

**RSPO PRINCIPLE AND CRITERIA –
2nd ANNUAL SURVEILLANCE ASSESSMENT (ASA1_2)
Public Summary Report**

Sime Darby Plantation Berhad
Head Office: Level 3A, Main Block, Plantation Tower No. 2, Jalan P.J.U 1A/7 47301 Ara Damansara Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 3) Elphil Palm Oil Mill Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput Perak, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	06/09/2004
Parent Company Name	Sime Darby Plantation Berhad		
Address	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia		
Subsidiary	Strategic Operating Unit (SOU 3) – Elphil Palm Oil Mill		
Address	Elphil Palm Oil Mill, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia		
Contact Name	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr Azman Talkah (Mill Manager)		
Website	www.simedarbyplantation.com	E-mail	shylaja.vasudevan@simedarbyplantation.com kks.elphil@simedarby.com
Telephone	+603-78484379 (Head Office) +603 5940178 (Mill)	Facsimile	+603 78484363 (Head Office) +603 5940167 (Mill)

2. Certification Information			
Certificate Number	RSPO 550181	Date of First Certification	18/06/2011
		Certificate Start Date	18/06/2016
		Certificate Expiry Date	17/06/2021
Scope of Certification	Palm oil and Palm Kernel Production from Elphil Palm Oil Mill and Supply Base (Elphil Estate, Kamuning Estate, Kinta Kellas Estate)		
Applicable Standards	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
BVC-MSPO-0015	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	Bureau Veritas Certification (Malaysia) Sdn Bhd	24/03/2023
BVC-MSPO-0014	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		

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4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Elphil Palm Oil Mill	Elphil Palm Oil Mill, Jalna Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak	4° 53' 24"	101° 5' 37"
Elphil Estate	Ladang Elphil, Jalan Lintang 31100 Sungai Siput, Perak	4° 53' 24"	101° 5' 37"
Kamuning Estate	Ladang Kamuning/Chnagkat Salka 31100 Sungai Siput, Perak	4° 50' 41"	101° 3' 35"
Kinta Kellas Estate	Ladang Kinta Kellas, PO Box 31007 Batu Gajah, Perak	4° 28' 00"	101° 4' 59"

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Elphil Estate	1,676.00	26.43	173.57	1,876.00	88
Kamuning Estate	2,846.00	84.59	958.41	3,889.00	92
Kinta Kellas Estate	950.00	3.69	107.31	1,061.00	91
Total	5,472.00	114.71	1,239.29	6,826.00	90

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Elphil Estate	284.99	234.86	895.84	200.45	59.86	1,391.01	284.99
Kamuning Estate	359.00	259.00	2,209	19.00	-	2,487.00	359.00
Kinta Kellas Estate	164.02	211.66	574.32	-	-	785.98	164.02
Total (ha)	808.01	705.52	3,679.16	219.45	59.86	4,663.99	808.01

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7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (March 2017-Feb 2018)	Actual (March 2017-Feb 2018)	Forecast (March 2018-Feb 2019)
Elphil Estate	34,217.00	41,840.85	31,435.00
Kamuning Estate	46,300.00	40,527.45	44,100.00
Kinta Kellas Estate	16,706.98	16,967.10	16,550.00
Total	97,223.98	99,335.40	92,085.00

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (March 2017-Feb 2018)	Actual (March 2017-Feb 2018)	Forecast (March 2018-Feb 2019)
Chersonese Estate	N/A	82.60	N/A
Kalumpong Estate		977.49	
-		-	
Total		1,060.09	

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (March 2017-Feb 2018)	Actual (March 2017-Feb 2018)	Forecast (March 2018-Feb 2019)
Tang Tatt	Not available	65,094.09	70,000.00
Eng Huat Latex	Not available	25,130.03	30,000.00
Ladang Jalong	Not available	265.29	500.00
Total	-	90,489.41	100,500.00

10. Certified Tonnage				
Mill Capacity: 45 MT/hr SCC Model: MB	Estimated (March 2017-Feb 2018)	Actual (March 2017-Feb 2018)	Forecast (March 2018-Feb 2019)	
	FFB	FFB	FFB	
		137,296.65*	100,395.49	92,085
	CPO (OER: 20.71 %)	CPO (OER: 20.53 %)	CPO (OER: 21.00 %)	
	28,362.01*	20,611.19	19,337.85	

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	PK (KER: 5.48 %)	PK (KER:5.77 %)	PK (KER: 5.50%)
	7,425.12*	5,792.82	5,064.68

* Volume Extension of 40,072.67 mt certified FFB (CSPO : 8,226.92 mt, CSPK: 2,099.60 mt) based palmtrace approved date 7/3/18

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	-	-	-	20,111.19	20,111.19

*4000mt Sold as RSPO credits. Refer to Supply Chain Declaration – Table F.

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	470	-	-	5,322.82	5,792.82

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	n/a	
IS-CSPKO	n/a	
IS-CSPKE	n/a	

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: RSPO-ACC-067)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Singapore, Jakarta, Bangkok and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site surveillance assessment was conducted from 13 – 15/03/2018. 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 (Elphil & Kamuning Estate). 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 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 & Criteria 2013 (MYNI-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.

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 estates sample were determined based on formula $N = 0.8\sqrt{y}$ where y is the number of estates (*Note: This is applicable until 30th June 2018*).
- 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 (*Note: This is applicable starting from 1st July 2018*).
- 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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Elphil Palm Oil Mill	√	√	√	√	√
Elphil Estate		√	√	√	√
Kamuning Estate	√		√	√	√
Kinta Kellas Estate	√	√	√	√	√

Tentative Date of Next Visit: March 13, 2019 – March 15, 2019

Total No. of Mandays: 12 mandays

2.2 BSI Assessment Team:

Team Member Name	Role	Qualification
Mohamed Hihdir	Lead auditor	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers & stakeholders consultation.
Valence Shem (VS)	Team member	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.
Hu Ning Shing (HNS)	Team member	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya in year 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 his 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.

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Accompanying Persons:

No.	Name	Role
	N/A	

2.3 Assessment Plan

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

PRELIMINARY AGENDA					
Date	Time	Subjects	Mohd Hidhir	Ning Shing	Valence
Monday 12/3/2018	PM	Audit Team travelling to Ipoh. Check-in at MH Hotel, Ipoh	√	√	√
Tuesday 13/3/2018 Elphil Palm Oil Mill	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). Verification on previous audit findings 	√	√	√
	09.00 – 12.00	Elphil Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.30	Elphil Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	16.30-17.00	Interim Closing briefing.	√	√	√
Wednesday 14/3/2018 Kamuning Estate	08.30 – 12.00	Kamuning Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	09.00 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.30	Kamuning Estate 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).	√	√	√

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PRELIMINARY AGENDA					
Date	Time	Subjects	Mohd Hidhir	Ning Shing	Valence
	16.30-17.00	Interim Closing Briefing	√	√	√
Thursday 15/3/2018	8.30 – 13.00	Elphil Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
Elphil Estate	13.00 – 14.30	Lunch and Friday Prayer	√	√	√
	14.30 – 16.30	Elphil Estate 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).	√	√	√
	16.30-17.30	Prepare for closing meeting Closing Meeting Trevelling back to KL	√	√	√

Section 3: Assessment Findings

3.1 Details of audit results are provided in the following Appendix:

- Sime Darby Plantation Berhad Time Bound Plan
- RSPO Supply Chain Certification Checklist June 2017
- RSPO P&C MY-NIWG 2014 Checklist

3.2 Progress against Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	The time bound plan includes all SOUs in Malaysia and Indonesia. Malaysia- Effectively 34 SOUs: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. Indonesia- Effectively 25 SOUs. For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 st quarter of 2019.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 st quarter of 2019.	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	Sime Darby Plantation's time bound plan for certification is initially 3 years, starting 2008 – 2011. SDP has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets). The 2 new mills have been RSPO Certified in Jan and Feb 2014. For Indonesian operations, currently, 1 SOU in Indonesia (PT MAS) is pending for RSPO Certification due to social legacy issues. SDP's is actively working on its certification targets given the span across a large geographical location and over 200 estates and mills in operation.	Yes
Have there been any changes since the last audit? Are they justified?	97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes and a new oil mill in Liberia has been commissioned in Feb 2016. SDP's time bound plan has been revised to take into consideration the social challenges encountered in Indonesia for the remaining SOU (PT MAS) yet to be certified. Sime Darby Plantation will proceed with the next steps of certification upon	Yes

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	<p>satisfactory resolution of the matter.</p> <p>For Indonesia operation, the reported Case No: DSF 007 between the parties PT Mistra Austral Sejahtera (a subsidiary of Sime Darby Plantation Sdn Bhd) and Kerunang/Entapang community. New status has been updated for dispute tracker for following case, http://www.rspo.org/members/dispute-settlement-facility/status-of-disputes#007.</p>	
<p>If there have been changes, what circumstances have occurred?</p>	<p>Indonesia- PT MAS has undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO for Partial Certification and the report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. Ongoing and regular (bi-monthly) discussions is ongoing between Sime Darby Plantation and the project affected communities. Reports on the progress update are submitted to RSPO on a regular basis since November 2012. The latest progress report submitted to RPSO dated 30th June 2016.</p> <p>Smallholders- As at June 2016, total of 24,820 Ha (59%) of total Ha, (42,008 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholders areas is ongoing. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2019.</p> <p>Liberia- A new mill to be set up in Liberia and planned for commissioning in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audt was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1st quarter of 2019. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps completed.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>Up to date, there is no comment.</p> <p>SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.</p>	<p>Yes</p>
<p>Have there been any newly acquired subsidiaries?</p>	<p>In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.</p> <p>A new mill has been set up in Liberia and planned for commissioning in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. *RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in completed. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audt was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1st quarter of 2019.</p>	<p>Yes</p>
<p>If yes, have the newly acquisitions certified within a</p>	<p>A new mill has been set up in Liberia and planned for commissioning in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audt was premature</p>	

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three-year timeframe?	terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 st quarter of 2019.. *RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in completed..	
Have there been any isolated lapses in implementation of the plan?	No lapses.	Yes
Un-Certified Units or Holdings		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).	Yes
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audt was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1st quarter of 2019. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p> <p>*Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</p>	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	Latest update based on RSPO Case Tracker (19 potential liabilities; 5 LUCA submitted, 1 LUCA is passed, 1 CN submitted, 1 CN approved) on LUCA submission stauts as per below table:	Yes

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<p>2.2, 6.4, 7.5 and 7.6.</p>	<p style="text-align: center;"><u>SIME DARBY PLANTATION: LUCA SUBMISSION TIMELINE</u></p> <table border="1" data-bbox="424 454 1259 1160"> <thead> <tr> <th>No.</th> <th>PT/ Company</th> <th>Report Submission to RSPO</th> <th>Current Status (14 Aug 2018)</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>PT Lahan Tani Sakti</td> <td>Submitted on 31 May 2017</td> <td>LUCA approved by reviewer</td> </tr> <tr> <td>2.</td> <td>PT Bina Sains Cemerlang</td> <td>Submitted on 29 Sept 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>3.</td> <td>PT Swadaya Andika</td> <td>Submitted on 6 Oct 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>4.</td> <td>PT Langgeng Muara Makmur</td> <td>Submitted on 8 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>5.</td> <td>PT Laguna Mandiri</td> <td>Submitted on 20 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>6.</td> <td>PT Kridatama Lancar</td> <td>Submitted on 22 Sept 2017</td> <td rowspan="13" style="vertical-align: middle;">Shapefiles to be submitted to RSPO by 17 Aug 2018</td> </tr> <tr> <td>7.</td> <td>PT Paripurna Swakarsa</td> <td>Submitted on 29 Sept 2017</td> </tr> <tr> <td>8.</td> <td>PT Sime Indo Agro</td> <td>Submitted on 10 Nov 2017</td> </tr> <tr> <td>9.</td> <td>PT Bhumireksa Nusa Sejati</td> <td>Submitted on 12 Dec 2017</td> </tr> <tr> <td>10.</td> <td>PT Budidaya Agro Lestari</td> <td>Submitted on 15 Dec 2017 <i>*Re-submitted on 29 Dec 2017</i></td> </tr> <tr> <td>11.</td> <td>PT Teguh Sempurna</td> <td>Submitted on 15 Dec 2017 <i>*Re-submitted on 29 Dec 2017</i></td> </tr> <tr> <td>12.</td> <td>PT Bahari Gembira Ria</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>13.</td> <td>PT Guthrie Pecconina Indonesia</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>14.</td> <td>PT Sajang Heulang</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>15.</td> <td>PT Bersama Sejahtera Sakti</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>16.</td> <td>PT Tunggal Mitra Plantation</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>17.</td> <td>PT Ladangrumpun Suburabadi</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>18.</td> <td>PT Aneka Inti Persada</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>19.</td> <td>PT Mitra Austral Sejahtera</td> <td>Submitted on 29 Dec 2017</td> </tr> </tbody> </table> <p>Note: SDP's LUCA is still in queue for review process pending finalization of the contract between RSPO and the reviewer. Sime Darby Plantation has also submitted its RSPO Compensation Plan (CP) for evaluation by RSPO.</p>	No.	PT/ Company	Report Submission to RSPO	Current Status (14 Aug 2018)	1.	PT Lahan Tani Sakti	Submitted on 31 May 2017	LUCA approved by reviewer	2.	PT Bina Sains Cemerlang	Submitted on 29 Sept 2017	Shapefiles submitted to RSPO	3.	PT Swadaya Andika	Submitted on 6 Oct 2017	Shapefiles submitted to RSPO	4.	PT Langgeng Muara Makmur	Submitted on 8 Dec 2017	Shapefiles submitted to RSPO	5.	PT Laguna Mandiri	Submitted on 20 Dec 2017	Shapefiles submitted to RSPO	6.	PT Kridatama Lancar	Submitted on 22 Sept 2017	Shapefiles to be submitted to RSPO by 17 Aug 2018	7.	PT Paripurna Swakarsa	Submitted on 29 Sept 2017	8.	PT Sime Indo Agro	Submitted on 10 Nov 2017	9.	PT Bhumireksa Nusa Sejati	Submitted on 12 Dec 2017	10.	PT Budidaya Agro Lestari	Submitted on 15 Dec 2017 <i>*Re-submitted on 29 Dec 2017</i>	11.	PT Teguh Sempurna	Submitted on 15 Dec 2017 <i>*Re-submitted on 29 Dec 2017</i>	12.	PT Bahari Gembira Ria	Submitted on 29 Dec 2017	13.	PT Guthrie Pecconina Indonesia	Submitted on 29 Dec 2017	14.	PT Sajang Heulang	Submitted on 29 Dec 2017	15.	PT Bersama Sejahtera Sakti	Submitted on 29 Dec 2017	16.	PT Tunggal Mitra Plantation	Submitted on 29 Dec 2017	17.	PT Ladangrumpun Suburabadi	Submitted on 29 Dec 2017	18.	PT Aneka Inti Persada	Submitted on 29 Dec 2017	19.	PT Mitra Austral Sejahtera	Submitted on 29 Dec 2017	
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<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p>	<p>No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Did the company conduct an internal audit? If so, has a positive</p>	<p>Yes</p>	<p>Yes</p>																																																																			

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assurance statement been produced?		
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3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	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 one (1) Major & three (3) Minor nonconformities raised. The Elphil 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 it effectiveness and closed accordingly.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1606941-201802-M1	Clause & Category (Major/Minor)	SCCS E.5.1 Major
Date Issued	15/03/2018	Due Date	14/05/2018
Closed (Yes/No)	Yes	Date of nonconformity closure	14/5/2018
Statement of Nonconformity	The delivery/dispatch of RSPO certified PK from the mill was more than the available stock.		
Requirement Reference	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.		

