

**RSPO PRINCIPLE AND CRITERIA –  
3<sup>rd</sup> ANNUAL SURVEILLANCE ASSESSMENT (ASA1\_3)  
Public Summary Report**

<b>Sime Darby Plantation Berhad</b>
Head Office: <b>Level 3A, Main Block, Plantation Tower                  No. 2, Jalan P.J.U 1A/7                  47301 Ara Damansara                  Selangor, Malaysia</b>
Certification Unit: <b>Strategic Operating Unit (SOU 9)                  West Palm Oil Mill</b>
Location of Certification Unit: <b>Ladang West                  42960 Carey Island                  Selangor, Malaysia</b>

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	06/09/2004
<b>Parent Company Name</b>	Sime Darby Plantation Berhad		
<b>Address</b>	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia		
<b>Subsidiary (Certification Unit Name)</b>	Strategic Operating Unit (SOU 9) – West Palm Oil Mill		
<b>Address</b>	Ladang West, 42960 Carey Island, Selangor, Malaysia		
<b>Contact Name</b>	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Haji Mazlan Bin Abdullah		
<b>Website</b>	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>	<b>E-mail</b>	<a href="mailto:mazlan.abdullah.ghp@simedarby.com">mazlan.abdullah.ghp@simedarby.com</a>
<b>Telephone</b>	+6012 -581 2769 +603 – 3122 0346/48	<b>Facsimile</b>	+603 – 3122 0375

2. Certification Information			
<b>Certificate Number</b>	RSPO 543594	<b>Date of First Certification</b>	19/05/2010
		<b>Certificate Start Date</b>	19/05/2015
		<b>Certificate Expiry Date</b>	18/05/2020
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production from West Palm Oil Mill and Supply Base (West Estate)		
<b>Applicable Standards</b>	1) RSPO Principle & Criteria MYNI-2014 2) RSPO Supply Chain Certification Standard: June 2017 relevant module for CPO Mills		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682052	MS 2530-4:2013 Malaysia Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	12/02/2023
MSPO 690774	MS 2530-3:2013 Malaysia 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
West Palm Oil Mill	KKS West, Carey Island, 42960, Selangor	2° 54' 20.6" N	101° 21' 35.8" E
West Estate	Ladang West, Carey Island, 42960, Selangor	2° 53' 22" N	101° 21' 38" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
West	5,064.64	157.00	691.05	5,912.69	86
<b>Total</b>	5,064.64	157.00	691.05	5,912.69	86

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
West	325.25	1,468.36	2,771.37	499.66	-	4,739.39	325.25
<b>Total (ha)</b>	325.25	1,468.36	2,771.37	499.66	-	4,739.39	325.25

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Feb 2017 – Jan 2018)	Actual (Feb 2017 – Jan 2018)	Forecast (Feb 2018 – Jan 2019)
West	129,788.61	142,834.18	125,483.00
<b>Total</b>	129,788.61	142,834.18	125,483.00

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estates	Tonnage / year		
	Estimated (Feb 2017 – Jan 2018)	Actual (Feb 2017 – Jan 2018)	Forecast (Feb 2018 – Jan 2019)
East	NA	80,876.74	77,759.94
Sepang	NA	1,734.97	NA
Dusun Durian	NA	4,612.86	NA
Labu	NA	49.03	NA

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New Labu	NA	10.77	NA
<b>Total</b>	NA	87,284.37	NA

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
Independent FFB Supplier	Tonnage / year		
	Estimated (Feb 2017 – Jan 2018)	Actual (Feb 2017 – Jan 2018)	Forecast (Feb 2018 – Jan 2019)
N/A			
<b>Total</b>			

<b>10. Certified Tonnage</b>			
Mill Capacity: 50 MT/hr	Estimated (Feb 2017 – Jan 2018)	Actual (Feb 2017 – Jan 2018)	Forecast (Feb 2018 – Jan 2019)
	FFB	FFB	FFB
	***291,105.69 mt	*230,118.55 mt	**203,242.94 mt
SCC Model: IP/MB	CPO (OER: 22.00%)	CPO (OER: 19.89%)	CPO (OER: 21.45%)
	***64,043.25 mt	45,765.74 mt	43,603.59 mt
	PK (KER: 4.75%)	PK (KER: 4.67%)	PK (KER: 5.50%)
	***13,827.52 mt	10,750.23 mt	11,178.36 mt

\*the FFB total of Own Certified Scope and from other certified units

\*Increase in FFB yield. Estate managed to achieve yield per hectare (YPH) at 28.89mt compared to budgeted YPH of 28.17mt (increased of 2.56%). High crop trend in the Financial Year (Aug-Dec'17) and good crop recovery by the Estate Management was also the reasons of high crop achieved.

