

**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 47301 Petaling Jaya, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 7) Bukit Kerayong Palm Oil Mill and Supply Base
Location of Certification Unit: Bukit Kerayong Road 42200 Kapar Klang, Selangor, Malaysia
Date of Final Report: 06/07/2021

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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, 47301 Petaling Jaya, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 7) – Bukit Kerayong Palm Oil Mill		
Location / Address	Bukit Kerayong Road 42200 Kapar, Klang, Selangor, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, Group Sustainability Department) Mr. Senthilkumaran Gopal (Mill Manager)	E-mail	shylaja.vasudevan@simedarbyplantation.com kks.bk.kerayong@simedarbyplantation.com
Telephone	+603-78484379 (Head Office) +607-787 5100 (Mill)	Facsimile	+603 78484363 (Head Office)

2. Certification Information			
Certificate Number	RSPO 550181	Date of First Certification	15/04/2011
		Certificate Start Date	15/04/2021
		Certificate Expiry Date	14/04/2026
Scope of Certification	Palm oil and Palm Kernel Production		
Visit Objectives	To conduct a recertification assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for 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 2) <input type="checkbox"/> Scope Extension		

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Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> <i>Malaysia</i> 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 690368	MS 2530-3:2013 (MSPO Part 3) – General principles for oil palm plantations and organised smallholders	BSI Services Malaysia Sdn Bhd	13/03/2023
MSPO 682049	MS 2530-4:2013 (MSPO Part 4) – General principles for palm oil mills		13/03/2023
MSPO 714128	MSPO Supply Chain Certification Standard		31/07/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Kerayong POM	Bukit Kerayong Road, 42200 Kapar, Klang, Selangor, Malaysia	3° 11' 12.7" N	101° 22' 29.6" E
Bukit Kerayong Estate	Jalan Bukit Kerayong, 42200 Kapar, Klang, Selangor, Malaysia	3° 10' 31.3" N	101° 21' 00.5" E
Bukit Cheraka Estate	Jalan Jeram, 45809 Jeram, Selangor, Malaysia	3° 13' 38.6" N	101° 22' 01.7" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Cheraka Estate	3,388.70	55.52	203.40	3,647.62	92.90
Bukit Kerayong Estate	2,484.98	3.00	211.30	2,699.28	92.60
Total	5,873.68	58.52	414.7	6,346.9	89.41

**Bukit Kerayong Estate: Change of title and planted area due to resurvey. Some of area have been excluded for West Cost Expressway project*

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6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Cheraka Estate	413.97	865.13	1,224.30	885.30	0	2,974.73	413.97
Bukit Kerayong Estate	223.66	1174.34	1,086.98	0	0	2,261.32	223.66
Total (ha)	637.63	2039.47	2,311.28	885.3	0	5,236.05	637.63
Note:							

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			Forecast (May 21 – April 2022)
	Estimated (May 2020 – April 2021)	Actual (Jan - Dec 2020)		
		Previous license period (N/A)	Current license period (Jan – Dec 2020)	
Bukit Cheraka Estate	64,735.17	0	59,702.60	72,609.20
Bukit Kerayong Estate	67,600.00	0	52,040.35	62,176.10
Total	132,335.17	111,742.95		134,785.3
Note:				

8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			Forecast (May 21 – April 2022)
	Estimated (May 2020 – April 2021)	Actual (Jan - Dec 2020)		
	N/A	Previous license period (N/A)	Current license period (Jan – Dec 2020)	N/A
Sepang Estate			20.81	
Total		20.81		
Note:				

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)	
	Tonnage / year

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Independent FFB Supplier	Estimated (May 2020 – April 2021)	Actual (Jan - Dec 2020)		Forecast (May 21 – April 2022)
Nil		Previous license period (N/A)	Current license period (Jan – Dec 20)	
3 rd party FFB supplier	N/A		13,447.98	N/A
Total	N/A	13,447.98		N/A
Note:				

10. Certified Tonnage				
	Estimated (May 2020 – April 2021)	Actual (Jan - Dec 2020)		Forecast (May 21 – April 2022)
	FFB	FFB		FFB
Mill Capacity: 30 MT/hr	132,335.17	Previous license period (N/A)	Current license period (Jan - Dec 20)	134,785.30
		0	111,763.76	
SCC Model: MB	CPO(OER:20.00%)	CPO (OER: 20.46%)		CPO(OER: 20.35%)
	26,467.03	0	22,864.22	27,428.81
	PK (KER:4.89%)	PK (KER:5.30%)		PK (KER:5.00%)
	6,471.19	0	5,924.97	6,739.27
TOTAL	N/A	N/A		N/A
Note:				

11. Actual Sold Volume (CPO)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	4,689.32	0	0	17,926.76	22,616.08
Previous License period					
CPO (MT)	0	0	0	0	0

12. Actual Sold Volume (PK)					
Current License period					

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	3,433.26	0	0	1,861.81	5,295.07
Previous License period					
PK (MT)	0	0	0	0	0

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 **4-7/1/2021**. The audit programme is included as Section 2.3. Public Notification was posted 30 days prior to the on-site assessment via BSI's global stakeholder notification invitation link as following: https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2020/12-01rspo-public-notification_recertification_sou-7-sime-darby_bukit-kerayong-pom_english.pdf

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.

Due to the COVID-19 pandemic, the Critical NC close out off-site assessment was conducted on **26/03/2021**. The audit programs are included in Section 2.3.

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

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

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

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

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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 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 (Recertification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Bukit Kerayong POM	√	√	√	√	√
Bukit Kerayong Estate	√	√	√	√	√
Bukit Cheraka Estate	√	√	√	√	√

Tentative Date of Next Visit: January 3, 2022 - January 6, 2022

Total No. of Mandays: 9.5 man days

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>
Mohamed Hidir Zainal Abidin	Team Leader	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best

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		practices, safety and health, environmental and workers and stakeholders consultation.
Nicholas Cheong	Team Member	Holds a Master of Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia. He has more than 7 years of working experience in sustainability auditing for palm oil industry and hydropower plant. He is also an expert in Greenhouse Gas emissions accounting. He has also 2 years of working experience in wastewater treatment and operations. He has completed the ISO9001, ISO14001, RSPO P&C Lead Auditor course, RSPO Supply Chain Lead Auditor Course, RBA Labor & Ethic Lead Auditor Course and MSPO Awareness Training. In his previous certification body, he was a Lead Assessor for Clean Development Mechanism, World Commission of Dam and ISCC. He had been involved in Sustainable Palm Oil auditing for more than 5 years. In this assessment, the focus element includes legal requirements, social and workers welfare, workers health and safety and supply chain. He is fluent in both verbal/written in English.
Yusoff Nizar Khairan	Team Member	Has educational background: Certificate of Safety and Health Officer-Malaysian Insurance Institute (2003). Bachelor of Corporate Administration (Hons)-MARA University of Technology, Malaysia (2003), Master of Science in Occupational Safety and Health Management-Northern University of Malaysia (2011). Successfully attended course ISO 9001:2000 IRCA/IATC A Lead Auditor Training-International Management & Technology Limited (Kuala Lumpur), ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Training Course-Aspects Moody Certification Ltd (UK). OH&SMS IRCA Certified Lead Auditor Training Course-Moody International (KL). MS 1722 Lead Auditor Training NIOSH Certification (KL) and RSPO – TUV Rheinland (Indonesia). MSPO Auditing – SGS (Malaysia). RSPO P&C 2018 Lead Auditor Course – Checkmark Training. Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC). Experience in managing, consulting, training and auditing Quality, Environmental, Occupational Safety and Health Management Systems such as ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011 since 1996. Contract Trainer of OSH & Environmental Legal & Other Requirements Lead Auditors course for SIRIM Training Services Sdn Bhd & NIOSH Certification Sdn Bhd. Contract Auditor for Quality, Environmental, Occupational Safety and Health Management System and Malaysia Sustainable Palm Oil (MSPO). OSH, Legal and Environmental Auditor for TUV Rheinland Malaysia RSPO Principles & Criteria. Contract SIRIM QAS International Auditor (2006). Department of Occupational Safety and Health Malaysia (DOSH) Registered Safety and Health Officer (2003-2006). Approved Human Resources Development Fund (HRDF) Trainer (since 2011). Also appointed as Assessor for Prime Minister’s Hibiscus Award involving assessment for oil and gas companies, plantations industries, manufacturing, utilities, cleaning and transportations services (since 2003). MPOCC Registered Peer Reviewer. During the assessment, he covered the legal aspects, best practices, traceability, biodiversity and environment.

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Accompanying Persons: *Not applicable*

Name	Role
Hu Ning Sing	Observer/Qualifying reviewer

2.3 Assessment Plan

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

Date	Time	Subjects	MH	NC	YK	HNS
Monday 3/1/2021	PM	Check in hotel near Setia Alam	√	-	-	-
Monday 4/1/2021 Bkt Kerayong POM	0730	Audit team travel to Bukit Kerayong POM	√	√	√	√
	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 				
	0830 - 1200	Bkt Kerayong POM 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	Bkt Kerayong POM 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	√	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√	√
Tuesday, 5/1/2021 Bukit Kerayong Estate	0730	Audit team travel to Bukit Kerayong Estate	√	√	√	
	0900 - 1200	Bukit Kerayong 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	Bukit Kerayong 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 - 1700	Interim Closing Briefing	√	√	√	
Wednesday 6/1/21	0730	Travel to Bukit Cheraka Estate	√	√	√	
Bukit Cheraka Estate	0900 - 1200	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	Bukit Cheraka 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	√	√	√	
Thursday 7/1/2021	0730	Travel to Bukit Kerayong POM	√	-	-	
Bukit Kerayong POM	0830 – 1230	RSPO Supply chain requirements for mill - Identity Preserved Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims				
	1230	End of audit	√	-	-	

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Major @ Critical NC Close Out

PRELIMINARY AGENDA		
Time	Subjects	Mohd Hidhir
Friday 26/03/2021 09.00 – 09.15	Opening Meeting via MS team <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Briefing on remote verification plan 	√
09.15 – 10.30	Bukit Kerayong POM – Verification on previous Major NC. Site observation, workers interview (individual and group session) if necessary Document review – implemented evidence	√
10.30 – 11.30	Bukit Kerayong Estate – Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	√
11.30 – 12.00	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. Certification plan for the new acquisition shall be available.	No. There is no new acquisitions as at latest TBP 2020.	Yes

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<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. 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 Sekretariat 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>Yes</p>
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	ACOP 2019 has been cross-referenced as below: 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	No lapses. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat	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	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above.	Yes
Un-Certified Units or Holdings <i>(any non-compliance against the below shall be raised as Major Non-compliance)</i>		
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. This is further check in the website: https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . Management units with potential liability is 17 and a total of 15 management units has submitted the LUCA to RSPO.	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	There is no legal non-compliance reported for the other uncertified management units.	Yes

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<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>Yes. The sustainability unit has conducted the internal audit for 9 units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. Other than that, land conflicts and land disputes also being audited and approved by Head of Sustainability-Indonesia (Alagendran Maniam) on 22/05/2019.</p> <p>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.</p>	<p>Yes</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Yes</p>

3.3 Progress of scheme smallholders and/or outgrowers (Not applicable)

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>Not applicable</p>	

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 **4** Critical; **3** Minor nonconformities and **1** Opportunity For Improvement raised. The **Bukit Kerayong Palm Oil Mill and supply base** Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
<p>NCR Ref #</p>	<p>2007911-202101-M1</p>	<p>Clause & Category (Critical / Minor)</p>	<p>2.2.2 (Critical)</p>

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Date Issued	7/1/2021	Due Date	6/4/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	6/4/2021
Statement of Nonconformity:	Evidence of legal due diligence of contracted third parties was not effectively demonstrated.		
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>i) Reviewed the pay slips and Daily Oil Mill Declared Weight – By Delivery Note for September 2020 found that 4 of the contractor’s workers (FFB transporter) in Bukit Kerayong Estate have worked on rest day for 3 days without paying according to Employment Act 1955. The sampled workers as below: I/C No. :730622-10-55XX, 890911-10-51XX, 711125-10-64XX and 650128-10-68XX Date of Work on Rest Day – 06/09/2020, 13/09/2020 and 27/09/2020</p> <p>ii) Contract between KSG enterprise and workers have not detailed out the terms and conditions and compliance toward Employment Act 1955 requirements.</p> <p>Previous minor was not effectively closed and upgraded to major NC.</p>		
Corrections:	<p>i. Estate to investigate the cause and issue letter to FFB transporter for them to ensure the workers they employ comply with the legal requirements (wages, rest day (double pay), work on rest day etc) and reimburse workers with the payments due within the timeline stipulated also to make clear of our expectations.</p> <p>ii. To issue warning letter to KSG enterprise for them to issue revised employment contract with the compliance toward Employment Act 1955 requirement detailing on annual leave, rest day, termination clause, sick leave etc</p>		
Root Cause Analysis:	Ineffective monitoring system on contractor’s compliance to legal labour requirement and employment act 1955		
Corrective Actions:	<p>i) To emphasize checks on suppliers during internal audits/or planned inspection on contractor by RSQM/Estate/Mill management</p> <p>ii) Estate management will ensure all contractor’s document comply with Employment Act 1955 and will be monitor continuously.</p>		
Assessment Conclusion:	<p>Remote Major NC close out verification:</p> <p>i) Warning letter to KSG Enterprise dated 22nd January 2021 was verified. Briefing and meeting with the contractor (KSG Enterprise) was carried out on 10/3/21 as to emphasis on the legal compliance and due diligence process for contractors. Minute of meeting dated 10/3/21 was made available for verification.</p> <p>ii) Investigation was done by the estate showed that the workers has not worked on rest day. Duty roaster for all drivers for September 2020 was verified. Other related employment documentations pay slip, employment contract were kept for reference and evidence of verification.</p> <p>ii) Supplier audit/verification was made to ensure compliance with the legal requirements and conformance with RSPO P&C MYNI 2019 requirements. Latest</p>		

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	supplier verification was carried out on 6/4/21 by RSQM - CER person in charge. Based on the report, no non-compliance recorded for the verification. Implemented evidence was found to be sufficient to close the NC on 6/4/21. Continuous implementation will be further verified in the next assessment.
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Non-conformity			
NCR Ref #	2007911-202101-M2	Clause & Category (Critical / Minor)	6.7.2 (Critical)
Date Issued	7/1/2021	Due Date	6/4/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	6/4/2021
Statement of Nonconformity:	First Aid Kits does not fully contain required items and contain items that has expired		
Requirement Reference:	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.		
Objective Evidence:	Found in first aid box 6 at Mill's workshop includes items that are expired. Dettol Antiseptic cream expired on 01/01/2021, Alcohol Swab expired in May 2018. Also items are not available i.e. Eye drop and latex glove. Previous minor was not effectively closed and upgraded to major NC.		
Corrections:	To check and replace/top-up all the first aid box in the mill		
Root Cause Analysis:	Inadequate tools to monitor first aid system and the expiration of contents/medication		
Corrective Actions:	Monitoring on ERP procedure including first aid kit box including using a masterlist provided by MA or Assistant In-charge with all expiry dates of medication and the masterlist are accessible to all first aid box holder and reviewed during quarterly safety meeting. To appoint a dedicated person to monitor first aid kit and provide training to the PIC by Estate MA		
Assessment Conclusion:	Remote Major NC close out verification: i) ERP checklist was verified for March 2021 checked by MA and verified by mill engineer. Details related to expiry date and number of items updated in the list. ii) Process supervisor is the person in charge appointed for first aid kit monitoring. Implemented evidence was found to be sufficient to close the NC on 6/4/21. Continuous implementation will be further verified in the next assessment.		

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Non-conformity			
NCR Ref #	2007911-202101-M3	Clause & Category (Critical / Minor)	3.3.2 (Critical)
Date Issued	7/1/2021	Due Date	6/4/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	6/4/2021
Statement of Nonconformity:	Procedures were not fully implemented according to the respective SOP.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	1. The disposal of filters, contaminated rags and gloves at mill is not according to the MQMS – Handling of Environmental Aspects. The filters, contaminated rags and gloves shall be disposed as scheduled waste. However it was found that it was disposed in a mixed bin located at the sterilization station next to the scheduled waste store.		
Corrections:	i) Filter, contaminated rags and gloves have been transferred to schedule waste store for disposal immediately. ii) To re-evaluate and review Environment Impact/Aspect Evaluation for Bukit Kerayong Estate and develop action plan in Environment Management Plan should the new revised EIE has a high compliance potential of non-compliance to environmental regulation		
Root Cause Analysis:	Training not carried out on handling of chemical, scheduled wastes and on the EAI/EIE procedure		
Corrective Actions:	RSQM to plan a scheduled waste training to person handling schedule waste in the mill and to include monitoring of schedules waste in workplace inspection checklist to ensure all scheduled waste are dispose according to Environment Quality (Scheduled Waste) Reg. 2005. RSQM will plan a training/coaching session with person-charge on the Environmental Impact Evaluation/Assessment by in Feb/Mar 2021 to ensure it comply with related act and requirement		
Assessment Conclusion:	Remote Major NC close out verification: i) Related training for scheduled waste and eswiss training was carried out on 11/2/21 by RSQM-OSH officer. Training was given to the estate assistant, store keeper and MA as to update on the requirement related to eswiss and scheduled waste. For Bkt Kerayong POM, the training was done on 15/1/21. ii) Evaluation and identification of environment aspect (EIA and EIE) was revised on 8/2/21. Related significant aspects contributes to the establishment of environmental management plan for FY2021. Refresher training on environmental aspects and impacts was carried out on 10/2/21. iii) Related inventory has been updated and included the latest waste generation for April 2021. 5th schedule dated 6/4/21 was verified. Implemented evidence was found to be sufficient to close the NC on 6/4/21. Continuous implementation will be further verified in the next assessment.		

