1742 1161"> <thead> <tr> <th>Estate</th> <th>Assessment</th> <th>Ha</th> <th>Present HCV</th> </tr> </thead> <tbody> <tr> <td>Diamond Jubilee Estate</td> <td>Water catchment</td> <td>5.58</td> <td>HCV 4</td> </tr> <tr> <td rowspan="2">Bukit Asahan Estate</td> <td>Water catchment (Ayer Tekah Division)</td> <td>0.69</td> <td>HCV 4</td> </tr> <tr> <td>Water catchment (Main Division)</td> <td>5.58</td> <td>HCV 4</td> </tr> </tbody> </table> <p>Verified for above HCV 4 identified, The HCV management plan has been established accordingly in the Environmental Management Plan. Control measures include to erect signage such as No hunting, No fishing, No cutting of protected flora.</p> | Estate      | Assessment | Ha | Present HCV | Welch Estate | Water catchment (water body 6) | 0.95 | HCV 4 | Estate | Assessment | Ha | Present HCV | Diamond Jubilee Estate | Water catchment | 5.58 | HCV 4 | Bukit Asahan Estate | Water catchment (Ayer Tekah Division) | 0.69 | HCV 4 | Water catchment (Main Division) | 5.58 | HCV 4 |  |
|------------------------|---|--|-------------|------------|----|-------------|--------------|--------------------------------|------|-------|--------|------------|----|-------------|------------------------|-----------------|------|-------|---------------------|---------------------------------------|------|-------|---------------------------------|------|-------|--|
| Estate                 | Assessment  | Ha   | Present HCV |            |    |             |              |                                |      |       |        |            |    |             |                        |                 |      |       |                     |                                       |      |       |                                 |      |       |  |
| Welch Estate           | Water catchment (water body 6)  | 0.95   | HCV 4       |            |    |             |              |                                |      |       |        |            |    |             |                        |                 |      |       |                     |                                       |      |       |                                 |      |       |  |
| Estate                 | Assessment  | Ha   | Present HCV |            |    |             |              |                                |      |       |        |            |    |             |                        |                 |      |       |                     |                                       |      |       |                                 |      |       |  |
| Diamond Jubilee Estate | Water catchment   | 5.58   | HCV 4       |            |    |             |              |                                |      |       |        |            |    |             |                        |                 |      |       |                     |                                       |      |       |                                 |      |       |  |
| Bukit Asahan Estate    | Water catchment (Ayer Tekah Division)   | 0.69   | HCV 4       |            |    |             |              |                                |      |       |        |            |    |             |                        |                 |      |       |                     |                                       |      |       |                                 |      |       |  |
|                        | Water catchment (Main Division)   | 5.58   | HCV 4       |            |    |             |              |                                |      |       |        |            |    |             |                        |                 |      |       |                     |                                       |      |       |                                 |      |       |  |

**PROCEDURAL NOTE** for 7.12.2:

Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).

|        |   |  |          |
|--------|---|--|----------|
| 7.12.3 | <i>Indicator is not applicable in Malaysia context.</i>   | Not applicable   | N/A      |
| 7.12.4 | <b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). | There was an appropriate consultation process for identification, management and monitoring of HCVs. Conservation area is maintained at the water catchment area. At Welch Estate, 0.95 Ha of pond was classified as HCV4.<br><br>At Diamond Jubilee Estate, 5.58 ha of pond was classified as HCV 4. The pond serves as conservation values of provision of water.<br><br>Whereas at Bukit Asahan Estate, 0.69Ha water catchment at Ayer Tekah Division and 5.58 Ha of Water catchment (Main Division) were been classified as HCV 4. | Complied |
| 7.12.5 | Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.  | No HCV set asides with existing rights of local communities have been identified.  | N/A      |
| 7.12.6 | All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company   | Wildlife found in plantation identified in the section 2.2.2 of HCV Assessment Report covering (1) - Welch Estate under assessment covering SOU 19 Pagoh & SOU 20 Chaah. Final Report (Version 2.0) dated August 2016, and (2) - Diamond Jubilee Estate & Bukit Asahan Estate under assessment covering SOU 18 Final Report (Version 2.0) April 2017.<br><br>Common wildlife which classified under IUCN conservation status and WCA 2010 (Act 716) was identified, i.e. for birds (white-throated kingfisher – least concern          | Complied |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|        |   |  |          |
|--------|---|--|----------|
|        | is found to capture, harm, collect, trade, possess or kill these species.   | (IUCN)/totally protected wildlife), mammals (wild boar – least concern(IUCN)/protected wildlife), reptiles (king cobra – vulnerable (IUCN)/protected wildlife).<br>Regular patrols within the operating unit estates were carried out and findings recorded by the respective Estate executives to monitor the Conservation / buffer zone areas. Records of patrolling and animal sighting were maintained and updated.<br>Mechanism for reporting the sightings of various types of wildlife was implemented accordingly. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Signage that prohibit hunting, fishing and water polluting activities were verified on-site and found to have been well maintained. |          |
| 7.12.7 | The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.          | There were no peatland conservation areas, RTE species discovered in the CU, Sime Darby Plantation Bhd still established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species.<br>If found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the Wildlife Department immediately.<br>The training for HCV also has been organised at all the estates.<br>Sampled details as follows;<br>Welch Estate: HCV Briefing to Sprayers/Manuring Workers dated 13/11/19.<br>Diamond Jubilee Estate: HCV Briefing to Sprayers dated 7/02/20.   | Complied |
| 7.12.8 | <b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. | <u>Welch Estate, Diamond Jubilee Estate &amp; Bukit Asahan Estate:</u><br>Not Applicable as there has been HCV assessment been conducted and there was no new land clearing made.  | Complied |

**Appendix B: Approved Time Bound Plan**

Details of Time Bound Plan as submitted by Sime Darby Plantation Berhad (30th June 2019)

**Table 1: Initial Timebound Plan and Summary of RSPO Certification Status**

| Financial year (July – June) | Targeted                                 | Achieved/Status   | Attachments   |
|------------------------------|--|---|---|
| Jun-08                       | 5 SOUs                                   | <p><b>Achievement of Timebound Plan</b><br/>Sime Darby Plantation has had all its SOUs (Malaysian &amp; 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).</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. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. A new mill in Liberia is planned to be commissioned.</p> <p>Note: Time-bound plan to achieve 100% RSPO certification has shifted to 2015</p> | <p>For details please refer to Attachments:</p> <p>i) SDP - RSPO Certification Status for Malaysia Operations</p> <p>ii) SDP- RSPO Certification Status for Indonesia Operations</p> <p>iii) Updates on PT MAS</p> <p>iii) RSPO SCCS status for Sime Darby Plantation (Downstream Operations)</p> |
| 2008/2009                    | 20 SOUs<br>(from Malaysia and Indonesia) |   |   |
| 2009/2010                    | 20 SOUs<br>(from Malaysia and Indonesia) |   |   |
| 2010/2011<br>(End Dec 2011)  | 17 SOUs<br>(from Malaysia and Indonesia) |   |   |

