

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment** (Choose an item.)
- Recertification Assessment (RA 2)**
- Extension of Scope**

Client Company name (Parent Company): Sime Darby Plantation Berhad
Client company Address: Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7, Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 3) Elphil Palm Oil Mill and Supply Base
Location of Certification Unit: Batu 6, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia
Date of Final Report: 10/6/2021

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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 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7, Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 3) - Elphil Palm Oil Mill		
Location / Address	Batu 6, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM)	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	+603-78484379 (Head Office)	Facsimile	+603 78484363 (Head Office)

2. Certification Information			
Certificate Number	RSPO 550180	Date of First Certification	18/06/2011
		Certificate Start Date	18/06/2021
		Certificate Expiry Date	17/06/2026
Scope of Certification	Palm Oil and Palm Kernel Production		
Visit Objectives	The objective of the assessment is to conduct a re-certification assessment to ensure the elements of the scope of registration and the requirements of the management standard are effectively addressed by SOU 3 Elphil POM and Supply Base's management system and the ability of the management system to ensure the organisation meets applicable statutory, regulatory and contractual requirements and as applicable, to identify areas for potential improvement of the management system.		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <input type="checkbox"/> Annual Surveillance Assessment (RA Choose an item. ; ASA Choose an item.) <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		
Supply Chain Module	<input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 705883	MSPO 2530-3:2013 (MSPO Part 3 :General Principles For Oil Palm Plantations And Organized Smallholders)	BSI Services Malaysia Sdn Bhd	24/03/2023
MSPO 705885	MSPO 2530-4:2013 (MSPO Part 4 :General Principles For Palm Oil Mill)		24/03/2023
MSPO 717672	MSPO SCC:2018		11/11/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Elphil Palm Oil Mill	Batu 6, Jalan Lintang, Sungai Siput Utara, 31100 Sungai Siput, Perak, Malaysia	4° 53' 24.90" N	101° 5' 38.00" E
Elphil Estate	Ladang Elphil, Jalan Lintang, 31100 Sungai Siput (U) Perak, Malaysia	4° 53' 24.90" N	101° 5' 38.00" E
Kamuning Estate	Ladang Kamuning/Changkat Salak, 31100 Sungai Siput (U), Perak, Malaysia	4° 49' 34.80" N	101° 3' 43.70" E
Kinta Kellas Estate	Ladang Kinta Kellas, 31007 Batu Gajah, Perak, Malaysia	4° 27' 46.15" N	101° 4' 30.72" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Elphil Estate	1,661.98	26.53	176.92	1,865.43	89.10
Kamuning Estate	2,638.19	84.59	1,165.65	3,888.43	67.85
Kinta Kellas Estate	956.34	3.69	100.71	1,060.74	90.16
Total	5,256.51	114.81	1,443.28	6,814.60	77.14

Remarks:

- 1) Elphil Estate : Based on measure conducted by Land Management Department on 2019 found that total area of Estate 1,865.43 ha and reduction 31.58 ha at Infrastructure & Other.
- 2) Kinta Kellas Estate : Based on measure conducted by GPS team and emailed from Precision Agriculture Unit on May 2020 found that the total planted hectarage is 956.34 ha and total area 1,060.74 ha.

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- 3) Kamuning Estate : Reduction 936.27 ha at Infrastructure & Other due field transfer to Elphil Estate since 2009. Reduction 19.28 ha due land acquisition for project Landasan Berkembar Electric (Ipoh-Padang Besar) from 2008 to 2010.

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Elphil Estate	218.63	442.04	88.13	894.08	19.10	1,443.35	218.63
Kamuning Estate	337.00	807.00	1,182.19	312.00	-	2,301.19	337.00
Kinta Kellas Estate	59.61	367.80	-	528.93	-	896.73	59.61
Total (ha)	615.24	1,616.84	1,270.32	1,735.01	19.10	4,641.27	615.24

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Jun 20 – May 21)	Actual (Mar 20 – Feb 21)		Forecast (Jun 21 – May 22)
		Previous license period (Mar 20 – May 20)	Current license period (Jun 20 – Feb 21)	
Elphil Estate	35,000.00	8,169.41	19,488.04	30,145.00
Kamuning Estate	45,000.00	9,601.49	27,033.37	43,376.00
Kinta Kellas Estate	23,000.00	4,939.94	15,318.22	21,119.55
Total	103,000.00		84,550.47	94,640.55

8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			
	Estimated (Jun 20 – May 21)	Actual (Mar 20 – Feb 21)		Forecast (Jun 21 – May 22)
		Previous license period (Mar 20 – May 20)	Current license period (Jun 20 – Feb 21)	
	N/A			N/A
Sogomana		-	326.08	
Sungai Wangi		-	195.41	
Total		-	521.49	

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9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated (<i>Jun 20 – May 21</i>)	Actual (<i>Mar 20 – Feb 21</i>)		Forecast (<i>Jun 21 – May 22</i>)
		<i>Previous license period</i> (Mar 20 – May 20)	<i>Current license period</i> (Jun 20 – Feb 21)	
Tang Tatt	N/A	18,097.36	60,388.72	N/A
Eng Huat		8,123.61	19,614.93	
Felcra Kg Jasa		115.48	381.37	
Felcra Sungai Siput		61.80	231.92	
NLFCS Sungai Siput		-	170.44	
NLFCS Sungei Krudda		-	90.26	
Total			107,275.89	

10. Certified Tonnage				
	Estimated (<i>Jun 20 – May 21</i>)	Actual (<i>Mar 20 – Feb 21</i>)		Forecast (<i>Jun 21 – May 22</i>)
	FFB	FFB		FFB
		<i>Previous license period</i> (Mar 20 – May 20)	<i>Current license period</i> (Jun 20 – Feb 21)	
Mill Capacity: 45 MT/hr	103,000.00	22,710.84	62,361.12	94,640.55
		85,071.96		
	CPO (OER: 20.49 %)	CPO (OER: 21.12 %)		CPO (OER: 20.60 %)
	21,104.70	4,541.22	13,423.38	19,495.95
		17,964.60		
	PK (KER 5.50 %)	PK (KER: 5.36 %)		PK (KER: 5.50 %)
	5,665.00	1,176.17	3,387.50	5,205.23
		4,563.67		

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11. Actual Sold Volume (CPO)					
Current License period (Jun 20 – Feb 21)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	176.98	-	-	13,004.31	13,181.29
Previous License period (Mar 20 – May 20)					
CPO (MT)	-	-	-	4,719.42	4,719.42
Total	176.98	-	-	17,723.73	17,900.71
Remark: Opening Stock as of June 2020: 217.27 MT					

12. Actual Sold Volume (PK)					
Current License period (Jun 20 – Feb 21)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	967.10	-	-	2,221.50	3,188.60
Previous License period (Mar 20 – May 20)					
PK (MT)	-	-	-	1,367.05	1,367.05
Total	967.10	-	-	3,588.55	4,555.65
Remark: Opening Stock as of June 2020: 133.00 MT					

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

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)
Website: www.bsigroup.com

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 16 – 19/03/2021 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 Critical NC close out off-site due to the risk is low.

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. Malaysia National Interpretation 2019 for RSPO P&C 2018 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.

Public notification of stakeholder consultation was made on 04/02/2021 in both RSPO and BSI's website. 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

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of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Elphil Palm Oil Mill	√	√	√	√	√
Elphil Estate	√	√	√	√	√
Kamuning Estate	√	√	√	√	√
Kinta Kellas Estate	√	√	√	√	√

Tentative Date of Next Visit: March 1, 2022 - March 4, 2022

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>
Hu Ning Shing	Team Leader	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She attended Endorsed MSPO Auditor and MSPO SCCS Lead Auditor Course in 2019. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social, legal, workers & stakeholders consultation and SCC for CPO mill. She is fluent in Bahasa Malaysia and English languages.

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Muhammad Fadzli Masran	Team Member	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 mill and estate best practices, waste management, HCV, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.
Valence Shem	Team Member	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.

Accompanying Persons:

Name	Role
N/A	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	HNS	VS	MFM
Monday 15/03/2021	PM	Auditors travel to MH Hotel, Ipoh	√	√	√
Tuesday 16/03/2021	0830 - 0900	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). • Verification on previous audit findings 	√	√	√

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Date	Time	Subjects	HNS	VS	MFM
Elphil Palm Oil Mill	0900 - 1200	Elphil Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.	√	√	√
	1200 - 1300	Lunch	√	√	√
	1300 - 1630	Elphil Palm Oil Mill Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. RSPO Supply Chain Site visit: Incoming of FFB and outgoing of CSPO & CSPK – weighbridge, ramp, storage area, loading bays, etc. Documentation review: RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√
	1630 - 1730	Interim Closing Briefing	√	√	√
Wednesday 17/03/2021 Elphil Estate	0830 - 1200	Elphil Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1000 – 1100	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1200 – 1300	Lunch	√	√	√
	1300 - 1630	Elphil Estate 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).	√	√	√
	1630 - 1730	Interim Closing Briefing	√	√	√
Thursday 18/03/2021 Kamuning Estate	0830 - 1200	Kamuning Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1200 – 1300	Lunch	√	√	√

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Date	Time	Subjects	HNS	VS	MFM
	1300 - 1630	Kamuning Estate 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).	√	√	√
	1630 - 1730	Interim Closing Briefing	√	√	√
Friday 19/03/2021 Kinta Kellas Estate	0830 - 1200	Kinta Kellas Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1200 – 1300	Lunch	√	√	√
	1300 - 1600	Kinta Kellas Estate 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).	√	√	√
	1600 – 1630	Verify any outstanding issues & Preparation for closing Meeting	√	√	√
	1630 - 1730	Closing Meeting	√	√	√

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?	<p>Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations.</p>	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	<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, 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 Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.</p>	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition.	No. There is no new acquisitions as at latest TBP 2021.	Yes

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<p>Certification plan for the new acquisition shall be available.</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.</p> <p>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 SDP have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019. Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.</p> <p>Malaysia - Pekaka Mill is being mothballed (at the time of SDP 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: 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 Bintang Oil Mill is being put on hold. As at 1st Oct 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 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): 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:</p>	<p>Yes</p>

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	https://www.rspo.org/members/29/Sime-Darby-Plantation-Berhad .	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There are no lapses in implementation of the plan.	Yes
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	There were no failures to proceed with implementation of the plan. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above.	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <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. 	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).	Yes
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings. As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations .	Yes
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.	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above. Refer to the RaCP Tracker for details of RaCP-0356. https://www.rspo.org/certification/remediation-and-compensation/racp-tracker#growerTracker . Total 21 management units with potential liability and total 21 LUCA has been submitted. 7 out of 21 LUCA has been completed. 8 management units have submitted for compensation plan and 14 management units are required to submit for remediation plan.	Yes
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.	Yes
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	None noted. No stakeholder comments or complaints received.	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance	Yes. The sustainability unit has conducted the internal audit for 9 units and updated in the compliance status of uncertified management unit.	Yes

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statement shall be available.	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.	
Have there been any stakeholder (including NGO) consultation conducted?	None noted. No stakeholder comments or complaints received.	Yes

3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? 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.	No scheme smallholder under SOU 3 Elphil POM.	N/A

3.4 Details of Nonconformities

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

During this Assessment there were one (1) Critical and two (2) Minor nonconformities raised. The SOU 3 Elphil Palm Oil Mill and Supply Bases 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 its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2033660-202103-M1	Clause & Category (Critical / Minor)	7.10.1 Critical
Date Issued	19/03/2021	Due Date	16/06/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	18/05/2021

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Statement of Nonconformity:	One type of fertiliser application at the field were not reported in the Palm GHG calculator.
Requirement Reference:	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.
Objective Evidence:	Based on the estate’s accounting system (SAP) at Kinta Kellas Estate, one type of fertiliser i.e. NK1 (417.85 mt) applied in the year 2020, was not included in the RSPO PalmGHG Calculator version 4.
Corrections:	Immediately check and informed PIC of RSPO Palm GHG to include fertilizers which contrary with estate system.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Monitoring & tracking on RSPO Palm GHG calculator not effective. 2. Lack of communication with PIC of RSPO Palm GHG.
Corrective Actions:	Estate management has appointed PIC to look after the RSPO Palm GHG Calculator and will monitored monthly basis & to communicate with PIC if there is any contrary with the system.
Assessment Conclusion:	<p>The following evidence were verified:</p> <ol style="list-style-type: none"> 1) The corrected RSPO Palm GHG calculator that shows the NK1 fertiliser has been included in the calculation. 2) A copy of an appointment letter dated 06/04/2021 that shows a PIC to look after the RSPO Palm GHG Calculator has been appointed by the Estate Manager. <p>The evidence was found to be adequate to close the NCR. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.</p>

Non-conformity			
NCR Ref #	2033660-202103-N1	Clause & Category (Critical / Minor)	2.2.2 Minor
Date Issued	19/03/2021	Due Date	Next surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	N/A
Statement of Nonconformity:	Evidence of legal due diligence of contractors was not available.		
Requirement Reference:	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.		
Objective Evidence:	<p><u>Kamuning Estate:</u> There was engagement of contractor, Meel Enterprise Sdn Bhd (pruning activity) in the estate and the contractor has employed 4 Bangladesh workers. No evidence to show that due diligence of contractor is available as below:</p> <ol style="list-style-type: none"> 1. Payslips were not available for the workers during the time of audit. 		

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	<p>2. Permit for worker (Passport No.: BM 0701628) was registered under employer of Multi Global Enterprise but employment contract was signed with Meel Enterprise Sdn Bhd.</p> <p>3. Permit for the other 3 workers were not available during the audit.</p> <p>4. Employee Injury Scheme of SOCSO contribution was not available during the time of audit.</p> <p><u>Kinta Kellas Estate:</u> The contractor, Gunasekaran (FFB transporter) has employed 4 permanent lorry drivers in the estate. The workers have signed on Daftar Pekerja where it only contains total income, deduction (advance, EPF contribution, SOCSO contribution, EIS contribution), nett income and signature of the workers. However, there is no details of wages and allowances earned during the wage period, details of holidays, annual and sick leave with pay granted and date of payment as per Employment Regulation 1957 detailed out in the payslip. The sampled workers as below:</p> <ol style="list-style-type: none"> 1. I/C No.: 770817-08-50XX 2. I/C No.: 680503-08-58XX 3. I/C No.: 690127-08-54XX 4. I/C No.: 790907-08-65XX <p>Besides, reviewed the Daily Oil Mill Declared Weight – By Delivery Note for December 2020 and February 2021 found that the workers were not paid twice his ordinary rate per piece for work on rest day (Sunday). This has confirmed by the contractor during the interview. The date of work on rest day as below:</p> <table border="1" data-bbox="523 1128 1469 1473"> <thead> <tr> <th>I/C No.</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>770817-08-50XX</td> <td>13/12/2021, 07/02/2021, 14/02/2021, 21/02/2021</td> </tr> <tr> <td>680503-08-58XX</td> <td>13/12/2020, 27/12/2020, 07/02/2021, 14/02/2021, 21/02/2021</td> </tr> <tr> <td>690127-08-54XX</td> <td>13/12/2020</td> </tr> <tr> <td>790907-08-65XX</td> <td>13/12/2020, 27/12/2020, 07/02/2021, 21/02/2021</td> </tr> </tbody> </table>	I/C No.	Date	770817-08-50XX	13/12/2021, 07/02/2021, 14/02/2021, 21/02/2021	680503-08-58XX	13/12/2020, 27/12/2020, 07/02/2021, 14/02/2021, 21/02/2021	690127-08-54XX	13/12/2020	790907-08-65XX	13/12/2020, 27/12/2020, 07/02/2021, 21/02/2021
I/C No.	Date										
770817-08-50XX	13/12/2021, 07/02/2021, 14/02/2021, 21/02/2021										
680503-08-58XX	13/12/2020, 27/12/2020, 07/02/2021, 14/02/2021, 21/02/2021										
690127-08-54XX	13/12/2020										
790907-08-65XX	13/12/2020, 27/12/2020, 07/02/2021, 21/02/2021										
<p>Corrections:</p>	<p><u>Kamuning Estate:</u> Informed to contractor Meel Enterprise Sdn Bhd and immediately stopped those worker who registered under employer of Multi Global Enterprise. Also required to submit workers permit & SOCSO contribution proof immediately.</p> <p><u>Kinta Kellas Estate:</u></p> <ol style="list-style-type: none"> 1. The contractor will pay the missed payment on rest day, wages on holidays and sick leave to his respective employees immediately. 2. The contractor will make workers contract agreement contains details of wages, allowances earned during the wage period, details of holidays, annual and sick leave with pay granted and date of payment as per Employment Regulation 1957 detailed out in the payslip. 										
<p>Root Cause Analysis:</p>	<ol style="list-style-type: none"> 1. Monitoring on contract workers documentation not effective at Kamuning & Kinta Kellas Estate. 2. There is no responsible person in charge to monitor documentation of legal 										

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	due diligence of contractors.
Corrective Actions:	<ol style="list-style-type: none"> Estate management together with RSQM department will conduct a briefing on Employment Regulation 1957 to all the contractor. Estate management has appointed PIC (Assistant manager & CC) to monitor contract workers documentation. Appointed PIC will ensure hired contract & their workers should comply with Employment Regulation 1957 and Akta Keselamatan Sosial Pekerja 1969 and documented. The legal due diligence of contractors documents will be put on the list for monitoring and tracking on monthly basis.
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Implementation of the corrective action plan will be verified during next assessment.

Non-conformity			
NCR Ref #	2033660-202103-N2	Clause & Category (Critical / Minor)	3.4.2 Minor
Date Issued	19/03/2021	Due Date	Next surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	N/A
Statement of Nonconformity:	The social management plan has not completed comprehensively.		
Requirement Reference:	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.		
Objective Evidence:	There is a social change in the estates of Sime Darby Plantation Berhad where the company has engaged into parole programme with the government. There were concerns raised by the workers during stakeholder consultation of the audit on the job opportunity for local community. However, Elphil Estate and Kamuning Estate's management plan has not included the engagement of parole programme by the group with the participation of affected stakeholders to evaluate the impact of this programme.		
Corrections:	<p><u>Kamuning Estate & Elphil Estate:</u> To communicate the engagement of parole programme by the group during NUPW meeting and the impact / issues will be include into social action plan.</p>		
Root Cause Analysis:	<ol style="list-style-type: none"> Elphil Estate and Kamuning Estate established social action plan for FY2021. However the engagement of parole programme by the group not captured into the social action plan due the action plan reviewed earlier on (Elphil Estate: 05 Jan 2021 & Kamuning Estate: 11 Jan 2021) compared to date joined of parole worker (Elphil Estate: 25 Jan 2021 & Kamuning Estate: 26 Jan 2021). The changes not reviewed in the action plan. Monitoring of changes in social management not effective at Kamuning Estate & Elphil Estate. 		
Corrective Actions:	<ol style="list-style-type: none"> To conduct social impact assessment if there is any changes into estate management and the impact will be include into social action plan immediately. 		

