

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1_4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

<p>Client Company name (Parent Company): Sime Darby Plantation Berhad</p>
<p>Client company Address: Level 5, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia</p>
<p>Certification Unit: Strategic Operating Unit (SOU 22) – Bukit Benut Palm Oil Mill Location of Certification Unit: KM 12, Jalan Mengkibol 86009 Kluang, Johor, Malaysia</p>
<p>Date of Final Report: 4/1/2021</p>

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Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	Sime Darby Plantation Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 5, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 22) – Bukit Benut Palm Oil Mill		
Location / Address	KM 12, Jalan Mengkibol 86009 Kluang, Johor, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr. Anuar bin Zakaria (Mill Manager)	E-mail	shylaja.vasudevan@simedarbyplantation.com kks.bk.benut@simedarbyplantation.com
Telephone	+603 78484379 (Head Office) +6013-2086959 (Mill)	Facsimile	+603 78484363 (Head Office) +607-7766479 (Mill)

2. Certification Information			
Certificate Number	RSPO 591229	Date of First Certification	05/10/2011
		Certificate Start Date	05/10/2016
		Certificate Expiry Date	04/10/2021
Scope of Certification	Palm oil and Palm Kernel Production		
Visit Objectives	The objective of the assessment was to conduct an annual surveillance assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system.		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 1 ; ASA 4) <input type="checkbox"/> Scope Extension		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		

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Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance
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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682040	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	27/12/2022
MSPO 686845	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		27/12/2022
MSPO 714131	MSPO Supply Chain Certification: 2018		17/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Benut Palm Oil Mill	KM 12, Jalan Mengkibol, 86009 Kluang, Johor	1° 56' 00" N	103° 20' 28" E
Bukit Benut Estate	KM 12, Jalan Mengkibol, 86009 Kluang, Johor	1° 54' 42" N	103° 21' 54" E
CEP Niyor Estate	Ladang CEP Niyor 86009 Kluang, Johor	1° 54' 30" N	103° 16' 22" E
Lambak Estate	Ladang Lambak/Elais 86009 Kluang, Johor	1° 58' 43" N	103° 19' 08" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Benut Estate	2,536.70	24.18	238.90	2,799.78	90.55
CEP Niyor Estate	1,880.68	6.11	68.40	1,955.19	95.30
Lambak Estate	3,387.92	2.65	349.59	3,740.16	90.47
Total	7,805.3	32.94	656.89	8,495.13	

Notes:

Bukit Benut Estate & CEP Niyor Estate = The figures given in the previous assessment report were inaccurate. Hence the difference.

Lambak Estate = Additional planted area of 67.11 (replanting at reopen area).

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6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Benut Estate	230.48	997.72	964.59	343.91	0	2,306.22	230.48
CEP Niyor Estate	152.05	842.84	823.4	62.39	0	1,728.63	152.05
Lambak Estate	560.04	845.31	1743.04	239.53	0	2,827.88	560.04
Total (ha)	942.57	2,685.87	3530.31	645.83	0	6,862.73	942.57

Note: Lambak Estate = Additional planted area of 67.11 (replanting at reopen area).

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Oct 2019-Sept 2020)	Actual (August 2019-June 2020)		Forecast (Oct 2020-Sept 2021)
		Previous license period (Aug 2019 – Sep 2019)	Current license period (Oct 2019 – Jun 2020)	
Bukit Benut Estate	54,272.00	8406.52	32,057.49	51,982.71
CEP Niyor Estate	4,909.00	501.87	1,913.83	28,800.00
Lambak Estate	79,400.00	11081.52	42,258.30	66,649.18
Total	138,581.00	96,219.53		147,431.89

Note:

8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			
	Estimated (Oct 2019-Sept 2020)	Actual (August 2019-June 2020)		Forecast (Oct 2020-Sept 2021)
		Previous license period (Aug 2019 – Sep 2019)	Current license period (Oct 2019 – Jun 2020)	
Cep Rengam Estate		4,699.77	0.00	
Tun Dr Ismail Estate		540.35	0.00	
Ulu Remis Estate		664.64	0.00	
Cenas Estate		380.29	0.00	
Bukit Badak Estate		63.3	0.00	
Sembrong Estate		26.7	0.00	
Pekan Estate		186.6	0.00	

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Total	6,561.65
Note:	

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated (Oct 2019-Sept 2020)	Actual (August 2019-June 2020)		Forecast (Oct 2020-Sept 2021)
		<i>Previous license period</i> (Aug 2019 – Sep 2019)	<i>Current license period</i> (Oct 2019 – Jun 2020)	
N/A	N/A	N/A	N/A	N/A
Note: N/A				

10. Certified Tonnage				
	Estimated (Oct 2019-Sept 2020)	Actual (August 2019-June 2020)		Forecast (Oct 2020-Sept 2021)
	FFB	FFB		FFB
Mill Capacity: 20 MT/hr	138,581.00	<i>Previous license period</i> (Aug 2019 – Sep 2019)	<i>Current license period</i> (Oct 2019 – Jun 2020)	147,431.89
		26,551.56	76,229.62	
	CPO (OER: 21.40 %)	CPO (OER: 20.51%)		CPO (OER: 21.00 %)
	29,656.33	5,445.72	15,634.70	30,960.70
	PK (KER: 5.50 %)	PK (KER: 4.94%)		PK (KER: 4.50 %)
	7,621.96	1,311.65	3,765.74	6,634.44
	TOTAL	N/A		
Note:				

11. Actual Sold Volume (CPO)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	8,945.67	0.00	0.00	898.84	9,844.51
Previous License period					

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CPO (MT)	5,149.01	0.00	0.00	0.00	5,149.01
Total	14,094.68	0.00	0.00	898.84	14,993.52

12. Actual Sold Volume (PK)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	200.00	0.00	0.00	2,129.44	2,329.44
Previous License period					
PK (MT)	0.00	0.00	0.00	0.00	0.00
Total	200.00	0.00	0.00	2,129.44	2,329.44

13. Independent Smallholders Certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	0.00	0.00
IS-CSPKO	0.00	0.00
IS-CSPKE	0.00	0.00

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)
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BSI is a leading global provider of management systems assessment and certification, with more than 84,000 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.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 20/7/2020 – 23/7/2020. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2018 (MYNI 2019) for the Production of Sustainable Palm Oil was used to guide the assessment of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (and 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 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.

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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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Bukit Benut Palm Oil Mill	X	X	X	X	X
Bukit Benut Estate	X	X	X	X	X
Lambak Estate	X		X	X	X
CEP Niyor	-	X	X	X	X

Tentative Date of Next Visit: July 5, 2021 - July 8, 2021

Total No. of Mandays: 12 mandays

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Muhammad Fadzli Masran	Team Leader	He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. Fluent in Bahasa Malaysia and English Language. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and SCC for CPO mill.

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Hafriazhar Mohd Mokhtar	Team Member	He holds Bachelor Degree in Chemical Engineer. 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 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 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 and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands and Gabon. He is fluent in Bahasa Malaysia and English languages. During this assessment, she assessed on the aspects of social, legal, workers & stakeholders consultation and SCC for CPO mill.
Amir Bahari	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered the aspects of mills and estates best practices, workers consultation and environmental. He is fluent in both verbal/written in Bahasa Malaysia and English.

Accompanying Persons:

Name	Role
Mohamed Hidhir Zainal Abidin	Qualifying reviewer

2.3 Assessment Plan

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

Date	Time	Subjects	MFM	HMM	AB	MHZA
Sunday 19/07/2020	PM	Audit Team Travelling	√	√	√	√
Monday 20/07/2020	08.30 – 9.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan 	√	√	√	√
Bukit Benut Estate	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√	√
	9.30 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√		
	12.30 – 13.30	Lunch	√	√	√	√

	13.30 – 16.30	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√	√
Tuesday 21/07/2020 Lambak Estate	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√	√
	9.30 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√		
	12.30 – 13.30	Lunch	√	√	√	√
	13.30 – 16.30	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√	√
Wednesda y 22/07/2020 Bukit Benut POM	08.30 – 12.30	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√	√
	09.00 – 13.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√		
	12.30 – 13.30	Lunch	√	√	√	√
	13.30 – 16.30	Lab, weighbridge and palm product storage area. Document Review P1 – P7: 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. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√	√

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Thursday 23/07/2020 CEP Niyor Estate	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√	√
	9.30 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√		
	12.30 – 13.30	Lunch	√	√	√	√
	13.30 – 16.30	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√	√
	16.30 – 17.00	Preparation of audit report	√	√	√	√
	17.00 – 17.30	Closing Meeting	√	√	√	√
	PM	Audit Team Travelling to Kuala Lumpur	√	√	√	√

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. Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table. As at 16/1/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation -Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations	Complied

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<p>Have all the estates and mills certified within five years after obtaining RSPO membership?</p>	<p>Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1/10/2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera was sold and currently Sime Darby Plantation Berhad have no control in the management.</p>	<p>Complied</p>
<p>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.</p>	<p>No. There is no new acquisitions as at latest TBP 2020.</p>	<p>Complied</p>
<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. Is this consistent with the ACOP reporting?</p>	<p>Yes.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.</p> <p>PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/6/ 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27/6/2019. 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>Malaysia - Pekaka Mill is being mothballed (at the time of Sime Darby Plantation Berhad Annual Report 2018) and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being</p>	<p>Complied</p>

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	<p>initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public notification letter: https://www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16/1/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p> <p>ACOP 2019 has been cross-referenced as below: https://www.rspo.org/members/29/Sime-Darby-Plantation-Berhad</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>No 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 Major non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings <i>(any non-compliance against the below shall be raised as Major Non-compliance)</i></p>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<p>HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>No new plantings. As at 16/1/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p>	<p>Complied</p>

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	http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations	
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&C criteria 2.2, 6.4, 7.5 and 7.6. <i>Note:</i> <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported. Please refer to BSI-RSPO Secretariat approval.</i>	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above. This is further check in the website: https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . Management units with potential liability is 17 and a total of 15 management units has submitted the LUCA to RSPO.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No stakeholder comments or complaints received.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	None noted. All legal requirements has been addressed as per RSPO P&C criteria 2.1	Complied
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes. The sustainability unit has conducted the internal audit for 9 units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. Other than that, land conflicts and land disputes also being audited and approved by Head of Sustainability-Indonesia (Alagendran Maniam) on 22/05/2019. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	None noted. No stakeholder comments or complaints received.	Complied

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

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? 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 as there is no smallholder scheme under SOU 22 Bukit Benut POM and supply base Certification Unit	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 no (0) Critical; two (2) Minor nonconformities and two (2) Opportunity For Improvement raised. The SOU 22 Bukit Benut POM 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 Critical Nonconformity(ies) has been verified for it effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	1930317-202007-N1	Clause & Category (Critical / Minor)	7.3.2 Non – critical (Minor)
Date Issued	23/7/2020	Due Date	Next surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement of Nonconformity:	The understanding of the disposal materials into the landfill was not fully understood to comply with the Operational Control Procedure for Landfill Management In Estate (SD/SDP/PSQM(ESH)203-EN7) dated 13th march 2017		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Lambak Estate During the site visit to the landfill it was sighted that there were several motor oil containers (2T/4T Oil) disposed in the domestic waste landfill.		
Corrections:	Estate has removed the empty motor oil containers (2T/4T Oil) from the landfill and store it in the scheduled waste store and will dispose accordingly together with other scheduled wastes.		

Root Cause Analysis:	The issue happened due to empty motor oil containers (2T/4T Oil) was not generated from estate's operation activity hence estate did not pick that up as part of estate's operation generated waste or scheduled waste in their waste monitoring. The waste possibly generated by outsider/workers at linesite area. Linesite inspection did not cover on the monitoring of waste that should not be generated in the linesite area
Corrective Actions:	Estate will conduct briefing on waste management to all the workers and contractors which includes to inform them what type of waste should not be generated at linesite. Estate also will include checking on wastes that should not be generated at linesite area in the weekly linesite inspection
Assessment Conclusion:	The effectiveness of the implementation will be verified during next assessment.

Non-conformity			
NCR Ref #	1930317-202007-N2	Clause & Category (Critical / Minor)	7.3.2 Non – critical (Minor)
Date Issued	23/7/2020	Due Date	Next surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement of Nonconformity:	The monitoring of the Pollution Controlled Device effectiveness and Waste Management Plan 2020 was not effectively implemented		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Objective Evidence:	CEP Niyor Estate During the site visit to the workshop it was sighted that the Pollution Controlled Device (Oil Trap) was not able trap the oil from the parts washing area as per Waste Management Plan 2020 action plan in for workshop.		
Corrections:	Estate to clean up the traces of oil found at the oil trap.		
Root Cause Analysis:	Due to rainy season, excessive water has overflowed from the oil trap and caused traces of oil to flow at last compartment of the oil trap. Monitoring of oil trap was also found not adequately done on regular basis .		
Corrective Actions:	Weekly monitoring will be done by estate's foreman to ensure the oil trap at workshop area is working efficiently.		
Assessment Conclusion:	The effectiveness of the implementation will be verified during next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	6.2.4 Implementation of workers' housing (line site) weekly inspection within operating units using the "Housing Complex/Nest/Community Hall Inspections" form could be further improved its consistency of

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	information reported to reflect actual conditions and/or situation of whole or specific area/building/house within the operating units.
OFI 2	3.4.3 Potential social aspects/issues related to housing/living conditions based on results of implementation of workers' housing (line site) weekly inspection could be alternative inputs to Social Impact Assessment to be managed better in absence of any grievance and/or complaints from workers themselves

Positive Findings	
PF #	Description
PF 1	N/A

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1805554-201903-M1	Clause & Category (Critical / Minor)	4.4.2 - Critical (Major)
Closed (Yes / No)	Yes	Date of nonconformity Closure	2/10/2019
Statement of Nonconformity:	The established riparian buffer zone was not effectively maintain		
Requirement Reference:	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.		
Objective Evidence:	The estate have established riparian buffer zone for Sungai Melantai at P10 C-5. During site visit at the riparian buffer zone, at water sampling point no 3 , there is evidence of chemical application along the riparian buffer zone established. In addition, the water sampling results for IE722/2019 dated 17/7/2019 and IE358/2019 dated 4/4/2019 was not conform to class IIA and IIB NWQS for natural waterways		
Corrective Actions:	Refresher training will be conducted regularly and patrolling by AP once a month to ensure spraying activity is not conducted at buffer zone area and to ensure marking is always visible.		
Assessment Conclusion:	Major NC close out verification: i) Site verification P10C-5 has confirmed that the buffer zone area is now clearly demarcated with white painted circle and erection of signage at site and clearly visible. ii) Latest training for dated 31/7/19 was sighted. This was further verified during interview with workers, mandore and AP on the understanding of buffer zone demarcation. iii) Monitoring of buffer zone was done by person in charge and AP. Latest monitoring records for September 2019 was checked. Based on the records AP patrolling, HCV checklist, no evidence of maintenance activity (spraying/manuring etc) found at buffer zone area.		

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	<p>Corrective action taken is found to be effective, thus the major NC is closed on 2/10/19. Continuous implementation will be further verified in the next audit.</p> <p>ASA1_4 verification</p> <p>No reoccurrence of non-conformity. The evidences sighted found adequate and effectively implemented. Thus, the Major NC was effectively closed.</p>
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Non-conformity																																							
NCR Ref #	1805554-201903-M2	Clause & Category (Critical / Minor)	2.1.3 - Critical (Major)																																				
Closed (Yes / No)	Yes	Date of nonconformity Closure	2/10/2019																																				
Statement of Nonconformity:	Mechanism to ensure the compliance was not implemented effectively.																																						
Requirement Reference:	A mechanism for ensuring compliance shall be implemented.																																						
Objective Evidence:	<p>As per the approval from JTK for the maximum overtime of 130 hours per month, the workers are not allowed to work more than 4 hours of overtime if work on rest day, public holiday and replacement of public holiday under Section (ii). However, document reviewed on the Daily Input Form in Bukit Benut POM found that the following workers worked more than 4 hours during work on rest day and public holiday.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Employee No.</th> <th style="width: 33%;">Date</th> <th style="width: 33%;">Hours of Overtime</th> </tr> </thead> <tbody> <tr><td>17465</td><td>21/1/2019</td><td>16</td></tr> <tr><td>17490</td><td>2/6/2019</td><td>10</td></tr> <tr><td>17498</td><td>2/6/2019</td><td>10</td></tr> <tr><td>17491</td><td>2/6/2019</td><td>8</td></tr> <tr><td>17503</td><td>2/6/2019</td><td>8</td></tr> <tr><td>124553</td><td>2/6/2019</td><td>10</td></tr> <tr><td>129037</td><td>2/6/2019</td><td>10</td></tr> <tr><td>136775</td><td>2/6/2019</td><td>10</td></tr> <tr><td>127198</td><td>16/6/2019</td><td>8</td></tr> <tr><td>129483</td><td>16/6/2019</td><td>8</td></tr> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table> <p>Besides, one worker (Employee No.: 17470) found that continuously worked 48 hours from 14/1/2019 to 15/1/2019 as verified the punch card and Daily Input Form/ Overtime Request Form. He worked 8 hours normal working hour and 16 hours of overtime for two days consecutively. Interviewed with the worker told</p>			Employee No.	Date	Hours of Overtime	17465	21/1/2019	16	17490	2/6/2019	10	17498	2/6/2019	10	17491	2/6/2019	8	17503	2/6/2019	8	124553	2/6/2019	10	129037	2/6/2019	10	136775	2/6/2019	10	127198	16/6/2019	8	129483	16/6/2019	8			
Employee No.	Date	Hours of Overtime																																					
17465	21/1/2019	16																																					
17490	2/6/2019	10																																					
17498	2/6/2019	10																																					
17491	2/6/2019	8																																					
17503	2/6/2019	8																																					
124553	2/6/2019	10																																					
129037	2/6/2019	10																																					
136775	2/6/2019	10																																					
127198	16/6/2019	8																																					
129483	16/6/2019	8																																					

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	<p>that he has rested 3.5 – 4 hours in the canteen. No evidence to show that the worker has enough rest to continue to continue to work for the next day.</p> <p>Due to the recurring minor non-compliances on the same indicator occurred in successive surveillance audit, thus the minor upgraded to major as per RSPO P&C certification system requirements June 2017.</p>
Corrective Actions:	<p>i. Mill has started the consent form for working on Rest Day/Public Holiday in March 2019 as per IOM dated 26/02/2019 from Head, Plantation Upstream Malaysia.</p> <p>ii. Mill already registered 2 fireman to seat for second grade boilerman examination. Herewith reference no for the said fireman JH/OYKDES/19/00697 & JH/OYKDES/19/00696</p> <p>iii. Mill has established record for break time in mill which workers & staff whoever take break time inside the mill.</p>
Assessment Conclusion:	<p>Major NC close out verification:</p> <p>i) Consent form for working on Rest Day/Public Holiday in March 2019 as per IOM dated 26/02/2019 from Head, Plantation Upstream Malaysia has been fully implemented. Verified consent form application dated 18/8/19, 25/8/19, 7/9/19 and 22/9/19.</p> <p>ii) 2 fireman were registered for engine driver grade 2 examination on 1st October 2019. Refer to application letter; JH/OYKDES/19/00697 & JH/OYKDES/19/00696.</p> <p>iii) Break time record for August and September 2019 were verified. Hours of break time recorded and acknowledged by mill chargehand.</p> <p>iv) Check roll for August and September 2019 has shown no overtime exceeding 4 hours on rest day and public holiday. Monitoring of overtime is by the consent form to ensure approval was made prior to overtime on daily basis. This has been confirmed during interview with workers from boiler station and oil room on the current control mechanism for overtime.</p> <p>Corrective action taken is found to be effective, thus the major NC is closed on 2/10/19. Continuous implementation will be further verified in the next audit.</p> <p>ASA1_4 verification</p> <p>No reoccurrence of non-conformity. The evidences sighted found adequate and effectively implemented. Thus, the Major NC was effectively closed.</p>

Non-conformity			
NCR Ref #	1805554-201903-M3	Clause & Category (Critical / Minor)	RSPO SCCS D 4.2 - Critical (Major)
Closed (Yes / No)	Yes	Date of nonconformity Closure	2/10/2019
Statement of Nonconformity:	No extension of volume requested for projected overproduction of certified tonnage.		
Requirement Reference:	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.		

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Objective Evidence:	Overproduction of certified tonnage recorded for the actual volume from July 2018 until July 2019; 134,919.13 mt which exceeded the registered certified tonnage of 121,332.60 mt.
Corrective Actions:	Mill to establish production monitoring template as to notify mill management if current production has reach 80% against registered tonnage.
Assessment Conclusion:	<p>Major NC close out verification:</p> <p>i) Volume extension was requested by SQM HQ on 24/8/19 and has approved until end of license period. Total volume extension 130,132.6 mt CPO: 27,443.17 mt PK: 7,073.29 mt</p> <p>ii) New RSPO SCCS production monitoring was used. As of 30th September 2019, 85.75% of volume allocated has been used with the forecast until end of October 2019 (with volume extension) is still suffice.</p> <p>Corrective action taken is found to be effective, thus the major NC is closed on 2/10/19. Continuous implementation will be further verified in the next audit.</p> <p>ASA1_4 verification</p> <p>No reoccurrence of non-conformity. The evidences sighted found adequate and effectively implemented. Thus, the Major NC was effectively closed.</p>

Non-conformity			
NCR Ref #	1805554-201903-N1	Clause & Category (Critical / Minor)	4.7.3 – Non - Critical (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	23/7/2020
Statement of Nonconformity:	Safe working practices was not adequately demonstrated.		
Requirement Reference:	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.		
Objective Evidence:	<p>Observed at boiler station;</p> <p>Inadequate PPE and working tools used by 3 workers while installing the boiler front header cover.</p> <p>Manual lifting of steel plate was observed without proper working tools such as chain block as they are working on the boiler platform without body harness.</p>		
Corrective Actions:	Training for the said workers has been provided regarding the safe working procedure (working at height).		
Assessment Conclusion:	<p>Evidence verification</p> <ol style="list-style-type: none"> PPE was provided to all workers as per SOP established. Sighted during site visit at boiler station, steriliser station and loading ramp, the workers 		

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	<p>wear PPE as per SOP. PPE issuance were recorded in PPE log book. Sighted the records of PPE by workers recorded in the log book.</p> <p>2. Working at height training was conducted 6/8/2019</p> <p>The evidences sighted found adequate and effectively implemented. Thus, the minor NC was effectively closed.</p>
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Opportunity for Improvement	
OFI#	Description
OFI 1	N/A

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1359037M1	Major	2.1.1	29/7/2016	Closed out on 5/9/2016
1359037M2	Major	4.6.11	29/7/2016	Closed out on 5/9/2016
1359037M3	Major	6.5.2	29/7/2016	Closed out on 5/9/2016
1359037M4	Major	5.3.3	29/7/2016	Closed out on 5/9/2016
1359037M5	Major	SCC D2.2	29/7/2016	Closed out on 5/9/2016
1359037N1	Minor	2.1.2	29/7/2016	Closed out on 21/7/2017
1359037N2	Minor	4.6.10	29/7/2016	Closed out on 21/7/2017
1359037N3	Minor	4.7.6	29/7/2016	Closed out on 21/7/2017
1503698-201707-N1	Minor	6.5.3	21/7/2017	Closed out on 6/7/2018
1503698-201707-N2	Minor	6.9.3	21/7/2017	Closed out on 6/7/2018
1503698-201707-N3	Minor	5.1.2	21/7/2017	Closed out on 6/7/2018
1503698-201707-N4	Minor	4.7.3	21/7/2017	Closed out on 6/7/2018
1503698-201707-N5	Minor	4.7.5	21/7/2017	Closed out on 6/7/2018
1655429-201807-M1	Major	4.3.1	6/7/2018	Closed out on 26/8/2018
1655429-201807-N1	Minor	2.1.3	6/7/2018	Upgraded to Major NC
1655429-201807-N2	Minor	4.2.3	6/7/2018	Closed out on 03/08/2019
1655429-201807-N3	Minor	4.6.10	6/7/2018	Closed out on 03/08/2019
1805554-201903-M1	Major	4.4.2	3/8/2019	Closed on 2/10/2019
1805554-201903-M2	Major	2.1.3	3/8/2019	Closed on 2/10/2019
1805554-201903-M3	Major	RSPO SCCS D 4.2	3/8/2019	Closed on 2/10/2019
1805554-201903-N1	Minor	4.7.3	3/8/2019	Closed on 23/7/2020

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1930317-202007-N1	Minor	7.3.2	23/7/2020	Open. To be assess during next assessment
1930317-202007-N2	Minor	7.3.1	23/7/2020	Open. To be assess during next assessment

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 SOU 22 – Bukit Benut 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 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.

