

**RSPO PRINCIPLE AND CRITERIA –  
Recertification Assessment (RC)  
Public Summary Report**

<b>TDM Plantation Sdn Bhd</b>
Client company Address: Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu Terengganu, Malaysia
Certification Unit:  <b>Sungai Tong Palm Oil Mill</b> Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu 21500 Setiu Terengganu, Malaysia

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0095-11-000-00	<b>Membership Approval Date</b>	28/02/2011
<b>Parent Company Name</b>	TDM Plantation Sdn Bhd		
<b>Address</b>	Level 3, Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Terengganu, Malaysia		
<b>Subsidiary (Certification Unit Name)</b>	Sungai Tong Palm Oil Mill		
<b>Address</b>	Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu 21500 Setiu Terengganu, Malaysia		
<b>Contact Name</b>	Tn Hj Hassan Bin Osman (Mill)		
<b>Website</b>	<a href="http://www.tdmberhad.com.my/#1">http://www.tdmberhad.com.m y/#1</a>	<b>E-mail</b>	<a href="mailto:hassan.tdmp@tdmberhad.com.my">hassan.tdmp@tdmberhad.com.my</a> <a href="mailto:ksst.tdmp@tdmberhad.com.my">ksst.tdmp@tdmberhad.com.my</a>
<b>Telephone</b>	09-620 4802 (Head office) 09-824 7299 (Mill)	<b>Facsimile</b>	09-620 4803 (Head office) 09-824 7298 (Mill)

2. Certification Information			
<b>Certificate Number</b>	RSPO 595564	<b>Date of First Certification</b>	27/12/2013
		<b>Certificate Start Date</b>	26/12/2018
		<b>Certificate Expiry Date</b>	26/12/2023
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production from Sg Tong Palm Oil Mill and supply base (Jaya, Fikri, Tayor, Pelong, Jerangau & Pinang Emas Estate)		
<b>Applicable Standards</b>	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E Mass Balance)		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
MSPO 678754	MS2530-4:2013 MSPO Part 4: General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	26/12/2022
MSPO 686825	MS2530-3:2013 MSPO Part 3: General Principles for Oil Palm Plantations and Organized Smallholders		26/12/2022

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base)</b>	<b>Location [Map Reference #]</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Sungai Tong Palm Oil Mill	Lot 7663, Batu 23, Jalan Kuala Terengganu – Kota Bharu, 21500 Setiu, Terengganu, Malaysia	5° 18' 29.88" N	102° 54' 37.80" E
Jaya Estate	Jalan Kuala Terengganu – Kota Bharu, 21500 Setiu, Terengganu, Malaysia	5° 23' 43.61" N	102° 53' 03.32" E
Fikri Estate	Jalan Kuala Terengganu – Kota Bharu, 21500 Setiu, Terengganu, Malaysia	5° 19' 21.50" N	102° 53' 46" E
Tayor Estate	Jalan Kuala Terengganu – Kota Bharu, 21500 Setiu, Terengganu, Malaysia	5° 15' 58.00" N	102° 53' 26.00" E
Pelong Estate	Jalan Kuala Terengganu – Kota Bharu, 21500 Setiu, Terengganu, Malaysia	5° 16' 55.56" N	102° 49' 59.52 E
Jerangau Estate	Jalan Jerangau, 21810 Ajil, Hulu Terengganu, Terengganu, Malaysia	4° 57' 41.50" N	103° 9' 47.00" E
Pinang Emas Estate	Bukit Besi, 23000 Dungun, Terengganu, Malaysia	4° 45' 39.96" N	103° 13' 25.68" E

<b>5. Description of Supply Base</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Jaya Estate	3,365.50	0	90.29	3,455.79	97.39%
Fikri Estate	3,103.85	0	607.20	3,711.05	83.64%
Tayor Estate	2,127.27	5.00	142.41	2,274.68	93.52%
Pelong Estate	1,718.18	305.88*	993.14	3,017.20	56.95%
Jerangau Estate	1,436.57	0	14.06	1,450.93	97.01%
Pinang Emas Estate	2,823.91	0	847.01	3,670.92	76.93%
<b>Total</b>	<b>14,575.28</b>	<b>310.88</b>	<b>2,694.10</b>	<b>17,580.27</b>	<b>82.76%</b>

\*Management plan will be review in the next assessment

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<b>6. Plantings &amp; Cycle</b>							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Jaya Estate			2,920.72	444.78		3,365.50	0
Fikri Estate	243.36	82.36	2,018.00	760.13		2,860.49	243.36
Tayor Estate	304.09	35.50	995.29	594.29	198.10	1,823.18	304.09
Pelong Estate	1,037.74		304.54	375.90		680.44	1,037.74
Jerangau Estate	201.98	479.61		159.11	595.87	1,234.59	201.98
Pinang Emas Estate	600.39	139.75	822.89	1,260.88		2,223.52	600.39
<b>Total (ha)</b>	<b>2,387.56</b>	<b>737.22</b>	<b>7,061.44</b>	<b>3,595.09</b>	<b>793.97</b>	<b>12,187.72</b>	<b>2,387.56</b>

<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>			
Estate	Tonnage / year		
	Estimated (Jan 2018 – Dec 2018)	Actual (Sept 2017 – Sept 2018)	Forecast (Jan 2019 – Dec 2019)
Jaya Estate	75,800.00	71,410.46	67,400.00
Fikri Estate	60,200.00	52,733.22	49,500.00
Tayor Estate	42,000.00	36,710.38	29,430.00
Pelong Estate	10,600	9,445.14	6,100.00
Jerangau Estate	25,800.00	15,563.77	14,200.00
Pinang Emas Estate	0.00	2,607.62	5,700.00
<b>Total</b>	<b>214,400.00</b>	<b>188,470.59</b>	<b>172,330.00</b>

<b>8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *</b>			
Estate	Tonnage / year		
	Estimated (Jan 2018 – Dec 2018)	Actual (Sept 2017 – Sept 2018)	Forecast (Jan 2019 – Dec 2019)
Gajah Mati Estate	N/A	388.69	N/A
<b>Total</b>		<b>388.69</b>	

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<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
Independent FFB Supplier	Tonnage / year		
	Estimated (Jan 2018 – Dec 2018)	Actual (Sept 2017 – Sept 2018)	Forecast (Jan 2019 – Dec 2019)
PTK	0.00	1,961.60	60,000.00
Total	0.00	1,961.60	60,000.00

<b>10. Certified Tonnage</b>			
	Estimated (Jan 2018 – Dec 2018)	Actual (Sept 2017 – Sept 2018)	Forecast (Jan 2019 – Dec 2019)
	<b>Mill Capacity: 60 MT/hr</b>	<b>FFB</b>	<b>FFB</b>
214,400.00		188,859.28	172,330.00
<b>SCC Model: MB</b>	<b>CPO (OER: 20.94%)</b>	<b>CPO (OER:18.70 %)</b>	<b>CPO (OER:20.50 %)</b>
	44,895.36	35,321.36	35,327.65
	<b>PK (KER:5.51 %)</b>	<b>PK (KER:4.64%)</b>	<b>PK (KER:5.00 %)</b>
	11,813.44	8,755.28	8,616.50

1. The Actual volume figure in table was from 2 period ( Sept 17 – Dec 17 and Jan 18 – Sept 18)
2. FFB received for the period Sept 17 – Dec 17 was 85,056.78 mt while for the period Jan 18 – Sept 18 was 103,802.50 mt
1. Total CPO produced for the period Sept 17 – Dec 17 was 15,278.54 mt while for the period Jan 18 – Sept 18 was 20,042.82 mt
2. Total PK produced for the period Sept 17 – Dec 17 was 4,098.82 mt while for the period Jan 18 – Sept 18 was 4,656.46 mt

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<b>11. Actual Sold Volume (CPO)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>CPO (MT)</b>	10,473.12			24,605.95	35,079.07

**Note:**

1. The Actual volume figure in table was from 2 period ( Sept 17 – Dec 17 and Jan 18 – Sept 18)
2. Actual sold volume-CPO (RSPO certified) for the period Sept 17 – Dec 17 was 5,134.88 mt while for the period Jan 18 – Sept 18 was 5,338.24 mt
3. Actual sold volume-CPO (conventional) for the period Sept 17 – Dec 17 was 7,215.92 mt while for the period Jan 18 – Sept 18 was 17,390.03 mt

<b>12. Actual Sold Volume (PK)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>PK (MT)</b>	5,040.00			3,544.89	8,584.89

**Note:**

1. The Actual volume figure in table was from 2 period ( Sept 17 – Dec 17 and Jan 18 – Sept 18)
2. Actual sold volume-PK (RSPO certified) for the period Sept 17 – Dec 17 was 2,121.60 mt while for the period Jan 18 – Sept 18 was 2,918.40 mt
3. Actual sold volume-PK (conventional) for the period Sept 17 – Dec 17 was 1,934.62 mt while for the period Jan 18 – Sept 18 was 1,610.27 mt

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



## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: ASI-ACC-067)  
Unit 3, Level 10, Tower A  
The Vertical Business Suites, Bangsar South  
No. 8, Jalan Kerinchi  
59200 Kuala Lumpur  
Tel +603 2242 4211 Fax +603 2242 4218  
Nicholas Cheong: [Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com)  
[www.bsigroup.com](http://www.bsigroup.com)

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### 2.1 Assessment Methodology, Programme, Site Visits

The on-site recertification assessment was conducted from 01-04/10/2018. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on 25/11/2018. The audit programmes 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 & Criterias 2013 (MY-NI 2014) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment where the stakeholder notification was made on 31/07/2018 through BSI & RSPO website as per following link: [https://www.rspo.org/certification/public-announcement?keywords=sandakan&country=&assessment\\_type=](https://www.rspo.org/certification/public-announcement?keywords=sandakan&country=&assessment_type=)

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

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

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

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

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Sungai Tong Palm Oil Mill	√	√	√	√	√
Jaya Estate	√			√	
Fikri Estate		√			√
Tayor Estate			√		
Pelong Estate		√			√
Jerangau Estate			√		
Pinang Emas Estate	√			√	

**Tentative Date of Next Visit:** September 16, 2019 – September 19, 2019

**Total No. of Mandays:** 10 mandays including 1.0 day SC for mill.

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**2. 2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Mohd Hafiz Mat Hussain	Team Leader	He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an 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 2013, Endorsed RSPO P&C Lead Auditor Course in 2014 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since May 2013 in more than various companies in Malaysia. During this assessment, he assessed on the RSPO Supply Chain elements, aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation.
Hu Ning Shing	Team Member	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.
Muhammad Fadzli Bin Masran	Team Member	He graduated in Bachelor of Forestry Science at University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He had accumulated auditing experience when he was the internal auditor for ISO9001 and ISO14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. During this assessment, he assessed on the aspects of environmental and estate best practise. He is fluent in Bahasa Malaysia and English languages.

**Accompanying Persons:**

<b>No.</b>	<b>Name</b>	<b>Role</b>

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### 2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment.

Sunday, 30/9/2018	PM	Travel to Terengganu (TH Hotel)	√	-	-
Monday, 1/10/2018	09:00–12:30	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening presentation by audit team leader</li> <li>• Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation)</li> <li>• Verification on previous audit finding</li> </ul>	√	-	-
		<b>RSPO Supply Chain</b> for Sg Tong POM General Chain of custody: Element 5.1 – 5.13	√	-	-
	12:30–13:30	LUNCH			
	13:30–16:30	<b>RSPO Supply Chain</b> for Sg Tong POM CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance	√	-	-
	16:30-17:00	Interim Closing Briefing	√	-	-
	PM	Travel to Terengganu (TH Hotel)	-	√	√
Tuesday, 2/10/2018	09:00–12:30	<b>Sg Tong POM</b> 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.	√	√	√
		LUNCH			
	13:30–16:30	<b>Sg Tong POM:</b> Document Review P1 – P8: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	√	√	√
	16:30-17:00	Interim Closing Briefing	√	√	√
Wednesday, 3/10/2018	09:00-12:30	<b>Jaya Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
		10:00–12:30	<b>Meeting with stakeholders at Sg Tong Training Centre</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-
	12:30–13:30	LUNCH			
	13:30–16:30	<b>Jaya Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16:30–17:00	Interim Closing Briefing	√	√	√
Thursday, 4/10/2018	09:00-12:30	<b>Pinang Emas Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area	√	√	√

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		(agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.			
	12:30–13:30	<b>LUNCH</b>			
	13:30–15:30	<b>Pinang Emas Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	15:30	Verify any outstanding issues & Preparation for closing Meeting	√	√	√
	16:00-17:00	Closing Meeting	√	√	√
Friday, 5/10/2018	AM	Travel back to KL	√	√	√

### Section 3: Assessment Findings

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

- TDM Plantation Sdn Bhd / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

#### 3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
<b>Summary of the Time Bound Plan</b>		
Does the plan include all subsidiaries, estates and mills?	The time bound plan includes all operating units in Malaysia	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	All the estates and mills certified within five years	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul>	The TBP is challenging due to the increasing regulations in the local laws including the current focus of the company's management to implement MSPO which is a mandatory requirement.	Yes
Have there been any changes since the last audit? Are they justified?	No changes since last audit	Yes
If there have been changes, what circumstances have occurred?	N/A	N/A
Have there been any stakeholder comments?	To-date, no comments received from stakeholders on the TBP.	Yes
Have there been any newly acquired subsidiaries?	No	Yes
If yes, have the newly acquisitions certified within a three-year timeframe?	N/A	N/A

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Have there been any isolated lapses in implementation of the plan?	No	Yes
<b>Un-Certified Units or Holdings</b>		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	No uncertified units.	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	Any new NPP will be submitted but during this audit, the NPP for Pelung Estate is still in progress.	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.	There's no land conflicts reported against the company	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	To-date, no complaints on labour disputes received by the company.	Yes
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	None so far. No stakeholder comments or complaints received.	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	No uncertified units.	Yes

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

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

### 3.4 Details of findings

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

During the Certification Assessment there were two (2) Major & one (1) Minor nonconformities raised. The Sungai Tong Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1687913-201808-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.1.3 Major
<b>Date Issued</b>	04/10/2018	<b>Due Date</b>	01/01/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	25/11/2018
<b>Statement of Nonconformity:</b>	Mechanism to ensure the compliance of the overtime limit was not properly implemented. The nonconformity was escalated from Minor to Major during Recertification Audit.		
<b>Requirement Reference:</b>	A mechanism for ensuring compliance shall be implemented.		
<b>Objective Evidence:</b>	Verified the Check Roll Logbook found that sampled workers below have worked more than 130 hours and interviewed with the workers confirmed that the monitoring system of overtime has captured the 2 to 4 hours' rest time. The workers did not thumb out even they were away from work station for break. Sampled of workers as below:		
	<b>Employee ID</b>	<b>Month</b>	<b>Total Hours</b>
	SM 00084	November 2017	150
		December 2017	131
		January 2018	139
	SM 00062	November 2017	148
		January 2018	136
	SM 00085	November 2017	142
		December 2017	138
	SM 0900197	January 2018	136
		February 2018	133
		August 2018	147
	SM 0900219	January 2018	136
		April 2018	136
July 2018		136	
August 2018		136	



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	SM 0900167	November 2017	154																																				
		December 2017	136																																				
<b>Corrections:</b>	<p>Mill management have conducted a session with all check roll officer to brief and explain about limitation of overtime and memorandum letter dated 1st October 2018 has been issued to them to handle this matter.</p> <p>Check Roll Logbook will be monthly check by mill management and check roll officer are compulsory to fill up Incentive Form if they insist to reward their worker.</p>																																						
<b>Root Cause Analysis:</b>	<p>Overtime are not properly monitored by mill management. Check roll officer promise the worker with extra payment through overtime without considering limitation of overtime or getting approval from their superior.</p>																																						
<b>Corrective Actions:</b>	<p>Overtime will be monitored through checklist/ log book provided by mill management. The checklist will include gang, name of worker, month, date, overtime hour, overtime details, etc and will be verified by Assistant Manager and approved by Mill Manager weekly.</p> <p>Verification during Major onsite verification:</p> <ol style="list-style-type: none"> <li>Briefing on overtime guideline and explanation by the management of Sg Tong POM was done on 23/10/18 and 7/11/2018. Sighted the attendance list for both briefing conducted.</li> <li>Checkroll book and checklist for monitoring on overtime for operators and security were sighted:</li> </ol> <table border="1"> <thead> <tr> <th>Employee ID</th> <th>Month</th> <th>Total Hours</th> </tr> </thead> <tbody> <tr> <td rowspan="2">SM 00084</td> <td>October</td> <td>100</td> </tr> <tr> <td>November (15/11/10)</td> <td>48</td> </tr> <tr> <td rowspan="2">SM 0006</td> <td>October</td> <td>83</td> </tr> <tr> <td>November (15/11/10)</td> <td>42</td> </tr> <tr> <td rowspan="2">SM 00085</td> <td>October</td> <td>108</td> </tr> <tr> <td>November (15/11/10)</td> <td>60</td> </tr> <tr> <td rowspan="2">SM 090019</td> <td>October</td> <td>123</td> </tr> <tr> <td>November (20/11/10)</td> <td>60</td> </tr> <tr> <td rowspan="2">SM 0900219</td> <td>October</td> <td>130</td> </tr> <tr> <td>November (22/11/10)</td> <td>85</td> </tr> <tr> <td rowspan="2">SM0900208</td> <td>October</td> <td>120</td> </tr> <tr> <td>November (15/11/10)</td> <td>63</td> </tr> <tr> <td>SM 0900167</td> <td>Upgraded to staff at KPOM</td> <td></td> </tr> </tbody> </table> <ol style="list-style-type: none"> <li>Interviewed with the management confirmed that they were monitored on wekkly basis. Sighted the weekly checklist for overtime.</li> </ol>			Employee ID	Month	Total Hours	SM 00084	October	100	November (15/11/10)	48	SM 0006	October	83	November (15/11/10)	42	SM 00085	October	108	November (15/11/10)	60	SM 090019	October	123	November (20/11/10)	60	SM 0900219	October	130	November (22/11/10)	85	SM0900208	October	120	November (15/11/10)	63	SM 0900167	Upgraded to staff at KPOM	
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<b>Assessment Conclusion:</b>	Corrective action is found to be effective, thus the major NC was closed on 25/11/18 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.
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Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1687913-201808-M2	<b>Clause &amp; Category (Major / Minor)</b>	RSPO SCCS 5.3.2 Major
<b>Date Issued</b>	04/10/2018	<b>Due Date</b>	01/01/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	25/11/2018
<b>Statement of Nonconformity:</b>	The SOP for RSPO Supply Chain (TDM/KPOM/STPOM/01), Revision: Mill01/2018, Dated July 2018 was not effectively implemented		
<b>Requirement Reference:</b>	ii) effectively implements and maintains the standard requirements within its organization		
<b>Objective Evidence:</b>	The competency for lead auditor was not evident where the procedure stated that the lead auditor shall be competently train in Supply Chain System & Standard.		
<b>Corrections:</b>	<p>The company will send below personnel to attend Supply Chain Lead Auditor Course, endorsed by Mr. David Ogg (Checkmark Training) in January 2019.</p> <ol style="list-style-type: none"> <li>1. Mohd Izwan Hafez bin Che Azmi</li> <li>2. Norwati binti Mamat</li> <li>3. Wan Ahmad Amilin bin Wan Ngah</li> </ol>		
<b>Root Cause Analysis:</b>	Internal audit for SCCS is still new for the company thus unavailability of competent internal auditors.		
<b>Corrective Actions:</b>	<p>We have sent an email to Mr. David and CC to you requesting their quotation and the exact date for the training. Pending Mr. David's reply for the quotation and exact training date. Please refer the email dated 21st October 2018.</p> <p>Verification during Major onsite verification:</p> <ol style="list-style-type: none"> <li>1. The communication between the management and David Ogg CheckMarkTraining was sighted. The training will be conducted 17-18 January 2019. The quotation by Mr David for 3 participants (Mohd Izwan Hafez bin Che Azmi, Norwati binti Mamat, Wan Ahmad Amilin bin Wan Ngah) from TDM Plantations was sighted.</li> </ol>		
<b>Assessment Conclusion:</b>	Corrective action is found to be effective, thus the major NC was closed on 25/11/18 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.		