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	<p>2. The social action plan and the monitoring will be carried out by Estate’s appointed social representative Person In charge (Manager/ Assistant manager).</p> <p>3. To communicate social complain procedure during stakeholder meeting to ensure all the impact/ issues captured into social action plan.</p>
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Implementation of the corrective action plan will be verified during next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1893075-202003-M1	Clause & Category (Critical / Minor)	6.2.3 Critical
Closed (Yes / No)	Yes	Date of nonconformity Closure	05/06/2020
Statement of Nonconformity:	There is non-compliance with legal/labour law.		
Requirement Reference:	(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.		
Objective Evidence:	<p>Found non-compliance with legal/labour law as below: Elphil POM's contractor worker (Maju Mech):</p> <p>1. The payment of salary is paid on 10th every month, not before or on 7th every month. This is not comply with Employment Act 1955, Section 19, Time of payment of wages 19. Every employer shall pay to each of his employees not later than the seventh day after the last day of any wage period the wages, less lawful deductions, earned by such employee during such wage period: Provided that if the Director General is satisfied that payment within such time is not reasonably practicable, he may, on the application of the employer, extend the time of payment by such number of days as he thinks fit.</p> <p>2. There is no evidence that Maju Mech or Mekar Hijau Jaya Enterprise has contribute SOCSO for Md Ali. This is not comply with Akta Keselamatan Sosial Pekerja 1969, Pekeliling Majikan Bil 3 Tahun 2018.</p>		

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Corrective Actions:	<p>Next payment of salary for the month of March 2020, the payment to the contract workers should be before or on 7th every month with evidence. The contract worker has been flown back to his country due to expired permit work and no longer allowed to continue working in the mill. The mill management to ensure contract workers hired should comply with EA 1955 and Akta Keselamatan Sosial Pekerja 1969 and documented.</p> <p>Major NC verification: On site Major NC verification was not able to be conducted due to Movement Control Order in Malaysia. Major NC verification was conducted via documentation review, photos, video recordings and interview. Evidence verified: i. Maju Mech contract termination dated 13/3/2020 signed by the Mill Manager ii. New contract agreement between Elphil POM and Maju Mech Engineering (M) Sdn. Bhd. dated 1/5/2020 include clause a. No. 7. stated the salary payment must not be later than 7th. b. No. 9. stated all workers must be covered under SOCSO iii. Payslip for the month of March 2020 for workers with Passport no. BP 06xx681 paid on 5/4/2020 including Socso deduction. The evidences verified found adequate. Thus, the Major NC was effectively closed on 5/6/2020. The effectiveness of the implementation will be verified during next assessment.</p>
Assessment Conclusion:	<p>Verification during RAV, Reviewed the payslips of sampled contractors found they were paid before 7th of the following month. Contractors have made contribution to SOCSO as reviewed on the payslips and contribution list. Thus, the major non-conformance remained closed.</p>

Non-conformity			
NCR Ref #	1893075-202003-M2	Clause & Category (Critical / Minor)	6.2.2 Critical
Closed (Yes / No)	Yes	Date of nonconformity Closure	05/06/2020
Statement of Nonconformity:	The employment contract for contractor worker is not in accordance with the worker's work permit.		
Requirement Reference:	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.		
Objective Evidence:	In Elphil POM, found that contractor worker for Maju Mech namely Md Ali is a worker of Mekar Hijau Jaya Enterprise as per work permit, but having the employment contract with Maju Mech. Seen the agreement signed between Mekar Hijau Jaya Enterprise and Maju Mech on labour lent. This is not comply with Immigration Act 1959/63, Employing a person who is not in possession of a valid Pass 55B. (1) Any person who employs one or more persons, other than a citizen or a holder of an Entry Permit who is not in possession of a valid Pass shall be		

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	<p>guilty of an offence and shall, on conviction, be liable to a fine of not less than ten thousand ringgit but not more than fifty thousand ringgit or to imprisonment for a term not exceeding twelve months or to both for each such employee.</p>
Corrective Actions:	<p>The contract worker (Md Ali) has been flown back to his country due to expired permit work and no longer allowed to continue working in the mill.</p> <p>Major NC verification: On site Major NC verification was not able to be conducted due to Movement Control Order in Malaysia. Major NC verification was conducted via documentation review, photos, video recordings and interview. Evidence verified:</p> <ul style="list-style-type: none"> i. Maju Mech contract termination dated 13/3/2020 signed by the Mill Manager ii. New contract agreement between Elphil POM and Maju Mech Engineering (M) Sdn. Bhd. dated 1/5/2020 include clause: <ul style="list-style-type: none"> a. No 10. stated the workers must be direct employees of Maju Mech Engineering (M) Sdn. Bhd. iii. A copy of Maju Mech Engineering (M) Sdn. Bhd. worker passport no BP09xx101 valid till 12/8/2022 and permit no 194xx5251M valid till 20/11/2020 iv. Contract workers monitoring records with data such as: <ul style="list-style-type: none"> a. Name b. Employer c. Permit no. and expiry date d. Passport no. and expiry date e. SOCSO, EPF contribution f. Workers agreement g. Last date of salary payment <p>The evidences verified found adequate. Thus, the Major NC was effectively closed on 5/6/2020. The effectiveness of the implementation will be verified during next assessment</p>
Assessment Conclusion:	<p>Verification during RAV, Reviewed the permits of the contractor’s workers found that the permits are under employment of Maju Mech Engineering (M) Sdn Bhd and the permits are still valid. Total 2 workers are employed under Maju Mech Engineering (M) Sdn Bhd and the permits as below:</p> <ul style="list-style-type: none"> i. Permit No.: PF 0915948 ii. Permit No.: PF 1747854 <p>Thus, the major non-conformance remained closed.</p>

Non-conformity			
NCR Ref #	1893075-202003-N1	Clause & Category (Critical / Minor)	7.3.1 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	19/03/2021
Statement of Nonconformity:	Waste management plan 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:	<p>Sime Darby Industrial (SDI) is contracted to transport waste generated from maintenance activities such as used oil, used hydraulic, used battery and oil filter based on DOE's written approval, ref:AS(BB) 91/110/619/161 Jilid 14(69) dated 6th September 2011.</p> <p>At Kinta Kellas Estate, collection and disposal of waste generated from maintenance activity was done by appointed contractor, Kubota Malaysia Sdn Bhd which now no longer under full management control of Sime Darby Industrial (SDI). No evidence of written approval obtained from DOE for Kubota Malaysia Sdn Bhd's waste collection activity at the point of assessment.</p>
Corrective Actions:	<p>The implementation of the SW management will be handle by the CepSwam person. All the data related in the SW management being manage by the appointed person.</p>
Assessment Conclusion:	<p>Verification during RAV,</p> <p>The following evidence was verified:</p> <ol style="list-style-type: none"> 1) Vendors appointed to perform maintenance service on machinery are no longer allowed to take away any scheduled wastes generated from the maintenance activity. All scheduled wastes are kept by the estate and disposed through licensed collector as described under Indicator 7.3.2 of this report. 2) A competent person [ref.: Certificate No. CePSWaM/217664] has been appointed to manage the handling of scheduled wastes. Based on interview with the competent person, he was well versed on scheduled wastes handling. <p>The evidence of implementation of the correction and corrective action found to be adequate to effectively close the NCR. The continuous implementation shall be verified in the next assessment.</p>

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)
1306204M1 -5.2.2	Major	5.2.2	24/03/2016	Closed on 07/06/2016
1306204M2 – 6.5.2	Major	6.5.2	24/03/2016	Closed on 19/05/2016
1306204N1 – 4.3.2	Minor	4.3.2	24/03/2016	Closed on 23/03/2017
1306204N2 – 4.4.1	Minor	4.4.1	24/03/2016	Closed on 23/03/2017
1306204N3 – 4.7.5	Minor	4.7.5	24/03/2016	Closed on 23/03/2017
1306204N4 – 6.6.2	Minor	6.6.2	24/03/2016	Closed on 23/03/2017
1453612-201703-M1	Major	4.7.1	23/03/2017	Closed on 09/05/2017

1453612-201703-M2	Major	4.7.2	23/03/2017	Closed on 09/05/2017
1453612-201703-M3	Major	4.7.5	23/03/2017	Closed on 09/05/2017
1453612-201703-M4	Major	4.4.2	23/03/2017	Closed on 09/05/2017
1453612-201703-M5	Major	5.1.1	23/03/2017	Closed on 09/05/2017
1453612-201703-M6	Major	5.3.2	23/03/2017	Closed on 09/05/2017
1453612-201703-M7	Major	6.3.1	23/03/2017	Closed on 09/05/2017
1453612-201703-M8	Major	6.5.2	23/03/2017	Closed on 09/05/2017
1453612-201703-M9	Major	2.1.1	23/03/2017	Closed on 09/05/2017
1453612-201703-N1	Minor	4.7.3	23/03/2017	Closed on 13/03/2018
1453612-201703-N2	Minor	4.7.6	23/03/2017	Closed on 13/03/2018
1453612-201703-N3	Minor	5.3.3	23/03/2017	Closed on 13/03/2018
1453612-201703-N4	Minor	6.9.3	23/03/2017	Closed on 13/03/2018
1453612-201703-N5	Minor	6.10.3	23/03/2017	Closed on 13/03/2018
1606941-201802-M1	Major	SCCS E.5.1	15/03/2018	Closed on 14/05/2018
1606941-201802-N1	Minor	6.8.3	15/03/2018	Closed on 22/02/2019
1606941-201802-N2	Minor	5.1.2	15/03/2018	Closed on 22/02/2019
1606941-201802-N3	Minor	5.6.1	15/03/2018	Closed on 22/02/2019
1744213-201902-M1	Major	2.1.1	22/02/2019	Closed on 07/05/2019
1744213-201902-M2	Major	6.5.2	22/02/2019	Closed on 07/05/2019
1893075-202003-M1	Critical	6.2.3	13/03/2020	Closed on 05/06/2020
1893075-202003-M2	Critical	6.2.2	13/03/2020	Closed on 05/06/2020
1893075-202003-N1	Minor	7.3.1	13/03/2020	Closed on 19/03/2021
2033660-202103-M1	Critical	7.10.1	19/03/2021	Closed on 18/05/2021
2033660-202103-N1	Minor	2.2.2	19/03/2021	"Open"
2033660-202103-N2	Minor	3.4.2	19/03/2021	"Open"

3.5 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Besout Palm Oil Mill and Supply Bases 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.

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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	
Internal Stakeholders Gender Committee Representatives Workers' Representatives Parolee	Union/Contractors/ Neighbouring Villages Contractors Local Communities (Kg. Suak Plang & Kg. Temin) NUPW Officer, Ipoh
Government Departments Department of Environment, Ipoh School's Representatives (SJK (T) Ladang Changkat Salak and SJK (T) Ladang Elphil) Department of Forestry, Sg. Siput (via phone call) Department of Labour, Kuala Kangsar (via phone call)	NGO Malaysian Nature Society (via email)

Stakeholders comment	
1	Feedbacks: Contractors – They have signed an agreement and Vendor Integrity Pledge (VIP) with the management prior to work. They understood the complaint procedure and company's policies. They informed that the payment is made promptly. Management Responses: The management will ensure the payment is make on agreed timeline. Audit Team Findings: No other issue
2	Feedbacks: Local communities' representative (Kg. Suak Plang & Kg. Temin) – They raised their concern on the cattle's issue scattered around the estate has caused fatal accident. Other than that, they informed that no land encroachment issue reported. Boundaries were well demarcated. Management Responses: The management has received the concern from the respective stakeholder when they sent the stakeholder feedback form on 10/03/2021. They have incorporated into the management plan. Audit Team Findings: Reviewed the social management plan dated 16/03/2021 found that the management has incorporated the issue into the management plan. Details refer to Indicator 3.4.3.
3	Feedbacks:

	<p>Department of Environment, Ipoh – They have inspected the mill on 2nd week of March 2021 and found no major non-compliance from the mill. They informed that no complaint received since Year 2020. They have good relationship with the management.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Feedbacks: Gender Committee Representatives – They informed that no sexual harassment or violence cases reported. They have been briefed on the new mother’s need and the complaint mechanism of gender issue. The female workers are treated equally without any discrimination. Interviewed with one of the female workers confirmed that she has not been assigned for chemical or hazardous work since she is pregnant.</p> <p>Management Responses: The management will monitor if there is any case of sexual harassment or violence in the estate.</p> <p>Audit Team Findings: No other issue.</p>
5	<p>Feedbacks: Schools’ Representatives (SJK (T) Ladang Changkat Salak and SJK (T) Ladang Elphil) – They informed that they have very good relationship with the management where the management always supported the school’s activities and requests. For eg: cleaning of the school compound, supplied workers for repair work and donation. There is no any attendance issue of the students. They did not receive any complaint regarding child labour as well.</p> <p>Management Responses: The management will continue to maintain good relationship with the stakeholders.</p> <p>Audit Team Findings: No other issue.</p>
6	<p>Feedbacks: Department of Forestry, Sg. Siput – Phone interviewed with the officer confirmed that no illegal clearing of forest reported to SOU 3 Elphil complex. The authority has its’ own schedule to visit the boundary of the forest. There is no any complaint received by the authority towards SOU 3 Elphil too.</p> <p>Management Responses: The management will always ensure no illegal clearing of forest.</p> <p>Audit Team Findings: No other issue.</p>
7	<p>Feedbacks: Department of Labour, Kuala Kangsar – Phone interviewed with the officer confirmed that no complaint received from workers regarding the wages or labour right. The authority will inspect the houses in the estates annually and so far, no issue reported.</p> <p>Management Responses: The management will continue to comply with legal requirements.</p> <p>Audit Team Findings:</p>

	No other issue.
8	<p>Feedbacks: NUPW Officer, Ipoh The following issues were raised by the officer:</p> <ul style="list-style-type: none"> a) He suggested to the management to open more job opportunities to the local people instead of outsiders. b) On-job training for new local workers is not available. c) Rearing of livestock at the living quarters are not permissible. d) Medical certificate was not issued to the foreign workers if they went to clinic in the estates.
	<p>Management Responses:</p> <ul style="list-style-type: none"> a) The management has offered job opportunity to the local people. However, some of the local workers would rather work as staff instead of general workers as the vacancy offered in the estates is general workers. They have offered job to the parolee to encourage the local employment. b) The new local workers as the officer mentioned was the workers who after retirement and employed based on contract basis. They have been trained accordingly. c) This is company policy and handle by Security Department in Sime Darby Plantation Berhad. d) The Medical Assistant will issued Medical Certificate if found the worker is unfit to work due to sick. If serious case, they will be referred to panel clinic or hospital.
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> a) Verified the recruitment process such as advertisement of job vacancy and employee master listing found that local workers were in employment. b) Interviewed with the workers confirmed that they have been trained prior to work. c) No other issue. d) No other issue.
9	<p>Feedbacks: Workers (including Parole’s workers) – They were treated equally without any discrimination. All of them were paid as per Minimum Wage Order 2020 and provided with free housing facilities. Basic amenities such as clean water and electricity was supplied to the workers. They are allow to move freely without any restriction.</p>
	<p>Management Responses: The management will continue to ensure compliance to legal requirement on wages and human rights.</p>
	<p>Audit Team Findings: No other issue.</p>
10	<p>Feedbacks: <u>Malaysian Nature Society (MNS) (Comments on Environmental)</u></p> <ul style="list-style-type: none"> a) High Conservation Value (HCV) area should be properly surveyed and identified. b) HCV assessment needs to be conducted in all HCV areas, despite it was not reported in the past assessment reports. c) No planting activities are permitted in HCV areas, including areas with slopes >25°. d) The identified riparian reserves, buffers etc. need to be well managed, maintained and conserved. e) Consistent and comprehensive pollution monitoring is required to be conducted throughout SOU 3, particularly monitoring relating to air quality, water sources etc. situated within and in proximity.

- f) All wastes must be properly handled, stored and disposed.
- g) All related waste management and monitoring must adhere to existing guidelines, standards etc. from related governmental agencies etc.
- h) Environmental Management Plan (EMP) addressing to all potential significant impacts to the environment and its surrounding sensitive receptors, must be prepared and implemented.
- i) EMP shall be reviewed periodically by the Environmental Performance Monitoring Committee and revised accordingly.
- j) Related capacity building training on related guidelines, standards etc. must be provided to all workers periodically.
- k) MNS would like to highlight that there are four (4) Important Bird and Biodiversity Areas (IBAs) located in the surrounding of SOU 3, namely Bintang Range (MY04), Belum-Temengor (MY07), Kledang Range (MY08) and Central Titiwangsa Range (MY09). With that, MNS want the Sime Darby Plantation Berhad to recognise its importance and take into account in the operation and its activities in SOU 3.
- l) The established Standard Operating Manual related to environmental aspect and/or Impacts Evaluation Procedure to evaluate activities in the plantation, must be consistent throughout all three (3) estates in SOU 3.

Management Responses:

- k) Kledang Range is approximately around 6km radius from Kamuning Estate & 11km from Kinta Kellas Estate. Based on the location in the map, it is next to Menglembu until north of Ipoh. Central Titiwangsa Range is approximately around 20km radius near to Elphil Estate. Bintang Range is approximately around 40km with the nearest estate which is Kamuning Estate. Belum-Temenggor is quite far from the SOU3. More than 50km radius from north SOU3. Management can't identify the nearest points of the area. Management aware on this concern areas and found that the SOU3 has no boundary next to these ranges.

There was a Fauna Assessment conducted by FRIM at Kamuning Area specifically at Lion Hill dated on 5/8/2019 until 9/8/2019. Management are aware on this and appreciate the effort by FRIM team.

SOU3 has conducted the HCV assessment & the identified areas are monitored frequently. The observations during the monitoring time are recorded.

Sime Darby Plantation are prohibiting their employees to hunt wildlife in plantation areas except for indigenous people (if have) but they encourage not to hunting inside their land. Each estate installed the signage to signal any person who are attempt for hunting. Any encroachment of the land will be reported.

SOU3 are committed in the rehabilitation of the forest. Kamuning estate have reserve the Lion Hill as rehabilitation forest project & also identified buffer zone or CSA zone. The project already conducted & monitored by special team from SDP Head Office.

Audit Team Findings:

- a) HCV Re-Assessment for Strategic Operating Unit (SOU) 3 Elphil has been conducted on 04-06/05/2017 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final Report (Version 2.0) dated February 2017 was sighted. Details refer to Indicator 7.12.2.
- b) HCV assessment had been conducted. See Indicator 7.12.2 for details.
- c) Site visit to all the sampled estates found no planting on HCV areas including with slopes >25°. See Indicator 7.5.2 for details.
- d) Monitoring of buffer zone was based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/rivers, version 1, year

	<p>2008, issue no. 1, dated 01/11/2008. Based on verification at all the sampled estates, the riparian zones were satisfactorily maintained, and no evidence of agrochemicals application seen. See Indicator 7.8.2 for details.</p> <ul style="list-style-type: none"> e) Pollution monitoring is consistent. See Indicator 7.10.3 for details. f) Wastes management plan is developed through the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through landfill. See Criterion 7.3 for details. g) Wastes are properly managed. See Criterion 7.3 for details. h) EMP is available and implemented. See Criterion 3.4 for details. i) EMP is regularly reviewed. See Criterion 3.4 for details. j) Trainings are regularly conducted. See Criterion 3.7 for details. k) Refer to Management Responses above. l) Procedure for environmental aspect and/or Impacts Evaluation was established. Refer to Indicator 3.4.1.
<p>11</p>	<p>Feedbacks: <u>Malaysian Nature Society (Comments on OSH)</u></p> <ul style="list-style-type: none"> a) All safety precaution measures protecting potential risks to the safety and health of workers must be implemented following the Malaysian Occupational Safety and Health Act. For example, first aid kits must be provided and all items shall be properly labelled. b) Any cases involving safety and health for workers must be reported to the Department of Occupational Safety and Health. All documents must be kept as evidence. <p>Management Responses: Refer to the Audit Team findings.</p> <p>Audit Team Findings:</p> <ul style="list-style-type: none"> a) The mill and estates visited has established Emergency Response Team Reviewed. Competent first aider were present at the mill and estates. Reviewed the first aider competency certificate valid till 15/10/2022 The operating units monitored the first aid on monthly basis. Reviewed the first aid monitoring form for the month of November 2020, December 2020, January 2021 and February 2021. The operating units continuously provided training on the ERP and first aid. Reviewed the training records FY 2020. b) The operating units maintain the records of accidents including JKKP 6, JKKP 7 and JKKP 8 forms reported to DOE, medical leaves certificates, accidents investigations reports and HIRARC review. The accidents occurrence were reported to the Headquarters through Rapid 4 systems and DOSH by submitting the JKKP 6 form through MyKKP system.
<p>12</p>	<p>Feedbacks: <u>Malaysian Nature Society (Comments on Social)</u></p> <ul style="list-style-type: none"> a) The applications for workers’ legal permits, contract and other necessarily documents and its related processes, including fee, are under the responsibility of Sime Darby Plantation Berhad. b) All documents supporting workers’ legal permit etc., especially contract, must be prepared, kept and available for inspections. c) Contract must be prepared in detailed with all necessarily information. For instance, the notice of period, termination of service by the employee, overtime on rest day or public holiday etc. in the terms and conditions.