Note: SOU - Strategic Operating Units (consisting of one oil mill and supplying estates)

**Table 2: Details of RSPO Certification Status as at June 2019**

| Status   | Malaysia | Indonesia | Liberia | Total | Remarks   |
|--|----------|-----------|---------|-------|---|
| RSPO Certified   | 33       | 23        | 0       | 56    | <p>Malaysia<br/>* Effectively 33 Mills (Excluding Bintang Oil Mill)<br/>- Note: Sg Samak and Jelela Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down, and Pekaka POM is being mothballed.</p> <p>*SDP acquired Bintang Palm Oil Mill, Talisman Estate, and Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, while Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut. Lian Seng will be incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018, whilst Talisman Estate has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2017. For Bintang Oil Mill, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold as at Dec 2017.</p> <p>Indonesia<br/>*Effectively 23 Mills<br/>*Note: <i>Angsana Mini POM closed down in 2016. Selabak POM is being mothballed.</i></p> |
| Planned for Certification / Undergoing Stage 1 or Stage 2 Assessment/ RSPO EB Review | 0        | 1         | 1       | 2     | <p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p>Indonesia<br/>PT MAS has undergone RSPO Main assessment and is delayed due to some social disputes. The new target date for certification is by 2020 subject to the progress of the matter being resolved.</p>   |

|                   |    |    |   |   |   |
|-------------------|----|----|---|---|---|
|                   |    |    |   | <p>However, the property was disposed on 25 June 2019 and a official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019. Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.</p> <p>Smallholders</p> <p>As at Dec 2017, a total of 28,712 Ha of smallholders have been certified. The entire KKPA (1-5) in Sebamban, KKPA Sg. Cengal, and Plasma TGK and SIA (East and West Plasma) are now RSPO certified with a production capacity of 465,602 mt of FFB. Total scheme smallholders hectares are 51,353 and total communities are 22,613.</p> <p>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 2020.</p> <p>—</p> <p>Liberia</p> <p>SDP Liberia operation has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was put on-hold due to security &amp; safety issue. After due consideration on the current engagement with the House of Representative in Liberia, the time bound plan of RSPO Certification for SDP Liberia is set to 2019/2020 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process. The progress of the above is under management monitoring for readiness towards certification.</p> <p>SDP has also been addressing the legacy social issues at PT MAS and regularly updating the progress status to resolve this case to RSPO and other relevant stakeholders.</p> <p>However, as at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI). Further info as per website link as following: <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a></p> |   |
| <b>Total SOUs</b> | 33 | 24 | 1 | 58  | <p>Other remarks:</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> |

**SDP - RSPO Certification Status for Malaysia Operations**

| SOU NO | Name of SOU  | Location               | Date Certification | of | End Date of Certification | Certificate Number                          | Remarks |
|--------|--------------|------------------------|--------------------|----|---------------------------|---|---------|
| 1      | Sg. Dingin   | Karangan, Kedah        | 12 Aug '11         |    | 11-Aug-20                 | SPO 550179                                  |         |
| 2      | Chersonese   | Kuala Kurau, Perak     | 5 Oct '11          |    | 4-Oct-21                  | CU-RSPO-815148, RSPO 590800                 |         |
| 3      | Elphil       | Sg Siput, Perak        | 18 Jun '11         |    | 17-Jun-21                 | RSPO 550180                                 |         |
| 4      | Flemington   | Teluk Intan, Perak     | 5 Oct '11          |    | 4-Oct-21                  | CU-RSPO-819144, RSPO 590802                 |         |
| 5      | Seri Intan   | Teluk Intan, Perak     | 3 Mar '11          |    | 2-Mar-21                  | CU-RSPO-811218, RSPO 0015                   |         |
| 5      | Selaba       | Teluk Intan, Perak     | 3 Mar '11          |    | 2-Mar-21                  | CU-RSPO-819142, RSPO 0016                   |         |
| 5a     | Sg Samak     |                        | 3 Mar '11          |    | NA                        | NA  |         |
| 6      | Tennamaram   | Bestari Jaya, Selangor | 3 Mar '11          |    | 2-Mar-21                  | CU-RSPO-819143, RSPO 0014                   |         |
| 7      | Bkt Kerayong | Kapar, Selangor        | 15 Apr '11         |    | 14-Apr-21                 | RSPO 550181                                 |         |
| 8      | East         | Carey Island, Selangor | 19 May '10         |    | 18-May-20                 | SPO 543543                                  |         |
| 9      | West         | Carey Island, Selangor | 19 May '10         |    | 18-May-20                 | SPO 543594                                  |         |
| 9a     | Sepang       | Sepang, Selangor       | 19 May '10         |    | NA                        | NA  |         |
| 10     | Bukit Puteri | Raub, Pahang           | 7 Jul '11          |    | 6-Jul-21                  | CU-RSPO-815147, 18502206 001, 824 502 14020 |         |
| 11     | Kerdu        | Temerloh, Pahang       | 7 Jul '11          |    | 6-Jul-21                  | CU-RSPO-819155, 18502207 001, 824 502 14019 |         |