List of Stakeholders contacted	
<p>Internal Stakeholders Gender Committee Representatives Foreign & local workers</p>	<p>Union/Contractors NUPW Representatives Yasodai Enterprise Maju Enterprise Subramaniam a/l Singgarappan A.V.N Brothers Syarikat Sin Kim Huat</p>
<p>Government Departments SJK (T) Ladang Bukit Benut SJK (T) Ladang Lambak SK Kg. Melayu Niyor</p>	<p>NGO/Communities/Neighbourhood villages Secretary MPKK Kg. Melayu Niyor</p>

Stakeholders comment	
1	<p>Feedbacks: Schools’ Representatives – They informed that they have good relationship with the management. Assistance was provided by the management whenever requested. The teachers informed that no issue on child labour reported in SOU 22.</p> <p>Management Responses:</p>

	Management will continue to maintain good relationship with the stakeholders.
	Audit Team Findings: No further issue.
2	Feedbacks: Contractors – They informed that the payment was made promptly. They are aware of the complaint procedure and so far, they have no issue with the management.
	Management Responses: The management will ensure the payment will be made accordingly.
	Audit Team Findings: No further issue.
3	Feedbacks: Workers’ Representatives – The workers are satisfied with the management and they informed that their wages have achieved Minimum Wage Order 2020. There was top-up of wages during MCO period if the management did not offer work. They are aware of the complaint procedure. No discrimination from the management.
	Management Responses: The management will ensure comply to legal requirements and respect all the workers without discrimination.
	Audit Team Findings: No further issue.
4	Feedbacks: Gender Committee Representatives – No sexual harassment or violence case reported during the time of assessment. They are aware of the function of the committee and informed that no discrimination from the management regardless of gender.
	Management Responses: The management will continue to monitor if there is any case of sexual harassment or violence.
	Audit Team Findings: No further issue.
5	Feedbacks: Sundry Shop’s owner – They have good relationship with the management. They are aware of the complaint procedure. They have made complaint on some of the facility’s defects. The management has taken action to rectify part of the complaint.
	Management Responses: The management is in progress to rectify all the issues reported.
	Audit Team Findings: Issue to be followed-up during next audit

List of land owner / user contacted

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Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
N/A	N/A	N/A	N/A	N/A	N/A
Not applicable as Sime Darby acquired (freehold and leased) all the land directly from the state of Johor State government.					

Previous land owner / user comment	
	Feedbacks: N/A
	Management Responses: N/A
	Audit Team Findings: N/A


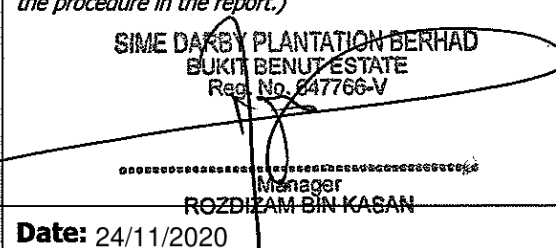
3.6 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team. All team members has maintained the impartiality and no conflict of interest.

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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 SOU 22 – Bukit Benut Palm Oil Mill and supply base has complied with the RSPO Principles & Criteria’s 2018 (MYNI 2019) for Sustainable Palm Oil 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 SOU 22 – Bukit Benut Palm Oil Mill and supply base is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: Muhammad Fadzli Masran	Name: Rosdizam bin Kasan
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Sime Darby Plantation Sdn Bhd
Title: Trainee Lead Auditor	Title: Manager (SOU 22 Chairman)
Signature: 	Signature: <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>  SIME DARBY PLANTATION BERHAD BUKIT BENUT ESTATE Reg. No. 847766-V Manager ROZDIZAM BIN KASAN
Date: 22/11/2020	Date: 24/11/2020

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance
Principle 1: Behave ethically and transparently		
Criterion 1.1: 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.		
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p> <p>Documents required for all unit of certification available in Bukit Benut SOU 22 Certification Unit:</p> <ul style="list-style-type: none"> - Land titles/user rights - Occupational health and safety plans - Plans and impact assessments relating to environmental and social impacts - HCV documentation - Pollution prevention and reduction plans - Details of complaints and grievances - Continuous improvement plans - Public summary of certification assessment report - Group Sustainability Policy - Record of contributions to community development <p>Sighted also a new Standard Operating Procedure has been established entitled: COVID-19 Preparedness and Emergency Response Plan; Document ID # SD/SDP/GSQM(OSH)/204-OD8; Rev. 0; Date: 9/3/2020 mainly to address the current pandemic situation within Sime Darby Plantation’s Strategic Operating Units (SOU) operational activities.</p>	Complied

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1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>SOU 22 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 SOU 22 Stakeholder Meeting conducted on 11/3/2020 at Bukit Benut Estate Meeting Room. Base on Attendance Record # 000478-000480, meeting was attended by all SOU 22 Managers, Senior Assistants, Assistants Managers, internal stakeholders and external stakeholders among local community representatives, government agencies, suppliers and contractors. Previous meeting was done on 4/4/2019. Internal stakeholder meeting was conducted at individual operating units respectively.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Records for of request and response available as per sample maintained by Bukit Benut Estate for COVID-19 SOP Compliance Weekly Report Information latest reported on 14/7/2020 to MITI. Other records of requests and responses maintained including workers' housing repair request form as per sample sighted as Lambak Estate for repair request form dated 10/6/2020 of house # 5A.</p> <p>Records also maintained by Bukit Benut Palm Oil Mill for communications and requests made by authority as per sample sighted for latest DOSH inspection visit dated 11/9/2019 and DOE inspection visit on 8/5/2019.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Procedures established as per Standard Operation Manual dated 01/11/2008 that documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). There's also Sustainable Plantation Management System (SPMS) Appendix 5 (Flowchart and Procedures on handling Social Issues) dated</p>	Complied

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		<p>01/11/2008 that documented the process of handling communication regarding social issues.</p> <p>Communication and explanation of procedures were made during consultation meeting with both internal and external stakeholders. SOU 22 Stakeholder Meeting conducted on 11/3/2020 at Bukit Benut Estate Meeting Room. Base on Attendance Record # 000478-000480, meeting was attended by all SOU 22 Managers, Senior Assistants, Assistants Managers, internal stakeholders and external stakeholders among local community representatives, government agencies, suppliers and contractors. Previous meeting was done on 4/4/2019. Internal stakeholder meeting was conducted at individual operating units respectively. CEP Niyor Estate conducted another external stakeholder meeting on 19/2/2020 involving school teachers, local police station in-charge, smallholders and local village representatives.</p> <p>Appointed person in-charge for communications on any issues related to RSPO/ISCC/MSPO are among managers and assistant managers of operating units within SOU 22 as per sample appointment letter dated 15/1/2020 of Senior Assistant, Nthiyarasan a/l Balalee for Lambak Estate and Mill Manager Haji Anuar Haji Zakaria for Bukit Benut Palm Oil Mill and Azlan Mustafa, Assistant Manager of CEP Niyor Estate.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The current stakeholders list updated as at January 2020. Few external stakeholders common among operating units were included mainly among authorities (DOSH, DOE, MPOB, JTK) stakeholder's details available included person in charge, address, e-mail and contact number as per sample as following:</p> <p>Bukit Benut Estate:</p>	Complied

Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.		
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad 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.</p> <p>For example, Bukit Benut Estate briefing and training of COBC were done on 19/2/2020 for executives and staffs, 6/2/2020 for AP, 5/2/2020 for existing workers, 11/3/2020 for supplier and contractors. New workers briefings were conducted on 13/1/2020, 24/1/2020 and 18/2/2020. Lambak Estate workers briefing of COBC was conducted on 12/2/2020 at its Lambak Community Hall. Bukit Benut Palm Oil Mill conducted its COBC & other policies training to all workers on few sessions between 22-28/1/2020.</p> <p>For labour agent and contractors, Sime Darby has applied its Vendor COBC that includes the Fair Business practices-ensuring that the company promote fair business practices and compete in an ethical manner, labour & human rights, ethics & management practices.</p> <p>The Vendor Integrity Pledge sighted available for sampled Bukit Benut Estate vendor LTT Transport Agency; Contract Date: 1/1/2020 for Contract School Bus Transport and Sivanathan Maju Enterprise; Contract Date: 1/1/2020 for Contract EFB Transport.</p> <p>Sighted also in Lambak Estate for replanting contractors as following:</p> <ul style="list-style-type: none"> - Replant Job Order: Land Preparation and Related Works for Oil Palm Replanting (1995C1) to 2020A (New field) between Sime Darby Plantation Berhad Lambak/Elaeis Estate and Leok Brothers Sdn. Bhd.; date: 10/2/2020 <p>Replant Job Order: Land Preparation and Related Works for Oil Palm Replanting (2001A1) to 2020B (New field) between Sime Darby</p>

Complied

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		Plantation Berhad Lambak/Elaeis Estate and Leok Brothers Sdn. Bhd.; date: 10/2/2020	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	<p>For labour agent and contractors, Sime Darby has applied its Vendor COBC that includes the Fair Business practices-ensuring that the company promote fair business practices and compete in an ethical manner, labour & human rights, ethics & management practices.</p> <p>The Vendor Integrity Pledge sighted available for sampled Bukit Benut Estate vendor LTT Transport Agency; Contract Date: 1/1/2020 for Contract School Bus Transport and Sivanathan Maju Enterprise; Contract Date: 1/1/2020 for Contract EFB Transport.</p> <p>Sighted also in Lambak Estate for replanting contractors as following:</p> <ul style="list-style-type: none"> - Replant Job Order: Land Preparation and Related Works for Oil Palm Replanting (1995C1) to 2020A (New field) between Sime Darby Plantation Berhad Lambak/Elaeis Estate and Leok Brothers Sdn. Bhd.; date: 10/2/2020 Replant Job Order: Land Preparation and Related Works for Oil Palm Replanting (2001A1) to 2020B (New field) between Sime Darby Plantation Berhad Lambak/Elaeis Estate and Leok Brothers Sdn. Bhd.; date: 10/2/2020 	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	SOU 22 continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by	Complied

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		the operating units and GSQM sustainability team. SOU 22 had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were	
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		<i>Bkt Benut Estate</i>	
		Permit/license	validity
	1	License Air receiver, JH PMT 22514	17/11/20
	2	MPOB license no: 522307-00-2000	31/7/2020
	3	Meterology Corporation C 182701	18/5/2021
	4	Permit storage diesel 9000, J 000977	20/7/2021
		<i>Lambak Estate</i>	
	1	License Air receiver, JH PMT 11573	02/1/2021
	2	License Air receiver, JH PMT 13852	02/1/2021
	3	MPOB license no: 518641-00-2000	28/2/2021
	4	KPDNKK J000936 -permit diesel 15000 L	28/6/2021
	5	Lesen Potongan Gaji - Eletrik JTK PU/9/129	06/7/2017
	6	BAKAJ - lesen mengabstrak air sungai ref 334	31/12/20
		<i>CEP Niyor Estate</i>	
	1	License Air compressor JH PMT 82460	16/5/21
	2	Permit to storage diesel 15000 L ref J 038210	11/8/20
	3	MPOB license no: 508445102000	31/3/21
	4	Lesen Potongan Gaji - JTK PP3/29/0144	01/12/98
		<i>Bukit Benut Palm Oil Mill</i>	
	1	MPOB license: 528154-00-4000	31/3/21

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2	Water tube boiler JH PMD 940	28/10/20
3	Steam receiver PMT 43561	28/10/20
4	Steriliser no 1 JH PMT 1959	28/10/20
5	Steriliser no 2 JH PMT 1960	31/12/20
6	Air Compressor JH PMT 2917	28/10/20
7	Air Compressor JH PMT 149190	28/10/20
8	Lesen Pemasangan Bekalan Elektrik 003573	30/5/21
9	DOE Jadual Pematuhan - ref 0747	30/7/21

Factory and Machinery Act 1967 –

The following competency requirements were verified:

	Competent person	No of personnel.
1	Steam engineer	1 st grade – 1
2	Engine Driver (BHC)	1 2 nd grade
3	Boilermen	3-1 st grade
4	AESP (Authorised Entrant and Standby Person for Confined Space)	3 competent persons
5	AGT (Authorised Gas Tester and Entry Supervisor for Confined Space)	2 competent persons
7	Electrical Chargemen ref 09393	One A4 Chargemen

EQ (Prescribed Premise) Crude Palm Oil Regulations 1977

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- a) Requirement in "*Jadual Pematuhan*"
- b) License no / validity period – 004747 valid 31/2/21 at 25mt/hr
- c) Discharge method – land application – water course
- d) Scheduled waste (CePSWaM): Ahmad Akhmal Anuar 28/4/20
- e) Effluent treatment system (CePPOMETS) Feb 2020 .currently being processed to attend refresher course. Email with HR sighted.

Air Monitoring

- a) Black smoke – The smoke density indicator alarm for boiler no.1 was functioning during site review at BBPOM.
- b) Particulate – Stack sampling was carried out on quarterly basis.
- c) Noted that monitoring was conducted on (at 12.0%) CO₂.

Boiler no	Date	Dust concentration	EQA std
JH PMD 940	20/2/20	59 mg/m ³	150 mg/m ³

Ambient Air Quality Monitoring

	Date	Total suspended particulate	MAAQ std
1	6/3/20	33 / 24 ug/m ³	260 ug/m ³

The stack sampling was carried out by *Envilab Sdn Bhd*. The mill has installed ESP commissioned in Jan 2020. Status of operation still in trial. FFB allowable max processed by the mill in 2019 under MPOB licence no 528154-00-4000 is 120000 mt. The total actual processed from Jan - Dec 2019 is 114696 mt concluding compliance to the licence requirement.

<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 laws and regulations.</p> <p>- Minor compliance -</p>	<p>The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them.</p> <p>a) Each estate and mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective managers. Recent update on July 2020.</p> <p>b) The GSQM Department is responsible to track changes and the information was disseminated to all its plantations and Mill department. Among the applicable legal and included in the legal register are</p> <ul style="list-style-type: none"> - Pesticides Act 1974 and Regulations, - Environmental Quality Act 1974 and Regulations, - Factories and Machinery Act 1967 and Regulations, - Occupational Safety and Health Act 1994, - Employment Act 1955, Aboriginal Peoples Act 1954, - Labour Act 1955 - Children & Young Person (Employment) Act 2010 - Industrial Relations Act 1967, - Children and Young Persons (Employment) Act 1966 - MPOB Regulations (Licensing) 2005. - Min retirement age Act 2012 	<p>Complied</p>
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		<ul style="list-style-type: none"> - Passport Act 1996 - Uniform Building By-Laws 1984 <p>c) The latest legal register update by GSQM is listed below;</p> <table border="1" data-bbox="1137 560 1877 823"> <thead> <tr> <th>No</th> <th>Rev date</th> <th>Title</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>17/12/19</td> <td>Arms Act 1960</td> <td>Newly added</td> </tr> <tr> <td>2</td> <td>17/12/19</td> <td>Aux Police Regulations 1970</td> <td>revision</td> </tr> <tr> <td>3</td> <td>18/05/20</td> <td>Perintah Kaw Pergerakan 2020</td> <td>Newly added</td> </tr> <tr> <td>4</td> <td>18/05/20</td> <td>Akta Pencegahan/Pengawalan Penyakit Berjangkit</td> <td>Newly added</td> </tr> </tbody> </table>	No	Rev date	Title	Remarks	1	17/12/19	Arms Act 1960	Newly added	2	17/12/19	Aux Police Regulations 1970	revision	3	18/05/20	Perintah Kaw Pergerakan 2020	Newly added	4	18/05/20	Akta Pencegahan/Pengawalan Penyakit Berjangkit	Newly added					
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2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 3 estates, during the field inspection confirmed that they were clearly marked and maintained. All the physical markers/boundary stones along the legal boundaries between was visibly available</p> <table border="1" data-bbox="1234 1118 1888 1396"> <thead> <tr> <th></th> <th>Estate</th> <th>Boundary</th> <th>Neighbouring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Lambak E</td> <td>PR2020A</td> <td>Ldg Sg Kluang</td> </tr> <tr> <td>2</td> <td>Lambak E</td> <td>P2016B</td> <td>IOI Unijaya Estate</td> </tr> <tr> <td>4</td> <td>Bkt Benut</td> <td>P2010C</td> <td>IOI - Unijaya Estate</td> </tr> <tr> <td>5</td> <td>Bkt Benut</td> <td>P2011B</td> <td>S/holder-Thai C Shing</td> </tr> <tr> <td>7</td> <td>CEP Niyor</td> <td>P2015C</td> <td>Chin Bee Plantations</td> </tr> </tbody> </table>		Estate	Boundary	Neighbouring	1	Lambak E	PR2020A	Ldg Sg Kluang	2	Lambak E	P2016B	IOI Unijaya Estate	4	Bkt Benut	P2010C	IOI - Unijaya Estate	5	Bkt Benut	P2011B	S/holder-Thai C Shing	7	CEP Niyor	P2015C	Chin Bee Plantations	Complied
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		8	CEP Niyor	P2014C	Smallholders	
Criterion 2.2: 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. - Minor compliance -	All OU in SOU 22 have listed and maintain all contracted parties and documented in List of Stakeholder as parts of their stakeholders includes internal such as employee and workers union and external stakeholders such as FFB suppliers, contractors, transporters and government department.				Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	<p>All OU in SOU 22 have listed and maintain all contracted parties and documented in List of Stakeholder as parts of their stakeholders includes internal 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"> - a (i); Vendor Code of Business Conduct (VCOBC) - a (ii); all applicable laws and regulations related anti-bribery, fraud and corruption. <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>Sighted memorandum acknowledgement by Teo Tuan Kwee Sdn. Bhd signed by company representative dated 21/7/2020.</p>				Complied
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.	The contract signed with contractors is sighted. For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC and Human Rights Charter				Complied

	- Minor compliance -	protecting the rights of children. Sighted the Vendor Integrity Pledge for Teo Tuan Kwee Sdn. Bhd.	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list.	Complied
2.3.2	<p>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.</p> <p>- Minor compliance -</p>	The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list.	Complied
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 22 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.</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</p> <p>In the 5 years business plan include items as follows:</p>	Complied

		<ul style="list-style-type: none"> a. Palm oil mill <ul style="list-style-type: none"> i. Mill intake – FFB input ii. Production of CPO iii. Production of PK iv. Total Palm Oil Extraction v. Total Palm Kernel Extraction vi. Mill cost b. Oil Palm Estate <ul style="list-style-type: none"> i. Total crop projection and yield potential ii. Activity direct cost <ul style="list-style-type: none"> a. Mature upkeep b. Manuring c. Harvesting and collection d. Transportation e. Nursery iii. Estate administration <ul style="list-style-type: none"> a. Admin Cost iv. Labour overhead v. Road and bridges vi. Cost of production. 	
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		The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2024) and well documented upon request.																									
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	<p>SOU 22 have long range replanting program until FY 2025. Replanting planned for the palm older than 25 years, non-performance field (yield) and Ganoderma infected palm. Observed the replanting program for the next financial year 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>Bukit Benut</td> <td>0.00</td> <td>69.94</td> <td>43.50</td> <td>144.69</td> <td>0.00</td> </tr> <tr> <td>Lambak</td> <td>147.31</td> <td>31.80</td> <td>174.09</td> <td>69.57</td> <td>61.73</td> </tr> <tr> <td>CEP Niyor</td> <td>57.10</td> <td>62.39</td> <td>72.84</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table>	Estate	2021	2022	2023	2024	2025	Bukit Benut	0.00	69.94	43.50	144.69	0.00	Lambak	147.31	31.80	174.09	69.57	61.73	CEP Niyor	57.10	62.39	72.84	0.00	0.00	Complied
Estate	2021	2022	2023	2024	2025																						
Bukit Benut	0.00	69.94	43.50	144.69	0.00																						
Lambak	147.31	31.80	174.09	69.57	61.73																						
CEP Niyor	57.10	62.39	72.84	0.00	0.00																						
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	<p>Sime Darby Plantation Berhad has develop Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019, Section 20.0 where management review will be reviewed annually. The management review mainly discusses the internal audit findings and the performance of the operating units since the last review. The management review meeting minutes was sighted as follows;</p> <table border="1"> <thead> <tr> <th>Operating Unit</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Operating Unit	Date			Complied																				
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		Bukit Benut POM	11/6/2020	
		Bukit Benut Estate	11/6/2020	
		Lambak Estate	10/7/2020	
		CEP Niyor Estate	13/6/2020	

Criterion 3.2: 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.

3.2.1	<p>(C) 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> <p>- Critical (Major) compliance -</p>	<p>The estates and the mill had stated their intentions towards continuous improvement through the following action. The plans were similar and monitored through the regional compilation.</p> <table border="1" data-bbox="1176 885 1892 1361"> <thead> <tr> <th colspan="3"><i>Estates</i></th> </tr> <tr> <th></th> <th>Description/Issue</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Field supervision IT enhancement</td> <td>SDDS - digital supervision SEMUA 2.0 -FFB movement</td> </tr> <tr> <td>2</td> <td>ESH campaign</td> <td>SIME Card practices</td> </tr> <tr> <td>3</td> <td>To reduce circle spraying cost/ha for mature fields</td> <td>Convert to inter 16 pump spraying area to CDA spraying</td> </tr> <tr> <td>4</td> <td>To reduce path grass cutting cost for mature fields</td> <td>Appoint contractor to carry out work based on ha basis</td> </tr> <tr> <td>5</td> <td>To reduce compound upkeep cost</td> <td>Carry out gotong royong on monthly basis.</td> </tr> <tr> <td>6</td> <td>Enhancement of beneficial plant</td> <td>To develop beneficial plant nursery - Turnera subulata, Cassia cobanensis,</td> </tr> </tbody> </table>	<i>Estates</i>				Description/Issue	Action Plan	1	Field supervision IT enhancement	SDDS - digital supervision SEMUA 2.0 -FFB movement	2	ESH campaign	SIME Card practices	3	To reduce circle spraying cost/ha for mature fields	Convert to inter 16 pump spraying area to CDA spraying	4	To reduce path grass cutting cost for mature fields	Appoint contractor to carry out work based on ha basis	5	To reduce compound upkeep cost	Carry out gotong royong on monthly basis.	6	Enhancement of beneficial plant	To develop beneficial plant nursery - Turnera subulata, Cassia cobanensis,	Complied
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			for the IPM management	Antigonon leptopus, Euphorbia heterophylla,
		7	Enhancement of HCV /biodiversity management	An education and awareness programme to train the SOU biodiversity, flora/fauna and about 8biodiversity management.
		8	Mechanization expansion	FM3 machine for manual application
		9	Enhancement of facilities	Construction of new parking bay using used material
		10	Improvement in chemical selection	Immature field weeding conversion from basta to tarang
		11	Mechanization in LF collection	Introduction of circle blower.
		12	Enhancement of living quarters facilities.	Sport activities to promote recreation activities for good health life. Estate management will provide sport facilities/tools.
			Bkt Benut Mill	
			Description/Issue	Action Plan
		1	Waste reduction	Install kernel oil trap at kernel bunker Install strainer at FFB conveyor
		2	Mill Operation	Reduce speed for thresher drum
				Press - Change press cages diameter hole 4mm to 5mm
				WTP Increase position of water chemical to higher place for better chemical pumping
				Implement total productive maintenance and 5 S activity.
				Store SW at specific area at the mill.