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	<ul style="list-style-type: none"> d) Meeting with the National Union of Plantation Workers (NUPW) and other monitoring agencies on workers welfare must be conducted on regular basis. All meeting minutes and related documents must be prepared and kept as evidence. e) Any reported cases of grievances and complaints from workers must be addressed and all related documents must be kept as evidence. f) The operation and management of the plantation must be adhered to the current national and international law, regulation etc., relating to human rights and workers’ welfare. For example, the Minimum Wage Order 2016 etc. g) All basic amenities and facilities must be provided to all workers and well maintained. h) Land tenure issues must be properly addressed. i) Contracts between Sime Darby Plantation Berhad with third parties (ie. contractor) shall be kept for documentations, references and presented for inspections.
	<p>Management Responses: Refer to the Audit Team findings.</p>
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> a) Interviewed with the foreign workers confirmed that the workers’ permit and FOMEMA fee are borned by Sime Darby Plantation Berhad. Employment contract was signed by the workers prior to work. b) Total of 26 employment contracts and work permits included contractor’s workers were available during the time of audit for review. c) Total of 26 employment contracts included contractor’s workers were reviewed. The terms and conditions were specifically outlined in the employment contract as per Employment Act 1955. However, there were incomplete terms and conditions outlined in the employment contract for contractor’s workers. This has been raised against Indicator 2.2.2 under NCR# 2033660-202103-N1. d) NUPW Committee was established in all the operating units and meeting was conducted accordingly with the committees. All the meeting minutes were available for review during the time of audit. Details refer to Indicator 6.3.2. e) Complaint mechanism was established in Sime Darby Plantation Berhad and implemented in all the operating units. Records of complaint were available during the time of audit. Details refer to Indicator 4.2.3. f) Reviewed total 46 payslips of the workers found that the workers were paid as per Minimum Wage Order 2020. Details refer to Indicator 6.1.6 and 6.2.2. g) Site visit to the linesites found that basic amenities such as free houses, water and electricity was provided to the workers. Linesite inspection was carried out to ensure the linesites are well maintained. Details refer to Indicator 6.2.4. h) There was no land tenure issue reported as verified through interviewed with the stakeholders. i) Contract agreement between contractors and Sime Darby Plantation Berhad was available during the time of audit. Terms and conditions were clearly outlined in the agreement.

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

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Not applicable as Sime Darby acquired (freehold and leased) all the land directly from the state of Perak 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.

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 3 Elphil Palm Oil Mill and Supply Bases has complied with the Malaysia National Interpretation 2019 for RSPO P&C 2018 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 3 Elphil Palm Oil Mill and Supply Bases is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: Hu Ning Shing	Name: Jayaganesh Dharmeseelan
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Sime Darby Plantation Bhd
Title: Lead Auditor	Title: Senior Manager
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 (Company No: 647766-V) Ladang Kamuning  Jayaganesh Dharmeseelan Senior Manager
Date: 24/05/2021	Date: 24/05/2021

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	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	Publicly available management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available. All operating units have individual documents and records to demonstrate compliance to this indicator. Sustainability Reports, policies and procedures are also accessible through the company's website: http://www.simedarbyplantation.com/ .	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	All the related information was in Bahasa Malaysia and English and accessible to the stakeholders upon request.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Elphil POM, Elphil Estate, Kamuning Estate and Kinta Kellas Estate has sent letter to the stakeholders to collect feedback towards the management during this period due to Covid-19 pandemic and movement control order in Malaysia. Letters dated 02/01/2021 from Elphil POM, 19/01/2021 from Elphil Estate, 04/03/2021 & 10/03/2021 from Kamuning Estate and 25/02/2021 from Kinta Kellas Estate that sent to stakeholders were sighted and stakeholders such as authorities, contractors, suppliers and local communities had responded the letter with comments. Evidence of letter sent with acknowledgement of receipt by stakeholders were sighted. No negative feedback received from the stakeholders for	Complied

		<p>both Elphil POM and Elphil Estate. However, there were some grievances and requests received from the stakeholder in Kamuning Estate on 15/03/2021 and Kinta Kellas Estate. The management has incorporated the issue in social management plan and in progress to communicate the action plan to the stakeholders.</p>	
<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -</p>	<p>Sime Darby Plantation Mill Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 01/11/2008). The procedure has detailing the process of handling complaints from stakeholders and the time frame for external communication to be dealt with. The time frame to provide feedback is within two weeks of the date of receipt for communication and within one week of the completion of the investigation.</p> <p>Manager of Elphil POM, Elphil Estate, Kamuning Estate and Kinta Kellas Estate has been appointed by Regional CEO as the official social officer to handle any issues related to social in the mill and estate. Appointment letter dated 02/01/2021 was sighted. The Mill Manager and Estate Manager has appointed Assistant Manager respectively to be social officer onsite and appointment letter dated 08/01/2020 for Elphil POM and 24/08/2020 for Elphil Estate was sighted.</p> <p>Elphil POM, Elphil Estate, Kamuning Estate and Kinta Kellas Estate has sent letter to the stakeholders to collect feedback towards the management during this period due to Covid-19 pandemic and movement control order in Malaysia. Letters dated 02/01/2021 from Elphil POM, 19/01/2021 from Elphil Estate, 04/03/2021 & 10/03/2021 from Kamuning Estate and 25/02/2021 from Kinta Kellas Estate that sent to stakeholders were sighted and stakeholders such as authorities, contractors, suppliers and local communities had responded the letter with comments. Evidence of</p>	<p>Complied</p>

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		letter sent with acknowledgement of receipt by stakeholders were sighted. Evidence of letter sent with acknowledgement of receipt by stakeholders were sighted. Explanation of the company's policy and complaint procedure was stated in the letter to stakeholders.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Stakeholder list was developed in Elphil POM, Elphil Estate, Kamuning Estate and Kinta Kellas Estate. The stakeholder list has included the categories of stakeholder such as local communities, government authorities, NGO, contractors and suppliers.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Sime Darby Plantation has developed and implemented Code of Business Conduct (Aug 2020) where the company implemented the integrity, respect & responsibility, enterprise and excellence during any business process. The policy was developed in Bahasa Malaysia, English and Bahasa Indonesia which can be downloaded via https://www.simedarbyplantation.com/corporate/ethical-business-practices . The policy has been briefed to the contractors on 09/10/2020 in Elphil POM. Besides, the contractors and suppliers will sign on the Vendor Integrity Pledge where Code of Business Conduct has outlined in the pledge. Briefing of the COBC was conducted on 10/03/2021 to the workers in Kamuning Estate.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Sime Darby Plantation has implemented Whistleblowing Policy to help all stakeholders raise concerns, without fear of retaliation on any wrongdoing that they may observe in Sime Darby Plantation Group. The channels of whistleblowing are such as E-form that could be downloaded via https://www.simedarbyplantation.com/corporate/whistleblowing or through email, call or write letter to the Whistleblowing unit in Head Office. Besides, the company established Internal Audit to monitor the compliance and implementation of the policy throughout the plantations. The contractors and vendors signed on Vendor Integrity Pledge (VIP) where they have to comply with the Code of Business	Complied

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		<p>Conduct and other laws and regulations. Sampled of the VIP as below:</p> <ol style="list-style-type: none"> 1. Company No.: 721668-U 2. Company No.: 800322-K 3. Company No.: 196903006010 4. Company No.: IP0082375-X 5. Company No.: 1042630-A <p>Internal audit was carried out to ensure the compliance of the company's policy as well. The last internal audit was conducted on 14/01/2021 in Elphil POM and 13/01/2021 in Kamuning Estate.</p>	
<p>Principle 2: Operate legally and respect rights</p>			
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
<p>2.1.1</p>	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>SOU 3 had continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. SOU 3 had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were:</p> <p>Elphil POM</p> <ol style="list-style-type: none"> 1. MPOB License no. 540132004000 for processing 150000 ton FFB. Valid from 26/10/2020 – 31/05/2021 2. DOE License no. 004583. Valid from 30/6/2020 – 30/6/2021 3. DOE Contradiction License no. 005440. Valid from 05/06/2020 – 04/06/2021 4. Private Installation License no. 010626/2020. Valid from 30/12/2020 – 29/12/2021 5. Competent Person <ol style="list-style-type: none"> a. CePSWAM – cert no. CePSWam/209543 b. CePPOME – cert no. CePPOME/2111644 c. First Grade Steam Engineer no. 050/2013 d. First Grade Steam Engineer no. 028/2016 	<p>Complied</p>

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		<p>e. First Aid Engine Driver no. PK 64/2002</p> <p><u>Elphil Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License no. 529849002000. Valid from 01/06/2020 – 31/05/2021 2. Air compressor <ol style="list-style-type: none"> a. Certificate of fitness no. PMT-PK/20 45929. Valid till 02/05/2021 b. Certificate of fitness no. PMT-PK/20 45930. Valid till 02/05/2021 c. Certificate of fitness no. PMT-PK/20 45931. Valid till 02/05/2021 3. Diesel <ol style="list-style-type: none"> a. Permit no. A001939, ref. no. SK/91/B.PGK.KK. Valid till 24/11/2023 b. Permit no. A001940, ref. no. SK/93/B.PGK.KK. Valid till 24/11/2023 c. Permit no. A001938, ref. no. SK/10/B.PGK.KK. Valid till 24/11/2023 4. Weighbridge calibration and stamping <ol style="list-style-type: none"> a. Serial no. 0037011-6CN, with safety sticker no. DE18 000339 dated 19/11/2020 b. Serial no. 164950029 with safety sticker no. 1.4KQ 004157 dated 17/07/2020 <p><u>Kamuning Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License <ol style="list-style-type: none"> a. License no. 524034002000. Valid from 01/10/2020 – 30/09/2021 b. License no. 524393002000. Valid from 01/11/2020 – 31/10/2021 	
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		<ol style="list-style-type: none"> 2. MPOB Oil Palm Nrsery License no. 55841011000. Valid from 01/03/2021 – 28/02/2022 3. Air compressor certificate of fitness no. PMT-PK/19 37418 and PMT-PK/19 37417. The certificate was expired on 16/01/2021. The application for renewal was done on 17/11/2020. However the DOSH officer were unable to come for inspection due to MCO and CMCO. 4. Diesel permit no. A001953 and A001954. Valid from 18/02/2021 – 17/02/2024 5. Weighbridge calibration and stamping serial no. 0138169-HN, with safety sticker no. 2.1K-Q 017658 (S/S 0320170) dated 27/07/2020 <p><u>Kinta Kellas Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License no. 528648002000. Valid from 01/04/2020 – 31/03/2021 2. Air compressor certificate of fitness no. PMT-PK/20 51492. Valid till 25/11/2021 3. Diesel permit no. A002832. Valid from 18/07/2020 – 17/07/2021 4. Weighbridge calibration and stamping serial no. B521963024, with safety sticker no. DE17 000126 dated 27/07/2020 	
2.1.2	<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>Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 3. PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and</p>	Complied

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		<p>tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p> <p>The latest legal register updated June 2020 was sighted. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Employment Act, Workers' Minimum Standard of Housing and Amenities (Amendment) Act 2190, Minimum Wages order 2020 to name a few. Other related legal for COVID19 pandemic under Prevention and Control of Infectious Diseases (Measure Within The Infected Local Areas) Regulation 2020 was also has been identified.</p>	
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>Legal boundary was clearly demarcated with red and white colour pole and security trenches along the estates boundary.</p> <p><u>Elphil POM</u> The mill located in the Elphil Estate area. The mill boundary was demarcated with fences.</p> <p><u>Elphil Estate</u> The estate legal boundary was clearly demarcated with security trenches as sighted at Kamiri Division at field P98G and P10C adjacent with smallholders' farms.</p> <p><u>Kamuning Estate</u> Sighted the legal boundary at field P16A, P00K and replanting of P97B adjacent with Kg. Suak Plang demarcated with security trenches.</p>	Complied

		<p><u>Kinta Kellas Estate</u> The estate legal boundary was clearly demarcated with security trenches as sighted at field P16A adjacent with smallholders’ farms.</p>	
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained. - Minor compliance -</p>	<p>All operating units in SOU 3 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>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. 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>	<p>Specific clause on meeting applicable legal requirements were documented in Vendor Integrity Pledge (VIP) and Vendor Code of Business Conduct (VCOBC).</p> <p>The contractor are required to understand and signed the VIP and VCOBC together with the contract agreements. In the VCOBC under section 4: Responsibility and compliance with the vendor COBC. Reviewed the contracts agreements, VIP and VCOBC between Sime Darby and FFB Supply as follows:</p> <ol style="list-style-type: none"> 1. Koperasi NLFCS Berhad (Dovenby Estate), agreement no. P/P/1220/FFB02582L 2. Koperasi NLFCS Berhad (Sg. Krudda Estate), agreement no. P/P/1220/FFB02584L 3. Koperasi NLFCS Berhad (Sg. Siput Estate), agreement no. P/P/1220/FFB02583L 4. Felcra Berhad Kawasan Kampong Jasa, agreement no. P/P/1220/FFB02580L <p><u>Kamuning Estate</u> There was engagement of contractor, Meel Enterprise Sdn Bhd (pruning activity) in the estate and the contractor has employed 4</p>	Non-compliance

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Bangladesh workers. No evidence to show that due diligence of contractor is available as below:

- 1. Payslips were not available for the workers during the time of audit.*
- 2. Permit for worker (Passport No.: BM 0701628) was registered under employer of Multi Global Enterprise but employment contract was signed with Meel Enterprise Sdn Bhd.*
- 3. Permit for the other 3 workers were not available during the audit.*
- 4. Employee Injury Scheme of SOCSO contribution was not available during the time of audit.*

Kinta Kellas Estate

The contractor, Gunasekaran (FFB transporter) has employed 4 permanent lorry drivers in the estate. The contractor only asked the workers to sign on Daftar Pekerja where it only contains total income, deduction (advance, EPF contribution, SOCSO contribution, EIS contribution), nett income and signature of the workers. However, there is no details of wages and allowances earned during the wage period, details of holidays, annual and sick leave with pay granted and date of payment as per Employment Regulation 1957.

The sampled workers as below:

- 1. I/C No.: 770817-08-50XX*
- 2. I/C No.: 680503-08-58XX*
- 3. I/C No.: 690127-08-54XX*
- 4. I/C No.: 790907-08-65XX*

Besides, reviewed the Daily Oil Mill Declared Weight – By Delivery Note for December 2020 and February 2021 found that the workers were not paid twice his ordinary rate per piece for work on rest day (Sunday). The date of work on rest day as below:

<i>I/C No.</i>	<i>Date</i>

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		<table border="1"> <tr> <td>770817-08-50XX</td> <td>13/12/2021, 07/02/2021, 14/02/2021, 21/02/2021</td> </tr> <tr> <td>680503-08-58XX</td> <td>13/12/2020, 27/12/2020, 07/02/2021, 14/02/2021, 21/02/2021</td> </tr> <tr> <td>690127-08-54XX</td> <td>13/12/2020</td> </tr> <tr> <td>790907-08-65XX</td> <td>13/12/2020, 27/12/2020, 07/02/2021, 21/02/2021</td> </tr> </table> <p><i>Thus, a minor non-conformance was raised.</i></p>	770817-08-50XX	13/12/2021, 07/02/2021, 14/02/2021, 21/02/2021	680503-08-58XX	13/12/2020, 27/12/2020, 07/02/2021, 14/02/2021, 21/02/2021	690127-08-54XX	13/12/2020	790907-08-65XX	13/12/2020, 27/12/2020, 07/02/2021, 21/02/2021	
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2.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Specific clause on disallowing child, forced and trafficked labour documented in Vendor Integrity Pledge (VIP) and Vendor Code of Business Conduct (VCOBC) under section 5.8: Abolishment of child labour and protecting the rights of children.</p> <p>The contractor are required to understand and signed the VIP and VCOBC together with the contract agreements. Reviewed the contracts agreements, VIP and VCOBC between Sime Darby and FFB Supply as follows:</p> <ol style="list-style-type: none"> 1. Koperasi NLFCS Berhad (Dovenby Estate), agreement no. P/P/1220/FFB02582L 2. Koperasi NLFCS Berhad (Sg. Krudda Estate), agreement no. P/P/1220/FFB02584L 3. Koperasi NLFCS Berhad (Sg. Siput Estate), agreement no. P/P/1220/FFB02583L 4. Felcra Berhad Kawasan Kampong Jasa, agreement no. P/P/1220/FFB02580L 	Complied								
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 	<p>Sime Darby conducted the Desktop Review for all directly source FFB from Outside Crop Producer (OCP). In the desktop review, the information reviewed as follows:</p>	Complied								

	<ul style="list-style-type: none"> 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>	<ol style="list-style-type: none"> Company name and address Location MPOB License and validity period GPS Location <p>Reviewed the FFB supplier as follows:</p> <table border="1"> <thead> <tr> <th>Supplier</th> <th>Categories</th> <th>Longitude (N)</th> <th>Latitude (E)</th> </tr> </thead> <tbody> <tr> <td>Eng Huat Latex Concentrate</td> <td>Collection Centre</td> <td>4.86116</td> <td>101.08690</td> </tr> <tr> <td>Tang Tatt Trading Sdn. Bhd.</td> <td>Collection Centre</td> <td>1.4.90292 2.4.99040 3.5.25741</td> <td>1.101.13103 2.101.13548 3.100.72247</td> </tr> <tr> <td>Felcra Berhad (Sg Siput)</td> <td>Estate</td> <td>4.76448</td> <td>101.15894</td> </tr> <tr> <td>Felcra Berhad (Kawasan Kg. Jasa)</td> <td>Estate</td> <td>4.818537</td> <td>101.136931</td> </tr> <tr> <td>Sungai Siput Estate (Koperasi NLFCS)</td> <td>Estate</td> <td>4.8623902</td> <td>101.0979030</td> </tr> <tr> <td>Sungei Krudda Estate (Koperasi NLFCS)</td> <td>Estate</td> <td>4.9067364</td> <td>101.0911257</td> </tr> </tbody> </table>	Supplier	Categories	Longitude (N)	Latitude (E)	Eng Huat Latex Concentrate	Collection Centre	4.86116	101.08690	Tang Tatt Trading Sdn. Bhd.	Collection Centre	1.4.90292 2.4.99040 3.5.25741	1.101.13103 2.101.13548 3.100.72247	Felcra Berhad (Sg Siput)	Estate	4.76448	101.15894	Felcra Berhad (Kawasan Kg. Jasa)	Estate	4.818537	101.136931	Sungai Siput Estate (Koperasi NLFCS)	Estate	4.8623902	101.0979030	Sungei Krudda Estate (Koperasi NLFCS)	Estate	4.9067364	101.0911257	
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<p>2.3.2</p>	<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>	<p>Information with regards of indirect source of FFB from out-growers are still in progress.</p> <p>The GSQM has conducted roadshow to meet all the relevant FFB supplier to brief on the action plan to be done onwards. Latest briefing for SOU 3 has been conducted on 11/01/2021.</p>	<p>Complied</p>																												

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 3 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 2021 – 2025.</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 2021 and business plan FY 2021 – FY 2025.</p> <p>In the 5 years business plan include items as follows:</p> <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 	Complied

		<p>v. Road and bridges vi. Cost of production.</p> <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2025) and well documented upon request.</p>																									
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>SOU 3 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>Elphil</td> <td>0.00</td> <td>168.45</td> <td>159.24</td> <td>219.94</td> <td>205.99</td> </tr> <tr> <td>Kamuning</td> <td>83.00</td> <td>285.00</td> <td>274.00</td> <td>290.00</td> <td>242.19</td> </tr> <tr> <td>Kinta Kellas</td> <td>0.00</td> <td>63.01</td> <td>169.03</td> <td>121.53</td> <td>122.99</td> </tr> </tbody> </table>	Estate	2021	2022	2023	2024	2025	Elphil	0.00	168.45	159.24	219.94	205.99	Kamuning	83.00	285.00	274.00	290.00	242.19	Kinta Kellas	0.00	63.01	169.03	121.53	122.99	Complied
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3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Sime Darby has established SOP on Management Review documented in SOM, Section 5, and Management responsibility version 2, issued in 2015. Management review was conducted on annually basis by Operating Unit as per SOP established. Latest management review meeting was conducted at each operating units as follows:</p> <table border="1"> <thead> <tr> <th>Operating Unit</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Elphil POM</td> <td>15/02/2021</td> </tr> <tr> <td>Elphil Estate</td> <td>18/01/2021</td> </tr> <tr> <td>Kamuning Estate</td> <td>18/01/2021</td> </tr> <tr> <td>Kinta Kellas Estate</td> <td>19/01/2021</td> </tr> </tbody> </table>	Operating Unit	Date	Elphil POM	15/02/2021	Elphil Estate	18/01/2021	Kamuning Estate	18/01/2021	Kinta Kellas Estate	19/01/2021	Complied														
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<p>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.</p>																											

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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>Action plan for continuous improvement is addressed in various management plans such as:</p> <ul style="list-style-type: none"> - OSH Management Plan - Environmental Management Plan - HCV Management plan - Social Management Plan - Energy & GHG Management Plan - Water Management Plan <p>These plans are described in detail under other indicators of this report.</p>	Complied
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:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>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>	<p>Latest submission of Annual Communications of Progress (ACOP) done for year 2019 available as in RSPO website link at https://rspo.org/members/29.</p>	Complied
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>SOP available for the Palm Oil Mill and the Estates.</p> <p>Palm Oil Mill holds two SOPs: Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill.</p>	Complied