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<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1687913-201808-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.10.4 Major
<b>Date Issued</b>	04/10/2018	<b>Due Date</b>	Next year surveillance assessment
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	N/A
<b>Statement of Nonconformity:</b>	The payment for the contractor was not paid according to the term stated in agreement.		
<b>Requirement Reference:</b>	Agreed payments shall be made in a timely manner		
<b>Objective Evidence:</b>	<p>Sampled the invoices submitted by contractor in Sungai Tong POM and e-Payment voucher issued by Head Office found that payment was made not according to the agreed terms as below:</p> <p>a. Invoice# 252/18 dated 30/6/2018 and submitted to mill management on 12/7/2018 e-Payment Voucher Ref. No.# JV 41560 dated 3/9/2018</p> <p>b. Invoice# 275/18 dated 23/7/2018 and submitted to mill management on 23/7/2018 e-Payment Voucher Ref. No.# JV 41560 dated 3/9/2018</p> <p>c. Invoice# 224/18 dated 31/5/2018 and submitted to mill management on 7/6/2018 e-Payment Voucher Ref. No.# JV 0040695 dated 5/7/2018</p> <p>d. Invoice# 181/18 dated 30/4/2018 and submitted to mill management on 14/5/2018 e-Payment Voucher Ref. No.# JV 0040391 dated 10/6/2018</p> <p>e. Invoice# 238/18 dated 30/5/2018 and submitted to mill management on 1/7/2018 e-Payment Voucher Ref. No.# JV 0040990 dated 30/7/2018</p>		
<b>Corrections:</b>	<p>All the invoices have been properly paid and cleared but not in the agreed time frame thus the need to revise the agreement based on the company's financial condition currently not in a favourable condition.</p> <p>The company will issue an apologize letter to the transporter explaining the reason on the late payment clearance.</p>		
<b>Root Cause Analysis:</b>	<p>The agreement was made earlier this year and during that time the company was still in a stable financial state which the situation differs now when the price of CPO went downhill and affecting the whole company operations including timely payment of services.</p> <p>It was also found that the clause in the agreement should mention "14 days from the date of invoice receival" NOT "14 days from the date of invoice".</p>		
<b>Corrective Actions:</b>	To review current Agreement between TDM Plantation Sdn. Bhd. and Transporter ended 31st December 2018.		
<b>Assessment Conclusion:</b>	The CAP was accepted, however the effectiveness of the corrective action will be verified during next assessment.		

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	N/A

Positive Findings	
PF #	Description
PF 1	Positive feedback from stakeholders

### 3.4.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity			
<b>NCR Ref #</b>	1532946-201709-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.1.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	27/11/2017
<b>Statement of Nonconformity:</b>	The disposal of schedule waste is not according to the EQA 1974		
<b>Requirement Reference:</b>	Evidence of compliance with relevant legal requirements shall be available		
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>i. In Jerangau Estate, there are no up to date inventory records of the waste and scheduled waste generated. The inventory shall be minimum following 5th Schedule of the EQA Act 1974 – Environmental Quality (Scheduled Waste) Regulations 2005.</li> <li>ii. In Tayor Estate, the inventory of the scheduled wastes are not categories as required by 5th Schedule of the EQA Act 1974 – Environmental Quality (Scheduled Waste) Regulations 2005.</li> <li>iii. The scheduled waste storage at Tayor Estate have not been identified as according to the scheduled waste categories. The segregation of the scheduled waste are not able to identify the type of schedule waste generated.</li> <li>iv. The Scheduled Wastes for POM, Jerangau and Tayor are not recorded when is first generated and the wastes are disposed according to the EQA Act 1974 Section 9 (5) where the waste shall be disposed 180 days from its first generated</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) SW Form will be filled up by the Storekeeper or his assistant once SW is generated.</li> <li>ii) Estate and Mill to update scheduled waste records by end of month for every month into eswiss. Estate and Mill management will hire Pentas Flora (Terengganu) Sdn. Bhd to make sure the disposal time of scheduled waste are not more than 180 days.</li> <li>iii) The management have sent five (5) personnel to attend the Schedule Waste Management Course (CePSWAM) in August 2017. There will be a competent person in each mill and one in each complex which are Kemaman Complex, Bukit Besi Complex and Sungai Tong Complex. The competent person for the estates will represent 4 estates in each complex</li> </ul>		
<b>Assessment Conclusion:</b>	<p><u>Major NC close out verification:</u></p> <ul style="list-style-type: none"> <li>i) Latest 5th schedule/inventory for Sg Tong POM, Ladang Tayor and Ladang Jerangau</li> <li>ii) Latest disposal records/6th schedule for Jerangau Estate. No latest disposal records for Sg Tong POM and Tayor Estate</li> </ul>		

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	<p>iii) CePSWaM competent certificates for Sg Tong POM, SgTong complex (Fikri Estate) and Bukit Besi complex (Jerangau Estate)</p> <p>Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence.</p> <p><u>Verification during recertification assessment:</u> Verified during audit the mill and estate has established and maintained the recording of SW inventory as per 5<sup>th</sup> schedule/inventory. Sighted the inventory records for Sg. Tong POM filled by the store keeper and approved by the compliance executive for the month of May – September 2018.</p> <p>For Sg. Tong POM, the CePSWaM competent person was the compliance executive.</p> <p>Thus, the implementation of the corrective action found to be effective.</p>
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Non-Conformity			
<b>NCR Ref #</b>	1532946-201709-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.2.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	27/11/2017
<b>Statement of Nonconformity:</b>	<p>Referring to the agreement between TDM Bhd and Kumpulan Ladang-Ladang Terengganu Sdn Bhd. not all the lands are included in the Agreement (e.g. Lot 406 at Jerangau Estate).</p> <p>Referring to the land titles at Tayor Estate e.g. Lot 1141, 1140, 97, 94, 54 at Tayor) and Jerangau Estate (e.g. Lot 406), the ownership is Perbadanan Kemajuan Iktisad Negeri Terengganu. There is no evidence available that TDM Plantations Sdn Bhd has the legal rights to use the land.</p>		
<b>Requirement Reference:</b>	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.		
<b>Objective Evidence:</b>	<p>Referring to the agreement between TDM Bhd and Kumpulan Ladang-Ladang Terengganu Sdn Bhd. not all the lands are included in the Agreement (e.g. Lot 406 at Jerangau Estate).</p> <p>Referring to the land titles at Tayor Estate e.g. Lot 1141, 1140, 97, 94, 54 at Tayor) and Jerangau Estate (e.g. Lot 406), the ownership is Perbadanan Kemajuan Iktisad Negeri Terengganu. There is no evidence available that TDM Plantations Sdn Bhd has the legal rights to use the land.</p>		
<b>Corrective Actions:</b>	All the estate's proper Land Use Rights documentations is made available at the operation sites for reference		
<b>Assessment Conclusion:</b>	<p><u>Major NC close out verification:</u></p> <p>Verified letter from PMINT, ref# PMIN.TR.100/PB dated 12 November 2017 to confirm that PMINT land was leased to KLLT and managed by TDM Plantation Sdn Bhd. Lease agreement is still in the progress and will be further verified in the next assessment. Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence.</p> <p><u>Verification during recertification assessment:</u></p> <p>All the documents related to land title was available during the assessment. Thus, the implementation of the corrective action found to be effective.</p>		

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Non-Conformity			
<b>NCR Ref #</b>	1532946-201709-M3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.1.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	27/11/2017
<b>Statement of Nonconformity:</b>	EIA was not conducted for significant environmental impacting operation		
<b>Requirement Reference:</b>	An environmental impact assessment (EIA) shall be documented		
<b>Objective Evidence:</b>	As per indicator 5.1.1 an EIA is required for parameter drain construction (e.g. Putting in drainage or irrigation systems). The drain construction was observed in Tayor Estate		
<b>Corrective Actions:</b>	Training has been provided by SRA to the all assistant managers and compliance clerk. Training plan was developed by TDMP for continuous improvement for ensuring environmental compliances.		
<b>Assessment Conclusion:</b>	<p><u>Major NC close out verification:</u></p> <p>i) Environmental aspect impact, EAI/2017/02-02 for drain construction.</p> <p>ii) SRA EIA training records dated 19/11/17.</p> <p>Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment</p> <p><u>Verification during recertification assessment:</u></p> <p>Mill and Estate visited has include building/drain construction in the EAI. Sighted the training records for SRA EIA training dated 19/11/17.</p> <p>Thus, the implementation of the corrective action found to be effective.</p>		

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<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1532946-201709-M4	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.6.12 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	27/11/2017
<b>Statement of Nonconformity:</b>	There is no monitoring system established to identify pregnant workers especially for spraying activity.		
<b>Requirement Reference:</b>	No work with pesticides shall be undertaken by pregnant or breast-feeding women.		
<b>Objective Evidence:</b>	Jerangau Estate 1. I/C No: 840919-03-5260, diagnose pregnant 3 months on May 17 (Letter notification for reassignment of work on 18/5/17). 2. I/C No: 830109-03-5294, diagnose pregnant 3 months on July 17 (Letter notification for reassignment of work on 23/7/17).		
<b>Corrective Actions:</b>	The female workers are not allowed to conduct activities which related to chemicals handling. If the need for female workers in the chemical handling area are critical, the management will assign assistant HA to check the worker's menstrual period by monthly. Training has been provided to females workers regarding reproductive		
<b>Assessment Conclusion:</b>	<p><u>Major NC close out verification:</u>            Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.            Major NC close out verification :</p> <ul style="list-style-type: none"> <li>i) Internal training for reproductive was done on 22/10/2017</li> <li>ii) Based on latest check roll record and workers master list, no female sprayer at Jerangau and Tayor Estate.</li> </ul> <p><u>Verification during recertification assessment:</u></p> <p>At Jaya Estate, based on interview with female sprayers confirmed knowledge of the policy of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding. All the female sprayers interviewed were not pregnant.</p> <p>At Pinang Emas Estate, there was no female sprayers.</p> <p>Thus, the implementation of the corrective action found to be effective.</p>		



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<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1532946-201709-M5	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.2 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	27/11/2017
<b>Statement of Nonconformity:</b>	HIRARC was not adequately identify on the new activity involved in the mill/estate		
<b>Requirement Reference:</b>	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.		
<b>Objective Evidence:</b>	The new activity was not adequately identified in HIRARC: 1. Construction of new pump house (BOMBA) at STPOM 2. New nursery at Tayor Estate (filling soil into polybags, culling activity, p&d activity)		
<b>Corrective Actions:</b>	RSPO Sustainability and Standardization Audit email communication by SHO dated 25/11/2017 requesting all Operating Unit to update the SHO for any new and or unusual activities to in order the Safety & Health Committee to revise the HIRARC.		
<b>Assessment Conclusion:</b>	<p><u>Major NC close out verification</u> Major NC close out verification: The above evidences were check and verified. Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.</p> <p><u>Verification during recertification assessment:</u> <b>Sg Tong POM</b> HIRARC was established to include all the activities in the mill including construction site. HIRARC register was last reviewed on 19/9/2018 after accident happened for activity manual heavy lifting.</p> <p><b>Jaya Estate</b> HIRARC was established to include all the activities in the estate including construction site. HIRARC register was last reviewed on 1/1/2018. The HIRARC related to the drainage &amp; irrigation, general work, harvesting, pruning &amp; raking, road &amp; bridges, security, store, transporting workers, manuring, weeding were reviewed.</p> <p><b>Pinang Emas Estate</b> HIRARC was established to include all the activities in the estate including construction site. HIRARC register was last reviewed on 20/8/18 after the accident for pruning activity in August 2018. After revised the HIRARC, the management has conduct the training for pruning activity on 26/8/18. The HIRARC related to the drainage &amp; irrigation, general work, harvesting, pruning &amp; raking, road &amp; bridges, security, store, transporting workers, manuring, weeding were reviewed</p> <p>Thus, the implementation of the corrective action found to be effective.</p>		

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<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1532946-201709-M6	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.1.3 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	27/11/2017
<b>Statement of Nonconformity:</b>	No specific timeline to mitigate the negative impacts and promotion of positive impacts was not available in the action plan.		
<b>Requirement Reference:</b>	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		
<b>Objective Evidence:</b>	Sg. Tong POM, Jerangau Estate and Tayor Estate: Social Impact Assessment Action Plan Revision 2017/2018 was developed on 18/9/2017 in Mill, September 2017 for Jerangau Estate and 15/3/2017 for Tayor Estate. The plan has incorporated area of concerns, findings from SIA assessors, action plan status, remarks as well as person in charge. However, specific timeline to mitigate the negative impacts and promotion of positive impacts was not available in the action plan.		
<b>Corrective Actions:</b>	The Standardized template has been distributed to all the operating units. The SHO/ Sustainability Executive had communicated on 25/11/2017 to all the operating units that the standardized template shall be utilized		
<b>Assessment Conclusion:</b>	<p><u>Major NC close out verification:</u> The latest revision has been updated and included all positive impact. Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based onsite verification and supported with sufficient documented evidence.</p> <p><u>Verification during recertification assessment:</u> Social Action Plan 2018/2019 was developed in Sungai Tong POM on 9/8/2018, 26/9/2018 in Jaya Estate by Assistant Manager and 2/5/2018 in Pinang Emas Estate. The issue raised during the stakeholder meeting was incorporated into the action plan. The action plan has included the time frame and person in charge that responsible for the concerns. Positive impacts were identified for all the negative impacts that have been resolved previously. The implementation of corrective action was found effective.</p> <p>Thus, the implementation of the corrective action found to be effective.</p>		

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<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1532946-201709-M7	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.12.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	27/11/2017
<b>Statement of Nonconformity:</b>	No evidence to show that no forms of forced or trafficked labour are used		
<b>Requirement Reference:</b>	There shall be evidence that no forms of forced or trafficked labour are used.		
<b>Objective Evidence:</b>	<p>Interviewed with the foreign workers sampled below found that they are not allowed to take their passport whenever they intended to leave the estates during off day or annual leave. Photocopied of passport and letter of travelling issued by the management were only given to the workers. Besides, the workers did not know what the purpose of keeping passport by the employers even though they have signed on the consent letters dated 1/2/2017 in Tayor Estate and employment contracts for the safe keeping of passport by the management. Sampled of workers as below:</p> <ul style="list-style-type: none"> <li>a. Employee No.: JR1102968 (Jerangau Estate)</li> <li>b. Employee No.: JR1202992 (Jerangau Estate)</li> <li>c. Employee No.: JR1102972 (Jerangau Estate)</li> <li>d. Employee No.: TY1100616 (Tayor Estate)</li> <li>e. Employee No.: TY1100418 (Tayor Estate)</li> <li>f. Employee No.: TY1100567 (Tayor Estate)</li> </ul>		
<b>Corrective Actions:</b>	TDMP HQ has issued a memo to all operating units in making sure that every management team is required to explain and ensure that all foreign workers understood the safekeeping reason of their passport		
<b>Assessment Conclusion:</b>	<p><u>Major NC close out verification</u> During the major NC onsite close out on 27/11/2017, interview was conducted with foreign workers to confirm about their understanding on the passport safekeeping. The assessment team had confirmed that the sampled workers had voluntarily surrender their passport to TDMP. The assessment team had interviewed the operating units' management team to confirmed that the corrective action to ensure all new foreign workers is to be briefed in detail on the reason of passport keeping is being implemented. The management team is able to inform the assessment team about the item to be briefed and the documentation/records required to conform with the TDMP HQ memo. At the time of the onsite closure, there were no new foreign workers identified.</p> <p><u>Verification during recertification assessment:</u></p> <p>Interviewed with the foreign workers confirmed that they are allowed to hold their passport by themselves or surrendered to the management for safe keeping. Seen the consent letter for the workers who surrendered the passport to management as well as the Declaration of Understanding to Hold Passport themselves. Sampled of the consent letter for the new workers as below:</p> <ul style="list-style-type: none"> <li>a. Passport No.: AU 206932</li> <li>b. Passport No.: AU 208502</li> </ul> <p>Sampled of Declaration of Understanding to Hold Passport themselves as below:</p> <ul style="list-style-type: none"> <li>a. Passport No.: BH 0911641</li> <li>b. Passport No.: BK 0902702</li> </ul>		

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	<p>c. Passport No.: BQ 0573800  d. Passport No.: BR 0271004</p> <p>Interviewed with the foreign workers confirmed that they have freedom to go out from the compound during off day.  The implementation of corrective action was found effective.</p> <p>Thus, the major non-conformance remained closed.</p>
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Non-Conformity			
<b>NCR Ref #</b>	1532946-201709-M8	<b>Clause &amp; Category (Major / Minor)</b>	RSPO SCCS E2.2 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	27/11/2017
<b>Statement of Nonconformity:</b>	The organization has yet to make shipping announcement and confirmations on the RSPO IT platform for the completed shipment.		
<b>Requirement Reference:</b>	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).		
<b>Objective Evidence:</b>	Transactions for the Contract No. PO 170605, PO 170706 and PO 170811 has yet to be announced and confirmed in the Palm Trace system.		
<b>Corrective Actions:</b>	Daily monitoring for every transaction either for PK and CPO.		
<b>Assessment Conclusion:</b>	<p><u>Major NC close out verification</u>  Daily monitoring for every transaction for PK and CPO were verified. Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence.</p> <p><u>Verification during recertification assessment:</u>  The shipping announcements were done accordingly by the management. The implementation of corrective action was found effective.</p> <p>Thus, the major non-conformance remained closed.</p>		

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Non-Conformity			
<b>NCR Ref #</b>	1532946-201709-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 1.1.1 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/10/2018
<b>Statement of Nonconformity:</b>	There is no SOP for describing the process for accessing of information.		
<b>Requirement Reference:</b>	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.		
<b>Objective Evidence:</b>	No SOP is available in describing the process for accessing of information in POM, Jerangau and Tayor Estate.		
<b>Corrective Actions:</b>	Continous upgrading and improving the existing Standard Communication Flowchart suitable with the current situation and issues.		
<b>Assessment Conclusion:</b>	<p><u>Verification during recertification audit:</u>            Communication Flowchart with Mill/ Estate Management was developed where it has clearly described the process of request of information/ report. Timeline to respond and solve is within 28 working days. The company has implemented Request and Response Form for the stakeholders. The implementation of corrective action was found effective.</p> <p>Thus, the minor non-conformance was closed.</p>		

Non-Conformity			
<b>NCR Ref #</b>	1532946-201709-N2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.1.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/10/2018
<b>Statement of Nonconformity:</b>	Internal audit for legal compliance was not conducted annually and documented		
<b>Requirement Reference:</b>	A mechanism for ensuring compliance shall be implemented.		
<b>Objective Evidence:</b>	There were no records of internal audit conducted to ensure all Operating units are in compliance with the relevant legal requirements applicable to the operation.		
<b>Corrective Actions:</b>	The Internal Sustainability Audit plan was developed to ensure the internal audit is conducted at least annually at all operation units to make sure their compliance with the certification requirements are monitored.		
<b>Assessment Conclusion:</b>	The minor NC raised previous assessment was escalated to Major NC during this assessment.		