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Non-conformity			
NCR Ref #	2007911-202101-M4	Clause & Category (Critical / Minor)	6.7.3 (Critical)
Date Issued	7/1/2021	Due Date	6/4/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	6/4/2021
Statement of Nonconformity:	Sighted workers exposed to potential hearing loss, legs and eyes injury not wearing required PPEs as required.		
Requirement Reference:	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		
Objective Evidence:	<ul style="list-style-type: none"> • More than 5 workers sighted at various high noise areas in Bukit Kerayong Oil Mill. • Substitute worker at loading bay and lorry driver not wearing safety boots. • 7 Sampled sprayers at Bukit Kerayong Estate not wearing safety glass/goggles provided to them. 		
Corrections:	i)To issue warning letter to mandore and spraying gang for not wearing a proper PPE ii)To supply and replace the new earplug to all workers.		
Root Cause Analysis:	Lack of effective monitoring system for PPE usage by workers, contractor and lorry driver		
Corrective Actions:	i)Supervisor to check and ensure workers have full PPE before start working via PPE monitoring book. ii)To enforce AP checks on OCP lorry drivers at the entrance point and to keep a substitute PPE should the driver found not wearing a proper PPE Remote Major NC close out verification: PPE monitoring and compliance was done by supervisor prior to start work and AP for OCP driver. Related record monitoring dated 6/4/21 was verified. Warning and reminder was given to the relevant workers to ensure that no repeated issue of PPE compliance in future. Training on PPE was done 10/2/21 for all workers.		
Assessment Conclusion:	Implemented evidence was found to be sufficient to close the NC on 6/4/21. Continuous implementation will be further verified in the next assessment.		

Non-conformity			
NCR Ref #	2007911-202101-N1	Clause & Category (Critical / Minor)	3.4.2 (Minor)
Date Issued	7/1/2021	Due Date	To be verified in the surveillance assessment

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Closed (Yes / No)	No	Date of nonconformity Closure	To be verified in the surveillance assessment
Statement of Nonconformity:	Social management and monitoring plan was not comprehensively developed with participation of affected stakeholders		
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:	Inputs from stakeholders (internal and external) from OCP meeting 18/11/20, union meeting 29/12/20 were not included in the development of management and monitoring plan. Based on the SIA plan for FY2021, non of the above issues included in the management plan		
Corrections:	Ineffective mechanism to update the action plan to include issues raised in meeting organized.		
Root Cause Analysis:	Mill Management will update new Social Management Plan base on the Gender Meeting, Stakeholder Meeting and Union Meeting and will take necessary action base on the issue raised by stakeholder. All action plan will be cross check during internal audit.		
Corrective Actions:	<p>To establish a comprehensive list of inputs to be systematically reviewed for Social Management Plan. (including other concerns from other channels such as Gender Meeting, Stakeholder, Union Meeting, Complaint Books, other grievance mechanism, IOM by Management/HR etc).</p> <p>Social Management Plan to be reviewed by management every quarterly followed by internal audit checks.</p>		
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

Non-conformity			
NCR Ref #	2007911-202101-N2	Clause & Category (Critical / Minor)	3.5.2 (Minor)
Date Issued	7/1/2021	Due Date	To be verified in the surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	To be verified in the surveillance assessment
Statement of Nonconformity:	Employment procedures were not effectively implemented		
Requirement Reference:	Employment procedures are implemented, and records are maintained.		
Objective Evidence:	Referring to the latest inter-office mail dated 3/12/19 by Head of HR Upstream, newly revised contract for new local recruits and existing local workers issued under enclosure 1 – new recruitment – Peninsular Malaysia and enclosure 4 –		

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	existing employee – Peninsular. Enclosure 4 was not available for existing local workers at Bukit Kerayong POM for; Employee ID: 0000009838 Employee ID: 0000029579
Corrections:	To issue a revised employment contract to all existing employee including the affected workers as per the IOM with immediate effect
Root Cause Analysis:	The reason to re-issue the new employment contract is not properly communicated and lack of enforcement on the ground
Corrective Actions:	Mill Management will have close communication with Regional Human Resource and ensure comply with Employment Act 1955. To monitor the implementation of the communicated procedure during site visit and internal audit process by Regional HR/Careline or RSQM
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2007911-202101-N3	Clause & Category (Critical / Minor)	2.1.2 (Critical)
Date Issued	7/1/2021	Due Date	To be verified in the surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	To be verified in the surveillance assessment
Statement of Nonconformity:	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.		
Requirement Reference:	<p>1. Scheduled Waste Regulation 2005 requires training to be provided 2 years once and Occupational Safety and Health (Noise Exposure) Regulation 2019 requires training to be provided. No training was provided at mill. However, the summary of compliance shows all regulations are 100% compliance.</p> <p>2. As according to the Bukit Cherekah Estate internal audit, an OFI was raised regarding maintaining the e-Swiss was not complying with EQA 1974. However in the Legal Other Requirement Register – Summary of Compliance, it was stated that 100% compliance on EQA 1974 (Scheduled Waste) Regulation 2005.</p>		
Objective Evidence:	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.		
Corrections:	RSQM will conduct a training/coaching session with the respective operating unit representative on monitoring legal compliance tentatively on 10th February 2021		
Root Cause Analysis:	No proper training to person in-charge on monitoring and updating legal compliances in the operating unit		

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Corrective Actions:	To include training on monitoring of legal compliance and SDP procedure in operating unit training plan every year. RSQM will communicate with the respective PIC as and when there is a new update on legislation.
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>7.12.4</p> <p>1. The HCV management plan and monitoring could be further improved to ensure consistent implementation:</p> <p>a) Water catchment area water sampling consistency at Bukit Kerayong Estate.</p> <p>b) The development of Management Plan at Bukit Kerayong Estate can be further improved especially on the proposed completion date. All of the actions are on-going actions but a propose completion date was identified. Monitoring records of erosion and encroachment at Bukit Cheraka Estate.</p> <p>2. The implementation of biodiversity management plan could be improved to demonstrate consistency across the entire SOU 7. At Bukit Cheraka Estate it was demonstrated that management plan of the CSA is available however it was not available in Bukit Kerayong Estate especially at plot P08C and P08A.</p>

Positive Findings	
PF #	Description
PF 1	Good feedbacks from the stakeholders.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1874552-202001-M1	Clause & Category (Critical / Minor)	6.2.3 (Critical)
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/4/2020
Statement of Nonconformity:	The legal labour requirements was not fully demonstrated.		
Requirement Reference:	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:	1. In Bukit Kerayong Estate, sighted on estate daily attendance report and pay slip for Muhammad Shahir Bin Ismail (Employee ID: 0000155534) that he		

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	<p>worked on his rest day on 13 & 20 Oct 2019 but being paid with normal rate. 2. In Bukit Kerayong POM, found that Latchumy (Employee ID: 00006767) and Kavitha (Employee ID: 000006776) has worked at night shift after 10 pm without having the Permit for Female Nightshift by Labour Department as below:</p> <p>Kavitha:</p> <ol style="list-style-type: none"> 1. 2/08/2019: 1526-2301 2. 3/08/2019: 1513-2256 3. 8/08/2019: 1533-2300 4. 13/08/2019: 1502-2306 5. 16/08/2019: 1500-2300 6. 24/08/2019: 0804-2300 7. 30/08/2019: 0756-2306 8. 7/10/2019: 1509-2300 9. 9/10/2019: 1511—2300 10. 10/10/2019: 1510-2258 11. 21/10/2019: 1511-2306 12. 18/12/2019: 1458-2304 <p>Latchumy:</p> <ol style="list-style-type: none"> 1. 6/8/2019: 1453-2303 2. 7/8/2019: 1512-2308 3. 9/8/2019: 1506-2300 4. 17/8/201: 1454-2218 5. 19/8/2019: 1445-2259 6. 20/8/2019: 1450-2231 7. 21/8/2019: 1453-2256 8. 22/8/2019: 1452-2308
Corrective Actions:	<p>Training on payroll system and verification procedure to estate personal and person In-charge to ensure no hiccup in the data entry process.</p> <p>SQM with the assistance of regional HR will organise a training on labour legal compliance for mill and estate personnel tentatively in May/June 2020</p>
Assessment Conclusion:	<p>No recurrence of issue observed during this assessment. Based on the sample check on check roll, no evidence of false data entry sighted. A male weighbridge clerk has been appointed to cover 2nd shift/night shift. Female weighbridge operator will only during first shift. The previous major NC is remain closed.</p>

Non-conformity			
NCR Ref #	1874552-202001-M2	Clause & Category (Critical / Minor)	3.6.1(Critical/Major)
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/4/2020
Statement of Nonconformity:	HIRARC for ramp lever operator was not assessed		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	Sampled the HIRARC at the BKEPOM for the Ramp workstation (SOP No.: BKOM/07/09-16; SOP Title: BKOM-OO-RAMP; Review Date: 3/1/2019), the		

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	HIRARC did not identify the hazards of the lever operator below the ramp. During the site visit at the mill it was sighted the lever operator working on the raised platform while sitting on a high chair. The possible hazards include slip and fall due to slippery surface, falling from height, etc.
Corrective Actions:	SQM will conduct refresher training on HIRARC procedure for operation personal and to ensure the HIRARC assessment covers all operation and its' activities.
Assessment Conclusion:	Continuous refresher training was carried out for operation personnel ensure the HIRARC assessment covers all operation and its' activities. No recurrence of issue observed during this assessment. Thus, the previous major NC is remain closed.

Non-conformity			
NCR Ref #	1874552-202001-N1	Clause & Category (Critical / Minor)	4.2.3 (minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	7/1/2021
Statement of Nonconformity:	No evidence that 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		
Requirement Reference:	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.		
Objective Evidence:	Any repairs required by Internal Stakeholders need to fill-up the House Repair Requisition Form. Sample taken on House No WQ-47; Mr Kumaren dated 25th June 2019 on leaking washing basin, damage of concrete drain and faulty lamp. Faulty lamp being repaired by the Mill Charge-man. However, other repairs which incurred higher cost a quotation is required as the work will be outsourcing. Sample taken on the quotation being obtained from contractor, Biglenz Tech Services on 4th November 2019 and work has been approved on 12th November 2019 through Doc No 4300487407. Seen, the invoice under No 0000030 being submitted on 18th November 2019.		
Corrective Actions:	To have a guideline on the complaint procedure to and communicate to all employees.		
Assessment Conclusion:	The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. Process of capturing and resolving complaint found to be effective. Sample of complaints records reviewed and the issues have been resolved in stipulated timeline. The implemented evidence found to be adequate to close the minor NC. Continuous implementation will be further verified in the next audit.		

Non-conformity			
NCR Ref #	1874552-202001-N2	Clause & Category	2.2.2 (minor)

		(Critical / Minor)	
Closed (Yes / No)	No	Date of nonconformity Closure	Escalated to major NC
Statement of Nonconformity:	The sampled contractor for Bukit Kerayong POM is not fully meet the applicable requirements related to Employment Act 1955		
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>In Bukit Kerayong POM, Lotus Two Enterprise has signed the Vendor Integrity Pledge (as due diligence) on 22/01/2020 and declaration to follow RSPO/ISCC/MSPO on 10/12/2019.</p> <p>However found non-compliance as below:</p> <ol style="list-style-type: none"> 1. There is one worker named Mehdi Hassan with working permit for Toranor Sdn Bhd as Construction Worker temporarily work at Lotus Two Enterprise letter dated 17/07/2019. 2. Pay slips for Romel, Hasan Sheikh and Mehdi Hassan for January 2020, Dec 2019 and Nov 2019 has no SOCSO contribution. LotusTwo Enterprise has continue the FWCS subscription from 01 May 2019- 01 May 2020. The duration of contract is 8 years as stated in the employment contract. 		
Corrective Actions:	Briefing to contractor is schedule in June/July on applicable legal requirement and monitoring of contractor will be conducted during internal audit which is schedule in December 2020.		
Assessment Conclusion:	Corrective action to address previous minor NC was not effectively closed, Thus, the previous minor escalated to Major NC.		

Non-conformity			
NCR Ref #	1874552-202001-N3	Clause & Category (Critical / Minor)	7.12.7 (minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	7/1/2021
Statement of Nonconformity:	Outcomes of this monitoring are not fed back into the management plan for the new planting area of Ex-Quarry which found with slopes more than 25 degree not been control its erosion		
Requirement Reference:	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.		
Objective Evidence:	Based on the Internal Social & Environment Impact Assessment (SEIA) Report (RSPO – New Planting Procedure) SOU 7 Bukit Cheraka Estate; Prepared by: GSQM Department, Sime Darby Plantation Berhad November 2018 – summary of project area: Current field: P01		

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	<p>Nature of Area: Ex-quarry Year of conversion: 2019 Area: 0.8 Ha</p> <p>Under EIA Matrix & Findings – 3.4 Soil erosion and sedimentation of silt:</p> <ul style="list-style-type: none"> - Prohibited activities of oil palm plantation development or clearing - any oil palm plantation development activities or land activities are not allowed on a slope of 25 degree or more - Boundary slope of 25 degree or more shall be measured prior to the development of oil palm plantation activities or clearing activities initiated in the project and must achieve a measurement accuracy of class 3 standard - Measurement plan for slope of 25 degree or more with a minimum scale of 1: 25,000 shall be monitored along with latitude and longitude readings before any oil palm plantation development activities or land clearing activities commence - Boundary slope of 25 degree or more that have been measured, shall be marked on field with red paint and signage installed in conspicuous locations by oil palm plantation development activities initiated in the project
Corrective Actions:	To cease all work at the slope area which will increase the risks on that area. SQM will organize a training on biodiversity and HCV monitoring for SOU Bk Kerayong schedule in June/July 2020
Assessment Conclusion:	Field verification confirms that signage and LCC has been established. There is no operations observed at these areas. The biodiversity management plan has been maintained and monitored. In corrective actions and corrections is deemed sufficient and the non-conformance is effectively address.

Non-conformity			
NCR Ref #	1874552-202001-N4	Clause & Category (Critical / Minor)	3.3.2 (minor)
Closed (Yes / No)	No	Date of nonconformity Closure	Escalated to major NC
Statement of Nonconformity:	Procedures were not fully implemented in accordance with the MQMS		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>The Mill Quality Management System under the Occupational Safety Health Manual, Chapter 9 (Chemical Safety Management) states under No. 6.0 Procedures for Handling, iii. Ensure that containers is properly labelled, not damaged and no spillage during handling.</p> <p>During the site visit at the mill it was sighted 3 unlabelled containers stored with diesel and 3 unlabelled containers stored with lubricant.</p>		
Corrective Actions:	To conduct refresher training on chemical handling and OSH manual to all employee involve with chemical.		
Assessment Conclusion:	Corrective action to address previous minor NC was not effectively closed, Thus,		

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	the previous minor escalated to Major NC.
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Non-conformity			
NCR Ref #	1874552-202001-N5	Clause & Category (Critical / Minor)	6.7.2 (minor)
Closed (Yes / No)	No	Date of nonconformity Closure	Escalated to major NC
Statement of Nonconformity:	First Aid Kits were sighted to contain items without labels and expiry dates.		
Requirement Reference:	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.		
Objective Evidence:	During the site visit the first aid kit was sampled at 3 locations, namely the Workshop, Harvesting Gang and Manual Weeding Gang. The first aid kit handled by the harvesting gang was noticed to have insufficient items inside, as the Dettol was not available in the box. The Dettol Container handled by the Manual Weeding Gang had no label and expiry date attached to it. All 3 First Aid Kits were not monitored regularly to monitor the usage and balance of the supplies.		
Corrective Actions:	<ul style="list-style-type: none"> - Create new monitoring record book and keep by PIC. - Review and revised First Aid Kit Contents and distribute to each First Aid Kit Box To request assist from neighbourhood Medical Assistant (Bukit Cheraka Estate) to do regular check on the usage, first aid kit condition and also to train all the first aid kit representative from each workers gang.		
Assessment Conclusion:	Corrective action to address previous minor NC was not effectively closed, Thus, the previous minor escalated to Major NC.		