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Objective Evidence	Based on the quarterly record and balance (RSPO records for oil mills) for year 2017, the following were found: First quarter – delivery/dispatch of RSPO certified PK was 16% more than stock Third quarter – delivery/dispatch of RSPO certified PK was 2% more than stock
Corrections	To include the proportion of certified (MB) and non-certified PK volume in the mass balance accounting sheet and to communicate with GTM regularly to ensure that no negative deliveries within a three-monthly inventory period.
Root Cause Analysis	The mass balance template does not clearly calculate the production of Mass Balance palm kernel, but only states the total production of PK (conventional and MB) for monitoring of mass balance accounting resulted in no visibility in the mass balance palm kernel production and the corresponding delivery for proper monitoring.
Corrective Action	To ensure consistent implementation of mass new balance sheet, monthly check on SCC requirement will conducted by onsite PSQM representative. The SCC component will be incorporated in the monthly PSQM-ESH report to HQ.
Assessment Conclusion	<p>The nature of NC is non-process related which can be verified with documented evidence. A new mass balance sheet is developed to monitor RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and/or three-monthly basis based on the resolution from meeting with GTM and PQSM department with regards to RSPO Mass Balance Accounting Matters dated 25/4/18. The new mass balance sheet has included carry forward stock to ensure no overselling of stocks (CPO and PK) for every 3 monthly period.</p> <p>Consistent implementation is checked based on quarterly SCC audit on the new monitoring mass balance sheet. Refer PSQM-ESH May 2018 report. Based on the report, no negative stock recorded as per todate May 2018 stock.</p> <p>The corrective action was effectively closed on 14/5/18. Continuous implemented will be further verified in the next assessment.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1606941-201802-N1	Clause & Category (Major/Minor)	Indicator 6.8.3 Minor
Date Issued	15/03/2018	Due Date	Next Annual Surveillance Assessment
Closed (Yes/No)	Yes	Date of nonconformity closure	N/A
Statement of Nonconformity	The process of recruitment in origin country by the agents was not clear to ensure it complies with Sime Darby Plantations Berhad's procedure.		
Requirement Reference	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.		
Objective Evidence	It is stated in the employment contract that all the transportation cost, permit, levy and passport fee will be beared by the company. Cross-checking with the management have confirmed that they have paid all the cost and verified in the New Workers Allocation Cost summary, where agent fee, air fare cost and etc were beared by the company. However during interviews with some of the		

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	workers in Elphil Estate (Employee No.: 132419, 138361, 137762 and 132414) from India and Indonesia, it is found that they paid an amount of money (RM 1000 – 4000) to the agents for passport, permit, transportation cost and etc. Thus, the process of recruitment in origin country by the agent was not clear to ensure they follow to the Workforce Management Unit Liaison & Recruitment (LR) Procedure where the worker do not require to pay any cost for the recruitment as it paid by the company.
Corrections	To include the information on the above in the induction programme at the Operating Unit for new recruits, as well as awareness programme for the existing workers.
Root Cause Analysis	<p>Lack of awareness among workers on the cost borne by the company</p> <p>In the Employment contract, for Employment Cost, it is specified that SDP will bear the cost of levy, Pas Lawatan Kerja Sementara, FOMEMA medical examination and Visa.</p> <p>In the Employment contract, for Transportation Cost, it is specified that SDP will bear the cost of flight ticket from country of origin to Malaysia and the cost of return to home country of origin when the Fixed Term or Extended Term expires excluding:-</p> <ol style="list-style-type: none"> 1. Cost of documentation inclusive ID and Passport 2. Local transportation for interview, documentation preparation and airport transfer inclusive hostel and meal 3. Sub Agent fees – the party that recruit them form their village.
Corrective Action	To include the information on the above during the recruitment of workers at source country by Workers' Management Unit (WMU)
Assessment Conclusion	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1606941-201802-N2	Clause & Category (Major/Minor)	Indicator 5.1.2 Minor
Date Issued	15/03/2018	Due Date	Next Annual Surveillance Assessment
Closed (Yes/No)	No	Date of nonconformity closure	N/A
Statement of Nonconformity	A comprehensive management plan with timetable for change was not developed and effectively implemented.		
Requirement Reference	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.		
Objective Evidence	Environmental management plan @ pollution preventive plan for 2018 did not		

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	include significant environmental impact mitigation for: Noise pollution – noise boundary monitoring plan POME solid waste disposal – geo-tube and conventional method of disposal Air emission – Compliance toward Clean Air Regulation 2014. Fire incident – fire incident caused by stakeholder.
Corrections	Review the EAI and EIE
Root Cause Analysis	Lack of supervise by competent person during evaluation and some activity is still new(trial or discuss period) to the operation
Corrective Action	To train periodically and evaluate the competency of trainee.
Assessment Conclusion	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1606941-201802-N3	Clause & Category (Major/Minor)	Indicator 5.6.1 Minor
Date Issued	15/03/2018	Due Date	Next Annual Surveillance Assessment
Closed (Yes/No)	No	Date of nonconformity closure	N/A
Statement of Nonconformity	Monitoring system with reporting on progress for these significant pollutants and emissions from estate and mill operations was not regularly updated.		
Requirement Reference	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.		
Objective Evidence	Elphil POM Management Unit Palm GHG for 2017 was not made available for verification during audit.		
Corrections	To calculate the PalmGHG based on database collection from HQ		
Root Cause Analysis	Due to extracting all data from various system at HQ requires long time.		
Corrective Action	To ensure the timeline of PalmGHG submission is according to external audit date		
Assessment Conclusion	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description

PF 1	Good positive feedback received from internal and external stakeholders
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3.4.1 Status of Nonconformities Previously Identified and Observations

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1453612-201703-M1	Clause & Category (Major/Minor)	Indicator 4.7.1 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	09/05/2017
Statement of Nonconformity	Health and safety plan was not effectively implemented.		
Requirement Reference	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.		
Objective Evidence	<p>Elphil POM</p> <ul style="list-style-type: none"> i) Medical surveillance record was not available for contractor (Kejuruteraan Serting). As a workshop fitter, the worker is exposed to manganese fumes during welding works. ii) Annual audiometric testing dated 16/6/17 did not include contractor's workers under (Kejuruteraan Serting) for baseline audiometric. iii) Contractor management <ul style="list-style-type: none"> - PTW was not issued for the sub-contractor of Sime Darby Industrial (Tye Chong Engineering), only gate pass available dated 21/3/17 - Health declaration records was not available for the authorized entrant (AE) under Dynamecea based on PTW records dated 21/3/17 - Flashback arrestor was not installed/used by the contractor, Tye Chong Engineering. No proper check prior to entry for the contractor. 		
Corrective Action	<p>Elphil POM:</p> <ul style="list-style-type: none"> i. Medical surveillance will be done to the workshop fitter that is exposed to manganese fumes during welding works either local or contractor. The medical surveillance will be kept as record for reference. One of the contract worker under Kejuruteraan Serting has been sent for medical surveillance to the panel clinics on 27/03/2017 and is waiting for report. ii. Annual audiometric testing will include all of the contractor's workers for baseline audiometric for next testing. iii. Contractor management <ul style="list-style-type: none"> - PTW will be given to all contractors before commencement of any work. Auxiliary Police is responsible to inform all contractor to request work permit from person in-charge prior to the commencement of any work. Person in-charge for work permit to issue and get approval before commencement of any work. - Health declaration records for the authorized entrant (AE) will be attached together with PTW Confined Space. - To proper check all safety equipment for the contractor prior to entry. All instructions will be given together with the permit to work. <p>New checklist (contractor checklist) use during kick off meeting to ensure all legal and compliance are met before they start working.</p>		
Assessment Conclusion	ASA1_2 verification		

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	<ul style="list-style-type: none"> i) Medical surveillance report for contractor’s worker, BL 0333464, date of monitoring – 8/3/18 under Klinik Tweedie Baseline audiometric – 12/3/18 under Klinik Tweedie ii) Contractor management - PTW for CS has been practiced. Health declaration status recorded in the permit. All necessary PPE and tools check prior to entry by AGT. - PPE and tools check will be done prior to entry by security personnel. Permit to work will be issued before they start work and will be monitored by mill appointed personnel. i) Medical surveillance report for contractor’s worker, BL 0333464 Date of monitoring – 8/3/18 (date joined) under Klinik Tweedie ii) Baseline audiometric – 12/3/18 under Klinik Tweedie iii) Permit to work – Confined space and other general works <p>Annual medical surveillance - 20/9/17 for manganese and hexane exposure for 11 workers from workshop and laboratory under Klinik Tweedie, OHD reg. no. HQ/11/DOC/00/200 No recurrence of issues noted. Thus, the previous NC is remained closed.</p>
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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1453612-201703-M2	Clause & Category (Major/Minor)	Indicator 4.7.2 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	09/05/2017
Statement of Nonconformity	All operations where health and safety was not comprehensively risk assessed, and procedures and actions was not effectively implemented to address the identified issues.		
Requirement Reference	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.		
Objective Evidence	HIRARC register did not cover the following activities: <ul style="list-style-type: none"> i) Boiler repair and service ii) Excavation works iii) Working at height iv) Revised HIRARC after accident occurrence dated 14/6/16 with 79 days LTI. The related corrective action and mitigation plan @ risk control was not clearly identified and implemented. 		
Corrective Action	HIRARC has been updated and incorporated as per listed no (i), (ii), and (iii). Revised HIRARC as stated no (iv) has been updated on 22/03/2017. ESH Risk Management was established to ensure all activities is covered.		
Assessment Conclusion	ASA1_2 verification HIRARC register updated according. For 2017 and 2018, annual review was carried on and some of the revised HIRARC checked: 13/2/18 – Workshop : mechanical bearing replacement activity 5/10/17 – Boiler : walking and cleaning the area 9/8/17 – Control panel MCC – checking/operating 2/8/17 – Fruit handling and maintenance 4/7/17 – Sterilizer maintenance No recurrence of issues noted. Thus, the previous Nc is remained closed.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1453612-201703-M3	Clause & Category (Major/Minor)	Indicator 4.7.5 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	09/05/2017
Statement of Nonconformity	Emergency and preparedness was not effectively implemented.		
Requirement Reference	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.		
Objective Evidence	Ephilil POM: i) Expired item (flanil cream) was found in the first aid box located at workshop and engine room. The item was expired on 23/8/16. ii) Some of the items were not present/insufficient i.e hand plaster, eye ointment at workshop and engine room.		
Corrective Action	Elphil POM: i) Expired item (flanil cream) in the first aid box located at workshop and engine room has been replace immediately on 22/3/2017. The action taken will be done immediately after checking. Schedule checking for First Aid Kit has been established. ii) Items that are not present/insufficient will be refilled and made available as per Fourth Schedule in Factory and Machinery Act 1967 (Act139). iii) Re training for all first aider has already been done on March 2017 by HA. The First Aid checklist establish followed as per FMA (16 Item) as generic and apply to all OU.		
Assessment Conclusion	ASA1_2 verification i) First aid inspection report (mill) for 7 boxes recorded under "senarai dan rekod pemeriksaan peti pertolongan cemas". Refer to the latest inspection record dated 12/3/18. No expired first aid box item found in the box. ii) The new nominated competent first aider at POM Muhammad Saiful Hasan (12-13/9/17) valid for 3 years. Hafizul Zakaria (12-13/9/17) valid for 3 years No recurrence of issue noted, thus, the previous NC is remain closed.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1453612-201703-M4	Clause & Category (Major/Minor)	Indicator 4.4.2 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	09/05/2017
Statement of Nonconformity	Riparian buffer zone was not effectively maintained and restored.		

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Requirement Reference	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.
Objective Evidence	i) No demarcation for the buffer zone along the river at block 99G ii) Observed evidence of spraying at the buffer zone area, block 99G
Corrective Action	i. Marking at the end palm along the buffer zone. ii. To put additional signboard of buffer zone/ no spraying beyond this area along the river. Train all new workers and brief them regarding maintaining buffer zone area and ensure to evaluate the worker after training for their level of understanding
Assessment Conclusion	ASA1_2 verification Based on the visits to riparian buffer zone at Kamuning and Elphil estates, it was confirmed that no recurrence of non-conformity. There was no trace of chemical spraying observed and signboards and demarcation to indicate area of the buffer zones were found to be adequate No recurrence of issue noted, thus, the previous NC is remain closed.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1453612-201703-M5	Clause & Category (Major/Minor)	Indicator 5.1.1 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	09/05/2017
Statement of Nonconformity	Registration of Environmental Aspects and Impacts is incomplete.		
Requirement Reference	An environmental impact assessment (EIA) shall be documented.		
Objective Evidence	Following activities' aspect and impacts has not been identified in the POM Registration of Environmental Aspects and Impacts conducted in 14 January 2016 at POM: a. Maintenance of furrow system b. Mini Lab at the ETP c. Composting plant d. Scrapyard in POM e. Pump House f. Construction of the buffer pond is not identified in the POM's Registration of Environmental Aspects and Impacts.		
Corrective Action	The Following activities' aspect and impacts were identified and updated in the POM Registration of Environmental Aspects and Impacts at POM: a. Maintenance of furrow system b. Mini Lab at the ETP c. Composting plant d. Scrapyard in POM e. Pump House f. Construction of the buffer pond. ESH Risk Management has been established to ensure all activities is cover.		
Assessment Conclusion	ASA1_2 veriifcation All the above activities has been incorporated in the register. Additional activities has been included such as BOD polishing plant (EIE/2017/BPP/001) dated 27/3/17 for the 2017 review. No recurrence of issue noted, thus, the previous NC is		

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	remain closed.
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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1453612-201703-M6	Clause & Category (Major/Minor)	Indicator 5.3.2 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	09/05/2017
Statement of Nonconformity	Scheduled waste was not disposed responsibly.		
Requirement Reference	All chemicals and their containers shall be disposed of responsibly.		
Objective Evidence	In Kinta Kellas, schedule waste such as empty containers, used lubricants and oil filter were stored for more than 180 days based on the inventory record. The schedule waste were stored without proper labelling and segregation. Spill kits were not available at the store.		
Corrective Action	To take SS Setia Sdn Bhd, the recycler contractor. All scheduled waste already dispose as recycle waste at SS Setia Sdn Bhd. E-swis to be implemented and monitored by Scheduled waste competent person or SQM to ensure all in place as per legal requirement.		
Assessment Conclusion	ASA1_2 verification Based on the visits at Kamuning and Elphil estates scheduled wastes storage, it was noted that no scheduled waste was being stored more than 180 days. Verification of disposal records showed that all the chemical containers were disposed through SS Setia. Spill kits were also available at the stores.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1453612-201703-M7	Clause & Category (Major/Minor)	Indicator 6.3.1 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	09/05/2017
Statement of Nonconformity	The complaint procedure was not effectively implemented.		
Requirement Reference	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.		
Objective Evidence	Kinta Kellas Estate: Through interviews with the workers, it is found that the understanding of the complaint procedure is not sufficient. For example, owner of House No. 43/79 had complained about his water tank leakage to the Medical Assistant 15 days ago. However, no action has been taken. Besides, site visit to the linesite has found that House No. B7 and B8's toilet door were broken. The owner told that this had happened since they moved into the new housing. She has complained on this matter but unfortunately no action was taken to repair the door. During document review on the complaint book and housing repair book, it is found that the complaints related to the above issues were not lodged into the book. Therefore,		

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	the complaint system was not effectively implemented according to the procedure.
Corrective Action	To brief all the workers and their dependent about the complaint procedure and evaluate the understanding regarding to complaint procedure. Complaint procedures distributed and attached at each of the houses. Contacts and procedures available on the notice.
Assessment Conclusion	ASA1_2 verification: The company has conducted briefing on the complaint procedure and whistle blowing to the workers on 16/10/2017 and 30/10/2017 in Kamuning Estate. Interviewed with the workers and external stakeholders found that they are aware of the complaint procedure and understand the process to lodge complaint. Thus, the non-conformity was remained closed on 15/3/2018.