Non-Conformity			
<b>NCR Ref #</b>	1532946-201709-N3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.1.2 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/10/2018
<b>Statement of Nonconformity:</b>	Management plan is not available.		
<b>Requirement Reference:</b>	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.		
<b>Objective Evidence:</b>	All the management plans (for POM, Jerangau and Tayor) had not considered all the impact that were identified in the Aspect & Impact Evaluation. Furthermore, the current management plan did not include responsible person, timetable and mitigation measures.		
<b>Corrective Actions:</b>	Revised management plan has included all the high impact that was identified in the Aspect & Impact Evaluation (AIE) and will be ready to be inspected for the next audit.		
<b>Assessment Conclusion:</b>	<p><u>Verification during recertification audit:</u>            The mill and estate has established Environmental Impact Evaluation. All activities with significant impacts were identified and management plan was established. Sighted the Environmental Management Plan for the EIE with mitigation measures, Person responsible and time frame. The implementation of corrective action was found effective.</p> <p>Thus, the minor non-conformance was closed.</p>		

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Non-Conformity			
<b>NCR Ref #</b>	1532946-201709-N4	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.1.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/10/2018
<b>Statement of Nonconformity:</b>	The monitoring is not available		
<b>Requirement Reference:</b>	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts		
<b>Objective Evidence:</b>	The monitoring plan provided in POM, Jerangau and Tayor had not considered all the impacts identified in the Aspect & Impact Evaluation.		
<b>Corrective Actions:</b>	New monitoring plan had included all the high impact that was identified in the Aspect & Impact Evaluation (AIE).		
<b>Assessment Conclusion:</b>	<p><u>Verification during recertification audit:</u>            The mill and estate has established Environmental Impact Evaluation. All activities with significant impacts were identified and management plan was established. Sighted the Environmental Management Plan for the EIE with mitigation measures, Person responsible and time frame. The implementation of corrective action was found effective.</p> <p>Thus, the minor non-conformance was closed.</p>		

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<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1532946-201709-N5	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/10/2018
<b>Statement of Nonconformity:</b>	Adequate and appropriate protective equipment was not made available to the workers at workplace to cover all potentially hazardous operations.		
<b>Requirement Reference:</b>	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.		
<b>Objective Evidence:</b>	Jerangau Estate: 1. Hand gloves was not provided to loose fruit collector 2. PPE was not provided appropriately to workers especially harvester and manuring gang since they need to buy on their own. Tayor Estate: 1. PPE was not provided appropriately to workers especially harvester and l/f collector gang since they need to buy on their own.		
<b>Corrective Actions:</b>	Daily PPE checking will be conducted before start working. When a PPE is found damaged and need to be replaced, the management will take the old PPE for disposal and provide a new one for the worker.  The training will be continued and improve from time to time to ensure all workers are aware and realize the importance of safety and health to them.		
<b>Assessment Conclusion:</b>	<u>Verification during recertification audit:</u> Suitable PPE has been provided to the workers. During the site visit, the PPE were adequately implemented. Eg: Sterilizer Station, Press Station, Kernel Station, harvesting and spraying. The implementation of corrective action was found effective.  Thus, the minor non-conformance was closed.		



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<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1532946-201709-N6	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.5 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/10/2018
<b>Statement of Nonconformity:</b>	The emergency procedure is not implemented effectively		
<b>Requirement Reference:</b>	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed		
<b>Objective Evidence:</b>	Sg Tong POM: - Ramp (yellow iodine expired on July 17) - CS station (yellow iodine expired on May 17 and antiseptic cream was not available) - Boiler (antiseptic cream expired on March 17) Jerangau Estate: - Harvesting (Eye Mo was not available) - Creche (Antiseptic cream was not available)		
<b>Corrective Actions:</b>	Monthly First Aid Kit records and checking must be conducted by Estate Health Assistant (HA) or First Aider especially their expiry date to make sure they are ready to be used in a case of an emergency.		
<b>Assessment Conclusion:</b>	<u>Verification during recertification audit:</u> During site visit, it was found that all the items in the first aid box still valid. All the items listed were available in the first aid box. The implementation of corrective action was found effective.  Thus, the minor non-conformance was closed.		

Non-Conformity			
<b>NCR Ref #</b>	1532946-201709-N7	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/10/2018
<b>Statement of Nonconformity:</b>	The condition of the housing area was not satisfied		
<b>Requirement Reference:</b>	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible		
<b>Objective Evidence:</b>	<p>Jerangau Estate: During linesite visit found that the perimeter drain behind House No. 16 and 18 was stagnant with water that caused the water could not properly flow. In addition, spraying at the linesite was sighted at House No. 16.</p> <p>Taylor Estate: Linesite inspection was carried out by Assistant on weekly basis. The inspection was covered the cleanliness and condition of the housing area and any burning sign noted. The last inspection was conducted on 17-23/9/2017. In the inspection record mentioned that rubbish was scattered behind the houses. Briefing to the workers was conducted during morning roll-call. However, linesite visit during audit found that the rubbish was not properly disposed where it scattered under the wooden houses and behind the houses</p>		
<b>Corrective Actions:</b>	The linesite inspection is conducted weekly by Field Assistant (FA) and monitored by Assistant Manager. Linesite inspection will zoom more to rubbish behind the house. The housing inspection checklist has been revised to include the checking on cleanliness at the house backyard and spraying.		
<b>Assessment Conclusion:</b>	<p><u>Verification during recertification audit:</u>            During linesite visit to the workers' quarters found that the cleanliness at the compound was satisfactory. Gotong-royong and linesite inspections were carried out by Hospital Assistant on weekly basis to ensure the cleanliness is maintained. The implementation of corrective action was found effective.</p> <p>Thus, the minor non-conformance was closed.</p>		

Opportunity for Improvement	
OFI#	Description
OFI 1	

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1532946-201709-M1	2.1.1	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M2	2.2.1	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M3	5.1.1	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M4	4.6.12	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M5	4.7.2	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M6	6.1.3	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M7	6.12.1	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M8	SC E2.2	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-N1	1.1.1	Minor	28/09/2017	Closed out on 04/10/2018
1532946-201709-N2	2.1.3	Minor	28/09/2017	Closed out on 04/10/2018
1532946-201709-N3	5.1.2	Minor	28/09/2017	Closed out on 04/10/2018
1532946-201709-N4	5.1.3	Minor	28/09/2017	Closed out on 04/10/2018
1532946-201709-N5	4.7.3	Minor	28/09/2017	Closed out on 04/10/2018
1532946-201709-N6	4.7.5	Minor	28/09/2017	Closed out on 04/10/2018
1532946-201709-N7	6.5.3	Minor	28/09/2017	Closed out on 04/10/2018
1687913-201808-M1	2.1.3	Major	04/10/2018	Closed out on 25/11/2018
1687913-201808-M2	SCCS 5.3.2	Major	04/10/2018	Closed out on 25/11/2018
1687913-201808-N1	6.10.4	Minor	04/10/2018	"Open"

### 3.5. Stakeholders 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 Sungai Tong Palm Oil Mill 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	
<b>Internal Stakeholders</b>  Gender Committee Mill Operators Sprayer Harvester Workers’ representatives	<b>Union/Contractors/Local Communities</b>  Contractor Representative from neighbouring village
<b>Government Departments</b>  School representative	<b>NGO</b>  No complaint by NGO for Sg Tong CU. Stakeholder Consultation Invitation was sent on 29/9/2018

IS #	Description
1	<b>Feedbacks:</b> Contractor – He informed that they have good relationship with the management. Payment was made promptly and according to the signed agreement.
	<b>Management Responses:</b> The management will ensure the payment make according to the agreed contract terms.
	<b>Audit Team Findings:</b> Verified the payment voucher and confirmed that the payment was made promptly.
2	<b>Feedbacks:</b> Neighbouring village – He informed that no land encroachment by the company as to date. Trenches, poles and boundary stones were available to demarcate the boundary of the land. Safety issues were well maintained.
	<b>Management Responses:</b> The management will maintain the boundaries to avoid any land conflict.
	<b>Audit Team Findings:</b> No other issue.
	<b>Feedbacks:</b>

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<p><b>3</b></p>	<p>Workers’ Representatives (different nationalities) – The workers have informed that their wages were according to Minimum Wage Order 2016. No discrimination was occurred and they were treated equally does not matter the gender and nationalities. They were provided with free housing and medical facilities. The foreign workers informed that they are allowed to hold their passport if they want to.</p> <p><b>Management Responses:</b> The management will ensure compliance to legal requirements is maintained.</p> <p><b>Audit Team Findings:</b> No other issue.</p>
<p><b>4</b></p>	<p><b>Feedbacks:</b> Gender Committee Representatives – There was no sexual harassment nor violence case reported so far. They are aware of the procedure to lodge complaint if there is any.</p> <p><b>Management Responses:</b> The management will continue to monitor if there is any issue.</p> <p><b>Audit Team Findings:</b> No other issue.</p>
<p><b>5</b></p>	<p><b>Feedbacks:</b> Schools’ Representative – The representatives have informed that they have good relationship with the managements. The managements have provided assistance and contribution such as provided transportation to send the students for any events out of the school compound.</p> <p><b>Management Responses:</b> The management will continue to maintain good relationship and provided assistance whenever possible.</p> <p><b>Audit Team Findings:</b> No other issue.</p>

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<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Sungai Tong Palm Oil Mill has complied with the RSPO P&amp;C MY-NI 2014 &amp; RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Sungai Tong Palm Oil Mill is approved and continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Mohd Hafiz Mat Hussain	<b>Name:</b> Hj Hassan Bin Osman
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> TDM Plantation Sdn Bhd, Sg Tong POM
<b>Title:</b> Lead Auditor	<b>Title:</b> Mill Manager
<b>Signature:</b> 	<p><b>Signature:</b></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>  <b>HAJI HASSAN BIN OSMAN</b> Pengurus Kilang Kelapa Sawit Sungai Tong 21500 Setiu, Terengganu
<b>Date:</b> 25/11/2018	<b>Date:</b> 25/11/2018

**Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1:</b> Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Communication Flowchart with Mill/ Estate Management was developed where it has clearly described the process of request of information/ report. Timeline to respond and solve is within 28 working days. The company has implemented Request and Response Form for the stakeholders.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	The company has implemented Form for records of Communication with Stakeholders to record all the requests from the stakeholders. Seen the requests from stakeholders such as below: <ul style="list-style-type: none"> <li>a. Neighboring school has requested van transportation for UPSR program and Jaya Estate’s management has approved and provided the transport.</li> <li>b. Local Community has requested for donation for the Hari Raya celebration from Pinang Emas Estate.</li> </ul> DOSH and VMO have visited to the mill and estates by recorded in the visit book which was sighted at all sites. The request for information are handle adequately. Any information requested will be handled by the clerks and estate/mill manager. The response of the request will be immediately.	Complied
<b>Criterion 1.2:</b> Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

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Criterion / Indicator		Assessment Findings	Compliance
1.2.1	Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans (Criterion 8.1);</li> <li>• Public summary of certification assessment report;</li> <li>• Human Rights Policy (Criterion 6.13).</li> </ul> - Major compliance –	All documents are available at the operating sites and head office. There is no restriction reported by the stakeholders regarding obtaining of information or documents. The access of any relevant documentation is made available upon request. Procedure for communication which includes the information request is available at notice boards of the estates and mill. The company polices is made available at notice boards of the estates and mill vicinity.	Complied
<b>Criteria 1.3:</b> Growers and millers commit to ethical conduct in all business operations and transactions.			
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	TDM Plantation Sdn Bhd has developed Code of Ethical Conduct Policy dated 1/8/2017 which signed by CEO. The policy has stated that the company will operating with ethic and will not receive any bribe, gifts and etc. The policy was displayed on the notice board outside the office. Briefing of the policies were provided to the external stakeholders on 30/7/2018 during stakeholder meeting and workers on 1/8/2018 in Sungai Tong POM.	Complied
<b>Principle 2: Compliance with applicable laws and regulations</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			



<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available.          - Major compliance -</p>	<p>Sungai Tong POM has obtained approval from Pejabat Tenaga Kerja Besut/ Setiu regarding the deduction of wages which cannot exceeded 50% from the monthly wages. Seen the approval letter with Ref. No.: PTK/ST/600.2.2 (32) dated 23/1/2013 was maintained.</p> <p>TDM Sg Tong Certification Unit continued to implement its compliance with legal requirements. Among the evidence of compliance verified were:</p> <ul style="list-style-type: none"> <li>• DOE’s License No. 004064 for Sg Tong POM, validity 1/7/2018 to 30/6/2019</li> <li>• Energy commission licence for Sg Tong: 2018/00212, validity 19/1/18 to 18/1/19.</li> <li>• Diesel permit: T012518, validity 4/6/17 to 3/6/18 (Bless system stated processing, the renewal by the mill was done in May 2018)</li> <li>• Jaya Estate: TDM Plantation Sdn Bhd – CF air receiver - #TG PMT 5172, valid until 18/12/19</li> <li>• Jaya Estate: MPOB License #501497502000 – valid until 31/3/2019</li> <li>• Diesel permit: T012519, validity 4/6/17 to 3/6/18 (Bless system stated processing, the renewal by the mill was done in 24 May 2018)</li> <li>• Pinang Emas Estate: MPOB License #502606002000 – 3510.19 Ha, validity 1/3/18 – 28/2/18.</li> <li>• Pinang Emas Estate: Certificate of permit for air receiver - #TG PMT 4819, valid until 2/3/2019.</li> <li>• Diesel permit: T011914, validity 13/9/2018 to 12/9/2019.</li> </ul> <p>Jaya Estate has obtained approval from Jabatan Tenaga Kerja Negeri Terengganu for the deduction of wages for electricity and water bill, NUPW subscription fee, Sungai Tong Estate Operation fee and store.</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>The approval Ref. No. JTK/(T) 600.2.2.4 (6) dated 20/7/2017 was sighted.</p> <p>Pinang Emas Estate has obtained permit for deduction of wages from workers from Jabatan Tenaga Kerja Semenanjung Malaysia for the levy fees and permit with Serial No.: PP3/22/0046 dated 14/6/2005 was sighted. Besides, permit for deduction of water and electricity was obtained as well. Permit with Serial No.: PP3/22/0051 dated 24/11/2005 was sighted.</p>	
2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>- Minor compliance -</p>	<p>List of applicable laws registered in a document called "Mill/Estate Legal Requirement" and 2018 version was available. Among the Acts and their sub-regulations available were OSHA, FMA, Pesticide Act, Electrical Supply Act, Petroleum (Safety Measure) Act, EQA, Code of Practice for Safe Working in a Confined Space, Local Government Act, Employment Act.</p>	Complied

<p>2.1.3</p>	<p>A mechanism for ensuring compliance shall be implemented. - Minor compliance -</p>	<p>The mechanism for ensuring compliance for both mill and estates was done through evaluation of compliance. The status of compliance was reported in the legal register itself. Based on the report, all requirements were complied with. Sg Tong POM- Evaluation was done on 1/3/2018 Jaya Estate – Evaluation was done on 10/1/2018 Pinang Emas Estate – Evaluation was done on 2/5/2018</p> <p>Internal Audit for Sg Tong complex was plan to be conducted start from June 18 – October 18.</p> <ol style="list-style-type: none"> <li>1. Sg Tong POM – Internal Audit was done 18/9/2018. All the findings were closed accordingly.</li> <li>2. Pinang Emas Estate – Internal audit was done on 26/6/2018. All the findings were closed accordingly.</li> <li>3. Jaya Estate plan to be conducted on 10/10/2018</li> </ol> <p>Verified the Check Roll Logbook found that sampled workers below have worked more than 130 hours and interviewed with the workers confirmed that the monitoring system of overtime has captured the 2 to 4 hours’ rest time in Sungai Tong POM. The workers did not thumb out even they were away from work station for break. Sampled of workers as below:</p> <table border="1" data-bbox="1025 1072 1839 1375"> <thead> <tr> <th>Employee ID</th> <th>Month</th> <th>Total Hours</th> </tr> </thead> <tbody> <tr> <td rowspan="3">SM 00084</td> <td>November 2017</td> <td>150</td> </tr> <tr> <td>December 2017</td> <td>131</td> </tr> <tr> <td>January 2018</td> <td>139</td> </tr> <tr> <td rowspan="2">SM 00062</td> <td>November 2017</td> <td>148</td> </tr> <tr> <td>January 2018</td> <td>136</td> </tr> <tr> <td rowspan="2">SM 00085</td> <td>November 2017</td> <td>142</td> </tr> <tr> <td>December 2017</td> <td>138</td> </tr> <tr> <td>SM 0900197</td> <td>January 2018</td> <td>136</td> </tr> </tbody> </table>	Employee ID	Month	Total Hours	SM 00084	November 2017	150	December 2017	131	January 2018	139	SM 00062	November 2017	148	January 2018	136	SM 00085	November 2017	142	December 2017	138	SM 0900197	January 2018	136	<p>Major nonconformance</p>
Employee ID	Month	Total Hours																								
SM 00084	November 2017	150																								
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SM 0900197	January 2018	136																								

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Criterion / Indicator		Assessment Findings			Compliance
			February 2018	133	
			August 2018	147	
		SM 0900219	January 2018	136	
			April 2018	136	
			July 2018	136	
			August 2018	136	
		SM 0900167	November 2017	154	
			December 2017	136	
		Thus, the minor NC raised previous assessment was escalated to Major NC during this assessment.			
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Changes in law can be detected by both plantation and HQ levels. Either one detected the change, communication about the change must be made to each other. (ref.: " <i>Prosedur Undang-undang dan Lain-lain Keperluan</i> "). Ever since the last assessment, there has been no change of the applicable legal requirements.			Complied
<b>Criterion 2.2:</b> 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.					

Criterion / Indicator	Assessment Findings	Compliance
2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	<p>Land title for Sg Tong POM was kept by Fikri Estate. However, all the documents copy available at Sg Tong POM. Sighted the land title 6521 (lot 7663), management agreement between Kumpulan Ladang-Ladang Terengganu Sdn Bhd and TDM Plantation Sdn Bhd dated 20/7/2016, management agreement between TDM Plantation Sdn Bhd and TDM Berhad dated 20/7/2016.</p> <p>The land was leased from Perbadanan Memajukan Iktisad Negeri Terengganu. The Lease Agreement between Perbadanan Memajukan Iktisad Negeri Terengganu and Kumpulan Ladang-Ladang Terengganu Sdn Bhd, management agreement between Kumpulan Ladang-Ladang Terengganu Sdn Bhd and TDM Plantation Sdn Bhd dated 20/7/2016, management agreement between TDM Plantation Sdn Bhd and TDM Berhad dated 20/7/2016 were sighted. The leasing period until 31/12/2071. The land titles for Jaya Estate and Pinang Emas Estate were sighted:</p> <ol style="list-style-type: none"> <li>1. Grant No: 6001, Lot No: 6558 (Jaya Estate)</li> <li>2. Grant No: 6247, Lot No: 6743 (Jaya Estate)</li> <li>3. Grant No: 12885, Lot No: 7250 (Jaya Estate)</li> <li>4. Grant No: HS(D) 74, PT No: PT1140</li> <li>5. Grant No: HS(D) 73, PT No: PT141</li> <li>6. Grant No: HS(D) 75, PT No: PT1143</li> <li>7. Grant No: HS(D) 76, PT No: PT1144</li> <li>8. Grant No: HS(D) 77, PT No: PT1145</li> <li>9. Grant No: 14644, Lot No: Lot3999</li> </ol>	<p>Complied</p>
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	<p>The boundaries were clearly marked at field 2000C2/C3 with small holder (Kg Jelapan). The management used pole painting with red, blue and white as boundaries marking.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	Complied
<b>Criterion 2.3:</b> Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.		

Criterion / Indicator		Assessment Findings	Compliance
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	There were no land disputes identified during the time of audit. There was no customary land was identified.	Complied
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	There were no land disputes identified during the time of audit. There was no customary land was identified.	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There were no land disputes identified during the time of audit. There was no customary land was identified.	Complied

Criterion / Indicator		Assessment Findings	Compliance
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There were no land disputes identified during the time of audit. There was no customary land was identified.	Complied
<b>Principle 3: Commitment to long-term economic and financial viability</b>			
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.			