|     |                 |                               |            |           |   |   |
|-----|-----------------|-------------------------------|------------|-----------|---|---|
| 12  | Jabor           | Kuantan, Pahang               | 7 Jul '11  | 6-Jul-21  | CU-RSPO-819156, RSPO 928288, 824 502 16049  |   |
| 13  | Labu            | Nilai, Negeri Sembilan        | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819163, SGSRSPO/PM/MY13/01284, 824 502<br>16039, SGS-RSPO/PC17-00004, CURSPO-855480 |   |
| 14  | Tanah Merah     | Port Dickson, Negeri Sembilan | 19 May '10 | 18-May-20 | SPO 541905  |   |
| 15  | Sua Betong      | Port Dickson, Negeri Sembilan | 18/2/2014  | 17-Feb-24 | 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 '11  | 6-Jul-21  | CU-RSPO-819157, RSPO 928188, 824 502 16051  |   |
| 17  | Kempas          | Jasin, Melaka                 | 20 May '15 | 19-May-20 | RSPO-PC 00101   |   |
| 18  | Diamond Jubilee | Jasin, Melaka                 | 5 Oct '11  | 4-Oct-21  | CU-RSPO-819146, RSPO 591224   |   |
| 19  | Pagoh           | Muar, Johor                   | 28/1/2014  | 27-Jan-24 | 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 | NA  |   |
| 20  | Chaah           | Chaah, Johor                  | 18 Nov '10 | 17-Nov-20 | RSPO 548299   |   |
| 21  | Gunung Mas      | Kluang, Johor                 | 19 May '10 | 18-May-20 | RSPO 901888   |   |
| 22  | Bukit Benut     | Kluang, Johor                 | 5 Oct '11  | 4-Oct-21  | CU-RSPO-819147, RSPO 591229   |   |
| 23  | Ulu Remis       | Layang-layang, Johor          | 11 Apr '11 | 10-Apr-21 | SGS-RSPO/PM-00722, 824 502 16042  |   |
| 24  | Hadapan         | Layang-layang, Johor          | 29 Mar '11 | 28-Mar-21 | SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01                                       |   |
| 25  | Segaliud        | Sandakan, Sabah               | 20 May '10 | 19-May-15 | NA  |   |
| 26  | Sandakan Bay    | Sandakan, Sabah               | 1 Oct '08  | 30-Sep-23 | RSPO 537872   |   |
| 27  | Melalap         | Tenom, Sabah                  | 21 Jan '11 | 20-Jan-21 | RSPO 547124   |   |
| 28  | Binuang         | Kunak, Sabah                  | 16 Jan '09 | 12-Jul-20 | RSPO 001  |   |
| 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  |   |
| 30b | Mostyn          | Kunak Sabah                   | 16 Jan '09 | NA        | NA  |   |
| 31  | Lavang          | Bintulu, Sarawak              | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819166, MUTU-RSPO/053   |   |
| 32  | Rajawali        | Bintulu, Sarawak              | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819167, RSPO 0020   |   |
| 33  | Derawan         | Bintulu, Sarawak              | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819169, RSPO 0019   |   |
| 34  | Pekaka          | Bintulu, Sarawak              | 30 Dec '11 | 29-Dec-21 | CU-RSPO-815150, MUTU-RSPO/054   | Mill is mothballed, supply base merged into Lavang effective Dec 2017.  |

Legends:

Certification  
Withdrawal

| 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              | 2-Jul-23                  | 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             | 3-Aug-22                  | 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              | 28-Nov-22                 | 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             | 19-Jul-22                 | MUTU-RSPO/016   | Recertification of Pondok Labu POM is in progress.    |
| 10 | PT BERSAMA SEJAHTERA SAKTI   | 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             | 19-Nov-22                 | 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            | 31-Mar-24                 | 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   | Mill is mothballed.                                   |
| 16 | PT BINA SAINS CEMERLANG      | SG PINANG      | Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan                       | 11-Sep-12             | 28-Nov-22                 | 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                            | TELUK BAKAU | Pelangiran, Sg. Guntung, Indragiri Iilir, Riau                    | 01-Dec-16  | 30-Nov-21 | MUTU-RSPO/008 |  |
| 19 | SEJATI  | MANDAH      |   | 1-April-14 | 31-Mar-24 | 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  | 28-Dec-22 | MUTU-RSPO/018 |  |
| 22 | PT SIME INDO AGRO                             | BK AJONG    | Kalimantan Barat, Indonesia                                       | 18-Jul-16  | 17-Jul-21 | MUTU-RSPO/088 |  |
| 23 | PT PADANG PALMA PERMA/PT PERKASA SUBUR SAKTI  | BLANG SIMPO | Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam | 3-May-13   | 2-May-23  | 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-24  | MUTU-RSPO/044 |  |
| 25 | PT MITRAL AUSTRAL SEJAHTERA                   | MAS Mill    | Desa Rahayu Kec. Parindu Kab. Sanggau, Kalimantan Barat           | NA         | NA        | NA            |  |

**Legends**

|                               |                             |                     |
|-------------------------------|-----------------------------|---------------------|
| Pending Certification by RSPO | Mill closed down/Mothballed | NA - NOT APPLICABLE |
|-------------------------------|-----------------------------|---------------------|

**SDP - RSPO Certification for Time Bound Plan - NBPOL Operations**

As at end April 2020

| No                         | Management Unit<br>SOU Name                 | Supply Base                | Time Bound Plan | Location                              | Status    | Certified Date |
|----------------------------|---|----------------------------|-----------------|---------------------------------------|-----------|----------------|
| 1                          | Guadalcanal Plains Palm Oil Limited (GPPOL) | Tetere Oil Mill            | NA              | Guadalcanal Province, Solomon Islands | Certified | 18-Mar-11      |
|                            |   | Tetere Estate              |                 |                                       |           |                |
|                            |   | Ngalimbiu Estate           |                 |                                       |           |                |
|                            |   | Mbalisuna Estate           |                 |                                       |           |                |
|                            |   | Outgrowers – West Zone     |                 |                                       |           |                |
|                            |   | Outgrowers – Central Zone  |                 |                                       |           |                |
|                            |   | Outgrowers – MBA East Zone |                 |                                       |           |                |
| Outgrowers – MBE East Zone |   |                            |                 |                                       |           |                |
| 2                          | Milne Bay Estates (MBE)                     | Hagita Oil Mill            | NA              | Milne Bay Province, Papua New Guinea  | Certified | 15-Feb-18      |
|                            |   | Giligili Estate            |                 |                                       |           |                |
|                            |   | Waigani Estate             |                 |                                       |           |                |
|                            |   | Sagarai Estate             |                 |                                       |           |                |
|                            |   | Padipadi Estate            |                 |                                       |           |                |
|                            |   | Mariawatte Estate          |                 |                                       |           |                |
|                            |   | East Gurney Estate         |                 |                                       |           |                |
|                            |   | West Gurney Estate         |                 |                                       |           |                |
|                            |   | East Sagarai Estate        |                 |                                       |           |                |
| West Sagarai Estate        |   |                            |                 |                                       |           |                |