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1874552-202001-M1	Critical	6.2.3	24/1/2020	10/4/2020
1874552-202001-M2	Critical	3.6.1	24/1/2020	10/4/2020

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1874552-202001-N1	Minor	4.2.3	24/1/2020	Closed on 7/1/2021
1874552-202001-N2	Minor	2.2.2	24/1/2020	Escalated to major NC
1874552-202001-N3	Minor	7.12.7	24/1/2020	Closed on 7/1/2021
1874552-202001-N4	Minor	3.3.2	24/1/2020	Escalated to major NC
1874552-202001-N5	Minor	6.7.2	24/1/2020	Escalated to major NC
2007911-202101-M1	Critical	2.2.2	7/1/2021	Closed on 6/4/2021
2007911-202101-M2	Critical	6.7.2	7/1/2021	Closed on 6/4/2021
2007911-202101-M3	Critical	3.3.2	7/1/2021	Closed on 6/4/2021
2007911-202101-M4	Critical	6.7.3	7/1/2021	Closed on 6/4/2021
2007911-202101-N3	Minor	3.4.2	7/1/2021	"Open"
2007911-202101-N3	Minor	3.5.2	7/1/2021	"Open"
2007911-202101-N3	Minor	2.1.2	7/1/2021	"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 *Bukit Kerayong Palm Oil Mill and supply base* Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

List of Stakeholders contacted	
Internal/External Stakeholders Field/estate workers Mill workers Gender committee	Union/Contractors OCP (outside crop purchase) Contractor
Government Departments Headmaster and school representative SJK (T) Ladang Braunston SJK (T) Jalan Acob	NGO -

SJK (T) Brafferton	
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Stakeholders comment	
1	<p>Feedbacks: <u>Local Community Head (Taman Sri Kerayong)</u> Feedback raised with regards to drain cleaning and desilting progress near Taman Seri Kerayong. This normally an annual event as to avoid flooding and impacting neighboring area. Boundary area with the estate also required cleaning and maintenance as the area upkeeping was not up to date.</p> <p>Management Responses: Estate management acknowledged the concern raised by the community head. These issues incorporated in the SIA management action plan for 2021. Progress work is on-going and will be completed in due time.</p> <p>Audit Team Findings: Verified the issue and action plan by the estate management team. No further issues.</p>
2	<p>Feedbacks: <u>OCP @ Outside Crop Purchase/Smallholder/collection center</u> Newly invited as part of FFB supplier for Bukit Kerayong POM. Payment cycle currently made for 3 times per month. No late payment issues reported.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further information.</p>
3	<p>Feedbacks: <u>SJK (T) Ladang Braunston, SJK (T) Jalan Acob and SJK (T) Brafferton</u></p> <ol style="list-style-type: none"> 1. Headmaster of SJK (T) Brafferton highlighted a few concerns on school/football field and drain maintenance. Road conditions to school quite slippery due to muddy road. Drain maintenance has yet to done to avoid flooding. 2. Headmaster of SJK (T) Jalan Acob has requested for drain cleaning and football field grass cutting. 3. Headmaster of SJK (T) Braunston highlighted the issue with regards to road condition and football field grass cutting. <p>Management Responses: Estate management acknowledged the concern raised by school headmaster. Some of the feedbacks were in verbal. Any request must be formal @ in writing to the management. However, some of the issues have been incorporated in the SIA management action plan for 2021.</p> <p>Audit Team Findings: Verified the issue and action plan by the estate management team. No further issues.</p>
4	<p>Feedbacks: <u>Contractors</u> There is no late payment issue from Estate to contractors. Agreement is valid and signed by both parties. Contractor workers' pay slip were kept in office.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further information.</p>
	<p>Feedbacks:</p>

5	<u>Gender Committee</u> No sexual harassment case reported. New mother’s need assessment was conducted concurrently during the gender committee meeting. Meeting and activities were actively conducted and participated by the members.
	Management Responses: Noted on the information.
	Audit Team Findings: No further information.

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
Not applicable as all estates has the 2 cycle of planting.					



Previous land owner / user comment	
1	Feedback: N/A
	Management Response:
	Audit Team Findings:

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

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Bukit Kerayong POM and supply bases has complied with the RSPO Principles and Criteria 2018 for Sustainable Palm Oil (<i>RSPO P&C MYNI 2019</i>) 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 Bukit Kerayong POM and supply bases is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Zainal Abidin	Name: Noor Arizan bin Ahmad
Company Name: BSI Services (M) Sdn Bhd	Company Name: Sime Darby Plantation Berhad
Title: Lead Auditor	Title: Senior Manager
<p>Signature:</p> 	<p>Signature:</p> <p><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></p> 
Date: 11th June 2021	Date: 17th June 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	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Documents required for all unit of certification available in Bukit Kerayong POM Certification Unit:</p> <ul style="list-style-type: none"> • Land titles/user rights • Occupational health and safety plans • Plans and impact assessments relating to environmental and social impacts • HCV documentation • Pollution prevention and reduction plans • Details of complaints and grievances • Continuous improvement plans, • Public summary of certification assessment report • Group Sustainability Policy <p>Record of contributions to community development</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>SOU7 has conducted combined meeting with the stakeholder to share any new information on RSPO certification, environmental, social, safety and legal requirement applied to all operating units. All the stakeholders have raised some issue and discussed with the management during the meeting.</p>	Complied

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1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>External stakeholder meeting was carried out by reaching out the stakeholders for any arising issues The plan is to carry out in December 2020 and postponed due to COVID-19 as Kapar/Klang declared as red zone area. Letter sent to the stakeholders on the postponement and they need to return any issue/comment/suggestion to the estate management. Letter dated 15/12/20 was verified. This will be used for the inputs on the establishment of SIA management plan.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The mill and estates List of Stakeholders are available detailing the relevant stakeholders. Stakeholders includes Contractors, suppliers, FFB suppliers, government agencies, non-governmental agencies and local communities.</p>	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English.</p> <p>The latest Group Sustainability & Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of</p>	Complied

		Business Conduct (COBC) signed by Group Managing Director on 02/12/2019.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	The overall compliance of the ethical business practice is governed by SDP Group Compliance (GCO) and Group Fraud & Corruption Risk Management (GFCRM). - The personnel from GCO and GFCRM have access to all departments, functions and area of SDP Group to monitor the compliance and implantation. All management and employees are given the authority to report GCO if any known breaches of compliance obligations. For example the latest training for COBC was carried out on 9/1/20 at Bukit Cheraka Estate. Other policies briefing was carried on 8/1/20.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	Compliance on the following legal requirements were verified: 1. The Department of Environment license was verified. The effluent discharge is within limits and monitored as per the license. The competent person has been identified to be Mill Assistant Manager, Khairul Shahrin. The field training record was submitted to DOE to be approved as Certified Environmental Professional in the Treatment of Palm Oil Mill Effluent (CePPOME). 2. The Department of Environment license was verified. The Continuous Emission Monitoring System (CEMS) for boiler stake on particles and carbon monoxide for new boiler is not yet available. However the submission for application on the new boiler's CEMS to the DOE is available.	Complied

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		The internal audit conducted for Bukit Cheraka Estate in November 2020 has identified non-compliance of maintaining e-Swis records under the EQA 1974.	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -	<p>SOU26 had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4a: Procedure for Legal and Other Requirements dated 1 November 2008. Tracking of changes is by Sime Darby SQM team disseminated to all SOU.</p> <p>A minor NC was raised related to the below issues;</p> <ol style="list-style-type: none"> 1. Scheduled Waste Regulation 2005 requires training to be provided 2 years once and Occupational Safety and Health (Noise Exposure) Regulation 2019 requires training to be provided. No training was provided at mill. However, the summary of compliance shows all regulations are 100% compliance. 2. As according to the Bukit Cherekah Estate internal audit, an OFI was raised regarding maintaining the e-Swiss was not complying with EQA 1974. However in the Legal Other Requirement Register – Summary of Compliance, it was stated that 100% compliance on EQA 1974 (Scheduled Waste) Regulation 2005. 	Non-compliance
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	<p><u>Bukit Kerayong Oil Mill</u></p> <p>The mill land title was under Bukit Kerayong Estate. The mill located in lot 2894 with land title no. 52712. Mill boundary was clearly demarcated with fences.</p>	Complied

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		<p><u>Bukit Kerayong Estate</u> During site visit in Main Division at filed 09B, neighbouring with smallholder estate. Clearly marked with red colour and visible. Another one sampled in Jalan Akob Division, by the road side (Jalan Hj. Mohd Ikram) adjacent to Bukit Kerayong Oil Mill (Field 02A). Also clearly marked with red ink and visible. no planting beyond these legal or authorised boundaries.</p> <p><u>Bukit Cheraka Estate</u> The legal boundary was clearly demarcated with security trenches as as sighted at field P17A adjacent with Lambun Estate and field P19B adjacent with Taman Pekerti. This was sighted during site visit</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>The list of contracted parties at the mill and estates are made available in the List of Stakeholder. The contracted parties include for labour resources, FFB supply and short term vendors.</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>Contract with Landta Rasmi Sdn Bhd dated 07/08/2020 and Ikrar Intergiti Vendor (Vendor Integrity Pledge on Vendor Code of Business Conduct (VCOBC)) addendum is in place to demonstrate agreement between SDP and vendors had include specific clauses to meet applicable legal requirements. In section 3 of the VCOBC stated the vendors are obliged to familiarise themselves with and adhere to all applicable policies, procedures, laws and regulation of the countries in which they operate. Below non-compliances was observed; i) Reviewed the pay slips and Daily Oil Mill Declared Weight – By Delivery Note for September 2020 found that 4 of the contractor’s workers (FFB transporter) in Bukit Kerayong Estate have worked on</p>	Complied

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		<p>rest day for 3 days without paying according to Employment Act 1955. The sampled workers as below: I/C No. :730622-10-55XX, 890911-10-51XX, 711125-10-64XX and 650128-10-68XX Date of Work on Rest Day – 06/09/2020, 13/09/2020 and 27/09/2020 ii) Contract between KSG enterprise and workers have not detailed out the terms and conditions and compliance toward Employment Act 1955 requirements. Previous minor was not effectively closed and upgraded to major NC</p>	
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. - Minor compliance -</p>	<p>Contract with Landta Rasmi Sdn Bhd dated 07/08/2020 and Ikrar Intergiti Vendor (Vendor Integrity Pledge on Vendor Code of Business Conduct (VCOBC)) addendum is in place to demonstrate agreement between SDP and vendors had include in clause 5.7 and 5.8 to abolish child labour, forced labour and trafficked labour.</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>SOU 7 has downgraded from Identity Preserved to Mass Balance since July 2020. All the directly sourced FFBs are independent estates/out growers. The list of the suppliers with MPOB License and geo-location is available and maintained.</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p>	<p>For indirectly sourced FFBs through traders or collection centres, SDP has identify plans under the Responsible Sourcing Guidelines to collect data of the smallholders that are supplier to the traders</p>	Complied

	- Minor compliance -	or collection centres. On annual basis, SDP will visit minimum 10 smallholders to collect the information.	
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><u>Bukit Kerayong Oil Mill</u></p> <p>The mill has established forecast business plan for five financial years from FY 2019 till 2025 as guideline for the mill to run the operation. Plan was review on annually basis. The plan covers the Mill Production (Mill Intake – Oil Palm, Production Crude Palm Oil, Production Palm Kernel, Total Palm Oil Extraction & Total Palm Kernel Extraction), Reception, Fruit Handling, Sterilization, Threshing, Pressing, Clarification, etc.</p> <p><u>Bukit Kerayong Estate and Bukit Cheraka Estate</u></p> <p>Both estates documented a business management plan using MPLAN Forecast (Ex-estate Cost – Excluding manuring, Admin Paid By HQ and Depreciation). The MPlan Forecast projects the Crop – Oil Palm, CPO, PK, OER, KER, YPH, Direct Cost and Fixed Cost. For FY 2019-2025.</p>	Complied
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>There was no replanting programme in Bukit Kerayong Estate as claimed. In Bukit Cheraka Estate Annual Replanting Programme was established as sighted covering FY 2021 till FY 2025.</p> <p>FY 2021: 93.03 Ha at Field E1671998A (2021A)</p> <p>FY 2022: 48.87 Ha at Field E1671997A (2022A)</p> <p>FY 2023: 180 Ha at Filed E1672001 (2023A)</p> <p>FY 2024: 95.19 Ha at Field E1672001E (2024A)</p>	Complied

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		FY 2025: 65.40 Ha at Field E1672001D (2025A), 50.21 Ha at Field E1672001C (2025B)	
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	<p>Management Review was conducted by mill management on 30/12/20 at Bukit Kerayong Oil Mill Meeting Room. Attended by Senthikumaran /G (Mill Manager)-absent, Md Kamal b. Arsad (Sr. Asst), Mohd Hafiz Md Hashim (Asst Engineer) and 13 others. Among discussed included results of previous audit, customer feedback, status of corrective and preventive action taken, follow up from previous management review, changes that will affect the management system, continual improvement and resources required. Sampled also another Minutes of Management Review conducted in 27/06/19.</p> <p>The management review was conducted in December 2020 attended by 14 members. The meeting was chaired by Sr Estate Manager. The minutes of meeting indicated that Internal audit findings were each thoroughly examined and the corrective action plan were discussed.</p>	Complied
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.			
3.2.1	(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. - Critical (Major) compliance -	<p><u>Bukit Kerayong Oil Mill</u></p> <p>Available Initiative List, the proper action plan for the initiative to be implemented with clear time line and PIC responsible to implement and monitor need to be enhanced for getting additional revenue and profit with getting more FFB, reduce the consumption of CaCO3, improve Kernel Extraction Rate and reduce electricity and water bill.</p> <p><u>Bukit Kerayong Estate</u></p>	Complied

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		<p>Continuous Improvement Plan FY 2021 was approved by Mohd Muzafar b. Omar Basiron (Estate Manager):</p> <ul style="list-style-type: none"> i. Water management-SOP for Water Management, water zoning, retention, irrigation, reticulation (Jan 21-Dec 22) PIC: Mohamad Zubair Roslan. ii. Crop Quality – reduce unripe bunch percentage to below 1% (Jan 21-Dec 21) PIC: Abdul Aziz Ibrahim & Zulkifli Abu Bakar iii. Increase Crop Percentage to above 90% (Jan 21 – Dec 21) PIC: Abdul Aziz Ibrahim & Zulkifli Abu Bakar 	
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>Report of the Palm GHG Version 4, ACOP latest for 2019 were made available for verification</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. Palm Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference</p>	Complied

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		<p>Manual) covers land preparation, planting material, upkeep, harvesting, transport etc.</p> <p>Noted updated procedure under RSPO SCCS procedure: iii) RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version: 2, issue: 5 dated April 2019.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>Sime Darby has established a system to monitor the mill and estate operation. The Structured Oil Recovery Assessment (SORA) (for Mill) / Structured Crop Recovery Assessment (SCRA) (for estates) and Planning and Monitoring Unit visited the operating units quarterly. Their reports covers on all aspect of operation. In addition, visit by agronomist was made yearly. The report focusing on rainfall, yield [performing and underperforming], palm nutrition status, field observation agronomic matters and fertilizer recommendation has been included in the report. All the reports of monitoring were available at estate and mill office for references.</p> <p>Plantation Advisory Department, Performance Monitoring Unit, Quality Management Unit (PSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Third party visit/inspection was also done as part legal compliance monitoring.</p> <p>The below non-compliances were observed;</p> <p>1. The disposal of filters, contaminated rags and gloves at mill is not according to the MQMS – Handling of Environmental Aspects. The filters, contaminated rags and gloves shall be disposed as scheduled waste. However it was found that it was disposed in a</p>	<p>Non-compliance</p>

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		<p>mixed bin located at the sterilization station next to the scheduled waste store.</p> <p>2. The determination of environmental impacts at Bukit Kerayong Estate are not according to the EQMS – Environmental Aspect / Impacts Evaluation Procedure.</p> <p>a. EIE2020/01/09/FWE/03 – the frequency of transporting chemical and workers is identified as 3. However, this activity frequency should be daily.</p> <p>b. EIE2020/01/11/PWR/10 – it was identified there is high compliance potential of non-compliance to environmental regulation. However there is no EMP been developed for this activity.</p> <p>c. EAI/2020/01/01/FWE/01 – the identification of regulation is not accurate. The regulation referenced is OSHA (Use and Standards of Exposure of Chemical Hazardous to Health).</p> <p>Escalated from minor.</p> <p>Previous minor was not effectively closed and upgraded to major NC.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Monitoring of SOP implementations are conducted by Group level. Records sighted includes:</p> <ol style="list-style-type: none"> 1. Plantation Advisor Report dated 07-09 September 2020 2. Internal audit conducted on 25/11/2020. 3. General Manager visit report dated 11/06/2020 4. Quarterly Safety Inspections 	Complied
<p>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.</p>			

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<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -</p>	<p>There is no new planting in SOU 7. Social Impact Assessment (SIA) report dated 2-4/11/2015 was verified. Assessment was done by Social & Environmental Project Unit, PSQM Department. Internal and external stakeholders were consulted during the assessment. The assessment was used methodology of interview workers based on workstation, harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government & School. The secondary data collection – document review/file checking also been made. The report includes both positive and negative impact and its recommendation. At Bukit Kerayong Estate, for existing planting, Environmental Aspect Impact and Environmental Impact Evaluation (EAI/EIE) was completed and reviewed on 05/01/2020. However please refer to 3.3.2. At Bukit Kerayong Estate, for land conversion of abandon housing (new planting), SEIA was completed in December 2018. The land conversion of 1.64 ha does not significantly affect workers as the area is an abandon housing area. As per the report, relevant personnel was interviewed</p>	<p>Complied</p>
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance -</p>	<p>There is no new planting in SOU 7 (Bukit Kerayong POM Certification Unit). The assessment was used methodology of interview workers based on workstation, harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government & School. The secondary data collection – document review/file checking also been made. Inputs from stakeholders (internal and external) from OCP meeting 18/11/20, union meeting 29/12/20 were not included in the development of management and monitoring plan. Based on the</p>	<p>Non-compliance</p>

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		<p>SIA plan for FY2021, non of the above issues included in the management plan Thus, a inor NC was raised. The Environmental Management and monitoring plan for Bukit Cheraka was audited. The management plan was established according to the EAI / EIE. Samples reviewed includes:</p> <ol style="list-style-type: none"> 1. Impact of air pollution from vehicle was identified to be 220. The management plan for preventive vehicle is identified. 2. Impact of domestic waste was identified to be 290. The management plan includes awareness program to workers, waste collection and monitoring of disposal conditions at housing area. 	
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>Social Impact Action Management Plan based on the SIA and issues raised through the gender committee, internal and external communication.</p> <p>Bukit Kerayong Estate: SIA Management Action Plan 2021 dated 4/1/21 has detailed out some the issues such as: <u>SJK(T) Ladang Brafferton (external stakeholder)</u> Road access and conditions: Damage government road to first point entry (FPE), which causing vehicle breakdown. Action Plan: Repair work is on-going. Status: 70% road patching work done. PIC: Estate Assistant <u>Taman Sri Kerayong</u> Drain and boundary maintenance issue. Action plan: On-going pending for budget approval. Status: Manual slashing and</p>	<p>Complied</p>