Summary of Total Number of Nonconformity

Nonconformity

NCR Ref #	1453612-201703-M8	Clause & Category (Major/Minor)	Indicator 6.5.2 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	09/05/2017
Statement of Nonconformity	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.) were not available.		
Requirement Reference	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.		
Objective Evidence	<p>Elphil POM: According to MAPA/NUPW Circular No. 22/2015 dated 4/8/2015, the employer is required to fully subsidize RM 3.00 per month for each of the members of NUPW as premium towards NUPW/AIA Personal Accident Group RM 10.00 for Great Eastern insurance. However, the management has yet to subsidize and deducted RM 11.00 and RM 20.00 from sampled workers below:</p> <ul style="list-style-type: none"> a. Employee No.: 49835 (EPOM) – only AIA Insurance b. Employee No.: 119973 (EPOM) – both AIA & GE c. Employee No.: 114387 (EPOM) – both AIA & GE d. Employee No.: 123480 (EPOM) – both AIA & GE e. Employee No.: 72004 (EPOM) – both AIA & GE f. Employee No.: 123747 (EPOM) – both AIA & GE <p>There are total 11 workers are Union members and 6 of them were not in compliance with the agreement. Composting Plant Contractor: Contract of employment for the total 4 foreign workers were not available.</p>		
Corrective Action	<p>Elphil POM: 1. To brief and create awareness to NUPW members pertaining MAPA/NUPW Circular. The employee is fully subsidize RM 3.00 per month for each of the members of NUPW as premium towards NUPW/AIA Personal Accident Group RM 10.00 for Great Eastern insurance. 2. To establish IOM for Operation to ensure the commitment of deduction NUPW.</p>		

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	<p>3. To train the OU office management and NUPW members on allowance & deduction of NUPW and their roles in implementing the instruction by MAPA thru circular No. 22/2015.</p> <p>4. The region SQM Team and PSQM Team have conducted check on entire workers of SOU Elphil on NUPW deduction and insurance reimbursement. Found total 6 workers of KKS Elphil insurance was not reimburse accordingly.</p> <p>Workers : Ganeshkumar Sukumaran (49835), Isa Ansori (72004), Mohamad Amirul (119973), Hari Dass (123480), Mohamad Ardi (123747) and Mohd Sahil (131717). All over deduction of this workers have been reimbursed on March 2017.</p>
<p>Assessment Conclusion</p>	<p>ASA1_2 verification: Document verified the payslip confirmed that the management has subsidized RM 13.00 for NUPW subscription fee and insurance. Sampled of payslip as below:</p> <ol style="list-style-type: none"> a. Employee No.: 72005 (EPOM) b. Employee No.: 123747 (EPOM) c. Employee No.: 26467 (KE) d. Employee No.: 104171 (KE) e. Employee No.: 91959 (KE) f. Employee No.: 112644 (KE) g. Employee No.: 92485 (KE) h. Employee No.: 115533 (EE) i. Employee No.: 24957 (EE) j. Employee No.: 136375 (EE) <p>Seen the Inter-Office Mail with Ref. No. PSQM/SU/RSPO/ASA/01-2017 dated 27/3/2017 from Head of Upstream to urge the operating unit to comply with the NUPW agreement.</p> <p>Besides, Composting Plant has been shut down and no longer have workers in the plant. However, the company has ensure all the contractor's workers possessed of employment contract.</p> <p>Thus, the non-conformity was remained closed.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1453612-201703-M9	Clause & Category (Major/Minor)	Indicator 2.1.1 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	09/05/2017
Statement of Nonconformity	The contractors did not comply with the Minimum Wage Order 2016 and Immigration Act 1959/63.		
Requirement Reference	Evidence of compliance with relevant legal requirements shall be available.		
Objective Evidence	Composting Plant Contractor: 4 out of 11 local workers' daily rate were found to be less than RM 38.46, which is only RM 37/ day and 1 out of 11 local workers' monthly pay was only RM 850. Kejuruteraan Serting (Contractor): Foreign worker's permit (Passport No.: BC 0761054) was expired on 7/2/2017. No evidence of renewal of permit was carried out.		
Corrective Action	Composting Plant Contractor: 1. To ensure the employment contract will keep by the PCM for all the workers		

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	<p>who are working with PCM.</p> <p>2. To guide the composting plant contractor and ensure regarding to the Min Wage 2016</p> <p>Kejuruteraan Serting (Contractor): Contractor of foreign worker's permit to be monitor together with Elphil POM foreign worker's checklist and keep in the file for record. Foreign worker's permit (Passport No.: BC 0761054) has been submitted for renewal work permit and valid until 7/2/2018.</p>
Assessment Conclusion	<p>ASA1_2 verification: The mill has terminated the service with Kejuruteraan Serting and engaged Maju Mech. The contractor has one worker who work in mill started on 1/3/2018. The worker with Passport No.: BL0333464 and valid working permit No. PD 9185554 which valid until 23/10/2018 was sighted. Besides, employment contract between the contractor and worker was available. Thus, the non-conformity is remained closed.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1453612-201703-N1	Clause & Category (Major/Minor)	Indicator 4.7.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	13/03/2018
Statement of Nonconformity	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.		
Requirement Reference	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.		
Objective Evidence	<p>Elphil POM</p> <p>i) Contractor (Tye Chong Engineering) - PPE used was incomplete. No hand gloves were available.</p> <p>Kinta Kellas Estate</p> <p>i) Manurer & Chemical Store - Non approved respirator was used and not as per SDPSB pictorial safety standard. (3M 3000 series)</p> <p>ii) Observed PPE was not appropriately worn by the manurer as per SDPSB pictorial safety standard.</p>		

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<p>Corrective Action</p>	<p>Elphil POM: i) All contractor will be given briefing about safety and complete with required PPE when issue the permit to work before start to work. ii) To ensure all new worker need to be train and guide during working. Already order new PPE as required by SDPSB pictorial safety standard</p> <p>Kinta Kellas estate: iii) Will refer the CHRA recommendation before make the order for PPE. iv) To train the worker regarding to wear the PPE as per SDPSB pictorial safety standard.</p>
<p>Assessment Conclusion</p>	<p>ASA1_2 verification: Observed during site review, all workers provided with full complete PPE while doing work. As for the mill, a pre-check by the security to ensure all contractors follow the PPE requirement prior to entry and permit to work will be issued before they can start work.</p> <p>Thus, the corrective action was verified and the minor non-conformity was closed on 15/3/2018.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
<p>NCR Ref #</p>	<p>1453612- 201703- N2</p>	<p>Clause & Category (Major/Minor)</p>	<p>Indicator 4.7.6 Minor</p>
<p>Closed (Yes/No)</p>	<p>Yes</p>	<p>Date of nonconformity closure</p>	<p>13/03/2018</p>
<p>Statement of Nonconformity</p>	<p>Accident insurance was not comprehensively covered for all workers</p>		
<p>Requirement Reference</p>	<p>All workers shall be provided with medical care, and covered by accident insurance.</p>		
<p>Objective Evidence</p>	<p>Elphil POM i) No record of accident insurance available for contractor's workers: passport# AA3658248, BC 0761054 and check-roll worker AS932163</p>		
<p>Corrective Action</p>	<p>Elphil POM: i) To check the record and ensure availability of accident insurance for contractor's workers. Record of accident insurance available for contractor's workers: passport# AA3658248, BC 0761054 and check-roll worker AS932163.</p>		
<p>Assessment Conclusion</p>	<p>ASA1_2 verification: The mill has terminated the service with Kejuruteraan Serting and engaged Maju Mech. The new contractor's workers has all the required documents (passport, permit and insurance). Thus, the corrective action was verified and the minor non-conformity was closed on 15/3/2018.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
<p>NCR Ref #</p>	<p>1453612- 201703- N3</p>	<p>Clause & Category (Major/Minor)</p>	<p>Indicator 5.3.3 Minor</p>

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Closed (Yes/No)	Yes	Date of nonconformity closure	13/03/2018
Statement of Nonconformity	A waste management and disposal plan was not implement effectively		
Requirement Reference	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented		
Objective Evidence	In POM, waste management action plan 2016/2017 updated on 15 Jan 2017 incomplete without incorporating all the waste available in POM, for example: contaminated rags, paint container and etc. In Kinta Kellas, rubbish were found scattered surrounding the line site although rubbish bins have been provided to all the residents. Paint container which are categorized as the schedule waste were observed in the dump site. In Elphil estate; Kamiri Division; block 99F, chemical container were observed in the dump site.		
Corrective Action	<ol style="list-style-type: none"> 1. Waste management action plan will updated and completed, incorporating all the waste available in POM, for example: contaminated rags, paint container and etc as per identification of waste. 2. To give training for all level regarding schedule waste management for better understanding. 		
Assessment Conclusion	ASA1_2 verification: Based on the visits of surrounding area (line-sites, office, stores, etc.), there was no rubbish indiscriminately dumped. The general wastes at the visited estates were mostly disposed through Kuala Kangsar District Council, whereby landfill in the premise is no longer necessary. Thus, the corrective action was verified and the minor non-conformity was closed on 15/3/2018.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1453612- 201703- N4	Clause & Category (Major/Minor)	Indicator 6.9.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	13/03/2018
Statement of Nonconformity	Frequency of the meeting was not in accordance to the Gender Committee Handbook.		
Requirement Reference	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.		
Objective Evidence	Elphil POM and Elphil Estate: SDPSB has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. According to the handbook, the meeting shall be conducted quarterly (every 3 months once). However, the meeting was conducted half yearly on 21/6/2016 and 25/1/2017 for the mill and on 21/6/2016 and 24/1/2017 for the estate.		
Corrective Action	<ol style="list-style-type: none"> 1. Already done the training on 6 and 7 March 2017 for Gender, Human and Reproductive right. 2. Gender committee will be scheduled to once on every 3 months. 		
Assessment Conclusion	ASA1_2 verification: Elphil POM and Elphil Estate has established Gender Committee which led by Chief Clerk from Elphil Estate with 10 committee members. The meeting was conducted once every 3 months as per the Gender Committee Handbook, First Edition. The		

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	<p>meeting was conducted on 27/4/2017, 26/7/2017, 26/10/2017 and 29/1/2018. Issues raised during the meeting were resolved and reported during the next meeting. Interviewed with the female employees and female residents such as housewives confirmed that no case of sexual harassment been reported.</p> <p>Gender Committee was established in Kamuning Estate to act as a channel for the female workers to express their feelings. The meeting was conducted on quarterly basis and seen the meeting minutes dated 15/8/2017, 10/11/2017 and 24/2/2018. No issue was reported during the meetings. Interviewed with the female employees confirmed that no sexual harassment or violence case has been reported to date.</p> <p>Thus, the corrective action was verified and the minor non-conformity was closed on 15/3/2018.</p>
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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1453612- 201703- N5	Clause & Category (Major/Minor)	Indicator 6.10.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	13/03/2018
Statement of Nonconformity	Contract agreement of the FFB Trader was expired.		
Requirement Reference	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.		
Objective Evidence	Elphil POM: The agreement with FFB Traders were found expired as below: a. Contract No.: P/P/0415/FFB00645L expired on 31/3/2016		
Corrective Action	1. To inform GTM to ensure for all contract update need to inform and pass the copy of contract to mill. 2. To ensure to have contract tracking by AAO for validity of the contract. 3. Contract for FFB Traders is available for Tang Tatt Trading and valid as per agreement. Another one FFB Trader Eng Huat Latex still pending from GTM and follow up to get the document immediately.		
Assessment Conclusion	ASA1_2 verification: Contract of agreement for the FFB traders were sampled as below: a. Registration No.: 800322-K for FFB trader which valid until 31/12/2018. b. Registration No.: 387039-W for FFB trader which valid until 31/12/2018. Thus, the corrective action was verified and the minor non-conformity was closed on 13/3/2018.		

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	CATEGORY (MAJOR/MINOR)	ISSUED	STATUS & DATE (Closure)
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1306204M1 – 5.2.2	Major	24/3/2016	Closed out on 7/6/2016
1306204M2 – 6.5.2	Major	24/3/2016	Closed out on 19/5/2016
1306204N1 – 4.3.2	Minor	24/3/2016	Closed out on 23/03/2017
1306204N2 – 4.4.1	Minor	24/3/2016	Closed out on 23/03/2017
1306204N3 – 4.7.5	Minor	24/3/2016	Closed out on 23/03/2017
1306204N4 – 6.6.2	Minor	24/3/2016	Closed out on 23/03/2017
1453612-201703-M1 – 4.7.1	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M2 – 4.7.2	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M3 – 4.7.5	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M4 – 4.4.2	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M5 – 5.1.1	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M6 – 5.3.2	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M7 – 6.3.1	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M8 – 6.5.2	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M9 – 2.1.1	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-N1 – 4.7.3	Minor	23/03/2017	Closed out on 13/03/2018
1453612-201703-N2 – 4.7.6	Minor	23/03/2017	Closed out on 13/03/2018
1453612-201703-N3 – 5.3.3	Minor	23/03/2017	Closed out on 13/03/2018
1453612-201703-N4 – 6.9.3	Minor	23/03/2017	Closed out on 13/03/2018
1453612-201703-N5 – 6.10.3	Minor	23/03/2017	Closed out on 13/03/2018
1606941-201802-M1 – RSPO SCCS E.5.1	Major	15/03/2018	Closed out on 14/5/2018
1606941-201802-N1 – 6.8.3	Minor	15/03/2018	“Open”
1606941-201802-N2 – 5.1.2	Minor	15/03/2018	“Open”
1606941-201802-N3 – 5.6.1	Minor	15/03/2018	“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 Elphil 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	
Internal Stakeholders	Union/Contractors/Local Communities

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<p>NUPW Representative Gender Committee Mill Operators Field workers Workers representatives by nationalities (India, Bangladesh, Indonesia and Nepal) General worker (linesite sweeper)</p>	<p>Smallholder</p>
<p>Government Departments SJK (T) Ldg Elphil Representative Auxiliry police</p>	<p>NGO No complaint raised by NGO at Elphil CU. No NGO was contacted.</p>

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IS #	Description
1	<p>Issues: Contractors – They have signed agreement with the management prior to commence to work and understood the terms and conditions. They are aware of the complaint and whistleblowing procedures. They informed that the payment was made promptly.</p> <p>Management Responses: The management will continue to ensure the payment will be made promptly.</p> <p>Audit Team Findings: No other issue.</p>
2	<p>Issues: Smallholders (Vegetable Farm and Oil Palm Farm) – They informed that no encroachment of land by the management. Boundary stones and trenches were available to demarcate the boundary. They are aware of the complaint procedure.</p> <p>Management Responses: The management will ensure they maintain good relationship with the smallholders.</p> <p>Audit Team Findings: No further issue.</p>
3	<p>Issues: Workers’ Representatives (Different Nationalities) included NUPW representatives – They were treated equally without discrimination. They were allowed to move freely without any restriction. Pay and condition was according to the Minimum Wage Order 2016 and Employment Act 1955. They understood on the complaint procedure and informed that actions have been taken by management if any defect/ damage in the housing. However, they were workers from India and Indonesia informed that they have paid an amount of money to the agent before they came to work for the transportation cost, permit and passport and etc. Details refer to 6.8.3.</p> <p>Management Responses: The management will treat the workers equally does not matter about nationalities or gender. They will ensure they comply with all the regulations and legal requirements.</p> <p>Audit Team Findings: No other issue.</p>
4	<p>Issues: School Headmaster – He expressed his gratitude to the management for all kind of assistance the management has provided to him. For eg: the management has helped to construct the fence around the school and repaired the roof at the car porch. He has good relationship with the management.</p> <p>Management Responses: The management will continue to support and provide assistance whenever necessary.</p> <p>Audit Team Findings: No other issue.</p>

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Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Elphil Palm Oil Mill Certification Unit has complied with the 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 Elphil Palm Oil Mill Certification Unit is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Zainal Abidin	Name: Shylaja Devi Vasudevan Nair
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Sime Darby Plantation Berhad
Title: Lead Auditor	Title: Head Sustainability - G3OM
Signature: 	Signature: (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.) 
Date: 17 th July 2018	Date: 17/7/2018

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Commitment to Transparency			
Criterion 1.1:			
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	<p>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.</p> <p>- Minor compliance -</p>	<p>Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Requests for information from the Regulatory Department such as DOE quarterly reports were attended and no noncompliance or complaints were noted. Publicly available documents such as land title, OSH plan, HGV documents, negotiation procedure, complaint records, RSPO public summary reports, EIA, Management Plans & Continuous Improvement Plans and company policies are Available.</p> <p>Mill and estate assistant at each operating unit responsible on providing & updating the information to relevant stakeholder</p>	Complied
1.1.2	<p>Records of requests for information and responses shall be maintained.</p> <p>-Major compliance</p>	<p>The stakeholders such as school and temple representatives have written in formally to the management to request for donation or assistance and the management has responded on the requests accordingly. Sampled of letter of request and payment voucher as below:</p> <ul style="list-style-type: none"> a. Ref. No.: SJK(T)LE/ABD4118/2017/Bil. Dated 27/3/2017 Purpose: Donation for Annual Sport Day Payment Voucher No.: 16000057903 dated 26/4/2017 b. Letter dated 14/5/2017 from Temple Purpose: Donation for Festival Celebration Payment Voucher No.: 1600000406 dated 6/7/2017 	Complied
Criterion 1.2:			
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
<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Sime Darby Plantations Sdn Bhd continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available through Sime Darby Plantations Sdn Bhd website and http://www.simedarbyplantation.com/Sustainability.aspx</p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> • Good Agricultural Practices • Social Enhancement • Sustainability Management Programmes • Complaint and Grievances procedure. • Environmental Conservation <p>These documents highlight current Sime Darby Plantations Sdn Bhd practices and their continual improvement plans. Besides the above document Sime Darby Plantations Sdn Bhd policy on the followings are also available at the same website:</p> <ol style="list-style-type: none"> 1) Social 2) Quality 3) Food Safety 4) Occupational Safety & Health 5) Environment & Biodiversity 6) Slope Protection and Buffer Zone 7) Lean Six Sigma 8) Gender <p>In addition to the website, the policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p>	<p>Complied</p>
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>		
<p>1.3.1</p> <p>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.</p> <p>-Minor compliance</p>	<p>Sime Darby Plantation Berhad has implemented Code of Business Conduct handbook which covers all operations in the plantation. Attitude of fair, integrity and ethic should be implemented during any business process. The company is strictly prohibited to have any bribery related in the business processes.</p> <p>COBC training was conducted on 30/10/2017 in Elphil POM, 16/10/2017 for workers and 30/10/2017 for contractors in Kamuning Estate and 10/7/2017 in Elphil Estate by Manager and Assistant Managers. Seen the attendance list of the workers, staffs and contractors that attended the training.</p>	<p>Complied</p>
<p>Principle 2: Compliance with applicable laws and regulations</p>		
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>		