|   |   |                                    |        |   |           |  |
|---|---|------------------------------------|--------|---|-----------|--|
| 3   | Poliamba (POL)  | Poliamba Oil Mill                  | NA     | New Ireland Province, Papua New Guinea    | Certified | 19-Mar-12  |
|   |   | Kara Estate                        |        |   |           |  |
|   |   | Nalik Estate                       |        |   |           |  |
|   |   | West Coast Estate                  |        |   |           |  |
|   |   | Noatsi Estate                      |        |   |           |  |
|   |   | Madak Estate                       |        |   |           |  |
|   |   | North Smallholders (613)           |        |   |           |  |
|   |   | South Smallholders (863)           |        |   |           |  |
| West Smallholders (309)                     |   |                                    |        |   |           |  |
| 4   | Ramu Agricultural Industries Ltd (RAIL)                       | Gusap Mill                         | NA     | Morobe Province, Papua New Guinea         | Certified | 5-Aug-10   |
|   |   | Gusap East (Gusap) Estate          |        |   |           |  |
|   |   | Gusap West (Paddock) Estate        |        |   |           |  |
|   |   | Surinam Estate                     |        |   |           |  |
|   |   | Dumpu Estate                       |        |   |           |  |
|   |   | Ngaru Estate                       |        |   |           |  |
|   |   | J Estate (Jephcott) Estate         |        |   |           |  |
| 5   | Higaturu Oil Palm (HOP)                                       | Sangara Oil Mill                   | NA     | Oro Bay Province, Papua New Guinea        | Certified | 1-Feb-13   |
|   |   | Mamba Oil Mill                     |        |   |           |  |
|   |   | Embi Estate                        |        |   |           |  |
|   |   | Ambogo Estate                      |        |   |           |  |
|   |   | Sangara Estate                     |        |   |           |  |
|   |   | Sumbiripa Estate                   |        |   |           |  |
| Mamba Estate                                |   |                                    |        |   |           |  |
| 6   | West New Britain (WNB)  | Mosa Oil Mill                      | NA     | Kimbe, West New Britain, Papua New Guinea | Certified | 10-Sep-08  |
|   |   | Kumbango Oil Mill                  |        |   |           |  |
|   |   | Kapiura Mill                       |        |   |           |  |
|   |   | Numundo Mill                       |        |   |           |  |
|   |   | Waraston Mill                      |        |   |           |  |
|   |   | Bebere Estate                      |        |   |           |  |
|   |   | Kumbango Estate                    |        |   |           |  |
|   |   | Togulo Estate                      |        |   |           |  |
|   |   | Dami Estate                        |        |   |           |  |
|   |   | Waisisi Estate                     |        |   |           |  |
|   |   | Kautu Estate                       |        |   |           |  |
|   |   | Karaisu Estate                     |        |   |           |  |
|   |   | Moroa Estate                       |        |   |           |  |
|   |   | Bilomi Estate                      |        |   |           |  |
|   |   | Loata Estate                       |        |   |           |  |
|   |   | Haella Estate                      |        |   |           |  |
|   |   | Garu Estate                        |        |   |           |  |
|   |   | Daliavu Estate                     |        |   |           |  |
|   |   | Sapuri Estate                      |        |   |           |  |
|   |   | Malilimi Estate                    |        |   |           |  |
|   |   | Rigula Estate                      |        |   |           |  |
|   |   | Nomundo Estate                     |        |   |           |  |
|   |   | Navarai / Karato ME /KDC EU Estate |        |   |           |  |
| Volupai / Lotomgam / Natupi / Goruru Estate |   |                                    |        |   |           |  |
| Lolokoru Estate                             |   |                                    |        |   |           |  |
| Ove Estate                                  |   |                                    |        |   |           |  |
| Tamare Estate                               |   |                                    |        |   |           |  |
|   | Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd. | Munum Estate                       | Sep-20 | Markham Farms,                            | RaCP      | The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore the Remediation and Compensation Procedure will be required to be |

| 7  |  |  |                 |                         |             | fulfilled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration.  |
|--|--|--|-----------------|-------------------------|-------------|---|
|  |  | Erap Estate  | Sep-20          |                         | RaCP        |   |
|  |  |  |                 |                         |             |   |
|  | <b>Legends</b><br>Pending Certification<br>NA - NOT APPLICABLE |  |                 |                         |             |   |
| <b>SDP - RSPO Certification for Time Bound Plan - Liberia Operations</b> |  |  |                 |                         |             |   |
| <b>As at end June 2019</b>   |  |  |                 |                         |             |   |
| No   | Management Unit<br>SOU Name                                    | Mill and Supply Base   | Time Bound Plan | Location                | Status      | Remarks   |
| 1  | Sime Darby Plantation (Liberia) Grand Cape Mount               | Grand Cape Mount Mill<br>Bomi Estate<br>Lofa Estate<br>Matambo Estate<br>Grand Cape Mount Estate | 2019            | Grand Cape Mount County | Uncertified | <p>In May – September 2011, SDPL has undergone a series of assessment including Social and Environmental Impact Assessment and High Conservation Value Assessment in conformance with the RSPO New Planting Procedures to begin planting. *Note: RSPO NPP Announcements can be found at <a href="http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?">http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</a></p> <p>SDPL has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put on hold due to security &amp; safety issue.</p> <p>After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process.</p> <p>A letter of Request for Extension of RSPO Certification Time Bound Plan for Sime Darby Plantation dated 22 May was sent to RSPO Secretariat, Head of Certification, and with response to Sime Darby Plantation on 23 May 2019 with no objections on the extension. (Letter and email correspondence as attached)</p> |
|  | <b>Legends</b><br>Pending Certification<br>NA - NOT APPLICABLE |  |                 |                         |             |   |

### Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2019 for Diamond Jubilee Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2019 for Diamond Jubilee Oil Mill and supply base are as following:

| Emission per product | tCO <sub>2</sub> e/tProduct |
|----------------------|-----------------------------|
| CPO                  | 1.25                        |
| PKO                  | 1.25                        |

| Extraction | %     |
|------------|-------|
| OER        | 21.09 |
| KER        | 5.12  |

| Production   | t/yr        |
|--------------|-------------|
| FFB Process  | 134,749.016 |
| CPO Produced | 28,418.57   |
| PKO Produced | 6,899.15    |

| Land Use                    | Ha              |
|-----------------------------|-----------------|
| OP Planted Area             | 6,048.70        |
| OP Planted on peat          | -               |
| Conservation (forested)     | -               |
| Conservation (non-forested) | 23.79           |
| <b>Total</b>                | <b>6,072.49</b> |

### Summary of Field Emission and Sink

|  | Own Crop*          |                          | Group              |                          | 3 <sup>rd</sup> Party |                          | Total              |                          |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
|  | tCO <sub>2</sub> e | tCO <sub>2</sub> e / FFB | tCO <sub>2</sub> e | tCO <sub>2</sub> e / FFB | tCO <sub>2</sub> e    | tCO <sub>2</sub> e / FFB | tCO <sub>2</sub> e | tCO <sub>2</sub> e / FFB |
| <b>Emission</b>                          |                    |                          |                    |                          |                       |                          |                    |                          |
| Land Conversion                          | 61,233.22          | 0.52                     | -                  | -                        | -                     | -                        | 61,233.22          | 0.52                     |
| CO <sub>2</sub> Emission from fertilizer | 6,015.64           | 0.05                     | -                  | -                        | -                     | -                        | 6,015.64           | 0.05                     |
| NO <sub>2</sub> Emission                 | 4,934.16           | 0.04                     | -                  | -                        | -                     | -                        | 4,934.16           | 0.04                     |
| Fuel Consumption                         | 417.42             | 0.00                     | -                  | -                        | -                     | -                        | 417.42             | 0.00                     |
| Peat Oxidation                           | -                  | -                        | -                  | -                        | -                     | -                        | -                  | -                        |
| <b>Sink</b>                              |                    |                          |                    |                          |                       |                          |                    |                          |
| Crop Sequestration                       | - 58,040.96        | - 0.49                   | -                  | -                        | -                     | -                        | 58,040.96          | - 0.49                   |
| Conservation Sequestration               | -                  | -                        | -                  | -                        | -                     | -                        | -                  | -                        |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|              |           |      |   |   |   |   |           |      |
|--------------|-----------|------|---|---|---|---|-----------|------|
| <b>Total</b> | 14,559.49 | 0.12 | - | - | - | - | 14,559.49 | 0.12 |
|--------------|-----------|------|---|---|---|---|-----------|------|