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		<p>uprooting (woodies) done for temporary measures. PIC: Estate Assistant <u>SJK(T) Ladang Jalan Acob</u> Blocked drainage around school. Grass cutting round delayed. Action plan: School need to request officially in writing. Status: On-going. PIC: Estate Assistant</p> <p>Bukit Cheraka Estate: SIA Management Action Plan 2021 dated 18/12/20 has detailed out some the issues such as: <u>Internal/workers related issues</u></p> <ul style="list-style-type: none"> i) Potholes at line site – Action plan: repair work will be carried out as soon as weather permits (dry season). Status: On-going ii) Complaints on disturbance related to stray dogs and cattle at housing area – Action plan: Liaise with Kuala Selangor Municipal Council and meeting with cattle owners to discuss and come out with solution. Status: On-going, PIC: Estate Assistant <p>The environmental management and monitoring plan for Bukit Cheraka was last reviewed on 02/01/2021. The plan was reviewed based on the impact identified in EAI/EIE. Since there is no significant failure of the plans, no significant changes of the plan was identified as compare to previous review.</p>	
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p>	<p>SDPSB has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019, where the management is committed to contributing to a better society includes respecting, upholding & no-exploitation of</p>	Complied

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	<p>- Minor Compliance -</p>	<p>fundamental human rights, providing safe and healthy workplaces and protecting workers' welfare and engaging and empowering communities.</p> <p>The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liason and recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre and estate are available upon request.</p>	
<p>3.5.2</p>	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liaison and recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre (WMC) and estate are available upon request. This procedure been explained to worker during the induction training on their first-time arrival.</p> <p>Verified new local worker employment, date joined: 2/9/20. Referring to the latest inter-office mail dated 3/12/19 by Head of HR Upstream, newly revised contract for new local recruits and existing local workers issued under enclosure 1 – new recruitment – Peninsular Malaysia and enclosure 4 – existing employee – Peninsular.</p> <p>No evidence of written confirmation issued in writing after 3 month of joining date as per the employment contract. Employee ID 0000159742.</p> <p>Enclosure 4 was not available for existing local workers. Employee ID: 0000009838</p>	<p>Non-compliance</p>

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		Employee ID: 0000029579	
		Thus, a minor NC was issued	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance –</p>	<p>Risk Analysis was revised on 01/11/20 for Boiler Operation as sighted for accident occurred on 18/10/20 involving Mohd Afif b. Haidzir Sham (Boiler Operator) at Boiler platform. 7 days MC (18/10/20-26/10/20). Observed scored 4 (Medium) and scored 8 (medium) to be further enhanced with clear action plan (Control measures) as reference to appropriate tools and SOP established. PIC and dateline to be further improved and defined for better implementation.</p> <p>HIRARC Bukit Kerayong Oil Mill FY 2020 was prepared by Zahariman Saleh (Supervisor) and reviewed by Mohd Hafiz Md Hashim (Asst 1) and acknowledge by Senthilkumaran AL Gopal (Mill Manager) mostly discussed about Covid-19 Monitoring. The risk can lead to sick and infected. Risk or Working From Home (WFH) that have potential risk such as psychosocial, ergonomic hazards to be further considered in future review.</p> <p>In Level 2 of The Standard Operating Manual (SOM) under Appendix 5.4.1a Hazard Identification, Risk Assessment & Risk Control (HIRARC) Procedure issued date 01/04/08. Version 01.</p> <p>The priority for Risk Level Medium, scored 4-10 mentioned current risk control measure may need to be improved. And high risk, score 11-16 mentioned immediate action required to control the hazard or stop operation.</p> <p>During site visit in the mill, observed group of workers standing close to a suspended load (Cage) and available a buzzer/emergency light installed for warning purpose.</p>	Complied

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		<p><u>Bukit Kerayong Estate</u></p> <p>Available Organization Chart (Hirarc Team) Bukit Kerayong 2020. Chairman is Estate Manager. Hirarc for SOU 07 Bukit Kerayong Estate for FY 2020 approved 09/01/20 by Estate Manager. Hirarc was reviewed 25/12/20 as a result of motorcycle accident but risk assessed as 4 (Medium).</p> <p>Sampled harvesting activity (fond stacking and loose fruits collector) Job Step (Trimming bunch stalk and aligning bunch) risk score 6 and 9 but without clear proposed action plan.</p> <p>Similar Hirarc sighted in Bukit Cheraka Estate reviewed 7 times as a result of accident occurred in 2020. However the management and Hirarc team to further study the current risk controls and proposed new control measures and motorcycle accident in the estate operation recurring and need a better solution.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>OSH Management Plan 2020 for Bukit Kerayong Oil Mill was established and Safety and Health Committee has conducted Safety and Health Inspection at workplace as required by the regulations related to Safety and Health Committee 1996.</p> <p><u>Bukit Cheraka Estate</u></p> <p>Available OSH Performance Monthly Report as sampled for October 2020 created 09/11/20 and September 2020 created 07/10/20.</p> <p>Part 1: Total Employees & Working Hours Part 2: Non-Human Suffering Part 3: Non-Occupational Incident Part 4: Environmental Incident & Legal Non-Compliance Part 5: Monthly Accident Rates</p>	Complied

		<p>Workplace Inspection was conducted dated 26/11/20 (94.46 Excellent), 29/08/20 (98.21% Excellent), 29/06/20 (98.46%), 07/01/20 (98.68% Excellent). Covering all operational activities/area.</p>	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<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. - Critical (Major) compliance –</p>	<p><u>Bukit Kerayong Palm Oil Mill</u> Available Training Need and Plan Form 2020 in Bukit Kerayong Oil Mill for staff (Mohd Hafiz (Asst), Khairul Shahrin (Asst), Md. Kamal (Asst), Zaharman (QA), Vijay (Supervisor), Balasaravanan (Lab), Letchumy (W/Bridge Clerk), Kavitha (W/bridge Clerk). Training Plan for FY 2020 SOU 07 Bukit Kerayong Oil Mill. Among planned:</p> <ul style="list-style-type: none"> • OSH Act and Regulation (Jan) • Hirarc (Jan) • Scheduled Waste Mgt (Jan) • First Aid (April) • RSPO/MSPO (Jan) • Fire Fighting (Apr) • EHS Committee and Function (Apr) • Accident Investigation Technique (Aug). <p><u>Bukit Kerayong Estate</u> Available Training Matrix FY 2020 Sou 07 Bukit Kerayong Estate. Included list of competency (Training requirements for operating units) and positions (Manager Sr. Asst, Asst, - Osh Committee, Auxilliary Police and contractor)</p>	<p>Complied</p>

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		<p><u>Bukit Cheraka Estate</u> Available Training Plan for 2021 and Training Matrix year 2020. (Training requirements for operating units) and positions (Manager Sr. Asst, Asst, - Osh Committee, Auxilliary Police and contractor)</p>	
<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p><u>Bukit Kerayong Palm Oil Mill</u></p> <ul style="list-style-type: none"> • Townhall session (Pekerja selamat, sihat dan sejahtera) was conducted on 21/08/20 attended by 63/73 workers (86%)- Covid-19, OSH, Obesity, Sexual harassment, workplace accident. • Emergency drill was conducted on 02/11/20 between 8.30-9.30pm. Involved 33 workers. • Basic Outbreak First Aid First Aid, CPR & AED was conducted on 29-30/20 at Sime Darby Acedemy, Carey Island. (Mohamad Khairul Shah, Vijay Subramaniam, • IPM leaf pest in oil palm plantation training dated 29/09/2020 • Water Management and irrigation training dated 19/08/2020 • Mechanical Buffalo Scissor Lift handling training dated 21/02/20. • Mandatory training (Scheduled Waste, Noise Induced Hearing Loss) was not conducted. (Legal Compliance) <p><u>Bukit Kerayong Estate</u></p> <ul style="list-style-type: none"> • First Aid and Fire Fighting Training was conducted on 19/11/20 at Bukit Keratong Estate. Attended by 20 workers. • Trunk Injection (Acephate Insecticide) SOP Briefing/training at Main Office attended by 11 workers. Trained by Manager. 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Training and Briefing for Sprayers conducted by MuCrop on 21/08/20 attended by sprayer as photo sighted. • Training on IPM Leaf Pest for Sou 06 & 07 on 29/09/20 trained by PNP-CER. • Water Management and Irrigation training conducted on 19/08/20 attended by 2 Assistant (Mohamad Firdaus, Bibi Safina, Mohd Amirrudin). • MBSL Training attended by 7 workers. • Briefing and training for cutters on 21/02/20 attended by 15 cutters. • Safety Briefing and SOP conducted on 02/01/2020 attended by 18 workers. <p><u>Bukit Cheraka Estate</u></p> <ul style="list-style-type: none"> • Trunk Injection training on 30/10/20 attended by 8 workers. • PPE Training on 29/10/20 attended by 19 workers. • IPM (Bagworm, Nettle Carterpillar) Training was conducted on 29/09/20. • Basal Prunning Training was conducted on 20/09/20 attended by 7 workers. • First Aid Training was conducted on 05/11/20 attended by 8 store clerk, mandore, foreman, field officer. • COBC and whistleblowing training dated 09/01/2020 • was conducted on 18/01/20. • Harvester, training, Whistle blower, company policy briefing was conducted in 2020. • Bunch census SOP training dated 03/01/2020 	
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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>Relevant personnel to supply chain implementation as defined by the OU are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor & assistant, weighbridge operators.</p> <p>The latest RSPO SCCS training was carried out as follows:</p> <ol style="list-style-type: none"> 1. RSPO/MSPO SCCS for mill personnel involve in SCCS training dated 29/6/20 2. RSPO SCCS for contractor training dated 12/11/2020 3. OCP training dated 27/7/20 	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>Bkt Kerayong POM initially under Identity Preserved module where there were only two (2) supplying estates namely Bukit Kerayong and Bukit Cheraka Estate. Starting from August 2020 onwards, mix of uncertified FFB from OCP @ Outside Crop Purchase from direct and indirect suppliers. Bukit Kerayong POM is no longer maintaining the IP module and downgraded to MB module.</p>	Complied
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 and 3rd party certified supply base. In that scenario, the mill can claim</p>	<p>Bukit Kerayong Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-</p>	Complied

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	only the volume of oil palm products produced from processing of the certified FFB as MB.	certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	
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. The 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 from last audit date (January – December 2020) recorded annual surveillance report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The registration of PalmTrace will be carried out by the Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Company has registered their mill in the PalmTrace:- Members ID – Sandakan Oil Mill: RSPO_PO1000000155 Licence valid until 14/6/2021 Member category : Oil Mill Details of palm trace transaction summarized under table C of the report.	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).	SOP for Sustainable Supply Chain and Traceability, Issue No 5, Dated April 2019 which covered control of documents and records, delivery of FFB from the estate, receiving FFB at the mill, process monitoring, CPO and PK despatch, non-conforming material/product, product claims, production volume, conversion factor, internal audit, outsourced contractor, training, reclassification of mill’s supply chain model, complaints and management review. Bukit Kerayong Palm Oil Mill has prepared a dedicated records and Forms in relation to RSPO Supply Chain Certification.	Complied

	<p>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</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>Sustainability training plan & records for year 2020 sighted available during the audit. The training was conducted on 29/06/2020. Interview with weighbridge operator found that she understands on the supply chain for palm oil mill.</p> <p>SOP for Sustainable Supply Chain and Traceability, Issue No 5, Dated April 2019 has identified every responsible personal who involved in the implementation RSPO Supply Chain Certification. Roles and responsibility for RSPO Supply Chain team were clearly defined clause 4.0 responsibilities under the Head of Operating Unit. Through the interview with Mill Assistant, he can demonstrate awareness of the established procedure.</p> <p>Bukit Kerayong POM is Mass Balance POM therefore, the mixing of FFB is allowed.</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>Addressed in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 18.0 Internal Audit. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP.</p> <p>Combined internal audit for supply chain was last conducted on 23/11/2020 by 2 internal auditors from Group Sustainability and Quality Management Department. No non-conformity for RSPO SCCS was raised during the internal audit.</p> <p>The results of Internal Audit were discussed in the Management Review Meeting as sighted in minutes meeting conducted on 30/12/2020.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p>	<p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in</p>	<p>Complied</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>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>order the FFB to be received by the mill. E.g. of information available in the DO is as follows:</p> <ul style="list-style-type: none"> • Consignment note no. (025389) • Estate’s names (Bukit Kerayong Estate) • Date & time of delivery (24/7/20) • Field No. (14B) • No. of bunches (1,129 bunches) • Vehicle no. (BEB4730) • Net weight (10.27 mt) <p>In estate’s consignment note, details of RPPO certificate number available for verification. RSPO cert. no. (RSPO 550181)</p> <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> • Name of estates (Bukit Cheraka Estate) • Field No. (2001, 2006) • Vehicle no. (BEE9125) • Date (17/12/20) • Total bunches (624 bunches) • Net weight (10630 kg) <p>Diversion from SOU8 (East POM certification unit) estate;</p> <ul style="list-style-type: none"> • Consignment note no. (022716) • Estate’s names (Sepang Estate) • Date & time of delivery (14/5/20) • Field No. (03C) 	
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		<ul style="list-style-type: none"> • No. of bunches (1,064 bunches) • Vehicle no. (KEK9981) • Net weight (20.81 mt) <p>RSPO certificate no.: RSPO 543543</p> <p>Addressed in the SOP clause 10.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: MB to conventional.</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"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; 	<p>Bukit Kerayong POM ensured the required information is available in document form as below:</p> <p><u>RSPO PK IP</u></p> <ol style="list-style-type: none"> a) The name and address of the buyer – XXX b) The name and address of the seller – KKS Bukit Kerayong c) The loading or shipment / delivery date; 30/12/20 d) The date on which the documents were issued; dispatch ticket (012592), dated 30/6/2020 <ol style="list-style-type: none"> a) RSPO certificate number – RPSO PK IP b) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); RSPO PK IP c) The quantity of the products delivered; 26.70 mt d) Any related transport documentation; contract no. S/C-PSD/2006/PK0863. e) A unique identification number: TR-42cb9d6b-fa39 	Complied

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	<ul style="list-style-type: none"> h) Any related transport documentation; i) A unique identification number. 	<p><u>RSPO CPO IP</u></p> <ul style="list-style-type: none"> a) The name and address of the buyer – XXX b) The name and address of the seller – KKS Bukit Kerayong c) The loading or shipment / delivery date; 15/6/20 d) The date on which the documents were issued; dispatch ticket (012515), dated 30/6/2020 e) RSPO certificate number – RSPO 550181 f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); RSPO CPO IP g) The quantity of the products delivered; 38.35 mt h) Any related transport documentation; contract no. S/C-PSD/2006/CPO0790 i) A unique identification number: TR-128a641f-6a54 	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> 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 ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 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 	<p>Mill is not outsourcing any of mill activities. The independent third parties involve in Mill operation is only transportation services for CPO and PK. Sighted the agreement between Sandakan Bay POM and all suppliers and contractors dated 20/07/2020. Mentioned that all contractor needs to follow RSPO/MSPO/SCCS requirements in accordance with the Sime Darby Plantation Bhd Management System and additional from that, all contractor shall ensure to reserve the right of the certification body to audit the outsourcing activities and ensure to provide relevant access for duly accredited CBs to your respective operations, systems and any and all information when this is announced in advance. Sighted that FGV</p>	Complied

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	<p>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>Transport Services Sdn Bhd has signed the agreement on 12/12/2020, ref: T/SDP/PEN/CPO/0720/003</p>	
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>The list of outsourced contractors was sighted, "list of stakeholders" to include the transport contractor for CPO and PK (FGV Transport Services Sdn Bhd). The independent third parties involve in Mill operation is only transportation services for CPO and PK</p>	Complied
3.8.11	<p>The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.</p>	<p>No new contractor used for the processing or physical handling of RSPO certified oil palm products (transportation).</p>	Complied
3.8.12	<p>Record keeping</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification. As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained minimum of two years.</p>	Complied

	<p>iv) For Mass Balance Module, the mill:</p> <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). 		
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>	The oil extraction rate (OER) and the kernel extraction rate (KER) for Bukit Kerayong POM is determined and set their own extraction rates based upon past experience, documented and applied consistently.	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	For the last review period, OER and KER:	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>	Not applicable as Bukit Kerayong is no longer under Identity Preserved module.	Not Applicable
3.8.16	<p>Registration of Transactions</p> <ul style="list-style-type: none"> 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 	Shipping Announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not within three months after	Complied

	<p>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>dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>There is no claim on RSPO SCCS used in Bukit Kerayong POM</p>	<p>Complied</p>
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>	<p>No off-product claim made by Bukit Kerayong POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).</p>	<p>Complied</p>
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>Not applicable as no off-product claim made by Bukit Kerayong POM as to date.</p>	<p>Complied</p>
4.3	<p>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.</p>	<p>Not applicable as no off-product claim made by Bukit Kerayong POM as to date.</p>	<p>Complied</p>

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4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Bukit Kerayong POM as to date.	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 evidence of RSPO corporate logo used by Bukit Kerayong POM and verified through document and site review (notice board, business card, shipping documentation, etc.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication was demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	As per interview with weighbridge operator, she said that the weighbridge ticket will be stated the info i.e: product/commodity with SCC model (Crude Palm Oil RSPO MB) and will stamp the RSPO certificate number. Verified the documents found that the supply chain model and certificate number were stated on the ticket.	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: 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.	Bukit Kerayong POM was not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
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.	Bukit Kerayong POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Bukit Kerayong POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Bukit Kerayong POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Bukit Kerayong POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Bukit Kerayong POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Bukit Kerayong POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Bukit Kerayong POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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	Bukit Kerayong POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable