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		<table border="1"> <tr> <td></td> <td></td> <td>Reduce TNB usage via increase fibre/shell consumption.</td> </tr> <tr> <td>3</td> <td>ESH campaign</td> <td>SIME Card practices</td> </tr> </table>			Reduce TNB usage via increase fibre/shell consumption.	3	ESH campaign	SIME Card practices	
		Reduce TNB usage via increase fibre/shell consumption.							
3	ESH campaign	SIME Card practices							
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: 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>- Minor Compliance -</p>	The RSPO metrics template has not been issued by RSPO for reporting.	Not Applicable						
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.									
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The mill processing system is documented in the Sustainability Plantation Management System MQMS/SQM/08 v 1 dated 01/11/2008 which includes;</p> <p>a) The mill SOP,</p> <p>b) The Mill Quality Management Manual v.1 2008/MQMS/QMM/08.</p> <p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from;</p> <p>a) the reception, sterilization, threshing, pressing,</p>	Complied						

		<ul style="list-style-type: none"> b) clarification, depericarping (nut polishing) station, c) effluent, laboratory, workshop, dispatches etc. <p>In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p> <p>The standard operation procedure for the estates / mill operations is available which is prepared on Group basis. There are levels of the documentation identified as follows;</p> <ul style="list-style-type: none"> a) Level 1 Estate quality management system standard operation manual b) Level 2 EQMS quality management manual c) Level 3 standard operating procedure d) Level 4 work instruction e) Level 5 records. <p>Amendments are made should there be requirement to suit the local issues/situation. There were also updated procedure under SOP for water analysis and RSPO SCCS procedure:</p> <ul style="list-style-type: none"> a) SPMS, Appendix 7: SOP for water quality monitoring, issue 2, dated 01/06/2016. b) SOP for sampling guideline; Water and Waste water Sampling Guideline, issue 1, dated 01/06/2016. c) RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version 2, issue 2, dated October 2016. 	
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<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>The Plantation Advisory Department, Performance Monitoring Unit, Quality Management Unit (GSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Other mechanism as described below.</p> <table border="1" data-bbox="1169 568 1912 1391"> <thead> <tr> <th colspan="2">Estates</th> <th></th> </tr> <tr> <th colspan="2">Areas</th> <th>Action/Activities</th> </tr> </thead> <tbody> <tr> <td rowspan="3">1</td> <td rowspan="3">Daily</td> <td>Supervision by field staff/Assist/Manager</td> </tr> <tr> <td>Report of daily activities/costings/variation</td> </tr> <tr> <td>SDDS - digital supervision</td> </tr> <tr> <td rowspan="7">2</td> <td rowspan="7">Schedule</td> <td>Quarterly ESH meeting</td> </tr> <tr> <td>PMU visits on field activities</td> </tr> <tr> <td>Internal audits by GCAD / RSQM</td> </tr> <tr> <td>CEP Niyor Estate -An internal audit was conducted by SQM Malaysia, Central East RSQM on 12th November 2019 to check on compliance to the standard operating procedures and legal aspects.</td> </tr> <tr> <td>External audit RSPO /MSPO</td> </tr> <tr> <td>PA visits / Agronomist visits</td> </tr> <tr> <td>Lambak Estate - PA visit was made on 14-16 Jan 2020. Highlights among others on Yield improvement, crop evacuation status crop quality and assessment costing variation</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Medical /health</td> <td>Monthly check by HA/MA</td> </tr> <tr> <td>Annual medical surveillance.</td> </tr> <tr> <td colspan="3">Bkt Benut POM</td> </tr> <tr> <th colspan="2">Areas</th> <th>Action/Activities</th> </tr> <tr> <td rowspan="2">1</td> <td rowspan="2">Daily</td> <td>Supervision by field staff/Assist/Manager</td> </tr> <tr> <td>Report of daily activities/costings/variation</td> </tr> </tbody> </table>	Estates			Areas		Action/Activities	1	Daily	Supervision by field staff/Assist/Manager	Report of daily activities/costings/variation	SDDS - digital supervision	2	Schedule	Quarterly ESH meeting	PMU visits on field activities	Internal audits by GCAD / RSQM	CEP Niyor Estate -An internal audit was conducted by SQM Malaysia, Central East RSQM on 12 th November 2019 to check on compliance to the standard operating procedures and legal aspects.	External audit RSPO /MSPO	PA visits / Agronomist visits	Lambak Estate - PA visit was made on 14-16 Jan 2020. Highlights among others on Yield improvement, crop evacuation status crop quality and assessment costing variation	3	Medical /health	Monthly check by HA/MA	Annual medical surveillance.	Bkt Benut POM			Areas		Action/Activities	1	Daily	Supervision by field staff/Assist/Manager	Report of daily activities/costings/variation	<p>Complied</p>
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			2	Schedule	Quarterly ESH meeting Internal audits by GCAD / RSQM External audit RSPO /MSPO Mill Advisor visit was conducted twice a year. Latest visit was conducted on 24-25 th Jun 2019 and 13-14 Nov 2019. The Visit was conducted by Mill Advisor Mr Edwin Ng Weng Keong. The report covers on the OER, KER, oil and kernel losses, mill throughput, FFB processed, plant and machinery upkeep, CPO and kernel quality, cost of production and compliance to legal and regulation.	
			3	Annual	Medical surveillance	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Operating units visited maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. The mill Advisor and Plantation Advisor (PA) are accountable to monitor the estates compliance towards the SOP, Budget and Productivity.				Complied
Criterion 3.4: 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.						
3.4.1	(C) 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/out-grower scheme, is documented. - Critical (Major) compliance -	Latest SOU 22 Bukit Benut assessment was conducted on 16-19 May 2016 by personnel from Sime Darby Plantation Sustainability Strategy Unit of PSQM Department as per records of Social Impact Assessment (SIA) Report. Recommendation made by Accessor for Management Plan has been reviewed by management during internal and external stakeholders' consultation meeting for updates on the actual management plan established. Social Impact Assessment for management action.				Complied

Environmental

There were 2 sites intended for the new planting in SOU 22. Details as follows;

	Field	Previous area	Year of conversion
1	P95C1	Fallow area	Jan 2021 replant
2	P01A1	Fallow area	June 2020 reopen
	Total	144.84 ha	

The fallow area of 144.84 ha consists of mixed land use types including oil cultivation.

- a) The areas assessed were previously planted with OP and abandoned due to Company policy to set aside area's above 23 degree.
- b) Following the latest IFSAR mapping to precisely identify the topography, it was learn that the large portion of land does not fall in the category of > 25 degree.
- c) The management has decided to reopen these area for harvesting as well as replanting. An SEIA was performed to assess the social and environment impact prior to the project by the Group Sustainability & Quality Management Dept SDP. An internal assessment using selected components of SEIA and HCV assessments since the total of land area is < 500 ha. The assessment of both the above was made among others meant;

		<ul style="list-style-type: none"> - To assess current condition based on identified potential aspects - To verify presence of protected & conservation areas that could be significantly affected. - To assess the social & environmental impact on the affected areas/stakeholders arising from the proposed new planting activities. - To comply with various sustainability certification schemes <p>d) The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas.</p> <p>e) The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control.</p> <p>f) Interviews were conducted with stakeholders to obtain feedback on the impact of replanting activities on their daily lives.</p> <p>The report produced among includes the following;</p> <ul style="list-style-type: none"> a) Organization information b) Scope of assessment & team c) Methodology assessment timeline, approach and parameters 	
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		<p>d) SEAI matrix and findings.</p> <p>The assessor concluded the following;</p> <ul style="list-style-type: none"> a) The project site is suitable for replant and reopen for operation b) There are no adverse social and environmental impacts from proposed development c) The finding of SEIA be further incorporated with the existing environmental and social management and monitoring plan. d) The effectiveness be evaluated monitored through regular management review. e) There are no HCV areas, other conversation set-aside, disturbed forest, tree/food crop identified for the new <p>The assessment confirmed that there were no HCV area situated within the affected area as per assessment for SOU 22. The SEIA was conducted in accordance to requirement of RSPO new planting procedure NPP 2015 taking effect in Jan 2016. the team concluded that the project site is suitable for development of oil palm with no adverse social and environmental impacts resulting from the proposed development.</p> <p>The assessors confirmed that there were no HCV areas situated within the affected areas. The SEIA was conducted in accordance to requirements of the RSPO NPP 2015 came into effect in Jan</p>	
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		<p>2016. The assessor concludes that the project site is suitable for development of oil palm as there is no adverse social and environmental impacts resulting from the proposed development.</p> <p>All sites and the reports were visited and sighted respectively by the auditors in presence of the PSQM, estate personnel.</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>- Minor Compliance -</p>	<p>Social</p> <p>As per SEIA report, the social action plans:</p> <ul style="list-style-type: none"> - To conduct a meeting with workers and explain to them on estate’s plan to reclaim the area for oil palm planting. - To produce a planting/replanting memo to workers so that they have enough time to harvest the cash crops and relocate their livestock to a proper place. - To provide an alternative site/green book area for workers to plant cash crops. <p>Environmental</p> <p>The Social Management Plan for period 2020-2021 available for SOU 22 Certification Unit. It mention the objectives, category, action, frequency, person in charge and monitoring period.</p> <p>Example seen as below:</p> <p>a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders,</p>	<p>Non-compliance</p>

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		<p>b) Monitoring of pay and agreement of workers and contractor’s workers and to maintain housing and facilities provided to workers).</p> <p>c) To contribute to local communities development</p> <p>CEP Niyor Estate - During the site visit to the workshop it was sighted that the Pollution Controlled Device (Oil Trap) was not able trap the oil from the parts washing area as per Waste Management Plan 2020 action plan in Workshop. The monitoring of the Pollution Controlled Device effectiveness and Waste Management Plan 2020 was not effectively implemented. Hence an NCR is raised.</p>													
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>Bukit Benut Estate has reviewed and updated its Social Management Action Plan for FY 2020 on 31/12/2019 which includes the plan to address sample issues raised by internal stakeholders as following:</p> <table border="1" data-bbox="1153 949 1926 1398"> <thead> <tr> <th>Issues</th> <th>Action plan</th> <th>Completion date</th> </tr> </thead> <tbody> <tr> <td>Potholes on road within workers’ line site</td> <td>Include in budget FY 2020 for road repairs at housing areas</td> <td>December 2020</td> </tr> <tr> <td>Broken drains within line sites</td> <td>Include in budget FY 2020 for drainage repairs</td> <td>October 2020</td> </tr> <tr> <td>Disturbance caused by stray dogs roamed</td> <td>Report to local authority</td> <td>February 2020</td> </tr> </tbody> </table>	Issues	Action plan	Completion date	Potholes on road within workers’ line site	Include in budget FY 2020 for road repairs at housing areas	December 2020	Broken drains within line sites	Include in budget FY 2020 for drainage repairs	October 2020	Disturbance caused by stray dogs roamed	Report to local authority	February 2020	OFI
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		<p>within line site and other building compounds</p>												
<p>Lambak Estate Management Plan on Social Impact Assessment was last reviewed on 24/7/2019 on sample issues/areas of concerns as following:</p>														
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Issues	Action plan	Completion date												
FFB lorry driver driving too fast in main road	Conduct meeting with FFB transporter	July 2019												
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<p>Bukit Benut Palm Oil Mill updated its Management Plan on Social Impact Assessment for FY 2020 for sample areas of concerns as following:</p>														
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		housing complaints			
		Stray dog within housing area	To liaise with Veterinary Department	July 2020	
		Potential mosquito spread disease	Fogging within housing area	Periodical	
		CEP Niyor Estate updated its Management Plan on Social Impact Assessment on 27/6/2020 for sample areas of concerns as following:			
		Issues	Action plan	Completion date	
		Estate employees' vehicle condition found with incomplete brake, head light, road tax & driving license	Inspection of all vehicles and owners within estate	March 2020	
		Transportation of workers to town	Public transport available since estate located near main road	February 2020	

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		<p>Fallen tree blocking main road</p>	<p>To remove fallen tree immediately</p>	<p>March 2020</p>	<p>However, potential social aspects/issues related to housing/living conditions based on results of implementation of workers' housing (line site) weekly inspection could be alternative inputs to Social Impact Assessment to be managed better in absence of any grievance and/or complaints from workers themselves. Hence, an OFI has been raised on the matter.</p> <p>Environmental</p> <p>The Social/Environmental Action Plan available for each units were available having information i.e issues, management plan, PIC and time frame. The input are gathered from the meeting minutes</p> <ul style="list-style-type: none"> a) Gender Committee, NUPW, b) Safety Meeting, c) Complaint & Request from internal & external stakeholders and muster briefing). d) The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas. e) The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program,
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		<p>protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control.</p> <p>f) Interviews were conducted with stakeholders to obtain feedback on the impact of replanting activities on their daily lives.</p>	
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Sime Darby Plantation Berhad has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019, where the management is committed to contributing to a better society includes respecting, upholding & no-exploitation of fundamental human rights, providing safe and healthy workplaces and protecting workers' welfare and engaging and empowering communities.</p> <p>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.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>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.</p>	Complied

		Implementation records sighted for sample as per indicators in criterion 6.2 below.	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby has established the Group Policy on Health and Safety signed by the Managing Director on Jan 2015. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate.</p> <p>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.</p> <p>SOU 22 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 in such as follows:</p> <p>Estates: Harvesting, weeding, manuring, office operation, security, pest and disease and other support operation.</p> <p>Mill: security, office, store, weighbridge, fruit handling, threshing and etc.</p> <p>The assessment also covers working type, job step, hazard, effect, existing control, type, probability, etc.</p> <p>The HIRARC was reviewed at minimum once a year, if accident occur or changes on the operation.</p>	Complied

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		<p>Bukit Benut POM HIRARC review was conducted during Management Review Meeting. Latest HIRARC review was conducted on 16/5/2020 with additional HIRARC on Covid-19 monitoring.</p> <p>Bukit Benut Estate The OSH committee discusses any issues regarding the HIRARC during OSH committee meetings. Latest review was conducted 4/6/2020 due to an accident that happened on 5/5/2020.</p> <p>Lambak Estate Latest HIRARC was conducted on 15/5/2020 for accident occur on 4/5/2020 in harvesting operation and on 18/5/2020 with additional HIRARC on Covid-19 monitoring.</p> <p>CEP Niyor Estate The estate has conducted HIRARC review on annually basis and during accident occur. Latest review was conducted on 4/5/2020 with additional HIRARC on Covid-19 monitoring.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</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: Bukit Benut POM</p>	Complied

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		<p>i. Chemical Hazard Risk Assessment has conducted on 2/2/2019 as per report ref. no. JKPP HIE 127/171-2(166) – 2019/002 by certified assessor with reg. no. JKPP HIE 127/171-2(166).</p> <p>ii. Latest audiometric test were conducted on 23/9/2019 as per report ref. no. PRO/SEPT/19(KKSBB/79) JKPP H/E 127/12/4-65/17. 79 workers were sent for test and 29 were found with abnormal results and sent for further test with OHD.</p> <p>Bukit Benut Estate</p> <p>i. Latest medical surveillance for chemical handlers was conducted in June 2020 by certified OHD with Reg. no. HQ/08/DOC/00/597. 28 workers were send for surveillance and found fit to work as chemical handlers.</p> <p>ii. Monthly medical check-up for chemical handlers were conducted monthly by the estate medical assistant. Sighted the records of medical check-up conducted in the month of April, May and June 2020 conducted during VMO visit at the estate.</p> <p>Lambak Estate</p> <p>i. Latest medical surveillance for chemical handlers was conducted on 8/10/2020 by certified OHD with Reg. no. HQ/08/DOC/00/597. 28 workers were send for surveillance and found fit to work as chemical handlers.</p> <p>ii. The Medical Assistant conducted the medical screening for all sprayers on monthly basis. Sighted the medical screening records for the month of March, April, May and June 2020 conducted by the Medical Assistant and reviewed by the Visiting Medical Officer.</p>	
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		<p>iii. The workplace inspection was conducted on quarterly basis prior to Safety and Health Committee Meeting. Sighted the records of workplace inspection dated 28/4/2020.</p> <p>CEP Niyor Estate</p> <p>i. First aid was available at few workstation and provided to every mandore in the estate. Total of 15 first aid box were available in the estate. Sighted during site visit, the mandore carry the first aid kit during working in the field. First aid monitoring was conducted on quarterly basis. Sighted the first aid kit monitoring records for the month of December 2019, March and June 2020.</p>	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The mill and estate visited has established training plan base on training need analysis conducted and documented in Training Plan. The training plan covers all job designation including the contractors.</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>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The mill and estates 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>	Complied

		<p>Bukit Benut POM</p> <ul style="list-style-type: none"> i. Hearing conservation training dated 12/2/2020 ii. Working at height training dated 6/8/2019 <p>Bukit Benut Estate</p> <ul style="list-style-type: none"> i. Policy on the protection of Human Rights and Whistleblowing training dated 4/7/2020 ii. Chemical premixing training dated 23/6/2020 iii. Preparedness and Response guidelines of COVID 19 training dated 12/4/2020 iv. Cantas and pruning training dated 19/6/2020 v. First aid, CPR and choking training dated 20/6/2020 vi. Zenoah blower begpack air blower training dated 19/6/2020 vii. Inter-16 pump, CDA and PPE training dated 5/6/2020 viii. Harvester competency training dated 11/3/2020 ix. Induction course for new training workers dated 18/2/2020 x. Rat baiting using motorbike training dated 1/2/2020 <p>Lambak Estate</p> <ul style="list-style-type: none"> i. Manuring training dated 14/7/2020 ii. Circle spraying training dated 11/7/2020 iii. Human defender and whistleblowing policy training dated 10/7/2020 	
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		<ul style="list-style-type: none"> iv. Chemical mixing and disposal chemical container training dated 25/6/2020 v. RSPO and MSPO briefing for contractors in SOU 22 dated 3/7/2020 vi. Spraying training dated 6/5/2020 vii. Rat baiting training dated 4/2/2020 viii. Inter-16 pump maintenance and spraying training dated 15/4/2020 ix. Replanting safety briefing dated 5/2/2020 x. First Aid training dated 20/2/2020 CEP Niyor i. Management HCV area and reclassification training dated 26/7/2019 ii. New policy, COBC, HCV and Human Rights Defender briefing dated 8/7/2020 iii. Spraying techniques and safety aspects and maintenance of Inter sprayer dated 4/2/2020 iv. First aid training dated 27/6/2020 v. Rat baiting training dated 12/6/2020 vi. Trunk injection training dated 1/7/2020 vii. Fire drill training dated 12/6/2020 	
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		viii. Safe driving technique for tractor driver training dated 2/7/2020 ix. Spraying and safety briefing training dated 4/2/2020	
3.7.3	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. - Minor Compliance -	Sighted the sample training records as follows: Bukit Benut POM i. RSPO/MSP0 Supply Chain Certification System training dated 4/6/2020	Complied
Criterion 3.8: Supply chain requirement for mills (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)			
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	As per SOP established and 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 Glossary section define the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user uniquely identifiable ta a single RSPO certified supply base. The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list.	Complied
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Complied

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	and 3rd 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.		
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.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim). Seen the Member ID: RSPO_PO1000000109, and license valid until 4/10/2020. Sampled the transaction ID as below: CSPO <ul style="list-style-type: none"> i. TR-524ad084-96a8 dated 7/1/2020 at 327.29 MT ii. TR-8c2df4d9-b118 dated 16/4/2020 at 310.00MT CSPK TR-bb5bd409-ccb8 dated 19/3/2020 at 200.00 MT	Complied
3.8.5	Documented procedures 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:	Procedure for supply chain has been established and 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	Complied

	<ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 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. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>2018, issue no. 5 dated April 2019. Among the subjects covered in the procedure are:</p> <ul style="list-style-type: none"> i. Introduction ii. Objectives iii. Scope iv. Responsibilities v. Control of documents and records vi. Delivery of FFB from estate vii. Receiving FFB at the mill viii. Process monitoring ix. Products dispatch x. Non-conforming products and/or documents xi. Products claims xii. Outsourced contractors xiii. Training xiv. Reclassification of mill’s supply chain model xv. Production volume xvi. Conversion factors xvii. Internal audit xviii. Complaints xix. Management review 	
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		The Mill Manager holds the hold the responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements as stated 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 4.0 Responsibilities.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) 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>Addressed 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 18.0 Internal Audit. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP.</p> <p>Combined internal audit for supply chain was last conducted on 12/6/2020 by 4 internal auditors from Group Sustainability and Quality Management Department. 3 non-conformity for RSPO SCCS was raised during the internal audit. All non-conformity raised during the audit were closed on 17/7/2020. Sighted the CAP and evidence of non-conformity raised.</p> <p>The results of Internal Audit were discussed in the Management Review Meeting as sighted in minutes meeting conducted on 18/7/2020.</p>	Complied
3.8.7	<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>	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.	Complied

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	<p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</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>Bukit Benut mill have 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. Lambak Estate Date: 18/7/2020 C/N no.: 27904 RSPO Cert. no.: RSPO 591229 W. Ticket no.: 97840 Net Weight: 11850 kg</p> <p>ii. Cenas Estate Date: 18/7/2020 C/N no.: 26286 RSPO Cert. no.: CU-RSPO-863077 W. Ticket no.: 97848 Net Weight: 12520 kg</p>	
3.8.8	Sales and Goods Out	Sampled of the sales and goods out delivery records as below:	Complied

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<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"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>CSPO</p> <ul style="list-style-type: none"> a. The name and address of the buyer: Sime Darby Jomalina b. The name and address of the seller: Bukit Benut POM c. The loading or shipment / delivery date: 21/7/2020 d. The date on which the documents were issued: 21/7/2020 e. RSPO certificate number: RSPO 591229 f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): RSPO CPO-IP g. The quantity of the products delivered: 39230 kg, 39660 kg, 36980 kg, 39870 kg h. Any related transport documentation: Weighbridge Ticket no. 008998, 008999, 009000, 009001 i. A unique identification number: Contract Ref.: S/C-PSD/2007/CPO0824 <p>CSPK</p> <ul style="list-style-type: none"> a. The name and address of the buyer: Hok Huat Oil Mill Sdn. Bhd b. The name and address of the seller: Bukit Benut POM c. The loading or shipment / delivery date: 1/7/2020 d. The date on which the documents were issued: 1/7/2020 e. RSPO certificate number: Sold non-certified f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or 	
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		<p>the approved abbreviations): Sold non-certified</p> <p>g. The quantity of the products delivered: 15680 kg, 39760 kg, 15540 kg</p> <p>h. Any related transport documentation: Weighbridge Ticket no. 008954, 008955, 008960</p> <p>i. A unique identification number: Contract Ref.: s/PSD/2005/PK0296</p>	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he 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</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>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.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) 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</p>	<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 outsourced processing activities like refining or crushing.</p> <p>The list of outsourced contractor was sighted, "list of stakeholder" 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>	Complied