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		Estates have a separate SOP (Sime Darby SOP issued 02/01/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc. Noted updated procedure under SOP for water analysis and RSPO SCCS procedure.	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	<p>Apart from the routine supervision by the mill and estates staff, other mechanism such as:</p> <ul style="list-style-type: none"> - Plantation Advisory Departmenting Advisor inspect and report on the operations on annual basis - Crop Recovery Assessment visit by the Performance Monitoring Unit - Internal audit - to ensure compliance against RSPO Standard - DOE's License Compliance Checklist [<i>Senarai Semak Pematuhan Syarat Lesen (Lampiran D)</i>] 	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>Records of monitoring were available in various formats. Among the records verified were:</p> <ul style="list-style-type: none"> - Planting Advisor inspect and report on the operations on annual basis Verified report no. NRT SOU3/KE/1/2021, dated 21/01/2021 and NRT SOU3/KE/1/2020, dated 17/07/2020 - Internal audit mill – 14/01/2021 - DOE's License Compliance Checklist – last submission on 27/08/2020 - Estate Structured Crop Recovery Assessment Report, e.g. report dated 27/07/2020 (Elphil) 	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.	There is no new planting in the sampled estates. Nonetheless, the assessment of environmental impact of its existing activities is documented in the following documents:	Complied

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	<p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> • Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register • Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI • Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE <p>Social Impact Assessment was conducted on 24 – 27/08/2015 in SOU 3 Elphil complex by Social & Environment Projects Unit, PSQM Department. As refer to the assessment report found that stakeholders such as authorities, local communities, contractors and internal workers were participated in the assessment. Social profile such as social background of employees, background of local community, education, safety & health, living condition, infrastructure and amenities and stakeholder engagement was assessed. Issues of concern raised by the stakeholders were recorded in the report.</p>	
3.4.2	<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>Environment Aspect and Impact Identification for various activities such as construction work, compound, dispensary, field, harvesting and collection, main entrance, pest and disease control, petrol and diesel, power station, replanting, road, schedule waste store, workshop, boiler, effluent treatment plant, smoke emission, etc.</p> <p>After the EAI is completed, the Environmental Impact Evaluation is conducted to evaluate the impact severity using a format (Environmental Impact Evaluation Form). There are 3 classifications of impact established in order to justify the action plan (mitigations) required i.e.:</p>	<p>Non-compliance</p>

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		<table border="1" data-bbox="1153 395 1904 563"> <tr> <td colspan="2">Guidance of Action required</td> </tr> <tr> <td>100 ~ 199</td> <td>No action required</td> </tr> <tr> <td>200 ~ 249</td> <td>To initiate corrective and preventive actions</td> </tr> <tr> <td>250 and above</td> <td>To develop environmental objective and programme</td> </tr> </table> <p>Mitigation measures were documented in Pollution Preventive Plan (PPP).</p> <p>The social management and monitoring plan were developed with the participation of stakeholders such as via stakeholder consultation, NUPW meeting and Gender Committee meeting. The last reviewed of the management plan was conducted on 01/03/2021 in Elphil POM, 17/01/2021 in Elphil Estate, 16/03/2021 in Kamuning Estate and 15/03/2021 in Kinta Kellas Estate.</p> <p><i>There is a social change in the estates of Sime Darby Plantation Berhad where the company has engaged into parole programme with the government. There were concerns raised by the workers during stakeholder consultation of the audit on the job opportunity for local community. However, Elphil Estate and Kamuning Estate's management plan has not included the engagement of parole programme by the group with the participation of affected stakeholders to evaluate the impact of this programme.</i></p> <p><i>Thus, a minor non-conformance was raised.</i></p>	Guidance of Action required		100 ~ 199	No action required	200 ~ 249	To initiate corrective and preventive actions	250 and above	To develop environmental objective and programme	
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3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Updating of the progress of plan is carried out by the relevant persons in-charge and the results of the monitoring effectiveness are reviewed in the management units operating meetings. Mitigation measures were included in the environmental management plan and reviewed from time to time.</p>	Complied								

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		<p>Reviewed the social management plan that developed on 07/02/2020 in Elphil POM, 23/12/2020 in Elphil Estate and 05/05/2020 in Kamuning Estate found that the action has been taken to resolve the area of concerns raised by the stakeholder. Sampled of issues as below:</p> <ol style="list-style-type: none"> 1. The Headmistress of SRJK (T) Ladang Elphil has requested the management to clean the area behind the school. Seen the photo evident of action taken. Interviewed with the Headmistress confirmed that the management has taken action accordingly to resolve their requests. 2. The representative of Sungai Siput has raised concerned on the drainage system during the replanting program outside the boundary of Kamuning Estate. The management has desilted the drainage during replanting activity and seen the photo evident of desilting work done on 16/01/2020. <p>For social management plan dated 01/03/2021 in Elphil POM, 17/01/2021 in Elphil Estate, 16/03/2021 in Kamuning Estate and 15/03/2021 in Kinta Kellas Estate found the area of concerns as below:</p> <ol style="list-style-type: none"> 1. Area of concern: Drain blockage behind the house area. Action plan: The mill management will immediately clean the area. Status: The management has cleaned the drainage and seen the photo evident of the cleaning on 15/09/2020. 2. Area of concern: Request to grass cut the football field at SJK (T) Ladang Elphil. Action plan: Elphil Estate’s management will conduct schedule grass cutting. 	
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		<p>Status: The management has carried out twice a month of grass cutting at the football field. This has confirmed with the Headmistress that the management has taken action accordingly.</p> <p>3. Area of concern: Grievance of cattle issue which caused fatal accident in area of Kamuning Estate. Action plan: The management has carried out meeting with the cattle’s owners before the complaint lodged by the community on 22/01/2021. Seen the meeting minutes and the management has discussion with the cattle’s owners to clear off the cattle from the estate. Status: The management in progress to clear off the cattle in the compound of estate.</p> <p>4. Area of concern: Kinta Kellas will employ Parolees in the estate. Action plan: The management briefed to all the workers on the employment of Parolees. Status: Briefing was conducted on 06/01/2021 and no feedbacks received from the workers. This has verified through interview with the workers during the audit.</p>	
Criterion 3.5: A system for managing human resources is in place.			
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>The Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/3/2016) and Guideline on the Recruitment of Local Workers dated 07/12/2020 to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries whereas the recruitment of local workers will be in charged by the respective operating units through job vacancy advertisement or recommendation from workers.</p>	Complied

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3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Application form, employment interview assessment form, medical check-up report and employment contract. The latest recruitment of workers in Elphil POM was on 01/03/2021 and 01/01/2021 in Kamuning Estate. A copied of identification card was kept as well. Seen the photo of job vacancy banner displayed at the junction of main road in Kamuning Estate. Sharing of job vacancy via social media such as WhatsApp group and through word of mouth of the workers to their friends and family as well.</p>	Complied
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
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 Upstream Malaysia Health, Safety and Environment (HSE) Policy Statement signed by the CEO Upstream Malaysia dated 01/06/2020. The policy stated the company commitment to provide safe and healthy workplaces and operating in an environmentally responsible manners in all operations in Malaysia. 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. 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>The operating units has conducted assessment on health and Safety issue in their operation and documented in the HIRARC register. The HIRARC register was reviewed at minimum once a year or during accident occur or changes in the operation.</p> <p>Elphil POM FY 2020, the HIRARC was reviewed 5 times due to accident occurrences. Latest review for FY 2020 was conducted on</p>	Complied

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		<p>01/07/2020 due to accident occur at water treatment plant on 30/06/2020. FY 2021, annual review was conducted on 07/01/2021.</p> <p><u>Elphil Estate</u> FY 2020, the HIRARC was reviewed 1 times due to accident occur on 30/06/2020 under section decreeping. FY 2021, annual review was conducted on 04/01/2021 by the Asst. Manager. No changes made since last reviewed.</p> <p><u>Kamuning Estate</u> The estate have reviewed the HIRARC for a total of 6 times in FY 2020 due to occupational accident and health/poisoned cases occur in the estate. The HIRARC were reviewed base on recommendation during accident investigation conducted. Reviewed the HIRARC for accident cases occur on 05/10/2020 and 22/08/2020. FY 2021, annual review was conducted on 07/01/2021.</p> <p><u>Kinta Kellas Estate</u> The HIRARC was reviewed 2 times in FY 2020 due to accident occur at the harvesting and general work department. Latest review was conducted on 07/12/2020 for accident on 18/11/2020.</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 mill has established Safety and Health plan was documented in OSH and Other Requirements Plan FY 2021. Reviewed the implementation of the management plan FY 2020 as follows:</p> <p><u>Elphil POM</u></p> <ol style="list-style-type: none"> 1. The latest Chemical Hazard risk Assessment was conducted on 25/08/2020. Refer report no. HQ/09/ASS/00/124-2020/0033 by registered assessor with reg. no. HQ/09/ass/00/124. 	Complied

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		<ol style="list-style-type: none"> 2. The mill has sent workers exposed to chemicals for medical surveillance as per recommendation in CHRA reports. Latest medical surveillance was conducted on 29/01/2021 by registered OHD with reg. no. HQ/11/DOC/00/200. 14 workers were sent for surveillance and found fit to work as chemical handlers. 3. The mill has conducted Noise Exposure Monitoring on 21-22/12/2020 by registered assessor with reg. no. HQ/09/PEB/00/97. 4. The mill monitored the first aid on monthly basis. Reviewed the first aid monitoring form for the month of November 2020, December 2020, January 2021 and February 2021. <p><u>Elphil Estate</u></p> <ol style="list-style-type: none"> 1. The estate conducted the preventive vehicle maintenance for the vehicle on daily basis to ensure all the vehicle in good conditions at all time. Reviewed the PMV records for tractor TC002 and TF015 for the month of February and March 2021. 2. The estate conducted the workplace inspection on quarterly basis prior to OSH committee meeting. Reviewed the report dated 18/01/2021 and 28/08/2020. 3. The estate conducted first aid monitoring on monthly basis. The monitoring checked on the items and expiry date. Reviewed the monitoring records for month of October, November and December 2020. 15 first aid box were present at the estate. <p><u>Kamuning Estate</u></p> <ol style="list-style-type: none"> 1. Latest CHRA was conducted on 26/08/2020 by assessor with DOSH reg. no. HQ/09/ass/00/124. Refer report no. HQ/09/ASS/124 – 2020/0034. 	
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		<ol style="list-style-type: none"> 2. The estate updated and monitored the type of chemical usage on annually basis. Reviewed the chemical register dated 04/01/2020. 3. The estate continuously implement the SIME Card system to enhance the involvement of all employee on safety in workplace. Reviewed the SIME Card records for the month of November and December 2020. <p><u>Kinta Kellas</u></p> <ol style="list-style-type: none"> 1. Latest CHRA was conducted on 26/08/2020 by assessor with DOSH reg. no. HQ/09/ass/00/124. Refer report no. HQ/09/ASS/124 – 2020/0032. 2. Latest medical surveillance was conducted on 08/03/2021 by OHD with reg. no. HQ/08/DOC/00/649 for 9 workers who involve in chemical handling. The result has yet to be received by the estate during the audit. 3. The estate has in placed 15 units of first aid box. The monitoring was conducted by the Medical Assistant on monthly basis. Latest monitoring was conducted on 27/02/2021. 	
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 operating units visited has conducted training need analysis for all employee, management and contractors. The need analysis was conducted base on the job designation and training required by the job type.</p> <p>Trainings was identified for management, employee and contractors and programmed throughout FY 2020 and 2021. The training identified covers the safety and health, environmental and social aspect.</p>	Complied

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		<p>Additionally, 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>	
<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p><u>Elphil POM</u></p> <ol style="list-style-type: none"> 1. Chemical handling training dated 16/12/2020 2. First Aid refresher training dated 16/07/2020 3. JAR Test training dated 06/07/2020 4. Payslip and wage calculator refresher training dated 24/11/2020 5. Payslip training dated 13/03/2021 6. Covid 19 guidelines and Policy briefing dated 22/01/2021 7. Scheduled waste training dated 18/01/2021 8. Work and rest day, working at night and pregnant woman training dated 15/01/2021 9. Hearing conservation and working at height training dated 11/12/2020 10. Axillary police induction training dated 08-11/12/2020 11. Covid 19 guidelines briefing dated 09/04/2020 12. Workshop SOP training dated 27/02/2020 <p><u>Elphil Estate</u></p> <ol style="list-style-type: none"> 1. Harvesting Competency Training program dated 13/10/2020 2. Policy briefing dated 13/01/2021 3. OSH committee awareness and HCV training dated 28/12/2020 4. Safety passport and whistle blowing briefing dated 26/12/2020 5. Chemical safety handling and Ergonomic training dated 15/11/2020 6. Chemical Health Risk Assessment briefing dated 30/09/2020 	<p>Complied</p>

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		<ul style="list-style-type: none"> 7. Driving and hearing conservation training dated 18/09/2020 8. Covid 19 guideline and ERP training dated 09/04/2020 <p><u>Kamuning Estate</u></p> <ul style="list-style-type: none"> 1. Recycle campaign briefing dated 16/03/2021 2. Fire drill training dated 11 and 13/03/2021 3. Whistleblowing and COBC briefing dated 10/03/2021 4. First Aid training dated 03 and 05/03/2021 5. HIRARC training dated 03/03/2021 6. Replanting safety briefing dated 22/02/2021 7. Driver competency training dated 17/02/2021 8. Interpump training 15/02/2021 9. HCV training dated 29/01/2021 10. Chemical handling and Scheduled Waste training dated 29/01/2021 11. IPM training dated 11/01/2021 12. Circle spraying training dated 11/12/2020 13. Circle spraying training dated 11/11/2020 14. PPE and chemical handling training dated 08/10/2020 15. Safety townhall for vendor and contractors dated 09/10/2020 <p><u>Kinta Kellas Estate</u></p> <ul style="list-style-type: none"> 1. Trunk Injection training dated 27/02/2021 2. Interpump maintenance and PPE training dated 23/02/2021 3. Welding and vehicle maintenance work training dated 12/02/2021 4. Manuring training dated 03/02/2021 5. Company Policy, Buffer zone, HCV and whistleblowing briefing dated 20/01/2021 6. Ergonomic Risk Assessment principle training dated 21/12/2020 7. Frond Stacking training dated 11/12/2021 	
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		<p>8. Tractor driving training dated 09/12/2020</p> <p>9. Hearing conservation training dated 05/11/2020</p> <p>10. Spraying method, SOP and PPE training dated 02/06/2020</p> <p>11. Rhinoceros Beetle SOP and PPE training dated 24/05/2020</p> <p>12. Chemical handling and Scheduled Waste training dated 20/05/2020</p> <p>13. Rat baiting method training dated 02/05/2020</p>	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The mill has identified all relevant personnel involve in supply chain system such as Mill Manager, Asst. Mill Manager, QA Supervisor, Weighbridge Operator, Checkroll Clerk and Axillary Police. The mill conducted the training need analysis for the personnel identified in SCCS. Latest training was conducted on 11/12/2020.</p>	Complied
<p>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)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>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.</p> <p>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.</p>	<p>Elphil POM receives RSPO Certified FFB from certified sources and third parties' crops. The mill is certified with Mass Balance modules and thus, this is not applicable.</p>	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>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</p>	<p>The mill is declared to be Mass Balance module because the mill received FFB from certified sources and non-certified third parties' crop. As per the Standard Operating Procedure (SOP) for</p>	Complied

	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.	Sustainable Supply Chain & Traceability, Version 2 dated April 2019, Elphil POM is certified under Mass Balance module.	
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 (see Table 10).	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 registration of PalmTrace will be carried out by the GTM Department, HQ. All transaction will be registered in the PalmTrace. The mill registered license available in PalmTrace as following: - Member ID: RSPO_PO1000000191 - Member category: Oil Mill - RSPO Membership No.: 1-0008-04-000-00	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: 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	Sime Darby Plantation has developed Plantation Quality Management System – Sustainable Plantation Management System, Appendix 15, Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability, Version 2 dated April 2019. The procedure was established which covers responsibility, reporting of certified CPO/PK, non-conforming products and/ or documents, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, record keeping, training, complaints, management review and product claim.	Complied

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	<p>to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p> <p>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>	<p>The mill has conducted Supply Chain training to the critical control point personnel such as weighbridge operator, auxiliary police and QA supervisor on 11/12/2020.</p> <p>The Mill Manager as Head of Operating Unit have the overall responsibility for the implementation of SOP and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Mill Manager has appointed Assistant Manager as person in charge for SCCS and appointment letter dated 11/02/2021 was sighted.</p>	
<p>3.8.6</p>	<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>Version 2 dated April 2019. Internal Audit Procedure, Doc. No.: SD/SDP/PSQM/IAP, Rev. 2 dated 01/11/2017 was established where the internal audit shall be conducted at least once a year.</p> <p>The latest Internal Audit for RSPO SCCS was conducted by GSM Malaysia & Northern RSQM on 11/02/2021. There were 3 major non-conformances raised. The non-conformances were closed on 11/02/2021 and 15/02/2021 as verified by the auditor. Corrective action plan was developed with root cause identified.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>i) The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate’s ticket number is recorded in the mill’s ticket number.</p>	<p>Complied</p>

	<p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>ii) There has been no projected overproduction during the period under reviewed. Nonetheless, based on interview with the staff, the facility is aware of this requirement</p> <p>iii) Handling of non-conforming FFB and/or documents is addressed in the Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019, Clause 7.7. There has been no issue about non-conforming FFB and/or document during the period under review.</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>Elphil POM ensured the required information is available in document form. Based on sampled contracts [i.e. S/C-PSD/2102/PK0113 and S/C-PSD/2102/CPO0095], the following information was available:</p> <ul style="list-style-type: none"> The name and address of the buyer The name and address of the seller i.e. KKS Elphil, Bt 6, Jln Lintang, 31100 Sg Siput (U), Perak The loading or shipment/ delivery date The date on which the documents were issued A description of the product, including the applicable supply chain model, e.g. "0008-PALM KERNEL-RSPO MB" or "0007-CRUDE PALM OIL (CPO)-RSPO MB" The quantity of the products delivered Related transport documentation, e.g. Despatch note Supply chain certificate number of the seller e.g. On weighbridge ticket e.g. RSPO 550180 A unique identification numbers - available in a few forms e.g. DN no., seal no., etc. 	Complied
3.8.9	<p>Outsourcing Activities</p>	<p>There is no any outsourcing activity related to processing and storage except for transporter of CPO. Delivery of PK is arranged</p>	Complied

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	<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 operations, systems, and all information, when this is announced in advance.</p>	<p>by the customers. Seen the Letter of Award (LOA) for the CPO transporter dated 12/12/2020 which valid until 31/10/2023. Requirements of RSPO was stated under Clause 5 (d) in the LOA. The contractor shall permit the Certification Bodies appointed by the company to conduct audit on its or its sub-contractors' operations.</p>	
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.	The mill has recorded the details of the contractors engaged by the mill in the stakeholder list.	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.	There were no new contractors used for the physical handling of RSPO certified products by the mill.	Complied
3.8.12	Record keeping	i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible.	Complied

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	<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"> ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019. iii) NA as the mill is implementing MB model. iv) Balance sheet entitled "RSPO Records for Oil Mills" from March 2020 to February 2021 is referred to. Transaction data is reconciled every 3 months. No negative stock recorded. 	
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>Conversion factor of CPO and PK production is depending on the actual OER and KER as shown in Table 10 of this report.</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>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</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>	NA as the mill is implementing MB model.	Not Applicable
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>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.</p>	<p>i) The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace.</p> <p>ii) RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	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	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	No off-product claim made by Elphil POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p>	<p>Sime Darby Plantation Berhad has displayed its membership of RSPO and RSPO web address in the company's website: https://www.simedarbyplantation.com/sustainability/programmes/responsible-agriculture-practices/sustainability-certification.</p>	Complied

	<p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Sime Darby Plantation Berhad does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
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.	Sime Darby Plantation Berhad ensure 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.	Complied
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 RSPO corporate logo used as evidence during the document audit and site visit.	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.	The only business to business communication is through the delivery documents. There is no use of trademark logo. Only the communication with RSPO certification number and supply chain model.	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.	The only business to business communication is through the delivery documents. There is no use of trademark logo. Only the communication with RSPO certification number and supply chain model.	Complied
5.3	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:	Elphil POM is not a distributor or wholesaler. Thus, this is not applicable.	Not Applicable