	<p>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.rsपो.org.</p>		
<p>MODULE B – MASS BALANCE SPECIFIC RULES</p>			
<p>Minimum Mass Balance content</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>
<p>Labelling and trademark (MB)</p>			
	<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 	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>

	<p>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.</p> <ul style="list-style-type: none"> • 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. 		
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. • 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. • 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. • Messaging NOT ALLOWED in storytelling in product-related communications: 	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</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. 		
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>SDPSB has implemented a Sime Darby’s Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance to the United Nations declaration on Human Rights Defender.</p> <p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. The policy was communicated through the muster briefing/training to workers as below:</p> <ul style="list-style-type: none"> Chaah Estate: 06/07/2020 Bukit Kerayong Estate: 15/07/2020 Bukit Cheraka Estate: 9/1/2020 <p>It was also communicated to the external stakeholder through stakeholder consultation and company website.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>SDPB has implemented Group Sustainability and Quality Policy Statement dated 02 Dec 2019 where the management is committed to contributing to a better society:</p> <ol style="list-style-type: none"> Respecting, upholding & no-exploitation of fundamental human rights. Providing safe and healthy workplaces and protecting workers’ welfare. Engaging and empowering communities. <p>This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.</p>	Complied

Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</p> <p>Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The policy was communicated through the muster briefing/training to workers as below:</p> <p>8-9/1/20 – Bukit Cheraka Estate</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Sighted the External Complaint Book have the agreed resolution within timeframe. There was no other major complaint other than housing maintenance issues.</p> <p>Sample taken as below:</p> <p><u>Bkt Kerayong POM</u></p> <p>19/08/20 - House no. 29: Broken toilet pipe.</p> <p>18/7/20 – House no. 34: Sink/kitchen lamp malfunction. Outdoor water pipe leaking. Tank water overflow.</p> <p><u>Bukit Kerayong Estate</u></p> <p>19/10/20 – Frame and bedroom door, house no. 4. Repair completed on 23/10/20.</p>	Complied

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		<p><u>Bukit Cheraka Estate</u></p> <p>8/12/20 – Door lock malfunction (front and back door), house no. 45. Repair work completed on 10/12/20.</p> <p>16/12/20 – Roof leaking and window glass broken, house no. 45. Repair work completed on 16/12/20.</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>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.</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>Bukit Kerayong POM certification unit have contributed to the internal and external stakeholders.</p> <p>As a group, the CSR was included in: http://www.yayasansimedarby.com/our-projects/community-health</p> <p>For example, the management has contributed and supported the activities such as request as below:</p> <ul style="list-style-type: none"> • Food supply distribution during MCO • Monthly rice contribution to workers • Community service for Parole 2. 	Complied
<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>			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free,</p>	<p>SOU7 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates</p>	Complied

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	<p>Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>has a list of all its land titles which have the information about names of lease, hectare, terms & conditions, lease period and grant numbers. Copies of the land titles were available at the estate's offices while the original were kept at headquarter</p> <table border="1" data-bbox="1137 499 1921 1377"> <thead> <tr> <th>Estate</th> <th>Land title</th> <th>Land use type</th> <th>Tenure</th> </tr> </thead> <tbody> <tr> <td>Bukit Kerayong Estate</td> <td>Sample : GRN52712, lot no. 286, Mukim Jeram, District: Kuala Selangor title area: 424.0087 ha Total titles: 21 (3,014.5132 ha)</td> <td>Agriculture & not categorized/ gazetted</td> <td>Freehold</td> </tr> <tr> <td>Bukit Cheraka</td> <td>Sample : GRN288299, lot no. 2538, Mukim Jeram, District: Kuala Selangor title area: 273.7694 ha Total titles: 105</td> <td>Agriculture & not categorized/ gazetted</td> <td>Freehold</td> </tr> </tbody> </table>	Estate	Land title	Land use type	Tenure	Bukit Kerayong Estate	Sample : GRN52712, lot no. 286, Mukim Jeram, District: Kuala Selangor title area: 424.0087 ha Total titles: 21 (3,014.5132 ha)	Agriculture & not categorized/ gazetted	Freehold	Bukit Cheraka	Sample : GRN288299, lot no. 2538, Mukim Jeram, District: Kuala Selangor title area: 273.7694 ha Total titles: 105	Agriculture & not categorized/ gazetted	Freehold	
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			<p>Sample : GRN44485, lot no. 3603, Mukim Jeram, District: Kuala Selangor title area: 201.1284 ha Total titles: 28</p>		
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.		Complied	
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.		Complied	
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.		Complied	

4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
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 in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
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 -	There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
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 -	There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied

Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.

4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -</p>	<p>There were no issues of land disputes recorded. All land title was kept in the office and available for review as per clause 4.4.1.</p>	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -</p>	<p>There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -</p>	<p>There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -</p>	<p>There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.</p>	Complied
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,</p>	<p>There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with</p>	Complied

	environmental and social implications of the proposed operations on their lands. - Minor compliance -	the neighbouring villagers confirmed that no encroachment of land by the company.	
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 -	There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
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 -	There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no land dispute in SOU 7 Bukit Kerayong POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
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 -	There is no native and customary right land in SOU 7 (Bukit Kerayong POM Certification Unit). However, if there is any dispute, SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied

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4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	There is no native and customary right land in SOU 7 (Bukit Kerayong POM Certification Unit). Thus, this indicator is not applicable	Not Applicable
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	However, if there is any dispute, SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	There is no native and customary right land in SOU 7 (Bukit Kerayong POM Certification Unit). Thus, this indicator is not applicable	Not Applicable
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.7.3	<p>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.</p> <p>- Minor compliance -</p>	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Not Applicable

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 -	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Not Applicable
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 -	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Not Applicable
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 -	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Not Applicable
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 -	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Not Applicable
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>BKOM does not directly source FFB from smallholders. BKOM purchased outside FFB either from independent estates or collection centres. The FFB purchasing prices are stated in the FFB purchasing contract. The pricing is calculated following the MPOB price. Hence the publically available FFB pricing is not necessary.</p>	Not Applicable
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>BKOM does not directly source FFB from smallholders. BKOM purchased outside FFB either from independent estates or collection centres. The pricing mechanism is available in the FFB purchasing contract. Interview with collection centres owner confirmed they understood the pricing mechanism.</p>	Not Applicable
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 pricing is calculated based MPOB price guidance. As BKOM does not purchase FFB directly from smallholders, this fair pricing is not necessary to be provided to smallholders.</p>	Not Applicable
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>BKOM does not purchase FFB directly from smallholders. Hence this indicator is not necessary. However the pricing mechanism for purchasing FFB from independent estates or out growers or collection centre is available in the FFB purchasing contract.</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 FFB purchasing contracts with independent estates or out growers or collection centres are available. Sample of contract with Landta Rasmi Sdn Bhd dated 07/08/2020 was reviewed. The contract is legally binding to Malaysia regulations. However please refer to indicator 2.2.2.</p> <p>Interview with collection centres owner ensure that the contract are fair, legal and transparent. The payment are as per the agreed timeframe.</p>	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. - Critical (Major) compliance -</p>	<p>Interview with collection centres owner ensure that the contract are fair, legal and transparent. The payment are as per the agreed timeframe.</p>	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -</p>	<p><u>Bukit Kerayong Oil Mill</u> As sampled available Calibration Statement under Akta Timbang dan Sukat 1972. Regulation 16, 28A and 45, for Calibration Sticker No (DE18-000621), (2-I Q 011273) done by Den by De Metrology Sdn Bhd.) dated 13/10/20 for ATK-60 ton DE18-000621 (RM 2176) and ATK-6 Ton 2.1K Q011273)</p> <ul style="list-style-type: none"> • Service Report No. A-04267 dated 11/08/20 for One unit of electronic computerized truck Scale System. Capacity: 60,000kg + 10 kg differences Certificate No. B1726135 Sticker No. 2.1K-Q011273 • Service Report No. B-04267 dated 11/08/20 for One of unit electronics computerized Truck Scae system. Capacity 60,000Kg + 10 kg differences. 	Complied
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -</p>	<p><u>Bukit Kerayong Oil Mill</u> The FFB sent to Bukit Kerayong Oil Mill are supplied mainly from two own estates namely Bukit Kerayong Estate and Bukit Cheraka Estate. Sime Darby Plantation has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers. As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after</p>	Complied

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		2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting, transport and selling of FFB.	
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	There is no direct sourcing from smallholders. SOU 7 source external FFB from independent out growers and traders/collection centres. Although there is no direct smallholder sourcing SDP has developed the Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) and the Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.	Complied
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>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.</p> <p>- Minor compliance -</p>	There is no independent smallholders associated to SOU 7. SOU 7 is sourcing FFB from independent estates and traders/collection centres. Currently, SDP is implementing Responsible Sourcing Guidelines to improve the sourcing of legal FFB.	Complied
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	There is no independent smallholders associated to SOU 7. Despite there are no independent smallholders, SDP has developed and implement the Responsible Sourcing Guidelines to improve the sourcing of legal FFB. Hence SDP has indirectly supporting sustainable FFB production of the smallholders that are supplier to the traders or collection centres that SOU 7 sourced from.	Complied
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	Since 2016, Sime Darby has developed and implement the Responsible Sourcing Guidelines to promote legality FFB production of smallholders which the traders or collection centres source from.	Complied

		The work program developed by SDP is to evaluate 10 smallholders attached to the traders or collection centres annual.	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There is no independent smallholders associated to SOU 7.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There is no independent smallholders associated to SOU 7.	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 -	SDPSB has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02nd December 2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.	Complied
6.1.2	(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. - Critical (Major) compliance -	Migrant workers are recruited with (2 +1) and 3 years contract. Local workers are on a long-term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, subsidized water and electricity supplies, and medical care are given to all employees without discrimination. Foreign migrant workers. Refer to Letter of Employment, Employment Contract para" 14 – Annual leave: 14 days for < 5 years and 16 days for > 5 years.	Complied

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		Overtime paid as per Employment Act 1995 (EA). Sampled workers are as 6.5.1.	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	There is no any discrimination based on religion, gender, nationality etc., during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting. Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Pregnancy test conducted in Bukit Kerayong POM Certification Unit only for female sprayer to ensure that no pregnant woman is handling any chemicals. If the workers confirmed pregnant, Medical Assistant will issue a recommendation letter to Assistant Manager for work change to light work and not involved in any chemical. Confirmed through the interview session to workers, Medical Assistant and Gender Committee Minute of Meeting.	Complied
6.1.5	(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. - Critical (Major) compliance -	The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. SDPSB has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management. The meetings were conducted as per SOU7 complex as below: Bkt Kerayong POM, Bkt Cheraka Estate and Bkt Kerayong Estate: 7/2/20, 23/9/20 and 12/12/20	Complied

		Meeting was not promptly carried out due to COVID19.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	There is no any discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting. Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.	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	(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. - Critical (Major) compliance -	All the workers are under direct employment and some electrical works are under contractor workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract. Sighted the pay slip for employees (January [low], June [peak] and August [normal] 2020) as below: Bukit Kerayong POM: <ul style="list-style-type: none"> • Employee ID: 0000006767 • Employee ID: 0000006776 • Employee ID: 0000009838 • Employee ID: 0000097974 • Employee ID: 0000116255 • Employee ID: 0000125337 • Employee ID: 0000152602 • Employee ID: 0000159742 	Complied

		<p>Bukit Kerayong Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000029723 • Employee ID: 0000080802 • Employee ID: 0000132810 • Employee ID: 0000117381 • Employee ID: 0000101983 • Employee ID: 0000107977 • Employee ID: 0000072141 • Employee ID: 0000101983 • Employee ID: 0000154999 • Employee ID: 0000153159 <p>Bukit Cheraka Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000007453 • Employee ID: 0000030064 • Employee ID: 0000082998 • Employee ID: 0000099421 • Employee ID: 0000102331 • Employee ID: 0000102922 • Employee ID: 0000113296 • Employee ID: 0000117967 • Employee ID: 0000153751 • Employee ID: 0000153753 • Employee ID: 0000156895 • Employee ID: 0000157743 	
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<p>6.2.2</p>	<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>All workers have the employment contract stated the regular working hours (8 hours for daily rate) and piece rates by works as per Employment Act 1955.</p> <p>Sighted the employment contract for employee;</p> <p>Bukit Kerayong POM:</p> <ul style="list-style-type: none"> • Employee ID: 0000006767 • Employee ID: 0000006776 • Employee ID: 0000009838 • Employee ID: 0000097974 • Employee ID: 0000116255 • Employee ID: 0000125337 • Employee ID: 0000152602 • Employee ID: 0000159742 <p>Bukit Kerayong Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000029723 • Employee ID: 0000080802 • Employee ID: 0000132810 • Employee ID: 0000117381 • Employee ID: 0000101983 • Employee ID: 0000107977 • Employee ID: 0000072141 • Employee ID: 0000101983 • Employee ID: 0000154999 • Employee ID: 0000153159 	<p>Complied</p>
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		<p>Bukit Cheraka Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000007453 • Employee ID: 0000030064 • Employee ID: 0000082998 • Employee ID: 0000099421 • Employee ID: 0000102331 • Employee ID: 0000102922 • Employee ID: 0000113296 • Employee ID: 0000117967 • Employee ID: 0000153751 • Employee ID: 0000153753 • Employee ID: 0000156895 • Employee ID: 0000157743 <p>Overtime permit by Labour Department, ref: JTKS(E) 6/119.Jld III (03) dated 26/11/13 with the limit of 130 hours per month. The maximum overtime hours is 120 hours in the peak month March 2020.</p> <p>Permit for salary deduction was verified for;</p> <ol style="list-style-type: none"> i) Great Eastern & MCIS, ref: JTKS(E)6/115.Jld 61-12(2) dated 18th December 2019 ii) Electricity Deduction, ref: BHG.PU/9/129 JLD 38 (53) dated 6/7/17 (Sime Darby Plantation Berhad blanket approval) 	
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<p>6.2.3</p>	<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>The paid salary sighted for Bukit Kerayong POM Certification Unit for March, April and May 2020 were complied with the Minimum Wage Order 2019 (for all workers) and Minimum Wage Order 2020 (for workers in town, if applicable).</p> <p>Sighted the pay slip for employees as below:</p> <p>Bukit Kerayong POM:</p> <ul style="list-style-type: none"> • Employee ID: 0000006767 • Employee ID: 0000006776 • Employee ID: 0000009838 • Employee ID: 0000097974 • Employee ID: 0000116255 • Employee ID: 0000125337 • Employee ID: 0000152602 • Employee ID: 0000159742 <p>Bukit Kerayong Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000029723 • Employee ID: 0000080802 • Employee ID: 0000132810 • Employee ID: 0000117381 • Employee ID: 0000101983 • Employee ID: 0000107977 • Employee ID: 0000072141 • Employee ID: 0000101983 • Employee ID: 0000154999 	<p>Non-compliance</p>
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		<ul style="list-style-type: none"> • Employee ID: 0000153159 <p>Bukit Cheraka Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000007453 • Employee ID: 0000030064 • Employee ID: 0000082998 • Employee ID: 0000099421 • Employee ID: 0000102331 • Employee ID: 0000102922 • Employee ID: 0000113296 • Employee ID: 0000117967 • Employee ID: 0000153751 • Employee ID: 0000153753 • Employee ID: 0000156895 • Employee ID: 0000157743 							
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 basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity and water were supplied by government and deducted from salary.</p> <p>Seen the Budget for housing repairs, sanitation, garden upkeep and CAPEX & OPEX from all operating units.</p> <p>Seen the record for weekly line site inspection done by Medical Assistant (estate) and QA (mill) in fortnightly basis as per the new Workers Minimum Housing and Amenities Regulation 2020. Inspection records checked:</p> <table border="1" data-bbox="1137 1326 1930 1374"> <thead> <tr> <th data-bbox="1137 1326 1402 1374">Estate/Mill</th> <th data-bbox="1402 1326 1666 1374">Date of inspection</th> <th data-bbox="1666 1326 1930 1374">Remarks</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estate/Mill	Date of inspection	Remarks				Complied
Estate/Mill	Date of inspection	Remarks							

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		Bukit Kerayong POM	26/1/20 and 12/12/20	Old line site drain not flowing. On site verification: Clogged drain observed and cleaning is required.	
		Bukit Kerayong Estate	22/12/20 and 10/12/20	No comment reported.	
		Bukit Cheraka Estate	30/12/20 and 8/12/20	Stray dog and cattle issues at line site reported. On site verification: no stray dogs and cattle observed	
		For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes).			
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	There were sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient and affordable foods and goods. Price of goods were displayed at the sundry shops. Workers interview confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town. Nearest town are Kapar (5 km) and Klang (10 km)			Complied

<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p>	<p>Sime Darby Plantation Berhad – Bukit Kerayong POM & supply bases have provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. The payslip sighted in clause 6.2.1 showed that the salary received complied with the minimum wage order 2020 and the decent living wage set up by the group which is foreign worker is RM1528.14/worker and local RM1397.48/worker.</p>	<p>Complied</p>
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	<p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>There are no casual workers hired in Bukit Kerayong POM and supply bases. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full-time employment or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. 	Complied