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	operations, systems, and all information, when this is announced in advance.		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<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 Bukit Benut Palm Oil Mill.</p>	Complied
3.8.11	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>The mill has issued Memorandum to all contractors dated 21/7/2020. In the memorandum stated the contractors have to comply as follows;</p> <ul style="list-style-type: none"> i. Comply with local legal requirements ii. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company iii. Having signed and enforceable agreement with the company iv. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary v. Having related working permits vi. Ensure PPE utilization by contractors' employee while being in the company premise. <p>Sighted memorandum acknowledgement by Teo Tuan Kwee Sdn. Bhd signed by company representative dated 21/7/2020.</p>	Complied

<p>3.8.12</p>	<p>Record keeping</p> <ul style="list-style-type: none"> 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. 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. 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. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> 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. 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. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<ul style="list-style-type: none"> i) Sime Darby has established Standard Operating Procedure to maintain all records of evidence on the implementation of RSPO 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. 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. iii) Bukit Benut POM receives and process only certified FFB. Therefore, it uses the Identity Preserve supply chain system and module. iv) a. Bukit Benut POM 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"> 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 Daily/Monthly Production Summary report Jan 2019 – Jun 2020 and FFB summary Jan 2019 – Jun 2020. 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 Bukit Benut POM as per Mass Balance records as at June 2020. 	<p>Complied</p>
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3.8.13	<p>Extraction Rate</p> <p>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>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 Daily/Monthly Production Summary report Jan 2019 – Jun 2020 and FFB summary Jan 2019 – Jun 2020.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.</p>	Complied
3.8.15	<p>Processing</p> <p>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>Bukit Benut POM received only certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>	Complied
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>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

	ii) 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.		
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>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	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.	No off-product claim made by Bukit Benut POM 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	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <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>	Not applicable as no off-product claim made by Bukit Benut POM as to date.	Not Applicable
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 Bukit Benut POM 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 Bukit Benut POM as to date.	Not Applicable

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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 Bukit Benut POM as verified through documentations and websites.	Complied
Business to business communications			
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
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 MB) and RSPO certificate number; RSPO 591229.	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>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	BBPOM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm	No business to consumer communication on product specific claim made Bukit Benut POM and only producing crude and unfinished product. This is not applicable for Bukit Benut POM.	Not Applicable

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	products contained within product(s), which are known as '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 Bukit Benut POM and only producing crude and unfinished product. This is not applicable for Bukit Benut 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 Bukit Benut POM and only producing crude and unfinished product. This is not applicable for Bukit Benut 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 Bukit Benut POM and only producing crude and unfinished product. This is not applicable for Bukit Benut 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 Bukit Benut POM and only producing crude and unfinished product. This is not applicable for Bukit Benut 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 Bukit Benut POM and only producing crude and unfinished product. This is not applicable for Bukit Benut 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 Bukit Benut POM and only producing crude and unfinished product. This is not applicable for Bukit Benut POM.	Not Applicable

6.8	<p>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 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 www.rspo.org.</p>	<p>No business to consumer communication on product specific claim made Bukit Benut POM and only producing crude and unfinished product. This is not applicable for Bukit Benut POM.</p>	Not Applicable
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES (delete if not applicable)			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Bukit Benut POM is producing crude palm product and does not involved in any labelling of end product.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Bukit Benut POM is producing crude palm product and does not involved in any labelling of end product.	Complied
	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 covered by the purchase of RSPO Credits of equivalent volume.	Bukit Benut POM is producing crude palm product and does not involved in any labelling of end product.	Complied

Labelling and trademark (IP)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • 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. 	<p>Bukit Benut POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</p>
Messaging (IP)			
	<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"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>Bukit Benut POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</p>

Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) 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, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Regional Sustainability & Quality Mangement (RSQM) team has conducted briefing on Protection of Human Right Defender Policy, Whistleblowing Response Procedure and Company Policies & Charter to all Managers, Senior Assistants, Assistant Managers and Chief Clerks of SOU 22 operating units as per Attendance Record # 00051. Training also done for contractors as per Attendance Record # 00052 on 3/7/2020 as well.</p> <p>Mill conducted additional briefing on 18/7/2020 for its workers. COVID-19 training and info on 28/4/2020.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has implemented Group Sustainability and Quality Policy Statement dated 02 Dec 2019 where the management is committed to contributing to a better society:</p> <ul style="list-style-type: none"> - Respecting, upholding & no-exploitation of fundamental human rights. - Providing safe and healthy workplaces and protecting workers' welfare. - Engaging and empowering communities. <p>This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) 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 whistle-</p>	<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>	Complied

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	<p>blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</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>													
<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Implementation procedures includes briefing, trainings and consultation meetings with various level of stakeholders. The on-site verification through consultation among internal and external stakeholders confirmed that system is understood.</p>	<p>Complied</p>												
<p>4.2.3</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>The on-site verification through consultation among internal and external stakeholders and documented records reviewed shown that SOU 22 keeps parties to a grievance informed of progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders in addressing issues raised by stakeholders as per sample as following:</p> <table border="1" data-bbox="1137 963 1912 1374"> <thead> <tr> <th>Issues</th> <th>Action plan</th> <th>Completion date</th> </tr> </thead> <tbody> <tr> <td>Potholes on road within workers' line site</td> <td>Include in budget FY 2020 for road repairs at housing areas</td> <td>December 2020</td> </tr> <tr> <td>Broken drains within line sites</td> <td>Include in budget FY 2020 for drainage repairs</td> <td>October 2020</td> </tr> <tr> <td>Disturbance caused by stray dogs</td> <td>Report to local authority</td> <td>February 2020</td> </tr> </tbody> </table>	Issues	Action plan	Completion date	Potholes on road within workers' line site	Include in budget FY 2020 for road repairs at housing areas	December 2020	Broken drains within line sites	Include in budget FY 2020 for drainage repairs	October 2020	Disturbance caused by stray dogs	Report to local authority	February 2020	<p>Complied</p>
Issues	Action plan	Completion date													
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		roamed within line site and other building compounds			
		FFB lorry driver driving too fast in main road	Conduct meeting with FFB transporter	July 2019	
		Street lights along road to Kampung Mengkibol	Communicate with HQ Level (Land Department)	September 2019	
		Expedite attending workers' housing complaints	Increase budgeting allocation	January 2020	
		Stray dog within housing area	To liaise with Veterinary Department	July 2020	
		Potential mosquito spread disease	Fogging within housing area	Periodical	
		Estate employees' vehicle	Inspection of all vehicles and owners within estate	March 2020	

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		condition found with incomplete brake, head light, road tax & driving license			
		Transportation of workers to town	Public transport available since estate located near main road	February 2020	
		Fallen tree blocking main road	To remove fallen tree immediately	March 2020	
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 groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	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 heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.			Complied
Criterion 4.3: 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. - Minor compliance -	Sample contributions made by SOU 22 including the following: - Donations of daily needs for needy residence of nearby village (Kampung Pisang) during COVID-19 Movement Control Order (MCO) dated 20/5/2020 by Bukit Benut Estate - Donations of national flag (Jalur Gemilang) & state (Johor) flag to SK Ladang Bukit Benut and SJKT Ladang Bukit Benut dated 19/12/2019 by Bukit Benut Estate			Complied

		<p>- Raya donations to Kampung Mengkibol during COVID-19 Conditional Movement Control Order (CMCO) by Lambak Estate Breakfast event with workers on 1/5/2020 by Bukit Benut Palm Oil Mill</p>																
<p>Criterion 4.4: 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.</p>																		
<p>4.4.1</p>	<p>(C) 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> <p>- Critical (Major) compliance -</p>	<p>SOU 22 estates possessed evidences of legal ownership if its lands through possession of land titles. The estates have a list of all its land titles which have the information about names of lease, hectare, terms & conditions, lease period and grant numbers. Copies of the land titles were available at the estate's offices while the original were kept at headquarter. Evidence of legal ownership of the land including history of land tenure was verified during this audit.</p> <table border="1" data-bbox="1137 858 1906 1396"> <thead> <tr> <th>No</th> <th>OU</th> <th>Historical information</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Lambak</td> <td>Property was owned by Kumpulan Guthire, merged with Ellar Estate in 2007. In 2008 ownership under SDPB following a merger exercise</td> </tr> <tr> <td>2</td> <td>Bkt Benut</td> <td>Established in 60th under Castlefield (Klang) Rubber Estate Sdn Bhd. Property was acquired in transformed into Golden Hope Plantations Bhd. In 2008 ownership under SDPB following a merger exercise</td> </tr> <tr> <td>3</td> <td>CEP Niyor</td> <td>Established in 1962 First planting in 1965. Merger in 2008 to become SDPB.</td> </tr> <tr> <td>4</td> <td>Bukit Benut POM</td> <td>Property was acquired by HMPB and 1990 transformed into Golden Hope Plantations</td> </tr> </tbody> </table>	No	OU	Historical information	1	Lambak	Property was owned by Kumpulan Guthire, merged with Ellar Estate in 2007. In 2008 ownership under SDPB following a merger exercise	2	Bkt Benut	Established in 60 th under Castlefield (Klang) Rubber Estate Sdn Bhd. Property was acquired in transformed into Golden Hope Plantations Bhd. In 2008 ownership under SDPB following a merger exercise	3	CEP Niyor	Established in 1962 First planting in 1965. Merger in 2008 to become SDPB.	4	Bukit Benut POM	Property was acquired by HMPB and 1990 transformed into Golden Hope Plantations	<p>Complied</p>
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		Bhd. In 2008 ownership under SDPB following a merger exercise.		
<p>The land titles sighted among others as shown below:</p>				
No	Estate	No hak milik	No Lot /PT	Ha
1	Lambak	GN00101013	00526	397.734
		GN00083323	01317	519.616
		GN000134839	02983	505.857
		GN00099139	03152	372.108
		GN00121600	02985	226.26
		GN00041657	043255	234.253
		GN00101298	02538	287.529
		GN00327264	02984	448.984
		GN00094497	001532	617.218
2	Bkt Benut	GRN 98998	873	195.97
		GRN 98981	874	285.41
		GRN 94390	768	131.52
		GRN 94906	942	80.99
		GRN 94396	1414	185.35
	B Benut Mill	GRN 90182	1708	612.49

		3	CEP Niyor		
		GRN 101738	309	53.367	
		GRN 530151	8199	793.587	
		HSD 68985	6368	341.779	
		GRN 86982	86982	415.410	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	On-site verification through stakeholders' consultation confirmed that there is no land dispute recorded within SOU 22 operating units.			Complied
4.4.2a	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. - Minor compliance -	In case of any 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
4.4.2b	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. - Minor compliance -	On-site verification through stakeholders' consultation confirmed that there is no land dispute recorded within SOU 22 operating units. In case of any 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
4.4.2c	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.	On-site verification through stakeholders' consultation confirmed that there is no land dispute recorded within SOU 22 operating units. In case of any arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated			Complied

	- Minor compliance -	01/11/2008 documented the process in handling boundaries disputes.	
4.4.3	<p>(C) 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).</p> <p>- Critical (Major) compliance -</p>	Maps available as per sighted Location of Sime Darby Estates in Southern Region (Johor) maps and individual estates' field maps as well as boundary maps. Initial remote assessment reveal that there is no land dispute recorded. In case of any, dispute handling will be based on the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008.	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>On-site verification through stakeholders' consultation confirmed that there is no land dispute recorded within SOU 22 operating units.</p> <p>In case of any arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	Complied
4.4.5	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>On-site verification through stakeholders' consultation confirmed that there is no land dispute recorded within SOU 22 operating units.</p> <p>In case of any arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>On-site verification through stakeholders' consultation confirmed that there is no land dispute recorded within SOU 22 operating units.</p> <p>In case of any arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	Complied

Criterion 4.5: 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	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>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 Bukit Benut SOU 22. 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.</p>	Complied
4.5.2	<p>(C) 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 independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>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 Bukit Benut SOU 22. 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.</p>	Complied
4.5.3	<p>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.</p> <p>- Minor compliance -</p>	<p>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 Bukit Benut SOU 22. 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.</p>	Complied
4.5.4	<p>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.</p>	<p>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 Bukit Benut SOU 22. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing</p>	Complied

	- Minor compliance -	estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	
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. - Minor compliance -	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 Bukit Benut SOU 22. 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. - Minor compliance -	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 Bukit Benut SOU 22. 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
4.5.7	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. - Minor compliance -	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 Bukit Benut SOU 22. 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	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	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 Bukit Benut SOU 22. 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
Criterion 4.6: 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	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>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 Bukit Benut SOU 22. 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.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair 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.</p> <p>- Critical (Major) compliance -</p>	<p>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 Bukit Benut SOU 22. 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.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>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 Bukit Benut SOU 22. 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.</p>	Complied
4.6.4	<p>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.</p> <p>- Minor compliance -</p>	<p>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 Bukit Benut SOU 22. 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.</p>	Complied
<p>Criterion 4.7: 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.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p>	<p>Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008.</p>	Complied

	- Critical (Major) compliance -	Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
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. - Minor compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.8.2	(C) 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	Sime Darby Plantation Berhad 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

	certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	
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 rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable

5.1.4	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.8	<p>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.</p> <p>- Minor compliance -</p>	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable

Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.

5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, 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. - Minor compliance -	No independent smallholders within SOU 22 Bukit Benut POM certification unit	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	No independent smallholders within SOU 22 Bukit Benut POM certification unit	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	No independent smallholders within SOU 22 Bukit Benut POM certification unit	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	No independent smallholders within SOU 22 Bukit Benut POM certification unit	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	No independent smallholders within SOU 22 Bukit Benut POM certification unit	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) 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.	Sime Darby Plantation BERHAD has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02 nd December 2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter	Complied

	- Critical (Major) compliance -	(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.	
6.1.2	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>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.</p> <p>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.</p> <p>Overtime paid as per Employment Act 1995 (EA). Sampled workers are as 6.5.1.</p>	Complied
6.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no any discrimination for selection based on religion, gender and/or nationality. during their recruitment. The recruitment process mostly based on skills, capabilities and medical fitness necessary. 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 and/or caste.</p>	Complied
6.1.4	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no pregnancy test conducted in Bukit Benut SOU 22 Certification Unit. Confirmed through the interview session to workers, Medical Assistant and Gender Committee Minute of Meeting.</p>	Complied

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6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Latest gender committee meeting for Lambak Estate was conducted on 5/6/2020. Previous meeting conducted on 6/3/2020. Bukit Benut Palm Oil Mill gender committee meeting was latest conducted on 4/7/2020. CEP Niyor latest gender committee meeting was conducted on 5/6/2020.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>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. Sime Darby Plantation Berhad has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management. No sexual harassment case been report and confirmed through interviewed with the chairman and female workers.</p>	Complied
<p>Criterion 6.2: 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	<p>(C) 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> <p>- Critical (Major) compliance -</p>	<p>All the workers are under direct employment and some workshops are under contracts workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary etc. as per employment contract. MAPA Circular No.12/2019 dated 02/04/2019 effect from 01 January 2019 for 3 years were explained to workers through the NUPW meeting.</p>	Complied
6.2.2	<p>(C) 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</p>	<p>Sample agreements for Lambak Estate were sighted as following:</p> <ul style="list-style-type: none"> - Employee ID # 121083; Post: Harvesting Mandore; Date joined: 10/5/2016; Nationality: Malaysian 	Complied

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	<p>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>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> - Employee ID # 127410; Post: Harvester; Date joined: 4/11/2016; Nationality: Indonesian - Employee ID # 145721; Post: MTG Operator; Date joined: 21/9/2018; Nationality: Indonesian - Employee ID # 157687; Post: Tractor Driver; Date joined: 23/1/2020; Nationality: Indonesian - Employee ID # 151127; Post: Loose Fruit Collector; Date joined: 3/6/2019; Nationality: Indian <p>Additional:</p> <ul style="list-style-type: none"> - Employee ID # 150141; Post: Nursery Worker; Date joined: 2/5/2019; Nationality: Indonesian - Employee ID # 153779; Post: Sprayer; Date joined: 27/8/2019; Nationality: Indian - Employee ID # 150100; Post: Harvester; Date joined: 4/12/2014 (Transferred from Bukit Pelanduk Estate – joined LE on 18/6/2019); Nationality: Indonesian <p>Sample agreements for Bukit Benut Estate were sighted as following:</p> <ul style="list-style-type: none"> - Employee ID # 134574; Post: Field worker; Date joined: 1/7/2017; Nationality: Malaysian - Employee ID # 145879; Post: Piece rate worker; Date joined: 25/9/2018; Nationality: Indian - Employee ID # 153767; Post: Harvester; Date joined: 26/8/2019; Nationality: Indonesian - Employee ID # 136491; Post: Field worker; Date joined: 24/8/2017; Nationality: Nepal - Employee ID # 152027; Post: General worker; Date joined: 1/7/2019; Nationality: Malaysian 	
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		<p>Sample agreements for Bukit Benut Palm Oil Mill workers sighted as following:</p> <ul style="list-style-type: none"> - Employee ID # 104242; Post: Auxiliary Police; Date joined: 1/8/2014; Nationality: Malaysian - Employee ID # 124553; Post: Mill Operator; Date joined: 23/8/2016; Nationality: Indonesian - Employee ID # 145923; Post: Mill Operator; Date joined: 29/9/2018; Nationality: Indonesian - Employee ID # 124552; Post: Mill Operator; Date joined: 23/8/2016; Nationality: Indonesian - Employee ID # 127679; Post: Mill Operator; Date joined: 1/11/2016; Nationality: Malaysian <p>Sample agreements for CEP Niyor Estate workers sighted as following:</p> <ul style="list-style-type: none"> - Employee ID # 65902; Post: General Worker; Date joined: 1/5/2011; Nationality: Malaysian - Employee ID # 96423; Post: General Worker; Date joined: 11/10/2013; Nationality: Malaysian - Employee ID # 120812; Post: General Worker General Worker; Date joined: 22/4/2016; Nationality: Indian - Employee ID # 132617; Post: General Worker; Date joined: 6/4/2017; Nationality: Malaysian - Employee ID # 135613; Post: Harvester; Date joined: 15/8/2017; Nationality: Indian - Employee ID # 153871; Post: Harvester; Date joined: 28/8/2019; Nationality: Indian 	
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		<ul style="list-style-type: none"> - Employee ID # 119781; Post: Harvesting-Grabber; Date joined: 15/2/2016; Nationality: Indonesian Employee ID # 138503; Post: Harvesting-Loose Fruit; Date joined: 15/2/2017; Nationality: Indonesian 	
6.2.3	<p>(C) 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>- Critical (Major) compliance -</p>	<p>Sample payslip of March, April & June 2020 for Bukit Benut Estate were sighted as following:</p> <ul style="list-style-type: none"> - Employee ID # 134574; Post: Field worker; Date joined: 1/7/2017; Nationality: Malaysian - Employee ID # 145879; Post: Piece rate worker; Date joined: 25/9/2018; Nationality: Indian - Employee ID # 153767; Post: Harvester; Date joined: 26/8/2019; Nationality: Indonesian - Employee ID # 136491; Post: Field worker; Date joined: 24/8/2017; Nationality: Nepal - Employee ID # 152027; Post: General worker; Date joined: 1/7/2019; Nationality: Malaysian <p>Sample payslips for Bukit Benut Palm Oil Mill workers sighted as following:</p> <ul style="list-style-type: none"> - Employee ID # 104242; Post: Auxiliary Police; Date joined: 1/8/2014; Nationality: Malaysian - Employee ID # 124553; Post: Mill Operator; Date joined: 23/8/2016; Nationality: Indonesian - Employee ID # 145923; Post: Mill Operator; Date joined: 29/9/2018; Nationality: Indonesian - Employee ID # 124552; Post: Mill Operator; Date joined: 23/8/2016; Nationality: Indonesian 	Complied

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		<p>- Employee ID # 127679; Post: Mill Operator; Date joined: 1/11/2016; Nationality: Malaysian</p> <p>Sighted the mill obtained permit from JTK for salary deduction of ASB and Tabung Haji savings as per letter ref. # JTK/KG/10103 03994/01117/bil. 12/2011; Date: 12/12/2011</p> <p>Sample payslips for CEP Niyor Estate workers sighted as following:</p> <ul style="list-style-type: none"> - Employee ID # 65902; Post: General Worker; Date joined: 1/5/2011; Nationality: Malaysian - Employee ID # 96423; Post: General Worker; Date joined: 11/10/2013; Nationality: Malaysian - Employee ID # 120812; Post: General Worker General Worker; Date joined: 22/4/2016; Nationality: Indian - Employee ID # 132617; Post: General Worker; Date joined: 6/4/2017; Nationality: Malaysian - Employee ID # 135613; Post: Harvester; Date joined: 15/8/2017; Nationality: Indian - Employee ID # 153871; Post: Harvester; Date joined: 28/8/2019; Nationality: Indian - Employee ID # 119781; Post: Harvesting-Grabber; Date joined: 15/2/2016; Nationality: Indonesian - Employee ID # 138503; Post: Harvesting-Loose Fruit; Date joined: 15/2/2017; Nationality: Indonesian <p>Sighted the estate obtained permit from JTK for salary deduction of SAJ water payment as per permit serial. # PP3/29/0144; Date: 1/12/1998 and permit for deduction of TNB electricity payment as per permit serial. # PP3/29/095/2004; Date: 1/8/2004.</p>	
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6.2.4	<p>(C) 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>- Critical (Major) compliance -</p>	<p>Medical Assistant (MA) conduct the weekly inspection of housing within Bukit Benut Estate as per records of Housing Complex / Nest / Community Hall Inspections which was latest conducted on 16/7/2020. Sighted that MA reported there was issue on trash and litter surrounding workers’ quarters for block 154A/B in-progress of clearing. Total inspection score was 90%. Previous inspection was conducted on 9/7/2020.</p> <p>Based on the records of Water Analysis Test Report; Test report # IE490/2020; Date tested: 9/7/2020; Date issued: 20/7/2020 the following results were shown:</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <thead> <tr> <th>Lab Code</th> <th>Sample Ref.</th> <th>pH (25°C)</th> <th>TDS (mg/L)</th> <th>Turbidity (NTU)</th> <th>Chloride (mg/L)</th> <th>Al* (mg/L)</th> </tr> </thead> <tbody> <tr> <td>C-W-IE-202007-001598</td> <td>1A – Ellar Div.</td> <td style="text-align: center;">3.9</td> <td style="text-align: center;">116</td> <td style="text-align: center;">0.3</td> <td style="text-align: center;">28</td> <td style="text-align: center;">0.668</td> </tr> <tr> <td>C-W-IE-202007-01599</td> <td>2A – Ellar Div.</td> <td style="text-align: center;">3.5</td> <td style="text-align: center;">92</td> <td style="text-align: center;">0.6</td> <td style="text-align: center;">21</td> <td style="text-align: center;">11.023</td> </tr> <tr> <td>C-W-IE-202007-01600</td> <td>3A – Ellar Div.</td> <td style="text-align: center;">6.4</td> <td style="text-align: center;">132</td> <td style="text-align: center;">0.4</td> <td style="text-align: center;">26</td> <td style="text-align: center;">9.851</td> </tr> </tbody> </table> <p>Records of Water Analysis Test Report for domestic water sample; Test Report # IE380/2020; Date tested: 29/5/2020; Date issued: 5/6/2020 the following results were shown:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Lab Code</th> <th>Sample Ref.</th> <th>pH (25°C)</th> <th>TDS (mg/L)</th> <th>Turbidity (NTU)</th> <th>Chloride (mg/L)</th> <th>Al* (mg/L)</th> </tr> </thead> <tbody> <tr> <td>C-W-D-202005-001215</td> <td>1D – Domestic water</td> <td style="text-align: center;">6.3</td> <td style="text-align: center;">112</td> <td style="text-align: center;">0.2</td> <td style="text-align: center;">23</td> <td style="text-align: center;">0.047</td> </tr> </tbody> </table>	Lab Code	Sample Ref.	pH (25°C)	TDS (mg/L)	Turbidity (NTU)	Chloride (mg/L)	Al* (mg/L)	C-W-IE-202007-001598	1A – Ellar Div.	3.9	116	0.3	28	0.668	C-W-IE-202007-01599	2A – Ellar Div.	3.5	92	0.6	21	11.023	C-W-IE-202007-01600	3A – Ellar Div.	6.4	132	0.4	26	9.851	Lab Code	Sample Ref.	pH (25°C)	TDS (mg/L)	Turbidity (NTU)	Chloride (mg/L)	Al* (mg/L)	C-W-D-202005-001215	1D – Domestic water	6.3	112	0.2	23	0.047	OFI
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		<p>It was indicated in the lab report that font written in Bold Italics does not conform with NSDWQ for domestic use as following:</p> <table border="1" data-bbox="1137 443 1921 555"> <thead> <tr> <th>Parameters</th> <th>pH (25°C)</th> <th>TDS (mg/L)</th> <th>Turbidity (NTU)</th> <th>Chloride (mg/L)</th> <th>Al* (mg/L)</th> </tr> </thead> <tbody> <tr> <td>Limit</td> <td>6.6 – 9.0</td> <td>1000</td> <td>5</td> <td>250</td> <td>0.2</td> </tr> </tbody> </table> <p>The result shown current drinking water pH not complying for pH. Line site inspection for CEP Niyor Estate was last conducted on 18/7/2020. The form Housing Complex/Nest/Community Hall Inspections – Part B: Communicable Disease Controls; 8. Free from stray dogs was ticked as comply (1). Visit at site found there are at least 5 stray dogs with one seems like having scabies wound lay down at few houses within line sites. The inspection form for at least previous four weeks dated on 10/7/2020, 27/6/2020, 31/5/2020 and 24/5/2020 also shown the same comply (1) ticks. Latest VMO visit to CEP Niyor Estate was conducted on 11/7/2020 by Dr. Helen Tan of Klinik Kluang. Implementation of workers' housing (line site) weekly inspection within operating units using the "Housing Complex/Nest/Community Hall Inspections" form could be further improved its consistency of information reported to reflect actual conditions and/or situation of whole or specific area/building/house within the operating units. hence, an OFI has been raised on the matter.</p>	Parameters	pH (25°C)	TDS (mg/L)	Turbidity (NTU)	Chloride (mg/L)	Al* (mg/L)	Limit	6.6 – 9.0	1000	5	250	0.2	
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Limit	6.6 – 9.0	1000	5	250	0.2										
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -</p>	<p>The housing area for operation units within SOU 22 located nearby Kluang town where the accessibility to the grocery store and shops is easily available.</p>	Complied												