	<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>		
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 products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
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.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.5	Members shall not communicate to consumers’ information about their suppliers’ RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	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.	There was no use of RSPO Trademark logo used on product claim.	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.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the 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 .	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Elphil POM is producing crude palm product and does not involved in any labelling of end product.	Not Applicable
	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	Elphil POM is producing crude palm product and does not involved in any labelling of end product.	Not Applicable

	requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.		
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. Wherever the 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 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	Elphil POM is producing crude palm product and does not involved in any labelling of end product.	Not Applicable
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. 	Elphil POM is producing crude palm product and does not involved in any labelling of end product.	Not Applicable

	<ul style="list-style-type: none"> The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 		
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<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>Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised on August 2020. They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs)</p>	<p>Complied</p>

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		dated 25/03/2020 for more information. Policy on the Protection of HRDs FINAL.pdf (simedarbyplantation.com) .	
		The policy has been briefed to the contractors and suppliers when they signed on the Vendor Integrity Pledge (VIP) and a briefing was conducted on 09/10/2020 in Elphil POM. Besides, the briefing of the policies was conducted on 15/03/2021 in Elphil POM, 14/10/2020 in Elphil Estate and 22/01/2021 in Kamuning Estate.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Sime Darby Plantation prohibits any form of harassment in their operation as per the policies above. Interviewed with the workers confirmed that no harassment by the management.	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	(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 whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistleblowers, complainants and community spokespersons play by lodging complaints in confidence.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Sime Darby Plantation has developed Flowchart & Procedures for Handling Social Issues, version 1, dated 01/11/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing . The mill management has issued letter to the relevant stakeholders on 02/01/2021 to collect feedbacks from the stakeholders. The letter has included the information of complaint	Complied

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		<p>procedure and platform to lodge complaint. Briefing of whistleblowing policy was done on 26/12/2020 in Elphil Estate and 22/01/2021 in Kamuning Estate. Interviewed with the external stakeholders and worker confirmed that they are understood the procedures.</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. - Minor compliance -</p>	<p>Elphil POM has implemented Internal & External Complaint Book and Housing Complex Defect form to record any complaints from stakeholders. There was no complaint received from stakeholders since last audit. Sampled the complaints on housing defect as below:</p> <ol style="list-style-type: none"> 1. Issue: Tiles of the floor in living room of House No. 20 were crack. Action Taken: The management has replaced new tiles at the area on 29/02/2020 and seen the photo evident of the repair work done. 2. Issue: Cracking wall, piping leakage in toilet, malfunction of fan at House No. 9. Action Taken: The management has taken action to repair the issues on 14/12/2020 and seen the photo evident of repair done. Site visit to the House No. 9 confirmed all the issues reported were resolved. <p>Elphil Estate and Kinta Kellas Estate has implemented complaint book and form to record any grievances from stakeholders. Most of the complaints related to housing defects. Sampled of the complaints as below:</p> <ol style="list-style-type: none"> 1. Issue: Broken ceiling at House No.: WQ 16/11 J dated 22/01/2021. Action: The management has informed the contractor to carry out the respective issue and verified the complaint book that the contractor has repaired on 24/01/2021. Complainant has acknowledged on the column after 	<p>Complied</p>

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		<p>complaint has been resolved. Seen the quotation from contractor and contract form payment for the repair worked done. Contract Form No.: 4300537461 dated 17/03/2021 sighted.</p> <p>2. Issue: Leakage of roof, broken of water pipe and toilet door broken at House No.: 95 dated 01/12/2020. Action: The management has informed the contractor to carry out the respective issues and the contractor has repaired on 12/12/2020 and 12/01/2021. Complainant has acknowledged on the column after complaint has been resolved. Interviewed with the complainant confirmed that the management has taken action to resolve the complaints. Seen the quotation from contractor and contract form payment for the repair worked done. Contract Form No.: 4300527094 dated 17/03/2021 sighted.</p> <p>3. Issue: 3 units of fan not functioning at House No.: 137/24 dated 16/01/2021. Action: The management has informed the contractor to replace the malfunction fans accordingly. The contractor has replaced on 18/01/2021 and acknowledged by the complainant after complaint resolved. Seen the quotation dated 29/01/2021 issued by the contractor after repair work completed.</p> <p>Kamuning Estate has implemented External Complaint Book and Housing Defect Book to record any grievances from stakeholders. There was no written complaint from external stakeholders. Any issues from external stakeholder have been raised during stakeholder meeting. Most of the complaints related to housing defects. Sampled of the complaints as below:</p> <p>1. Issue: Broken roof at House No.: A8 dated 02/10/2020.</p>	
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		<p>Action: The management has instructed the carpenter to replace the broken roof. The roof was replaced on 03/11/2020 and seen the photo evident of repaired work done.</p> <p>Interviewed with the workers confirmed that the management has kept them informed for the progress of the action taken and action taken immediately after they lodged the complaint.</p>	
4.2.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>The mill and estates' management have made contribution to the local communities based on the results of consultation and communication such as the schools' representatives have requested the management for cleaning of school compound and spraying at the field during the stakeholder meeting. The management has sent the workers for cleaning of the school compound and this has verified through interviewed with the</p>	Complied

		<p>schools’ representatives. Besides, the schools’ representatives informed that the management has provided good assistance to the schools such as donation and attended to their requests. Management of Kamuning Estate has taken initiative to implement Green Book project for the workers to cultivate vegetation.</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. - Critical (Major) compliance -</p>	<p>Elphil POM is located in the land of Elphil Estate under the land title No.: 45690; Lot No.: 1195.</p> <p>There are total 21 land titles in Elphil Estate and the estate able to show legal ownership on the use of land. Sampled the land title as below:</p> <ol style="list-style-type: none"> 1. Land title No.: 58566; Lot No.: 1095; 179.7813 hectares (1.1843 hectares acquired road upgrading) and now 179.3036 hectares 2. Land title No.: 82499; Lot No.: 18737; 168.40 hectares 3. Land title No.: 62451; Lot No.: 1418; 81.7464 hectares <p>There are total 58 land titles in Kamuning Estate and the estate able to show legal ownership on the use of land. Sampled the land title as below:</p> <ol style="list-style-type: none"> 1. Land title No.: 12951; Lot No.: 6464; 39.829 hectares 2. Land title No.: 63611; Lot No.: 67; 15.6815 hectares 3. Land title No.: 12934; Lot No.: 6414; 697.6797 hectares <p>There are total 58 land titles in Kinta Kellas Estate and the estate able to show legal ownership on the use of land. Sampled the land title as below:</p> <ol style="list-style-type: none"> 1. Land title No.: 58185; Lot No.: 15105; 18.1653 hectares 2. Land title No.: 150078; Lot No.: 6103; 3.0073 hectares 3. Land title No.: 48661; Lot No.: 20043; 8.9612 hectares 	<p>Complied</p>

4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</p>	Complied
4.4.2a	<p>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.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</p>	Complied
4.4.2b	<p>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.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	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	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities.</p>	Complied

	status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	Boundary stone and trenches were available to demarcate the boundary of land.	
4.4.3	(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). - Critical (Major) compliance -	There is no land dispute recorded. Boundary stones were identified and marked in the boundary map. Site visit to the boundary with smallholders confirmed that physical marking to demarcate of boundary was sighted such as fencing and red pile.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.5	(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. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Criterion 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	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	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>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	<p>Complied</p>
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>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	<p>Complied</p>
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>- Minor compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	<p>Complied</p>
4.5.5	<p>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.</p> <p>- Minor compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	<p>Complied</p>

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 -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	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 -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	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	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.6.2	(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. - Critical (Major) compliance -	SOP as per indicator 4.6.1.	Complied

4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Criterion 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.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	SOP as per indicator 4.7.1.	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 -	There was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.	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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
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 certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
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	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>The mill only buy FFB from plantations and collection centre. The FFB price were available and stated in the contract under section 8: Pricing of FFB under Third Schedule. The price were agreed between Sime Darby and FFB supplier. Reviewed the contract as follows:</p> <ol style="list-style-type: none"> 1. Koperasi NLFCS Berhad (Dovenby Estate), agreement no. P/P/1220/FFB02582L 2. Koperasi NLFCS Berhad (Sg. Krudda Estate), agreement no. P/P/1220/FFB02584L 3. Koperasi NLFCS Berhad (Sg. Siput Estate), agreement no. P/P/1220/FFB02583L 4. Felcra Berhad Kawasan Kampong Jasa, agreement no. P/P/1220/FFB02580L 	Complied
5.1.2	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>Evidence for regular explanation on the FFB pricing to out growers/smallholders is available. Briefing was done during contract signing session which was last done in January 2020.</p>	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>The FFB price were available and stated in the contract under section 8: Pricing of FFB under Third Schedule. The price were agreed between Sime Darby and FFB supplier. Reviewed the contract as follows:</p> <ol style="list-style-type: none"> 1. Koperasi NLFCS Berhad (Dovenby Estate), agreement no. P/P/1220/FFB02582L 2. Koperasi NLFCS Berhad (Sg. Krudda Estate), agreement no. P/P/1220/FFB02584L 3. Koperasi NLFCS Berhad (Sg. Siput Estate), agreement no. P/P/1220/FFB02583L 4. Felcra Berhad Kawasan Kampong Jasa, agreement no. P/P/1220/FFB02580L 	Complied

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>	<p>No binding contract between mill and out growers that includes finance, loans/credit and repayments through FFB price reductions for replanting and or other mechanisms at Elphil POM. Thus, this indicator is not available.</p>	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>The contracts were legal and transparent to the contractors. The contract time frame were stated in the First Schedule under section 7. Reviewed the contract as follows:</p> <ol style="list-style-type: none"> 1. Koperasi NLFCS Berhad (Dovenby Estate), agreement no. P/P/1220/FFB02582L 2. Koperasi NLFCS Berhad (Sg. Krudda Estate), agreement no. P/P/1220/FFB02584L 3. Koperasi NLFCS Berhad (Sg. Siput Estate), agreement no. P/P/1220/FFB02583L 4. Felcra Berhad Kawasan Kampong Jasa, agreement no. P/P/1220/FFB02580L 	Complied
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>	<p>The breakdown of the monthly payment was stated in the contract in First Schedule/Attachment 1 in the contract. The payment were made by the Headquarters. Reviewed the contract and payment records between:</p> <ol style="list-style-type: none"> 1. Sime Darby Elphil Estate with Kang Yeap Tractor Works dated 01/05/2020. Reviewed the payment document for the month of February 2020 as per document no. 2100016786. 2. Sime Darby kamuning Estate with Meel Enterprise payment document for the month of February 2020 as per document no. 2100015641 dated 01/03/2021. 3. Sime Darby Kinta Kellas Estate with Ani Bird Enterprise payment document for work done for June 2020 as per invoice 	Complied

		no. SINV-001/20 submitted on 02/07/2020. Payment has been made as per document no. 2100056692.	
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	The mill conducted the weighbridge calibration on annually basis base on applicable laws and regulations. Reviewed the latest calibration and stamping as follows: 1. Serial no. C 016301909, DE2 005165-005166 with safety sticker no. DE18 000324 dated 21/10/2020 2. Serial no. C 01264406 KK, DE2 005163-005164 with safety sticker no. DE18 000323 dated 21/10/2020	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	No independent smallholders within Elphil POM certification unit.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	No independent smallholders within Elphil POM certification unit.	Complied
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 -	Not applicable as the mill did not receive FFB from any smallholder.	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	Not applicable as the mill did not receive FFB from any smallholder.	Not Applicable

	competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Not applicable as the mill did not receive FFB from any smallholder.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Not applicable as the mill did not receive FFB from any smallholder.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Not applicable as the mill did not receive FFB from any smallholder.	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. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity union membership, political affiliation or age. The policy has been briefed to all the workers on 15/03/2021 in Elphil POM. The policy could be downloaded from http://www.simedarbyplantation.com/sustainability/human-rights-charter .	Complied

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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>Interviewed with the workers comprises of different gender and nationalities as well as the parolees confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability.</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>Sime Darby Plantation has developed a Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability and the leadership quality of the worker. The recruitment of foreign workers is through Human Resource Department in HQ based the regulation requirements. For local workers, the operating units will be announced to all the workers regarding job vacancy during morning muster and they as the medium to advertise the job vacancy to their family and friends. They also displayed job vacancy advertisement in front of the mill. Medical test will be required for all the workers prior to start work.</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>Elphil Estate has conducted a Female Workers Medical Assessments to monitor on the pregnancy among the female workers. This is to ensure no chemical handling or hazardous work to be carried out by the pregnant women. The management is respecting the rights of the pregnant women and ensure they are being offered with the safe job during their pregnancy period.</p>	Complied
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>Sime Darby Plantation has developed Gender Committee Handbook, First Edition for implementation framework and guidelines for the setting up of Gender Committee within each operating unit. Gender committee meeting shall meet once every 3 months/ quarterly for performance evaluation and activities planning as per the handbook. Grievance reporting procedure for gender was developed. Any cases must be reported to Social & Environment Projects Unit of the PSQM Department. Incident report template was established.</p>	Complied

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		<p>Gender committee was established in Elphil POM and Elphil Estate and seen the organization chart of the committee. Meeting was conducted at the set frequency and the last meeting was carried out on 12/03/2021. New mother assessment was briefed to the female workers during the meeting. Needs of the new mother will be assessed and provided accordingly if necessary. Female workers medical assessment 2021 was carried out to monitor if there is any female worker pregnant. There was one new mother found in Elphil POM with no special needs requested. There is no new mother in the Ephil Estate. No issue related to sexual harassment or violence has reported as verified through the previous meeting minutes and interviewed with the committee.</p> <p>The last meeting held on 08/03/2021 in Kamuning Estate with total 19 attendees and 06/03/2021 in Kinta Kellas Estate. Issues raised during the meeting were incorporated into the management plan dated 16/03/2021 with proposed action plan in Kamuning Estate and 15/03/2021 in Kinta Kellas Estate.</p> <p>Interviewed with the female workers confirmed that the company provided opportunities for them to speak and job transfer. No discrimination from the management.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope. - Minor compliance -</p>	<p>Reviewed on the total 46 payslips (June 2020, August 2020, December 2019 and February 2020) in whole SOU 3 Elphil POM and supply bases which consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination. Same allowance is given to all the workers such as phone allowance.</p>	Complied

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).			
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 have signed on the employment contract/ extension contract (foreign worker) or offer letter (local worker) prior to work. The contract is in their national languages such as Bahasa Malaysia, English and India. All the terms and conditions were clearly outlined in the contract and briefed to all the workers before they signed the contract during induction training. Total 46 sampled of the employment contracts were reviewed.</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 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>	<p>Sampled total 46 employment contracts and payslips (June 2020, August 2020, December 2019 and February 2020). It has clearly stated that the payment and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice) in the employment contract or offer letter.</p>	Complied
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>Sime Darby Plantation has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for the deduction of salary for all the estates and mills in Peninsular Malaysia as below:</p> <ol style="list-style-type: none"> 1. Ref. No.: BHG.PU/9/129 JLD37(53) dated 06/07/2017 for electricity bill. <p>Elphil POM has obtained approval from Jabatan Tenaga Kerja Negeri Perak for the following:</p> <ol style="list-style-type: none"> 1. Ref.: (13)JTK.PK.(1)PMT/SEK.60/10803 dated 14/08/2012 for overtime limit to maximum 130 hours. 2. Ref.: (14)JTK.PK.(1)PMT(SEK.34)10803 dated 14/08/2012 for female to work at night from 10pm to 5am. 	Complied

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		<p>Elphil Estate has obtained approval from Jabatan Tenaga Kerja Negeri Perak for the following:</p> <ol style="list-style-type: none"> 1. Ref.: JTK.PK.(1)PMT(SEK.24)10803 Jld.3(10) dated 25/07/2017 for deduction of wages for temple fund (RM 5 and RM 10). 2. Serial No.: P.P.3/7/0111 effective September 2005 for deduction of wages for mosque fund. <p>Consent letters that signed by the workers for overtime and female works at night were sighted.</p>	
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>The workers live in the housing complex of the mill and estate are provided with free housing facilities, water supply and medical support. Facilities such as mosque, temple and sundry shops were available in the housing complex.</p> <p>The mill takes initiative to tarmac the road to workers’ quarter and to supply furniture such as mattress and cupboard to workers’ quarters. Seen the budget 2021 and CAPEX 2021 which allocated for the upgrading work.</p> <p>Refer to the Inter-office mail (Ref. No.: CEO/060/12/2020) dated 29/12/2020 where the company is raising the standards of employee housing & amenities and enhancing employees’ welfare. 3 types of linesite inspection will be carried out. Inspection will be carried by Medical Assistant on weekly basis, bi-weekly by Workers’ Representative and quarterly by the Employees Welfare Committee.</p> <p>Linesite inspection was conducted once every two weeks by the Assistant Manager/ Quality Assurance Officer/ Medical Assistant in Elphil POM using the Housing Complex/ Nest/ Community Hall Inspection Checklists. The las inspection was conducted on 02/03/2021 in Elphil POM.</p>	Complied

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		<p>Elphil Estate has housing complex at 3 divisions, Main Division, Plang Division and Kamiri Division. Linesite inspection was carried out on all divisions on weekly basis. Seen the last inspection done on 15/03/2021 by the Medical Assistant. Linesite visit found that the surrounding of housing complex is clean and well maintained. Rubbish are collected by contractor.</p> <p>There are two divisions which consisted of housing complex in Kamuning Estate, Main Division and Changkat Salak Division. Medical Assistant has carried out linesite inspection on weekly basis in both divisions. The last inspection was carried out on 13/03/2021. Site visit to the housing complex found the surrounding was cleaned. There were houses newly painted and the estate in the progress to install fan at each of the bedroom. Seen the invoice# INV-03743 dated 14/12/2020 for the purchase of 30 units of fan.</p> <p>Seen all the inspection records in Kinta Kellas Estate and the last inspection done by Medical Assistant was on 15/03/2021. Site visit to the linesite found satisfactory.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>All the workers have provided with 10kg of rice once every two months as per company's policy. Seen the records of distribution of rice for January & February 2021. Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where sundry shops are available inside the estates. Besides, the estates are neighbouring to the small town where they can easily access.</p>	Complied
6.2.6	<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>Sime Darby Plantation has established the prevailing wage calculation to include all the in-kind benefits provided to the workers for SOU 3 Elphil Complex. Sampled the prevailing wages for benefit of Health (Medical cost, clinic, transport, staff) is RM 16.69 and</p>	Complied

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<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>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 	<p>Facilities (public building maintenance and utilities) is RM 31.75. The prevailing wages is more than the Minimum Wage Order 2020.</p>	
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	<ul style="list-style-type: none"> • 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>All the core works are performed by permanent and full-time employees in SOU 3 Elphil POM and supply bases. No contract worker was employed.</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>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They respect the rights of their employees to form and join unions and bargain collectively.</p> <p>The policies were communicated to workers on 15/03/2021 in Elphil POM, 14/10/2020 in Elphil Estate, 22/01/2021 in Kamuning Estate and 20/01/2021 in Kinta Kellas Estate.</p>	Complied
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>NUPW Committee was established in Elphil POM and the last meeting was conducted on 09/09/2020 with total 9 attendees. Issues were raised during the meeting and recorded in the meeting minutes. Management plan was developed for the issues raised by the NUPW representatives and action has been taken accordingly.</p>	Complied