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Criterion / Indicator	Assessment Findings	Compliance
<p>2.1.1</p> <p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>SOU3 had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and PSQM sustainability team. SOU3 had obtained and renewed license and permits as required by the law.</p> <p>Sample of license Elphil POM</p> <p>i) DOE License no. 001845, Compliance Schedule ref# S(B) A91/110/616/091, validity period 1/7/18 -30/6/18</p> <p>ii) Akta Bekalan Elektrik 1990- License no: ST(PIP)P/S/PRK/00429 issue on 19/12/17 for 3000 kW.</p> <p>iii) Certified Environmental professional in the treatment of POM- Pond Processes (CEPPOME; No: 16001)</p> <p>iv) Certified Environmental professional in Scheduled Waste Management - (CePSWaM/170429)</p> <p>v) Certificate of Fitness for Unfired Pressure Vessel (UPV) and Steam Boiler (SB)</p> <ul style="list-style-type: none"> - PK PMD 80023 valid until 28/11/18 - PK PMD 745 valid until 27/6/18 - PK PMT 3878 valid until 27/6/18 - PK PMT 3879 valid until 27/6/18 - PK PMT 3880 valid until 27/6/18 <p>vi) MPOB License: 54132004000; expired 31 May 2018</p> <p>vii) Competent Person</p> <p>AESP – Serial# NW-HQ-AE-6476-P valid until 8/11/19</p> <p>AGT – Serial# NW-HQ-AGT-R-0314-P valid until 10/4/19</p> <p><u>Kamuning Estate</u></p> <p>i) MPOB license, 524034002000 valid until 30/9/18</p> <p>ii) Diesel Permit, ref# SK/22/B.PGK.KK, serial number: A031027, approved quantity: 5,000 liter. Valid until 19/2/19.</p> <p>iii) Diesel Permit, ref# SK/20/B.PGK.KK, serial number: A031026, approved quantity: 10,000 liter. Valid until 19/2/19 (main division)</p> <p><u>Elphil Estate</u></p> <p>i) Diesel Permit, ref# SK/10/B.PGK.KK, serial number: A031006, approved quantity: 9,000 liter. Valid until 22/11/18</p> <p>ii) Certificate of fitness for air compressor, PK PMT 6619 valid until 5/9/18.</p> <p>iii) MPOB license: 52984002000 valid until 31/5/18</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance	
	<p>Elphil POM has applied to Labour Department to make deduction on salary for mosque and temple fund on 16/11/2017. Labour Department has replied on 8/1/2018 with Ref. No. PTK.KK/10803/07319 to obtain further documents from mill management. The mill management has sent the additional documents to the department and waiting for approval.</p> <p>Besides, mill management has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia to deduct electricity bill. Approval letter with Ref. No. BHG.PU/9/129 JLD 33(53) dated 6/7/2017.</p> <p>Human Resource Department of Sime Darby Plantation Berhad has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for the extension of overtime to maximum 130 hours per month. Letter of approval with Ref. No. BHG.PU/9/134 JLD 9 (11) dated 27/3/2017 was sighted. Verified the overtime records in the mill found that no employees who worked more than 130 hours of overtime in the sampled month.</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 legal and other requirements was made available during the assessment and compiled in the QSHE/04/5.2.4 folder. Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>At all visited operating units, a summary of compliance FY2017 incorporating all the legal requirements are sighted during onsite. Latest requirements such as Employment Insurance System (EIS) 2017 and FMA (Exemption of Certificate of Fitness for Unfired Pressure Vessel) Order 2017 are registered in the list.</p>	Complied
2.1.3	<p>A mechanism for ensuring compliance shall be implemented.</p> <p>- Minor compliance -</p>	<p>Mechanism for ensuring compliance through internal audit. Based on the latest updated register dated 1/2/18, no non-compliance recorded and checked by the internal audit team.</p>	Complied
2.1.4	<p>A system for tracking any changes in the law shall be implemented.</p> <p>- Minor compliance -</p>	<p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group's Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations.</p>	Complied
<p>Criterion 2.2: 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.</p>			
2.2.1	<p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.</p> <p>- Major compliance -</p>	<p>Elphil CU was able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The CU has a list of all its land titles which have the information about names of leasee, hectare, terms & conditions, lease period and grant numbers. Copies of the land titles were available at the CU's offices while the original were kept at headquarter.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Various methods have been used for demarcation of boundary such as trenching, red/white pegs, roads, etc. At Kamuning Estate, Estate boundary with Forest Reserve Kledang Saiong was visited and roads were used as boundary demarcation.	Complied
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 -	There is no land dispute in SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company.	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	There is no land dispute in SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company.	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	There is no land dispute in SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company.	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	There is no land dispute in SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company.	Complied
Criterion 2.3: 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.		
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 -	Complied

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Criterion / Indicator	Assessment Findings	Compliance
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 is no land dispute in the SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company. Boundary stones and trenches were available to demarcate the boundaries.	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 is no land dispute in the SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company. Boundary stones and trenches were available to demarcate the boundaries.	Complied
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 is no land dispute in the SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company. Boundary stones and trenches were available to demarcate the boundaries.	Complied
Principle 3: Commitment to long-term economic and financial viability		
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.		

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Criterion / Indicator	Assessment Findings	Compliance														
3.1.1 A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER, and KER, OPEX, CAPEX etc. Elphil Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year. CAPEX allocation for mill and estate was made available for review for FY 17/18: Mill : operation – MPD shaftless conveyor, waste management (piping, pump system complete with wiring) The business or management plan for the estate was presented in the form of annual budget with 5 years projection. The annual budget contains the crop projection and the finance allocation for field operation and administrations. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.	Complied														
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 visited estates have prepared the replanting programme with minimum of 5 years projection. Below is the example of programme at Kamuning Estate: <table border="1" data-bbox="660 1084 967 1323"> <thead> <tr> <th>Year</th> <th>Ha to be replanted</th> </tr> </thead> <tbody> <tr> <td>FY17/18</td> <td>97</td> </tr> <tr> <td>FY18/19</td> <td>95</td> </tr> <tr> <td>FY19/20</td> <td>145</td> </tr> <tr> <td>FY20/21</td> <td>140</td> </tr> <tr> <td>FY21/22</td> <td>136</td> </tr> <tr> <td>FY22/23</td> <td>151</td> </tr> </tbody> </table>	Year	Ha to be replanted	FY17/18	97	FY18/19	95	FY19/20	145	FY20/21	140	FY21/22	136	FY22/23	151	Complied
Year	Ha to be replanted															
FY17/18	97															
FY18/19	95															
FY19/20	145															
FY20/21	140															
FY21/22	136															
FY22/23	151															
Principle 4: Use of appropriate best practices by growers and millers																
Criterion 4.1: 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 available for the Palm Oil Mill and the Estates.</p> <p>Palm Oil Mill holds two SOPs: Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. SOP for the Composting Plant dated 15/8/2011: Composting Management System version 1:2011</p> <p>Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc. Noted updated procedure under SOP for water analysis and RSPO SCCS procedure:</p> <p>i) SPMS, Appendix 7: SOP for water quality monitoring, issue:2 dated 1/6/16.</p> <p>SOP for sampling guideline</p> <p>i) Water and Wastewater Sampling Guideline, issue:1 dated 1/6/16.</p> <p>ii) RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version:2, issue: 2 dated February 2018</p>	Complied
4.1.2 A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	<p>External Mill Advisor and a Planting Advisor inspect and report on the operations on annual basis. There were other audits by PSQM and GCAD to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.</p>	Complied
4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	<p>Mill Advisor's latest visit was carried out on 16-17/10/17. (report No.: SOU3/ELM/01/17-18). Report includes monitoring of all activities in the mill covering the OER & KER performance, process losses, mill throughput (maintenance, downtime), product quality and compliance monitoring.</p> <p>There were various mechanisms implemented by the estates to ensure the consistent implementation of the procedures. Among the mechanisms are daily supervision of field staff, internal audit and visit of Planting Advisor. Records of monitoring such as PA visit report and internal audit report were maintained by the management as reference to any necessary action to be taken.</p>	Complied
4.1.4 The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	<p>Elphil mill maintains a daily record of all FFB received from 3rd party source. Verification of its quantity of FFB received from non-certified third party and the relevant transportation documents such as delivery order and weighbridge ticket confirm the authenticity of the records.</p>	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.		
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 -	<p>ARM Section 8 covers the procedure for fertiliser application for both immature and mature. The procedure gives the guideline type of fertilisers to be used, timing to apply, dosage and placement.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
4.2.2 Records of fertiliser inputs shall be maintained. - Minor compliance -	Recorded in store issue notes and manuring record book, which have the information about type of fertiliser, quantity (bags and kg), dates of application and field number.	Complied
4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Evidence of periodic tissue and soil sampling to monitor the changes in nutrient status was available and presented in Soil Analysis Report by the Sime Darby's Agronomy Department. The results of the analysis were used by the agronomist for their recommendation for fertilisers applications programme.	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 -	EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Elphil POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the rate per hectare is 40 mt/Ha.	Complied
Criterion 4.3: Practices minimise and control erosion and degradation of soils.		
4.3.1 Maps of any fragile soils shall be available. - Major compliance -	Soil series map available for both visited estates. There are no peat soil or soil categorised as problematic or fragile at all the visited estates.	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 -	Ref.: ARM Section 4, Land Preparation, Clause 8.4 which reads "Areas with greater than 25 degree slope should not be planted and best left for biodiversity purposes...". The area which has more than 25 degree will be excluded from being replanted in future. For hilly area between 9 - 25 degree, ARM is referred to as a management strategy to minimise soil erosion.	Complied
4.3.3 A road maintenance programme shall be in place. - Minor compliance -	Road maintenance program for FY 2017/18 is available for all the visited estates. Among the activities for the road maintenance are roadside pruning, grading and resurfacing, roadside pit (to divert flow of water). Based on expenditure report, the progress to-date is in-line with the programme.	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 peat soil at the visited estates.	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 peat soil at the visited estates.	Complied
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 or problem soil at the visited estates.	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.															
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	Water management plan: Contingency plan during water shortage for financial year 2017/2018 for Elphil POM date 3/7/17 has include: i) Water shortage/dry spell - Purchase water from Lembaga Air Perak (LAP) - Train staff/workers to conserve water - To proposed tube well application ii) Severe water pollution - Water supply to be purchased from Lembaga Air Perak - To perform treatment of polluted water At POM, existing plan to reduce water usage dated 5/1/18 was verified. i) Rain water collection/harvesting – use for floor cleaning ii) Turbine cooling water – recycled water for mill processing	Complied												
4.4.2	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. - Major compliance -	Documented as a Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). The widths of the buffer zones are guided by the following measurements: <table border="1" data-bbox="662 1025 1297 1211"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 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>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/ivers, version 1, year 2008, issue no. 1, dated 1/11/2008.	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	Complied
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														
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 -	Effluent Analysis conducted by Sime Darby Research and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. Latest analysis report for January 2018 was checked. Refer to test report# EP87/2018 date issue 26/2/18. BOD for final discharge is 48 mg/l (limit 50 mg/l) Quarter return report submitted on quarterly basis to DOE. The final quarter (Q4) 2017 report available for review. Refer to report dated 12/1/18.	Complied												
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from water catchment by using pump. An average of 0.76 m ³ water is used to process per mt of FFB recorded from July 2017 to February 2018.	Complied												
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.															

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Criterion / Indicator		Assessment Findings	Compliance										
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	Implementation of IPM is guided by the ARM, Section 15, Plant Protection. Major pest at the visited estates is mainly rats. IPM implemented to suppress the rat population is by rearing barn owl (<i>tyto alba</i>). The barn owls population status is monitored through census done annually. Rat baiting is done by using first generation bait, warfarin. There has been no outbreak of leaf eating pest at the visited estates. Nonetheless, it was noted that beneficial plant such as <i>antigonon leptopus</i> and <i>turnera subulata</i> were planted along some of the field roads to host the predators. Trunk injections were occasionally done as prevention measure using less toxic chemical i.e. Impact 75 [a.i.: Acephate 75% (CAS# 30560-19-1), SDS # IT-003 by Hextar dated 9/10/2015].	Complied										
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Training of those involved in IPM implementation was adequately demonstrated through training plan and records. Interview with the staff showed that their understanding on IPM were good.	Complied										
Criterion 4.6:													
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 all pesticides used documented in Sime Darby Plantation's Agriculture Reference Manual, SDP/OP/ARM/10348, version:3, issue:1 dated 1/7/2011. Weed Management under section 16 has described the use of selective products that are specific to the target pest, weed or disease. For the immature area weeds such as (legume and broadleaves) herbicide with active ingredient (metsulfuron methyl) was used. For bagworm treatment, SOP ref# CS-SOP-M-21, dated 3/3/15 has been established. Alternative chemical for class IB was introduced, with the used of Acephate 75% soluble powder insecticide for leaf eating caterpillar control in oil palm plantation.	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 used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established and monitored. The records of weeding programme and herbicide master list was sighted. <table border="1" data-bbox="657 1574 1302 1861"> <tr> <td></td> <td>FY17/18 (updated Feb 18)</td> </tr> <tr> <td>Kamuning Estate</td> <td>Ai/ha</td> </tr> <tr> <td>February 2018</td> <td>0.114</td> </tr> <tr> <td>January 2018</td> <td>0.124</td> </tr> <tr> <td>December 2017</td> <td>0.163</td> </tr> </table>		FY17/18 (updated Feb 18)	Kamuning Estate	Ai/ha	February 2018	0.114	January 2018	0.124	December 2017	0.163	Complied
	FY17/18 (updated Feb 18)												
Kamuning Estate	Ai/ha												
February 2018	0.114												
January 2018	0.124												
December 2017	0.163												

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Criterion / Indicator	Assessment Findings	Compliance									
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 Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the said reference manual. Complied									
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 -	Based on chemical register and on site visit at chemical store, there were no class 1A, 1B and paraquat used at all visited estates. 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 -	<p>Pesticides were handled, used or applied by trained workers applied in accordance with the product label. Latest training for pesticides handler was conducted on 13/7/17. Appropriate safety and application equipment were provided and used, i.e 3M 3200/3200F, anti-fog goggles, apron and wellington boots. Sample of chemical safety data sheet (SDS) checked and available during site visit:</p> <table border="1" data-bbox="659 1216 1299 1442"> <thead> <tr> <th>Chemical/trade name</th> <th>Active ingredient</th> <th>Chemical Class</th> </tr> </thead> <tbody> <tr> <td>Ancom Thiram 80</td> <td>Tetramethylthiuram disulphide</td> <td>III</td> </tr> <tr> <td>Hextar 2,4-D Amine 60</td> <td>2,4-D dimethylamine</td> <td>II</td> </tr> </tbody> </table> <p>All precautions attached to the products (SDS, notice board etc) were properly observed, applied, and understood by workers based on the interview with staff and workers at visited estates.</p> Complied	Chemical/trade name	Active ingredient	Chemical Class	Ancom Thiram 80	Tetramethylthiuram disulphide	III	Hextar 2,4-D Amine 60	2,4-D dimethylamine	II
Chemical/trade name	Active ingredient	Chemical Class									
Ancom Thiram 80	Tetramethylthiuram disulphide	III									
Hextar 2,4-D Amine 60	2,4-D dimethylamine	II									
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 -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. Complied									
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5. For weeding activities, knapsack spray pump and low volume CDA spray are used for selective and circle spraying. For bagworm, bagworm infestation is treated using trunk injection. Complied									

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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 aerial spray at SOU3.	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 at SOU3. Employees demonstrate knowledge and skills on pesticide handling. MSDS/SDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers.	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 -	Pesticide empty containers, waste oil, used filters, etc. was seen to be kept in locked designated waste store. Disposal of waste material are in accordance with procedure and legal requirement.	Complied																
4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<p>Medical surveillance was last done on 1/7/17 and 31/1/18 for workers from chemical sprayer, mixer and workshop operator by OHD DOSH Reg. No. JKPP HQ/11/DOC/00/200 under Klinik Tweedie. Sampled workers for spraying gang at field 12C:</p> <table border="1" data-bbox="662 1160 1305 1529"> <thead> <tr> <th>Employee/passport number</th> <th>Health Status</th> </tr> </thead> <tbody> <tr> <td>09406831</td> <td>Fit</td> </tr> <tr> <td>09407883</td> <td>Fit</td> </tr> <tr> <td>M4746874</td> <td>Fit</td> </tr> <tr> <td>06831444</td> <td>Fit</td> </tr> <tr> <td>M7087975</td> <td>Fit</td> </tr> <tr> <td>P5924632</td> <td>Fit</td> </tr> <tr> <td>07493754</td> <td>Fit</td> </tr> </tbody> </table> <p>All workers send for medical surveillance are fit to work with no detrimental of health.</p> <p><u>Elphil Estate</u></p> <p>Last medical surveillance was done on 2/6/17 by OHD OHD DOSH Reg. No. JKPP HQ/11/DOC/00/200 under Klinik Tweedie. A few group of chemical handler (mixer and sprayer) and workshop operator were sent for annual surveillance monitoring. All workers send for medical surveillance are fit to work with no detrimental of health.</p>	Employee/passport number	Health Status	09406831	Fit	09407883	Fit	M4746874	Fit	06831444	Fit	M7087975	Fit	P5924632	Fit	07493754	Fit	Complied
Employee/passport number	Health Status																	
09406831	Fit																	
09407883	Fit																	
M4746874	Fit																	
06831444	Fit																	
M7087975	Fit																	
P5924632	Fit																	
07493754	Fit																	
4.6.12 No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	Noted there were a few women working as chemical mixers and sprayers. Verified that the worker were over the reproductive age.	Complied																