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		<ul style="list-style-type: none"> Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. <p>Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p> <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</p>											
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Trade union meeting carried out at each respected operating unit were verified. The meeting involved the representative from employer and employee. Date of meetings summarized as per below:</p> <table border="1" data-bbox="1137 823 1928 1086"> <thead> <tr> <th>Estate/mill</th> <th>Date of meeting</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Bkt Kerayong POM</td> <td>29/12/20</td> <td rowspan="3">Annual official meeting</td> </tr> <tr> <td>Bukit Kerayong Estate</td> <td>17/12/20</td> </tr> <tr> <td>Bukit Cheraka Estate</td> <td></td> </tr> </tbody> </table> <p>Issues discussed as below:</p> <p>Bukt Kerayong Estate:</p> <ul style="list-style-type: none"> Road condition to Jalan Acob line site not in a good condition. <p>Bukit Kerayong POM:</p>	Estate/mill	Date of meeting	Remarks	Bkt Kerayong POM	29/12/20	Annual official meeting	Bukit Kerayong Estate	17/12/20	Bukit Cheraka Estate		Complied
Estate/mill	Date of meeting	Remarks											
Bkt Kerayong POM	29/12/20	Annual official meeting											
Bukit Kerayong Estate	17/12/20												
Bukit Cheraka Estate													

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		<ul style="list-style-type: none"> Workers repatriation issues during COVID19 Official public holiday @ paid leave for 2021 	
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>Based on the worker’s interview, the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation and appointment letter sighted. The selection also based on the election meeting.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities. Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed 	Complied

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		<p>Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use.</p> <ul style="list-style-type: none"> • Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. • Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography. <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.</p>	
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>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liason & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There is no young worker employed in Bukit Kerayong POM certification unit.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p>	<p>The unit of certification has communicated the Human Right Charter, Social Policy and Vendor COBC through the stakeholder meeting and muster briefing.</p>	Complied

	- Minor compliance -		
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> • Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. • Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. <p>The policy was communicated through the Gender Committee meeting.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>SDPSB has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>In Bukit Cheraka Estate, the assessment for new needs for new mother was conducted by Gender Committee chairman and chief clerk. There were new needs as sampled below:</p>	Complied

		Assistant manager: no request for far as the baby is taken care by caretaker. Breastfeeding only during night and most of the time using infant formula milk.	
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	Gender committee has been formed in each unit for the medium of sexual harassment grievances by female.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>The recruitment cost was declared by the labour agent from source country for the applicable fees. Sampled for PT Cahaya Lombok for Indonesia effective date on 22/04/2019 (RM 1,505.00) and Wajanikko Holding Sdn Bhd for India (RM1870 – from Kolkata, RM1670 – from Chennai) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.</p> <p>Passport was kept by the management voluntarily. There is agreement letter signed by worker and employer on the safekeeping passport at office. If the workers want to obtain the passport for own usage, they can anytime request for it.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p> <p>Based on the workers interview, the overtime was given voluntarily if any work offered. The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> 1. The company is not satisfied with your performance 	Complied

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		<p>2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term.</p> <p>3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime.</p> <p>4. You have breached any express or implied terms of your employment.</p> <p>Fail medical examination based on FOMEMA result.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPSB has implemented a Sime Darby's Human Rights Charter on where they committed as below:</p> <p>a. Providing equal opportunity</p> <p>b. Respecting freedom of association</p> <p>c. Eradicating any form of exploitation</p> <p>d. Ensuring favorable working conditions</p> <p>e. Enhancing Safety and Health</p> <p>For 2020, there was no new recruitment of foreign workers in Bukit Kerayong POM management unit.</p>	Complied
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><u>Bukit Kerayong Oil Mill</u></p> <p>Sighted clear appointment of Safety and health Committee Chairman (Mill Manager) dated 02/01/19 appointed by Regional General Manager (Adrianudin Raj Azman.) and appointment of committee members as appointment letter dated 02/01/20 appointed by Mill Manager.</p>	Complied

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		<p>Safety and health Committee meeting was conducted for Oil Mill as sighted from Minutes of Meeting date conducted 19/06/20 (Bil 45/2020-1) attended by Senthilkumaran (Mill Manager), Mof Hafiz (Asst), Employer Representatives (6) and Employees Repepresentatives (11). SHO (Mohd Shuib b. Mohd Yusof), 28/09/20 (Bil 48/2020-3), 12/12/20 (Bil 49/2020-4). Sighted similar attendance and items discussed and decision made.</p> <p><u>Bukit Kerayong Estate</u> Meeting was conducted on 27/01/20 and 05/10/20 attended by 15 Employer Representatives and 5 Employees Representatives. Sampled both minutes found similar wording under Workplace inspection. The secretary should enhance minutes reporting and avoid future replication or wording as sighted under Item No. 07 <i>Laporan Latihan, Lawatan dan Pemeriksaan Audit</i> and under Item 08 <i>Pemeriksaan Tempat Kerja stated Kawasan perumahan perlu dijaga kebersihan dan alatan kerja perlu diletakkan di tempat yang disediakan bersebelahan klinik main division.</i> Action by Veeran (clerk) date 05/11/20 and status in progress.</p> <p><u>Bukit Cheraka Estate</u> Sighted four minutes of meeting of Safety and Health Committee as verified with the relevant documents. 09/12/2020, 02/09/2020, 01/07/2020, 10/01/2020.</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid</p>	<p>Accident and Emergency Procedure SDP/13/01/08 dated 20/08/08. Covering Crisis management and Emergency Response Plan. The estates maintain the records of accident cases and reported to HQ using the Rapid 4 System. Available Covid-19 Preparedness and</p>	<p>Non-compliance</p>

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	<p>equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Emergency Response Plan (SD/SGP/GSQM(OSH)/204-OD 8) dated 09/03/20 Rev.).</p> <p><u>Bukit Kerayong Oil Mill</u></p> <p>First aider present at various work station at the mill with appointed responsible person. Latest training was conducted on 29-30/09/2020. Noted during site visit and interview with workers noted that workers aware regarding the location of the nearest first aid kit from their work station. Sighted the first aid monitoring records and first aid items used records FY 2020.</p> <p>The estates monitor the usage and balance of the first aid kit. Sighted the monitoring records dated 20/1/2020 and 31/12/2020</p> <p><u>Bukit Kerayong Estate</u></p> <p>2 trained first aiders and appointed at letter dated 04/01/21:</p> <ol style="list-style-type: none"> 1. Abdul Aziz Ibrahim (Asst Manager) 2. Intan Nabila Abd Khalid (MA) <ul style="list-style-type: none"> • Sampled 2 mandores (Sprayer and Harvester) both having first aid box and verified at site. MA is responsible to manage the distribution and replenishment of all first aid boxes. 8 store clerk, mandore, foreman, field officer. <p><u>Bukit Cheraka Estate</u></p> <ul style="list-style-type: none"> • 8 store clerk, mandore, foreman, field officer has been trained as first aider. <p>Sample sprayer mandore (Siva) at field 20B (Cloh Division) found keeping a first aid box with him.</p>	
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		<p>Found in first aid box 6 at Mill’s workshop includes items that are expired. Dettol Antiseptic cream expired on 01/01/2021, Alcohol Swab expired in May 2018. Also items are not available i.e. Eye drop and latex glove.</p> <p>Previous minor was not effectively closed and upgraded to major NC.</p>	
<p>6.7.3</p>	<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><u>Bukit Kerayong Oil Mill</u></p> <p>Observed more than five workers not wearing PPE (Ear Plug/muff) at high noise area (Operation area such as engine room/boiler, sterilizer and etc) as required under newly revised Occupational Safety and Health (Noise Exposure) Regulation 2019. Available PPE Matrix 2020 covering hand, face, body, head, foot, ear, respirator for all category of process.</p> <p><u>Bukit Kerayong Estate and Bukit Cheraka Estate</u></p> <p>Plantation Sustainability and Quality Management (PSQM) Operational Control Procedure (SD/SDP/PSQM9EHS)/201-OS16 dated 26/02/15 at page 20 available Appendix 1: Recommended PPE For operating unit.</p> <p>Handling Hazardous Chemicals: Gloves, Goggle/Safety Glass, Mask/Respirator, Apron, Reflective jacket, Hat/Safety Helmet, Safety Boots.</p> <p>During Site visit, sighted sprayers Bukit Kerayong Estate at Field 02A during interview session conducted (7 of them) not wearing any safety glasses/googles as required. They claimed received the PPE but not using it as the mist from the spray will not reach their eyes. Sighted other PPEs such as safety boots, apron, cartridge respirator, gloves used by them for protection.</p>	<p>Non-compliance</p>

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		<p>Washing and bathing room provided for sprayers in both estates as sighted and located close to chemical mixing area and chemical stores.</p> <p>The below non-compliances were observed;</p> <ul style="list-style-type: none"> • More than 5 workers sighted at various high noise areas in Bukit Kerayong Oil Mill. • Substitute worker at loading bay and lorry driver not wearing safety boots. • 7 Sampled sprayers at Bukit Kerayong Estate not wearing safety glass/goggles provided to them. <p>Thus, a major NC was raised.</p>	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p><u>Bukit Kerayong Oil Mill</u></p> <p>All workers in the mill are entitled for medical care as the estate workers obtain medical care from the Government Clinic in Kapar or Hospital. In the event of major injuries or accidents, the workers will be given appropriate medical care at the hospital under the expenses of the management.</p> <p>Sampled Workers (Kavitha SOCSO B3400001852), Letchumy (B3400001852P) and foreign workers Nurman Darsah (B3400001852P), Kusnadi (B3400001852P) contribution to SOCSO as evidence from Payslip for November 2020.</p> <p><u>Bukit Kerayong Estate and Bukit Cheraka Estate</u></p> <p>Interview with group of sprayers and harvesters found medical expenses covered by the estate when been sent to external clinic or hospitals for treatment. Both Estate have their own clinic and</p>	Complied

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		employed a Medical Assistants to operate and treat any illness and arrangement for reference to nearest hospitals if needed.	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p><u>Bukit Kerayong Oil Mill</u> Records of all accident were kept and updated on a monthly basis. JKKP 6 (SL/SKEM/20/04555) was issued to DOSH date reported 26/10/20 for accident occurred on 18/10/20 involving Mohd Afif b. Haidzir Sham (Boiler Operator) at Boiler platform. 7 days MC (18/10/20-26/10/20). JKKP 8 Form was sent to DOSH dated 02/01/20 reported by Mohamad Iszat b. Mohamed Isa.</p> <p><u>Bukit Kerayong Estate</u> Motorcycle accident involving security (Muhammad Yazan b. Abd Kadir) on 23/12/20. 6 days MC. Travelling on motorcycle while patrolling. Tractor driver (Mathan) attacked by hornet at Jalan Akob Division on 07/09/20. 2 Days MC. Form JKKP 8 was sent to JKKP on 31/01/20 by Mohd Muzafar Omar Basiron (Manager).</p> <p><u>Bukit Cheraka Estate</u> Mohan A/L Veeramalay (Gen Worker) accident on 13/11/20 motorcycle accident while monitoring workers at filed. MC (16 days). Gobikhrishnan (Field Conductor) accident on 24/09/20 motorcycle accident due to slippery road at field 13E at 10.00am. MC (15 days). Kavidha A/P Subramaniam (Gen worker) Accident on 11/08/20 while slasing/poisoning woodies at field 06A. MC (13 days). Tamang Palsang (Nepalese Gen. Worker). Accident on 10/08/20 while cutting Fond at Field 06A. Cutter slip and fall on his leg. MC 2 days).</p>	Complied

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		<p>Usha A/P Muniyandy (Gen Worker). Accident on 02/03/20 travelling on motorcycle and lost control. MC (11 days)</p> <p>Vanisree A/P Subramaniam (Gen. worker) accident on 28/02/20 while travelling on motorcycle at Field 13C and lost control.</p> <p>Suhir (Indonesian Gen Worker) Accident on 09/02/20 while harvesting, cutter fall on his left hand. MC (7days)</p> <p>Form JKPP 8 for statistic of incidents in 2019 was sent to DOSH as sighted dated 05/01/21</p>	
<p>Principle 7: Protect, conserve and enhance ecosystems and the environment</p>			
<p>Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p><u>Bukit Kerayong Estate and Bukit Cheraka Estate</u></p> <p>Available a training record for IPM Leaf Pest in Oil Palm Plantation conducted for SOU 06 & 07 dated 29/09/20 trained by PNP CER. The estates have implemented a yearly IPM plan with the objectives as below :</p> <ul style="list-style-type: none"> • Beneficial establishment to increase the population of natural enemies in order to reduce the chemical usage. • To increase the Tyto Alba population so that estate can reduce the usage of rat baits. • To increase the population of Barn Owl. → Encouragement of biocontrol by use of beneficial plants. <p>Bukit Cheraka Estate has established Management Plan for IPM Implementation FY 2021.</p> <ul style="list-style-type: none"> • Intensive planting of beneficial plants in immature area: Frequency (2 round/year), Target (31/10/21), PIC (Sr. Asst, Field Sup.), Remarks (2 weeks after planting for replanting area) 	<p>Complied</p>

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		<ul style="list-style-type: none"> Intensive planting of beneficial plant area prone to bagworm attack: Frequency (@ round/year), Target (17/06/21), PIC (Sr. Asst, Field Sup.), Remarks (Field 2009A, 2005, 2007, 2010C) IPM Bagworm refreshment training: Frequency (1 round/year), Target (16/08/21), PIC (R&D-Plant Protection), Remark (completed). Fixing Ban owl box achieve target ration 1:10Ha: Target (18/06/21), PIC (Sr. Asst, Field Sup.), Remark (Current ration 1:20Ha) <p>Intensive planting of Euphorbia Heterophylla at Nursery sand old clinic Jeram Area for seed collection to plant in the field: Frequency (3 phase/year), Target (31/12/21), PIC (Sr. Asst. Field Asst,Field Supervisor), Remark (seed collection start on 2 months old and replant at the end of the 3 month.</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><u>Bukit Kerayong Estate and Bukit Cheraka Estate.</u></p> <p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas.</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>	Not applicable as not practiced.	Not Applicable
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has established an Agricultural Reference Manual for Oil Palm Planting, the recommended herbicide and the dosage for selective weeding, circle and path spraying. Among the herbicide recommended are as below:</p>	Complied

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		<table border="1"> <tr> <th>Noxious Weeds</th> <th>Herbicide (amount/ha)</th> <th>Rate</th> <th>Dilution rate</th> </tr> <tr> <td>Ischaemum muticum</td> <td>Glyphosate</td> <td>4L</td> <td>90 ml</td> </tr> <tr> <td>Impreta cylindrica</td> <td>Glyphosate</td> <td>6L</td> <td>135 ml</td> </tr> <tr> <td>Mikania micrantha</td> <td>Fluroxypyr</td> <td>0.375</td> <td>L 9 ml</td> </tr> <tr> <td>Stenochlaena palustris</td> <td>Sodium Chlorate + Metsulfuron - methyl</td> <td>5.5 kg + 75 g</td> <td>125 g + 1.5 g</td> </tr> </table>	Noxious Weeds	Herbicide (amount/ha)	Rate	Dilution rate	Ischaemum muticum	Glyphosate	4L	90 ml	Impreta cylindrica	Glyphosate	6L	135 ml	Mikania micrantha	Fluroxypyr	0.375	L 9 ml	Stenochlaena palustris	Sodium Chlorate + Metsulfuron - methyl	5.5 kg + 75 g	125 g + 1.5 g		
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7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -</p>	<p>Bukit Cheraka Estate available Chemical Used FY 2020 as sighted:</p> <table border="1"> <thead> <tr> <th>Chemicals</th> <th>Rate/Ha</th> <th>Usage</th> <th>LD50</th> <th>Field</th> </tr> </thead> <tbody> <tr> <td>Tarang (Glufosinate Ammonium) AI (24.32%)</td> <td>1.83L/Ha</td> <td>Immature Circle Spray</td> <td>Oral-5000mg/kg Dermal-2000mg/kg Inhalation->3.133mg/L</td> <td>2018, 2019, 2020</td> </tr> <tr> <td>Envo Cyper (Cypermethrine) AI (50%)</td> <td></td> <td>Immature P&D Spray</td> <td>Oral—0.035ug/L</td> <td>2018, 2019, 2020</td> </tr> <tr> <td>Canyon (Metsulfuron-metyl) AI (20%)</td> <td>75g/Ha</td> <td>Mature Circle Spray</td> <td>Mallard Duck>10000mg/kg >25ug/bee</td> <td>1997, 1998, 2000, 2001-2007, 2009, 2010,</td> </tr> </tbody> </table>	Chemicals	Rate/Ha	Usage	LD50	Field	Tarang (Glufosinate Ammonium) AI (24.32%)	1.83L/Ha	Immature Circle Spray	Oral-5000mg/kg Dermal-2000mg/kg Inhalation->3.133mg/L	2018, 2019, 2020	Envo Cyper (Cypermethrine) AI (50%)		Immature P&D Spray	Oral—0.035ug/L	2018, 2019, 2020	Canyon (Metsulfuron-metyl) AI (20%)	75g/Ha	Mature Circle Spray	Mallard Duck>10000mg/kg >25ug/bee	1997, 1998, 2000, 2001-2007, 2009, 2010,	Complied	
Chemicals	Rate/Ha	Usage	LD50	Field																				
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Envo Cyper (Cypermethrine) AI (50%)		Immature P&D Spray	Oral—0.035ug/L	2018, 2019, 2020																				
Canyon (Metsulfuron-metyl) AI (20%)	75g/Ha	Mature Circle Spray	Mallard Duck>10000mg/kg >25ug/bee	1997, 1998, 2000, 2001-2007, 2009, 2010,																				