	<p>- Minor compliance -</p>	<p>Interviewed with the NUPW representatives confirmed that the issues raised during the meeting were resolved. On top of that, they informed that management would take immediate action for any issues raised.</p> <p>There is NUPW committee established in Elphil Estate and meeting was carried out with the management to discuss workers' issues. The last meeting was conducted on 21/01/2021 in main division and 30/12/2020 in Kamiri division. Meeting minutes was sighted. There were some issues raised during the meeting. Issues were incorporated into the management plan for monitoring.</p> <p>NUPW committee has held meeting in Kamuning Estate and the committee formed by representatives of male and female. The last meeting was conducted on 13/03/2021 and there were issues raised by the committee. All the issues raised were incorporated into the social management plan dated 16/03/2021 with proposed action plan and status of the issue if it is resolved. Verified some action taken by the management such as the management has issued compliance instruction letter to the sundry shops' owners related to the workers complaint on the price of goods in sundry shops.</p> <p>Kinta Kellas Estate has established NUPW committee and meeting was last conducted on 26/02/2021. Meeting minutes was sighted with concerns raised by the committee. The management has responded with the proposed action and target date to be completed. The concerns were incorporated into social management plan to monitor the progress of the concerns raised. For eg: the worker requested for rack in mosque. The management has built one rack for the mosque usage on 04/03/2021. Seen the photo evident of the rack available in the mosque.</p>	
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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>Interviewed with the NUPW representatives and the workers confirmed that the election of the representatives were elected freely by the workers without any interference of management.</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>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. They are eradicating child labour in all their supply chain and not employ anyone under age of 18 years.</p> <p>Sampled of the agreement with contractor, Company No.: 72668-U dated 01/05/2020 where the contract has clearly stated that the contractors shall comply with all Labour Act 1955 and requirement of RPSO/ MSPO Certification.</p>	Complied
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>	<p>Workforce Management Unit has developed SOPP under Clause 3.1.13 LR13 – Recruitment Drive & Interview/ Selection of Foreign Workers where the minimum requirement of the age is 18 years old. Besides, Guideline on the Recruitment of Local Workers dated 07/12/2020 has stated the applicant of workers must be above 18 years of age. Age screening is based on identification documents and/ or passport and from the stated date of birth. The local employees have to submit a photocopy of identification card during</p>	Complied

		application of job to the management for verification purpose. Verified the records in the New Recruitment's file.	
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders.	Complied
6.4.4	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. - Minor compliance -	The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They seek to create a working environment with zero tolerance for sexual harassment and abuse and in which violence is never used to resolve issues or conflict. The policies were communicated to workers on 15/03/2021 in Elphil POM, 14/10/2020 in Elphil Estate, 22/01/2021 in Kamuning Estate and 20/01/2021 in Kinta Kellas Estate.	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They facilitate opportunities for advancement for their employees,	Complied

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		<p>especially women, by removing barriers to progress and respecting reproductive and maternal rights.</p> <p>The policies were communicated to workers on 15/03/2021 in Elphil POM, 14/10/2020 in Elphil Estate, 22/01/2021 in Kamuning Estate and 20/01/2021 in Kinta Kellas Estate.</p>	
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>	<p>Briefing of the new mother assessment was conducted during the Gender Committee meeting in Elphil POM and Elphil Estate. The mill management has carried out monitoring of female workers if she is pregnant. There was one new mother identified in Elphil POM and there is no special request from her as refer to Assessment for New Mothers (with infants under 24 months) FY2021 conducted on 09/03/2021. She has been transferred from laboratory to office work for light duty. Seen the letter of transferred dated 28/01/2020 and she has agreed for the job transferred.</p> <p>There was assessment for new mothers conducted on 03/02/2021 and 08/03/2021 in Kamuning Estate for one the new mother who just delivered and one new mother who is currently pregnant for 5 months. Their needs are to have time for breastfeed and to go to the clinic for check-up. The management has agreed to give time for breastfeed and go to clinic for check-up.</p> <p>As of 06/03/2021, there was no new mother in Kinta Kellas Estate verified through assessment for new mother and interviewed with the female workers.</p>	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>	<p>Sime Darby Plantation has developed Gender Committee Handbook, First Edition for implementation framework and guidelines where grievance reporting procedure for gender was developed. Any cases must be reported to Social & Environment Projects Unit of the PSQM Department. Incident report template was established. Flowchart and Procedure on Handling Social Issues, version 1, dated</p>	Complied

		<p>01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p> <p>A Gender Complaint Book was implemented and social media such as WhatsApp group was established in Elphil POM to monitor if there is any cases reported.</p>	
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<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 • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages 	<p>Interviewed with the workers confirmed that no forced and trafficked labour in SOU 3 Elphil operating units. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. They have voluntarily surrendered their passport to the management for safekeeping with consent letter signed by the foreign workers. Overtimes was monitored by the company and the workers are giving freedom to choose to overtime and resign. There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed.</p>	<p>Complied</p>

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	<p>- Critical (Major) compliance -</p>	<p>The mill workers have signed on the Borang Permohonan Kerja/ Kerja Lebih Masa Pada Hari Rehat/ Cuti Am and agreed to work on rest day and overtime.</p>	
<p>6.6.2</p>	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. - Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby’s Human Rights Charter revised 2020 and can be easily access via www.simedarbyplantation.com where they committed as below:</p> <ul style="list-style-type: none"> a) Providing equal opportunity b) Respecting freedom of association c) Eradicating any form of exploitation d) Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs e) Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. <p>All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow joining NUPW freely. No contract substitution has occurred through interviewed with the workers.</p> <p>Prison labour was employed by the Sime Darby Plantation Berhad where the prison labour must fill in the questionnaire for participation of Parole prior to work. All the terms and conditions as well as the benefits of the prison labour were similar to the normal labour in the estate. This has been verified with the offer letter</p>	<p>Complied</p>

		signed and the payslips. Cross check interviewed with the parolees confirmed that no discrimination from the management.																					
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.																							
6.7.1	<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 3 has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter signed by the Regional CEO. The Estate Manager has appointed the medical Assistant as person responsible for Safety and health issue in the estate and Mill.</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> <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> </tr> </thead> <tbody> <tr> <td>Elphil POM</td> <td>20/01/2020</td> <td>27/07/2020</td> <td>28/09/2020</td> <td>21/12/2020</td> </tr> <tr> <td>Elphil Estate</td> <td>Postponed due to MCO as per memo dated 18/03/2020</td> <td>Postponed due to MCO as per memo dated 18/06/2020</td> <td>29/09/2020</td> <td>18/01/2021</td> </tr> <tr> <td>Kamuning Estate</td> <td>25/02/2020</td> <td>12/06/2020</td> <td>24/09/2020</td> <td>23/12/2020</td> </tr> </tbody> </table>		1	2	3	4	Elphil POM	20/01/2020	27/07/2020	28/09/2020	21/12/2020	Elphil Estate	Postponed due to MCO as per memo dated 18/03/2020	Postponed due to MCO as per memo dated 18/06/2020	29/09/2020	18/01/2021	Kamuning Estate	25/02/2020	12/06/2020	24/09/2020	23/12/2020	Complied
	1	2	3	4																			
Elphil POM	20/01/2020	27/07/2020	28/09/2020	21/12/2020																			
Elphil Estate	Postponed due to MCO as per memo dated 18/03/2020	Postponed due to MCO as per memo dated 18/06/2020	29/09/2020	18/01/2021																			
Kamuning Estate	25/02/2020	12/06/2020	24/09/2020	23/12/2020																			

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		Kinta Kellas Estate	04/03/202 0	02/06/202 0	07/09/202 0	03/12/202 0	
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><u>Elphil POM</u></p> <ol style="list-style-type: none"> 1. The mill has established Emergency Response Team as per appointment letter dated 16/12/2020. Latest ERP training was conducted on 09/12/2020 for oil spillage and 18/11/2020 for firefighting. 2. The mill has trained 4 competent first aider. Reviewed the First Aider Certificate no. BOFA/19/000552, BOFA/19/000553, BOFA/19/000554, and BOFA/19/000555 valid till 15/10/2022. 3. The mill monitored the first aid on monthly basis. Reviewed the first aid monitoring form for the month of November 2020, December 2020, January 2021 and February 2021. 4. The mill maintain the records of accidents including JKPP 6 forms reported to DOE, medical leaves certificates, accidents investigations reports and HIRARC review. The accidents occurrence were reported to the Headquarters through Rapid 4 systems and DOSH by submitting the JKPP 6 form through MyKKP system. Reviewed the document for accident occur on 07/04/2020 and 30/03/2020. <p><u>Elphil Estate</u></p> <ol style="list-style-type: none"> 1. The estate conducted first aid monitoring on monthly basis. The monitoring checked on the items and expiry date. Reviewed the monitoring records for month of October, November and 					Complied

		<p>December 2020. 15 first aid box were present at the estate. latest First Aid training was conducted on 15/03/2021.</p> <ol style="list-style-type: none"> 2. The estate maintain the records of accidents including JKKP 6 forms reported to DOE, medical leaves certificates, accidents investigations reports and HIRARC review. The accidents occurrence were reported to the Headquarters through Rapid 4 systems and DOSH by submitting the JKKP 6 form through MyKKP system. Reviewed the document for accident occur on 30/09/2020. <p><u>Kamuning Estate</u></p> <ol style="list-style-type: none"> 1. The estate has established Emergency Response Team lead by the Estate Manager. The team divided into 5 section which is Workplace Inspection, Accident Investigation, HIRARC, ERP/Environment and Training. 2. The estate continuously provided training to the workers on emergency and first aid. Latest training was conducted as follows: <ol style="list-style-type: none"> a. Fire drill training dated 11 and 13/03/2021 b. First Aid training dated 03 and 05/03/2021 c. HIRARC training dated 03/03/2021 3. The estate monitored the first aid box on monthly basis. Reviewed the monitoring records for the month November and December 2020. 4. The estate maintained the investigation records for occupational accident and poisoned/disease occur in the estate. Reviewed the records for occupational poisoned/disease occur on 22/08/2020. Document such as Medical report, incident investigation reports, DOSH investigation reports, JKKP 7 and JKKP 10 reports were available for review in the estate. <p><u>Kinta Kellas Estate</u></p>	
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		<ol style="list-style-type: none"> 1. The estate have in placed 15 units of first aid box. The monitoring was conducted by the Medical Assistant on monthly basis. Latest monitoring was conducted on 27/2/2021. 2. The estate has established emergency response team lead by the Estate Manager as chairman. The team was divided into 3 section which is Fire and Safety, Accident Investigation and First Aid and Medivec Training. 3. The estate continuously provided training to the workers on emergency and first aid. Latest training was conducted as follows: <ol style="list-style-type: none"> a. First Aid Training dated 05/02/2021 b. Fire drill training dated 09/10/2020 	
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 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>The mill and estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) dated 17/03/2008.</p> <p><u>Elphil POM</u> The mill recorded the PPE issue on personal basis. Reviewed the PPE issuance records for employee with ID no. 46618, 158960, 143695, 49835 and 145437.</p> <p><u>Elphil Estate</u> The estate recorded the PPE issuance in PPE record form by type of PPE. Reviewed the PPE issuance records for 3M face mask, cartridge 3311K-SS, safety glasses and apron. Noted during interview with harvester, they were provided with PPE such as safety helmet and wellington boots free of charge by the estate.</p> <p><u>Kamuning Estate</u> The estate maintained the PPE issuance records in PPE and Tolls record book. Reviewed the PPE issue for employee with ID no. 155901, 134400, 141107 141109 and 141112.</p>	Complied

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		<p><u>Kinta Kellas Estate</u> The estate maintain the records of PPE issuance in PPE Distribution form. Reviewed the PPE issue for items mask 3M 8210, 3M nitrile glove, rubber boots and apron. Noted during interview with trunk injector, noted that they have been provided with adequate PPE and training before conducted the work.</p>	
<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. - 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><u>Elphil POM</u> Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual Caruman" for December 2020, January and February 2021 for contribution of 89 employees including staff.</p> <p><u>Elphil Estate</u> Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual Caruman" for contribution for the month of December 2020 for 177 employees and January 2021 for of 178 employees</p> <p><u>Kamuning Estate</u> Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual Caruman" for contribution for the month of January and February 2021 for contribution of 308 and 310 for both respective month. Reviewed the evidence of SOCSO claim for accident 06/03/2020. The application for form 34: Notice Details and Benefits Claim have been submitted and received by SOCSO on 10/04/2020. The benefit payment have been done directly by SOCSO to the employee.</p>	<p>Complied</p>

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		<p><u>Kinta Kellas Estate</u> Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual Caruman" for contribution for the month of January 2021 for 109 employee and February 2021 for 106 employee.</p> <p>Reviewed the evidence of SOCSO claim for accident 18/11/2020. The application for form 34: Notice Details and Benefits Claim have been submitted and received by SOCSO on 24/11/2020. The benefit payment have been done directly by SOCSO to the employee.</p>																
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2020 as reported to DOSH as follows:</p> <table border="1"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Elphil POM</td> <td>5</td> <td>42</td> </tr> <tr> <td>Kamuning estate</td> <td>6</td> <td>174</td> </tr> <tr> <td>Elphil Estate</td> <td>1</td> <td>93</td> </tr> <tr> <td>Kinta Kellas</td> <td>2</td> <td>46</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	Elphil POM	5	42	Kamuning estate	6	174	Elphil Estate	1	93	Kinta Kellas	2	46	Complied
Operating units	Accident Cases	LTA																
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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.																		
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been	Complied															

		<p>no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estates visited has established IPM program. The plan was reviewed on annually basis. The IPM consist of Planting Beneficial Plant, Rat Baiting Applications and Barn Owl Census. Sighted the sampled implementation of the plan as follows:</p> <p><u>Elphil Estate</u></p> <ol style="list-style-type: none"> 1. The estate in progress to reduce the Barn Owl Box Ratio gradually from 1:30 ha to 1: 10 ha. Currently, the ratio of BOB was at 1:17.13 ha. 2. The barn owl census was conducted twice a year. Latest census was conducted on January 2021. Occupancy status at Kamiri Division recorded at 39.47%. 3. Rat baiting were conducted two campaign per year. Latest campaign was applied in October 2020. At Plang Division, the application was at 2 – 3 rounds with acceptance level at below 20%. <p><u>Kamuning Estate</u></p> <ol style="list-style-type: none"> 1. Rat baiting were conducted two campaign per year. Latest campaign was applied in September to October 2020. The application was at 2 – 3 rounds with acceptance level at below 20%. 2. The barn owl census was conducted twice a year. Latest census was conducted on September 2020. Ratio of barn owl box recorded at 1:43.42 ha with occupancy rate at 53%. <p><u>Kinta Kellas Estate</u></p> <ol style="list-style-type: none"> 1. The barn owl census was conducted twice a year. FY 2020 census was conducted on August 2020 with occupancy rate at 61%. Latest census was conducted in February 2021 with occupancy rate at 50%. 	
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		<p>2. The estate beneficial planting recorded at 1.08 dm/hectare. Among the beneficial plant planted in the estate such as Tunera subulata, Cassia cobanensis and Antigonan leptopus.</p> <p>3. As the estate experience bagworm attack, they conducted bagworm census before conducted any treatment required. The census was conducted at interval of 14 days. Latest census was conducted in March 2021.</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 estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p> <p>In SOU 3, 4 plant species were used for IPM such as Tunera subulata, Cassia cobanensis, Antigonan leptopus and Euphorbia heterophylla.</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>No evidence and records of fire usage for pest control at all estate visited.</p> <p>Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 02/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest: "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through: ix. Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as protective firefighting measures in and around our operation."</p>	Complied
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>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</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01/07/2011. Selected products are specific to the target pest, weed and disease. Some of recommended pesticides are: Immature planting (sample) i. General weeds : Glyphosate ii. Pennisetum polystachion : Metsulfuron Methyl iii. Stenochlaena palustris : Sodium chlorate</p> <p>Mature planting i. Grass weed and Asystasia : glyphosate & 2,4-D amine The selection is also evaluated by the agronomist during his visit to the estate.</p>																																													
<p>7.2.2</p>	<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. - Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Sighted the sampled records of pesticides usage per ha at estates visited FY 2020 as follows:</p> <table border="1" data-bbox="1137 946 1865 1364"> <thead> <tr> <th>Month</th> <th>Elphil</th> <th>Kamuning</th> <th>Kinta Kellas</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>1.51</td> <td>0.392</td> <td>0.21</td> </tr> <tr> <td>Feb</td> <td>0.65</td> <td>0.237</td> <td>0.22</td> </tr> <tr> <td>Mar</td> <td>1.74</td> <td>1.040</td> <td>0.03</td> </tr> <tr> <td>Apr</td> <td>0.71</td> <td>1.335</td> <td>0.15</td> </tr> <tr> <td>May</td> <td>2.09</td> <td>2.112</td> <td>0.16</td> </tr> <tr> <td>Jun</td> <td>1.95</td> <td>0.494</td> <td>1.10</td> </tr> <tr> <td>Jul</td> <td>3.14</td> <td>0.437</td> <td>0.12</td> </tr> <tr> <td>Aug</td> <td>2.69</td> <td>0.357</td> <td>0.00</td> </tr> <tr> <td>Sep</td> <td>2.47</td> <td>0.177</td> <td>0.15</td> </tr> <tr> <td>Oct</td> <td>4.35</td> <td>0.274</td> <td>0.47</td> </tr> </tbody> </table>	Month	Elphil	Kamuning	Kinta Kellas	Jan	1.51	0.392	0.21	Feb	0.65	0.237	0.22	Mar	1.74	1.040	0.03	Apr	0.71	1.335	0.15	May	2.09	2.112	0.16	Jun	1.95	0.494	1.10	Jul	3.14	0.437	0.12	Aug	2.69	0.357	0.00	Sep	2.47	0.177	0.15	Oct	4.35	0.274	0.47	<p>Complied</p>
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		Nov	2.91	0.295	0.22	
		Dec	2.21	0.282	0.20	
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. 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 plant beneficial plant ii. To increase ratio of BOB from ratio 1:30 to 1:10 iii. Planting Legume Cover Crop 				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> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 02/12/2019 and Responsible Agriculture Charter under section 3.3: Protect and disclose environmental impacts and minimise resource use stated:</p> <p>‘We aim to minimise our foot print and continuously reduce our use of resources through:</p> <ul style="list-style-type: none"> 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>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> 				Complied

		<p>In Kinta Kellas Estate, control pesticides Acephate under class III was use in trunk injection operation to control Bagworm as replacement for Monocrotophos under class Ib. The estate has acquired purchasing permit for Acephate from Dept. of Agriculture as per permit no. PRK/2020/ACP/066(G) dated 08/10/2020 for purchasing of 150 kg of Acephate.</p>	
<p>7.2.6</p>	<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. - 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. The training was conducted by the personnel with knowledge on pesticide application such as Estate Manager, Asst. Manager and pesticide supplier. Reviewed the training records as follows:</p> <p><u>Elphil Estate</u></p> <ol style="list-style-type: none"> 1. Chemical safety handling and Ergonomic training dated 15/11/2020 2. Chemical Health Risk Assessment briefing dated 30/09/2020 <p><u>Kamuning Estate</u></p> <ol style="list-style-type: none"> 1. Circle spraying training dated 11/12/2020 2. Circle spraying training dated 11/11/2020 3. PPE and chemical handling training dated 08/10/2020 <p><u>Kinta Kellas Estate</u></p> <ol style="list-style-type: none"> 1. Trunk Injection training dated 27/02/2021 2. Interpump maintenance and PPE training dated 23/02/2021 3. Spraying method, SOP and PPE training dated 02/06/2020 4. Rhinoceros Beetle SOP and PPE training dated 24/05/2020 5. Chemical handling and Scheduled Waste training dated 20/05/2020 6. Rat baiting method training dated 02/05/2020 	<p>Complied</p>

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7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices. - 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. - Minor compliance -</p>	<p>The empty chemical containers are categorised as non-scheduled wastes after the process of triple rinsing is undergone. The practice was based on the triple rinse procedure. The containers were mainly disposed through recycling companies (e.g. Pentas Flora, SS Setia, Edsha Solution). The following receipts of transaction verified:</p> <ul style="list-style-type: none"> - Elphil Estate: No. A03810, dated 05/03/2021, 260 kg - Kamuning Estate: No. 1834, dated 11/01/2021 - Kamuning Estate: No. 1717, dated 28/02/2020 - Kinta Kellas Estate #20210208120CR5NM – SW409, dated 08/02/2021 	Complied
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. - Critical (Major) compliance -</p>	<p>No aerial spray conducted at all operating units in SOU 3.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -</p>	<p>The estates visited has conducted CHRA in August 2020 by assessor with DOSH reg. no. HQ/09/ass/00/124. Refer CHRA report no. HQ/09/ASS/00/124-2020/0035. In the report, the assessor recommend "to conduct medical surveillance for exposure to organophosphate for workers working within one year that have not been for medical surveillance but not on annual basis".</p> <p>Elphil Estate FY 2020, the estate has send 32 workers for medical surveillance on 21/08/2020. The surveillance was conducted by OHD with reg.</p>	Complied

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		<p>no. HQ/11/DOC/00/200. All workers were found fit to work as chemical handlers. FY 2021, 4 workers were send for surveillance and found fit to work as chemical handlers. Additionally, the estate conducted the health surveillance for chemical handlers on monthly basis. reviewed the surveillance records for the month of June and July 2020.</p> <p><u>Kamuning Estate</u> Latest medical surveillance was conducted on 05/03/2021 for 31 workers involve in chemical handlers by OHD with reg. no. HQ/11/DOC/00/200. All workers were found fit to work as chemical handlers.</p> <p><u>Kinta Kellas Estate</u> Latest medical surveillance was conducted on 08/03/2021 by OHD with reg. no. HQ/08/DOC/00/649 for 9 workers who involve in chemical handing. The result has yet to be received by the estate during the audit.</p>	
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. - 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 on 18/08/2020. The memo has been displayed on the notice board at few strategic place in the estate.</p>	Complied
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
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. - Minor compliance -</p>	<p>Wastes management plan is developed through the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through landfill.</p>	Complied
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>Generally, the workers have demonstrated good understanding in proper disposal of wastes. The visited labour quarters were</p>	Complied