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Criterion / Indicator	Assessment Findings	Compliance								
<p>Criterion 4.7: 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>SOU3 has maintained an approved Health and Safety Policy dated January 2015 that is displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site safety officers and monitored by OSH Manager from Head Office. Sample of Elphil Palm Oil Mill ESH programme for FY2017/2018:</p> <p>Annual Audiometric Testing</p> <p>Annual and baseline audiometric – 2/8/17 by Procoma Environmental (M) Sdn Bhd, report ref# PRO/AUG/17(KKSE/63) carried out for 63 workers. 9 workers affected with 9 HI and 2 reported with STS. Retest was done 30/10/17 for 2 affected workers, and found no permanent STS recorded.</p> <p>LEV Inspection and Testing</p> <p>LEV inspection was carried out by registered hygiene technician – JKKP HIE 127/171/3-2(23)-2017/026. Face and travel velocity comply with ACGIH.</p> <p>Medical Surveillance Programme</p> <p>Annual medical surveillance was last carried out on 20/9/17 for manganese and hexane exposure for 11 workers from workshop and laboratory under Klinik Tweedie, OHD reg. no. HQ/11/DOC/00/200. Additional medical surveillance was carried out for contractor’s worker, BL 0333464. Date of monitoring on 8/3/18 (date joined) under Klinik Tweedie.</p> <p>Chemical Hazard Risk Assessment (CHRA)</p> <p>CHRA was last revisited on August 2015 by registered DOSH assessor, JKKP HIE 127/171-2 (124). 8 work units were assessed and related recommendation report under from F of the report. Example of recommendation as per below:</p> <table border="1" data-bbox="660 1563 1305 1839"> <thead> <tr> <th>Work unit</th> <th>Recommendation</th> </tr> </thead> <tbody> <tr> <td>Storekeeper</td> <td>Chemical safe handling every 2 years Medical surveillance programme</td> </tr> <tr> <td>Laboratory</td> <td>Chemical safe handling every 2 years Biological monitoring/medical surveillance programme</td> </tr> <tr> <td>Workshop</td> <td>Chemical safe handling every 2 years Biological monitoring/medical surveillance programme</td> </tr> </tbody> </table>	Work unit	Recommendation	Storekeeper	Chemical safe handling every 2 years Medical surveillance programme	Laboratory	Chemical safe handling every 2 years Biological monitoring/medical surveillance programme	Workshop	Chemical safe handling every 2 years Biological monitoring/medical surveillance programme	<p>Complied</p>
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<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. - Major compliance -</p>	<p>SOU 3 had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. For example, CHRA for Kamuning Estate was last revisited on 9/3/17 by registered assessor, JKPP HIE 127/171-2(124). For HIRARC, summary of review dated 18/6/17 reported as per the following table:</p> <table border="1" data-bbox="662 638 1300 1137"> <thead> <tr> <th>Work Unit</th> <th>Activity</th> <th>Risk</th> <th>Risk Control</th> </tr> </thead> <tbody> <tr> <td>Harvesting</td> <td>cutting long stalk bunch</td> <td>Hand injury</td> <td>SOP review, PPE compliance, working tool modification</td> </tr> <tr> <td>Tractor driver</td> <td>Loading FFB with infield grabber</td> <td>Body injury</td> <td>SOP review, PPE compliance, refreshment</td> </tr> <tr> <td>Harvesting</td> <td>Cutting FFB and frond</td> <td>Fatality, hand and body injury</td> <td>SOP review, PPE compliance, refreshment</td> </tr> </tbody> </table> <p><u>Elphil Estate</u></p> <p>CHRA was last carried out on 15/10/2015 by DOSH registered assessor, JKPP HIE 127/171-2(124). New addendum report dated 29/9/17 made available for review. The report is to incorporate the use of new chemical in the estate.</p>	Work Unit	Activity	Risk	Risk Control	Harvesting	cutting long stalk bunch	Hand injury	SOP review, PPE compliance, working tool modification	Tractor driver	Loading FFB with infield grabber	Body injury	SOP review, PPE compliance, refreshment	Harvesting	Cutting FFB and frond	Fatality, hand and body injury	SOP review, PPE compliance, refreshment	<p>Complied</p>
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<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. - Minor compliance -</p>	<p>Awareness and training programme 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. Suitable PPE has been provided to the workers based on the information in the MSDS/CSDS and CHRA assessor's recommendation.</p> <p>List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p> <ul style="list-style-type: none"> i) Sterilizer and boiler/power operator – Safety Helmet, Semi leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff ii) Lab operator – Respirator (double cartridge) Nitrile Glove (chemical resistant), safety boots, Ear plug (NRR = 24 dB) iii) Field workers (sprayer, manurer & harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover. 	<p>Complied</p>																

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.4</p> <p>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>Assistant manager and QA at each of the operating units are appointed as OSH Coordinators and Estate Hospital Assistant as Safety and Health Committee Secretary. OSH Committees meeting conducted quarterly and meeting minutes includes issues raised and action taken from workplace inspection report etc. The latest meeting was conducted on the 29/12/17 at Elphil Palm Oil Mill. All members has attended the meeting with discussion on the accident review, safety improvement plan, issues from workers has been discussed and action to be taken. There was no major issue.</p> <p>For estate, person in charge for appointed for OSH coordinator are Estate Hospital Assistant and Estate assistant. At Kamuning Estate, the latest SHC meeting – 2017 (4th meeting: 15/12/17, 3rd meeting: 20/9/17). Workplace inspection carried before ESH quarterly meeting. All issues identified highlighted in the meeting for improvement.</p>	<p>Complied</p>
<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. - Minor compliance -</p>	<p>Emergency Response Plan (ERP) has been established and defined in procedure, Level 2, Standard Operation Manual, Sub Section 5.5, Management Responsibility, Appendix 5.5.3.3 Emergency Preparedness and Response Procedure, version:1, issue :1 dated 1/11/2008. Emergency response activities were also included in the ESH plan FY 17/18. The following Emergency Response Plan were addressed: Fire Outbreak, Accident and incident occurrence, Oil Spillage and etc. Latest fire evacuation drill was done on 14/12/17 at Elphil Palm Oil Mill.</p> <p>Accident and emergency procedures have been communicated to employees, contractors and visitors. Workers trained in First Aid were present in the mill and field operations. Records on all incidents kept and summary sent to Head Office. Quarterly review on accident cases carried out during OSH quarterly meeting. Latest incident report under GSQM ESH Portal : Inc-0018735 (class IV) 1-4 days MC. All operating units keeping all the JKPP 6,7 & 8 forms.</p>	<p>Complied</p>

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<p>4.7.6</p> <p>All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p>	<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. Sample of insurance policies and social security (SOCSO) checked:</p> <p>Elphil POM</p> <table border="1" data-bbox="660 600 1299 1048"> <thead> <tr> <th>Employee</th> <th>Policy</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>i) AT448649</td> <td>MW183074 under RHB</td> <td>20/10/17-19/10/18</td> </tr> <tr> <td>ii) AT448621</td> <td>Insurance Berhad</td> <td></td> </tr> <tr> <td>i) AU009268</td> <td>MW177613 under RHB</td> <td>26/9/17-25/9/18</td> </tr> <tr> <td>ii) AU009269</td> <td>Insurance Berhad</td> <td></td> </tr> <tr> <td>i) B4119526</td> <td>MW 167737 under RHB</td> <td>30/8/17-29/8/18</td> </tr> <tr> <td>ii) B4117101</td> <td>Insurance Berhad</td> <td></td> </tr> </tbody> </table> <p>Checked social security payment, "Jadual Caruman" @ 8A form for February 2018 involving 48 workers. Refer to employer ID code, D4508994A</p> <p>Kamuning Estate</p> <table border="1" data-bbox="660 1200 1299 1697"> <thead> <tr> <th>Employee</th> <th>Policy</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>i)AT307941</td> <td>MW135980 under RHB</td> <td>29/3/17 - 28/3/18</td> </tr> <tr> <td>ii)A9093723</td> <td>Insurance Berhad</td> <td></td> </tr> <tr> <td>i) AT371212</td> <td>MW143206under RHB Insurance Berhad</td> <td>25/4/17 - 24/4/18</td> </tr> <tr> <td>ii) AT371588</td> <td></td> <td></td> </tr> <tr> <td>iii) AT499315</td> <td></td> <td></td> </tr> <tr> <td>i) B4119526</td> <td>MW 167737 under RHB</td> <td>30/8/17-29/8/18</td> </tr> <tr> <td>ii) B4117101</td> <td>Insurance Berhad</td> <td></td> </tr> </tbody> </table> <p>Checked social security payment, "Jadual Caruman" @ 8A form for February 2018 involving 114 workers. Refer to employer ID code, D4500544M</p>	Employee	Policy	Validity	i) AT448649	MW183074 under RHB	20/10/17-19/10/18	ii) AT448621	Insurance Berhad		i) AU009268	MW177613 under RHB	26/9/17-25/9/18	ii) AU009269	Insurance Berhad		i) B4119526	MW 167737 under RHB	30/8/17-29/8/18	ii) B4117101	Insurance Berhad		Employee	Policy	Validity	i)AT307941	MW135980 under RHB	29/3/17 - 28/3/18	ii)A9093723	Insurance Berhad		i) AT371212	MW143206under RHB Insurance Berhad	25/4/17 - 24/4/18	ii) AT371588			iii) AT499315			i) B4119526	MW 167737 under RHB	30/8/17-29/8/18	ii) B4117101	Insurance Berhad		<p>Complied</p>
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4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>Records on Lost Time Accident (LTA) metrics displayed at the operating units through Safety Statistic Billboard and reported to PSQM-ESH department using new online system called SMS-IT. Sample of accident statistic as shown below:</p> <table border="1"> <thead> <tr> <th></th> <th>Elphil POM</th> <th>Kamuning</th> <th>Elphil Estate</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>5 cases (8 LTI)</td> <td>3 cases (56 LTI)</td> <td>6 cases (158 LTI)</td> </tr> <tr> <td>2018</td> <td>1 case (3 LTI)</td> <td>0 case</td> <td>2 cases (13 LTI)</td> </tr> </tbody> </table>				Elphil POM	Kamuning	Elphil Estate	2017	5 cases (8 LTI)	3 cases (56 LTI)	6 cases (158 LTI)	2018	1 case (3 LTI)	0 case	2 cases (13 LTI)	Complied				
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<p>Criterion 4.8: 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>SOU3 has established an annual training program FY 2017/2018 that covers all aspects including OSH, environmental, machinery, emergency, 5s housekeeping as well as RSPO Principles and Criteria components.</p>			Complied																

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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&C requirement. Samples of training record as follows:</p> <p><u>Elphil POM</u></p> <table border="1" data-bbox="657 564 1305 752"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>6-10/11/17</td> <td>CePSWaM Training</td> </tr> <tr> <td>14-15/9/17</td> <td>First Aid Training</td> </tr> <tr> <td>30/10/17</td> <td>Safety Town hall</td> </tr> </tbody> </table> <p><u>Kamuning Estate</u></p> <table border="1" data-bbox="657 842 1297 1193"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>9/3/18</td> <td>Lesson learned from accident</td> </tr> <tr> <td>9/3/18</td> <td>Spraying training</td> </tr> <tr> <td>21/2/18</td> <td>SOP and PPE training</td> </tr> <tr> <td>13/2/18</td> <td>Manuring training</td> </tr> <tr> <td>16/10/17</td> <td>First Aid Training</td> </tr> </tbody> </table> <p><u>Elphil Estate</u></p> <table border="1" data-bbox="657 1283 1297 1449"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>9/3/18</td> <td>Chemical spray training by MyCrop</td> </tr> <tr> <td>16/6/17</td> <td>Tractor driver SOP training</td> </tr> </tbody> </table>	Date	Training	6-10/11/17	CePSWaM Training	14-15/9/17	First Aid Training	30/10/17	Safety Town hall	Date	Training	9/3/18	Lesson learned from accident	9/3/18	Spraying training	21/2/18	SOP and PPE training	13/2/18	Manuring training	16/10/17	First Aid Training	Date	Training	9/3/18	Chemical spray training by MyCrop	16/6/17	Tractor driver SOP training	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.

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Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.1</p> <p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p>Plans and impact assessments relating to environmental impacts based on documents as following:</p> <ul style="list-style-type: none"> i) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register. ii) Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI. iii) Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE. <p>POM and Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts. Sample of environmental aspect reviewed:</p> <ul style="list-style-type: none"> i) BOD polishing plant (EIE/2017/BPP/001) dated 27/3/17 ii) Construction of Buffer Pond (EIE/2017/BTDT/011)dated 27/3/17 iii) Composting (EIE/ECP/08-03) dated 27/10/17 	<p>Complied</p>
<p>5.1.2</p> <p>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 -</p>	<p>The mill and estates has continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and assistant managers of mill and estates were identified as person-in-charge of the programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were done annually if there's no any new activity within respective sites. However, some significant environmental aspect was not captured in the management plan @ pollution preventive plan for:</p> <ul style="list-style-type: none"> i) Noise pollution – noise boundary monitoring plan ii) POME solid waste disposal – geo-tube and conventional method of disposal iii) Air emission – Compliance toward Clean Air Regulation 2014. iv) Fire incident – fire incident caused by stakeholder <p>Thus, a minor NC was raised.</p>	<p>Minor nonconformance</p>

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5.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>An Environmental Pollution Prevention Plan 2017/2018 made available for POM and estate. Listed environmental issue/Improvement plan/Location /PIC time bound. This environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year (July 2017 - July 2018) to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. The new directive towards DOE's Guided Self-Regulation is being implemented in accordance to the 7 mainstreaming tools.</p>	<p>Complied</p>
<p>Criterion 5.2: 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 operations managed to best ensure that they are maintained and/or enhanced.</p>			
5.2.1	<p>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).</p> <p>- Major compliance -</p>	<p>HCV Reassessment for SOU 3- Elphil conducted by PSQM Department Sime Darby Sdn Bhd in February 2017. The dedicated team has carried out the HCV assessment for Perak Zone operations including SOU 3 on 04-06th May 2016. In Kamuning Estate, total 4 areas of HCV 4 were identified i.e. Slope/rocky area (ex-GDSB)-54.33 Ha, river reserve (Sg. Nyamuk)-3.66 Ha, water catchment area-9.25 Ha and isolated remnant forest-17.35 Ha. In Elphil Estate, 2 areas of HCV 4 i.e. river reserve (Sg Kerdah)-17.27 Ha, mill water catchment area-3.529 Ha and 1 area of HCV 3 i.e. limestone hill and cave were identified.</p>	<p>Complied</p>
5.2.2	<p>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.</p> <p>- Major compliance -</p>	<p>Based on the HCV assessment done internally, there is no RTE was identified within the planted or surrounding area.</p> <p>Regular patrols within the operating unit estates were carried out and findings recorded by the respective Estate executives to monitor the Conservation / buffer zone areas. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented.</p> <p>Signage that prohibit hunting, fishing and water polluting activities and monitoring record were verified on-site at the estates visited found to have been satisfactorily maintained.</p>	<p>Complied</p>
5.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>To promote awareness on HCV through muster briefing to include HCV related (policy & legal compliance of capture, harm, collect or kill RTE species). For Kamuning Estate, the latest HCV training conducted on 20 March 2017. An HCV and Social Training for SOU 3 Elphil was last conducted on 6- 7 Mar 2017. Training for this year is expected to be conducted in a couple of months.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • 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 -	HCV Monitoring Records for Kamuning and Elphil were available during. For Elphil, it cover the limestone cave and stream Sg Kerдах, the latest monitoring report dated 3 May 2017. Similar report sighted for the Kamuning which cover the all the HCV within the estate.	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 -	No HCV set asides with existing rights of local communities have been identified.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		
5.3.1 All waste products and sources of pollution shall be identified and documented. - Major compliance -	As per Sustainable Plantation Management System Appendix 9 Procedure for Handling of Domestic Waste version 1, year 2008, issue no. 1, dated 1 October 2008. Palm oil mill - Type of waste generated: a. Scheduled waste, domestic waste and recyclable waste. These categories include: effluent, fibre/shell, EFB, boiler clinker, wash water, scrap metal, scheduled waste, boiler blowdown, hydro-cyclone wash water, methane gas. Estate - Type of waste a. Scheduled waste – SW102, SW109, SW305, SW306, SW322, SW409, SW410, SW404 – workshop, clinic, SW store, store; b. Domestic waste – rubbish & sewage – line-site, office, workshop, store, shop & c. Recycle waste – empty container, waste oil d. Industrial waste – Scrap iron Notification to DOE via E-SWiS, reference number 0803A2346400122018 for February 2018 has included the above scheduled waste generated at Elphil POM. Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained accordingly	Complied

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Criterion / Indicator		Assessment Findings	Compliance						
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	<p>The disposal of used chemicals and containers were done in accordance with their schedule on waste management as planned. 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 a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Latest disposal was done on 9/2/18 by Kualiti Alam, consignment note: 20180209LT6IS9 for SW102 and consignment note: 2018020911C5TIRL for SW 305.</p> <p>For estates, the empty chemical containers are categorised as non-scheduled wastes after the process of triple rinsing is undergone. The practice was based on the triple rinse procedure. The containers were mainly disposed through recycling companies (e.g. SS Setia Teknologi Enterprise). Whereas for used oil (SW305), was taken by Sime Darby Industries (SDI) whom was the company hired to carry out machinery & vehicles maintenance job, back to their premise.</p>	Complied						
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	In POM, waste management action plan 2017/2018 updated on 15 Jan 2018 has incorporated all the waste available in POM, for example: contaminated rags, paint container and etc with reference to the notification made on February 2018, notification number: 0803A2346400122018.	Complied						
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.									
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 -	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of grid supply (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler.</p> <p>The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and coiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis respectively. Summary of kWh/CPO for FY2017/2018 as per below table:</p> <table border="1" data-bbox="657 1738 1295 1839"> <thead> <tr> <th>Month</th> <th>Ratio (kWh/CPO)</th> </tr> </thead> <tbody> <tr> <td>July 2016 – June 2017</td> <td>0.70</td> </tr> <tr> <td>2018 todate</td> <td>0.73</td> </tr> </tbody> </table>	Month	Ratio (kWh/CPO)	July 2016 – June 2017	0.70	2018 todate	0.73	Complied
Month	Ratio (kWh/CPO)								
July 2016 – June 2017	0.70								
2018 todate	0.73								
Criterion 5.5: 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.									