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

|                              | tCO <sub>2</sub> e | tCO <sub>2</sub> e/tFFB |
|------------------------------|--------------------|-------------------------|
| <b>Emission</b>              |                    |                         |
| POME                         | 23,074.12          | 0.20                    |
| Fuel Consumption             | 109.13             | 0.00                    |
| Grid Electricity Utilization | 757.32             | 0.01                    |
| <b>Credit</b>                |                    |                         |
| Export of Grid Electricity   | -                  | -                       |
| Sales of PKS                 | -                  | -                       |
| Sales of EFB                 | -                  | -                       |
| <b>Total</b>                 | 23,940.56          | 0.20                    |

**Summary of Kernel Crusher Emission and Credit (if applicable)**

| Emissions                      | tCO <sub>2</sub> e |
|--------------------------------|--------------------|
| PK from own mill               | -                  |
| PK from other source           | -                  |
| Fuel Consumptions              | -                  |
| <b>Total Crusher emissions</b> | -                  |

\*This mill has no kernel crusher operation.

| <b>Palm Oil Mill Effluent (POME) Treatment:</b> |     |
|---|-----|
| Divert to Compost (%)                           | -   |
| Divert to anaerobic diversion (%)               | 100 |

| <b>POME Diverted to Anaerobic Digestion:</b>       |     |
|--|-----|
| Divert to anaerobic pond (%)                       | 100 |
| Divert to methane captured (flaring) (%)           | -   |
| Divert to methane captured (energy generation) (%) | -   |

**Appendix D: Supply Chain Declaration**

| <b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b> |                     |   |   |                             |
|--|---------------------|---|---|-----------------------------|
| <b>No.</b>   | <b>Month - Year</b> | <b>Volume of FFB from certified supply bases (mt)</b> | <b>Volume of FFB from uncertified supply bases (mt)</b> | <b>Total FFB/Month (mt)</b> |
| 1  | Aug 2019            | 9,496.55  | 0.00  | 9,496.55                    |
| 2  | Sept 2019           | 7,377.12  | 0.00  | 7,377.12                    |
| 3  | Oct 2019            | 8,231.50  | 0.00  | 8,231.50                    |
| 4  | Nov 2019            | 5,773.02  | 0.00  | 5,773.02                    |
| 5  | Dec 2019            | 4,623.87  | 0.00  | 4,623.87                    |
| 6  | Jan 2020            | 4,365.19  | 0.00  | 4,365.19                    |
| 7  | Feb 2020            | 6,942.77  | 0.00  | 6,942.77                    |
| 8  | March 2020          | 7,741.27  | 0.00  | 7,741.27                    |
| 9  | April 2020          | 9,708.55  | 0.00  | 9,708.55                    |
| 10   | May 2020            | 10,194.56   | 0.00  | 10,194.56                   |
| 11   | June 2020           | 11,286.30   | 0.00  | 11,286.30                   |
| <b>Total</b>   |                     | <b>85,740.70</b>                                      | <b>0.00</b>   | <b>85,740.70</b>            |

| <b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b> |                     |                           |                          |
|--|---------------------|---------------------------|--------------------------|
| <b>No.</b>   | <b>Month - Year</b> | <b>Certified CPO (mt)</b> | <b>Certified PK (mt)</b> |
| 1  | Aug 2019            | 2,162.64                  | 556.86                   |
| 2  | Sept 2019           | 1,671.30                  | 399.081                  |
| 3  | Oct 2019            | 1,772.83                  | 461.86                   |
| 4  | Nov 2019            | 1,327.68                  | 314.235                  |
| 5  | Dec 2019            | 993.047                   | 220.168                  |
| 6  | Jan 2020            | 936.543                   | 249.782                  |
| 7  | Feb 2020            | 1,442.22                  | 395.307                  |
| 8  | March 2020          | 1,612.93                  | 429.043                  |
| 9  | April 2020          | 1,954.78                  | 504.585                  |
| 10   | May 2020            | 2,065.85                  | 328.515                  |
| 11   | June 2020           | 2,331.39                  | 627.345                  |
| <b>Total</b>   |                     | <b>18,271.21</b>          | <b>4,486.78</b>          |



**RSP0 P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

| C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) |                   |             |  |                         |                        |
|---|-------------------|-------------|--|-------------------------|------------------------|
| No.   | Month- Year       | Buyers Name | Palmtrace Trading License Number   | Certified CPO Sold (mt) | Certified PK Sold (mt) |
| 1   | Aug 2019          | A           | TR-0b5170cd-6910<br>TR-0846f31d-8810<br>TR-2ffae8a1-ad95<br>TR-68d2fd66-2cc7   | 968.38                  | -                      |
| 2   | Aug 2019-Jun 2020 | B           | TR-e62e84ab-b410<br>TR-c923c737-f95a<br>TR-2846237a-67e9<br>TR-78f2c025-e38e<br>TR-0c0f78f6-7c56<br>TR-f82e631f-db0a<br>TR-f60fee06-8f70<br>TR-856442b6-255b<br>TR-2a560cf8-9b17<br>TR-acdde171-fbb9<br>TR-91d7e02f-32f2<br>TR-b542aca2-cb9d<br>TR-39e5c930-8b2f<br>TR-d6f4432e-065e<br>TR-3b52ffef-7cb6<br>TR-00272de7-d56a<br>TR-59d45379-124e<br>TR-42de47ce-daa0<br>TR-b56be065-2134<br>TR-7bf732e1-143b<br>TR-8a1a3fdb-b703<br>TR-678d8c87-6693<br>TR-34bcd7db-05a8<br>TR-fec5eb95-ae43<br>TR-f9fb97f4-3dee<br>TR-a8efc03c-b20b<br>TR-c2932edb-193f<br>TR-4461d75d-560e<br>TR-4fca0f06-3006 | 13, 395.15              | -                      |