<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>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 endeavour 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 (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).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils 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.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (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). 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.</p> <p><i>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 (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).</i></p>	<p>Prevailing Wage Assessment (RM) by SDP HQ HRD based on salary paid to workers within SOU 22 for period of May 2020 resulted the average total received per month salary as following:</p> <ul style="list-style-type: none"> - Local RM 1,629.15/month - Local RM 1,679.34/month <p>Assessment confirmed that Sime Darby Plantation SOU 22 operating units paid decent wage which is higher than national Minimum Wage Order itself.</p>	<p>Complied</p>
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	<p>Once these 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:</p> <ul style="list-style-type: none"> • 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 a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>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.</p> <p>- Minor compliance -</p>	<p>There are no casual workers hired by operating units within SOU 22. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full-time employment used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2.</p>	Complied
<p>Criterion 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.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Social Policy established since 2015 covers the commitment of the company towards respecting the rights of all personnel to form and join trade unions of their choice to bargain collectively. It was communicated during workers general assembly, muster briefing and meetings.</p> <p>During the interview with workers, there are no evidence received that there is no restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union. It was also confirmed during the on-site internal stakeholder’s consultation session.</p>	Complied

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6.3.2	<p>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> <p>- Minor compliance -</p>	<p>Minutes of meeting available for Bukit Benut Estate for sample NUPW meeting conducted on 5/6/2020. Meeting was attended by estate management together with NUPW committee representatives. Other minutes of meeting records shown latest Lambak Estate NUPW committee meeting was conducted on 18/12/2019 while Bukit Benut POM NUPW committee meeting was conducted on 4/7/2020. CEP Niyor latest NUPW committee meeting with estate management was conducted on 11/2/2020.</p>	Complied
6.3.3	<p>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> <p>- Minor compliance -</p>	<p>Evidence based on minutes of meeting records and interview shown that the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation through selection also based on the election meeting.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>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.</p> <p>- Minor compliance -</p>	<p>The Group Sustainability & 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"> • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. • Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. • 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. • Enhancing Safety and Health: We provide a safe and 	Complied

		<p>healthy working environment for our employees and workers in our operations and support the wellbeing of our communities.</p> <ul style="list-style-type: none"> • 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. • Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. • 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. <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 & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children as per sample sighted as following:</p> <ul style="list-style-type: none"> - Fire Fighting & Protection System Servicing and Maintenance (Contract Agreement) Agreement Between Sime Darby Plantation Berhad KKS Bukit Benut and Kulimsafety Training and Services Sdn. Bhd.; Contract period: 10/2/2020 – 10/2/2022 <p>Sime Darby Plantation Berhad Contract Document for Supervision of Electrical Installation and Facilities for Sime Darby Estates – (Johor North Region, Johor Central Region and Johor South</p>	
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		Region); Mills – (Johor Zone); Contractor: One Alpha Electrical Services Sdn. Bhd.; Contract period: 1/1/2020 – 31/12/2020	
6.4.2	<p>(C) 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>- Critical (Major) compliance -</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 & 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).	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	There is no young worker employed by operating units within SOU 22.	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>- Minor compliance -</p>	The unit of certification has communicated the Human Right Charter, Social Policy and Vendor COBC through the stakeholder meeting and muster briefing.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) 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>- Critical (Major) compliance -</p>	<p>The Group Sustainability & 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"> • Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. • Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. 	Complied

		The policy was communicated through the Gender Committee meeting conducted quarterly.	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	Sime Darby Plantation Berhad 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	<p>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.</p> <p>- Minor compliance -</p>	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 Benut Palm Oil Mill dated on 4/7/2020.	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	Gender committee has been formed in each operating unit for the anonymity reporting medium in case of sexual harassment grievances by female employees.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. Contract substitution 	The recruitment cost was 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 Amozza Travels for India (INR 50000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.	Complied

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	<ul style="list-style-type: none"> • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</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>Based on sampled (refer indicator 6.2.2) agreement sighted</p> <ul style="list-style-type: none"> - Overtime was given voluntarily - The termination of service clearly stated that the termination of employment if: <ol style="list-style-type: none"> 1. The company is not satisfied with your performance 2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term. 3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime. 4. You have breached any express or implied terms of your employment. 5. Fail medical examination based on FOMEMA result. 6. Involved in any act that will affect the reputation of the company. <p>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.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p>	<p>Sime Darby Plantation Berhad has implemented a Sime Darby's Human Rights Charter on where they committed as below:</p> <ol style="list-style-type: none"> a. Providing equal opportunity 	Complied

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	<p>- Critical (Major) compliance -</p>	<p>b. Respecting freedom of association c. Eradicating any form of exploitation d. Ensuring favorable working conditions 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>Criterion 6.7: 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>(C) The responsible person(s) for H&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>- Critical (Major) compliance -</p>	<p>The Estate and Mill Manager in SOU 22 has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter dated 31/12/2019 signed by the Regional CEO.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training. Sighted the minutes meeting records as follows:</p> <p>Bukit Benut POM</p> <p>i. 30/1/2020 ii. 12/3/2020 iii. 25/9/2019</p>	<p>Complied</p>

		iv. 25/6/2019 Bukit Benut Estate i. 8/6/2020 ii. 11/3/2020 iii. 11/12/2019 iv. 11/10/2019 Lambak Estate i. 11/5/2020 ii. 11/2/2020 iii. 2/11/2019 iv. 2/8/2019	
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>- Minor compliance -</p>	<p>Accident of emergency procedure is presented in Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3.</p> <p>Noted during interview with workers show the satisfactory understanding on the emergency procedure established such as on housing evacuation during fire and basic firefighting using fire extinguisher.</p>	Complied
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all</p>	<p>The estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and</p>	Complied

	<p>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>- Critical (Major) compliance -</p>	<p>Pictorial Safety Standard (PSS) dated 17/3/2008. Sighted during site visit at all estates visited, the sprayers were provided with wellington boots, apron, nitrile gloves and half face respirator. The PPE issuance records were available for review.</p> <p>Bukit Benut POM</p> <p>PPE was provided to all workers as per SOP established. Sighted during site visit at boiler station, steriliser station and loading ramp, the workers wear PPE as per SOP. PPE issuance were recorded in PPE log book. Sighted the records of PPE by workers recorded in the log book.</p> <p>Bukit Benut Estate</p> <p>Noted during interview with sprayers, noted the PPE provided for free to all sprayers such as safety google, apron, nitrile gloves, respirator and wellington boots. Sighted the PPE issuance record for employee ID no.:</p> <ul style="list-style-type: none"> i. N88959x, ii. AU00012x iii. AT61636x <p>Lambak Estate</p> <p>Noted during interview with sprayers and harvester, sighted the PPE provided as per SOP established. Sighted the PPE issuance recorded in PPE Issuance log book.</p>	
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<p>6.7.4</p>	<p>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> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances.</p> <p>Bukit Benut POM</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for February and March 2020 for 87 workers.</p> <p>Bukit Benut Estate</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for June 2020.</p> <p>Lambak Estate</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for April 2020 and May 2020 for 277 workers.</p> <p>CEP Niyor</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for April 2020 and May 2020 for 158 and 164 workers respectively workers.</p>	<p>Complied</p>
<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p>	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA)</p>	<p>Complied</p>

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	<p>- Minor compliance -</p>	<p>metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2019 as reported to DOSH as follows:</p> <table border="1" data-bbox="1137 507 1939 837"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Bukit Benut POM</td> <td>2</td> <td>35</td> </tr> <tr> <td>Bukit Benut estate</td> <td>7</td> <td>165</td> </tr> <tr> <td>Lambak Estate</td> <td>2</td> <td>52</td> </tr> <tr> <td>CEP Nyoor</td> <td>5</td> <td>17</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	Bukit Benut POM	2	35	Bukit Benut estate	7	165	Lambak Estate	2	52	CEP Nyoor	5	17	
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Principle 7: Protect, conserve and enhance ecosystems and the environment

Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>SOU 22 Estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans.</p> <p>a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by SOPs ref OPC 04a, OPC 04b, OPC 04f, OPC 04g and OPC 04h.</p> <p>b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>,</p>	<p>Complied</p>
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		<p><i>Euphorbia heterophylla</i>, along the roadsides and designated points in the fields and also within the nursery perimeter. To develop beneficial plant nursery comprised of the beneficial plant.</p> <p>c) The plan also advocated single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff.</p> <p>d) Census records for Ganoderma affected palms were sighted</p> <p>e) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PA /Agronomist. Baiting are continued until bait acceptance threshold level</p>	
7.1.2	<p>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> <p>- Minor compliance -</p>	<p>This is not practiced in the 3 estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in SOU 22 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <p>a) EQMS-SOP-SectionB2 - Under felling/clearing & land preparation</p> <p>b) Carbon Policy</p>	Complied

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		SDP has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.	
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) 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> <p>- Critical (Major) compliance -</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease. Some of recommended pesticides are:</p> <p>Immature planting (sample)</p> <ul style="list-style-type: none"> i. General weeds : Glyphosate ii. Pennisetum polystachion : Metsulfuron Methyl iii. Stenochlaena palustris : Sodium chlorate <p>Mature planting</p> <ul style="list-style-type: none"> i. Grass weed and Asystasia : glyphosate & 2,4-D amine <p>The selection is also evaluated by the agronomist during his visit to the estate</p>	Complied
7.2.2	<p>(C) 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>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>Sighted the sampled records of pesticides usage per ha at estate visited as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Bukit Benut</th> <th>Lambak</th> <th>CEP Niyor</th> </tr> </thead> <tbody> <tr> <td>Jan 19</td> <td>0.98</td> <td>0.16</td> <td>0.54</td> </tr> <tr> <td>Feb 19</td> <td>0.92</td> <td>0.22</td> <td>0.94</td> </tr> <tr> <td>Mar 19</td> <td>1.80</td> <td>0.17</td> <td>1.21</td> </tr> <tr> <td>Apr 19</td> <td>1.10</td> <td>0.20</td> <td>2.05</td> </tr> <tr> <td>May 19</td> <td>3.19</td> <td>0.17</td> <td>0.50</td> </tr> <tr> <td>Jun 19</td> <td>5.10</td> <td>0.14</td> <td>1.09</td> </tr> <tr> <td>Jul 19</td> <td>3.05</td> <td>3.08</td> <td>0.63</td> </tr> <tr> <td>Aug 19</td> <td>0.65</td> <td>0.67</td> <td>0.29</td> </tr> <tr> <td>Sep 19</td> <td>0.51</td> <td>0.51</td> <td>0.06</td> </tr> <tr> <td>Oct 19</td> <td>0.60</td> <td>0.60</td> <td>1.44</td> </tr> <tr> <td>Nov 19</td> <td>2.59</td> <td>2.59</td> <td>1.71</td> </tr> <tr> <td>Dec 19</td> <td>5.55</td> <td>4.58</td> <td>0.37</td> </tr> </tbody> </table>	Month	Bukit Benut	Lambak	CEP Niyor	Jan 19	0.98	0.16	0.54	Feb 19	0.92	0.22	0.94	Mar 19	1.80	0.17	1.21	Apr 19	1.10	0.20	2.05	May 19	3.19	0.17	0.50	Jun 19	5.10	0.14	1.09	Jul 19	3.05	3.08	0.63	Aug 19	0.65	0.67	0.29	Sep 19	0.51	0.51	0.06	Oct 19	0.60	0.60	1.44	Nov 19	2.59	2.59	1.71	Dec 19	5.55	4.58	0.37	
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.</p> <p>The estates visited has established management plan to reduce chemical usage FY 2020. The mitigation plan include:</p> <ul style="list-style-type: none"> i. To reduce wastages of chemical spraying to harvesters' path or inter row ii. To reduce pesticide usage for immature palm <p>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>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>No evidence of prophylactic use of pesticides in the estates visited.</p>	Complied
7.2.5	<p>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.</p> <p>The due diligence refers to:</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 3.3: Protect and disclose environmental impacts and minimise resource use stated:</p>	Complied

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	<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>- Minor compliance -</p>	<p>'We aim to minimise our foot print and continuously reduce our use of resources through:</p> <p>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 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 II, III & IV chemical used at visited estates.</p>	
7.2.6	<p>(C) 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 Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly medical check-up done by the Medical Assistant. Observed the implementation during site visit and workers interview in following estate as per criteria 3.7.2.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Empty pesticides container were identified as recycle waste. All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors, SS Setia Technology Enterprise. Refer approval letter from DOE no AS</p>	Complied

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		<p>(B) J 91/110/619/069 Jld. 3(37) dated 24/10/2018. Sighted the implementation of the triple rinse during site visit at the storage area.</p> <p>Latest sampled records of empty containers disposal as follows:</p> <p>Bukit Benut Estate</p> <p>i. Latest empty chemical container disposal was conducted 10/4/2019 by SS Setia Technology Enterprise.</p> <p>Lambak Estate</p> <p>ii. Latest empty chemical container disposal was conducted 10/4/2019 by SS Setia Technology Enterprise as per sales receipt no. 1648.</p>	
7.2.9	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	No aerial spray conducted at all operating units in SOU 22.	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Estates visited conducted medical surveillance on annually basis base on CHRA recommendation. Sighted the sample records of medical surveillance conducted as follows:</p> <p>Bukit Benut Estate</p> <p>i. Latest medical surveillance for chemical handlers was conducted in June 2020 by certified OHD with Reg. no. HQ/08/DOC/00/597. 28 workers were send for surveillance and found fit to work as chemical handlers.</p>	Complied

		<p>ii. Monthly medical check-up for chemical handlers were conducted monthly by the estate medical assistant. Sighted the records of medical check-up conducted in the month of April, May and June 2020 conducted during VMO visit at the estate.</p> <p>Lambak Estate</p> <p>i. Latest medical surveillance for chemical handlers was conducted on 8/10/2020 by certified OHD with Reg. no. HQ/08/DOC/00/597. 28 workers were send for surveillance and found fit to work as chemical handlers.</p> <p>ii. The Medical Assistant conducted the medical screening for all sprayers on monthly basis. Sighted the medical screening records for the month of March, April, May and June 2020 conducted by the Medical Assistant and reviewed by the Visiting Medical Officer.</p> <p>CEP Niyor Estate</p> <p>i. Latest medical surveillance was conducted on 18 – 19/11/2019. 13 workers were sent for surveillance and found fit to work as chemical handlers.</p> <p>ii. Monthly medical check-up for chemical handlers were conducted monthly by the estate medical assistant. Sighted the records of medical check-up conducted in the month of May, June and July 2020 conducted during VMO visit at the estate.</p>	
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7.2.11	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>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 displayed on the notice board at few strategic place in the estate.</p> <p>Noted during interview with the workers (including woman workers), the understanding on prohibition of person under age of 18 and pregnant or breastfeeding woman were satisfactory.</p> <p>The medical assistant conducted monthly medical screening and all chemical handlers went through medical surveillance on annually basis. Workers found unfit to work as chemical handlers will be transferred to another suitable jobs.</p>	Complied												
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.															
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>SOU 22 Bkt Benut Mill and all the three estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2020 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1137 1015 1917 1334"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.	Complied
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		<p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2020. The waste generated from the mill/estates operations as shown below:</p> <table border="1" data-bbox="1167 520 1906 737"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill/estate complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fiber, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>The pollution identified from the 6mill/estates activities:</p> <table border="1" data-bbox="1167 831 1906 983"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>Emission from Boilers/vehicles/engines</td> </tr> <tr> <td>2</td> <td>Odor & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table>		Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill/estate complex and employees' quarters	3	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex		Type of waste	Details	1	Black smoke	Emission from Boilers/vehicles/engines	2	Odor & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance	
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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>In Bukit Benut POM and the estates in SOU 22, procedure SD/SDP/PSQM (ESH)/203-EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Management and disposal of waste water 2020 has been established compiled by Assistant Engineer/Assistants/Staff.</p> <p>b) Waste Management Plan 2020 has been established prepared by QA and verified by the Assistant Engineer/Assistants/Staff.</p> <p>c) Waste Management Plan 2020 has been established in Jan 2020. Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact Identification (file no:</p>	<p>Non-compliance</p>																											

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- SM/5.2/EAI) improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.
- d) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.
 - e) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to the following vendors registered with DOE. DOE letter of authority was sighted and verified.

Estate	Date	SW 305	SW 404	SW 322	SW 410	SW 409
BBE	17/2/20	-	0.037	-	-	-
BBE	16/7/20	0.070	-	-	0.030	-
BBE	04/7/19	-	-	-	0.089	-
BBE	18/4/19	-	-	-	0.048	-
LE	02/7/20	0.070	-	-	0.119	-
LE	17/2/20	-	0.001	-	-	-
CNE	17/2/20	-	0.0048	-	-	-

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CNE	20/5/20	0.420	-	-	0.005	-
BBPOM	17/6/20	-	-	0.367	0.047	0.653
BBPOM	30/9/19	-	-	-		

The CU scheduled waste is disposed to the following vendors registered with DOE.

Estate	Date	SW Buyers/Vendor
Bkt Benut	Jan 2020	Perniagaan Saudara Baru
Lambak	Jan 2020	Perniagaan Saudara Baru
CEP Niyor	Jan 2020	Perniagaan Saudara Baru
All (clinical)	Apr 2020	Kualiti Alam Sdn Bhd
BB POM	Jan 2020	Kualiti Alam Sdn Bhd

Clinical waste are despatch to Kualiti Alam Bhd and other SW are disposed to M/s Perniagaan Saudara Baru in Ulu Tiram. Empty containers were despatched to licensed buyer namely SS Setia Enterprise Baru registered with Jabatan Pertanian DOE dated 07/12/2015. Records of despatches sighted as follows;

	Estate	Date	Chemical containers	R bait boxes
1	Bkt Benut	10/4/19	1097 pcs	0.356 kg
2	Lambak	12/5/20	100 pcs	-
3	CEP Niyor	09/6/20	60 pcs	0.130

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		<p>Domestic waste for the operating units in SOU 22 was disposed as follows;</p> <table border="1" data-bbox="1167 454 1883 687"> <thead> <tr> <th></th> <th>Estate</th> <th>Disposal site</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Benut</td> <td>P2000C</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>2</td> <td>CEP Niyor</td> <td>P2011A</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>3</td> <td>Lambak</td> <td>P2004A</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>4</td> <td>BBPOM</td> <td>P2000C</td> <td>Collection 2/3 x week</td> </tr> </tbody> </table> <p>During the site visit to the landfill of Lambak Estate it was sighted that there were several motor oil containers (2T/4T Oil) disposed in the domestic waste land. The understanding of the disposal materials into the landfill was not fully understood to comply with the Operational Control Procedure for Landfill Management In Estate SD/SDP/PSQM(ESH)203-EN7) dated 13th march 2017 hence an NCR is raised.</p>		Estate	Disposal site	Remarks	1	Bkt Benut	P2000C	Collection 2/3 x week	2	CEP Niyor	P2011A	Collection 2/3 x week	3	Lambak	P2004A	Collection 2/3 x week	4	BBPOM	P2000C	Collection 2/3 x week	
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7.3.3	<p>The unit of certification does not use open fire for waste disposal. - Minor compliance -</p>	<p>There was no land preparation in SOU 22 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> c) EQMS-SOP-SectionB2 - Under felling/clearing & land preparation d) Carbon Policy <p>SDP has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire</p>	Complied																				

		had been used to prepare land for replanting in the estate No fire was used for waste disposal.	
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield as per SOP bellows: The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents; a) EQMS chapter B8 - Leguminous Cover Crops b) EQMS chapter B14 – Manuring c) ARM Section 8 – Manuring	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	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. As per company SOP, the soil sampling analysis carried at 5 years interval. The leaf analysis and soil analysis report was made available for review. Noted the analysis report for estate visited as follows: Bukit Benut Estate Latest soil sampling was conducted in 13/2/2019 as per report no. S35/2019 dated 5/4/2019. Latest leaf sampling analysis was carried out in December 2019. The report was stated in the 2020/21 Agronomic and Fertilizer Recommendations Report dated 6/3/2020.	Complied