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Criterion / Indicator	Assessment Findings	Compliance							
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 -	The Group policy of "Zero open burning" is enforced since July 2008. The operating units adhere to the policy of "Zero open burning" for any replanting, if any, in the estates. Field inspections made in Kamuning and Elphil estates field showed no evidence of open burning.	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 -	Fire was not used for preparing land for replanting at both visited estates.	Complied						
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.									
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Assessment of all polluting activities was conducted under Environmental Aspect Impact for identifying activities that contributes significant impact to environment As prescribed under "Jadual Pematuhan, license# 002366, air emission from boiler stack have to be monitored twice per year. Stack sampling (PAC-AE-170406) result for 2017 : <table border="1" data-bbox="660 1173 1299 1442"> <thead> <tr> <th>Date of monitoring</th> <th>Stack no.1 (PK PMD 745)</th> </tr> </thead> <tbody> <tr> <td>29/12/17 report reference L-PG-AC1712CSD-0510</td> <td>Solid particle (dust) – 0.2-0.3403 g/Nm3, dry@ 12%CO2.</td> </tr> <tr> <td>5/7/17 report reference L-PG-AC1707CEP-0132</td> <td>Solid particle (dust) – 0.2-0.1678 g/Nm3, dry@ 12%CO2.</td> </tr> </tbody> </table> The emissions of all parameters tested were complied with their respective limits as stipulated in the EQ (Clean Air) Regulations 1978. Smoke emission was monitored using online system (CEMS-DIS) to DOE based on the transmitted data from boiler smoke density indicator and recorder. Emission result was found in compliance with the regulatory limit. For effluent discharge, regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE. Refer to Indicator 4.4.3 for details.	Date of monitoring	Stack no.1 (PK PMD 745)	29/12/17 report reference L-PG-AC1712CSD-0510	Solid particle (dust) – 0.2-0.3403 g/Nm3, dry@ 12%CO2.	5/7/17 report reference L-PG-AC1707CEP-0132	Solid particle (dust) – 0.2-0.1678 g/Nm3, dry@ 12%CO2.	Complied
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Criterion / Indicator	Assessment Findings	Compliance
<p>5.6.2</p> <p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.</p> <p>- Major compliance</p>	<p>For the estate, GHG emissions identified including CO_x, SO_x and NO_x from various sources including fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area.</p> <p>For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization. 5 years plan for GHG reduction (phase I, 20 mills (Malaysia) was sighted. Programme such as feed in tariff (FIT), flaring, CNG, CaP, Co-gen was included in the plan.</p> <p>The Carbon Emission Reduction Strategy is the overall implementation plan that cuts across SDP's value chain-upstream, downstream and other related business. The group target is to reduce emission by 40% at 2021.</p>	<p>Complied</p>
<p>5.6.3</p> <p>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.</p> <p>- Minor compliance -</p>	<p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>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. The report prepared on for 2016. However, there was no latest GHG calculation for 2017 prepared for verification during on site audit. Thus, a minor NC was issued.</p>	<p>Minor Non-Compliance</p>

Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.

Criterion 6.1:

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.

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<p>6.1.1</p> <p>A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -</p>	<p>Social Impact Assessment was conducted on 24-27/8/2015 for SOU 3 Elphil complex (Elphil POM, Elphil Estate, Kamuning Estate and Kinta Kellas Estate) by Social & Environment Projects Unit, PSQM Department. The assessment methodology was through interviews, site observation and documentation review. Findings and recommendation from the assessment team were recorded in the assessment report.</p> <p>Besides, Kamuning Estate management has organized a kick-off meeting with the stakeholders such as contractors and internal employees to discuss on the replanting from Oil Palm to Rubber on 5/1/2018.</p> <p>PSQM Department has conducted an Internal Social & Environmental Impact Assessment for the Estate Reservoir Project in Elphil Estate on 5-6/10/2017. The assessment has involved interview and documentation review. Social aspects such as economic livelihood, safety and health and etc have been assessed.</p>	<p>Complied</p>
<p>6.1.2</p> <p>There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -</p>	<p>Reviewed of the assessment report found that affected stakeholders such as contractors, local communities, government authorities and internal workers were involved in the assessment process. Issues reported by the stakeholders were recorded in the assessment report.</p>	<p>Complied</p>
<p>6.1.3</p> <p>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 -</p>	<p>Elphil Palm Oil Mill has developed Management Plan on Social Impact Assessment on 3/10/2017 by Quality Assurance Supervisor. The area of concerns raised during OSH meeting and workers' meeting were incorporated into the management plan. For eg: Officer from the fire station has requested the management to send their employees for fire drill training. The management has organized the training with total 19 participants on 29/3-1/4/2017. Seen the training attendance list of workers and staffs that participated in the training.</p> <p>Social Impact Assessment Action plan for 2017/2018 was developed in Kamuning Estate on 6/12/2017. Issues from the SIA and stakeholder meeting were incorporated into the plan.</p> <p>Elphil Estate management has developed Management Plan on Social impact Assessment FY 2017/2018 and management review meeting on the social impact assessment report was conducted on 12/8/2017 where issues raised during stakeholder meetings and during the assessment were monitored through the management plan. The plan has incorporated person in charge with specific timeframe to complete the issue.</p>	<p>Complied</p>

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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 management plan was reviewed once a year and the last review was conducted on 3/10/2017 for Elphil POM, 6/12/2017 for Kamuning Estate and 12/3/2018 for Elphil 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 -	No scheme smallholders involved in SOU 3 Elphil operating unit. Not applicable
Criterion 6.2: 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 -	Sime Darby Plantation Berhad has developed Procedure for External Communication (Appendix 5.5.3.2, version 1 and issue date: 1/11/2008). The purpose of the procedure is to put in place a system to effectively communicate with external and internal interested parties on matters in the mill and estates. Time frame to provide feedback should be within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication that required investigation. Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Quality Assurance Supervisor has been appointed by the Mill Manager to be the person in charge for social issues raised in the mill and seen the appointment letter dated 10/3/2017. Manager of Kamuning Estate has been appointed as Social Officer to handle social issue reported in Kamuning Estate. Appointment letter dated 1/1/2018 was sighted. Assistant Manager of Elphil Estate was appointed to be person in charge for social issue reported on Elphil Estate and appointment letter dated 1/7/2017 was available. Complied

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<p>6.2.3</p> <p>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.</p> <p>- Minor compliance -</p>	<p>Stakeholder list for the Mill, Elphil Estate and Kamuning Estate was developed and stakeholders such as contractors and suppliers, local communities, government authorities and etc was included into the list.</p> <p>Stakeholder meeting was conducted on 27/2/2018 for Elphil Mill, Elphil Estate and Kamuning Estate. The stakeholder meeting has involved the participation of stakeholders such as schools’ representatives, local communities, contractors, local communities and etc. Seen the meeting minutes and there were compliments from the stakeholders regarding the assistance provided by the estates and mill. There were some requests from the stakeholders as well and the management has replied during the meeting with the action plan.</p> <p>Besides, Elphil Palm Oil Mill has organized a stakeholder meeting with school’s representative, sundry shop’s owners and contractor on 12/3/2018 to inform the External Audit and discussed if any other issues to be reported.</p> <p>Kamuning Estate also conducted a meeting with smallholders on 5/10/2017 to discuss if any issues happened. Seen the meeting minutes found that no issue was reported by the smallholders.</p>	<p>Complied</p>
<p>Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p>		
<p>6.3.1</p> <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>Sime Darby Plantation Berhad has developed Flowchart and Procedure on Handling Social Issue (Appendix 5, Version 1 and Issue Date: 1/11/2008). The flowchart has detailing the process of handling if any social issue reported. Negotiation process will be initiated within two weeks after outbreak of the issue and will be reported to Head Office if issue could not be resolved.</p> <p>The company has conducted briefing on the complaint procedure and whistle blowing to the workers on 16/10/2017 and 30/10/2017 in Kamuning Estate. Interviewed with the workers and external stakeholders found that they are aware of the complaint procedure and understand the process to lodge complaint.</p>	<p>Complied</p>

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6.3.2 Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	Elphil Palm Oil Mill, Kamuning Estate has implemented Internal & External Complaint Book and Repair & Jobs Requisition Bungalows & Linesite logbook to record any complaints from internal and external stakeholders. There was no complaints received from internal and external stakeholders for Y2017. Grievances lodged related to housing repair were sighted and sampled as below: a. Owner: House No. 13 dated 12/1/2018 Defect Report: Lighting in toilet, backyard, in front of house were not functioning. The management has instructed the Chargeman to repair on 12/1/2018. The Chargeman has repaired on the same day and it has been verified by the occupant by acknowledged on the form. b. Owner: House No. L2 dated 20/11/2017 Defect: Lamp in front of the house was malfunction. Seen the Delivery Order that contractor has repaired the defect and the occupant has acknowledged on the action taken.	Complied
Criterion 6.4: 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 -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 and issue date: 1/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
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 above indicator 6.4.1.	Complied

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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 smallholders reported during the time of audit through interviewed with the local communities and smallholders. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Criterion 6.5: 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 -	The mill and estates consist of local workers, foreign workers and contractor's workers. The management has included basic pay, net pay, gross pay, deduction of salary, phone allowance, holiday pay and etc on the pay slip. Sampled of payslip for March 2017 (low crop), July 2017 (high crop) and January 2018 for mill, April 2017, August 2017 (high crop) and February 2018 (low crop) for Kamuning Estate and March 2017 (high crop), August 2017 and February 2018 (low crop) for Elphil Estate as below: <ul style="list-style-type: none"> a. Employee No.: 72005 (EPOM) b. Employee No.: 95806 (EPOM) c. Employee No.: 118081 (EPOM) d. Employee No.: 123747 (EPOM) e. Employee No.: 133148 (EPOM) f. Employee No.: 68623 (KE) g. Employee No.: 104171 (KE) h. Employee No.: 123046 (KE) i. Employee No.: 112644 (KE) j. Employee No.: 131790 (KE) k. Employee No.: 115533 (EE) l. Employee No.: 85012 (EE) m. Employee No.: 24706 (EE) All the workers have achieved Minimum Wage Order 2016 and were paid double if worked on rest day.	Complied

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<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.</p> <p>- Major compliance -</p>	<p>Employment contract/ offer letter are available and explained in language that understood by workers. The contract was signed by the workers and sampled of contracts as below:</p> <ul style="list-style-type: none"> a. Employee No.: 72005 (EPOM) b. Employee No.: 123747 (EPOM) c. Employee No.: 132890 (EPOM) d. Employee No.: 133148 (EPOM) e. Employee No.: 1355975 (KE) f. Employee No.: 137284 (KE) g. Employee No.: 138557 (KE) h. Employee No.: 115533 (EE) i. Employee No.: 136375 (EE) <p>Besides, for workers who workers more than 2 years (Indonesian) and 3 years (other nationalities) have signed an extension contract as below:</p> <ul style="list-style-type: none"> a. Employee No.: 95806 (EPOM) b. Employee No.: 91959 (KE) c. Employee No.: 104171 (KE) d. Employee No.: 123046 (KE) e. Employee No.: 98729 (KE) f. Employee No.: 24956 (EE) g. Employee No.: 85012 (EE) h. Employee No.: 24706 (EE) <p>Interviewed with the workers confirmed that they were understood on the terms and conditions outlined in the employment contract. They were also briefed on the terms and condition during induction training.</p> <p>Document verified the payslip confirmed that the management has subsidized RM 13.00 for NUPW subscription fee and insurance. Sampled of payslip as below:</p> <ul style="list-style-type: none"> a. Employee No.: 72005 (EPOM) b. Employee No.: 123747 (EPOM) c. Employee No.: 26467 (KE) d. Employee No.: 104171 (KE) e. Employee No.: 91959 (KE) f. Employee No.: 112644 (KE) g. Employee No.: 92485 (KE) h. Employee No.: 115533 (EE) i. Employee No.: 24957 (EE) j. Employee No.: 136375 (EE) <p>There was one contractor who supplied worker to work in mill started on 1/3/2018 was sighted. The worker with Passport No.: BL0333464 and valid working permit No. PD 9185554 which valid until 23/10/2018 was sighted. Besides, employment contract between the contractor and worker was available.</p>	<p>Complied</p>

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6.5.3 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. - Minor compliance –	Free housing facilities, medical facilities and 35 gallons of water been supplied to all the workers. Site visit to the housing area found that the area was cleaned and grass cutting was carried out twice a month. Interviews with the residents confirmed that the defects they have complained have been rectified by the management. Linesite inspection was carried out on weekly basis in Elphil POM, Kamuning Estate and Elphil Estate by using Housing Complex/ Nest/ Community Hall Inspections form. The inspection was conducted by Assistant Manager and Hospital Assistant of the Mill and Estates. Seen the inspection forms dated 12/2/2018, 19/2/2018, 26/2/2018, 5/3/2018 and 12/3/2018 in Elphil POM, 5/2/2018, 12/2/2018, 19/2/2018, 27/2/2018 and 8/3/2018 in Kamuning Estate and 16/2/2018, 23/2/2018 and 2/3/2018 in Elphil Estate.	Complied
6.5.4 Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food. - Minor compliance –	The mill and estates were located nearby to the town where the workers can easily access to adequate, sufficient and affordable foods. Interviews with the workers confirmed that they purchased the sundry goods from the market which is only 5 minutes’ walk away from their housing.	Complied
Criterion 6.6: 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.		
6.6.1 A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Sime Darby Plantation Berhad has implemented Social Policy dated January 2015 where the management is committed and respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Interviewed with the workers confirmed that they are allowed to join any association.	Complied

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6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	<p>Meeting with NUPW representative was conducted on 8/1/2018 with total 11 participants from management and workers' representatives. No issue was reported from the workers' representatives. Seen the meeting minutes where the management informed the workers regarding their attitude of working and discipline issues.</p> <p>There was a meeting conducted between the management and NUPW members in Kamuning Estate on 17/11/2017. Meeting minutes was sighted and issues reported were recorded in the minutes. Action has been taken such as the management has given the payslip to all the workers every month after the workers informed that they did not receive for 2 months. Interviewed with the NUPW representative and workers confirmed that payslip were given to them every month.</p> <p>Union Meeting was held on 2/3/2018 in Elphil Estate. Issues were recorded in the minutes and actions have been taken to resolve the issue or in progress. For eg: The tractor driver reported that TM003 was in bad condition and it is not safe to use. The Assistant Manager has follow-up with the mechanic and received quotation for the repair of tractor on 8/2/2018. Some minor repair works have been done on 13/3/2018. The management has plan to overhaul the engine and it's in progress.</p>	Complied
Criterion 6.7: Children are not employed or exploited.		
6.7.1 There shall be documentary evidence that minimum age requirements are met. - Major compliance -	The company has developed Child Protection Policy dated January 2015 and they are complied with the minimum age requirement. Through document review on the Employee Master Listing confirmed that all the workers recruited are above 18 years old. Interviewed with the workers found that no child labour been recruited in the plantation.	Complied
Criterion 6.8: 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 -	SDPB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.	Complied
6.8.2 Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Interviewed with a group of foreign workers from different nationalities and female workers confirmed that no discrimination has occurred. They are allowed to request for transfer of job if they found they are unfit for the job offered by management.	Complied