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|  |  |  |  |  |  |
|--|--|--|--|--|--|
|  |  |  | TR-72cf9926-1431<br>TR-323ba2d9-6517<br>TR-c3eaaab7-4aa4<br>TR-6a65c544-0221<br>TR-2d9868d1-25cc<br>TR-ca827fa5-6af4<br>TR-2247df6c-978e<br>TR-6594dff0-89ef<br>TR-a01a0fdc-3cde<br>TR-7d97f4df-1463<br>TR-cb060e1c-573d<br>TR-8d8e5ba3-5bd2<br>TR-907ecac0-82f2<br>TR-70f5ad5e-0a10<br>TR-2063f03e-5702<br>TR-1f2bfa98-8c8c<br>TR-f602db8b-358e<br>TR-178ed9e1-1e87<br>TR-e11a6006-d146<br>TR-89ec2516-c1df<br>TR-69fb93f6-79ae<br>TR-4eb85d6d-03c0<br>TR-2fd4780d-60f9<br>TR-04cc717c-bf4f<br>TR-24e3bbac-7348<br>TR-68c51526-5f05<br>TR-7a98ffae-77a5<br>TR-0a448c84-36ed<br>TR-74870cb0-c175<br>TR-2abceecb-b956<br>TR-cf1df8c8-22ba<br>TR-fb850f05-3cb3<br>TR-9e6c15fd-c646<br>TR-de83da9f-eed0<br>TR-3f5dc932-2b72<br>TR-c0220f60-32f3<br>TR-5f6f1340-fafa |  |  |
|--|--|--|--|--|--|

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|  |  |  |  |  |  |
|--|--|--|--|--|--|
|  |  |  | TR-ef575228-b436<br>TR-f092f101-5364<br>TR-ba42dfb0-b605<br>TR-d7a2c267-a017<br>TR-3eb5f869-983c<br>TR-fa35c0d5-67f6<br>TR-5479136e-0fe3<br>TR-6a2643a1-d6af<br>TR-8aa7c611-d5ca<br>TR-85a6771b-1cb8<br>TR-ebc18386-ce0f<br>TR-2a9dd057-dd3a<br>TR-6a57a94d-208c<br>TR-11d7502d-d230<br>TR-fd785f4d-aeac<br>TR-a60e490d-1241<br>TR-bbaaa175-f010<br>TR-82221e0d-4ebc<br>TR-664e16ca-0330<br>TR-5a7e4dc6-bd2f<br>TR-ee960404-caa2<br>TR-b9f04f25-2faf<br>TR-a4cb8600-33ab<br>TR-3d19dd37-9b67<br>TR-f6146815-7be5<br>TR-2a300ada-a74e<br>TR-c266d0c5-c1fe<br>TR-30bc671c-f71a<br>TR-1191377a-b70e<br>TR-ad7a0e13-0159<br>TR-5e28882a-4a2f<br>TR-c3f7c7d3-74aa<br>TR-957e373c-8da3<br>TR-eed73c31-1fd5<br>TR-f3dfb610-6ad0<br>TR-7454ed6e-6390<br>TR-22fb23f2-c773 |  |  |
|--|--|--|--|--|--|

**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

|   |                   |   |  |          |        |
|---|-------------------|---|--|----------|--------|
|   |                   |   | TR-0b88d5bc-8a73<br>TR-26c4615f-3bda<br>TR-ee663518-492e<br>TR-4f4c46c0-891b<br>TR-c927800a-be36<br>TR-e86d39f8-0c26<br>TR-e067f4ae-79fc<br>TR-a750f49c-598a<br>TR-05071faa-9430<br>TR-24c6af98-8052<br>TR-88af9b9e-9de7<br>TR-c1868c8b-8c2e<br>TR-095c8042-5fb7<br>TR-87d4c858-a6a5<br>TR-84635eae-4360<br>TR-197fbc0a-4f2c<br>TR-d19aa5d1-956b<br>TR-37ae8465-6913<br>TR-2140ab37-a592<br>TR-1dca2d4e-8e80<br>TR-0b9d244f-e4bd<br>TR-c2992b43-16c8<br>TR-eaecc97d-e10b<br>TR-3aa19e39-25b2<br>TR-0c0fb33e-3404<br>TR-ec728c1b-a9a1<br>TR-07acca3c-d6c9<br>TR-bb23ae94-b9af<br>TR-9f6d3b56-ea74<br>TR-341d2713-e47c<br>TR-1ae43649-f7dc |          |        |
| 3 | Aug 2019-Jun 2020 | C | TR-dabad825-2c06<br>TR-65a70bc1-8922<br>TR-afb99b0e-5958<br>TR-31995605-b675<br>TR-33cf7ab5-c5de   | -        | 983.90 |
|   | TOTAL             |   |  | 14364.33 | 983.90 |

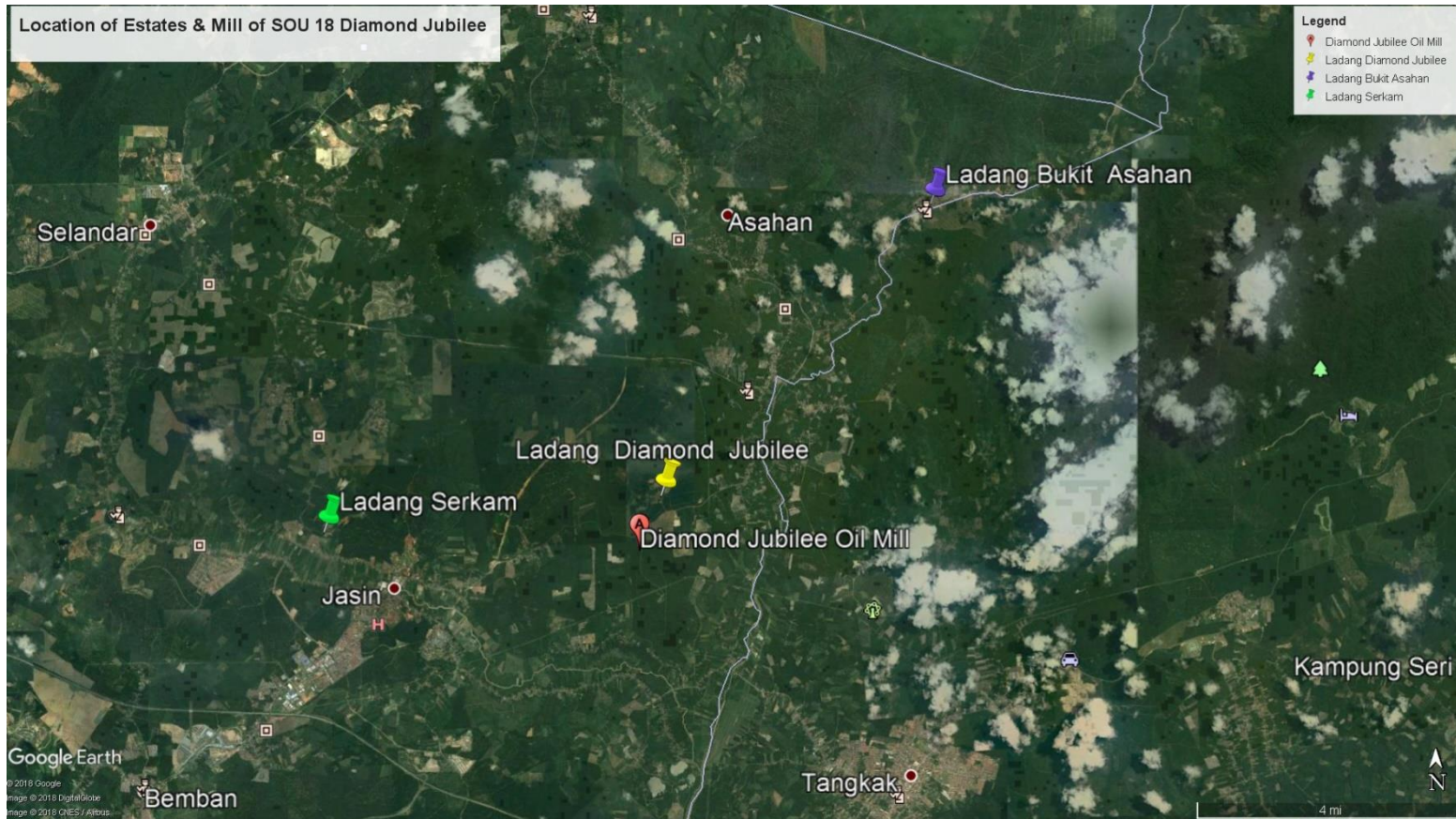
**RSPO P&C Public Summary Report**  
**Revision 10 (Mar 2020)**