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					2012-2017	
		Sodium Chloride AI (99%)	55kg/Ha	Selective Spray	Oral-5000mg/kg Dermal-2000mg/kg	1997, 1998, 2000, 2001-2007, 2009, 2010, 2012-2017
		Supremo (Glyphosate) AI (41%)	1.5L/Ha	Mature Circle Spray	Rat->5000mg/kg	1997, 1998, 2000, 2001-2007, 2009, 2010, 2012-2017
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 estates has implemented a Continuous Improvement Plan FY 2019/2020 where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan Sighted during the site visit the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at intended areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.</p>				Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p><u>Bukit Kerayong Estate</u></p> <p>Only Organophosphate chemical named Acephate under class III for bagworm infestation.</p> <p>Available a permit from Pesticide Board (Department of Agriculture) No. SEL/2018/ACP/0035(GL) for 200 kgs of Acephate from Hextar Chemicals. Approved 12/06/18. Approval from 12/06/18-02/07/18. Available SDS for Acephate date reviewed 15/03/18 from Hextar Chemicals Sdn Bhd.</p> <p><u>Bukit Cheraka Estate</u></p>				Complied

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		Available a permit from Pesticide Board (Department of Agriculture) No. SEL/2020/ACP/0017(GL) for 500 kgs of Acephate from Hextar Chemicals. Approved 28/12/20. Approval from 28/12/20-17/01/21.	
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>Paraquat was eliminated in both estates. As sighted in Chemicals Store found a proper communication and Classification of Chemicals (Ia, Ib, II, III, IV). Found only Supremo/ Ally fall under Class IV being used and kept. No Class IA and IB kept and used.</p>	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Sampled in Training Matrix 2020 SOU 07 Bukit Kerayong Estate, Chemical Spraying and SOP required for sprayers, store clerk, mandore). Sampled record of 2 hours training and briefing for sprayers conducted on 21/08/20 by Mr. Heng (Mycrop).</p> <p><u>Bukit Cheraka Estate</u></p> <p>Available Guideline for Safe Use of Chemicals (BCE/SOP-02) under Para 6 Spraying Activity mentioned Sign board (Awat Kawasan Sedang Diracun) required to be posted during spraying activity.</p>	Complied

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<p>7.2.7</p>	<p>(C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -</p>	<p>Observed storage of pesticides in both estates in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations.</p> <p><u>Bukit Kerayong Estate</u></p> <p>Sampled at Chemical Store in Bukit Kerayong Estate, found adequate labelling and signage posted. Spill kit available and sufficient quantity provided. SDS displayed and containment available to prevent spillages. Emergency shower and eye wash put on standby and located closely as observed.</p> <p><u>Bukit Cheraka Estate</u></p> <p>Sighted the chemicals or pesticides store were locked, signage and hazardous pictogram posted clearly. Classification of pesticides also posted at the entrance. Spill kit, emergency shower and eye wash facility available for emergency purpose.</p>	<p>Complied</p>
<p>7.2.8</p>	<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><u>Bukit Kerayong Estate and Bukit Cheraka Estate</u></p> <p>Procedure for Scheduled Waste Management was established (SD/SDP/PSQM (ESH)/203-EN1 dated 26/2/2016. Proper disposal of waste material were carried out as per procedures.</p> <p>Both estates visited also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estates visited.</p> <p>Empty pesticides container were identified as recycle waste. All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors, SS Setia Technology Enterprise. Refer approval letter from DOE no AS (B) J 91/110/619/069 Jld 3(37) dated 24/10/2018. Sighted the</p>	<p>Complied</p>

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		<p>implementation of the triple rinse during site visit at the storage area.</p> <p>Sighted the disposal records of empty pesticides pesticides container dated 23/11/2019 and 15/6/2020.</p>	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>The Bukit Kerayong Estates and Bukit Cheraka Estate do not conduct aerial spraying.</p> <p>Sampled during site visit at Block 02A at Main Division in Bukit Kerayong Estate and interview conducted with sprayers (Ramlal Pal, Anamol Haq, Ajyar and 4 others) found understanding on prohibition of area spraying and demonstrated as observed.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p><u>Bkt Kerayong Estate</u></p> <p>Sampled medical surveillance conducted by Dr. Kamalakaran (HQ/08/DOC/00/329) done November 2019 done for 2 workers (Foreman-Balakrishnan A/L Murugiah), Workshop-Premanandana A/L Maniam(Workshop) both status OK. Normal.</p> <p>February 2020 done to 5 workers Ravi A/L Uthandi (Driver), Kumar A/L Monyraju (Foreman), Pahrudin (AU495550)-Sprayer, Mohd Ridwan (AU495551)-Sprayer, Enah Lalu Irwan (AU357890)-Sprayer) OK. Normal.</p> <p>December 2020 done on 17 drivers. Sah Laxami, Ramlal Pal (U0561865), Kanesan (731114105193) Mandore, Lalitha A/P Nadesan (830101106166) Mandore, Laltu Sarkar (588768390, Biswaji Sikdar (N7866372), Narayanan Sardar (N68830300, Enamul Haq (R1093307), Ratan SK (N0893890), Mahato Bhasha (M1188603), Sukumas Das (N3114136), Ahir Hardikkumar Dhirubhai (P0999225), Mondal AJgal (N6620862), Kirman (AT996123), Mahasin Mondal (T4346629), Abdul Tolah Hak (1036546), Kadar Sekit (R5491582), All OK. Normal</p>	Complied

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		<p>Found 3 workers Tractor Driver-Jamarul Haque (OK Sent as per invoice dated 31/12/20 from Klinik Kapar included Batumalai A/L Vyapuri and Balakrishnan A/L Mrugiah).</p> <p><u>Bukit Cheraka Estate</u> Sighted Medical Surveillance Summary Report 2020 for Sime Darby Plantation (Bukit Cheraka Estate) prepared by Mohamad Naqib Shariff. CHRA Report recommended 52 workers exposed to organophosphate and welding fume to undergo medical surveillance programme. As conclusion all workers have no significant exposure to pesticides and welding fume.</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>Bukit Kerayong Estate, all sprayers are male and nor underaged except 2 upkept mandores (Lalitha and Saroh A/P Thanggavello), both age above 35 years old and not pregnant or breastfeed babies.</p> <p>_All sprayers are man as verified and sighted during site visit in Cloh Division. The same team will be operating for other division in spraying activity.</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>The mill has established waste management plan base on the waste identified and documented in Types of Waste Products and Method of</p>	<p>The waste management plan of Bukit Cheraka was audited. The plan is incorporated in the Environmental Management Plan, period 2020/2021. The plan includes disposal scheduled waste and recycle waste.</p> <p>Scheduled waste is disposed through the licensed waste disposal or through Sime Darby Industries (SDI). SDI is contracted to perform vehicle maintenance and upon completing the maintenance, the</p>	Choose an item.

	<p>Disposal, Action Plan to Reduce Waste. Sighted the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> i. Dedicated workers were assigned to segregate the recyclable items and dispatch to waste managers. Sighted the waste disposal records as at May 2019 amounted RM 4422.00 ii. EFB recycle and applied in the estate field as mulch. Sighted the records of EFB disposal FY 2018 at 49393 ton for 593 ha. 	<p>wastes are being collected. The DOE approval for such activity by SDI was sighted.</p> <p>The pesticide containers that are triple rinsed are recycle through SS Setia. Approval from the authority to allow SS Setia to collect and recycle the pesticide containers was sighted.</p> <p>Records of disposal are maintained.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Visit to housing compound and fields shows the disposals of waste are satisfactory. However refer to indicator 3.3.2 regarding disposal of scheduled waste in mill.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>There is no open fire waste disposal observed at the housing area. Interview with workers confirmed that waste at linesite are collected by estate managements. At Bukit Cheraka estate Main division, the wastes are collected on Monday, Wednesday, Friday and Sunday while Bukit Cloh and Braunston division are collected on Tuesday and Thursday. The waste are being disposed by external collector. There are no landfills within SOU 7.</p>	Complied
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>SOP was established SOP, dated 2/1/2008 and Agricultural Reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU 7 as a guidance document to conduct estate operation. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>A good agriculture practices which follows the Group Agriculture Manual (SDP/OP/ARM/10) contains Standard Operating Procedures</p>	Complied

		to ensure soil fertility is managed to a level that ensures optimal and sustained yield.	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Internal Agronomist from Plant Nutrition & Protection, Central East Region will visit Bukit Kerayong Estate and Bukit Cheraka Estate annually and inspected the oil palm planting to determine the plant health through leaf sampling. The motive of the inspection is to formulate the following year manuring programme. The leaf sampling is done on a yearly basis to continuously monitor the health of the palms and the summary of leaf nutrient status report is provided to the estate.</p> <p>The soil sampling is done every 5 years to monitor changes in the soil fertility. The sampling was last done on 25/09/18 by Sime Darby Research Sdn Bhd. Test report No S68/2018 in B.ukit Cheraka Estate.</p> <p>Sighted Bukit Cheraka Estate 2020 Agronomic and Fertilizer Recommendation Report by Shamsol Nidzam Abdul Rashid consist of Palm Nutritional Status/Observation, 2019 Manuring Application Status, Fertiliser Analysis & Field Observation and Agronomic Matters.</p> <p>For 2021 report made by Kumaran Rajagopal & Nor Sarashimatun (Agronomist) Annual visit conducted 04-05/11/20.</p>	Complied
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 is sent to the both Bukit Kerayong Estate and Bukit Cheraka Estate for mulching purposes. Weighbridge records are kept for monitoring purposes in the mill.</p> <p>POME Farrow irrigation is done at the Bukit Kerayong Estate and monitored by the Bukit Kerayong Oil Mill. EFB were disposed at sister estate through land application/mulching. Sighted the EFB disposal records as follows:</p>	Complied

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Month	Ton
Jan	1496.25
Feb	2399.59
Mar	2762.49
Apr	2464.24
May	2492.92
Jun	2782.99
Jul	2332.93
Aug	2120.42
Sep	2213.25
Oct	2477.06
Nov	2111.47
Dec	1848.05

Bukit Kerayong Estate and Bukit Cheraka Estate obtains the EFB from the mill to be used as a Mulch in the estate to further fertilize the soil.

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		It was sighted in the estate the EFB application in the field 20B in Cloh Division under Bukit Cheraka Estate and Field 02A Main Division in Bukit Kerayong Estate obtains the EFB from Bukit Kerayong Oil Mill to be used as a Mulch in the estate to further fertilize the soil.	
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p><u>Bukit Kerayong Estate and Bukit Cheraka Estate</u></p> <p>The process of the fertilizer application commences from an agronomist visit for a leaf and soil sampling to determine the level of nutrient and fertility. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient and fertility at the desired level. The agronomist will develop a yearly recommendation of fertilizer based on the data collected. Estate will use this fertiliser recommendation for the entire requirement in the field identified. Fertilizers are then applied based on the programme generated and records are maintained.</p> <p>Fertilizer Application Records were sighted in both Bukit Kerayong Estate and Bukit Cheraka Estate a were monitored and updated as and when the application is done.</p>	Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance –	Soil surveys are done and available as analysis conducted (Chief Chemist II) in Inter Office Mail dated 25/09/18. in a soil map at both estates. The soil series map prepared accordingly. There are no peat soils or soil categorized as marginal or fragile soil at both estates	Complied
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.	Sime Darby Plantation has established a procedure for planting on slopes, documented in Agricultural Reference Manual ver. 1 Section 4 issued on 1/7/2018. Quoted from the Agricultural Reference Manual titled Construction of Terraces, Item no. 8.4 (Areas with	Complied

	- Minor compliance -	greater than 25° slopes should not be planted and best left for biodiversity purposes but access road between the planted areas through unplanted biodiversity area has to be constructed and maintained. There was no planting on slopes in Bukit Kerayong Estate and Bukit Cheraka Estate (declared as HCV Area Field P04B)	
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	Certification Unit and supply base did not carry out any new plantings on steep terrains.	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 -	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	<u>Bukit Cheraka Estate</u> Soil surveys are done and available as analysis conducted by (Chief Chemist II) in Inter Office Mail dated 25/09/18. in a soil map at both estates. Soil analysis test report included (No.S68/2018) Identifying the pH, Org C, Total Nitrogen, Total P, Avail P, Total exchangeable Bases (Sodium, Pottasium, Calcium, Magnesium) and Organic Carbon. Topographic contour (water movement) map for Bukit Cloh Estate, Braunston Division are also available which are both used to manage the drainage and road works in the estates.	Complied

Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	Certification Unit and supply base did not carry out any new plantings since November 2005. Not applicable as no new planting in Bukit Kerayong Estate and Bukit Cheraka Estate.	Not Applicable
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Not Applicable
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the Sime Darby Agricultural Reference Manual (Water Management in Coastal and Peatlands) issued on 01.07.2011.</p> <p>Sighted Water Management Plan for Bukit Kerayong Estate and Bukit Cheraka Estate FY2020. Objectives:</p> <ul style="list-style-type: none"> • Monitor quality of main water inlet/outlet for pollutants from estate’s operation. • Contingency during water shortage. • Monitor the usage of fresh water in monthly basis. • Reuse/recycle wastewater. 	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting.</p>	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Not Applicable

	<p>The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</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>	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	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>	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	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>Water Management Plan for Bukit Kerayong Estate FY2020.</p> <p>Objectives:</p> <ul style="list-style-type: none"> • Monitor quality of main water inlet/outlet for pollutants from estate's operation. 	Complied

	<p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance –</p>	<ul style="list-style-type: none"> • Contingency during water shortage. • Monitor the usage of fresh water in monthly basis. • Reuse/recycle wastewater. <p>The vegetations were well maintained and no sign of chemical application along the buffer zone. Both estates visited provided the clean and treated water to their workers by own water treatment plant and from Syarikat Bekalan Air Selangor.</p>																			
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>The Estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table border="1" data-bbox="1189 986 1816 1185"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table>	No	River width	Buffer zone	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	Complied
No	River width	Buffer zone																			
1	> 40 meters	50 meters																			
2	20 - 40 meters	40 meters																			
3	10 - 20 meters	20 meters																			
4	5 - 10 meters	10 meters																			
5	< 5 meters	5 meters																			
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 final discharge of mill effluent is land application as per the Department of Environment license. The allowable threshold of the BOD prior discharge is 5,000mg/l. As per the DOE requirement and SDP Mill Quality Management System (SOP for Effluent Treatment Plant version 1; year 2008) the mill conduct effluent discharge</p>	Complied																		

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		<p>analysis once a month. The mill had complied with the DOE requirement to submit the results to DOE on quarterly basis.</p> <p>The effluent analysis are conducted by Sime Darby Research and ISO17025 accredited laboratory. Analysis results verified to be less than 1,000mg/l.</p> <p>As according to the DOE license, the effluent Performance Monitoring is being monitored and recorded in effluent treatment metering book.</p>	
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Water consumed has been continuously monitored. For FY2020, the water consumed was 2.07 metric ton water per ton of FFB. As compare to FY2019, the water consume was 2.72 metric ton water per ton of FFB. Water consumption per ton of FFB mainly due to savings for low crop production.</p>	Complied
<p>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>			
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>For FY2020, the fossil fuel used per ton of FFB is 0.20 while as compare to FY2019, it was 0.30 per ton of FFB. There is a reduction of fossil fuel consumption per ton of FFB mainly due to savings for low crop production.</p> <p>The mill uses combination of grid electricity and biomass for electricity demand within the mill's operation. The usage of grid electricity is being monitored. The FY2020 grid electricity consumption was 7.54kWh per ton of FFB.</p> <p>The mill has implemented project to reduce electricity consumptions by improving the efficiency of the boiler. The savings and improvement has shown by reduction in electricity bill.</p> <p>At Bukit Cherkah Estate, plan for fossil fuel usage efficiency is documented in Environmental Management Plan – Energy Management. One of the plan is to educate workers on fuel savings</p>	Complied

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		practices. Drivers' training conducted on 11-12 September 2019 was sighted.	
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>SOU7 Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <p>a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment.</p> <p>b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.</p> <p>c) SOU 7 has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. Below is the summary of result:</p>	Complied
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>	<p>At Bukit Kerayong Estate, there was land conversion of abandon housing to oil palm. The major potential GHG associated with this conversion was evaluated and reported in Carbon Stock Assessment and Projection of Major GHG Emission for New Planting (SOU 7 Bukit Kerayong – conversion of Ex-workers Housing Complex to Oil Palm) in January 2019.</p> <p>The total net GHG emission resulted from this conversion is 4 tCO₂e. The GHG was determined using the RSPO GHG Assessment Procedure for New Development version 3 October 2016.</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p>	<p>Significant pollutant at the mill include boiler pollution. As per the DOE license, the mill is required to monitor particle and Carbon</p>	Complied

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	- Critical (Major) compliance -	<p>Monoxide emissions. The threshold levels are 150mg/m³ and 1,000mg/m³ respectively. BKOM has installed a new boiler in Jan 2020 and the boiler is still under commission. The Continuous Emission Monitoring System is not yet available but the mill has submitted the application to the DOE on 30/09/2020.</p> <p>Pollution identified at Bukit Cheraka Estate includes smoke from vehicle and leakage of lubricant fluids. Management plans includes preventive maintenance of the vehicle. Maintenance records are maintained.</p> <p>Other significant pollutants includes erosion due to replanting and the control measures is to plant Legume Cover Crop (LCC). The planting of LCC was observed at the replanting fields.</p>	
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.</p> <p>- Critical (Major) compliance -</p>	<p>Land preparation for replanting follows the felling and chipping methods. Site observation and interview with local communities confirmed that no fire was used for land preparation.</p> <p>The land conversion of abandon housing to oil palm did not use any form of burning. There is no logic to burn down building for the conversion.</p>	Complied
7.11.2	<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>The fire prevention and control measures is established in SDP group level and Operating Unit level. For Group level, Zero Burning Policy has been established and monitoring of Hotspot using the PLATINUM platform. The monitoring was established since November 2013.</p> <p>At Bukit Cheraka Estate, Emergency Response Team is formed to coordinate any emergency due to fire.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p>	<p>The fire prevention policy was shared during the stakeholder meeting in November 2019.</p>	Complied