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	<p>- Minor compliance -</p>	<p>observed to be in clean condition. Wastes were properly disposed as mentioned in Indicator 7.3.1.</p> <p>SW disposed through licensed contractors which were verifiable through eSwis. The latest notification to DOE on types of scheduled waste was on 23/01/2021. Examples of Consignment notes verified:</p> <p><u>Elphil POM</u> #20210309177ALRUG – SW322 - dated 09/03/2021 #2021030917HMZ3TN – SW409 - dated 09/03/2021 #2021030917JB1LR9 – SW410 - dated 09/03/2021 #2021030917GCFSMD – SW418 - dated 09/03/2021 #2020092812BDQRW9 – SW305 - dated 28/09/2020 #2020092812TIMK4X – SW306 - dated 28/09/2020 #2020092812GPIT3L – SW322 - dated 28/09/2020 #2020092812DESB5F – SW409 - dated 28/09/2020 #2020092813SDG31M – SW410 - dated 28/09/2020 #2020092813IVEFPS – SW418 - dated 28/09/2020</p> <p><u>Elphil Estate</u> #2021031018245YXE – SW305-dated 10/03/2021 #2021031018UI3TEB – SW306-dated 10/03/2021 #2020050513MJQYI8 – SW404-dated 05/05/2020</p> <p><u>Kamuning Estate</u> #2021031119BH8WE2 – SW305-dated 17/03/2021 #2021031119BNXFCV – SW306-dated 17/03/2021 #2021030815Y40HCB – SW404-dated 08/03/2020</p> <p><u>Kinta Kellas Estate</u> #2021020216HF1S7J– SW305-dated 02/02/2021 #20210202160HBAG4– SW306-dated 02/02/2021 #2021020915R9WJ70– SW404-dated 09/02/2021</p>	
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		<p>Landfill is also used for disposal of wastes guided under Operational Control Procedure, Landfill Management in Estate [doc. No.: SD/SDP/PSQM(ESH)/203-EN7, rev. 0, dated 13/03/2017].</p> <p>At Elphil Estate, domestic wastes were no longer disposed in the landfill starting from March 2021. The estate disposes its domestic wastes to the Kuala Kangsar Town Council designated landfill. A contractor was hired to transport the wastes from the line-site the landfill. Contract agreement between KRM Mawar Murni Enterprise and Sime Darby Plantation Bhd., Elphil Estate, dated 01/03/2021 was verified.</p> <p>At Kamuning Estate, the domestic wastes have been disposed to MPKK designated landfill all the while.</p> <p>At Kinta Kellas Estate, landfill located in the field is used to dispose domestic wastes. Based on site visit, it was observed that the landfill was well maintained and no toxic wastes seen.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	There was no wastes disposal by using open fire observed during the site visits.	Complied
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 -	ARM Section 8 covers the procedure for fertiliser application for both immature and mature. The procedure gives the guideline type of fertilisers to be used, timing to apply, dosage and placement.	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 -	Periodic foliar sampling analysis was last conducted in early 2021, to monitor the changes in nutrient status. The results of the analysis were used by the agronomist for their recommendation for fertilisers application programmes in Jul 2021 to Jun 2022. Among the foliar sampling reports verified are:	Complied

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		<ul style="list-style-type: none"> - Elphil Estate: Report ref. no. P376/2020, P377/2020, P378/2020, dated 22/10/2020 - Kamuning Estate: Report ref. no. P35/2021, dated 08/02/2021, P52/2021, dated 09/02/2021, P57/2021, P72/2021 and P74/2021, dated 22/02/2021 - Kinta Kellas Estate: P379/2020, dated 22/10/2020 <p>Soil analysis was done once in 5 years in accordance to procedure. Soil Analysis Test was last conducted as follows:</p> <ul style="list-style-type: none"> - Elphil Estate: Report ref. no. S40/2019, dated 17/04/2019 - Kamuning Estate: Report ref. no. S41/2019, dated 11/04/2019 					
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>EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Elphil POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/Ha.</p>	Complied				
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilisers input is recorded in store issue notes and manuring record book, which have the information about type of fertiliser, quantity (bags and kg), dates of application and field number. Verification of records confirmed that the applied fertilisers were tally with the agronomist recommendation.</p>	Complied				
<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>							
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series and terrain maps were available at all the estates. Based on the maps, there are no peat soil or soil categorised as marginal or fragile. The soil series at the estates are as follows:</p> <table border="1" data-bbox="1137 1225 1928 1353"> <thead> <tr> <th>Estate</th> <th>Soil Series</th> </tr> </thead> <tbody> <tr> <td>Elphil</td> <td>Bungor, Durian, Holyrood, Klau, Langkawi, Malacca, Munchong, Rengam, and unclassified</td> </tr> </tbody> </table>	Estate	Soil Series	Elphil	Bungor, Durian, Holyrood, Klau, Langkawi, Malacca, Munchong, Rengam, and unclassified	Complied
Estate	Soil Series						
Elphil	Bungor, Durian, Holyrood, Klau, Langkawi, Malacca, Munchong, Rengam, and unclassified						

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		<table border="1"> <tr> <td>Kamuning</td> <td>Jerangau, Rengam, Munchong, Bungor, Local Aluvium, Langkawi, Harimau, Durian, Tavy Shallow</td> </tr> <tr> <td>Kinta Kellas</td> <td>Bungor, Malacca, Riverine Alluvium, Munchong, and Durian</td> </tr> </table>	Kamuning	Jerangau, Rengam, Munchong, Bungor, Local Aluvium, Langkawi, Harimau, Durian, Tavy Shallow	Kinta Kellas	Bungor, Malacca, Riverine Alluvium, Munchong, and Durian	
Kamuning	Jerangau, Rengam, Munchong, Bungor, Local Aluvium, Langkawi, Harimau, Durian, Tavy Shallow						
Kinta Kellas	Bungor, Malacca, Riverine Alluvium, Munchong, and Durian						
		Maps that show steep terrain were also available for all the estates which were prepared by the R&D-Plantation Research and Advisory Dept., Precision Agriculture Unit (SMBH).					
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	Ref.: ARM Section 4, Land Preparation, Clause 8.4 which reads "Areas with greater than 25-degree slope should not be planted and best left for biodiversity purposes...". The area which has more than 25 degree will be excluded from being replanted in future. For hilly area between 9 - 25-degree, ARM is referred to as a management strategy to minimise soil erosion.	Complied				
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	Based on the field visit, the areas which has been identified having slope more than 25°, were left undeveloped. The visited areas are as follows: - 4°50'59" N 101°5'54" E, Elphil Estate - 4°48'57" N 101°3'11" E, Kamuning Estate	Complied				
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 -	Not applicable as there is no new planting at all the estates.	Not Applicable				
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.	Not applicable as there is no new planting at all the estates.	Not Applicable				

	- Minor compliance -		
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Not applicable as there is no new planting at all the estates.	Not Applicable
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Not applicable as there is no new planting at all the estates.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. 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). - Minor compliance -	Not applicable as there is no new planting at all the estates.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Not applicable as there is no new planting at all the estates.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Not applicable as there is no new planting at all the estates.	Not Applicable
7.7.5	(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, 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	Not applicable as there is no new planting at all the estates.	Not Applicable

	<p>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>		
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>	Not applicable as there is no new planting at all the estates.	Not Applicable
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>- Critical (Major) compliance -</p>	Not applicable as there is no new planting at all the estates.	Not Applicable
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<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>Water management and action plan at all the sampled estates for year 2021 were available. Among the objectives of the management plan are:</p> <ul style="list-style-type: none"> • water contingency during dry spell • to reduce wastage of water • to prevent pollution <p>Among the action plan established to achieve the above objectives are:</p>	Complied

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	<p>- Minor compliance -</p>	<ul style="list-style-type: none"> • To purchase water from the public domain supplier • To educate employees on water saving • To repair pipelines therefore reduce leakage • Rainwater harvesting • Minimise soil erosion during replanting • Maintaining riparian zones <p>The mill has documented its plans in Action Plan for Reduction of Water Usage, dated 08/01/2021. Among the plans are rainwater collection and dry cleaning (cleaning without using water).</p> <p>Workers quarters at the mill and estates have adequate access to clean water which were supplied by the public domain (Lembaga Air Perak).</p> <p>Some of the line-sites such as at Plang Division, Elphil Estate, the potable water supply is sourced from a tube well. The estate has a permit from Labour Dept. (permit no. 2018/0010), valid until 12/12/2020. The estate is in the midst of renewing the permit [ref.: letter dated 21/01/2021 from the Estate Manager]. Water analysis in accordance to Food Act 1983, 25th A Schedule, Standard of Water were conducted through an accredited laboratory (SAMM No. 293) on quarterly basis. Among the parameters tested are pH, Turbidity, Residual Chlorine (Free), Aluminium, total Coliform and Escherichia coli. The reports verified are as follows:</p> <ul style="list-style-type: none"> - Report No. BAG01643/1220F, dated 19/01/2021 – the total coliform result (28) was slightly above the standard limit (<10). Corrective/preventive action was conducted through the utilisation of form code: WQ-01/CPAR (1), dated 21/01/2021 - Report No. BAG00009/10/11/1020F, dated 18/11/2020 - Report No. BAG00177/8/9/0920F, dated 24/09/2020 	
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<p>7.8.2</p>	<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>- Report No. BAG01803/0221F, dated 08/03/2020</p> <p>Water courses and wetlands are protected as per documented Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table border="1" data-bbox="1137 523 1675 727"> <thead> <tr> <th>River width (m)</th> <th>Buffer zone width</th> </tr> </thead> <tbody> <tr> <td>> 40</td> <td>50</td> </tr> <tr> <td>20 to 40</td> <td>40</td> </tr> <tr> <td>10 to 20</td> <td>20</td> </tr> <tr> <td>5 to 10</td> <td>10</td> </tr> <tr> <td>< 5</td> <td>5</td> </tr> </tbody> </table> <p>Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/rivers, version 1, year 2008, issue no. 1, dated 01/11/2008.</p> <p>Based on verification at all the sampled estates, the riparian zones were satisfactorily maintained, and no evidence of agrochemicals application seen.</p> <p>The river water quality was analysed by an accredited lab (SAMM no. 030) for various parameters such as pH, BOD, COD, SS, AN, DO and P. Generally, the sampling points are located at the upstream, midstream and downstream of the rivers. The following reports were verified:</p> <p>Kamuning Estate #IE216/2021, dated 25/02/2021 #IE930/2020, dated 24/11/2020 #IE761/2020, dated 06/10/2020</p>	River width (m)	Buffer zone width	> 40	50	20 to 40	40	10 to 20	20	5 to 10	10	< 5	5	<p>Complied</p>
River width (m)	Buffer zone width														
> 40	50														
20 to 40	40														
10 to 20	20														
5 to 10	10														
< 5	5														

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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.</p> <p>- Minor compliance -</p>	<p>The mill applies the biological system with 14 ponds in series for its treatment of effluent. The mill is disposing its effluent through land application in the field. The quality of discharged effluent was analysed every month an accredited laboratory (SAMM No. 030) and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Last 12 months results were verified where highest BOD was 543 ppm while lowest was 96 ppm. The results complied with the regulated limit.</p> <p>Competent Person as required by legal was also verified. Currently, the responsibility is held by the assistant mill manager, Certificate No. CePPOME/211164, valid until 16/03/2021.</p>	Complied
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill continues to monitor its water use per tonne FFB processed which data obtained from flowmeters i.e. at mill process, boiler operation and fire hydrant. Based on the records, the mill has consumed:</p> <ul style="list-style-type: none"> - 1.12 m3/mt FFB for year 2020 - 1.12 m3/mt FFB for year 2021 as at January 	Complied
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>At the estates, the plan to optimise the usage of diesel is documented in the Energy Management Plan 2021. Among the action plans implemented are by doing regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. The fossil fuel consumption are recorded as part of monitoring.</p> <p>At the mill, the utilisation of fibre and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel. The use of fossil fuel by the mill recorded in year 2020 was 0.08 lt/mt FFB.</p>	Complied

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.			
7.10.1	<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.</p> <p>- Critical (Major) compliance -</p>	<p>Main sources of GHG emission identified were methane (CH₄) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO₂, SO_x and NO_x from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4.</p> <p><i>Based on verification of various records such as store issuance records and SAP system, most of the data was found to be accurate. However, at Kinta Kellas Estate, one type of fertiliser i.e. NK1 (417.85 mt) applied in the year 2020, was not included in the RSPO Palm GHG Calculator version 4. Thus, a critical non-conformance was raised.</i></p> <p>The mill has granted an approval from the DOE [ref.: AS(B) A31/152/000/055 Jld.19(16), dated 21/08/2020] to construct a biogas plant. This plan is an initiative to minimise GHG emission from the effluent treatment plant. The project is expected to started in April 2021.</p>	Non-compliance
7.10.2	<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).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable

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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>Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few.</p> <p>Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring for dust particulate. The mill has its monitoring system to report its significant pollutants and emissions from the operating units' activities for example monitoring stack emission from mill's boiler operation by competent consultant.</p> <p>The mill has conducted its stack sampling at regulated frequency (once a year). Based on the stack sampling reports [L-PG-AC2008CSD-0104, dated 25/08/2020], the emission from the chimney were reported to be 119.50 mg/m³ where the regulated limit i.e. 150 mg/m³.</p> <p>Annual Pollution Prevention Plans have also established and documented by the mill and estates, which were derived from the environmental aspects evaluation. Generally, the plans are focussing on mitigating pollution to water, land and air, e.g. POME furrow leakage, open burning at line-site, domestic wastes generation, bund rupture at ETP, generation of scheduled wastes, etc.</p>	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>Guided by SDPB ARM, preparation of replanting using fire is not allowed. Based on site visit at the latest replanting fields of the sampled estates, there was no trace of burning observed. Palm trunks were chipped and windrowed.</p>	Complied

<p>7.11.2</p>	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire detected, inform estate.</p> <p>Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data [ref.: http://www.simedarbyplantation.com/sustainability/hotspot-dashboard/]. The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.</p> <p>Apart from that, Fire Prevention and Control Measures by GSQM was also established to provide guidance.</p>	<p>Complied</p>
<p>7.11.3</p>	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The above-mentioned fire prevention and control measures were communicated to the stakeholders through:</p> <p><u>Elphil Estate</u></p> <p>A letter dated 19/01/2021 from Estate Manager requesting feedbacks from the stakeholders. Among the adjacent stakeholders engaged are SJK(T) Ladang Elphil, Ng Keang Huat, Raman Maree (coffee shop), Pejabat Renjer Hutan Sg Siput, SK Kg Muhibbah Sg Siput, to name a few.</p> <p><u>Kamuning Estate</u></p> <p>A letter dated 04/03/2021 from Estate Manager requesting feedbacks from the stakeholders. Among the adjacent stakeholders engaged are Kg Suak Ponggor, Kg Temin, Kg Suak Plang, SJK(T) Ladang Changkat Salak, SJK(C) Shing Chung, Wildlife Dept. office, Sg Siput Hospital, to name a few.</p> <p><u>Kinta Kellas Estate</u></p>	<p>Complied</p>

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		A letter dated 25/02/2021 from Estate Manager requesting feedbacks from the stakeholders. Among the adjacent stakeholders engaged are Kellie’s Castle, Kg Seri Jaya, some local communities e.g. cattle farms, to name a few.	
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	<p>(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.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no new development by the certification unit.	Not Applicable
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>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.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <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).</p> <p>- Critical (Major) compliance -</p>	<p>HCV Re-Assessment for Strategic Operating Unit (SOU) 3 Elphil has been conducted on 04-06/05/2017 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final Report (Version 2.0) dated February 2017 was sighted. Summary of HCV area within Elphil POM certification unit as follows:</p> <p>i) Water Catchment area – category HCV 4 (Kamuning Estate, Elphil Estate and Kinta Kellas Estate)</p> <p>ii) River Reserve – category HCV 4 (Kamuning Estate, Elphil Estate and Kinta Kellas Estate)</p> <p>iii) Slope/ Rocky area – category HCV 4 (Kamuning Estate)</p> <p>iv) Isolated remnant forest – category HCV 4 (Kamuning Estate)</p> <p>v) Limestone hill and cave – category HCV 3 (Elphil Estate)</p> <p>Total HCV area identified: 120.64 ha. There has been an increment of 5.83 ha at Kamuning Estate compared to previous year due to an area is now categorised as steep slope (>25°) area.</p>	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable

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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).</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable as no new planting after 15 November 2018 within Elphil POM certification unit.</p>	<p>Not Applicable</p>									
7.12.5	<p>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.</p> <p>- Minor compliance -</p>	<p>Not applicable as no rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018 within Elphil POM certification unit.</p>	<p>Not Applicable</p>									
7.12.6	<p>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.</p> <p>- Minor compliance -</p>	<p>A programme to regularly educate the workforce about the status of RTE species is in place. Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented.</p> <p>Signage was utilised as part of creating awareness among employees on the restriction of poaching/capturing/harming/collecting/killing the RTE species. Conducted training related to RTE status:</p> <table border="1" data-bbox="1137 1257 1921 1347"> <thead> <tr> <th>Estates</th> <th>Title</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Elphil</td> <td>HCV training</td> <td>26/02/2021</td> </tr> <tr> <td>Kamuning</td> <td>HCV training</td> <td>17/02/2020</td> </tr> </tbody> </table>	Estates	Title	Date	Elphil	HCV training	26/02/2021	Kamuning	HCV training	17/02/2020	<p>Complied</p>
Estates	Title	Date										
Elphil	HCV training	26/02/2021										
Kamuning	HCV training	17/02/2020										

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		Kinta Kellas	SDPB Policies/Buffer zone/HCV/Whistleblowing	20/01/2021	
7.12.7	<p>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.</p> <p>- Minor compliance -</p>				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>				Not Applicable

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Appendix B: Approved Time Bound Plan

SDP- RSPO Certification Status for Malaysia Operations

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11-Aug-25	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	Mill was closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-25	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-25	RSPO 543594	N.A
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Mill was closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020, MUTU – RSPO/091	N.A
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019, MUTU-RSPO/094	N.A
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049, MUTU-RSPO/092	N.A
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-855480	N.A

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-21	CU-RSPO-855720	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-24	CU-RSPO-855718	N.A
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051, MUTU-RSPO/093	N.A
17	Kempas	Jasin, Melaka	19 May '10	18-May-25	RSPO-PC-00101	N.A
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	N.A
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-24	RSPO 600305	N.A
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	Mill was closed down.
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-25	RSPO 548299	N.A
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-25	CU-RSPO-863078	N.A
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	N.A
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042, BV-RSPO-20170705-01	N.A
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	RSPO 739013	Re-certification conducted on 11/12/2020.
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	RSPO 547123	Mill was closed down.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-23	RSPO 537872	N.A
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	N.A
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-25	RSPO-PC-00116	N.A
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-25	RSPO-PC-00115	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-25	RSPO-PC-00117	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Mill was closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Mill was closed down.

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	N.A
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	N.A
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	N.A
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	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	Johor	N/A	N/A	N/A	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 Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.

Legends

Certification Withdrawal

NA - NOT APPLICABLE

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

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	SGS-RSPO/PC17-00005	N.A
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	2-Jul-23	MUTU-RSPO/027	N.A
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	N.A
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	N.A

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NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	N.A
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	N.A
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	RSPO 744708	Re-certification remote audit conducted on 22/02/2021. License end date 24-May-2021.
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	N.A
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	N.A
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	N.A
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	29-Dec-21	MUTU-RSPO/009	N.A
13		BETUNG		1-April-14	31-Mar-24	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	RSPO 744702	Re-certification remote audit conducted on 20/02/2021. License end date 22-May-2021.
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	15-Mar-17	MUTU-RSPO/015	Cert. discontinued – supply bases extended to Rantau POM
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU-RSPO/020	N.A
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	N.A
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16	30-Nov-21	MUTU-RSPO/008	N.A
19		MANDAH		1 April 2014	31/03/24	MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	N.A
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	N.A

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NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	N.A
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	2-May-23	MUTU-RSPO/026	N.A
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-24	MUTU-RSPO/044	N.A
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	The property was disposed on 25 June 2019 and a official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019.Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019.Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.