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<p>6.8.3</p> <p>It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has developed Workforce Management Unit Liaison & Recruitment (LR) Procedure with Doc. No. WMU/LR-SOPP/MARCH2016, rev. 0 dated 30/3/2016. The recruitment process was clearly stated in the procedure where the recruitment was based age, medical fitness and etc. There is no any discrimination based on religion, gender, nationality and etc during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc.</p> <p>In the employment contract stated that all the transportation cost, permit, levy and passport fee will be beared by the company. Cross-checked with the management confirmed that they have paid all the cost and verified in the New Workers Allocation Cost summary where agent fee, air fare cost and etc were bear by company. However during interviews with some of the workers (Employee No.: 132419, 138361, 137762 and 132414) from India and Indonesia found that they paid an amount of money (RM 1000 – 4000) to the agents for passport, permit, transportation cost and etc. Thus, the process of recruitment in origin country by the agent was not clear to ensure they follow to the Workforce Management Unit Liaison & Recruitment (LR) Procedure where the workers do not require to pay any cost for the recruitment as it paid by the company.</p>	<p>Minor nonconformance</p>
<p>Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.</p>		
<p>6.9.1</p> <p>Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Policies were displayed at the office’s notice board and briefing was conducted on 6/3/2017 in Elphil POM, 16/10/2017 in Kamuning Estate for workers and 30/10/2017 for contractors.</p>	<p>Complied</p>
<p>6.9.2</p> <p>A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p>	<p>SDPB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Policies were displayed at the office’s notice board and briefing to workers was conducted on 7/3/2017 in Elphil POM, 16/10/2017 in Kamuning Estate for workers and 30/10/2017 for contractors.</p>	<p>Complied</p>

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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 -	Elphil POM and Elphil Estate has established Gender Committee which led by Chief Clerk from Elphil Estate with 10 committee members. The meeting was conducted once every 3 months as per the Gender Committee Handbook, First Edition. The meeting was conducted on 27/4/2017, 26/7/2017, 26/10/2017 and 29/1/2018. Issues raised during the meeting were resolved and reported during the next meeting. Interviewed with the female employees and female residents such as housewives confirmed that no case of sexual harassment been reported. Gender Committee was established in Kamuning Estate to act as a channel for the female workers to express their feelings. The meeting was conducted on quarterly basis and seen the meeting minutes dated 15/8/2017, 10/11/2017 and 24/2/2018. No issue was reported during the meetings. Interviewed with the female employees confirmed that no sexual harassment or violence case been reported so far.	Complied
Criterion 6.10: 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 -	Current and past prices paid for Fresh Fruit Bunches (FFB) has been displayed at the mill weighbridge counter. Pricing was according to the MPOB pricing.	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 -	Elphil Palm Oil Mill has purchased outside FFB crop from traders. The FFB traders have signed on the contract agreement and FFB pricing mechanism was clearly indicated in Third Schedule of the agreement.	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 -	Contract agreement was verified during the audit and sampled of contracts were as below: a. Registration No.: 700973-M for transportation of CPO which valid from 1/5/2016 to 30/4/2019. b. Registration No.: IP0344962-X for grass cutting at mill compound which valid until 30/6/2018. c. Registration No.: 800322-K for FFB trader which valid until 31/12/2018. d. Registration No.: 387039-W for FFB trader which valid until 31/12/2018. e. Registration No.: IP0347269-A for supplying lorry which valid until 31/12/2018. The terms and conditions were stated in the agreement.	Complied
6.10.4 Agreed payments shall be made in a timely manner. - Minor compliance -	The payment terms were clearly stated in the agreement where the payment will be made on monthly basis within 30 days from the date of receipt of the invoice from transporters and contractors. Invoices were submitted to the management and the payment will be made within the agreed term. Seen the payment records for the grass cutting contractor for December 2017 – February 2018 was made accordingly to the term. Interviewed with the contractors confirmed that the payment was made promptly.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
Criterion 6.11: 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 –	<p>The mill and estates' management has made contribution to the local communities such as provided workers' quarter to family members of the worker from far to stay due to some celebration upon request from the worker. Besides, gotong-royong activity was carried out on 25/1/2018 in the housing area to prevent the dengue disease. The mill management has provided cooking oil and rice to the workers once every 2 months. In addition, Muslim workers were provided with transportation to send them to mosque on every Friday for prayer. Kamuning Estate has provided the field for school to organize sport day on 27/9/2017. The temple in the Elphil Estate has requested for donation for the temple festival celebration on 14/5/2017 and the management has approved. Seen the payment voucher dated 6/7/2017 with Doc. No. 1600000406. Besides, the management has made donation to school for sport day, grass cutting for football field at police station, upkeep work at the sundry shop and etc.</p> <p>Interviewed with the school's headmaster confirmed that the management has given a lot of assistance to the school such as helping them to construct the fencing, repair the car porch and etc.</p>	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 –	There was no smallholders involved in SOU 3 Elphil operating unit.	Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.		

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Criterion / Indicator	Assessment Findings	Compliance
<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. Contract of employment in their national language was signed by the workers prior to work. Sampled of foreign workers with valid work permit as below:</p> <ul style="list-style-type: none"> a. Permit No.: PD 9173873 which valid until 25/9/2018 (EPOM) b. Permit No.: PD 9897613 which valid until 27/3/2019 (EPOM) c. Permit No.: PD 7827197 which valid until 25/4/2018 (EPOM) d. Permit No.: PD 9058864 which valid until 17/11/2018 (KE) e. Permit No.: PD 8009148 which valid until 11/6/2018 (KE) f. Permit No.: PD 9655070 which valid until 22/2/2019 (KE) g. Permit No.: PD 8544213 which valid until 27/9/2018 (KE) h. Permit No.: PD 8802720 which valid until 5/8/2018 (KE) i. Permit No.: PD 8234305 which valid until 8/7/2018 (EE) j. Permit No.: PD 9077815 which valid until 23/8/2018 (EE) k. Permit No.: PD 9177795 which valid until 17/11/2018 (EE) l. Permit No.: PD 9178265 which valid until 6/11/2018 (EE) <p>Interviewed with the foreign workers confirmed that they have freedom to go out from the compound during off day.</p> <p>Besides, the workers have acknowledged on Passport Retention Letter/ Passport Custody Declaration to surrender their passport and keep by the management to avoid any loss of passport voluntarily. Seen the Passport Retention Letter for the sampled workers as below:</p> <ul style="list-style-type: none"> a. Employee No.: 118081 (EPOM) b. Employee No.: 132890 (EPOM) c. Employee No.: 133148 (EPOM) d. Employee No.: 115533 (EE) e. Employee No.: 96897 (EE) f. Employee No.: 24706 (EE) g. Employee No.: 24957 (EE) 	<p>Complied</p>
<p>6.12.2</p> <p>Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance -</p>	<p>Interviews with the foreign workers from different countries confirmed that no contract substitution has occurred. The terms and conditions stated in the agreement they signed in home country were the same as they signed in Sime Darby Plantation Berhad.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
6.12.3 Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	<p>SDPB has implemented a Sime Darby's Human Rights Charter on 13/1/2017, version 3.0 where they committed as below:</p> <ul style="list-style-type: none"> a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. Ensuring favourable working conditions e. Enhancing Safety and Health f. And etc. <p>The foreign workers have attended induction training at Sua Betong Estate upon arrival to Malaysia and prior to assign to post at respective estates. Seen the training certificate for the workers that had attended the induction training as below:</p> <ul style="list-style-type: none"> a. Employee No.: 95806 (EPOM) b. Employee No.: 133148 (EPOM) c. Employee No.: 132890 (EPOM) d. Employee No.: 136375 (EE) e. Employee No.: 85012 (EE) f. Employee No.: 96897 (EE) g. Employee No.: 115533 (EE) <p>Besides, the company has provided free housing with facilities to all the workers. Interviewed with the foreign workers confirmed that no contract substitution occurred and they are respected by the management without any discrimination.</p>	Complied
<p>Criterion 6.13: Growers and millers respect human rights.</p>		
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 -	Sime Darby Plantation Berhad has developed the Social and Humanity Management Policy which covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations. Policies were displayed at the office's notice board and briefing to workers was conducted on 7/3/2017 in Elphil POM, 16/10/2017 in Kamuning Estate for workers and 30/10/2017 for contractors.	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
<p>Principle 7: Responsible development of new plantings</p>		
<p>Elphil 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.</p>		
<p>Principle 8: Commitment to continual improvement in key areas of activity</p>		
<p>Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</p>		

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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"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>Action plan for continual improvement has been implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill. Sighted example of continual improvement project at SOU3:</p> <ul style="list-style-type: none"> i) Process improvement – machinery repair and replacement ii)Estate/operation – new tractor and bin for FFB evacuation iii) Recycling of empty chemical container – based on National Recycling Programme iv)Continuous repair/upgrading of workers housing v) Usage of highly toxic pesticide for leaf-eating pest treatment has been replaced with Class III chemical i.e. Acephate 	<p>Complied</p>

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Appendix B: Approved Time Bound Plan

SDP- RSPO Certification Status for Malaysia Operations

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11-Aug-20	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	Mill was closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543594	N.A
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Mill was closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '16	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020, MUTU – RSPO/091	N.A
11	Kerdau	Temerloh, Pahang	7 Jul '16	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019, MUTU-RSPO/094	N.A
12	Jabor	Kuantan, Pahang	7 Jul '16	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049, MUTU-RSPO/092	N.A
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-855480	N.A
14	Tanah Merah	Port Dickson, Negeri	19 May '10	18-May-20	RSPO 541905	

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15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-19	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU-RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '16	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051, MUTU-RSPO/093	N.A
17	Kempas	Jasin, Melaka	19 May '10	18-May-20	RSPO 005	N.A
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	N.A
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-19	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	Mill was closed down.
20	ChaaH	ChaaH, Johor	18 Nov '10	17-Nov-20	RSPO 548299	N.A
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	N.A
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	N.A
23	Ulu Remis	Layang-layang, Johor	11 Apr '16	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042, BV-RSPO-20170705-01	N.A
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BV-RSPO-20170623-01	N.A
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	RSPO 547123	Mill was closed down.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-18	RSPO 537872	N.A
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	N.A
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	N.A
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Mill was closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Mill was closed down.
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	N.A
32	Rajawali	Bintulu, Sarawak	30 Dec '16	29-Dec-21	CU-RSPO-819167, RSPO 0020	N.A
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	N.A

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34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO- 815150, MUTU- RSPO/054	N.A
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Legends

Certification Withdrawal

NA - NOT APPLICABLE

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

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	SGS-RSPO/PC17-00005	N.A
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	3-Jul-18	MUTU-RSPO/027	N.A
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	N.A
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	N.A
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	N.A
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	N.A
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	N.A
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	N.A
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	N.A
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	N.A
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	30-Dec-16	MUTU-RSPO/009	N.A
13		BETUNG		1-April-14	1-April-19	MUTU-RSPO/035	

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14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU-RSPO/001	N.A
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	15-Mar-17	MUTU-RSPO/015	Cert. discontinued – supply bases extended to Rantau POM
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU-RSPO/020	N.A
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	N.A
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Iilir, Riau	01-Dec-16	30-Nov-21	MUTU-RSPO/008	N.A
19		MANDAH		1 April 2014	1 April 2019	MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	N.A
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	N.A
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	N.A
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	3-May-18	MUTU-RSPO/026	N.A
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-19	MUTU-RSPO/044	N.A
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab. Sanggau, Kalimantan Barat	NA	NA	NA	N.A

Legends

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

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2017 for Elphil 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 Elphil Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.18
PK	1.18

Extraction	%
OER	20.51
KER	5.77

Production	t/yr
FFB Process	183,892.47
CPO Produced	37,713.83
PKO Produced	10,618.77

Land Use	Ha
OP Planted Area	11,025.29
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	11,025.29

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	51,885.2	0.52	426.13	0.46	0	0	52,311.33	0.98
CO ₂ Emission from fertilizer	6,336.49	0.06	52.9	0.05	0	0	6,389.39	0.11
NO ₂ Emmission	5,900.36	0.06	40.22	0.04	0	0	5,940.58	0.1
Fuel Consumption	598.49	0.01	10.1	0.01	0	0	608.59	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-49,180.29	-0.49	-425.27	-0.45	0	0	-49,605.56	-0.94
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	15,540.25	0.15	104.08	0.11	0	0	15,644.33	0.26

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**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	28,836.83	0.16
Fuel Consumption	55.06	0
Grid Electricity Utilisation	1,862.74	0.01
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	30,754.63	0.17

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	12,549.76
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	20
Divert to anaerobic diversion (%)	80

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

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

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence	Compliance
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.	Elphil Palm Oil Mill takes legal ownership and physically handles its RSPO certified oil palm products i.e. 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.	Elphil POM is not a trading company. Therefore, this requirement is not applicable.	NA
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.	The parent company (Sime Darby Plantation Sdn Bhd) is the member of RSPO [membership no.: 1-0008-04-000-00] and the mill is registered in the PalmTrace system [member ID: RSPO_PO1000000191].	Yes
5.1.4	Processing aids do not need to be included within an organization's scope of certification.	Processing aids are not used in the milling process.	Yes
5.2 Supply chain model			
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.	The FFB suppliers are of RSPO certified estates which consists of Elphil certification unit, other Sime Darby group estates and surrounding smallholders. Declassification of the CPO or PK was done in accordance to the correct order.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Elphil POM is MB certified and sales of the products were of MB or conventional only.	Yes
5.3. Documented Procedures			

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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"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	<p>Procedure for supply chain has been established entitled "Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability" [appendix 15 of the Sustainable Plantation Management System (SPMS)], version 2, dated Feb 2018.</p> <p>Among the subjects covered in the procedure are</p> <ul style="list-style-type: none"> • Responsibilities • control of documents & records • delivery of FFB from the estate • receiving FFB at the mill • process monitoring • CPO and PK dispatch • Non-conforming products and/or documents • Product claims • Outsourced contractor • Training • Reclassification of mill's supply chain model • Production volume • Conversion factors • Internal audit • Complaints • Management review 	No
	<ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	<p>Among the records included in the procedures are:</p> <ul style="list-style-type: none"> • Weighbridge tickets • Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document • Daily production report • Record and balance <p>All the records were found to be up-to-date.</p>	Yes
	<ul style="list-style-type: none"> • 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. 	<p>Addressed in the SOP for Sustainable Supply Chain and Traceability, clause 4.0. The assigned persons are the Head of Operating Unit where in this case the Mill Manager. Based on interview, the person in-charge was able to demonstrate the implementation of their procedures in accordance to the standard requirements.</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</p>	<p>Addressed in the SOP for Sustainable Supply Chain and Traceability, clause 17.0. Based on the procedure, the internal audit is to be conducted</p>	Yes

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	RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	annually in accordance to Internal Audit Procedure (SD/SDP/PSQM/IAP).	
	ii) effectively implements and maintains the standard requirements within its organization	Internal audit for supply chain was last conducted on 7/3/2018 by 2 internal auditor sourced from other department (PSQM). There were 5 NCRs and 3 OFIs raised as the results of the audit.	Yes
5.4. Purchasing and goods in			
5.4.1	<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"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the DO is as follows:</p> <ul style="list-style-type: none"> • Consignment note no. • Estate's names • Date & time of delivery • Field No. • No. of bunches • Vehicle no. • Seal no. <p>E.g. of information available in the mill's weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> • Weighbridge ticket no.: • Name of estates • Field No. • Name of driver • Vehicle no. • Date & time in/out • Total bunches • Seal no. • Net weight 	Yes
	<ul style="list-style-type: none"> • 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). 	The information was available in various documents such as delivery order and weighbridge tickets.	Yes
	<ul style="list-style-type: none"> • 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 	The mill has a list of certified FFB suppliers which has the information about certificate number and validity period. This is applied to both second and third party FFB suppliers [ref.: clause 7.2 of SOP for Sustainable	Yes