		<p>Lambak Estate Latest soil sampling was conducted in 3/3/2015 as per report no. S37/2015 dated 24/4/2015. Latest leaf sampling analysis was carried out in December 2019. The report was stated in the 2020/21 Agronomic and Fertilizer Recommendations Report dated 20/3/2020.</p> <p>CEP Niyor Latest soil sampling was conducted in 19/11/2018 as per report no. S2/2019 dated 2/1/2019.</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>- Minor compliance -</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"> i. EFB applied at selected fields at the estates. ii. Fibre and POM were use as compost material. iii. Palm residues after planting were left in the biomass row to decompose. <p>Sighted the sampled records for EFB disposal as follows:</p> <table border="1" data-bbox="1137 1026 1944 1369"> <thead> <tr> <th>Month</th> <th>Bukit Benut</th> <th>Lambak</th> <th>CEP Niyor</th> </tr> </thead> <tbody> <tr> <td>Jan 20</td> <td>1299.39</td> <td>921.02</td> <td>94.87</td> </tr> <tr> <td>Feb 20</td> <td>2369.48</td> <td></td> <td></td> </tr> <tr> <td>Mar 20</td> <td>2083.11</td> <td>19.11</td> <td></td> </tr> <tr> <td>Apr 20</td> <td>2422.48</td> <td></td> <td></td> </tr> <tr> <td>May 20</td> <td>2565.03</td> <td></td> <td></td> </tr> </tbody> </table>	Month	Bukit Benut	Lambak	CEP Niyor	Jan 20	1299.39	921.02	94.87	Feb 20	2369.48			Mar 20	2083.11	19.11		Apr 20	2422.48			May 20	2565.03			Complied
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		Jun 20		257.48	
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p>The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. Monitoring was conducted by heads of Performance Monitoring Unit.</p> <p>Sighted the records of fertiliser application as follows:</p> <p>Bukit Benut Estate</p> <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>Month program: Feb 2020</p> <p>Field: 2000B</p> <p>Ha program: 62.21 ha</p> <p>Type: Ammonium Chloride</p> <p>Rate/palm: 1.90 – 2.10 kg/palm (base on blocks)</p> <p>Month completed: 23/2/2020</p> <p>Month program: May 2020</p> <p>Field: 2011A</p> <p>Ha program: 63.54 ha</p> <p>Type: Kieserite</p>			Complied

		<p>Rate/palm: 0.90 Month completed: 26/6/2020</p> <p>Lambak Estate The estate maintain the records of manuring application as per recommendation by the agronomist. Observed application records as per agronomist recommendation: Month program: Feb 2020 Field: 2002C Ha program: 22.57 ha Type: Ammonium Chloride Rate/palm: 2.10 kg/palm Month completed: 11/2/2020</p> <p>Month program: Mar 2020 Field: 2005A1 Ha program: 88.67 ha Type: MOP Rate/palm: 1.50 kg/palm Month completed: 25/2/2020</p> <p>CEP Niyor Estate</p>	
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		<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>Month program: May 2020 Field: 2001B Ha program: 33.04 ha Type: Kieserite Rate/palm: 0.80 kg/palm Month completed: 2/7/2020</p> <p>Month program: feb - Mar 2020 Field: 1997A1 Ha program: 28.05 ha Type: AC Rate/palm: 1.90 kg/palm Month completed: 23/1/2020w5</p>											
<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>													
<p>7.5.1</p>	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows:</p> <table border="1" data-bbox="1198 1289 1865 1383"> <thead> <tr> <th>No</th> <th>%</th> <th><i>Bkt Benut</i></th> <th><i>Lambak</i></th> <th><i>CEP Niyor</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Lunchu</td> <td>31.41</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	No	%	<i>Bkt Benut</i>	<i>Lambak</i>	<i>CEP Niyor</i>	1	Bkt Lunchu	31.41	-	-	<p>Complied</p>
No	%	<i>Bkt Benut</i>	<i>Lambak</i>	<i>CEP Niyor</i>									
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7.5.2	<p>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> <p>- Minor compliance -</p>	<p>Like all SDPB Estates, the estates visited in SOU 22 continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> a) Slope & River Protection Policy b) Buffer Zone & 25-degree slope and in item 8 Section 4 c) Land Preparation for Terracing in ARM Manual. <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft</p>	Complied																																																							

		<p>vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps were provided by the R&D Precision Agriculture Unit with details as follows:</p> <table border="1" data-bbox="1189 595 1852 849"> <thead> <tr> <th>No</th> <th>Topography</th> <th>Bkt Benut</th> <th>Lambak</th> <th>CEP Niyor</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-2</td> <td>9.04</td> <td>14.92</td> <td>27.83</td> </tr> <tr> <td>2</td> <td>2-6</td> <td>44.37</td> <td>50.99</td> <td>56.69</td> </tr> <tr> <td>3</td> <td>6-12</td> <td>35.98</td> <td>25.49</td> <td>14.24</td> </tr> <tr> <td>4</td> <td>12-20</td> <td>9.97</td> <td>5.80</td> <td>1.21</td> </tr> <tr> <td>5</td> <td>20-25</td> <td>0.64</td> <td>1.46</td> <td>0.03</td> </tr> <tr> <td>6</td> <td>>25</td> <td>0.04</td> <td>0.60</td> <td>0.00</td> </tr> <tr> <td></td> <td>Total</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> </tbody> </table>	No	Topography	Bkt Benut	Lambak	CEP Niyor	1	0-2	9.04	14.92	27.83	2	2-6	44.37	50.99	56.69	3	6-12	35.98	25.49	14.24	4	12-20	9.97	5.80	1.21	5	20-25	0.64	1.46	0.03	6	>25	0.04	0.60	0.00		Total	100%	100%	100%	
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7.5.3	<p>There is no new planting of oil palm on steep terrain. - Minor compliance -</p>	<p>This compliance being addressed in the "<i>Slope and River Protection</i>" signed by the CEO dated Jan 2015 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly". There were 2 sites intended for the new planting in SOU 22. Details as follows;</p> <table border="1" data-bbox="1160 1246 1765 1383"> <thead> <tr> <th></th> <th>Field</th> <th>Previous area</th> <th>Year of conversion</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>P95C1</td> <td>Fallow area</td> <td>Jan 2021 replant</td> </tr> <tr> <td>2</td> <td>P01A1</td> <td>Fallow area</td> <td>June 2020 reopen</td> </tr> </tbody> </table>		Field	Previous area	Year of conversion	1	P95C1	Fallow area	Jan 2021 replant	2	P01A1	Fallow area	June 2020 reopen	Complied																												
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Total	144.84 ha					
Criterion 7.6: 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.						
7.6.1	(C) 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. - Critical (Major) compliance -	The soil series for the new planting area PR2020A and PR2021 of 144.84 ha are Beserah, Lambak (P95C1) and Rengam series (P01A1). This is an ex OP area left by the management more than 6 years upon observation of steep area. This was resurveyed on Oct 2018 and decided by the management that the area is less than 25 degree.	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. - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil at Lambak Estate new planting area. .	Complied			
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are done and available in a soil map at all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.	Complied			

Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	There is peat soil of 11.91 ha field no P13D situated in the Talisman Division Bukit Benut Estate.	Complied
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	There is peat soil of 11.91 ha field no P13D situated in the Talisman Division Bukit Benut Estate.	Complied
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	Peat subsidence (11.91) monitoring / reading are taken quarterly and recorded. There are no changes in the subsidence level as reported and recorded.	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>There is peat soil of 11.91 ha field no P13D situated in the Talisman Division Bukit Benut Estate. There is general guidelines for peat subsidence monitoring in the SOP ref STR-PNP-GRONOMY-01/2017-18. Among others showing the following;</p> <p>a) Subsidence of peat surface.</p> <p>b) The rate of peat subsidence gives indirect indication of generous gas emissions.</p> <p>c) Method to install peat subsidence pole and monitor peat subsidence.</p>	Complied
7.7.5	<p>(C) 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,</p>	There is peat soil of 11.91 ha field no P13D situated in the Talisman Division Bukit Benut Estate. Other SOP in relevant to the management of OP in peat soil is illustrated in STR-PNP-GRONOMY-01/2017-18. Among others showing the following;	Complied

	<p>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.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>d) Subsidence of peat surface.</p> <p>e) The rate of peat subsidence gives indirect indication of generous gas emissions.</p> <p>f) Method to install peat subsidence pole and monitor peat subsidence.</p> <p>g) Water management in peat soil.</p> <p>h) The OP planted in this field is 2013 at current 7 years old. Taking into consideration of 25 years retention of palm the next replanting is only scheduled in 18 years time. I.e 2038.</p>	
7.7.6	<p>(C) 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 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is peat soil of 11.91 ha field no P13D situated in the Talisman Division Bukit Benut Estate. Other SOP in relevant to the management of OP in peat soil is illustrated in STR-PNP-GRONOMY-01/2017-18. Among others showing the following;</p> <p>a) Subsidence of peat surface</p> <p>b) The rate of peat subsidence gives indirect indication of generous gas emissions.</p> <p>c) Method to install peat subsidence pole and monitor peat subsidence.</p>	Complied
7.7.7	<p>(C) 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 (2019) and associated audit guidance.</p>	<p>There is peat soil of 11.91 ha field no P13D situated in the Talisman Division Bukit Benut Estate. Other SOP in relevant to the management of OP in peat soil is illustrated in STR-PNP-GRONOMY-01/2017-18. Among others showing the following;</p> <p>Subsidence of peat surface</p> <p>a) The rate of peat subsidence gives indirect indication of</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>generous gas emissions.</p> <p>b) Method to install peat subsidence pole and monitor peat subsidence.</p> <p>c) Also observed there was no new drainage, road building and power lines by the estate peat soils at the peat soil field.</p>													
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>															
<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> <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> <p>- Minor compliance -</p>	<p>SOU 22 Mill /estates had established its Water Management Plan for year 2020 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <p>a) Implementation of rain water harvest,</p> <p>b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level.</p> <p>c) daily monitoring of bund / scheduled maintenance</p> <p>d) Establishment of <i>mucuna bracteata</i> to prevent erosion,</p> <p>e) Side drain at field road to control water, frond stacking,</p> <p>f) Enhancement of ground vegetation at bare ground area.</p> <p>The water sources are as shown below:</p> <table border="1" data-bbox="1137 1235 1921 1321"> <thead> <tr> <th data-bbox="1137 1235 1294 1321">Water sources</th> <th data-bbox="1294 1235 1431 1321">Usage</th> <th data-bbox="1431 1235 1594 1321">Monitoring & measurement</th> <th data-bbox="1594 1235 1688 1321">Freq</th> <th data-bbox="1688 1235 1769 1321">PIC</th> <th data-bbox="1769 1235 1921 1321">Review status</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Water sources	Usage	Monitoring & measurement	Freq	PIC	Review status							<p>Complied</p>
Water sources	Usage	Monitoring & measurement	Freq	PIC	Review status										

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		1	SAJ	Purchased for domestic consumption	Monitoring water supply	Monthly	AM Mgr	Liaison with Authority
		2	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	On-going	AM Mgr	Water harvesting for general washing
		3	Water tank	Emergency water supply	-	-	AM Mgr	Request water supply from other estates
The contingency plan during water shortage								
		1	Area/ incident	Action steps			PIC	Status
			Water shortage/ prolonged dry season	To obtain water from local authority /estate catchment To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP			Manager AM/Mill Engineer	As and when required

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		2	Severe water pollution/Contamination	<p>To obtain water from local authority To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP</p>	Manager AM//Mill Engineer	As and when required											
<p>The Estates had implemented water managements plans which covered:</p>																	
<ul style="list-style-type: none"> a) Water shortage contingencies b) Water pollution prevention c) Reduce wastage d) Identification & management of waste waters e) Monitoring rainfall f) Regular water quality analysis. 																	
<p>Water management plan reviewed annually. The management plan was sighted and verified. The water reduction plan is shown below;</p>																	
<table border="1"> <thead> <tr> <th data-bbox="1120 1165 1176 1212"></th> <th data-bbox="1176 1165 1344 1212">Issues/Areas</th> <th data-bbox="1344 1165 1668 1212">Action Steps</th> <th data-bbox="1668 1165 1803 1212">PIC</th> <th data-bbox="1803 1165 1937 1212">Status</th> </tr> </thead> <tbody> <tr> <td data-bbox="1120 1212 1176 1388">1</td> <td data-bbox="1176 1212 1344 1388">Rain water collection</td> <td data-bbox="1344 1212 1668 1388"> <p>Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery</p> </td> <td data-bbox="1668 1212 1803 1388">AM/Field staff</td> <td data-bbox="1803 1212 1937 1388">On-going</td> </tr> </tbody> </table>									Issues/Areas	Action Steps	PIC	Status	1	Rain water collection	<p>Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery</p>	AM/Field staff	On-going
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		2	Leakage on plumbing system	Frequent inspection to detect leakage Fix any leakage	AM/Field staff	On-going	
		3	Water compartmentalization	To conserve level of soil moisture To minimize water stress during dry season	AM/Field staff	On-going	
		4	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going	
		5	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going	
		5	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going	
		6	Water saving in nursery	To cease watering if rainfall recorded 8mm	AM/field staff	As necessary	
		The Mill Identification & Management of Waste Water					
			location	Waste water produced	Treatment/containment	Reuse/recycle/disposal method	
		1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system	
		2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain	
			Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	

		3	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain																			
		4	Lab	Cleaning water	Process drain	Monsoon drain																			
		5	Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.																			
7.8.2	<p>(C) 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) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</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 agrochemical 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="1189 1015 1816 1214"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSQM Unit with latest revision dated on 13/06/2011. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:</p>					No	River width	Buffer zone	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	Complied
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No	Estate	Buffer zone area
1	Bkt Benut	Sg Melantai
2	CEP Niyor	Nil
3	Lambak	Nil

	Estate	HCV area	Area	HCV
1	B Benut	River Reserve Sg Melantai	15.00	HCV 4
		Pond	4.20	HCV 4
		Water catchment area	4.42	HCV 4
2	Lambak	Pond	0.30	HCV 4
		Natural pond	1.97	HCV 4
		Water catchment area	0.39	HCV 4
3	C Niyor	Water catchment	6.11	HCV 4
		Total in SOU 2	32.94	

Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Extracted record of both the estates with details below;

Among others management plan taken:

- a) Regular inspection at buffer/HCV areas
- b) Monitor water from surrounding areas
- c) Track, measure and report all activities around river
- d) Train and educate workers.

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		<p>Water sampling was taken quarterly to test against the industrial effluent water analysis and pesticide analysis. Among others parameters as shown below:</p> <p>The sampling sites taken at Sg Melantai 4x/year as follows; There were no issues on the water quality for the sampling points for the sample taken in Jan and April 2020.</p> <table border="1" data-bbox="1205 647 1861 836"> <thead> <tr> <th></th> <th>parameter</th> <th>Standard</th> <th></th> <th>Parameter</th> <th>standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>6-9</td> <td>4</td> <td>SS</td> <td>50</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>3</td> <td>5</td> <td>AN</td> <td>0.3</td> </tr> <tr> <td>3</td> <td>COD</td> <td>25</td> <td>6</td> <td>DO</td> <td>5-7</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <table border="1" data-bbox="1205 879 1861 1114"> <thead> <tr> <th></th> <th>parameter</th> <th>Standard</th> <th></th> <th>Parameter</th> <th>standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Aldrin</td> <td>0.02 ppb</td> <td>5</td> <td>Heptachlor</td> <td>0.05 ppb</td> </tr> <tr> <td>2</td> <td>Dieldrin</td> <td>0.02 ppb</td> <td>6</td> <td>lindane</td> <td>2 ppb</td> </tr> <tr> <td>3</td> <td>t-DDT</td> <td>0.1 ppb</td> <td>7</td> <td>endosulfan</td> <td>10 ppb</td> </tr> <tr> <td>4</td> <td>BHC</td> <td>2 ppb</td> <td>8</td> <td>Chlordane</td> <td>0.08 ppb</td> </tr> </tbody> </table>		parameter	Standard		Parameter	standard	1	pH	6-9	4	SS	50	2	BOD	3	5	AN	0.3	3	COD	25	6	DO	5-7								parameter	Standard		Parameter	standard	1	Aldrin	0.02 ppb	5	Heptachlor	0.05 ppb	2	Dieldrin	0.02 ppb	6	lindane	2 ppb	3	t-DDT	0.1 ppb	7	endosulfan	10 ppb	4	BHC	2 ppb	8	Chlordane	0.08 ppb	
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7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -</p>	<p>Based on "<i>Compliance Schedule</i>" CPOM disposed effluent on watercourse (Sg Melantai) via land drainage in Bkt Benut Estate. Sighted quarterly report has been submitted to DOE by quarterly basis. Latest submission for to DOE on 16/3/2020 for period April to June 2020. Among others the indicators were:</p> <table border="1" data-bbox="1189 1331 1883 1375"> <thead> <tr> <th>No</th> <th>April-Dec 20</th> <th>STD</th> <th>21/4/20</th> <th>14/5/20</th> <th>11/6/20</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	No	April-Dec 20	STD	21/4/20	14/5/20	11/6/20							Complied																																																
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>The mill processing water are obtained from the SAJ and water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording detailed sampled (water usage per MT in 2019/20 of fresh fruit bunches (FFB) below;</p> <table border="1" data-bbox="1227 895 1839 1359"> <thead> <tr> <th>No</th> <th>Month</th> <th>Water</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jun</td> <td>19682</td> <td>9466</td> <td>2.08</td> </tr> <tr> <td>2</td> <td>July</td> <td>17110</td> <td>6932</td> <td>2.47</td> </tr> <tr> <td>3</td> <td>Aug</td> <td>17642</td> <td>10306</td> <td>1.71</td> </tr> <tr> <td>4</td> <td>Sep</td> <td>4397</td> <td>9545</td> <td>0.46</td> </tr> <tr> <td>5</td> <td>Oct</td> <td>18629</td> <td>9796</td> <td>1.90</td> </tr> <tr> <td>6</td> <td>Nov</td> <td>17175</td> <td>7592</td> <td>2.26</td> </tr> <tr> <td>7</td> <td>Dec</td> <td>17253</td> <td>8452</td> <td>2.04</td> </tr> <tr> <td>8</td> <td>Jan</td> <td>17091</td> <td>7155</td> <td>2.39</td> </tr> <tr> <td>9</td> <td>Feb</td> <td>17501</td> <td>9304</td> <td>1.88</td> </tr> </tbody> </table>	No	Month	Water	FFB /mt	Water /FFB	1	Jun	19682	9466	2.08	2	July	17110	6932	2.47	3	Aug	17642	10306	1.71	4	Sep	4397	9545	0.46	5	Oct	18629	9796	1.90	6	Nov	17175	7592	2.26	7	Dec	17253	8452	2.04	8	Jan	17091	7155	2.39	9	Feb	17501	9304	1.88	Complied
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Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised

7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2020. The document was reviewed/updated on Jan 2020. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</td> </tr> </tbody> </table>	No	Target	Objective	Action plan	1	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.	Complied
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3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources
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The utilization of fossil fuel in 2019/20 is being monitored with records shown below:

Site	<i>Bkt Benut Estate 2019/20</i>			<i>Lambak Estate 2019/20</i>		
	FFB mt	Diesel L	Diesel/FFB	FFB mt	Diesel L	Diesel /FFB
Jun	3466	5563	1.60	4588	6003	1.31
July	3436	5499	1.60	5244	7106	1.36
Aug	4351	5403	1.24	5306	5487	1.03
Sep	3701	4549	1.23	5293	5157	0.97
Oct	3634	5155	1.42	5219	4330	0.83
Nov	2774	4976	1.79	4179	5899	1.41
Dec	3718	4997	1.34	4507	5933	1.32
Jan	2507	4216	1.68	3870	5845	1.51
Feb	3362	4784	1.89	4884	6582	1.35
Mac	3735	2868	1.13	4940	5526	1.12
Apr	3985	2729	1.08	5021	4896	0.98
May	4248	3433	1.35	5183	5676	1.10

Site	<i>CEP Niyor Estate 2019/20</i>	<i>Bkt Benut Mill 2019/20</i>
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Mth	FFB mt	Diesel L	Diesel/ FFB	FFB mt	Diesel L	Diesel/ FFB
Jun	2071	3907	1.89	9466	120	0.02
July	2464	3733	1.51	6932	0	0
Aug	2413	4155	1.72	10306	0	0
Sep	2352	4755	2.02	9545	0	0
Oct	2284	5143	2.25	9796	124	0.02
Nov	1840	5155	2.80	7592	150	0.02
Dec	1736	4356	2.51	8452	0	0
Jan	1729	4108	2.37	7155	0	0
Feb	2528	4564	1.81	9304	0	0
Mac	2561	3733	1.46	9008	0	0
Apr	2458	3301	1.34	8865	120	0.01
May	2043	3435	1.68	9538	0	0

The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.

Performance variation in view of several factors i.e.

- a) Infrastructure of estates,
- b) Community size / no of gen-sets,
- c) No. of vehicles / age of machine.

		<p>d) Weather interference / crop production volume</p> <p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <p><i>Bkt Benut Mill and SOU22 Estates</i></p> <p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2019/20 identified in the following</p> <ul style="list-style-type: none"> a) Environmental Aspect Identification Summary FY 2020 reviewed accordingly. b) Environmental Impact Evaluation Summary FY 2020 reviewed accordingly. <p>Renewable energy usage & diesel consumption 2019/20 was established and monitored by monthly basis. Among others effort to reduce diesel usage includes the following;</p> <ul style="list-style-type: none"> a) By maintenance of the boiler & machinery to ensure at optimum level, b) to monitor diesel usage, <p>provide training to workers regarding reduce fuel and diesel usage for boiler.</p>	
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			

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<p>7.10.1</p>	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -</p>	<p>SOU 22 Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <p>a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment.</p> <p>b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.</p>	<p>Complied</p>																				
<p>7.10.2</p>	<p>(C) 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 minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -</p>	<p>SOU 22 has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1.</p> <p>Carbon stock assessment & projection of major GHG emission for new planting development report for SOU 22 was made in 23 Oct 2019 for the new planting area . Details as follows;</p> <table border="1" data-bbox="1160 965 1863 1157"> <thead> <tr> <th></th> <th>Field</th> <th>Ha</th> <th>Previous area</th> <th>Year of conversion</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>P95C1</td> <td>89.61</td> <td>Fallow area</td> <td>Jan 2021 replant</td> </tr> <tr> <td>2</td> <td>P01A1</td> <td>55.23</td> <td>Fallow area</td> <td>June 2020 reopen</td> </tr> <tr> <td></td> <td>Total</td> <td>144.84</td> <td></td> <td></td> </tr> </tbody> </table> <p>The fallow area of 144.84 ha consists of mixed land use types including oil cultivation. The areas assessed were previously planted with OP and abandoned due to Company policy to set aside area's above 23 degree. Following the latest IFSAR mapping to precisely identify the topography, it was learn that the large portion of land does not fall in the category of > 25 degree. The management has</p>		Field	Ha	Previous area	Year of conversion	1	P95C1	89.61	Fallow area	Jan 2021 replant	2	P01A1	55.23	Fallow area	June 2020 reopen		Total	144.84			<p>Complied</p>
	Field	Ha	Previous area	Year of conversion																			
1	P95C1	89.61	Fallow area	Jan 2021 replant																			
2	P01A1	55.23	Fallow area	June 2020 reopen																			
	Total	144.84																					

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		<p>decided to reopen these area for harvesting as well as replanting. An internal assessment using selected components of SEIA and HCV assessments since the total of land area is < 500 ha. The report among others covered the aspects of boundary, water resources, soil erosion, protection of sensitive area, waste management. There were no HCV areas within the situated with the affected areas. The SEIA been conducted in accordance to requirement of RSPO new planting procedure in effect on Jan 2016. the assessor concluded the following;</p> <ul style="list-style-type: none"> a) The project site is suitable for replant and reopen for operation b) There are no adverse social and environmental impacts from proposed development c) The finding of SEIA be further incorporated with the existing environmental and social management and monitoring plan. d) The effectiveness be evaluated monitored through regular management review. e) There are no HCV areas, other conversation set-aside, disturbed forest, tree/food crop identified for the new <p>The carbon stock estimation and land use classification analysis were conducted in accordance to the RSPO NPP 2015 and RSPO P & C 2018.</p> <p>include the following;</p> <ul style="list-style-type: none"> a) Land use classification analysis 	
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		<ul style="list-style-type: none"> b) Carbon stock estimation c) Identification & estimation of major potential sources GHG emission. d) Land use classification analysis LUCA e) Carbon stock value CSV <p>Based from the results of land use classification the total carbon stock value is estimated the assessor concluded that the carbon stock value is estimated to increase by 1655.74 tC from the current land use (shrub land, grassland and bare soil to oil planting. The total net GHG emission is -198 tCO_{2e}. the assessor concluded the following;</p> <ul style="list-style-type: none"> a) The 3 main sources of GHG emission are from the land clearing, fertilizer usage, POME treatment. b) Necessary plan to be developed, implemented and monitored to ensure reduction or minimal GHG emission. <p>The SEIA has also been conducted in accordance to requirement of the RSPO NPP 2015 under scenario new planting within an RSPO - certified management unit coming into effect Jan 2016.</p>	
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e.</p>	Complied

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(SM/5.2/EAI) and (SM/5.2/EIE) which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:

No	Environmental Receptors	Source
1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).
2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down
3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.