Legends

Pending Certification by RSPO EB	Mill down	closed
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NA - NOT APPLICABLE

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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
	SOU Name					
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	NA	Guadalcanal Province, Solomon Islands	Certified	18-Mar-11
		Tetere Estate				
		Ngalimbiu Estate				
		Mbalisuna Estate				
		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-Feb-18
		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		New Ireland Province, Papua New Guinea	Certified	19-Mar-12
		Kara Estate				
		Nalik Estate				
		West Coast Estate				
		Noatsi Estate				
		Madak Estate				
		Smallholders -North Division (615)				
		Smallholders- South Division (868)				
Smallholders -West Division (309)						
4	Ramu Agricultural Industries Ltd (RAIL)	Gusap Mill	NA	Morobe Province, Papua New Guinea	Certified	5-Aug-10
		Gusap East (Gusap) Estate				
		Gusap West (Paddock) Estate				
		Surinam Estate				
		Dumpu Estate				
		Ngaru Estate				
		J Estate (Jephcott) Estate				
Smallholders - Madang VOPs (71)						

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5	Higaturu Oil Palm (HOP)	Smallholders - Morobe VOPs (253)	NA	Oro Bay Province, Papua New Guinea	Certified	1-Feb-13
		Sangara Oil Mill				
		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	NA	Kimbe, West New Britain, Papua New Guinea	Certified	10-Sep-08
		Kumbango Oil Mill				
		Kapiura Mill				
		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				
		Dami Estate				
		Waisisi Estate				
		Kautu Estate				
		Karaus 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						

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7		Tamare Estate				
		Smallholders LSS Mosa (1822)				
		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)				
	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Erap Mill	Sep-20	Markham Farms	Certified	Certified on 27 March 2020. There is total area for NPP: 710.30 ha which is currently excluded from the certification scope until the NPP is approved.
	Munum Estate	Sep-20		Certified		
	Maralumi Estate	Sep-20		Certified		
Erap Estate	Sep-20		Certified			

Legends

Pending Certification

NA - NOT APPLICABLE

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2020 for SOU 3 Elphil Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2020 for SOU 3 Elphil Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.16
PKO	1.16

Extraction	%
OER	20.69
KER	5.34

Production	t/yr
FFB Process	191,644.76
CPO Produced	39,646.97
PKO Produced	10,235.70

Land Use	Ha
OP Planted Area	9,360.39
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	9,360.39

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	51,727.95	0.61	265.61	0.51	0	0	51,993.57	
CO ₂ Emission from fertilizer	4,022.26	0.05	19.45	0.04	0	0	4,041.71	
NO ₂ Emission	0	0	0	0	0	0	0	
Fuel Consumption	2,117.06	0.02	10.36	0.02	0	0	2,127.42	
Peat Oxidation	514.73	0.01	2.31	0	0	0	517.04	
Sink								
Crop Sequestration	-49,031.22	-0.58	-251.77	-0.48	0	0	-49,282.99	
Conservation Sequestration	0	0	0	0	0	0	0	
Total	9,350.79	0.11	45.96	0.09	10,421.21	0	19,817.96	

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	37,565.62	0.20
Fuel Consumption	60.16	0
Grid Electricity Utilization	655.94	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	38,281.72	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

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	Mar 2020	7,744.33	10,364.19	18,108.52
2	Apr 2020	7,632.57	8,956.25	16,588.82
3	May 2020	7,333.94	7,177.82	14,511.76
4	Jun 2020	8,958.68	8,948.94	17,907.62
5	Jul 2020	7,969.17	9,791.46	17,760.63
6	Aug 2020	7,978.45	10,221.44	18,199.89
7	Sep 2020	7,674.43	10,241.92	17,916.35
8	Oct 2020	6,376.11	7,918.80	14,294.91
9	Nov 2020	5,303.51	6,876.72	12,180.23
10	Dis 2020	5,237.85	6,951.85	12,189.70
11	Jan 2021	5,797.19	9,295.18	15,092.37
12	Feb 2021	7,065.73	10,531.32	17,597.05
Total		85,071.96	107,275.89	192,347.85

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Mar 2020	1,549.63	416.64
2	Apr 2020	1,501.33	386.97
3	May 2020	1,490.26	372.56
4	Jun 2020	1,891.18	475.71
5	Jul 2020	1,702.21	461.41
6	Aug 2020	1,698.61	442.00
7	Sep 2020	1,626.98	416.48
8	Oct 2020	1,698.58	399.11
9	Nov 2020	1,104.72	272.60
10	Dis 2020	1,074.81	255.61
11	Jan 2021	1,159.44	282.32
12	Feb 2021	1,466.85	382.26
Total		17,964.60	4,563.67

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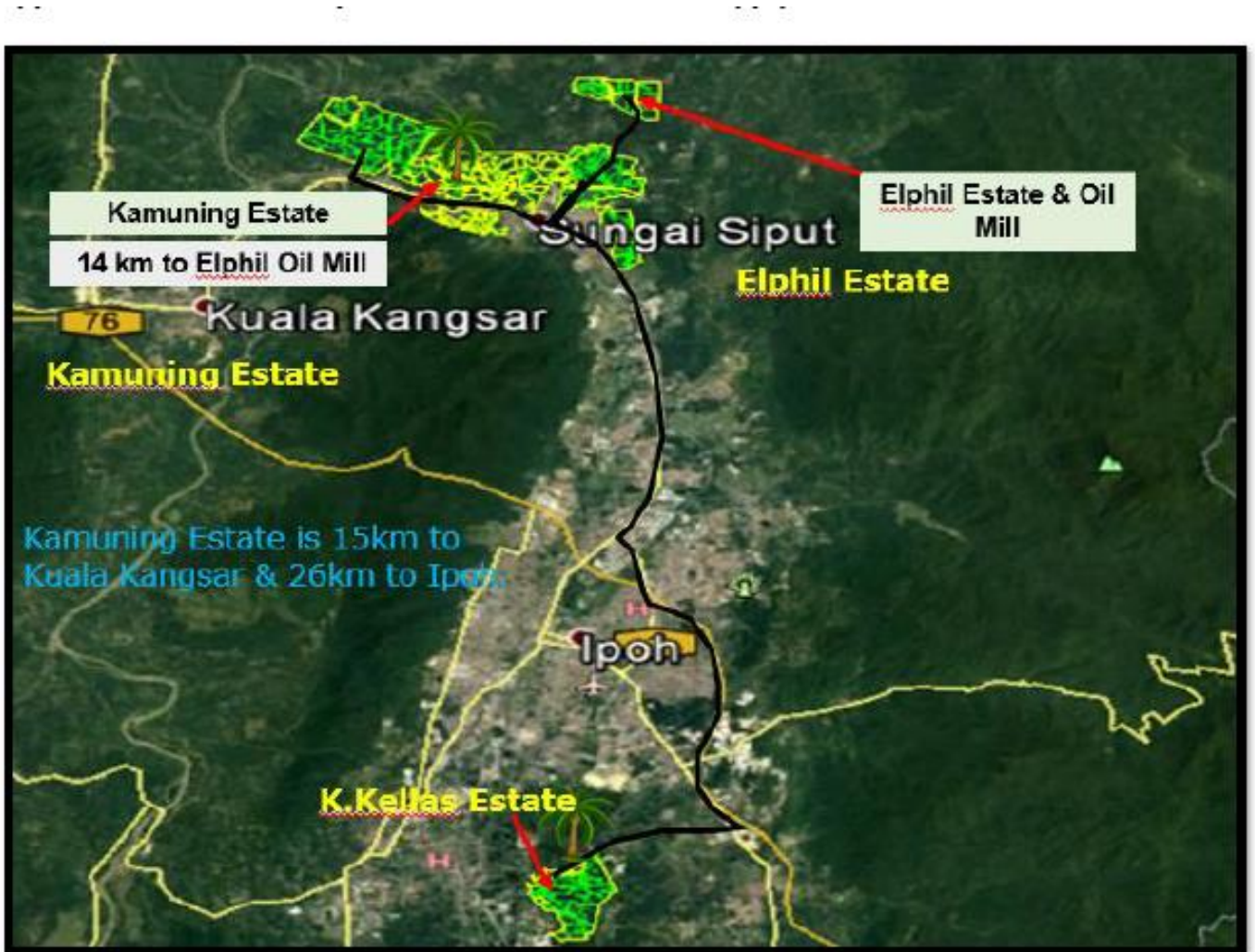
C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	SDO Port Klang	P010000000309	99.71	-
2	SDP Carey KCP	P010000000310	-	400.00
3	SDO Port Klang	P010000000309	77.27	-
4	SDP Carey KCP	P010000000310	-	567.10
Total			176.98	967.10

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				

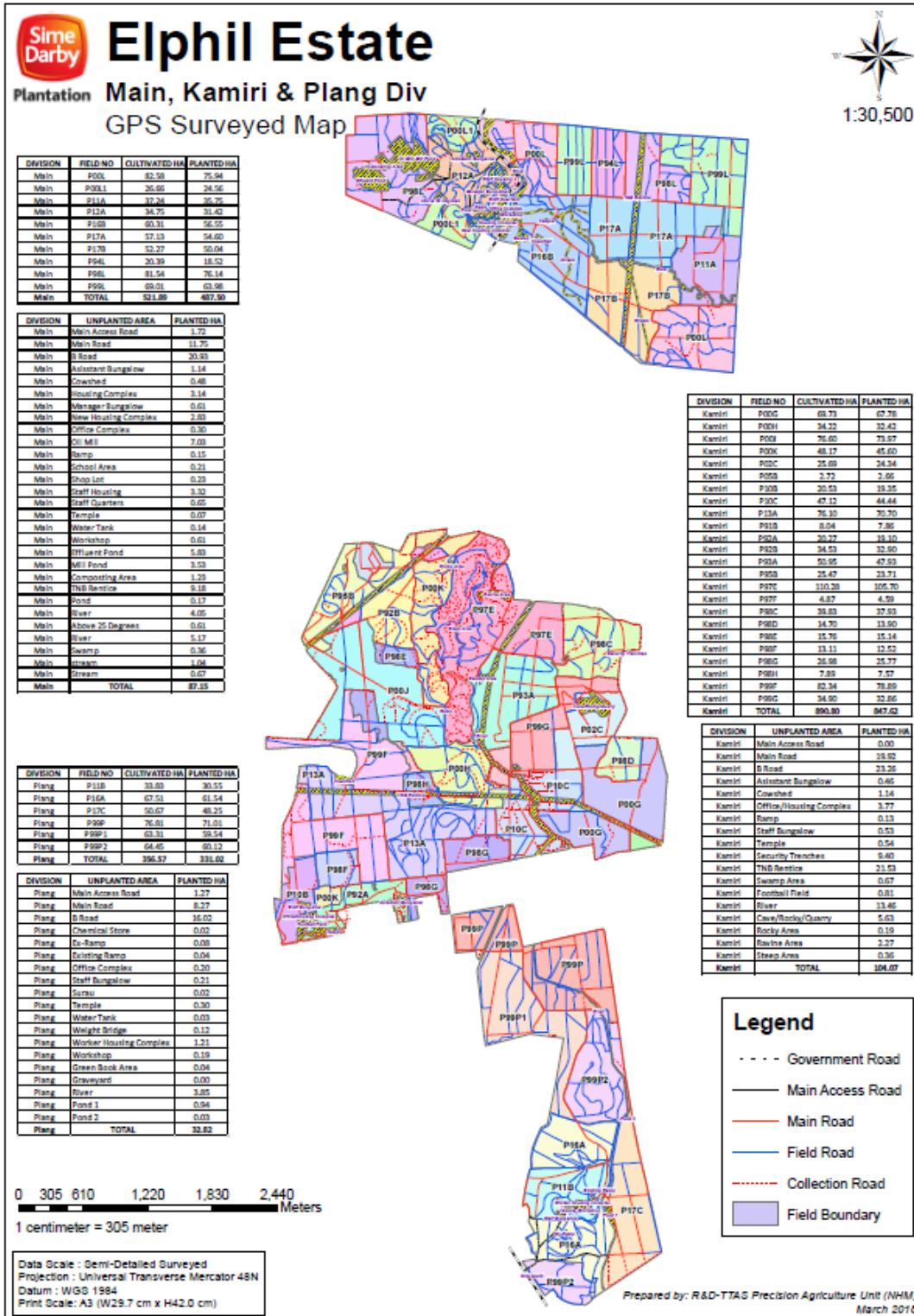
E. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	BMD	7,539.08	-	
2	SDOPKR	8,985.41	-	
3	PGEO	-	896.69	
4	KCP Carey	-	2,097.90	
5	Pangkor	-	593.96	
6	SDO Trading	1,199.24	-	
Total		17,723.73	3,588.55	

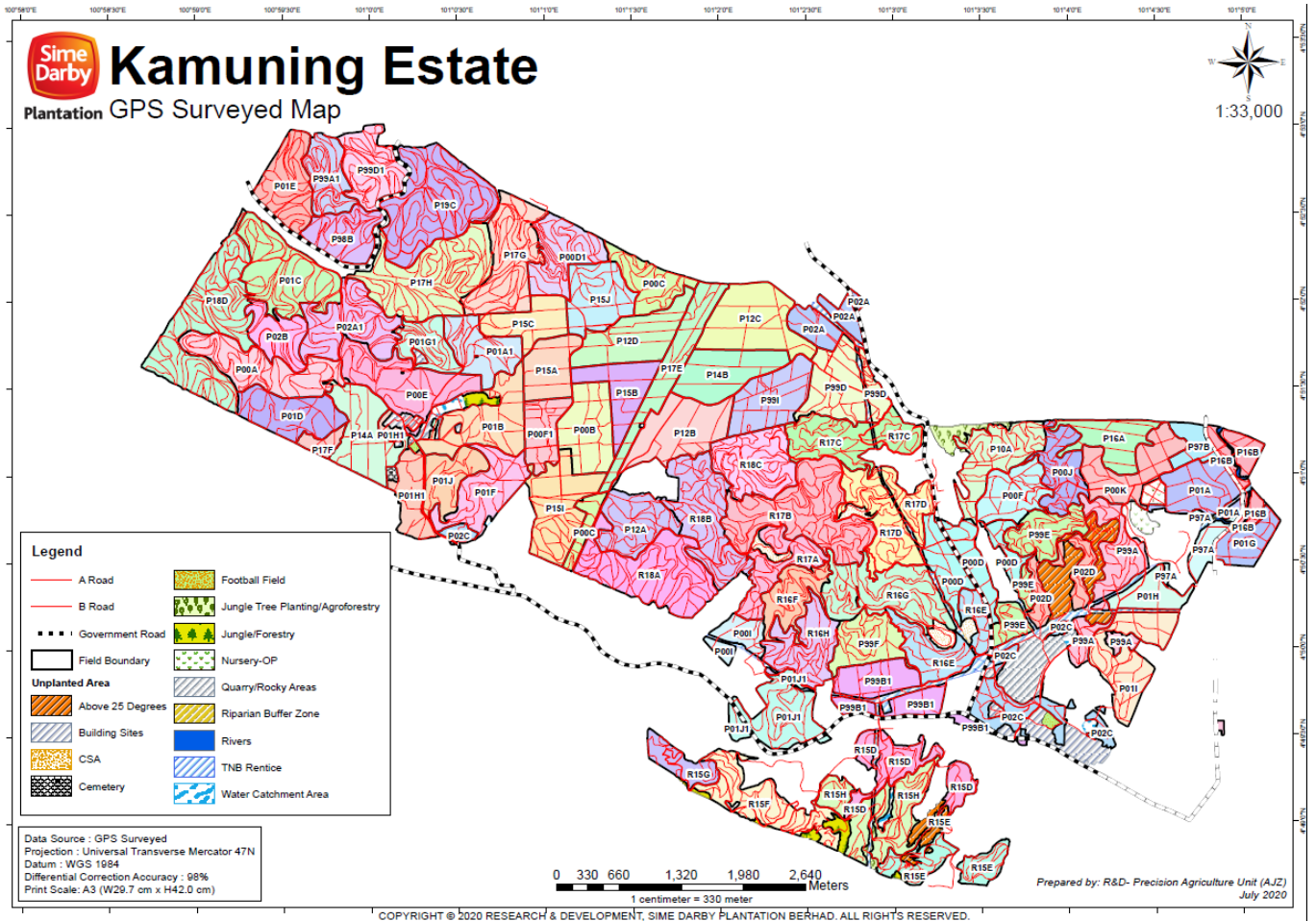
F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
N/A			

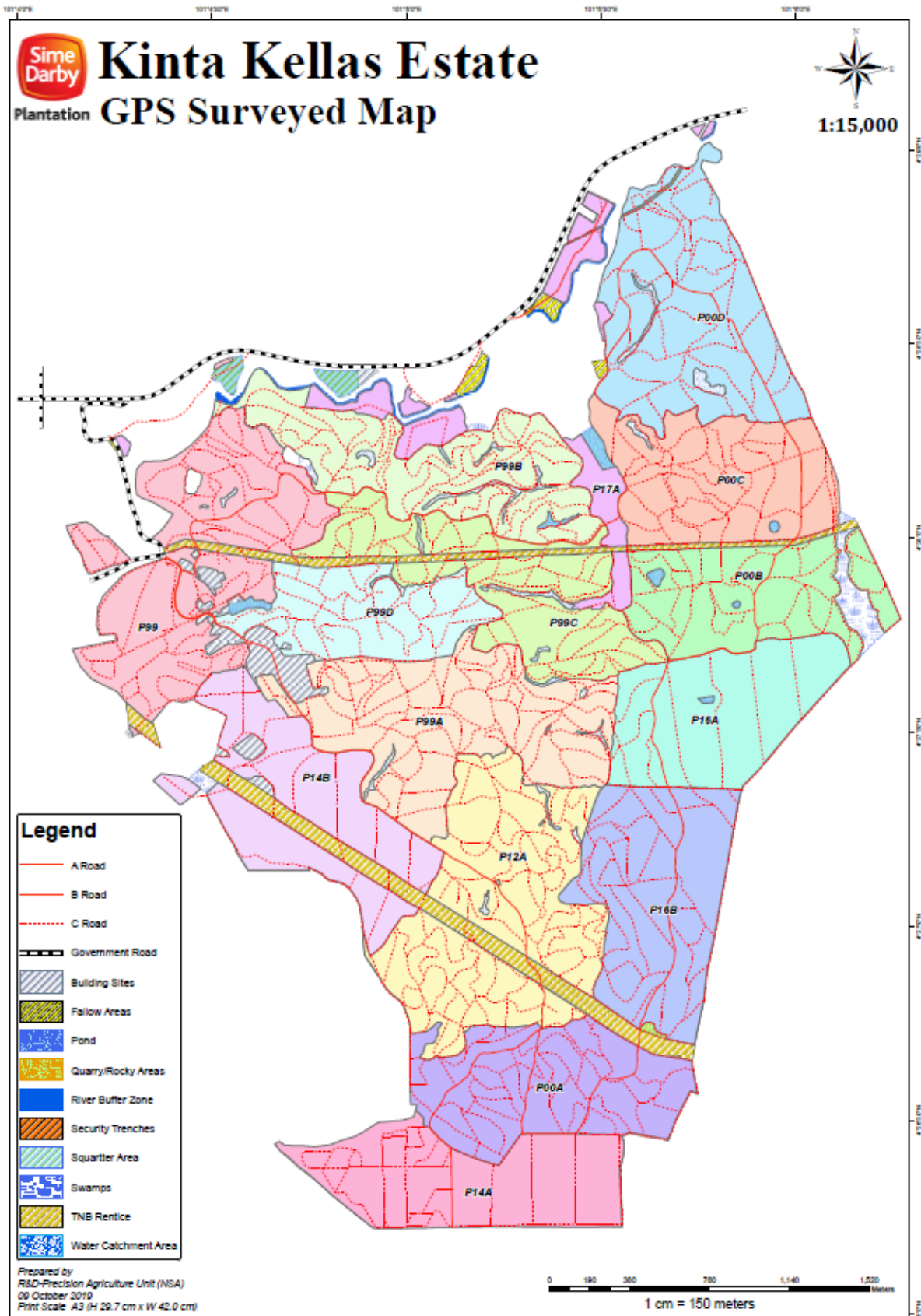
Appendix E: Location Map of Certification Unit and Supply bases



Appendix F: Estate Field Map







Appendix G: List of Smallholder Sampled

Not applicable.

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