| <b>D. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b> |                    |                    |                      |                     |
|--|--------------------|--------------------|----------------------|---------------------|
| <b>No.</b>   | <b>Buyers Name</b> | <b>Scheme Name</b> | <b>CPO Sold (mt)</b> | <b>PK Sold (mt)</b> |
| Nil  | n/a                | n/a                | -                    | -                   |
| Total  |                    |                    | -                    | -                   |

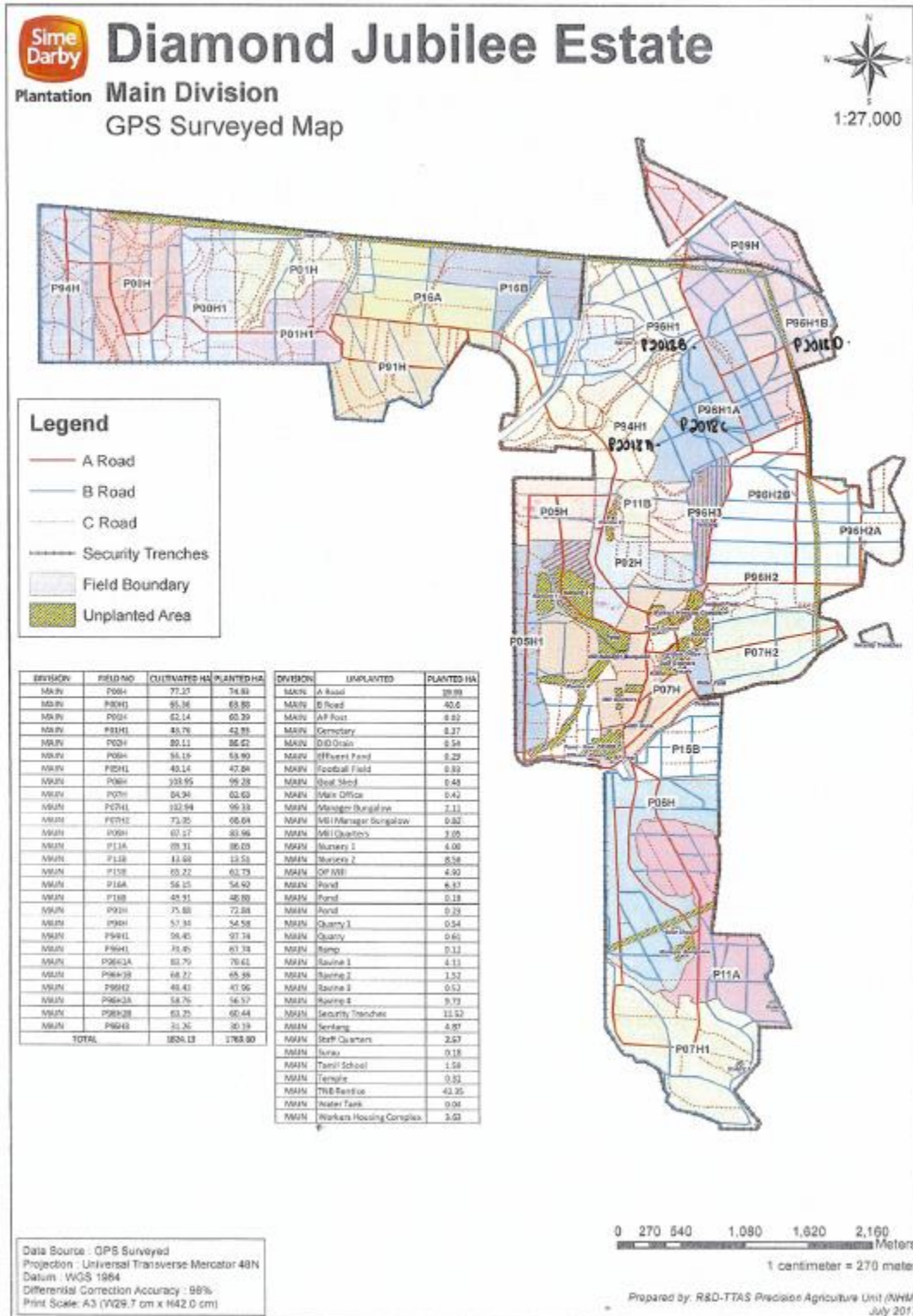
| <b>E. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b> |                    |                      |                     |
|--|--------------------|----------------------|---------------------|
| <b>No.</b>   | <b>Buyers Name</b> | <b>CPO Sold (mt)</b> | <b>PK Sold (mt)</b> |
| 1  | B                  | 804.13               | -                   |
| 2  | C                  | -                    | 688.55              |
| Total  |                    | 804.13               | 688.55              |

| <b>F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b> |                    |   |  |
|--|--------------------|---|--|
| <b>No.</b>   | <b>Buyers Name</b> | <b>PalmTrace Trading License Number</b> | <b>RSPO Credits of Certified CPO Sold (mt)</b> |
| Nil  | n/a                | n/a                                     | n/a  |