Bkt Benut Mill has conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS during the audit. The system was found to be in functional condition.

Data from the stack is connected online to DOE's office. Boiler smoke emission data are within the DOE limit.

		<p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> <p>'Pollution prevention plan and waste management action plan" – is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among of action has been taken by CU were:</p> <ul style="list-style-type: none"> a) Scheduled wastes – were disposed through Perniagaan Saudara Baru Sdn Bhd and Kualiti Alam Sdn Bhd (clinical waste). b) Domestic wastes are disposed at one estates landfill twice/thrice weekly at designated area located far from housing complexes and waterways in each estates in a 10 mt bin. c) Full compliance to zero burning practices. 	
<p>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</p>			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in SOU 22 and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS-SOP-SectionB2 - Under felling/clearing & land preparation b) Carbon Policy <p>SDP has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded,</p>	Complied

		windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.	
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	There is no fire used in preparation of existence or new planting in SOU 22 Estates	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	There is no fire used in preparation of existence or new planting in SOU 22 Estates	Complied
Criterion 7.12: 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	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	The audit findings have confirmed that the new planting (refer 7.3.1 to 7.4.2) have no effect to the present HCV and primary forest There were no HCV areas within the situated with the affected areas. The assessment concluded with recommendations that incorporated basic conservation planning principles for consideration into management regimes of preserving the HCV and conservation areas. The proposed management and monitoring for HCVA possible threats were also recorded.	Complied
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. 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	The audit findings have confirmed that the new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There were no HCV areas within the situated with the affected areas. The management commenced the project discussion on 08/11/2018 as sighted in the email chronology of events. Hence the current HCV assessment of the estates remains valid. The recent HCV assessment for the entire SOU 22 covering all the 3 estates and the mill was performed in Dec 2015 by the PSQM Methodology is through site observation, interviews, stakeholders consultation and	Complied

	<p>stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>	<p>desktop review on available secondary data. The assessment among others covers the following areas;</p> <p>a) Overview of HCV assessment. b) Description of assessment areas. c) Finding and discussion - landscape context - HCV criteria and application to agriculture d) HCV monitoring and management</p>	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable
7.12.4	<p>(C) 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). - Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 22 estates (refer 7.3.1 to 7.4.2). The recent HCV assessment for the entire SOU 22 covering all the 3 estates and the mill was performed in Dec 2015 by the PSQM personnel. Methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <p>a) Overview of HCV assessment. b) Description of assessment areas. c) Finding and discussion - landscape context - HCV criteria and application to agriculture d) HCV monitoring and management</p> <p>Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit.</p>	Complied

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		Sighting of RTE are made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation.	
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land 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. - Minor compliance -	There was no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird, presence of wild boar and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2020.	Complied
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 is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 22 estates (refer 7.3.1 to 7.4.2).	Complied
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. - Minor compliance -	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 22 estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any.	Complied

7.12.8	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 22 estates (refer 7.3.1 to 7.4.2).</p>	Complied
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Appendix B: Approved Time Bound Plan

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

Financial year (July – June)	Targeted	Achieved/Status	Attachments
Jun-08	5 SOUs	<p>Achievement of Timebound Plan Sime Darby Plantation Berhad has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets).</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 Berhad 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>For details please refer to Attachments:</p> <ul style="list-style-type: none"> i) Sime Darby Plantation Berhad - RSPO Certification Status for Malaysia Operations ii) Sime Darby Plantation Berhad- RSPO Certification Status for Indonesia Operations iii) Updates on PT MAS iii) RSPO SCCS status for Sime Darby Plantation Berhad (Downstream Operations)
2008/2009	20 SOUs (from Malaysia and Indonesia)	<p>Note: Time-bound plan to achieve 100% RSPO certification has shifted to 2015.</p>	
2009/2010	20 SOUs (from Malaysia and Indonesia)		
2010/2011 (End Dec 2011)	17 SOUs		

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

SDP - RSPO Certification for Time Bound Plan - Malaysia Operations (As at end Apr 2020)

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Sg. Dingin	Sungai Dingin Oil Mill	-	Karangan, Kedah	Certified	12/8/2011	
		Anak Kulim Estate	-		Certified		
		Sungai Dingin Estate	-		Certified		
		Somme Estate	-		Certified		
		Bukit Selarong Estate	-		Certified		
		Padang Buluh Estate	-		Certified		
		Bukit Hijau Estate	-		Certified		
		Jentayu Estate	-		Certified		
2	Chersonese	Chersonese Oil Mill	-	Kuala Kurau, Perak	Certified	5/10/2011	
		Chersonese Estate	-		Certified		
		Kalumpong Estate	-		Certified		
		Tali Ayer Estate	-		Certified		
		Holyrood Estate	-		Certified		

3	Elphil	Elphil Oil Mill	-	Sg Siput, Perak	Certified	18/6/2011	
		Kamuning Estate	-		Certified		
		Elphil Estate	-		Certified		
		Kinta Kellas Estate	-		Certified		
4	Flemington	Flemington Oil Mill	-	Teluk Intan, Perak	Certified	5/10/2011	
		Flemington Estate	-		Certified		
		Bagan Datoh Estate	-		Certified		
		Sabak Bernam Estate	-		Certified		
		Sg. Samak Estate	-		Certified		
5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan, Perak	Certified	3/3/2011	
		Selaba Oil Mill	-		Certified		
		Seri Intan (+ Selaba) Estate	-		Certified		
		Sabrang Estate	-		Certified		
		Sogomana Estate	-		Certified		
		Sg. Wangi Estate	-		Certified		
		Bikam Estate	-		Certified		
		Cluny (+ Bedford) Estate	-		Certified		
6	Tennamaram	Tennamaram Oil Mill	-	Bestari Jaya, Selangor	Certified	3/3/2011	
		Tennamaram Estate	-		Certified		

		Sungai Buluh Estate	-		Certified		
		Bukit Talang Estate	-		Certified		
7	Bkt Kerayong	Bukit Kerayong Oil Mill	-	Kapar, Selangor	Certified	15/4/2011	
		Bukit Kerayong Estate	-		Certified		
		Bukit Cheraka Estate	-		Certified		
		Elmina Estate	-		Certified		
8	East	East Oil Mill	-	Carey Island, Selangor	Certified	19/5/2011	
		East Estate	-		Certified		
		Sepang Estate	-		Certified		
		Dusun Durian Estate	-		Certified		
9	West	West Oil Mill	-	Carey Island, Selangor	Certified	19/5/2011	
		West Estate	-		Certified		
10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	7/7/2011	
		Bukit Puteri Estate	-		Certified		
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	7/7/2011	
		Kerdau Estate	-		Certified		
		Jentar Estate	-		Certified		
		Mentakab Estate	-		Certified		
		Chenor Estate	-		Certified		

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		Sg Mai Estate	-		Certified		
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	7/7/2011	
		Jabor Estate	-		Certified		
13	Labu	Labu Oil Mill	-	Nilai, Negeri Sembilan	Certified	30/12/2011	New Labu Estate has become a division of Labu Estate.
		Labu Estate	-		Certified		
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	19/5/2010	
		Tanah Merah Estate	-		Certified		
		Bukit Pelandok Estate	-		Certified		
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18/2/2014	Siliao Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong Estate	-		Certified		
		Sengkang Estate	-		Certified		
		Bradwall Estate	-		Certified		
		PD Lukut Estate	-		Certified		
		Tampin Linggi Estate	-		Certified		
		Sg. Bahru Estate	-		Certified		
		Salak Estate	-		Certified		
16	Kok Foh	Kok Foh Oil Mill	-	Bahau, Negeri Sembilan	Certified	7/7/2011	
		Muar River Estate	-		Certified		
		Sg. Senarut Estate	-		Certified		

		Sg. Gemas Estate	-		Certified		
		Kok Foh Estate	-		Certified		
		Bukit Pilah Estate	-		Certified		
		St. Helier Estate	-		Certified		
		Sungai Sabaling Estate	-		Certified		
		Pertang Estate	-		Certified		
17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	19/5/2010	
		Kempas Estate	-		Certified		
		Tangkah Estate	-		Certified		
		Kemuning Estate	-		Certified		
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	-	Jasin, Melaka	Certified	5/10/2011	
		Serkam Estate	-		Certified		
		Diamond Jubilee Estate	-		Certified		
		Bukit Asahan Estate	-		Certified		
19	Pagoh	Pagoh Oil Mill	-	Muar, Johor	Certified	28/1/2014	
		Pagoh Estate	-		Certified		
		Welch Estate	-		Certified		
		Lanadron Estate	-		Certified		

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		Pengkalan Bukit Estate	-		Certified		
20	Chaah	Chaah Oil Mill	-		Certified	18/11/2010	
		Chaah Estate	-		Certified		
		Sg. Simpang Kiri Estate	-		Certified		
		North Labis Estate	-		Certified		
21	Gunung Mas	Gunung Mas Oil Mill	-	Kluang, Johor	Certified	19/5/2010	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bkt Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
		Gunung Mas Estate	-		Certified		
		Kempas Klebang Estate	-		Certified		
		Bukit Paloh Estate	-		Certified		
		Yong Peng Estate	-		Certified		
22	Bukit Benut	Bukit Benut Oil Mill	-	Kluang, Johor	Certified	5/10/2011	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Niyor Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate	-		Certified		
		Lambak Elaeis Estate	-		Certified		
		CEP Niyor Estate	-		Certified		
23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-layang, Johor	Certified	11/4/2011	
		Ulu Remis Estate	-		Certified		
		Cenas Estate	-		Certified		
		Bukit Badak Estate	-		Certified		
		Tun Dr. Ismail Estate	-		Certified		

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		Pekan Estate	-		Certified		
		Sembrong Estate	-		Certified		
24	Hadapan	Hadapan Oil Mill	-	Layang-layang, Johor	Certified	29/3/2011	
		Sri Pulai Estate	-		Certified		
		Kulai Estate	-		Certified		
		Layang Estate	-		Certified		
		CEP Renggam Estate	-		Certified		
26	Sandakan Bay	Sandakan Bay	-	Sandakan, Sabah	Certified	1/10/2008	
		Tun Tan Siew Sin	-		Certified		
		Tunku Estate	-		Certified		
		Tigowis Estate	-		Certified		
		Sentosa Estate	-		Certified		
		Segaliud Estate	-		Certified		
27	Melalap	Melalap Oil Mill	-	Tenom, Sabah	Certified	21/1/2011	
		Melalap Estate	-		Certified		
		Sapong Estate	-		Certified		
28	Binuang	Binuang Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	
		Binuang Estate	-		Certified		
		Sungang Estate	-		Certified		

		Tingkeyu Estate	-		Certified		
		Jeleta Bumi Estate	-		Certified		
29	Giram	Giram Oil Mill	-	Kunak Sabah	Certified	16/1/2009	
		Giram Estate	-		Certified		
		Mostyn Estate	-		Certified		
30	Merotai	Merotai Oil Mill	-	Tawau, Sabah	Certified	16/1/2009	
		Merotai Estate	-		Certified		
		Imam Estate	-		Certified		
		Tiger Estate	-		Certified		
		Table Estate	-		Certified		
31	Lavang	Lavang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	
		Lavang Estate	-		Certified		
		Rasan Estate	-		Certified		
		Belian Estate	-		Certified		
		Kelida Estate	-		Certified		
		Lavang (Special) Estate	-		Certified		
		Pekaka Estate	-		Certified		
		Ruai Estate	-		Certified		
		Dulang Estate	-		Certified		

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		Charquest Estate	-		Certified		
		Paroh Estate	-		Certified		
32	Rajawali	Rajawali Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	
		Rajawali Estate	-		Certified		
		Samudera Estate	-		Certified		
		Semarak Estate	-		Certified		
		Bayu Estate	-		Certified		
33	Derawan	Derawan Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	
		Derawan Estate	-		Certified		
		Sahua Estate	-		Certified		
		Takau Estate	-		Certified		
		Damai Estate	-		Certified		
34	Pekaka	Pekaka Mill	-	Bintulu, Sarawak	Withdrawn	NA	Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang.
35	Bintang	Bintang Oil Mill	-	Johor	NA	NA	* SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for

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							Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
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1. SDP - RSPO Certification for Time Bound Plan - Indonesia Operations

As at end Apr 2020

No	Management Unit	Mill and Supply Base	Time Bound Plan	Latest Internal / External	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name			Audit Date				
1	PT Lahan Tani Sakti	Alur Dumai Mill	-		Rokan Hilir District – Riau	Certified	16/1/2012	
		Alur Dumai Estate	-			Certified		
2	PT Sajang Heulang	Mustika Mill	-		Tanah Bumbu District – South Kalimantan	Certified	3/7/2013	
		Mustika Estate	-			Certified		
		KKPA-2 PT.SHE Estate	-			Certified		
		KKPA-3 PT.SHE Estate	-			Certified		
		KKPA-5 PT.SHE Estate	-			Certified		
3	PT Ladangrumpun Suburabadi	Angsana Mill	-		Tanah Bumbu District – South Kalimantan	Certified	6/7/2011	PT LSI Plasma has been audited by the Certification Body in 2017. The identified legal issue on HGU is being address.
		Angsana Estate	-			Certified		
		Pantai Bonati Estate	-			Certified		
		Gunung Sari Estate	-			Certified		
		Subur Abadi Plasma 1 Estate	2020	Jul-19		Stage Two		

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		KKPA-1 PT.SHE Estate	-			Certified		
		KKPA-4 PT.SHE Estate	-			Certified		
		Bebunga Mill	-			Certified		
4	PT Langgeng Muaramakmur	Bebunga Estate	-		Kotabaru District – South Kalimantan	Certified	16/3/2012	Previously KKPA Sg. Cengal. Sime Darby Plantation does not have management control over the plasma scheme.
		Sungai Cengal Estate	-			Certified		
		Bakau Estate	-			Certified		
		KKPA LMR	2020			-		
5	PT Kridatama Lancar	Sukamandang Mill	-		Seruyan and East–Kotawaringin District Central Kalimantan	Certified	5/7/2011	
		Sukamandang Estate	-			Certified		
		Sapiri Estate	-			Certified		
		Barasdanum Estate	-			Certified		
		Kuala Kuayan Estate	-			Certified		
		Ladang Panjang Mill	-			Certified	9/7/2012	Only Division 3 (1200ha) was certified . Division 1 & 2 with 1792 Ha received HGU recently. The unit is getting ready for certification. Plan for certification in 2020.Total Ladang Panjang Estate is 2992 ha. Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan.
		Ladang Panjang Estate	-			Certified	9/7/2012	

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6	PT Bahari Gembira Ria	Plasma BGR Estate	2020	Nov-19	Muaro Jambi District - Jambi			Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR.
7	PT Tunggal Mitra Plantations	Manggala Mill	-		Rokan Hilir District – Riau	Certified	25/11/2010	
		Manggala 1 Estate	-			Certified		
		Manggala 2 Estate	-			Certified		
		Manggala 3 Estate	-			Certified		
8	PT Paripurna Swakarsa	Pondok Labu Mill	-		Kotabaru District – South Kalimantan	Certified	16/3/2012	
		Pondok Labu Estate	-			Certified		
		Binturung Estate	-			Certified		
		Rampa Estate	-			Certified		
		Sesulung Estate	-			Certified		
9	PT Bersama Sejahtera Sakti	Gunung Aru Mill	-		Kotabaru District – South Kalimantan	Certified	5/7/2011	
		Gunung Aru Estate	-			Certified		
		Gunung Kemasan Estate	-			Certified		
		Laut Timur Estate	-			Certified		
		Pantai Timur Estate	-			Certified		
		KKPA MBP	2020	Dec-19		-		
10	PT Guthrie Pecconina	Rantau Panjang Mill	-		Musi Banyuasin District – South Sumatera	Certified		
		Rantau Panjang Estate	-			Certified		

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		Bumi Ayu Estate	-			Certified	16/3/2012	Remarks: Land legalisation process for 4152.70 ha is still in process.
		Karang Ringin Estate	-			Certified		
		Napal Estate	-			Certified		
		Mangun Jaya Estate	-			Certified		
		Sungai Jernih Estate and GPI KKPA Estate	2020	Oct-19		-		Sungai Jernih Estate and the KKPA Estates(1-5) has undergone audit. Land legalisation process is still in process.
11	PT Laguna Mandiri	Rantau Mill	-		Kotabaru District – South Kalimantan	Certified	30/12/2011	
		Rantau Estate	-			Certified		
		Matalok Estate	-			Certified		
		Betung Mill	-			Certified	1/4/2014	
		Betung Estate	-			Certified		
		Sekayu Estate	-			Certified		
12	PT Indotruba Tengah	Sekunyir Mill	-		Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23/11/2010	
		Sekunyir	-			Certified		
		Seruyan Estate	-			Certified		
13	PT Swadaya Andika	Selabak Mill	-		Kotabaru District – South Kalimantan	Certified	16/3/2012	Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currebtly under PT Laguna Mandiri - Rantau Factory certification.
		Selabak Estate	-			Certified		
		Randi Estate	-			Certified		
		Sangkoh Estate	-			Certified		
		Lanting Estate	-			Certified		
14		Sungai Pinang Mill	-			Certified		

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	PT Bina Sains Cemerlang	Sungai Pinang Estate	-		Musi Rawas District – South Sumatera	Certified	11/9/2012	Remarks: Land legalisation process for 308.35 ha is still in process.	
		Bukit Pinang Estate	-			Certified			
15	PT Teguh Sempurna	Pemantang Mill	-		Seruyan and East	Certified	5/7/2011		
		Pemantang Estate	-		Kotawaringin District – Central Kalimantan	Certified			
		Kawan Batu Estate	-			Certified			
		Hatan Tiring Estate	-			Certified			
		Batang Garing Estate	-			Certified			
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill	-		Indra Giri Hilir District – Riau	Certified	11/10/2011		
		Teluk Bakau Estate	-			Certified			
		Nusa Lestari Estate	-			Certified			
		Nusa Perkasa Estate	-				Certified		1/4/2014
		Mandah Mill	-				Certified		
		Mandah Estate	-				Certified		
		Rotan Semelur Estate	-				Certified		
17	PT Aneka Intipersada	Teluk Siak Mill	-		Pekanbaru, Siak District – Riau	Certified	11/10/2011		
		Teluk Siak Estate	-			Certified			
		Pinang Sebatang Estate	-						Certified
		Aneka Persada Estate	-						Certified
18	PT Tamaco Graha Krida	Ungkaya Mill	-		Morowali District – Sulawesi Tengah	Certified	10/7/2012		
		Ungkaya Estate	-			Certified			
		Plasma TGK Estate	-	Mar-20			-		

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19	PT SIME Indo Agro	Bukit Ajong Mill	-		Sanggau District –West Kalimantan	Certified	18/10/2010	Land legalisation process for East Est for 5815.64 ha is still in process.	
		West Estate	-			Certified			
		East Estate	-			Certified			
		East* Estate /Sei Mawang Estate	2020	Jul-19		-			Land legalisation for Sei Mawang is still in process
		East Plasma Estate	-			Certified	18/7/2016		
		West Plasma Estate	-			Certified			
20	PT Padang Palma Permai / PT Perkasa Subur Sakti	Blang Simpo Mill	-		Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	3/5/2013		
		Tamiang (PT PPP) Estate	-			Certified			
		Batang Ara (PT PSK) Estate	-			Certified			
		Blang Simpo-01 Estate	-			Certified			
		Blang Simpo-02 Estate	-			Certified			
21	PT Sandika Natapalma	Lembiru Mill	-		Ketapang District – West Kalimantan	Certified	3/7/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.	
		Lembiru Estate	-			Certified			
		Awatan Estate	-			Certified			
		Karya Palma Estate	2020	Jul-19		-		Perijinan' process is ongoing	
		KKPA SNP Estate	2020	Jul-19		-		Perijinan' process is ongoing	
22	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-			Certified	3/7/2019		

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		Sungai Putih (PT BAL) Estate	2020	May-19		-		Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing
		Beturus (PT BAL) Estate	2020	May-19	Ketapang District – West Kalimantan	-		HGU obtained as per May 2018
		KKPA BAL Estate	2020	May-19		-		Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing
23	PT Mitral Austral Sejahtera	MAS Mill	NA	NA		Sanggau District – West Kalimantan	NA	NA
		MAS 1 Estate	NA	NA	NA			
		MAS 2 Estate	NA	NA	NA			
		MAS 4 Estate	NA	NA	NA			
		Plasma MAS Estate	NA	NA	NA			

Legends

Properties was sold.