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	- Minor compliance -	Fire prevention activities within Bukit Cherekah Estate include workers awareness. The waste management plan documented that no burning of waste.																								
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>	<p>There is no land clearing that damaged primary forest or any area required to protect or enhance HCV observed since November 2005 in SOU 7.</p> <p>There was a land conversion of 1.64ha from abandoned workers housing area to oil palm which is within a certified area at Bukit Kerayong Estate. An SEIA was conducted and reported in Dec 2018 internally for this conversion purposed.</p> <p>Prior the conversion, Carbon Stock Assessment and Projection of Major GHG Emission was conducted in January 2019 internally by GSQM Department. The carbon stock assessment was conducted following the Carbon Assessment Toll for New Oil Palm Plantings June 2014. The carbon stock value (CSV) assessed are as below:</p> <p>CSV before conversion</p> <table border="1" data-bbox="1137 1010 1928 1243"> <thead> <tr> <th>Field</th> <th>Category</th> <th>Land area</th> <th>CSV</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Abandon housing complex</td> <td>Bare soil / building</td> <td>1.16</td> <td>0</td> </tr> <tr> <td>Grass land</td> <td>0.48</td> <td>2.4</td> </tr> <tr> <td>Total</td> <td></td> <td>1.64</td> <td>2.4</td> </tr> </tbody> </table> <p>CSV after conversion.</p> <table border="1" data-bbox="1137 1332 1928 1380"> <thead> <tr> <th>Field</th> <th>Category</th> <th>Land area</th> <th>CSV</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Field	Category	Land area	CSV	Abandon housing complex	Bare soil / building	1.16	0	Grass land	0.48	2.4	Total		1.64	2.4	Field	Category	Land area	CSV					Complied
Field	Category	Land area	CSV																							
Abandon housing complex	Bare soil / building	1.16	0																							
	Grass land	0.48	2.4																							
Total		1.64	2.4																							
Field	Category	Land area	CSV																							

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		<table border="1"> <tr> <td>Multiple</td> <td>Oil Palm</td> <td>1.64</td> <td>82</td> </tr> <tr> <td>Total</td> <td></td> <td>1.64</td> <td>82</td> </tr> </table> <p>The conclusion of the conversion has improved the carbon stock by 79.6tC.</p> <p>The LUC analysis was reported in the same assessment. The assessment was conducted using Landsat and Sentinel. The results significantly shows the converted land was a housing.</p>	Multiple	Oil Palm	1.64	82	Total		1.64	82	
Multiple	Oil Palm	1.64	82								
Total		1.64	82								
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). - Critical (Major) compliance -</p>	<p>The most current HCV assessment was conducted and reported in December 2015. The assessment was conducted internal by SDP PSQM Department. The SDP internal HCV assessment team was verified and deemed have sufficient expertise in the area of assessment including wildlife, forestry and social.</p> <p>On the land conversion of 1.64ha from abandoned workers housing area, carbon stock assessment was conducted and reported as per 7.12.1. HCS assessment is not applicable as the conversion does not involved forest.</p>	Complied								
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable								
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once</p>	<p>The HCV management plan for Bukit Kerayong estate was developed based on the recommendation of the HCV Assessment report. The HCV report only identified water catchment area of 3ha as HCV 4. The management plan includes regular monitoring and conduct water sampling.</p>	OFI								

	<p>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>The regular monitoring is conducted by Auxiliary Police on monthly basis. Records of monitoring and observation was sighted.</p> <p>The HCV management plan and monitoring could be further improved to ensure consistent implementation:</p> <ol style="list-style-type: none"> 1. Water catchment area water sampling consistency at Bukit Kerayong Estate. 2. The development of Management Plan at Bukit Kerayong Estate can be further improved especially on the proposed completion date. All of the actions are on-going actions but a propose completion date was identified 3. Monitoring records of erosion and encroachment at Bukit Cheraka Estate. <p>The implementation of biodiversity management plan could be improved to demonstrate consistency across the entire SOU 7. At Bukit Cheraka Estate it was demonstrated that management plan of the CSA is available however it was not available in Bukit Kerayong Estate especially at plot P08C and P08A.</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>The conversion at Bukit Kerayong estate was abandon housing to oil palm. The conversion had not caused any rights of local communities. As the conversion involved abandon housing within the certified area, FPIC is not necessary.</p>	Complied
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</p>	<p>The HCV Assessment has not identified any RTE. However continuous education to workers regarding RTE is provided during morning briefing. Signage are in place as part of the efforts to create awareness.</p>	Complied

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	for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -		
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	The land conversion as Bukit Kerayong Estate is from abandon housing to oil palm. Hence other natural ecosystems, peatland conservation areas and RTE is does not exist. For existing HCV at Bukit Kerayong Estate, the monitoring of HCV 4 did not show any significant negative outcome. Although through interview with estate management that the management plan remains, but the 2021 HCV management plan is not available. Refer to indicator 7.12.3.	Complied
7.12.8	(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. - Critical (Major) compliance -	The status of HCV for the land conversion of the abandon housing to oil palm was conducted and reported in the Internal Social & Environmental Impact Assessment (SEIA) Report SOU 7 Bukit Kerayong Estate dated December 2018.	Complied

Appendix B: Approved Time Bound Plan

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

Financial year (July – June)	Targeted	Achieved/Status	Attachments
Jun-08	5 SOUs	<p>Achievement of Timebound Plan Sime Darby Plantation has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets).</p> <p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. A new mill in Liberia is planned to be commissioned.</p> <p>Note: Time-bound plan to achieve 100% RSPO certification has shifted to 2015 .</p>	<p>For details please refer to Attachments:</p> <ul style="list-style-type: none"> i) SDP - RSPO Certification Status for Malaysia Operations ii) SDP- RSPO Certification Status for Indonesia Operations iia) Updates on PT MAS iii) RSPO SCCS status for Sime Darby Plantation (Downstream Operations)
2008/2009	20 SOUs (from Malaysia and Indonesia)		
2009/2010	20 SOUs (from Malaysia and Indonesia)		
2010/2011 (End Dec 2011)	17 SOUs (from Malaysia and Indonesia)		

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Table 2: Details of RSPO Certification Status

Status	Malaysia	Indonesia	Liberia	Total	Remarks
RSPO Certified	33	23	0	56	<p>Malaysia * Effectively 33 Mills (Excluding Bintang Oil Mill) - Note: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down, and Pekaka POM is being mothballed.</p> <p>*SDP acquired Bintang Palm Oil Mill, Talisman Estate, and Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, while Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut. Lian Seng will be incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018, whilst Talisman Estate has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2017. For Bintang Oil Mill, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold as at Dec 2017.</p> <p>Indonesia *Effectively 23 Mills *Note: <i>Angsana Mini POM closed down in 2016. Selabak POM is being mothballed.</i></p>
Planned for Certification / Undergoing Stage 1 or Stage 2 Assessment/ RSPO EB Review	0	1	1	2	<p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p>Indonesia 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>As at Dec 2017, a total of 28,712 Ha of smallholders have been certified. The entire KKPA (1-5) in Sebbaman, KKPA Sg. Cengal, and Plasma TGK and SIA (East and West Plasma) are now RSPO certified with a production capacity of 465,602 mt of FFB. Total scheme smallholders hectares are 51,353 and total communities are 22,613.</p> <p>Certification process for the remaining associated smallholders areas is on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2020.</p> <p>Liberia 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):</p>

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					http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations
Total SOUs	33	24	1	58	Other remarks: In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.

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 '11	11-Aug-20	SPO 550179	
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	
5a	Sg Samak	Teluk Intan, Perak	3 Mar '11	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	
8	East	Carey Island, Selangor	19 May '10	18-May-20	SPO 543543	
9	West	Carey Island, Selangor	19 May '10	18-May-20	SPO 543594	

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9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020	
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019	
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049	
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-819163, SGRSPO/PM/MY13/01284, 824 502 16039, SGS-RSPO/PC17-00004, CURSPO-855480	
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	SPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-24	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU-RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051	
17	Kempas	Jasin, Melaka	20 May '15	19-May-20	RSPO-PC 00101	
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-24	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.

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19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042	
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01	
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-23	RSPO 537872	
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	

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33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	Mill is mothballed, supply base merged into Lavang effective Dec 2017.

Legends

Pending Certification by RSPO	Mill closed down/Mothballed	NA - NOT APPLICABLE
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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/Tanah Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	MUTU-RSPO/011, SGS-RSPO/PC17-00005, SGS-RSPO/PC17-00005	
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	2-Jul-23	MUTU-RSPO/027	
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamakan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	Recertification of Bebunga POM is in progress.
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	

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7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	
9	PT PARI PURNA SWAKARSA	PONDOK LABU	Pamakan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	Recertification of Pondok Labu POM is in progress.
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	Recertification of Rantau Panjang POM is in progress.
12 13	PT LAGUNA MANDIRI	RANTAU BETUNG	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11 1-April-14	05-Feb-22 31-Mar-24	MUTU-RSPO/009 MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU-RSPO/001	
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/015	Mill is mothballed.
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU-RSPO/020	
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	
18 19	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU MANDAH	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16 1-April-14	30-Nov-21 31-Mar-24	MUTU-RSPO/008 MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	

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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	
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-24	MUTU-RSPO/044	
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	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.

Legends

Pending Certification by RSPO	Mill closed down/Mothballed	NA - NOT APPLICABLE
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Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Bukit Kerayong 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 **[Bukit Kerayong Palm Oil Mill]** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.54
PKO	0

Extraction	%
OER	18.31
KER	4.60

Production	t/yr
FFB Process	125,257.73
CPO Produced	22,934.57
PKO Produced	5,767.54

Land Use	Ha
OP Planted Area	8,574.76
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	8,574.76

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	31,976.31	0.29	11.68	0.56	0	0	31,987.98	0.26
CO ₂ Emission from fertilizer	4,289.94	0.04	0.95	0.05	0	0	4,290.89	0.03
NO ₂ Emission	2,633.65	0.02	0.49	0.02	0	0	2,634.14	0.02
Fuel Consumption	594.87	0.01	0.10	0	0	0	594.97	0
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-51,489.16	-0.46	-11.07	-0.53	0	0	-51,500.23	-0.41

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Conservation Sequestration	0	0	0	0	0	0	0	0
Total	- 11,994.39	- 0.11	2.15	0.10	2,286.15	0	-9,706.09	- 0.08

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	2,4552.64	0.20
Fuel Consumption	147.75	0.00
Grid Electricity Utilization	642.01	0.01
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	2,5342.39	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	Jan 2020	7,005.11	0	7,005.11
2	Feb 2020	10,938.33	0	10,938.33
3	Mar 2020	13,022.85	0	13,022.85
4	Apr 2020	11,318.82	0	11,318.82
5	May 2020	11,348.80	0	11,348.80
6	June 2020	12,549.84	0	12,549.84
7	July 2020	11,305.72	0	11,305.72
8	Aug 2020	8,182.52	964.96	9,147.48
9	Sept 2020	7,978.73	2,654.57	10,633.30
10	Oct 2020	6,884.96	3,475.33	10,360.29
11	Nov 2020	6,506.12	2,671.40	9,177.52
12	Dec 2020	4,721.96	3,681.72	8,403.68
13	Total	111,763.76	13,447.98	125,211.74
Note:				

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Jan 2020	1,379.87	552.37
2	Feb 2020	2,254.90	631.09
3	Mar 2020	2,675.23	756.25
4	Apr 2020	2,306.46	548.98
5	May 2020	2,257.46	602.44
6	June 2020	2,568.73	620.30
7	July 2020	2,278.27	508.25
8	Aug 2020	1,723.69	436.91
9	Sept 2020	1,675.22	390.32
10	Oct 2020	1,480.65	357.06
11	Nov 2020	1,313.75	314.44
12	Dec 2020	949.99	206.56
	Total	22,864.22	5,924.97
Note:			

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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	ABC	TR-d2b6c23f-b033 TR-8ecb64d1-0745 TR-3307b2d3-9d23 TR-34e413b4-33d3 TR-063c3bde-8b7f TR-6b24c84a-4846 TR-4b961dfd-09ba TR-d344e0c1-7e88 TR-212d2b21-7116 TR-67dc6dbd-0422 TR-7f589e7a-2eeb TR-9e6a1ca8-531d TR-3b2a5d8c-10fe TR-2f32e930-1df9 TR-03bd25fc-9e0c TR-7bb2c976-901e TR-c500b9c0-79e1 TR-84b32462-d04b TR-4c022a9a-7434 TR-fb6754b3-19cc TR-0674d45e-b701 TR-128a641f-6a54 TR-2e5279a3-33fa TR-e8bcb231-fde2 TR-45425c64-6f98 TR-6c16cb79-f5b3 TR-80c588d8-5073 TR-c6838a9f-0938 TR-198f7850-7298 TR-3c997500-b817 TR-8398463e-3819 TR-b18ad9e0-9435 TR-ecb9661f-e651 TR-6c7f2b3b-5ae0 TR-567a6671-e2a5 TR-c0246a15-6b82	4,689.32	0

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		TR-a203b67a-c42a		
2		TR-5567578b-a3f0 TR-5ee390c9-bfd6 TR-c1069061-b188 TR-7f589e7a-2eeb TR-84b32462-d04b TR-4c022a9a-7434 TR-86951732-7812 TR-ec905cbd-4df9 TR-139c1573-6d6d TR-fec9fcd0-824b	0	3,433.26
	DEF			
	Total		4,689.32	3,433.26
Note:				

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)
	Nil			
Note:				

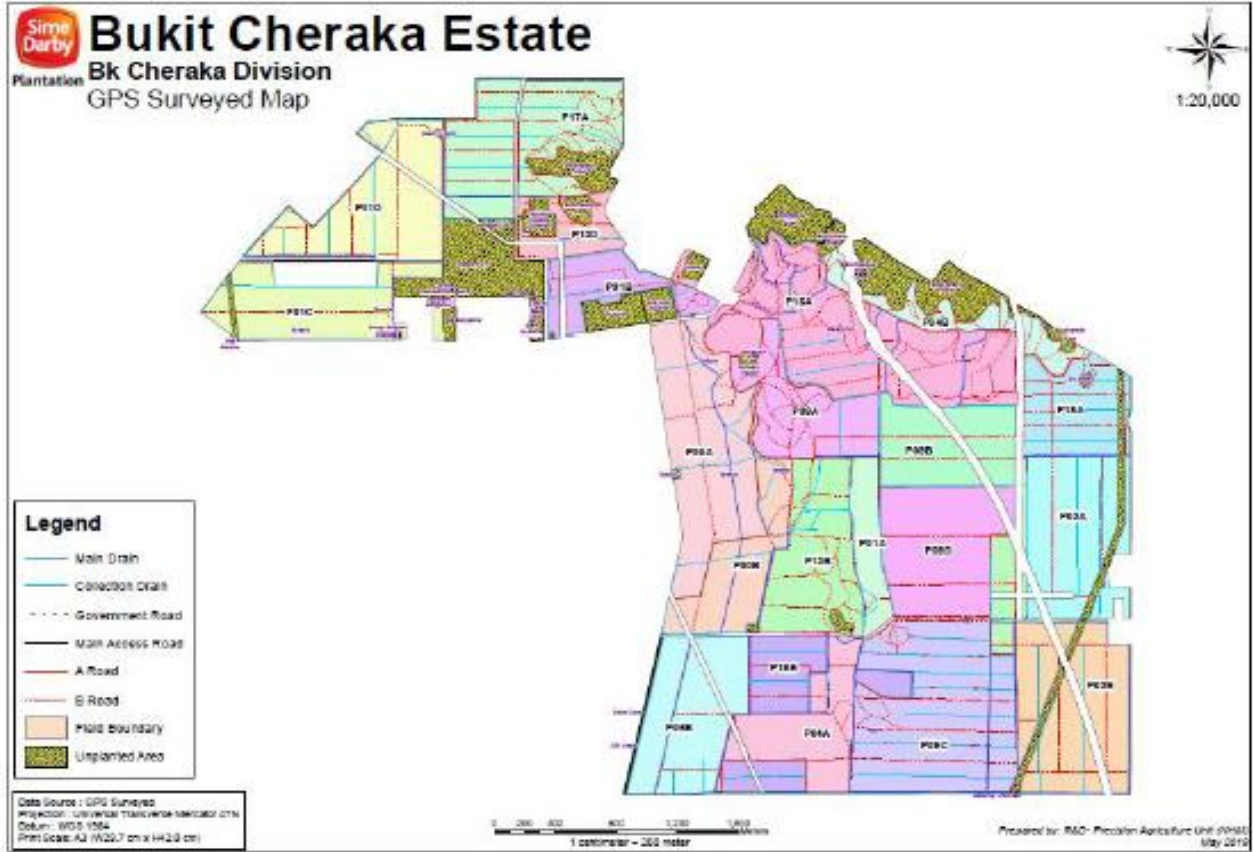
E. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name		CPO Sold (mt)	PK Sold (mt)
1	A		0	1,861.81
2	B		17,926.76	0
	Total		17,926.76	1,861.81
Note:				

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

Appendix E: Location Map of Certification Unit and Supply bases



Appendix F: Bukit Kerayong and Bukit Cheraka Field Map



Appendix G: List of Smallholder Sampled

Not Applicable

Appendix H: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
BKOM	Bukit Kerayong Oil Mill
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSA	Conservation Set Aside
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
ERP	Emergency Response Plan
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
IOM	Inter office mail
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
RSQM	Regional Sustainability & Quality Management
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SDPSB	Sime Darby Plantation Sdn Bhd