Criterion / Indicator	Assessment Findings	Compliance
<p>3.1.1</p> <p>A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders.</p> <p>- Major compliance -</p>	<p>Annual business plan and 5 years for 2019 – 2023 projection was established and document was available for review. The plan was established as basis for the company and operating units to conduct the business. The business plan covers:</p> <ul style="list-style-type: none"> <li>i. FFB production, CPO, OER, and KER, general charges, mill maintenance, process shift labour, general services, and total processing cost.</li> <li>ii. Hectarage statement, FFB yield per Ha, CPO yield per Ha, PK yield per Ha, Mature area expenditures, Immature area expenditures, Capital Expenditures including crop projection for 2018, Cost of production/mt, and gross P&amp;L.</li> </ul> <p>It also covers environment, social (workers and staffs welfare), and health and safety component.</p> <p><u>STPOM</u></p> <p>Noted the new CAPEX budgeted in the 2018 business plan as follows:</p> <ul style="list-style-type: none"> <li>i. Quarters for workers and staff</li> <li>ii. Upgrading executives house</li> <li>iii. Replacing old furniture</li> <li>iv. Mill main water pipeline</li> <li>v. Digester c/w Gearbox (5000 L)</li> </ul> <p><u>Jaya Estate</u></p> <p>Noted the new CAPEX budgeted in the 2018 business plan as follows:</p> <ul style="list-style-type: none"> <li>i. Quarters for workers and staff</li> <li>ii. Fertiliser store</li> <li>iii. Replacing Scissor Lift</li> <li>iv. FFB loading Bin</li> </ul>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	The estates visited has established 5 years replanting programme. The replanting programme was planned for tall palm and older than 25 years old as well as low production field.  Replanting programme as follow:  <u>Jaya Estate</u> 2020 : 115.30 ha for field 1995 2021 : 119.11 ha for field 1995	Complied
<b>Principle 4: Use of appropriate best practices by growers and millers</b>			
<b>Criterion 4.1:</b> Operating procedures are appropriately documented, consistently implemented and monitored.			

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Criterion / Indicator		Assessment Findings	Compliance
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	<p>SOP has been established for the Palm Oil Mill and the Estates as a guidance for the operating units to conduct daily operations</p> <p>STPOM holds two SOPs as follows:</p> <ul style="list-style-type: none"> <li>i. Mill Standard Operating Procedure and Operation Manuals, TDM/STPOM/01 rev. 01/2011 issued on 11 May 2011 which covers mill operations by stations i.e Reception station, sterilization station, kernel recovery, water treatment plant, Laboratory, product quality and HIRARC. The latest reviewed was conducted on Nov 2012 and no changes was made.</li> <li>ii. Sustainability Standard Operating Procedure which covers sustainability management procedure i.e Water sampling, flood management, OSH committee, complaint, communication and handling of scheduled waste.</li> </ul> <p>Estates holds SOP as references to run the operation and documented in TDM Plantation Sdn. Bhd. Standard Operating Procedure. Latest review was conducted on May 2017. The SOP covers all main and support operations i.e Boundary marking, Replanting, Soil Conservation, Water management, Manuring, Weeding, Harvesting, Clinic, handling of Domestic and Scheduled Waste.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	The management has appointed external parties, Sime Darby Seeds and Agricultural Services to provide External Mill Advisor and External Plantation Advisor to inspect and report on mill and estates implementation of procedures. The visit was conducted on annually basis.  The Mill Advisor/Plantation Advisor report covers on crop quality, Mill and processing, Manpower deployment, production performance, Quality of Input FFB, Quality of Palm Products, Process efficiency, Palm products storage and dispatch and Production Cost.  Agronomist visited the estate on monthly basis to conduct Quality Control Audit. The reports covers on Field grading summary, loose fruit collection and crop recovery.	Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	Latest mill advisor report was conducted on 11-12/6/2018 by engineer from SDSAS Sdn. Bhd. No major issue raised during the visit. The report was yet to receive by the mill. The mill maintain the reports of Mill Advisor visit for future references. Sighted the report from 2015, 2016 and 2017 available for review.  <u>Jaya Estate</u> Latest Plantation Advisor visit was conducted on 22-24/4/2017 by from SDSAS Sdn. Bhd. No major issue raised regarding the visit. The mill maintain the visit report for the past three years for references. Sighted the report for Agronomist visit for the month June, July and August.	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	STPOM maintain the daily records of all third party FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details.	Complied
<b>Criterion 4.2:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			

Criterion / Indicator		Assessment Findings	Compliance
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield	Complied
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	Fertilizer application program is based on the recommendation by Agronomist and documented in Fertilizer Recommendation FY 2018. Observed the recommendation and implementation record for FY 2018:  Observed application records as per agronomist recommendation:  <u>Jaya Estate</u> Month program: May 18 Field: P04B2 and P04C1 Type: AC-NK 2 Rate/palm: 1.75 kg/palm Month applied: Jun-July 18  <u>Pinang Emas Estate</u> Month program: May 18 Field: P94A1 and P96A1 Type: AC-NK 2 Rate/palm: 1.75 kg/palm Month applied: May-July 18	Complied

Criterion / Indicator		Assessment Findings	Compliance												
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>The agronomist prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation</p> <p><u>Jaya Estate</u> Agronomist and Advisory Department conducted the leaf sampling and soil sampling analysis. Latest leaf sampling was conducted on 19/4/2018. The leaf nutrient level report was documented in report no. TDMP/AAD/02/04.2018_LIY Latest soil sampling was done on 19/04/2018. Refer report no. TDMP/AAD/02/04.2018_LIY</p> <p><u>Pinang Emas Estate</u> The estate appointed external parties, UTCL Laboratory to conduct the leaf sampling. Latest leaf sampling was conducted on 3/8/2017. Refer report no LE/1708/1148 – LE/1708/1157. For soil analysis, the estate has appointed Applied Agricultural Resource Sdn. Bhd. to conduct the soil analysis. Latest analysis was done on 13/12/2017 and the report was available for review.</p>	Complied												
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	<p><u>STPOM</u> All palm by-products including fronds, EFB, shell and fibre were recycled. The compost fertiliser which is process from EFB is applied at the rate of 10kg/palm. Sighted the records for dispatch of EFB and compost by Sg Tong POM:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>EFB – Field Application</th> <th>Biocompost Plant</th> </tr> </thead> <tbody> <tr> <td>July 18</td> <td>123.59</td> <td>1641.93</td> </tr> <tr> <td>August 18</td> <td>111.71</td> <td>1484.13</td> </tr> <tr> <td>September 19</td> <td>146.19</td> <td>1942.23</td> </tr> </tbody> </table>	Month	EFB – Field Application	Biocompost Plant	July 18	123.59	1641.93	August 18	111.71	1484.13	September 19	146.19	1942.23	Complied
Month	EFB – Field Application	Biocompost Plant													
July 18	123.59	1641.93													
August 18	111.71	1484.13													
September 19	146.19	1942.23													

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.3:</b> Practices minimise and control erosion and degradation of soils.			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Estates visited has established soil map for the estate. No fragile soil identified at the estates visited.  <u>Jaya Estate</u> No fragile soil identified at the estate. Main soil series in the estate Alma, Bungor, Beserah, Rengam, Tai Tak, Tepus, Gondang, Gali and Kerayong	Complied
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	TDMP has established SOP for plantings on slope. Contour terraces will be constructed for slopes of 10 -25 degree to conserve soil and moisture documented in TDM Plantation Sdn. Bhd. Standard Operating Procedure section A4: Replanting oil palm to oil palm.	Complied
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Road maintenance program for Jaya Estate and Pinang Emas Estate was established to include road grading and resurfacing with crusher run.	Complied
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	No fragile soil identified at the estates visited.	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	No fragile soil identified at the estates visited.	Complied

<b>Criterion / Indicator</b>		<b>Assessment Findings</b>	<b>Compliance</b>
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	No fragile soil identified at the estates visited.	Complied
<b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.			



<p>4.4.1</p>	<p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>STPOM Water management plant has been established and documented. Latest reviewed was conducted on 5/3/2018. The plan identified the issues of concern, mitigation plan, resource, person responsible and time plan. The management plan focusing on issues during shortage of water supply / dry spell source and water pollution.</p> <p>Mill also established the reduction of water usage management plan and has been reviewed on 5/8/2018. The plan identified the issues of concern, mitigation plan, resource, person responsible and time plan. The management plan has identified issues of concern as follows:</p> <ul style="list-style-type: none"> <li>i. Rainwater collection</li> <li>ii. Air conditioner water collection</li> <li>iii. Steam turbine – excess of water discharge</li> <li>iv. Replace and repair main water pipeline</li> <li>v. Separator using too much water</li> </ul> <p>Sighted the completed implementation of the management plan as follows:</p> <ul style="list-style-type: none"> <li>i. Repair and replacement of main pipeline at linesite area are in progress. Sighted the payment voucher for completed work. Refer voucher no. PC 097/18, PC 112/18 and PC 123/18</li> <li>ii. To reduce water usage at separator, the mill install three phase decanter. Sighted the purchase order for installing and commissioning three decanter no 1802003</li> </ul> <p>Estate visited has established water management plan reviewed annually. Latest reviewed for water management plan conducted on 25/9/2018 (Jaya Estate) .The management plan focusing issue on shortage of water supply / dry spell source and water pollution. The plan includes the action plan to be taken, resource, person responsible and time plan.</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>Sighted the implementation of the management plan at Pinang Emas Estate. Monitoring of river water quality for Sg. Bakar and Sg. Petah. Pesticides Water Analysis conducted annually by third party laboratory, Eralab (KT) Sdn. Bhd. Sighted the latest result of Pesticides Water Analysis no. 18/07/W0598 Result of the analysis shows conformation with Class IIA/IIB.</p>	

Criterion / Indicator	Assessment Findings	Compliance												
<p>4.4.2</p> <p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.</p> <p>- Major compliance -</p>	<p><u>Jaya Estate</u>  TDM Plantation Sdn. Bhd. has established policy for protection of water course and wetlands and documented in Slope Protection &amp; River Buffer Zone Policy. The policy was displayed on notice board and communicated to all the workers. The river buffer zone established as follows:</p> <table border="1" data-bbox="1025 587 1821 791"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p><u>Jaya Estate</u>  Sighted no river across the estate. The estate has established buffer for main drain across the estate and demarcated using red colour pole. Vegetation along the buffer zone are maintained and no chemical application sighted along the buffer zone. Interview with sprayers shows the understanding on no spraying allowed along watercourse.</p> <p><u>Pinang Emas Estate</u>  Sighted the all palm adjacent to the river was marked with red colour for buffer zone. Vegetation along the buffer zone are maintained and no chemical application sighted along the buffer zone.</p>	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters	<p>Complied</p>
River width	Buffer zone													
> 40 meters	50 meters													
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4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	In STPOM, effluent Analysis conducted by third party and submitted the quarterly return form to DOE every 3 months through OER (Online Environmental Report in the). Noted the following report in the Flemington POM:- i. Report no: 18/04/W0344 BOD: 38 mg/L Suspended Solid: 44 mg/L ii. Report no: 18/05/W0414 BOD: 37 mg/L Suspended Solid: 86 mg/L iii. Report no: 18/06/W0453 BOD: 34 mg/L Suspended Solid: 30 mg/L All the parameters have conform to parameters limit for watercourse discharge	Complied
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	The mill water source from the supply of government- Syarikat Air Terengganu (SATU). In POM, the water usage monitoring for FFB/tonne: a. May 2018 – 2.56 m3/ FFB (mt) b. Jun 2018 – 2.63 m3/ FFB (mt) c. Jul 2018 – 2.64 m3/ FFB (mt)	Complied
<b>Criterion 4.5:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored.                      - Major compliance -</p>	<p>Estates visited has established IPM Management Plan for FY 2018. The management plan has identified issued of concern, mitigation plan, person responsible and time frame.</p> <p><u>Jaya Estate</u>                      Estate has established IPM Management Plan for FY 2018. Last reviewed was conducted on 26/9/2018. The management plan identified the planting of beneficial plant as issue of concern which have positive impact to reduce the usage of chemical in controlling pest.                      Sighted the implementation of the IPM management plant as follows:</p> <ul style="list-style-type: none"> <li>i. Nursery for beneficial plant has been established. The seedlings estimated to be transplanted to the field in 2019.</li> <li>ii. Sighted during site visit the planting of beneficial plant along the road to P2000 C2 and P2000 C3. The planting of beneficial plant was completed at 3220 meter. Sighted the map of beneficial plant planting.</li> </ul> <p><u>Pinang Emas Estate</u>                      IPM management plan has been established and documented in Continual Improvement Plan. Sighted the implementation plan as follows;</p> <ul style="list-style-type: none"> <li>i. Barn owl census shows 65% occupancy rate. The estate targeted ratio of Barn owl box at 1:10 ha. Current ratio of bran owl box at 1:18ha</li> <li>ii. Sighted the planting of beneficial plant, Tunera Subulata along the main road and filed P96A2.</li> </ul>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance																		
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	IPM implementer refer has been provided with proper training. IPM training has been provided by the plantation executives to the field supervisor and mandore. Interview with the mandore and workers confirm their understanding on the benefits of barn owl and beneficial plant planting.	Complied																		
<b>Criterion 4.6:</b> Pesticides are used in ways that do not endanger health or the environment																					
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Justification of pesticides applied is available in the TDM agriculture policy. Refer to agriculture policy no 05.02 - 05.03: weed control for immature & mature oil palm. For pest and disease control, refer to 09.01 – 09.08. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species.	Complied																		
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. <table border="1" data-bbox="1025 933 1803 1136"> <thead> <tr> <th>Month</th> <th>Jaya Estate</th> <th>Pinang Emas Estate</th> </tr> </thead> <tbody> <tr> <td>Apr 18</td> <td>0.05</td> <td>0.07</td> </tr> <tr> <td>May 18</td> <td>0.01</td> <td>0.07</td> </tr> <tr> <td>Jun 18</td> <td>0.01</td> <td>0.04</td> </tr> <tr> <td>Jul 18</td> <td>0.04</td> <td>0.07</td> </tr> <tr> <td>Aug 18</td> <td>0.01</td> <td>0.09</td> </tr> </tbody> </table>	Month	Jaya Estate	Pinang Emas Estate	Apr 18	0.05	0.07	May 18	0.01	0.07	Jun 18	0.01	0.04	Jul 18	0.04	0.07	Aug 18	0.01	0.09	Complied
Month	Jaya Estate	Pinang Emas Estate																			
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4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in TDM agriculture policy 09-01 to 09-08. The implementation in the field is consistent with the TDM agriculture policy.	Complied																		

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Criterion / Indicator	Assessment Findings	Compliance
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	Complied
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Complied
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No pesticides applied aerially	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders. Employees handling pesticide given knowledge and skill required by the Compliance Department to cover safe handling practices and standard operating procedures.	Complied
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Estates and mill has identified all waste material and proper disposal for all waste has been documented in waste management plan. Schedule waste handler has been provided with training conducted centrally. Sighted the training attendance and material for Schedule waste storekeeper and clerk dated 12/8/2018.	Complied



Criterion / Indicator		Assessment Findings	Compliance																								
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<p>Annual medical surveillance for sprayers and pesticide operators were demonstrated.</p> <p>Medical examination programme established for sprayer team which conducted by Klinik Bestari Sdn Bhd (HQ/08/DOC/00/352)-Jaya Estate and Pinang Emas Estate.</p> <table border="1"> <thead> <tr> <th>ID No</th> <th>Date of Medical check up</th> <th>Result</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>JY0800257</td> <td>1/2/18</td> <td>Fit</td> <td>Jaya Estate</td> </tr> <tr> <td>JY00105</td> <td>1/2/18</td> <td>Fit</td> <td></td> </tr> <tr> <td>PC0801282</td> <td>21/5/18</td> <td>Fit</td> <td>Pinang Emas Estate</td> </tr> <tr> <td>PC0800906</td> <td>21/5/18</td> <td>Fit</td> <td></td> </tr> <tr> <td>PC0801276</td> <td>21/5/18</td> <td>Fit</td> <td></td> </tr> </tbody> </table>	ID No	Date of Medical check up	Result	Estate	JY0800257	1/2/18	Fit	Jaya Estate	JY00105	1/2/18	Fit		PC0801282	21/5/18	Fit	Pinang Emas Estate	PC0800906	21/5/18	Fit		PC0801276	21/5/18	Fit		Complied
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4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	<p>At Jaya Estate, based on interview with female sprayers confirmed knowledge of the policy of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding. All the female sprayers interviewed were not pregnant.</p> <p>At Pinang Emas Estate, there was no female sprayers.</p>	Complied																								
<p><b>Criterion 4.7:</b>            An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>																											

<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.          - Major compliance -</p>	<p>Safety and Health Policy was established where the policy was signed by CEO of TDM Plantations Sdn Bhd on 1/9/2017. OHS plan for 2018 was established to cover all activities involved in the estate and mill.</p> <p><u>CHRA</u>          CHRA was conducted at Sg Tong POM on 24/8/2014 by a competent assessor (JKKP IH 127/171-(8)) from Occumed Consultancy &amp; Services Sdn Bhd. The plan was established through the recommendation by the assessor.</p> <p>CHRA was conducted at Jaya Estate on 27/4/2014 by a competent assessor (JKKP IH 127/171-(8)) from Occumed Consultancy &amp; Services Sdn Bhd. The plan was established through the recommendation by the assessor.</p> <p><u>Medical Surveillance</u>          Medical surveillance was conducted by Klinik Ibra (HQ/08/DOC/00/272) on 10/7/2018. Based on the report, all workers were found normal (eg: ID No-02916, SM0900164, SM00070, SM00035).</p> <p><u>Chemical Exposure Monitoring</u>          The monitoring was done on 16/8/2014 by Occumed Consultancy &amp; Services Sdn Bhd. From the report, the exposure to n-hexane was below the permissible exposure limit as stipulated under USECHH Regulations 2000.</p> <p><u>Local Exhaust Ventilation Inspection</u>          LEV inspection was done on 25/3/2018 by ZABSI. From the report, the fumehood achieves acceptable performance and operating in good condition and full compliance to USECHH 2000 Regulations.</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p><u>Exhaust Fan Monthly Inspection</u>            Visual inspection by lab operator was done on monthly basis. The latest was done on 20/9/2018.</p> <p><u>Audiometric Test Report</u>            The audiometric test was last done on 2/5/2018 for 105 operators at Sg Tong POM by SI Energy Sdn Bhd. From the report, 12 out of 105 were identified with standard threshold shift. The retest was done accordingly on 14/8/18 and found 4 perfonnel were confirm to have permanent standard threshold shift and 2 personnel were confirm to have hearing impairment. The retest was done by Klinik Ibra (HQ/08/DOC/00/272). JKKP 7 was submitted to DOSH accordingly on 17/9/2018.</p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>- Major compliance -</p>	<p><b><u>Sg Tong POM</u></b>            HIRARC was established to include all the activities in the mill including construction site. HIRARC register was last reviewed on 19/9/2018 after accident happened for activity manual heavy lifting.</p> <p><b><u>Jaya Estate</u></b>            HIRARC was established to include all the activities in the estate including construction site. HIRARC register was last reviewed on 1/1/2018. The HIRARC related to the drainage &amp; irrigation, general work, harvesting, pruning &amp; raking, road &amp; bridges, security, store, transporting workers, manuring, weeding were reviewed.</p> <p><b><u>Pinang Emas Estate</u></b>            HIRARC was established to include all the activities in the estate including construction site. HIRARC register was last reviewed on 20/8/18 after the accident for pruning activity in August 2018. After revised the HIRARC, the management has conduct the training for pruning activity on 26/8/18. The HIRARC related to the drainage &amp; irrigation, general work, harvesting, pruning &amp; raking, road &amp; bridges, security, store, transporting workers, manuring, weeding were reviewed</p>	<p>Complied</p>
<p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p>	<p>Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</p> <p>Suitable PPE has been provided to the workers based on the information in the MSDS and CHRA assessor's recommendation. During the site visit, the PPE were adequately implemented. Eg: Sterilizer Station, Press Station, Kernel Station, harvesting and spraying.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.4 The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.                      - Major compliance -</p>	<p>The person in-charge for safety and health was established at mill and estate. Sighted the OHS organization chart for 2018.</p> <p><b><u>Sg Tong POM</u></b>                      OSH meeting was conducted on quarterly. OSH meeting minutes dated 25/9/18, 27/6/18, 26/3/18 and 18/12/17 were sighted.</p> <p><b><u>Jaya Estate</u></b>                      OSH meeting was conducted on quarterly. OSH meeting minutes dated 10/9/18, 12/6/18, 13/3/18 and 13/12/17 were sighted.</p> <p><b><u>Pinang Emas Estate</u></b>                      OSH meeting was conducted on quarterly. OSH meeting minutes dated 19/9/18, 12/6/18, 22/3/18 and 26/12/17 were sighted.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p> <p>Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors. Emergency response Team organization chart for 2018 available. ERT Training schedule 2018 sighted.</p> <p>Records on all accidents had been verified to be maintained satisfactorily. Quarterly review on accident cases had been carried out during quarterly meeting of Safety &amp; Health (OSH).</p> <p>Fire drill was last conducted with BOMBA on 16/7/2018 to all workers, staff and executive (STPOM) and 14/8/18 at Pinang Emas Estate.</p> <p>First aid boxes were available at worksite (sterilizer station, supervisor room and office). All the items in the first aid boxes were found not expired. First aid training was last conducted on 20/9/2018 by hospital assistant, Fikri Estate, 25/4/2018 by HA, Jaya Estate and 12/8/18 by HA, Pinang Emas Estate.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance																
4.7.6	All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<p>Medical care is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme.</p> <table border="1"> <thead> <tr> <th>Type</th> <th>Estate/Mill</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>SOCSO</td> <td>Sg Tong POM</td> <td>July 18 and August 18 (ID No: 02916, SM0900164, SM00070, SM00035)</td> </tr> <tr> <td>SOCSO</td> <td>Jaya Estate</td> <td>July 18 and August 18 (ID No: JY0800257, JY00105)</td> </tr> <tr> <td>Insurance (MW216695)</td> <td rowspan="3">Pinang Emas Estate</td> <td>1/3/18-28/2/19 (ID No: PE0800694, PE0800695)</td> </tr> <tr> <td>SOCSO</td> <td>July 18 and August 18 (ID No: PE00018, PE0800859, PE0800763)</td> </tr> <tr> <td>Insurance (MW238432)</td> <td>13/5/18-12/5/19 (ID No: PE0800726)</td> </tr> </tbody> </table>	Type	Estate/Mill	Remark	SOCSO	Sg Tong POM	July 18 and August 18 (ID No: 02916, SM0900164, SM00070, SM00035)	SOCSO	Jaya Estate	July 18 and August 18 (ID No: JY0800257, JY00105)	Insurance (MW216695)	Pinang Emas Estate	1/3/18-28/2/19 (ID No: PE0800694, PE0800695)	SOCSO	July 18 and August 18 (ID No: PE00018, PE0800859, PE0800763)	Insurance (MW238432)	13/5/18-12/5/19 (ID No: PE0800726)	Complied
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Criterion / Indicator		Assessment Findings	Compliance								
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained and based on JKPP 6, 7 &amp; 8. Sample of accident statistic as shown below :</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Sg Tong POM</th> <th>Jaya Estate</th> <th>Pinang Emas Estate</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>18</td> <td>11</td> <td>27</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days</p> <p>JKPP 6 for accident happened during pruning activity on 14/8/18 was submitted to DOSH on 15/8/18 (Pinang Emas Estate)            JKPP 8 for Sg Tong POM was submitted to DOSH on 24/1/2018.            JKPP 8 for Jaya Estate was submitted to DOSH on 17/1/2018.            JKPP 8 for Pinang Emas Estate was submitted to DOSH on 10/2/2018.</p>	Year	Sg Tong POM	Jaya Estate	Pinang Emas Estate	2017	18	11	27	Complied
Year	Sg Tong POM	Jaya Estate	Pinang Emas Estate								
2017	18	11	27								
<p><b>Criterion 4.8:</b>            All staff, workers, smallholders and contract workers are appropriately trained.</p>											
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	<p>Sg Tong POM and supply base has established an annual training program that covers all aspects of the RSPO Principles and Criteria. The training need and program was made available for verification at all visited sites.</p>	Complied								