\*\*Reduction of 4.8% mature hectarage (4,512.10 hectare) compared to the previous year (4,739.39 hectare) due to replanting fields, which resulted in low volume of crop forecast. Besides, high hectarage for immature area of 191.48 hectare which will coming to maturity.

\*\*\*volume extension requested on 07/09/2017 and 21/03/2018. Volume extended on 07/09/2017 for CPO = 26,510mt and PK = 5,273mt. Volume extended on 21/03/2018 for CPO = 9,639mt and PK = 2,312mt. Total FFB extended on 07/09/2017 = 113,117.69mt and on 21/03/2018 = 48,199mt. Volume extended due to estimation of FFB diversion from East Estate.

<b>11. Actual Sold Volume (CPO) (Feb 2017 – Jan 2018)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>CPO (MT)</b>	10,428	-	-	36,201.90	46,629.90

Note: There is 864.16mt CPO that was produced in January 2017 and brought forward sold in period of Feb 2017-Jan 2018.

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<b>12. Actual Sold Volume (PK)</b> (Feb 2017 – Jan 2018)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>PK (MT)</b>	5,450	-	-	5,551.87	11,001.87

*Note: There is 251.64 PK that was produced in January 2017 and brought forward sold in period of Feb 2017-Jan 2018.*

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

## Section 2: Assessment Process

### Certification Body:

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

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 (ASI-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 annual surveillance assessment was conducted from 13-14/2/2018. The audit programme is included in Section 2.3. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The 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 30<sup>th</sup> 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.
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where  $y$  is total number of independent group member and where  $z$  is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.



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

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

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
West Palm Oil Mill	✓	✓	✓	✓	✓
West Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit:** February 13, 2019 - February 14, 2019

**Total No. of Mandays:** 6

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Valence Shem (VS)	Audit Team Leader	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.
Mohd Hafiz Mat Hussain (MH)	Audit Team Member	He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2016. He had been involved in ISO9001, ISO14001 and OHSAS 18001 auditing since May 2013 within Malaysia, Brunei, Indonesia and RSPO auditing within Malaysia, Papua New Guinea, Solomon Islands, Gabon and Liberia. During this assessment, he assessed on the aspects of legal, mill best practices, SCC for CPO mill, estate best practices, safety and health, environmental and workers and stakeholders consultation.
Elzy Ovktafia (EO)	Audit Team Member	She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2 <sup>nd</sup> Party Audit for Social Compliance Programme (URSA, ETI) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.

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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).

Date	Time	Subjects	VS	MH	EO
Tuesday 13/2/2018  <b>West POM</b>	0830-0900	Opening meeting: <ul style="list-style-type: none"> <li>Opening presentation by audit team leader</li> <li>Confirmation of assessment scope and finalize audit plan (including stakeholder’s consultation)</li> </ul>	✓	✓	✓
	0900-1300	<b>West POM</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders	✓	✓	✓
	1000 - 1100	<b>Stakeholder consultations:</b> Client to invite the relevant stakeholders for <b>both mill and estates</b> which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative)			✓
	1300-1400	Lunch break	✓	✓	✓
	1400-1630	<b>West POM</b> 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. Verify previous nonconformities.	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓
Wednesday 14/2/2018  <b>West Estate</b>	0830-1300	<b>West Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill.	✓	✓	✓
	1300-1400	Lunch break	✓	✓	✓

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	1400-1530	<b>West Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation)	✓	✓	✓
	1530-1630	Verify any outstanding issues & preparation for closing meeting	✓	✓	✓
	1630-1700	Closing meeting	✓	✓	✓

### Section 3: Assessment Findings

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

- Sime Darby Plantation Berhad Time Bound Plan
- RSPO P&C 2013 Generic Checklist
- RSPO Group Certification Standard 2016 Checklist
- RSPO Supply Chain Certification Checklist November 2014, revised 14 June 2017
- RSPO P&C GA-NIWG 2017 Checklist
- RSPO P&C INA-NIWG 2016 Checklist
- RSPO P&C MY-NIWG 2014 Checklist
- RSPO P&C PNG-NIWG 2017 Checklist

#### 3.2 Progress against Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
<b>Summary of the Time Bound Plan</b>		
Does the plan include all subsidiaries, estates and mills?	The time bound plan includes all 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.	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. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2018.	Yes
Is the time bound plan challenging?  <ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul>	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 satisfactory resolution of the matter. For Indonesia operation, the	Yes