**Appendix E: Location Map of Certification Unit and Supply bases**



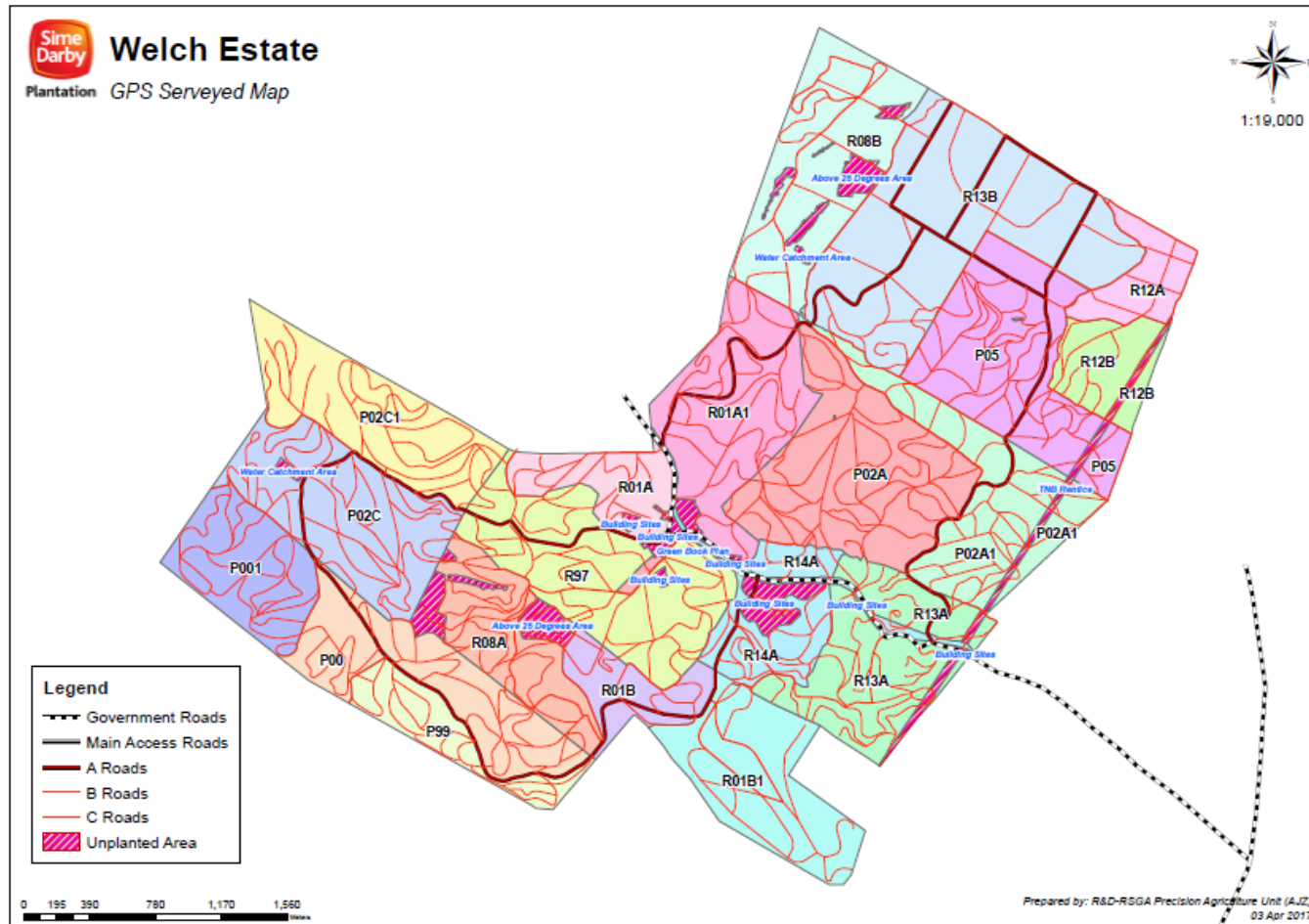
**Appendix F: Diamond Jubilee Estate Field Map**







Appendix H: Welch Estate Field Map



**Appendix I: List of Smallholder Sampled**

Not applicable

## Appendix J: List of Abbreviations

|            |  |
|------------|--|
| a.i        | Active Ingredient  |
| BOD        | Biochemical Oxygen Demand  |
| CB         | Certification Bodies   |
| CHRA       | Chemical Health Risk Assessment                                    |
| COD        | Chemical Oxygen Demand   |
| CPO        | Crude Palm Oil   |
| CSPO       | Certified Sustainable Palm Oil                                     |
| CSPKO      | Certified Sustainable Palm Kernel Oil                              |
| DJPOM      | Diamond Jubilee Palm Oil Mill                                      |
| EFB        | Empty Fruit Bunch  |
| EHS        | Environmental, Health and Safety                                   |
| EIA        | Environmental Impact Assessment                                    |
| EMS        | Environmental Management System                                    |
| FFB        | Fresh Fruit Bunch  |
| FPIC       | Free, Prior, Informed and Consent                                  |
| GAP        | Good Agricultural Practice   |
| GHG        | Greenhouse Gas   |
| GMP        | Good Manufacturing Practice  |
| GPS        | Global Positioning System  |
| HCV        | High Conservation Value  |
| IPM        | Integrated Pest Management   |
| IP         | Identity Preserved   |
| IS - CSPO  | Independent Smallholder Certified Sustainable Palm Oil             |
| IS – CSPKO | Independent Smallholder Certified Sustainable Palm Kernel Oil      |
| IS – CSPKE | Independent Smallholder Certified Sustainable Palm Kernel Expeller |
| ISCC       | International Sustainable Carbon Certification                     |
| LD50       | Lethal Dose for 50 sample  |
| MB         | Mass Balance   |
| MSDS       | Material Safety Data Sheet   |
| MT         | Metric Tonnes  |
| OER        | Oil Extraction Rate  |
| OSH        | Occupational Safety and Health                                     |
| PK         | Palm Kernel  |
| PKO        | Palm Kernel Oil  |
| POM        | Palm Oil Mill  |
| POME       | Palm Oil Mill Effluent   |
| PPE        | Personal Protective Equipment                                      |
| RSPO       | Roundtable on Sustainable Palm Oil                                 |
| P&C        | Principles & Criteria  |
| RTE        | Rare, Threatened or Endangered species                             |
| SCCS       | Supply Chain Certification Standard                                |
| SEIA       | Social & Environmental Impact Assessment                           |
| SEJIA      | Social & Environmental Jurisdiction Impact Assessment              |
| SIA        | Social Impact Assessment   |
| SOP        | Standard Operating Procedure                                       |