Criterion / Indicator		Assessment Findings	Compliance																																									
4.8.2	Records of training for each employee shall be maintained. - Minor compliance -	<p>Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&amp;C requirement.</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>20/2/18</td> <td>Permit to work</td> <td rowspan="7">STPOM</td> </tr> <tr> <td>12/3/18</td> <td>Scheduled waste</td> </tr> <tr> <td>29/4/18</td> <td>Authorised entrant and standby person</td> </tr> <tr> <td>4/7/18</td> <td>Compliance to DOE license</td> </tr> <tr> <td>1/8/18</td> <td>Safety and health at workplace</td> </tr> <tr> <td>15/11/17</td> <td>Training on basic operation at mill</td> </tr> <tr> <td>14/9/17</td> <td>Grading</td> </tr> <tr> <td>12/9/17</td> <td>Chemical handling</td> <td rowspan="4">Jaya Estate</td> </tr> <tr> <td>26/8/18</td> <td>Pest and disease</td> </tr> <tr> <td>1/8/18</td> <td>Rat baiting</td> </tr> <tr> <td>18/4/18</td> <td>Training for driver</td> </tr> <tr> <td>13/2/18</td> <td>Manuring</td> <td rowspan="5">Pinang Emas Estate</td> </tr> <tr> <td>18/8/18</td> <td>Rat baiting</td> </tr> <tr> <td>15/8/18</td> <td>Manuring</td> </tr> <tr> <td>21/3/18</td> <td>Spraying</td> </tr> <tr> <td>19/3/18</td> <td>Pruning</td> </tr> <tr> <td>15/4/18</td> <td>Harvesting</td> <td></td> </tr> </tbody> </table>	Date	Training	Remark	20/2/18	Permit to work	STPOM	12/3/18	Scheduled waste	29/4/18	Authorised entrant and standby person	4/7/18	Compliance to DOE license	1/8/18	Safety and health at workplace	15/11/17	Training on basic operation at mill	14/9/17	Grading	12/9/17	Chemical handling	Jaya Estate	26/8/18	Pest and disease	1/8/18	Rat baiting	18/4/18	Training for driver	13/2/18	Manuring	Pinang Emas Estate	18/8/18	Rat baiting	15/8/18	Manuring	21/3/18	Spraying	19/3/18	Pruning	15/4/18	Harvesting		Complied
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**Principle 5: Environmental responsibility and conservation of natural resources and biodiversity**

**Criterion 5.1:**

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

Criterion / Indicator		Assessment Findings	Compliance
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	<p>TDMP has established SOP for the operating units to conduct the Environmental Impact Assessment and documented in the TDM Estate Quality Management Systems – Sub Section 5.4</p> <p><u>STPOM</u> EIA has been established and documented in Environmental Aspect and Impact Identification and Environmental Impact Evaluation. Latest review was conducted on 1/1/2018 by compliance executives and approve by the manager. The assessment covers all activities base on working station such as:</p> <ul style="list-style-type: none"> <li>i. Reception Area</li> <li>ii. Sterilizer Bay</li> <li>iii. EFB Ramp</li> <li>iv. Workshop</li> <li>v. Schedule Waste Store</li> <li>vi. Press station and etc.</li> </ul> <p><u>Jaya Estate</u> EIA has been established and documented in Environmental Aspect and Impact Identification and Environmental Impact Evaluation. Latest review was conducted on 29/9/2018 with update on FFB loading activity. Refer activity no. EAI/2018/02-01. The assessment covers all operation in the estate including support activities such as harvesting, spraying, FFB loading, building construction and field upkeep.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -	Activities with significant impacts were determined by the score in Environmental Impact Evaluation. As per SOP established all activities with significant impacts were documented in Environmental Management plan where the mitigation measures were developed. In the management plan also stated the responsible person to ensure the implementation of the plan.	Complied
5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -	The monitoring records of the Environment Improvement Plan / Pollution Prevention Plan / Continuous Improvement Plan are available. The plan was reviewed annually.	Complied
<b>Criterion 5.2:</b> The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.			
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	Information was collated in a Bio-Diversity Assessment by SRA Consultancy on 18/3/12 – 19/4/2012 (report dated May 2012) which had covered all estates under Sg Tong Complex, including the POM. HCV Toolkit for Malaysia by WWF – Malaysia was used. There were appropriate consultation processes as per the HCV Toolkit- Malaysia which covers the three main components of identification, management and monitoring. No RTE species at Jaya Estate and Pinang Emas Estate was recorded in the report.	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	Management and Monitoring plan for 2018 has been established and reviewed on 27/9/2018 at the sample estates. Among the action plans implemented were continuous education to employees and surrounding communities about bio-diversity through explanation of company's policy, meetings, signage for buffer zone, restriction of any development activity at the area which has been identified as Bio-Diversity.	Complied
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	Continuous education to the workforce was done through muster call briefing. Among the topics covered were buffer zone, HCV area and RTE species. Apart from that, signage of no hunting and pictures of RTE species were also displayed at various strategic places such as points of entry of the estates.	Complied
5.2.4	Where a management plan has been created there shall be ongoing monitoring: • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	No HCV or RTE species at except worship at Jaya Estate and Pinang Emas Estate (HCV6) and river buffer zone area at Pinang Emas Estate (HCV4). The management were put a worker everyday to clean the worship area while for river, water sampling analysis was done once a year.	Complied
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	There was no HCV set-asides with existing rights of local communities have been identified at both visited estates.	Complied
<b>Criterion 5.3:</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			

Criterion / Indicator		Assessment Findings	Compliance
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Mill and estates visited has identified all waste products and source of pollution and documented in Waste Management Plan. The waste identified has been categorized as follows: i. Scheduled Waste – Used lubricants, used hydraulic oil ii. Domestic Waste – Rubbish iii. Industrial Waste – POME, EFB, Bionic Fertilizer and Scrap Metal	Complied

<p>5.3.2</p>	<p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p>	<p>The disposal of used chemicals and containers were done accordingly as per regulation. Stores for scheduled waste were inspected at audited sites i.e. Mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have designated Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. All Scheduled Waste were collected by Pentas Flora to be disposed.</p> <p><u>STPOM</u> Mill has established monitoring method for Scheduled waste inventory. In the inventory form stated the date of SW generated, type of SW, and quantity generated. The date of SW generated also displayed at the SW store. Sighted the inventory form for SW 410, and 305 for the month of July, August and September 2018. The inventory was also send to DOE through E-SWISS. Sighted the E-SWISS 5<sup>th</sup> Scheduled form for the month of July, August And September 2018. In STPOM, schedule waste dispose through licensed contractor: Pentas Flora Kelantan. Latest consignment note dated Consignment note for schedule waste : a. 28 /8/2018 for SW 305; C/N no: 20180828153M21YD b. 21 /5/2018 for SW 410; C/N no: 2018052212081GT</p> <p><u>Jaya estate</u> The estate maintain inventory for all SW generated in SW inventory form and was submitted to DOE through E-SWISS. Sighted the inventory for the month of July and August 2018. The SW generated was disposed through licensed contractor, Pentas Flora Kelantan. Sighted the consignment note as follows: a. 29 /9/2018 for SW 409; C/N no: 20180929112VNT1H</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>b. 29 /9/2018 for SW 305; C/N no: 2018092911DJWRK7</p> <p><u>Pinang Emas Estate</u>                      Inventory for all SW generated was maintained. Sighted the inventory of SW for the month of August and September 2018 documented in SW In/Out form and reported to DOE through E-SWISS. The SW was disposed through licensed contractor, Pentas Flora Kelantan. Sighted the consignment note as follows:                      a. 29 /9/2018 for SW 409; C/N no: 2018092911SR13GVM                      b. 29 /9/2018 for SW 305; C/N no: 2018092911H7FTY                      c. 29 /9/2018 for SW 410; C/N no: 20180929118WP20E</p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.                      - Minor compliance -</p>	<p>STPOM has established Waste Management Plan and the document was available for review. The plan has identified the waste generated, location/station generated, mitigation plan and person responsible for each plan. Sighted the implementation of plan as follows:</p> <ul style="list-style-type: none"> <li>i. Sighted the inventory of SW generated for the month July, August and September 2018</li> <li>ii. Sighted the disposal records for SW 305; C/N no: 20180828153M21YD dated 28 /8/2018.</li> </ul> <p>Estates visited has established Waste Management Plan and the document was available for review. The plan has identified the waste generated, location/station generated, mitigation plan and person responsible for each plan. Sighted the implementation of plan as follows:</p> <p><u>Jaya Estate</u></p> <ul style="list-style-type: none"> <li>i. Sighted the domestic waste collection records for the month of June, July and August 2018. The collection was done twice a week</li> </ul> <p><u>Pinang Emas Estate</u></p> <ul style="list-style-type: none"> <li>i. Wastewater from chemical premixing activities were recycled and reused for chemical premix. Sighted at the premixing area the water containment to collect the wastewater.</li> <li>ii. Biocompost application were observed at the estate at 40 m/ton per hectare</li> </ul>	<p>Complied</p>
<p><b>Criterion 5.4:</b>                      Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		



Criterion / Indicator		Assessment Findings	Compliance
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	The mill has established plan for improving the efficiency of the use of fossil fuel by planning to construct methane capture facilities. The biogas recovered will be utilized to generate energy.  The company have finished the contract interview stage and the contract was awarded to Concorde Sdn. Bhd. Project expected to complete the construction before 2019. Additionally, the mill is using industrial waste, fibre as boiler fuel. Sighted the record of fibre usage as follows: i. Jul 2018 – 545.47 MT ii. Aug 2018 – 1007.33 MT iii. Sep 2018 – 493.95	Complied
<b>Criterion 5.5:</b> Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	TDMP has established Zero Burning Policy and documented in Occupational Safety, Health and Environmental Policy signed by the CEO on 5 <sup>th</sup> June 2017. No evidence of open burning sighted during site visit.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	No use of fire for land preparation during replanting as sighted at replanting of P18 at Pinang Emas Estate. No open burning noted based on the records on the land clearing and felling for the replanting work. Method of land clearing and preparation was used such as (felling & chipping, cambering/land forming and path construction).	Complied
<b>Criterion 5.6:</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

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<p>5.6.1</p> <p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).                      - Major compliance -</p>	<p>The polluting activities identified in the Environmental Aspect and Impact assessment. Various monitoring has been conducted including the effluent analysis, stack monitoring and river water monitoring.</p> <p>In STPOM, effluent Analysis were submitted to DOE every 3 months through OER (Online Environmental Report). Noted the following report as follows:-                      2<sup>nd</sup> quarter report (1/4/2018 – 30/6/2018)</p> <table border="1" data-bbox="1025 651 1827 756"> <thead> <tr> <th>Parameter</th> <th>Apr 18</th> <th>May 18</th> <th>Jun 18</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>38</td> <td>37</td> <td>34</td> </tr> <tr> <td>Suspended Solid</td> <td>44</td> <td>86</td> <td>30</td> </tr> </tbody> </table> <p>All the parameters have conform to parameters limit for watercourse discharge.</p> <p>For continuous emission reporting system, it always online and send to HQ of Department of Environment in Putrajaya. Measurement of dust particulate concentration of Stack 1- Boiler (PMD 8703). Following is the monitoring report sighted:</p> <p>a. Ref no: L-GB-TC1705CSN-0530 dated 30/5/2017;                      The monitoring result indicated at 0.3446 gm/Nm<sup>3</sup>, lower than the permissible limit of 0.4 gm/Nm<sup>3</sup> stipulated under the Environmental Quality (Clean Air) Regulations, 1978.</p> <p>b. Ref no: L-GB-TC1711CSN-450 dated 27/11/2017                      The monitoring result indicated at 0.3985 gm/Nm<sup>3</sup>, lower than the permissible limit of 0.4 gm/Nm<sup>3</sup> stipulated under the Environmental Quality (Clean Air) Regulations, 1978.</p> <p>c. Ref no: L-GB-TC1806CSN-0155 dated 11/6/2018                      The monitoring result indicated at 0.2702 gm/Nm<sup>3</sup>, lower than the permissible limit of 0.4 gm/Nm<sup>3</sup> stipulated under the Environmental Quality (Clean Air) Regulations, 1978.</p>	Parameter	Apr 18	May 18	Jun 18	BOD	38	37	34	Suspended Solid	44	86	30	<p>Complied</p>
Parameter	Apr 18	May 18	Jun 18											
BOD	38	37	34											
Suspended Solid	44	86	30											

Criterion / Indicator		Assessment Findings	Compliance
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH4) emission through POME treatment. The company have plans to construct methane capture facilities. The biogas recovered will be utilized to generate energy.  The company have finished the contract interview stage and the contract was awarded to Concorde Sdn. Bhd. Project expected to complete the construction before 2019.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied. These GHG calculations were done as per certification unit basics including estates and mill. Data that were used to calculate the GHG emitted for 2017 was verified and according to the operation data. Summary emissions: a. Emission/ mt CPO= 0.74 tCO2 e/mt CPO b. Emission/ mt PK= 0.74 tCO2 e/mt PK	Complied
<b>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</b>			
<b>Criterion 6.1:</b> Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	SRA Consultancy has carried out Social Impact Assessment on 17/3 – 19/4/2012 for Sungai Tong Complex. The methods of the assessment were through interviews (focus group, one-to-one and informal), document review and site observation. The parties that involved during the assessment were estates and mill stakeholders, local communities, workers, government authorities, contractors and suppliers. Attendance list of the stakeholders that attended the assessment was sighted. The issues raised during the assessment were recorded in the report.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The assessment has involved the participation of stakeholders such as local communities, government authorities, contractors and suppliers. Evidence of attendance list was available.	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Social Action Plan 2018/2019 was developed in Sungai Tong POM on 9/8/2018. The issue raised during the stakeholder meeting was incorporated into the action plan. The action plan has included the time frame and person in charge that responsible for the concerns. Positive impacts were identified for all the negative impacts that have been resolved previously.  Monitoring Plan for Social was developed on 26/9/2018 to mitigate the negative impacts and promote the positives ones in Jaya Estate. Sampled of issue as below: a. Key finding: Poor facilities and infrastructure. Action plan: The management has budgeted 12 units of labour quarter on Y2019. Seen the 5 years' business plan for labour quarter found that the management has allocated budget for the construction of new quarters.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The last review was conducted on 9/8/2018 in Sungai Tong POM by the Compliance Executive and approved by the Mill Manager, 26/9/2018 in Jaya Estate by Assistant Manager and 2/5/2018 in Pinang Emas Estate.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	Not applicable as there is no scheme smallholder involved in the certification unit.	Not applicable

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 6.2:</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	TDM Plantation Sdn Bhd has developed a Communication Procedure with POM/ Estates. The information/ report reported shall be rectify within 28 working days. If the request is involved Head Office, then the management will submit the request to Head Office for further approval. All internal and external stakeholders were briefed on this procedure. Interviewed with the stakeholders during stakeholder consultation confirmed that they were briefed by the management and understood the communication procedure.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Managers of the Mill and Estates have been appointed as representative for the company to handle social issue in estates and mill's level. Appointment letter dated 18/9/2017 was issued by Human Resource and Administration Department from Head Office was sighted.	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Stakeholder list was developed in respective mill and supply bases. The list has included the stakeholders such as government authorities, local communities, NGO, contractors and suppliers.  Stakeholder meeting was conducted for northern region in TDMP on 30/7/2018. Stakeholders such as government agencies' representatives, FFB suppliers and workers' representatives, local communities, contractors and suppliers were invited and attended the meeting. Seen the attendance list and meeting minutes was sighted. Issue raised during the meeting has incorporated into the social action plan. Besides, policies were briefed to all of the stakeholders during the stakeholder meeting.	Complied
<b>Criterion 6.3:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			

Criterion / Indicator		Assessment Findings	Compliance
6.3.1	<p>The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has developed a Flowchart on Handling Social Issues (Complaint/ Grievance/ Request). The first consultation and negotiation should be handle within 14 working days after receipt of issue. If the issue is not resolved, further investigation need to be carried out and actions should be taken within 28 working days. Interviewed with the stakeholders found that they were aware of the complaint procedure.</p>	<p>Complied</p>