Mill closed down/Mothballed

NA - NOT APPLICABLE

2. SDP - RSPO Certification for Time Bound Plan - NBPOL Operations

As at end Apr 2020

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	NA	Guadalcanal Province, Solomon Islands	Certified	18/3/2011	
		Tetere Estate					
		Ngalimbiu Estate					
		Mbalisuna Estate					
		Smallholders – West Zone (83)					
		Smallholders – Central Zone (53)					
		Smallholders – MBA East Zone (59)					
Smallholders – MBE East Zone (37)							
2	Milne Bay Estates (MBE)	Hagita Oil Mill	NA	Milne Bay Province, Papua New Guinea	Certified	15/2/2018	
		Giligili Estate					
		Hagita Estate					
		Waigani Estate					
		Sagarai Estate					

		Padipadi Estate				
		Mariawatte Estate				
		Smallholders - East Gurney Estate (264)				
		Smallholders - West Gurney Estate (229)				
		Smallholders - East Sagarai Estate (157)				
		Smallholders - West Sagarai Estate (221)				
3	Poliamba (POL)	Poliamba Oil Mill				
		Kara Estate				
		Nalik Estate				
		West Coast Estate				
		Noatsi Estate				
		Madak Estate				
		Smallholders -North Division (615)				
		Smallholders- South Division (868)				
		Smallholders -West Division (309)				
			New Ireland Province, Papua New Guinea	Certified	19/3/2012	

4	Ramu Agricultural Industries Ltd (RAIL)	Gusap Mill	NA	Morobe Province, Papua New Guinea	Certified	5/8/2010	
		Gusap East (Gusap) Estate					
		Gusap West (Paddock) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	NA	Oro Bay Province, Papua New Guinea	Certified	1/2/2013	
		Mamba Oil Mill					
		Embi Estate					
		Ambogo Estate					
		Sangara Estate					
		Sumbiripa Estate					
		Mamba Estate					

		Sambogo Estate Scheme Smallholder Sorovi Division(2019) Scheme Smallholder Saiho Division(842) Scheme Smallholder Aeka Division (911) Scheme Smallholder Igora Division (1367) Scheme Smallholder Ilimo Division (671)				
6	West New Britain (WNB)	Mosa Oil Mill Kumbango Oil Mill Kapiura Mill Numundo Mill Waraston Mill Bebere Estate Kumbango Estate Togulo Estate Dami Estate Waisisi Estate	NA	Kimbe, West New Britain, Papua New Guinea	certified Certified	10/9/2008

Kautu Estate
Karausu 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
Smallholders LSS Mosa (1822)

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		Smallholders VOP East (1817)					
		Smallholders VOP Central (1964)					
		Smallholders VOP West (1279)					
		Smallholders LSS Kapiura (551)					
		Smallholders VOP Kapiura (850)					
		Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20)					
		Erap Mill	Sep-20				
7	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd	Munum Estate	Sep-20	Markham Farms	Certified	27/3/2020	There is total area for NPP: 710.30 ha which is currently excluded from the certification scope until the NPP is approved.
		Maralumi Estate					
		Erap Estate					

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4. SDP - RSPO Certification for Time Bound Plan - Liberia Operations

As at end Jan 2020

No	Management Unit	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name					
1	Sime Darby Plantation(Liberia) Grand Cape Mount	Not Applicable – Property disposed	Grand Cape Mount County	Not yet Certified	NA	As at 16 /1/2020, 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). http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in [2019] for [Bukit Benut POM] and supply base was calculated using the PalmGHG Calculator version 4. 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 [Bukit Benut POM] and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.30
PKO	1.30

Extraction	%
OER	20.68
KER	5.26

Production	t/yr
FFB Process	104368.90
CPO Produced	23722.36
PKO Produced	6028.59

Land Use	Ha
OP Planted Area	24225.50
OP Planted on peat	11.91
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	24237.41

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	57038.43	0.55	6220.92	0.66	0.00	0.00	63259.35	0.61
CO ₂ Emission from fertilizer	6757.25	0.06	736.46	0.08	0.00	0.00	7493.71	0.07
NO ₂ Emission	3972.50	0.04	472.43	0.05	0.00	0.00	4444.93	0.04
Fuel Consumption	522.82	0.01	42.41	0.00	0.00	0.00	565.23	0.01
Peat Oxidation	84.42	0.00	0.00	0.00	0.00	0.00	84.42	0.00
Sink								
Crop Sequestration	-54064.89	-0.52	-5816.24	-0.61	0.00	0.00	-59881.13	-0.57
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	14310.54	0.14	1655.98	0.17	0.00	0.00	16135.49	0.15

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**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	22482.53	0.20
Fuel Consumption	2.45	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	22484.98	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100.00

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Aug 2019	10417.74	-	10417.74
2	Sept 2019	9572.17	-	9572.17
3	Oct 2019	9779.44	-	9779.44
4	Nov 2019	7510.69	-	7510.69
5	Dec 2019	8512.24	-	8512.24
6	Jan 2020	7237.32	-	7237.32
7	Feb 2020	9205.43	-	9205.43
8	Mar 2020	9087.09	-	9087.09
9	Apr 2020	9006.1	-	9006.1
10	May 2020	9516.75	-	9516.75
11	Jun 2020	12936.21	-	12936.21
	Total	102781.18	-	102781.18
Note:				

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Aug 2019	2,169.58	541.17
2	Sept 2019	1,956.55	510.34
3	Oct 2019	1,878.36	518.05
4	Nov 2019	1,572.43	391.70
5	Dec 2019	1,719.77	410.87
6	Jan 2020	1,467.88	335.97
7	Feb 2020	1,990.02	473.07
8	Mar 2020	1,956.15	463.30
9	Apr 2020	1,842.07	439.02
10	May 2020	1,947.73	441.06
11	Jun 2020	2,579.88	552.84
		21080.42	5077.39
Note:			

C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)

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No.	Buyers Name	Palmtree Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Buyer A	TR-77b84f87-5a4e TR-0af15a0e-faf3 TR-e21afbd7-d71c	900.6	
2	Buyer A	TR-6fc325b7-7964 TR-7cd4be35-24c8 TR-034e7b90-d25e TR-4409189c-618e TR-530c541f-4004 TR-6827d2eb-4240	2,148.76	
3	Buyer A	TR-0e2fb554-8ded TR-9451edfa-f446 TR-6621d2c3-ef30	510	
4	Buyer B	TR-fb36c759-9b2a TR-150c300a-36ce TR-a6e9c1b2-c432 TR-add8fa53-4404 TR-37713fc1-514d TR-fff44447-b186 TR-26254123-25c9 TR-47db0556-0be0 TR-1ae9b250-5e67 TR-811d00e9-9885 TR-8b5f14b6-16ec TR-404445b8-7e1d TR-f89b7ce3-15a3 TR-2e352ca8-306b TR-8541e56c-e4cd TR-18731220-113b TR-9b2bd98a-e45d TR-66353d37-6cda 5TR-e813df89-1162 6TR-2ec06073-dfc8 T7R-83444fce-6d52 T8R-3cf768f1-bc80 TR-bea2edd6-9415 TR-d18f66f9-0b36 TR-f2716d4e-1f39 TR-83d62976-d213 TR-6f64aa3f-ba78	926.03	
5	Buyer B	TR-582c4b4b-8fc9 TR-c97ca6a6-a33f TR-bce8fc9e-c2f9	663.62	

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		TR-5d51cdc4-1a33 TR-7630d53d-12c3 TR-7df0f2c5-7cb2 TR-9c53bcee-31e5 TR-a9b7d28f-010c TR-377f9969-ea32 TR-25b4b01b-97e0 TR-badffd97-4346 TR-856dd006-0141 TR-2010ea99-74f3 TR-d9a1a03e-ab57 TR-11b0fe48-8fd4 TR-4bcc67e6-7d6a TR-d0f32987-58f4 TR-a9073bdb-fa41		
6	Buyer B	TR-eda7dee2-c820 TR-0f22c424-c5d0 TR-9cfcf109-9791 TR-a9ddb8eb8-8e32 TR-093199ca-10cf TR-524ad084-96a8 TR-a3c7646c-094a TR-dffb62d3-3e91 TR-6945a066-72be TR-604c082d-a4bb TR-60fc9a75-b28a	4,156.1	
7	Buyer C	TR-bb5bd409-ccb8		200
8	Buyer B	TR-f558d47c-51a1 TR-120ea7de-f540 TR-c228e7b7-1fea TR-476bed10-e9fd TR-8c2df4d9-b118	1747	
9	Buyer B	TR-23d237ba-73f8 TR-b97938e7-2d99 TR-786b6f89-fc6c TR-babd4807-631b TR-ded19bb8-a811 TR-3ca005db-f732 TR-b4f477e6-0e13 TR-bd755ae8-0e2d	1,943.46	
10	Buyer B	TR-5e5281f9-02de TR-b5ae05db-c7af TR-08944d1b-2bf3 TR-564df608-4117 TR-ee9850b2-e70e TR-442b0f1b-7f0f	1,099.11	
Total			14,094.68	200
Note:				

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D. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	N/A			
Note:				

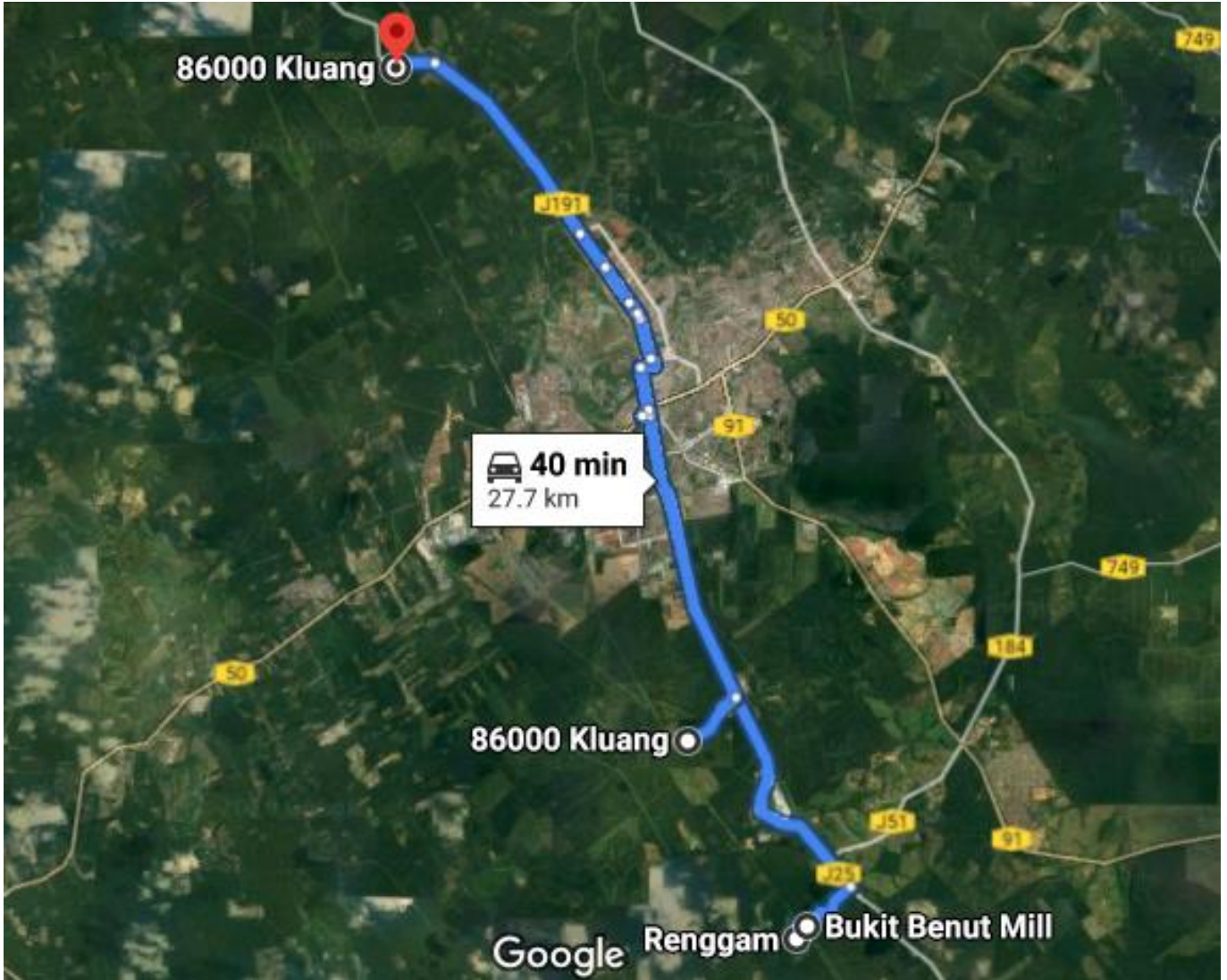
E. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	Buyer A	121.49		
2	Buyer B	39.76		
3	Buyer C		79.02	
4	Buyer D		75.61	
5	Buyer E		78.72	
6	Buyer F		76.18	
7	Buyer G		147.45	
8	Buyer H		98.41	
9	Buyer I		15.63	
10	Buyer J		76.40	
11	Buyer K		37.22	
12	Buyer L		15.65	
13	Buyer M		37.95	
14	Buyer N		37.71	
15	Buyer O		14.42	
16	Buyer P	189.01		
17	Buyer Q		116.95	
18	Buyer R		64.07	
19	Buyer S		46.40	
20	Buyer T	548.58		
21	Buyer U		279.22	
22	Buyer V		74.55	
23	Buyer W		53.49	

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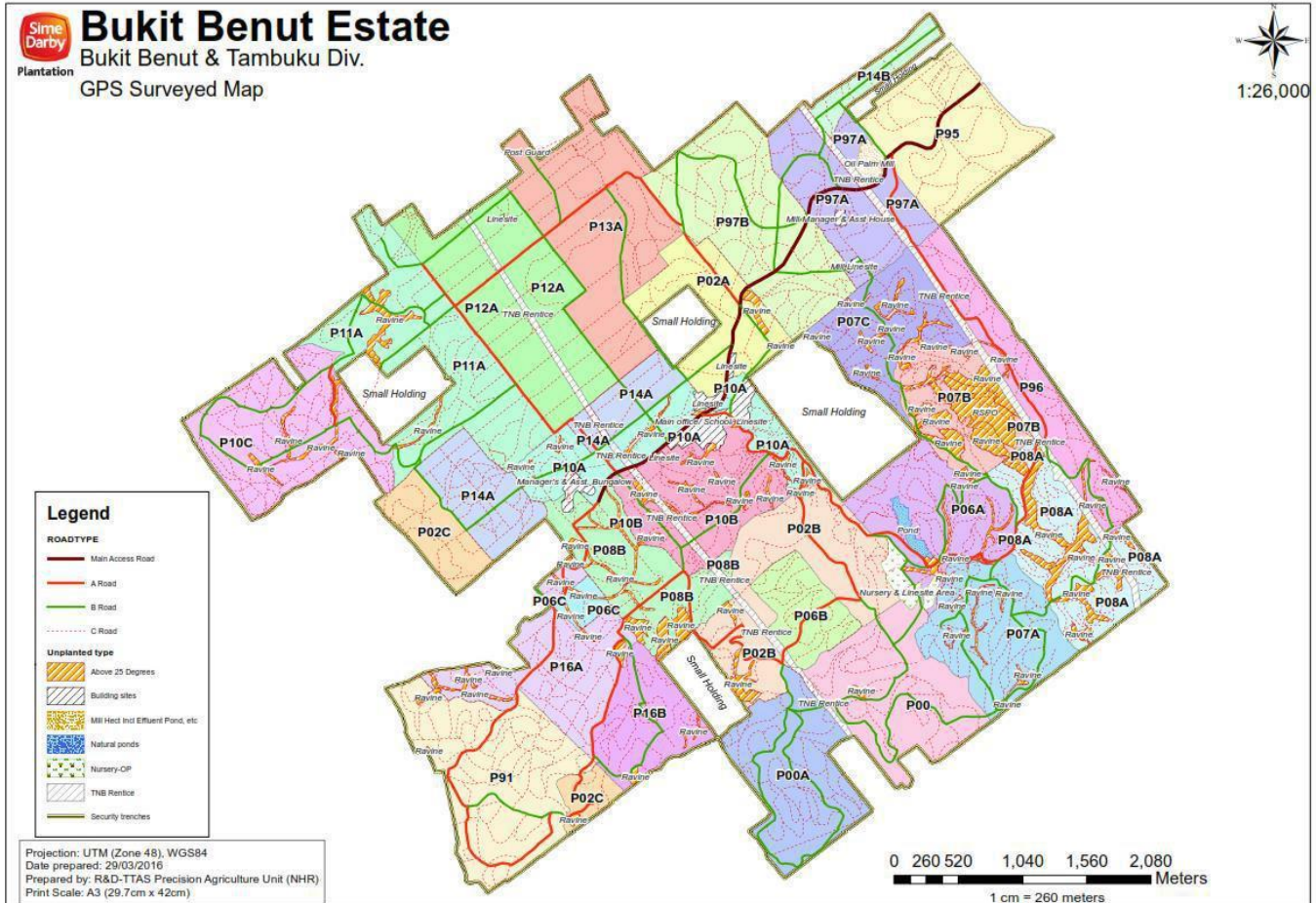
24	Buyer X		37.90
25	Buyer Y		39.60
26	Buyer Z		141.83
27	Buyer AA		146.75
28	Buyer BB		15.76
29	Buyer CC		78.23
30	Buyer DD		99.12
31	Buyer EE		36.91
32	Buyer FF		108.29
Total		898.84	2,129.44
Note:			

F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	N/A		
Note:			

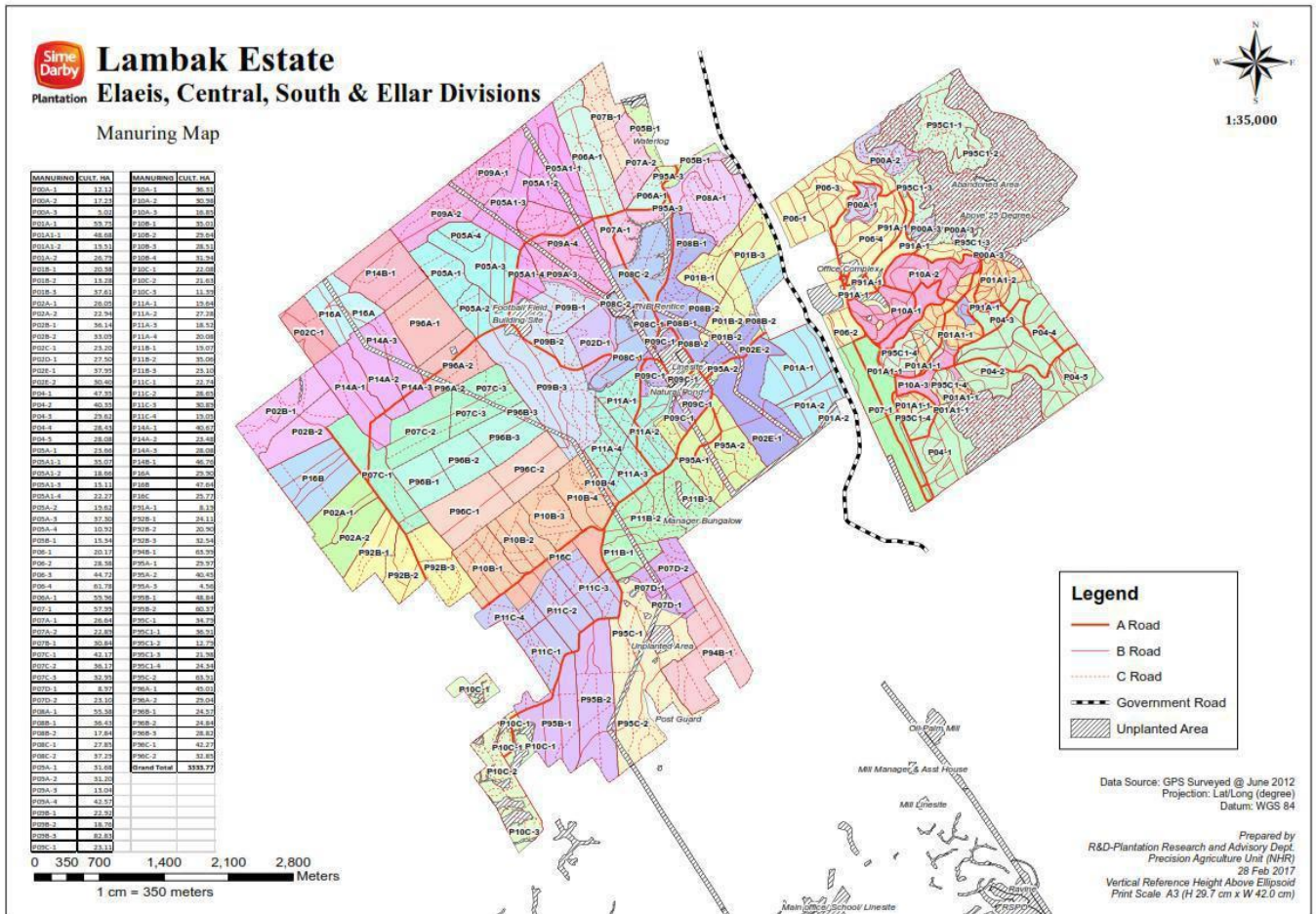
Appendix E: Location Map of Certification Unit and Supply bases

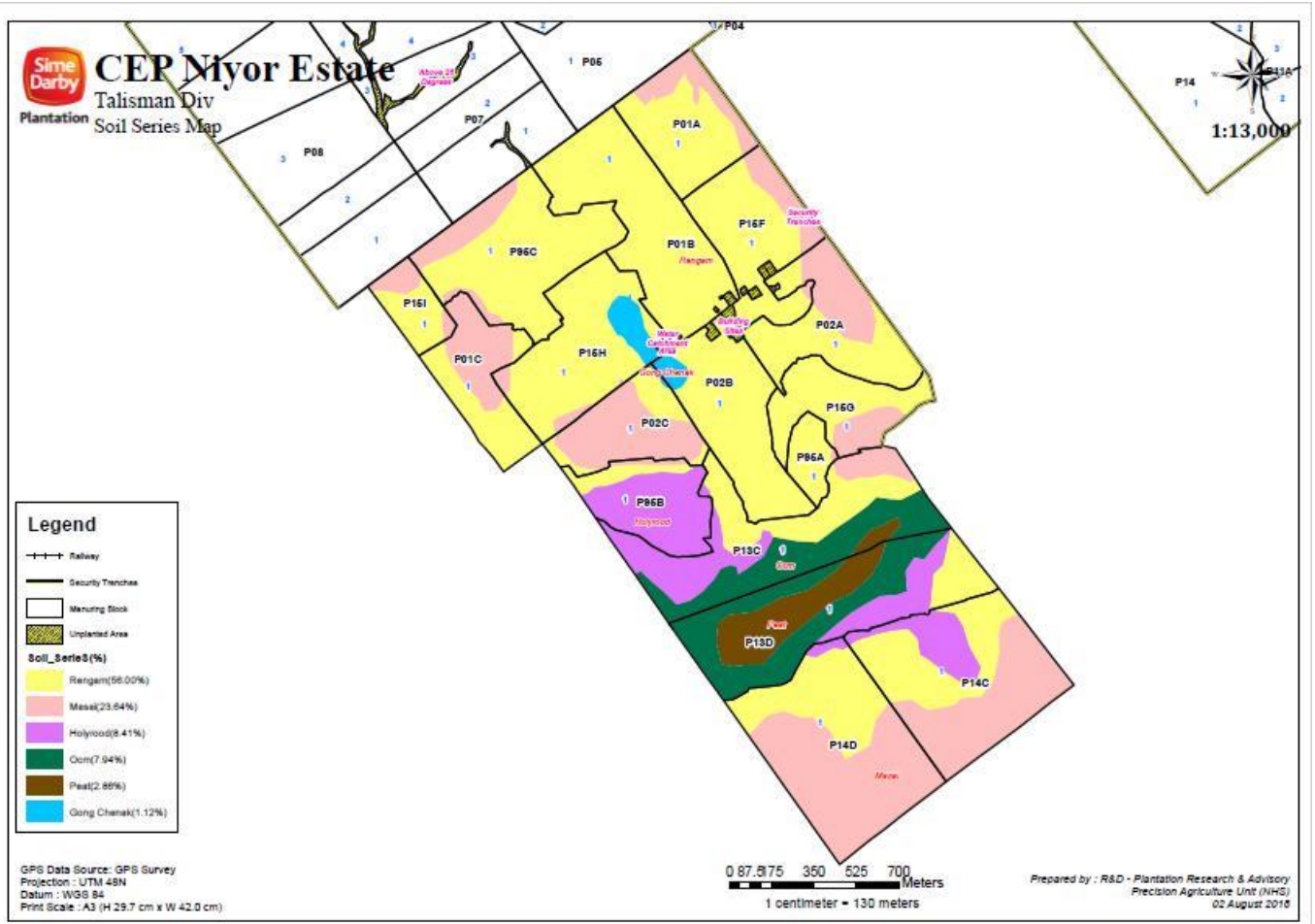


Appendix F: Estate Field Map



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Appendix G: List of Smallholder Sampled

N/A

Appendix H: 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
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
SIA	Social Impact Assessment
SOP	Standard Operating Procedure