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	Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.	Supply Chain and Traceability.	
	<ul style="list-style-type: none"> 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 (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 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. 	The internal audit has found a lapse that there is no RSPO certificate for all diverted crops sent to Elphil Mill, e.g. from SOU Chersonese. Elphil POM has satisfactorily rectified this issue by obtaining the information about the certified suppliers.	Yes
		NA – the mill does not purchase FFB from any trader.	N/A
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Addressed in the SOP clause 10.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: IP to MB to conventional.	Yes
5.5. Outsourcing activities			
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 independence 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>	<p>Ref.: Agreement between Sime Darby Plantation Bhd and Mayang Bayumas Sdn Bhd., dated 19/12/2017. Requirement to adhere to RSPO Supply Chain Standard is stated in clause 3 Sustainability and Traceability of Product.</p> <p>The internal audit has found a lapse that the independent third parties/subcontractors are yet to be informed on the new requirements of the RSPO SCC Standard on outsourced activities. No records of training available for CPO transporter (Mayang Bayumas Sdn Bhd). The mill has rectified the issue by conducting a stakeholder meeting and convey the new requirements to the relevant contractor.</p>	Yes

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5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a. The site has legal ownership of all input material to be included in outsourced processes;	Not applicable. No outsourcing activity.	NA
	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.	Not applicable. No outsourcing activity.	NA
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	Not applicable. No outsourcing activity.	NA
	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.	Not applicable. No outsourcing activity.	NA
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.	Not applicable. No outsourcing activity.	NA
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.	Not applicable. No outsourcing activity.	NA
5.6. Sales and goods out			
5.6.1	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including 	Elphil POM ensured the required information is available in document form. Sampled contract: S/C-PSD/1801/CPO0039C, dated 27/12/2017, quantity 250 mt <ul style="list-style-type: none"> • The name and address of the buyer; XXX • The name and address of the seller; KKS Elphil, Bt 6, Jln Lintang, 	Yes

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	<p>the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</p> <ul style="list-style-type: none"> • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<p>31100 Sg Siput (U), Perak</p> <ul style="list-style-type: none"> • The loading or shipment/ delivery date; e.g. 8/1/2017 • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Crude Palm Oil (CPO) RSPO MB • The quantity of the products delivered; e.g. 42.29 mt • Any related transport documentation; e.g. Despatch note e.g. #010568 • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 550180 • A unique identification number • Available in a few forms e.g. DN no., seal no., etc. 	
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>Information is complete and available in various documents such as sales contract, mill weighbridge ticket, delivery note, transporter collection order.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • 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. 	<p>Since the last assessment, there was one shipping announcement of CSPK and 2 credit allocation announcement for CSPO made.</p>	<p>Yes</p>
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> • are mills, traders, crushers and refineries and; • 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 	<p>The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace.</p>	<p>Yes</p>

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	register their transaction in the RSPO IT platform and confirm upon receipt where applicable.		
5.7.2	The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> 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. 	Based on the announcement summary, all the registrations were found to be in order.	Yes
	<ul style="list-style-type: none"> 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. 	Not applicable. Products are not sold beyond refinery.	Yes
	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	Based on the MB accounting, the removal of volumes was done correctly when the products were sold as conventional.	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Based on the announcement summary, all the confirmations were found to be in order.	Yes
5.8. Training			
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.	Training plan for 2017/2018 were available which training for RSPO Supply Chain has been included.	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.	Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor & assistant, weighbridge operators, auxiliary police. In Elphil POM case, 13 personnel were identified.	Yes

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		The training was conducted two times due to availability of the staff. One was on 7/3/2018 and the other was on 9/3/2018. Contents of training includes the standard requirements, certification system and communication & claim.	
5.9. Record Keeping			
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.	All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible.	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.	As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained minimum of two years.	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.	Not applicable. The product of the facility is containing 100% palm oil.	Yes
5.10. Conversion factors			
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 (www.rspo.org); 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.	Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year's average were 20.71% (OER) & 5.48% (KER).	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
5.11. Claims			
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	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules	Yes

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	the RSPO Rules on Market Communications and Claims.	on Market Communications and Claims.	
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Addressed in Section 18 of the supply chain SOP. Should there be any complaints from stakeholders pertaining supply chain issues, it will be handled through Procedure for External Communication in PQMS SOM Sub-Section 5.5 Appendix 5.5.3.2. There has been no complaint from any third party with regards to supply chain so far.	Yes
5.13. Management Review			
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.	Management review was last conducted on 9/3/2018. It was chaired by En Azman B Talkah (MM) and attended by 7 mill staff which include AMs, Head of AP, office clerk, lab supervisor, quality supervisor and mill supervisor.	Yes
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> • 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. 	Based on the minutes of meeting, the following agendas were adequately recorded: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. (item 1.8) • Customer feedback. (item 1.0.1) • Status of preventive and corrective actions. (item 1.8) • Follow-up actions from management reviews. (item 1.0.2) • Changes that could affect the management system. (item 3.0) • Recommendations for improvement. (item 4.0) 	Yes
5.13.3	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	Discussion about the improvement of the effectiveness of the management system and its processes, and any resource needs were found to be included in the meeting minute.	Yes

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

Requirements	Compliance
E.1 Definition	
<p>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.</p>	<p>Elphil Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>
E.2 Explanation	
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall 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 shall 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.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. (see Table 10)</p>
<p>E.2.2 The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>
E.3 Documented procedures	
<p>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:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p>	<p>Latest written documented procedures for the chain of custody is with Mass Balance (IMB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version:2, issue: 2 dated February 2018. This developed based on the RSPO SCCS July 2017. The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive.</p>
<p>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.</p>	<p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>
<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>The receiving and processing certified and non-certified FFBs procedure is addressed in the same procedure mentioned in E.3.1.</p>

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<p>E.4 Purchasing and goods in</p>	
<p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBS received.</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Records verified by internal and external audit.</p> <p>The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate’s ticket number is recorded in the mill’s ticket number.</p> <p>For non-certified third party crop (e.g. Eng Huat Latex Concentrate Sdn Bhd and Tang Tatt Trading Sdn Bhd), they presents their DO to the mill and mill’s issues weighbridge ticket as confirmation of receipt.</p>
<p>E.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>Addressed in the Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability” [appendix 15 of the Sustainable Plantation Management System (SPMS)], version 2, dated Feb 2018, Clause 15. There was no projected overproduction for the period under review.</p>
<p>E.5 Record keeping</p>	
<p>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.</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Computerized system in place. Records verified by internal and external audit.</p>
<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 by RSPO.</p>	<p>Computerized system in place with the delivery deducted accordingly.</p>
<p>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.(ie product can be sold before it is in stock.)</p>	<p>Based on verification of MB accounting which the mill opted for three-monthly basis recording, it was found that the certified CPO was always delivered from positive stock. However, for delivery of certified PK, the mill some cases such as Q1 & Q2 of 2017 was found to be oversold. Therefore, a non-conformity was assigned due to this lapse.</p>

Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (MT)	Volume of FFB from uncertified supply bases (MT)	Total FFB/Month (mt)
1	Mar 2017	6,790.91	3,182.03	9,972.94
2	Apr 2017	9,948.25	6,393.95	16,342.2
3	May 2017	8,862.24	6,457.78	15,320.02
4	June 2017	8,490.9	5,843.67	14,334.57
5	July 2017	9,742.47	9,410.7	19,153.17
6	Aug 2017	10,226.35	8,717.44	18,943.79
7	Sept 2017	9,765.1	8,367.57	18,132.67
8	Oct 2017	8,751.83	8,997.77	17,749.6
9	Nov 2017	8,804.2	9,939.7	18,743.9
10	Dec 2017	7,290.7	8,793.55	16,084.25
11	Jan 2018	7,125.27	8,443.9	15,569.17
12	Feb 2018	4,597.27	5,941.35	10,538.62
	TOTAL	100,395.49	90,489.41	190,884.90

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Mar 2017	1394.17	391.84
2	Apr 2017	2042.38	574.01
3	May 2017	1819.42	511.35
4	June 2017	1743.18	489.92
5	July 2017	2000.13	562.14
6	Aug 2017	2099.47	590.06
7	Sept 2017	2004.78	563.45
8	Oct 2017	1796.75	504.98
9	Nov 2017	1807.50	508.00
10	Dec 2017	1496.78	420.67
11	Jan 2018	1462.82	411.13

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12	Feb 2018	943.82	265.26
	TOTAL	20,611.19	5,792.82

C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) records base on transaction January 2017-December 2017				
No.	Buyers Name	Palmtrace Trading No	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Non-disclosure	TR-8e002a18-a466	-	200
2	Non-disclosure	TR-045abc3a-376c	-	270
	TOTAL		-	470

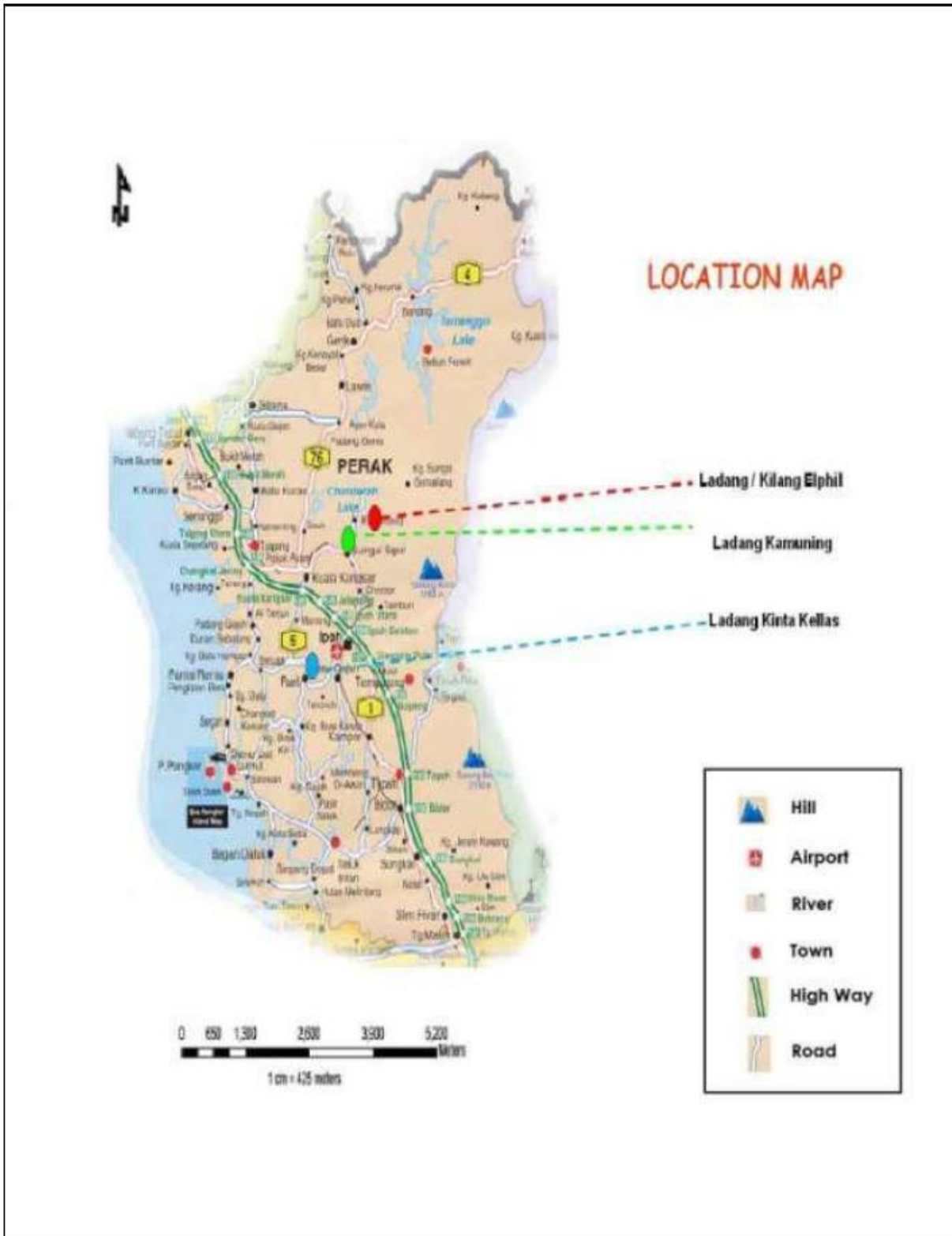
D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (MT)	PK Sold (MT)
-Nil-				

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)				
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)	
1	XXX	20,111.19	-	
2	XXX	-	5,322.82	

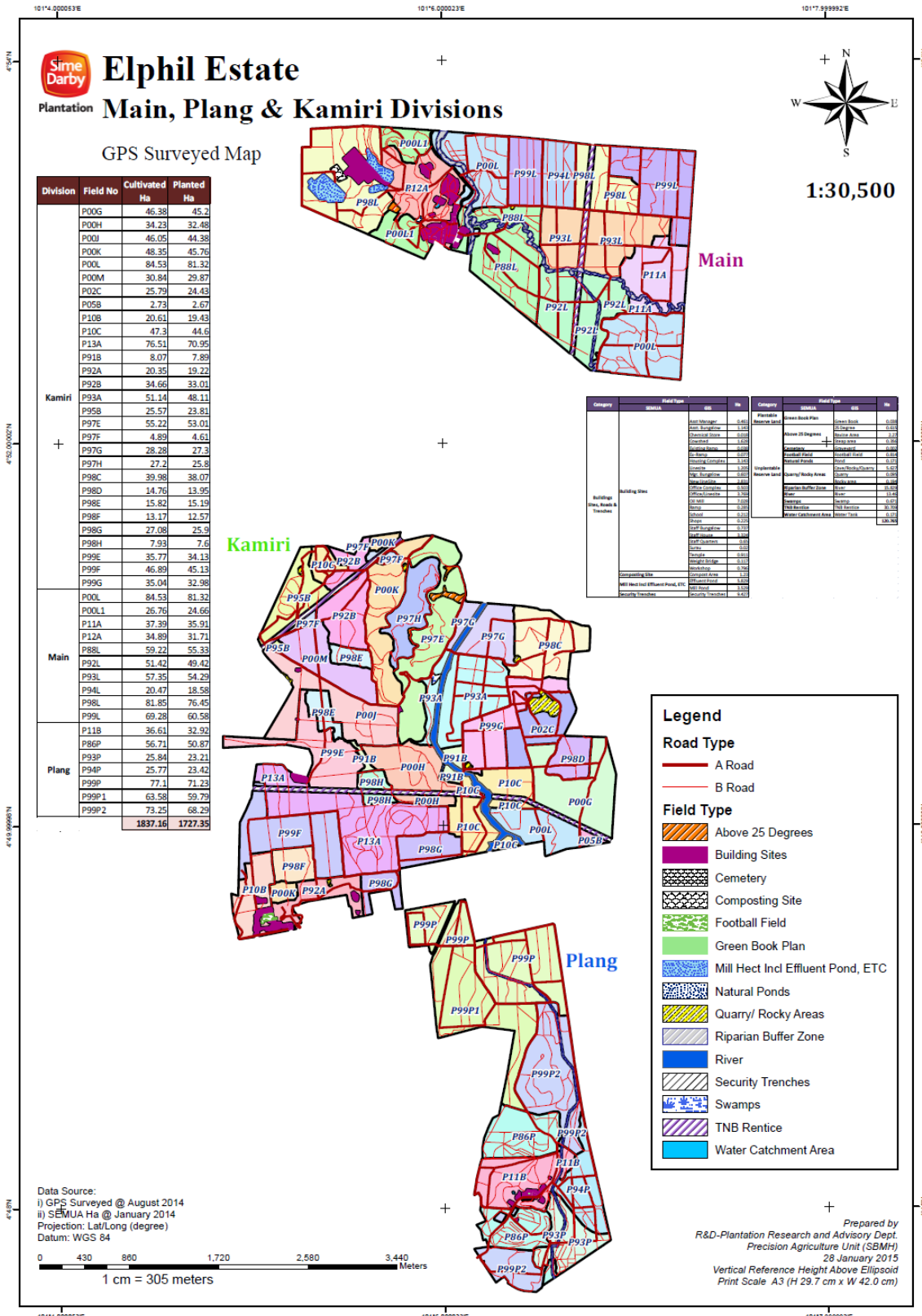
*Physical volume for credit sales add in to conventional sales.

F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading No	RSPO Credits of Certified CPO Sold (MT)
1	Non-disclosure	ST-TR-049a5337-3b95	1,500
2	Non-disclosure	ST-TR-fcc7b2c4-9f14	3,000

Appendix F: Location Map of Elphil Palm Oil Mill and Supply bases



Appendix G: Elphil Estate Field Map



Appendix H: Kamuning Estate Field Map



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

Not applicable

Appendix J: List of Abbreviations

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
CU	Certification Unit
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
MRM	Management Review Meeting
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
SDPSB	Sime Darby Plantation Sdn Bhd
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SOU	Strategic Operating Unit