<p>6.3.2</p>	<p>Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –</p>	<p>Sungai Tong POM has implemented Housing Defect Report form and recorded complaints raised by workers related to housing. Sampled of reports as below:</p> <ul style="list-style-type: none"> <li>a. House No.: KP 3 dated 4/9/2018 Issue: Leakage of roof in kitchen and toilet area. Evidence: Seen the work order #201/18 dated 20/9/2018 for the installation of roof at KP3 and the complainant has acknowledged on the report after action has been taken.</li> <li>b. House No.: K 52, K 56, K 58, K 64, 39 and 40 dated 28/8/2018 Issue: Roof was damaged. Evidence: The mill management has appointed contractor to carry out the massive replacement of roof and seen the tax invoice #00002921 dated 10/9/2018 for the repair work done. The complainants have acknowledged accordingly after action has been taken.</li> </ul> <p>Jaya Estate has implemented Complaint Form and Request &amp; Response Form to record any complaints or requests from the stakeholders. Most of the requests were from the internal workers related for the housing repair. Sampled of the requests as below:</p> <ul style="list-style-type: none"> <li>a. House No.: Indonesian Worker dated 12/6/2018 Issue: Switch and lamp was out of order. Evidence: Repair work has been carried out on 19/6/2018 with the payment request from the workers for Work Order# A1577 was sighted.</li> </ul> <p>Pinang Emas Estate has developed Defect Form to record any housing defect in the estate and sampled of complaint as below:</p> <ul style="list-style-type: none"> <li>a. House No.: F4 dated 26/7/2018 Issue: Roof and water tank broken.</li> </ul>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		Evidence: Repair work has been carried out and the worker has submitted for payment on 26/8/2018 through verified the Payment for Work Order Zone A logbook.	
<b>Criterion 6.4:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	The company has developed SOP B7: Land Disputes, Rev. Feb 2017. The procedure has clearly described the process of resolve the land dispute issues. Objectives of the procedure is to ensure the land dispute is resolved in timely manner. Types of disputes are such as disputes over land boundaries, conflicts with land-owners and land ownerships. Verification process of conflict will be carried out and affected stakeholders need to be informed. Compensation and negotiation process will be carried out as per the mutual agreement of both parties.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP as per criteria 6.4.2.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Trenches were available to demarcate the boundary of land between the local communities.	Complied



Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 6.5:</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	<p>Mill and estates have employed local and foreign workers. All the mill and estates workers are under direct employment. The payslip has included basic pay, overtime, working days, deduction of salary such as Union, electricity and water bill. Payslip for October 2017, March 2018 and August 2018 was sampled based on the crop summary as below:</p> <ul style="list-style-type: none"> <li>a. Employee No.: SM00007 (STPOM)</li> <li>b. Employee No.: SM0900205 (STPOM)</li> <li>c. Employee No.: SM00084 (STPOM)</li> <li>d. Employee No.: SM00075 (STPOM)</li> <li>e. Employee No.: SM0900122 (STPOM)</li> <li>f. Employee No.: SM0900210 (STPOM)</li> <li>g. Employee No.: SM00003 (STPOM)</li> <li>h. Employee No.: JY1100481 (JE)</li> <li>i. Employee No.: JY1100547 (JE)</li> <li>j. Employee No.: JY1500779 (JE)</li> <li>k. Employee No.: JY1600822 (JE)</li> <li>l. Employee No.: JY1200638 (JE)</li> <li>m. Employee No.: JY1700823 (JE)</li> <li>n. Employee No.: PE0801232 (PEE)</li> <li>o. Employee No.: PE0801182 (PEE)</li> <li>p. Employee No.: PE0801265 (PEE)</li> <li>q. Employee No.: PE0801294 (PEE)</li> </ul> <p>All the sampled workers have achieved the Minimum Wage Order 2016 of RM 1000/ month or RM 38.46/day.</p>	Complied

<p>6.5.2</p>	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.          - Major compliance -</p>	<p>Employment contracts/ Offer letters are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, public holiday entitlement and annual leave, termination of services and etc. The contract was signed by the workers and sampled contracts as below:</p> <ul style="list-style-type: none"> <li>a. Employee No.: SM00084 (STPOM)</li> <li>b. Employee No.: SM0900152 (STPOM)</li> <li>c. Employee No.: SM0900210 (STPOM)</li> <li>d. Employee No.: SM00069 (STPOM)</li> <li>e. Employee No.: SM0900240 (STPOM)</li> <li>f. Employee No.: SM0900201 (STPOM)</li> <li>g. Employee No.: JY1700823 (JE)</li> <li>h. Employee No.: JY1700844 (JE)</li> <li>i. Employee No.: JY1700875 (JE)</li> <li>j. Employee No.: PE0801237 (PEE)</li> <li>k. Employee No.: PE0801255 (PEE)</li> <li>l. Employee No.: PE0801265 (PEE)</li> <li>m. Employee No.: PE0801294 (PEE)</li> </ul> <p>Extension contracts were sighted for the foreign workers who have worked more than 2 years. The terms stated in the extension contract was similar to their original signed contracts. Sampled of extension contracts as below:</p> <ul style="list-style-type: none"> <li>a. Employee No.: JY1400655 (JE)</li> <li>b. Employee No.: JY1500779 (JE)</li> <li>c. Employee No.: JY1500785 (JE)</li> <li>d. Employee No.: JY1100481 (JE)</li> <li>e. Employee No.: JY1000397 (JE)</li> <li>f. Employee No.: JY1600822 (JE)</li> <li>g. Employee No.: PE0801060 (PEE)</li> <li>h. Employee No.: PE0801065 (PEE)</li> </ul>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>i. Employee No.: PE0801068 (PEE)</li> <li>j. Employee No.: PE0801107 (PEE)</li> </ul>	
6.5.3	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>- Minor compliance –</p>	<p>Mill management has provided free medical facilities to all the employees. Besides, football field, badminton court and mosque were provided for the employees to utilized. Government schools were available inside the estates' compound.</p> <p>Linesite inspection was carried out weekly basis by Hospital Assistant in Sungai Tong POM, Jaya Estate and Pinang Emas Estate. Records of inspections were sighted in both estates. Assistant Manager and Manager has acknowledged on the inspections that had carried out. Surrounding of the housing complex, drainage system, wiring and crèches were inspected.</p> <p>During linesite visit to the workers' quarters found that the cleanliness at the compound was satisfactory. Gotong-royong and linesite inspections were carried out by Hospital Assistant on weekly basis to ensure the cleanliness is maintained.</p>	Complied
6.5.4	<p>Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>The mill and estates were located nearby villages where the workers can access easily to adequate, sufficient and affordable foods. Interviewed with the workers found that they were satisfied with the price of goods and foods.</p>	Complied
<p><b>Criterion 6.6:</b>            The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			

Criterion / Indicator		Assessment Findings	Compliance
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	The company has implemented and developed Social Policy dated 1/6/2017 and Freedom of Association Policy dated 1/6/2017 where the company committed to comply to the freedom of the employees to join and form any association and bargain collectively. The policy was in local language that understood by the workers through interviewed with them. Briefing of the policies were provided to the external stakeholders on 30/7/2018 during stakeholder meeting and workers on 1/8/2018 in Sungai Tong POM.	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Workers' Committee was established in Sungai Tong POM and meeting was carried out at least once a year. The last meeting was conducted on 17/9/2018 with total 7 attendees. Issues reported during meeting were recorded in the meeting minutes. For eg: a. Issue: Grasses in housing complex of Sungai Tong POM were growing fast during raining season. Respond from management: The management will arrange the general workers to carry out grass cutting. Action: Site visit to the housing complex found that grass cutting activity was carried out.  NUPW committee was established in Jaya Estate and Pinang Emas Estate. Meeting was conducted to discuss the welfare and issue of workers. The last meeting was conducted on 20/6/2018 in Jaya Estate and 10/6/2018 in Pinang Emas Estate. Issue that discussed in the meeting was recorded in the minutes with solution from the management.	Complied
<b>Criterion 6.7:</b> Children are not employed or exploited.			

Criterion / Indicator		Assessment Findings	Compliance
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	TDM Plantation Sdn Bhd has developed Social Policy and Protection of Children Policy dated 1/6/2017 where the company will not exploit and involve in the child labour which under 16 years old. Document reviewed on the master list confirmed that no child labour was employed in the company. Besides, interviewed with the workers and local communities confirmed that all the workers employed were above 18 years old. Briefing of the policies were provided to the external stakeholders on 30/7/2018 during stakeholder meeting and workers on 1/8/2018 in Sungai Tong POM.	Complied
<b>Criterion 6.8:</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	TDM Plantation Sdn Bhd has developed Human Rights Policy dated 1/6/2017 and Social Policy dated 1/6/2017. These policies have stated that the management was committed to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, gender and etc. Interviewed with workers confirmed that no discrimination was practice by the management. Briefing of the policies were provided to the external stakeholders on 30/7/2018 during stakeholder meeting and workers on 1/8/2018 in Sungai Tong POM.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Interviewed with the workers consisted of different nationalities and different gender confirmed that they are treated equally without any discrimination. The workers were provided with standard treatment such as free medical treatment, fair overtime offered to all the workers whoever want to work and free housing to everyone.	Complied

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6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	TDM Plantation Sdn Bhd has developed Foreign Workers Policy dated 1/6/2017 where the company has decided to recruit foreign workers within the framework of Employment Act 1955, Immigration Act 1959/63 and Workmen’s Compensation Act 1952. Besides, SOP B6: Foreign Workers Recruitment was developed to ensure the recruitment of estates workers should be practice at pre-determined procedure by complying with legal requirements.	Complied
<b>Criterion 6.9:</b> There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Gender Policy was developed and implemented in TDM Plantation Sdn Bhd where the company has the responsibility to take care the rights of workers. They will protect the rights of female workers and action will be taken immediately if there is any sexual harassment case reported. Briefing of the policies were provided to the external stakeholders on 30/7/2018 during stakeholder meeting and workers on 1/8/2018 in Sungai Tong POM.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	The company has developed the Reproductive Right Policy dated 1/6/2017. The employees have the rights to decide the number of children and when they want it. The management will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment, religious, gender, country of origin and etc. They will ensure that the rights of women will be protected. Briefing of the policies were provided to the external stakeholders on 30/7/2018 during stakeholder meeting and workers on 1/8/2018 in Sungai Tong POM.	Complied

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6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	Complied
<b>Criterion 6.10:</b> Growers and mills deal fairly and transparently with smallholders and other local businesses.		
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Complied

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<p>6.10.4</p>	<p>Agreed payments shall be made in a timely manner.            - Minor compliance -</p>	<p>The term for payment has agreed by both parties which is 14 days from the date of receipt of invoice from contractors. Document verified the invoices and payment vouchers confirmed that payment was made accordingly. Sampled of invoice and payment voucher as below:</p> <ul style="list-style-type: none"> <li>a. INV# A0182 dated 30/6/2018 with Payment Voucher# 146/18 dated 4/7/2018.</li> <li>b. INV# 064179 dated 1/9/2018 with Payment Voucher# 196/18 dated 6/9/2018,</li> </ul> <p>However, sampled the invoices submitted by contractor in Sungai Tong POM and e-Payment voucher issued by Head Office found that payment was made not according to the agreed terms as below:</p> <ul style="list-style-type: none"> <li>a. Invoice# 252/18 dated 30/6/2018 and submitted to mill management on 12/7/2018 e-Payment Voucher Ref. No.# JV 41560 dated 3/9/2018</li> <li>b. Invoice# 275/18 dated 23/7/2018 and submitted to mill management on 23/7/2018 e-Payment Voucher Ref. No.# JV 41560 dated 3/9/2018</li> <li>c. Invoice# 224/18 dated 31/5/2018 and submitted to mill management on 7/6/2018 e-Payment Voucher Ref. No.# JV 0040695 dated 5/7/2018</li> <li>d. Invoice# 181/18 dated 30/4/2018 and submitted to mill management on 14/5/2018 e-Payment Voucher Ref. No.# JV 0040391 dated 10/6/2018</li> <li>e. Invoice# 238/18 dated 30/5/2018 and submitted to mill management on 1/7/2018 e-Payment Voucher Ref. No.# JV 0040990 dated 30/7/2018</li> </ul> <p>Thus, Minor NC was raised.</p>



Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 6.11:</b> Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	Mill and estates’ management has made contribution to the local communities and workers. The management has provided recreational facilities such as football field, community hall and mosque to the local communities. Besides, the management has made donation to schools for the events upon request by the stakeholders. Interviewed with the representative from school confirmed that the management has provided van transport to send the children to events outside of school. Bowling competition, religion class and dinner together with workers for celebration event was organized as well.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	Not applicable as there was no scheme smallholder involved in the certification unit.	Not applicable
<b>Criterion 6.12:</b> No forms of forced or trafficked labour are used.			

<p>6.12.1</p>	<p>There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -</p>	<p>The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers. Sampled of foreign workers with valid work permit as below:</p> <ul style="list-style-type: none"> <li>a. Permit No.: PD 9657601 valid until 10/12/2018 (JE)</li> <li>b. Permit No.: PE 1451635 valid until 15/7/2019 (JE)</li> <li>c. Permit No.: PE 0161097 valid until 26/2/2019 (JE)</li> <li>d. Permit No.: PE 0304434 valid until 28/2/2019 (JE)</li> <li>e. Permit No.: PE 0500767 valid until 21/4/2019 (JE)</li> <li>f. Permit No.: PD 9874963 valid until 19/1/2019 (JE)</li> <li>g. Permit No.: PD 8277352 valid until 14/3/2019 (PEE)</li> <li>h. Permit No.: PE 8277697 valid until 18/3/2019 (PEE)</li> <li>i. Permit No.: PE 0807486 valid until 6/5/2019 (PEE)</li> <li>j. Permit No.: PD 8277130 valid until 5/3/2019 (PEE)</li> </ul> <p>Interviewed with the foreign workers confirmed that they are allowed to hold their passport by themselves or surrendered to the management for safe keeping. Seen the consent letter for the workers who surrendered the passport to management as well as the Declaration of Understanding to Hold Passport themselves. Sampled of the consent letter for the new workers as below:</p> <ul style="list-style-type: none"> <li>a. Passport No.: AU 206932</li> <li>b. Passport No.: AU 208502</li> </ul> <p>Sampled of Declaration of Understanding to Hold Passport themselves as below:</p> <ul style="list-style-type: none"> <li>a. Passport No.: BH 0911641</li> <li>b. Passport No.: BK 0902702</li> <li>c. Passport No.: BQ 0573800</li> <li>d. Passport No.: BR 0271004</li> </ul> <p>Interviewed with the foreign workers confirmed that they have freedom to go out from the compound during off day.</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	Interviewed with the foreign workers confirmed that the job offered in their home countries was similar after they arrived in Malaysia. No contract substitution was reported.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	<p>TDM Plantation Sdn Bhd has implemented Code of Ethical Conduct Policy dated 1/8/2017. The policy has stated the following criteria as below:</p> <ul style="list-style-type: none"> <li>a. No child labour or forced labour being practice.</li> <li>b. Provide decent living conditions and working condition.</li> <li>c. Provide induction training prior work.</li> <li>d. Equal opportunity to all the workers.</li> <li>e. No contract substitution for the workers.</li> </ul> <p>Induction training was conducted for new foreign workers to brief the terms and conditions stated in the employment contract, rules and regulations in Malaysia, culture in the estates and other job handling training. Seen the training record for last batch of new employed workers on 20/5/2018 for 2 workers arrived on 19/5/2019 in Jaya Estate and 19/5/2018 for 12 workers in Pinang Emas Estate.</p>	Complied
<p><b>Criterion 6.13:</b>            Growers and millers respect human rights.</p>			

Criterion / Indicator		Assessment Findings	Compliance
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	TDM Plantation Sdn Bhd has developed and implemented Human Rights Policy dated 1/6/2017 and Social Policy dated 1/6/2017 which signed by CEO. The company is committed to develop culture of supporting human rights. They support the principles of Universal Declaration of Human Rights and ILO Core Convention on Labour Standard. The policy covered for the employees, suppliers and contractors, local communities and the other society. Briefing of the policies were provided to the external stakeholders on 30/7/2018 during stakeholder meeting and workers on 1/8/2018 in Sungai Tong POM. The policies were displayed at the notice board outside the office.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable in Peninsular Malaysia.	Not applicable
<b>Principle 7: Responsible development of new plantings</b>			
Sungai Tong Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area.			
<b>Principle 8: Commitment to continual improvement in key areas of activity</b>			
<b>Criterion 8.1:</b> Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);               <ul style="list-style-type: none"> <li>• Optimising the yield of the supply base.</li> </ul> </li> </ul> <p>- Major compliance -</p>	<p>The continual improvement plan for Sg Tong POM and supply bases was established, sighted the plan as follow:</p> <ol style="list-style-type: none"> <li>1. To promote 3R programe</li> <li>2. To provide better housing condition</li> <li>3. To achieve higher mill throughput</li> <li>4. To construct biogas plant</li> <li>5. Upgrading of local exhaust ventilation</li> <li>6. To install boiler particulate emission system/scrubber</li> <li>7. To construct new workers housing</li> <li>8. Install rain water harvesting</li> </ol>	<p>Complied</p>

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**Appendix B: Approved Time Bound Plan**

No	Name of the Estate and Mills	TBP for certification	Status as Aug, 2016	Any unresolved (Labour Disputes/Land conflicts/Legal Non-Compliance etc.)	
1	TDM Plantation Sdn. Bhd. Tebak Estate , Kemaman, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill, Kemaman, Terengganu, Malaysia.	Nov, 2013	Certified	None
2	TDM Plantation Sdn. Bhd. Pelantoh Estate , Kemaman, Terengganu, Malaysia		Nov, 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jernih Estate , Kemaman, Terengganu, Malaysia		Nov, 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Air Putih Estate , Kemaman, Terengganu, Malaysia		Nov, 2013	Certified	None
5	TDM Plantation Sdn. Bhd. Gajah Mati Estate, Dungun, Terengganu, Malaysia		Nov, 2013	Certified	None
6	TDM Plantation Sdn. Bhd. MAIDAM Estate, Dungun, Terengganu, Malaysia		Nov, 2013	Certified	None
1	TDM Plantation Sdn. Bhd. Tayor Estate, Setiu, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Sungai Tong Palm Oil Mill, Setiu, Terengganu, Malaysia.	Dec, 2013	Certified	None
2	TDM Plantation Sdn. Bhd. Pelong Estate , Setiu, Terengganu, Malaysia		Dec, 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jaya Estate , Setiu, Terengganu, Malaysia		Dec, 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Fikri Estate , Setiu, Terengganu, Malaysia		Dec, 2013	Certified	None
5	TDM Plantation Sdn. Bhd. Pinang Emas Estate, Dungun, Terengganu, Malaysia		Dec, 2013	Certified	None
6	TDM Plantation Sdn. Bhd. Jerangau Estate, Ajil, Terengganu, Malaysia		Dec, 2013	Certified	None

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2017** for **Sungai Tong Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 3.0.1. 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 **[2017]** for **[Sg Tong POM]** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.74
PK	0.74

Extraction	%
OER	18.48
KER	4.75

Production	t/yr
FFB Process	207,142.91
CPO Produced	38,270.76
PK Produced	9,838.80

Land Use	Ha
OP Planted Area	13,930.26
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>13,930.26</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	95,015.16	0.48	0	0	0	0	95,015.16	0.48
CO <sub>2</sub> Emission from fertilizer	10,505.40	0.04	0	0	0	0	10,505.40	0.04
NO <sub>2</sub> Emmision	8,316.45	0.03	0	0	0	0	8,316.45	0.03
Fuel Consumption	1,018.81	0.01	0	0	0	0	1,018.81	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	(91,056.93)	(0.47)	0	0	0	0	(91,056.93)	(0.47)
Conservation Sequestration	0	0	0	0	0	0	0	0
<b>Total</b>	<b>23,798.89</b>	<b>0.1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>23,798.89</b>	<b>0.1</b>

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*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	11,237.64	0.05
Fuel Consumption	399.38	0
Grid Electricity Utilisation	116.16	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>11,753.18</b>	<b>0.06</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	7,270.69
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