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	<p>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, <a href="http://www.rspo.org/members/disputesettlement-facility/status-of-disputes#007">http://www.rspo.org/members/disputesettlement-facility/status-of-disputes#007</a> .</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. 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 on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2019. Liberia- A new mill to be 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 completed. External pre-assessment also completed end 2017. Main assessment planned to be conducted on Mar 2018.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>Up to date, there is no comment. 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 time bound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified. 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. External pre-assessment also completed end 2017. Main assessment planned to be conducted on Mar 2018.</p>	<p>Yes</p>
<p>If yes, have the newly acquisitions certified within a three-year timeframe?</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</p>	<p>Yes</p>

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	assessment against the draft Liberia NI has been completed and closing of gaps is in completed. External pre-assessment also completed end 2017. Main assessment planned to be conducted on Mar 2018.	
Have there been any isolated lapses in implementation of the plan?	No lapses.	Yes
<b>Un-Certified Units or Holdings</b>		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	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 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	A new mill will be 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 progress.  *Note: RSPO NPP Announcements for SDP can be found at <a href="http://www.rspo.org/certification/newplanting-procedures/publicconsultations/page/14">http://www.rspo.org/certification/newplanting-procedures/publicconsultations/page/14</a>	Yes
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.	Sime Darby (Liberia) Plantation Inc. Status: Box H - Close for Monitoring Further details please refer to: <a href="http://www.rspo.org/members/complaints/statusof-complaints/view/46">http://www.rspo.org/members/complaints/statusof-complaints/view/46</a>  PT Mitra Austral Sejahtera (Sime Darby Sdn Bhd) Further details please refer to: <a href="http://www.rspo.org/members/complaints/statusof-complaints/view/29">http://www.rspo.org/members/complaints/statusof-complaints/view/29</a>	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No stakeholder comments or complaints received.	Yes
Any Legal non-compliance is being addressed through	None noted. No stakeholder comments or complaints received.	Yes

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measures consistent with the requirements of RSPO P&C criteria 2.1		
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes.	Yes

**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	NA

**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 six (6) Major & zero (0) Minor nonconformities raised. The West 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.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1590312-201801-M1	<b>Clause &amp; Category (Major / Minor)</b>	Major
<b>Date Issued</b>	14/2/2018	<b>Due Date</b>	15/4/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/4/2018
<b>Statement of Nonconformity:</b>	Compliance to the EMPLOYMENT ACT 1955 is not effectively implemented.		
<b>Requirement Reference:</b>	Indicator 2.1.1 Evidence of compliance with relevant legal requirements shall be available.		



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<b>Objective Evidence:</b>	<p>West Estate: As per EMPLOYMENT ACT 1955, Work on rest day: 60. (d) In the case of an employee employed on piece rates who works on a rest day, he shall be paid twice his ordinary rate per piece. However, sampled worker’s pay slips showed that working on Sunday for worker ID (India): 103990 is not having the double paid which is incompliance with Malaysia Employment Act 1955. The sampled pay slips are as below: a. Estate worker ID (India): 103990, pay slip for June 2017.</p>
<b>Corrections:</b>	<p>The West Estate management temporarily not offering task during the rest day. Management had agreed to reimburse double pay to the affected workers.</p>
<b>Root Cause Analysis:</b>	<p>Misinterpretation of the Employment Act 1955, Part X11 – (60) Work on rest day. i.e. the management thought that if a worker voluntary works on rest day, no double pay applies. Only when a worker is asked by the management to work on rest day will the management pay double rate. Management offered the task upon on the requested by the workers and the working hours was not exceeding 4 hours. The salary paid as piece rated, higher than salary paid on daily rate.</p>
<b>Corrective Actions:</b>	<p>1) The management will issue the official memo on the works on rest day as per Employment Act 1955, part X11 – (60) Work on rest day. 2) If the management required to working on the rest day, the double pay is applicable to the workers.  There is a specific mechanism for the double pay. The clerk will key in ‘02’ in the checkroll system which is means double pay applicable. This method using for the harvester gang during the Sunday harvesting.</p>
<b>Assessment Conclusion:</b>	<p>The submitted evidence i.e. - System printout of the reimbursement to the affected workers - A memo dated 1/4/2018 from the management to the employee informing the applicability of double pay when work is done on rest day. Copy of the memo was given to West Estate’s NUPW. was found to be sufficient to close the NCR. The NCR was effectively closed on 15/4/2018. Continuous implementation shall be verified in the next assessment.</p>