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



**Appendix D: General Chain of Custody Requirements for the Supply Chain**

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Sg Tong POM takes the legal ownership and physically handles RSPO certified FFB from the estates and produce CPO and PK.	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Sg Tong POM is not a trader or distributor.	Yes
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	TDM Plantation Sdn Bhd held RSPO membership number: 1-0095-11-000-00 since 28 February 2011. Company has registered in Palm Trace system as follows: Members ID – Sg Tong Palm Oil Mill: RSPO_PO1000001113 Licence valid until 26/12/2018 Member category : Oil Mill	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Processing aids was not in used at Sg Tong Palm oil Mill.	Yes
<b>5.2 Supply chain model</b>			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Sg Tong Palm Oil Mill receives and process both certified and noncertified 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-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Yes

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5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Sg Tong Palm Oil Mill was certified with Mass Balance Module.	Yes
<b>5.3. Documented Procedures</b>			
5.3.1	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	SOP for RSPO Supply Chain (TDM/KPOM/STPOM/01), Revision: Mill-01/2018, Dated July 2018 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.	Yes
	<ul style="list-style-type: none"> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	<p>Sg Tong Palm Oil Mill has prepared a dedicated records and Forms in relation to RSPO Supply Chain Certification.</p> <p>Sustainability training plan &amp; records for year 2018 sighted available during the audit. The training was conducted on 8/8/2018. Interview with weighbridge operator found that he understand on the supply chain for palm oil mill.</p>	Yes
	<ul style="list-style-type: none"> <li>• 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 organization's procedures for the implementation of this standard.</li> </ul>	<p>SOP for RSPO Supply Chain (TDM/KPOM/STPOM/01), Revision: Mill-01/2018, Dated July 2018 has identified every responsible personal who involved in the implementation RSPO Supply Chain Certification. Roles and responsibility for RSPO.</p> <p>Sighted the appointment letter dated 1/7/2017 for compliance executive which covered Supply Chain element.</p> <p>Through the interview with compliance executive, she can demonstrate awareness of the established procedure.</p>	Yes
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	SOP for RSPO Supply Chain (TDM/KPOM/STPOM/01), Revision: Mill-01/2018, Dated July 2018 which covered the internal audit. The internal audit was conducted on 21/8/2018 by TDM Sustainability Department personnel.	Major nonconformance

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	<p>ii) effectively implements and maintains the standard requirements within its organization</p>	<p>SOP for RSPO Supply Chain (TDM/KPOM/STPOM/01), Revision: Mill-01/2018, Dated July 2018 which covered the internal audit. The internal audit was conducted on 21/8/2018 by TDM Sustainability Department personnel. There was 1 NCR was raised during the internal audit. The NCR was closed on 26/8/2018.</p> <p>However, during the competency for lead auditor was not fully demonstrated. Thus, Major NC was raised.</p>	
<p><b>5.4. Purchasing and goods in</b></p>			
<p>5.4.1</p>	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified during the audit as follow:</p> <p>Fikri Estate  Date: 14/8/2018,  Ticket No# 103843,  Field :93A2,  Tonnage: 5.83mt</p> <p>Jaya Estate  Date: 12/8/2018,  Ticket No# 30168,  Field :95A1,  Tonnage: 8.36mt</p> <p>Pelong Estate  Date: 21/8/2018,  Ticket No# 16753,  Field :97A,  Tonnage: 8.04mt</p> <p>Tayor Estate  Date: 18/8/2018,  Ticket No# 60366,  Field :96,  Tonnage: 7.40mt</p> <p>Jerangau Estate  Date: 9/8/2018,  Ticket No# 1353,  Field :91A2  Tonnage: 31.98mt</p> <p>Pinang Emas Estate  Date: 7/7/2018,</p>	<p>Yes</p>

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	<p>Ticket No# 20699,  Field :96A2  Tonnage: 31.18mt</p>	
<ul style="list-style-type: none"> <li>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).</li> </ul>	<p>All the information stated in the records were found complete. Records verified during the audit as follow:</p> <p>Fikri Estate  Date: 14/8/2018,  Ticket No# 103843,  Field :93A2,  Tonnage: 5.83mt</p> <p>Jaya Estate  Date: 12/8/2018,  Ticket No# 30168,  Field :95A1,  Tonnage: 8.36mt</p> <p>Pelong Estate  Date: 21/8/2018,  Ticket No# 16753,  Field :97A,  Tonnage: 8.04mt</p> <p>Tayor Estate  Date: 18/8/2018,  Ticket No# 60366,  Field :96,  Tonnage: 7.40mt</p> <p>Jerangau Estate  Date: 9/8/2018,  Ticket No# 1353,  Field :91A2  Tonnage: 31.98mt</p> <p>Pinang Emas Estate  Date: 7/7/2018,  Ticket No# 20699,  Field :96A2  Tonnage: 31.18mt</p>	<p>Yes</p>
<ul style="list-style-type: none"> <li>The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and</li> </ul>	<p>All the information stated in the records were found complete. The records by the mill received the FFB from certified estate was verified. Records verified during the audit as follow:</p> <p>Fikri Estate  Date: 14/8/2018,  Ticket No# 103843,</p>	<p>Yes</p>

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	<p>Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.</p>	<p>Field :93A2, Tonnage: 5.83mt</p> <p>Jaya Estate Date: 12/8/2018, Ticket No# 30168, Field :95A1, Tonnage: 8.36mt</p> <p>Pelong Estate Date: 21/8/2018, Ticket No# 16753, Field :97A, Tonnage: 8.04mt</p> <p>Tayor Estate Date: 18/8/2018, Ticket No# 60366, Field :96, Tonnage: 7.40mt</p> <p>Jerangau Estate Date: 9/8/2018, Ticket No# 1353, Field :91A2 Tonnage: 31.98mt</p> <p>Pinang Emas Estate Date: 7/7/2018, Ticket No# 20699, Field :96A2 Tonnage: 31.18mt</p>	
	<ul style="list-style-type: none"> <li>• A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	<p>Not applicable</p>	<p>N/A</p>
	<ul style="list-style-type: none"> <li>• The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements.</li> </ul>	<p>Not applicable</p>	<p>N/A</p>

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5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Sg Tong Palm Oil Mill has established SOP for RSPO Supply Chain (TDM/KPOM/STPOM/01), Revision: Mill-01/2018, Dated July 2018 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, training, reclassification of mill's supply chain model and production volume.	Yes
<b>5.5. Outsourcing activities</b>			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	No outsourcing activities at Sg Tong POM.	N/A
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	No outsourcing activities at Sg Tong POM.	N/A
	<p>b. The site 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 site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	No outsourcing activities at Sg Tong POM.	N/A

	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	No outsourcing activities at Sg Tong POM.	N/A
	d. The site seeking or holding certification 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 any and all information, when this is announced in advance.	No outsourcing activities at Sg Tong POM.	N/A
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	No outsourcing activities at Sg Tong POM.	N/A
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	No outsourcing activities at Sg Tong POM.	N/A
<b>5.6. Sales and goods out</b>			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>Sg Tong POM sold CPO and PK as RSPO certified (MB) for the period of Sep 17 – Sep 18. Sample the weighbridge ticket/docket note as below:</p> <p>Buyer: Keck Seng (Malaysia) Bhd, Masai  Contract No: PO180513 dated 18/5/2018  Quantity: 500 MT  Product: CSPO (MB)  Docket No: S0037120, date:27/5/18  Quantity: 29.24mt  Lorry No: TAJ3778  Certificate No:RSPO595564</p> <p>Buyer: Keck Seng (Malaysia) Bhd  Contract No: PO180514 dated 18/5/2018  Quantity: 500 MT  Product: CSPO (MB)  Docket No: S0037188, date:31/5/18  Quantity: 34.86mt  Lorry No: TS8439  Certificate No:RSPO595564</p>	Yes

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		<p>Buyer: Ngo Chew Hong Oils &amp; Fats (M) Sdn Bhd  Contract No: PO180502 dated 21/3/2018  Transaction ID:  Quantity: 160 MT  Product: CSPO (MB)  Docket No: S0036764, date:6/5/18  Quantity: 42.42 mt  Lorry No: BLS2077  Certificate No:RSPO595564</p> <p>Buyer: Ngo Chew Hong Oils &amp; Fats (M) Sdn Bhd  Contract No: PO180503 dated 17/4/2018  Transaction ID:  Quantity: 160 MT  Product: CSPO (MB)  Docket No: S0036905, date:17/5/18  Quantity: 40.89mt  Lorry No: BMN2077  Certificate No:RSPO595564</p> <p>Buyer: Hup Lee Oil Mill Sdn Bhd, Klang  Contract No: PK180502 dated 28/4/2018  Transaction ID:  Quantity: 540 MT  Product: CSPK (MB)  Docket No: S0037346, date:10/6/18  Quantity: 24.58mt  Lorry No: MBY7940  Certificate No:RSPO595564</p>	
	<ul style="list-style-type: none"> <li>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).</li> </ul>	<p>Seen the weighbridge ticket, shipping documents as per sampled below:</p> <p>Buyer: Keck Seng (Malaysia) Bhd, Masai  Contract No: PO180513 dated 18/5/2018  Quantity: 500 MT  Product: CSPO (MB)  Docket No: S0037120, date:27/5/18  Quantity: 29.24mt  Lorry No: TAJ3778  Certificate No:RSPO595564</p> <p>Buyer: Keck Seng (Malaysia) Bhd  Contract No: PO180514 dated 18/5/2018  Quantity: 500 MT  Product: CSPO (MB)  Docket No: S0037188, date:31/5/18  Quantity: 34.86mt  Lorry No: TS8439  Certificate No:RSPO595564</p>	<p>Yes</p>



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		<p>Buyer: Ngo Chew Hong Oils &amp; Fats (M) Sdn Bhd  Contract No: PO180502 dated 21/3/2018  Transaction ID:  Quantity: 160 MT  Product: CSPO (MB)  Docket No: S0036764, date:6/5/18  Quantity: 42.42 mt  Lorry No: BLS2077  Certificate No:RSPO595564</p> <p>Buyer: Ngo Chew Hong Oils &amp; Fats (M) Sdn Bhd  Contract No: PO180503 dated 17/4/2018  Transaction ID:  Quantity: 160 MT  Product: CSPO (MB)  Docket No: S0036905, date:17/5/18  Quantity: 40.89mt  Lorry No: BMN2077  Certificate No:RSPO595564</p> <p>Buyer: Hup Lee Oil Mill Sdn Bhd, Klang  Contract No: PK180502 dated 28/4/2018  Transaction ID:  Quantity: 540 MT  Product: CSPK (MB)  Docket No: S0037346, date:10/6/18  Quantity: 24.58mt  Lorry No: MBY7940  Certificate No:RSPO595564</p>	
	<ul style="list-style-type: none"> <li>For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	<p>Sampled the shipping announcement as below:</p> <p>Buyer: Keck Seng (Malaysia) Bhd, Masai  Contract No: PO180513 dated 18/5/2018  Transaction ID: TR-bc29b4bc-353e  Quantity: 500 MT  Product: CSPO (MB)  Shipping/BL Date: 29/5/18</p> <p>Buyer: Keck Seng (Malaysia) Bhd  Contract No: PO180514 dated 18/5/2018  Transaction ID: TR-ff3bb1c5-95b7  Quantity: 500 MT  Product: CSPO (MB)  Shipping/BL Date: 5/6/18</p> <p>Buyer: Ngo Chew Hong Oils &amp; Fats (M) Sdn Bhd  Contract No: PO180502 dated 21/3/2018</p>	<p>Yes</p>

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		<p>Transaction ID: TR-44389d27-2903  Quantity: 160 MT  Product: CSPO (MB)  Shipping/BL Date: 28/6/18</p> <p>Buyer: Ngo Chew Hong Oils &amp; Fats (M) Sdn Bhd  Contract No: PO180503 dated 17/4/2018  Transaction ID: TR-d85e10a4-9c04  Quantity: 160 MT  Product: CSPO (MB)  Shipping/BL Date: 18/5/18</p> <p>Buyer: Hup Lee Oil Mill Sdn Bhd, Klang  Contract No: PK180502 dated 28/4/2018  Transaction ID: TR-7fcd81f3-528d  Quantity: 540 MT  Product: CSPK (MB)  Shipping/BL Date: 7/5/18</p>	
<b>5.7. Registration of transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries and;</li> <li>take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	<p>Company has registered their mill in the PalmTrace:-  Members ID – Sg Tong Palm Oil Mill: RSPO_PO1000001113  Licence valid until 26/12/2018  Member category : Oil Mill</p>	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> </ul>	<p>Sampled the shipping announcement as below:</p> <p>Buyer: XXXXX, Masai  Contract No: PO180513 dated 18/5/2018  Transaction ID: TR-bc29b4bc-353e  Quantity: 500 MT  Product: CSPO (MB)  Shipping/BL Date: 29/5/18</p> <p>Buyer: XXXXX, Masai  Contract No: PO180514 dated 18/5/2018  Transaction ID: TR-ff3bb1c5-95b7  Quantity: 500 MT  Product: CSPO (MB)  Shipping/BL Date: 5/6/18</p> <p>Buyer: XXXXX  Contract No: PO180502 dated 21/3/2018</p>	Yes

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		<p>Transaction ID: TR-44389d27-2903 Quantity: 160 MT Product: CSPO (MB) Shipping/BL Date: 28/6/18</p> <p>Buyer: XXXXX Contract No: PO180503 dated 17/4/2018 Transaction ID: TR-d85e10a4-9c04 Quantity: 160 MT Product: CSPO (MB) Shipping/BL Date: 18/5/18</p> <p>Buyer: XXXXX Contract No: PK180502 dated 28/4/2018 Transaction ID: TR-7fcd81f3-528d Quantity: 540 MT Product: CSPK (MB) Shipping/BL Date: 7/5/18</p>	
	<ul style="list-style-type: none"> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> </ul>	<p>Sampled the shipping announcement as below:</p> <p>Buyer: XXXXX Contract No: PO180513 dated 18/5/2018 Transaction ID: TR-bc29b4bc-353e Quantity: 500 MT Product: CSPO (MB) Shipping/BL Date: 29/5/18</p> <p>Buyer: XXXXX Contract No: PO180514 dated 18/5/2018 Transaction ID: TR-ff3bb1c5-95b7 Quantity: 500 MT Product: CSPO (MB) Shipping/BL Date: 5/6/18</p> <p>Buyer: XXXXX Contract No: PO180502 dated 21/3/2018 Transaction ID: TR-44389d27-2903 Quantity: 160 MT Product: CSPO (MB) Shipping/BL Date: 28/6/18</p> <p>Buyer: XXXXX Contract No: PO180503 dated 17/4/2018 Transaction ID: TR-d85e10a4-9c04 Quantity: 160 MT Product: CSPO (MB) Shipping/BL Date: 18/5/18</p> <p>Buyer: XXXXX Contract No: PK180502 dated 28/4/2018</p>	<p>Yes</p>

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		Transaction ID: TR-7fcd81f3-528d Quantity: 540 MT Product: CSPK (MB) Shipping/BL Date: 7/5/18	
	<ul style="list-style-type: none"> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	Sg Tong Palm Oil Mill had sold some amount as conventional, the amount sold as conventional was stated in the supply chain declaration.	Yes
	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	All the sampled contract were confirmed.	Yes
<b>5.8. Training</b>			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	The training plan was include supply Chain training which has been conducted on 8/8/2018, attended by 8 attendants from various position such as clerk, weighbridge, laboratory assistant and others.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Training related to supply chain was conducted on 8/8/2018 to all operators and staff at Sg Tong POM.	Yes
<b>5.9. Record Keeping</b>			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Sg Tong POM has keep the records such as SOP, training, despatch note as per RSPO SCC Standard 2017 requirement. Sampled seen as per 5.4.1, 5.6.1.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	The records are kept for minimum 2 years as per own established SOP. All records kept in the weighbridge office.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	The forecast volume for January 2019 – December 2019 as per RSPO Public Summary Report.	Yes

<b>5.10. Conversion factors</b>			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Not applicable	N/A
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Not applicable	N/A
<b>5.11. Claims</b>			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	Not in use	Yes
<b>5.12. Complaints</b>			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Sg Tong POM has established SOP for RSPO Supply Chain (TDM/KPOM/STPOM/01), Revision: Mill-01/2018, Dated July 2018 which covered complaints element. As todate, no complaint received by the customers/buyer.	Yes
<b>5.13. Management Review</b>			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	Sg Tong POM has established SOP for RSPO Supply Chain (TDM/KPOM/STPOM/01), Revision: Mill-01/2018, Dated July 2018 which covered management review, which need to be conducted on annually at planned intervals. The management review for Sg Tong POM was conducted on 23/9/2018, chaired by the mill manager.	Yes
5.13.2	The input to management review shall include information on:	The management review for Sg Tong POM was conducted on 23/9/2018, chaired by the mill manager. All the inputs have been	Yes

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	<ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> </ul> <p>Recommendations for improvement.</p>	discussed accordingly, eg: Results of internal audits covering RSPO Supply Chain Certification Standard, Customer feedback, Status of preventive and corrective actions, Follow-up actions from management reviews, Changes that could affect the management system, Recommendations for improvement.	
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> </ul> <p>Resource needs.</p>	The management review for Sg Tong POM was conducted on 23/9/2018, chaired by the mill manager. All the outputs have been discussed accordingly, eg: Improvement of the effectiveness of the management system and its processes and resource needs.	Yes
<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Sg Tong POM and verified through document and site review (notice board, business card, shipping documentation, contract). TDM Plantations Sdn Bhd has stated the member's history with regard to RSPO in the company's website.	Yes
4.2	<p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> <li>Display its RSPO membership status</li> <li>Display the RSPO web address (www.rspo.org)</li> <li>State that the member supports the work of the RSPO</li> <li>State the member's history with regard to the RSPO.</li> <li>Use the RSPO trademark to promote its membership of the RSPO.</li> </ol> <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>	Sg Tong POM does not use any RSPO trademark or logo in any general corporate communication by verified through the company website, invoices, letter head, contract with customers and others relevant records. TDM Plantations Sdn Bhd has stated the member's history with regard to RSPO in the company's website.	Yes
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the	The statement of member's history with regard to RSPO in the company's website does not implies the company is selling RSPO-certified oil palm products.	Yes

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	selling of RSPO-certified oil palm products.		
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.	The statement of member's history with regard to RSPO in the company's website does not implies the company is selling RSPO-certified oil palm products.	Yes
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 Sg Tong POM and verified through document and site review (notice board, business card, shipping documentation, contract).	Yes
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Yes
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that RSPO certified	Yes
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. b. If the distributor or wholesaler is supply chain-certified they should	Sg Tong POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	N/A

	follow the requirements outlined in section 5.2.		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	Sg Tong POM is producing crude palm product and does not involved in any labelling of end product and the presence of certified palm oil contained within a product. This requirement is for the next supply chain actor and not applicable for POM.	N/A
<b>Business to consumer communication</b>			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	No business to consumer communication on product specific claim made Sg Tong POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made Sg Tong POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made Sg Tong POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made Sg Tong POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made Sg Tong POM and only produce crude and unfinished product. This is not applicable for POM.	N/A



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6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made Sg Tong POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made Sg Tong POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .	No business to consumer communication on product specific claim made Sg Tong POM and only produce crude and unfinished product. This is not applicable for POM.	N/A

**MODULE B – MASS BALANCE SPECIFIC RULES**

**Minimum Mass Balance content (MB)**

	95% or above of the oil palm content must be RSPO MB-certified.	Sg Tong POM is producing crude palm product.	Yes
	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	Sg Tong POM is producing crude palm product.	N/A

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	accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.		
<b>Labelling and trademark (MB)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• 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).</li> <li>• 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 &amp; Claims document.</li> </ul>	Sg Tong POM is producing crude palm product and does not involved in any labelling of end product.	N/A
<b>Messaging (MB)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>• [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-</li> </ul>	Sg Tong POM is producing crude palm product and does not involved in any labelling of end product.	N/A

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	<p>certified oil palm products in the supply chain.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>		
	<p>Messaging NOT ALLOWED in storytelling in product-related communications:          Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	<p>Sg Tong POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>N/A</p>

**Appendix E: CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance )**

<b>E.1 Definition</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
E.1.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Sg Tong Palm Oil Mill received certified FFB and uncertified FFB. Therefore qualifies for the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Yes
<b>E.2 Explanation</b>			
E.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit 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.	Yes
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	Company has registered their mill in the PalmTrace:- Members ID – Sg Tong Palm Oil Mill: RSPO_PO1000001113 Licence valid until 26/12/2018 Member category : Oil Mill	Yes
<b>E.3 Documented procedures</b>			
E.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:	SOP for RSPO Supply Chain (TDM/KPOM/STPOM/01), Revision: Mill-01/2018, Dated July 2018 which covered control of documents and records, delivery of FFB from the estate, receiving FFB at the mill, process monitoring, CPO and PK	Yes

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	a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	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.	
	b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.	The mill manager and assistant manager have awareness of the supply chain system. During interview with mill manager, he had explained that he has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.	Yes
E.3.2	The site shall have documented procedures for receiving and processing certifies an non-certified FFBs.	SOP for RSPO Supply Chain (TDM/KPOM/STPOM/01), Revision: Mill-01/2018, Dated July 2018 which covered receiving and processing certifies and non-certified FFB.	Yes
<b>E.4 Purchasing and goods in</b>			
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBs received.	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified during the audit as follow:</p> <p>Fikri Estate  Date: 14/8/2018,  Ticket No# 103843,  Field :93A2,  Tonnage: 5.83mt</p> <p>Jaya Estate  Date: 12/8/2018,  Ticket No# 30168,  Field :95A1,  Tonnage: 8.36mt</p> <p>Pelong Estate  Date: 21/8/2018,  Ticket No# 16753,  Field :97A,  Tonnage: 8.04mt</p> <p>Tayor Estate  Date: 18/8/2018,  Ticket No# 60366,  Field :96,  Tonnage: 7.40mt</p>	Yes

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		<p>Jerangau Estate  Date: 9/8/2018,  Ticket No# 1353,  Field :91A2  Tonnage: 31.98mt</p> <p>Pinang Emas Estate  Date: 7/7/2018,  Ticket No# 20699,  Field :96A2  Tonnage: 31.18mt</p>	
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The management has inform CB on overproduction of certified tonnage. They aware on the overproduction as per stated in the procedure.	Yes
<b>E.5 Record keeping</b>			
E.5.1	a. The site 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 by RSPO.	<p>Sg Tong POM sold CPO and PK as RSPO certified (MB) for the period of Sep 17 – Sep 18. Sample the weighbridge ticket/docket note as below:</p> <p>Buyer: XXXX  Contract No: PO180513 dated 18/5/2018  Quantity: 500 MT  Product: CSPO (MB)  Docket No: S0037120, date:27/5/18  Quantity: 29.24mt  Lorry No: TAJ3778  Certificate No:RSPO595564</p> <p>Buyer: XXXX  Contract No: PO180514 dated 18/5/2018  Quantity: 500 MT  Product: CSPO (MB)  Docket No: S0037188, date:31/5/18  Quantity: 34.86mt  Lorry No: TS8439  Certificate No:RSPO595564</p> <p>Buyer: XXXX  Contract No: PO180502 dated 21/3/2018  Transaction ID:  Quantity: 160 MT  Product: CSPO (MB)  Docket No: S0036764, date:6/5/18  Quantity: 42.42 mt  Lorry No: BLS2077  Certificate No:RSPO595564</p>	Yes

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		<p>Buyer: XXXX  Contract No: PO180503 dated 17/4/2018  Transaction ID:  Quantity: 160 MT  Product: CSPO (MB)  Docket No: S0036905, date:17/5/18  Quantity: 40.89mt  Lorry No: BMN2077  Certificate No:RSPO595564</p> <p>Buyer: XXXX  Contract No: PK180502 dated 28/4/2018  Transaction ID:  Quantity: 540 MT  Product: CSPK (MB)  Docket No: S0037346, date:10/6/18  Quantity: 24.58mt  Lorry No: MBY7940  Certificate No:RSPO595564</p>	
	b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated	Computerized system in place with the delivery deducted accordingly.	Yes
	c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C.	The Mill aware that only positive stock can be delivered. No short selling.	Yes
E.5.2	In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement	No outsourcing activities.	Yes

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**Supply Chain Declaration** *(Applicable For Appendix E)*

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	September 2017	19,846.34	-	19,846.34
2	October 2017	24,901.67	-	24,901.67
3	November 2017	21,815.22	-	21,815.22
4	December 2017	18,104.86	-	18,104.86
5	January 2018	18,300.82	-	18,300.82
6	February 2018	13,698.69	-	13,698.69
7	March 2018	13,997.08	239.42	14,236.50
8	April 2018	13,216.08	397.72	13,613.80
9	May 2018	10,841.22	267.14	11,108.36
10	June 2018	8,384.45	379.00	8,763.45
11	July 2018	8,034.15	373.08	8,407.23
12	August 2018	7,389.36	209.86	7,599.22
13	September 2018	9,940.65	95.38	10,036.03
	<b>Total</b>	<b>188,470.59</b>	<b>1,961.60</b>	<b>190,432.19</b>



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<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	September 2017	3,592.04	922.62
2	October 2017	4,778.71	1,241.95
3	November 2017	4,004.52	1,102.51
4	December 2017	2,903.27	831.74
5	January 2018	3,173.51	797.64
6	February 2018	2,547.64	632.66
7	March 2018	2,740.16	685.00
8	April 2018	2,552.64	645.41
9	May 2018	2,303.17	514.37
10	June 2018	1,652.82	359.68
11	July 2018	1,554.03	326.25
12	August 2018	1,504.25	298.00
13	September 2018	2,014.60	397.45
	Total	35,321.36	8,755.28

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<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading License Number</b>	<b>Certified CPO Sold (mt)</b>	<b>Certified PK Sold (mt)</b>
1	XXX	TR-586d4761-675b	500.00	
2	XXX	TR-009f77cb-72cb	1,471.19	
3	XXX	TR-24a635ef-4fe2	200.00	
4	XXX	TR-8ad4bc0f-f46e	79.00	
5	XXX	TR-6db11f06-fcee	1,504.19	
6	XXX	TR-b8440f31-2b13	106.00	
7	XXX	TR-abea017e-a4be	1,514.91	
8	XXX	TR-20c27fc4-323b	538.65	
9	XXX	TR-9b88cb47-a0fb	40.72	
10	XXX	TR-bd86e96c-ac57	161.02	
11	XXX	TR-661426fb-9450	40.93	
12	XXX	TR-7fcd81f3-528d	160.00	
13	XXX	TR-d85e10a4-9c04	164.22	
14	XXX	TR-bc29b4bc-353e	500.00	
15	XXX	TR-ff3bb1c5-95b7	501.66	
16	XXX	TR-7a6fc474-3b91	42.06	
17	XXX	TR-913aef5-cd28	243.83	
18	XXX	TR-4df1b2dd-3491	1,000.00	
19	XXX	TR-ff3fd2c3-121a	504.74	
20	XXX	TR-e07f362d-3013	500.00	
21	XXX	TR-fcdc9a20-cd74	80.00	
22	XXX	TR-024f54c8-682d	300.00	
23	XXX	TR-2ccb68c8-f87c	320.00	
24	XXX	TR-c2f32c80-05ac		500.00
25	XXX	TR-5504ba91-00c6		500.00
26	XXX	TR-f1270c76-434c		500.00
27	XXX	TR-f8b8c542-1390		450.00
28	XXX	TR-bcd45feb-dc6d		500.00
29	XXX	TR-a08909a2-bf8a		215.00
30	XXX	TR-c8c52515-bf6a		200.00
31	XXX	TR-883165b5-7a4b		215.00
32	XXX	TR-a4c62647-2a5f		560.00
33	XXX	TR-5a69b93f-99d2		280.00
34	XXX	TR-44389d27-2903		260.00
35	XXX	TR-2c22cbac-7c12		860.00
<b>TOTAL</b>			<b>10,473.12</b>	<b>5,040.00</b>

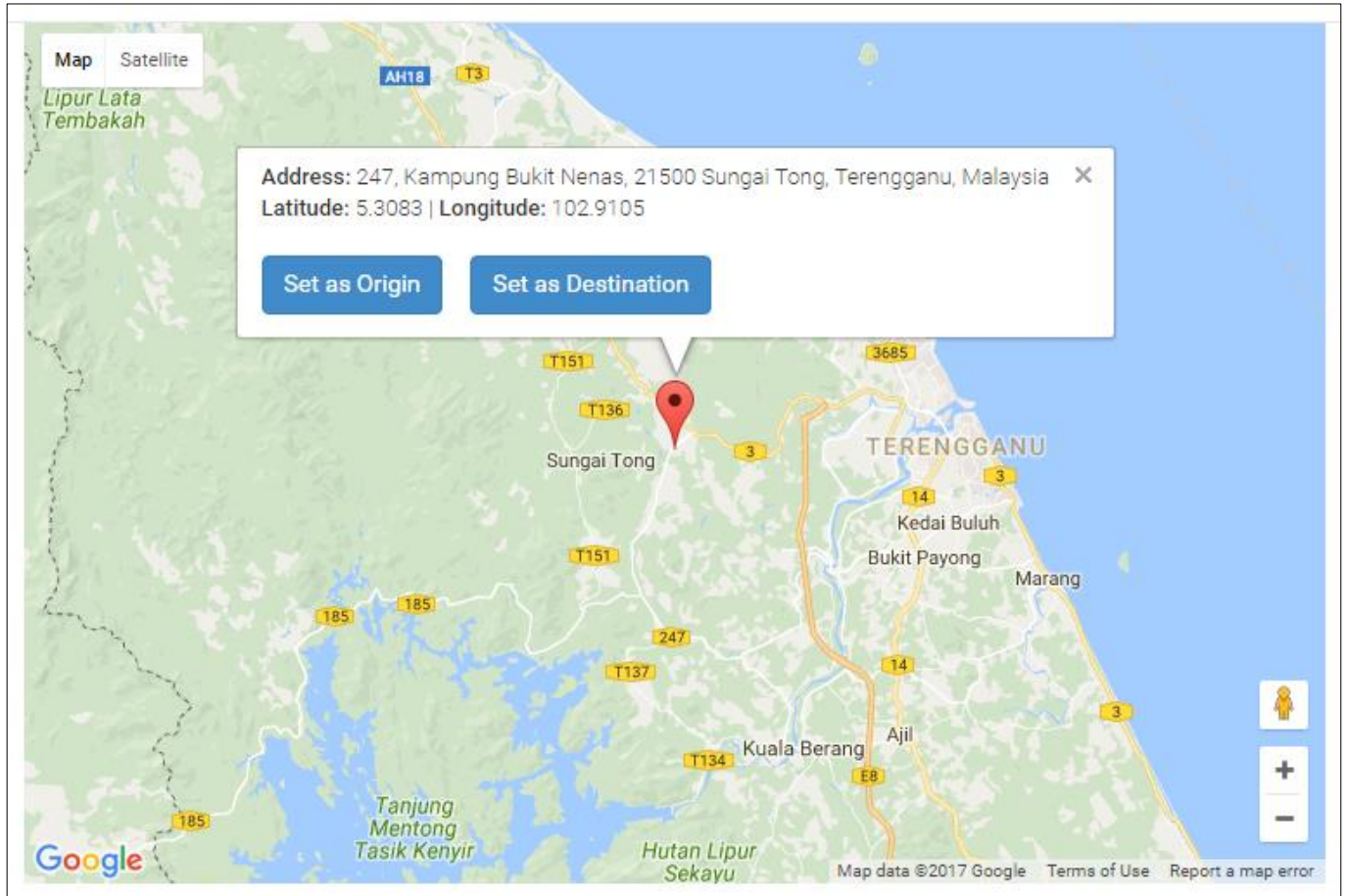
<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Scheme Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
N/A				

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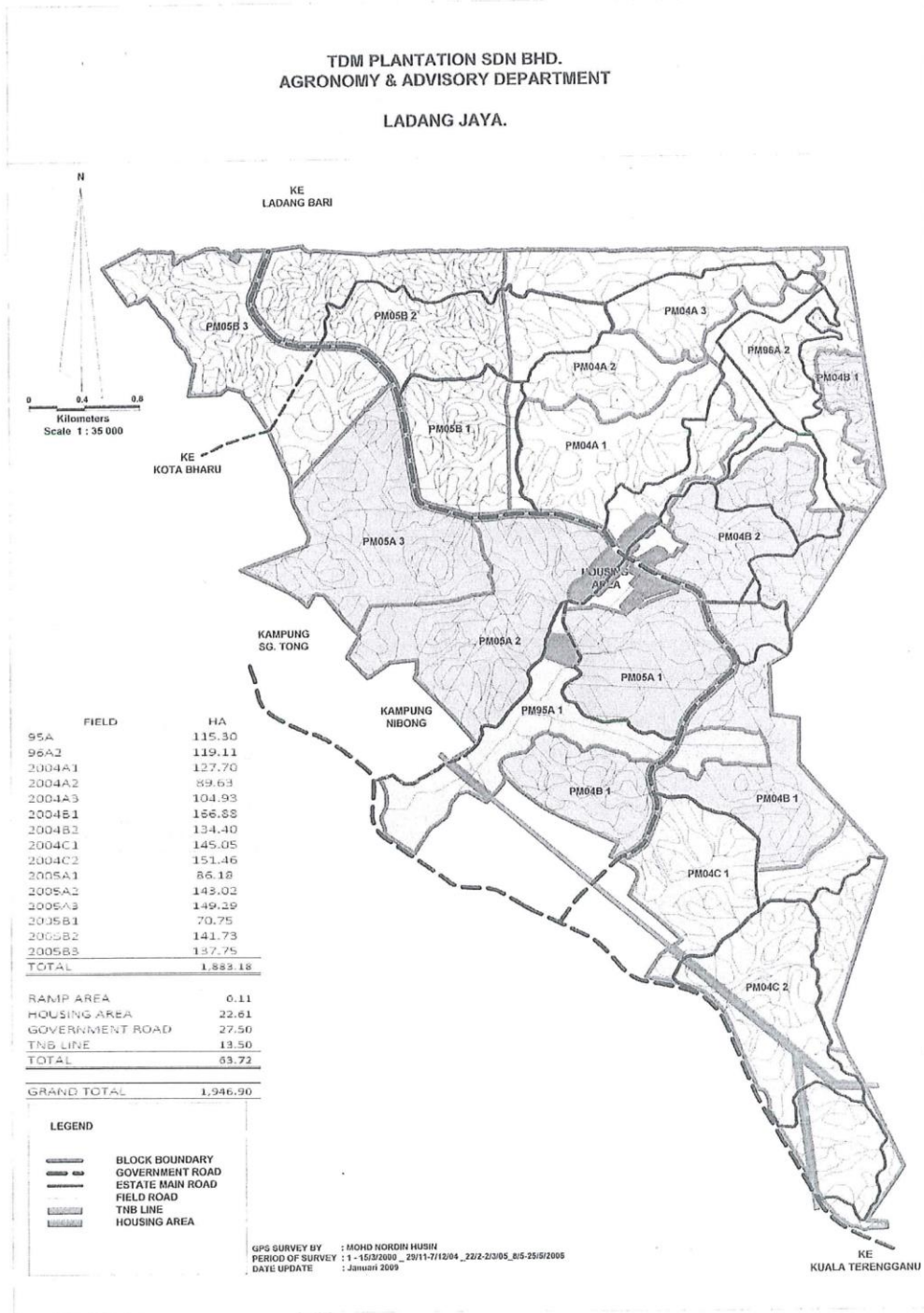
<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
1	XXXX	7,868.60	
2	XXXX	3,639.68	
3	XXXX	3,342.74	
4	XXXX	635.98	
5	XXXX	1,848.14	
6	XXXX	4,618.96	
7	XXXX	1,832.90	
8	XXXX	512.13	
9	XXXX	306.82	
10	XXXX		2,321.61
11	XXXX		522.79
12	XXXX		700.49
TOTAL		24,605.95	3,544.89

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

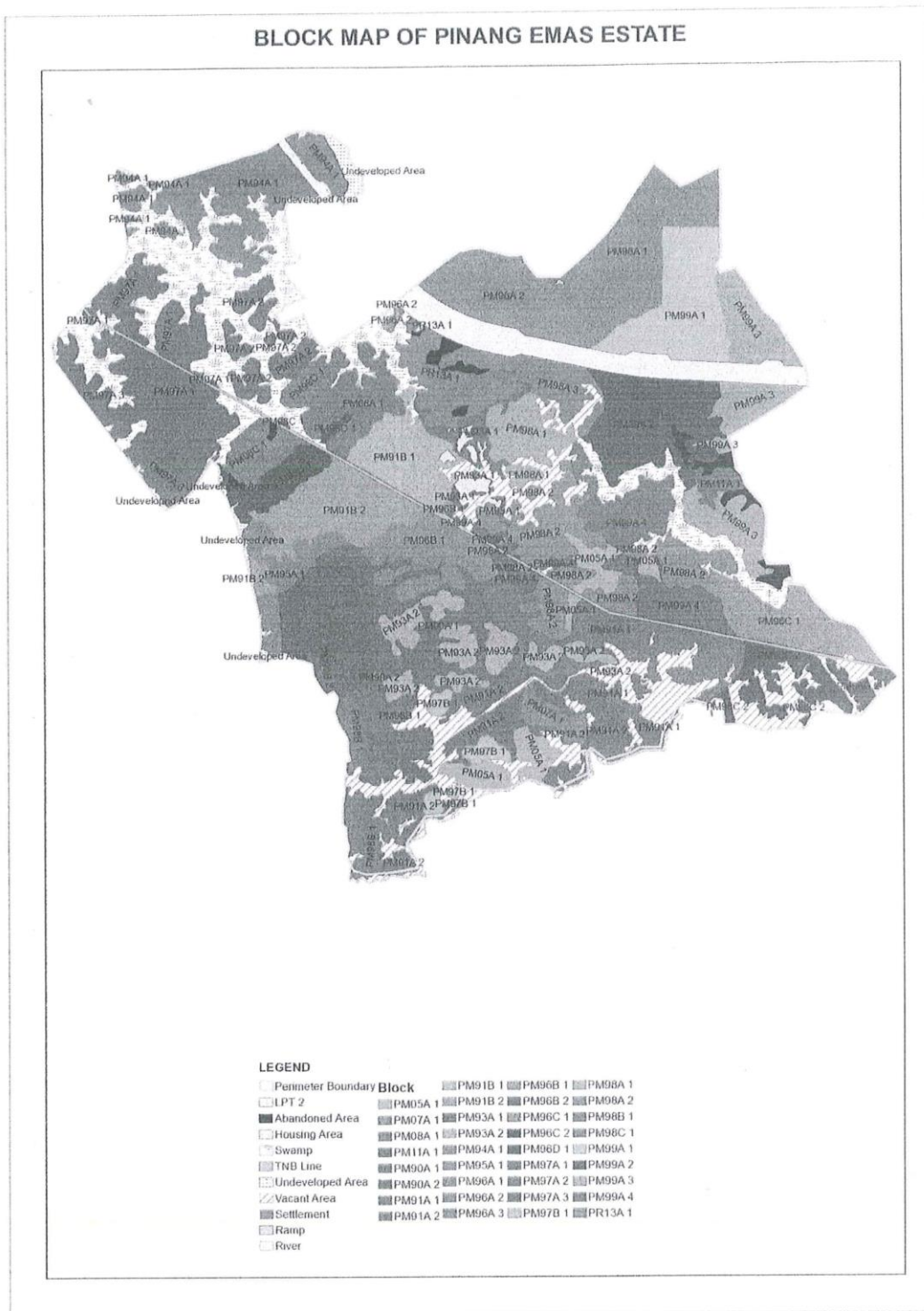
**Appendix F: Location Map of Sungai Tong Certification Unit and Supply bases**



**Appendix G: Jaya Estate Field Map**



Appendix H: Pinang Emas Estate Field Map



AEROMAP SIN BERU

**Appendix I: List of Smallholder Sampled** *(If applicable – scheme/associated/group certification)*

Not applicable

## Appendix J: List of Abbreviations

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