<b>Nonconformity</b>			
<b>NCR Ref #</b>	1590312-201801-M2	<b>Clause &amp; Category (Major / Minor)</b>	Major
<b>Date Issued</b>	14/2/2018	<b>Due Date</b>	15/4/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/4/2018
<b>Statement of Nonconformity:</b>	The internal audit has yet to be conducted. The written procedure (SOP for Sustainable Supply Chain and Traceability, dated Feb 2018) was not adequately implemented.		
<b>Requirement Reference:</b>	SCCS Indicator 5.3.2 The site shall have a written procedure to conduct annual internal audit to determine whether the organization;		

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	<ul style="list-style-type: none"> <li>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>ii) effectively implements and maintains the standard requirements within its organization</li> </ul>
<b>Objective Evidence:</b>	The internal audit has yet to be conducted.
<b>Corrections:</b>	The Internal audit for SCCS will be carried out during the RSPO P&C audit by the PSQM Team. The SQM regional will conduct the internal Supply Chain before end of the Mac 2018.
<b>Root Cause Analysis:</b>	The SOP of the supply chain develop by the PSQM. The latest of the SOP dated October 2017 was not incorporated the latest standard of SCCS revised June 2017 . However, for the internal audit mentioned the RSPO in the Internal Audit Procedure (IAP) as RSPO (audit) and no specific mention for SCCS.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>1) To review and include the internal audit procedure in the existing SOP which is specific for the SCCS.</li> <li>2) PSQM in the midst preparation to develop the latest SOP and to include the latest requirement as mention in the SCCS standard revised June 2017.</li> </ul>
<b>Assessment Conclusion:</b>	<p>The submitted evidence i.e.</p> <ul style="list-style-type: none"> <li>- RSPO SCCS Internal Audit report dated 8/3/2018</li> <li>- Newly revised supply chain SOP (Feb 2018) where internal audit has been incorporated in the procedure at Section 17</li> </ul> <p>was found to be sufficient to close the NCR. The NCR was effectively closed on 15/4/2018. Continuous implementation shall be verified in the next assessment.</p>

<b>Nonconformity</b>			
<b>NCR Ref #</b>	1590312-201801-M3	<b>Clause &amp; Category (Major / Minor)</b>	Major
<b>Date Issued</b>	14/2/2018	<b>Due Date</b>	13/4/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/4/2018
<b>Statement of Nonconformity:</b>	Management review on RSPO supply chain implementation has yet to be conducted.		
<b>Requirement Reference:</b>	SCCS Indicator 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.		
<b>Objective Evidence:</b>	There is no evidence that management review has been conducted which contains the input and output according to the RSPO SCCS standard.		
<b>Corrections:</b>	The Management Review meeting, will be conducted after completed the internal audit.		
<b>Root Cause Analysis:</b>	The SOP of the supply chain develop by the PSQM. The latest of the SOP dated October 2017 was not incorporated the latest standard of the RSPO SCCS revised June 2017		
<b>Corrective Actions:</b>	To incorporate the specific output or issues need to be concern during the management review meeting process.		
<b>Assessment Conclusion:</b>	The submitted evidence i.e.		

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	<ul style="list-style-type: none"> <li>- Minutes of management review meeting dated 12/3/2018 – all the input and output of management review according to the standard’s requirements have been recorded in the minutes</li> <li>- Newly revised supply chain SOP (Feb 2018) where management review meeting has been incorporated in the procedure at Section 19 was found to be sufficient to close the NCR. The NCR was effectively closed on 15/4/2018. Continuous implementation shall be verified in the next assessment.</li> </ul>
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<b>Nonconformity</b>			
<b>NCR Ref #</b>	1590312-201801-M4	<b>Clause &amp; Category (Major / Minor)</b>	Major
<b>Date Issued</b>	14/2/2018	<b>Due Date</b>	15/4/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/4/2018
<b>Statement of Nonconformity:</b>	Management review on RSPO supply chain implementation has yet to be conducted.		
<b>Requirement Reference:</b>	SCCS Indicator 5.13.2 The input to management review shall include information on: <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>		
<b>Objective Evidence:</b>	There is no evidence that management review has been conducted which contains the input and output according to the RSPO SCCS standard.		
<b>Corrections:</b>	The management review meeting will be conducted on 1 mac 2018. 1) To include the clause of the Management Review. 2) To incorporate the specific output or issues need to be concern during the management review meeting process.		
<b>Root Cause Analysis:</b>	The SOP of the supply chain develop by the PSQM. The latest of the SOP dated October 2017 was not incorporated the latest standard of the RSPO SCCS revised June 2017		
<b>Corrective Actions:</b>	PSQM in the midst preparation to develop the latest SOP and to include the latest requirement as mention in the SCCS standard revised June 2017.		
<b>Assessment Conclusion:</b>	The submitted evidence i.e. <ul style="list-style-type: none"> <li>- Minutes of management review meeting dated 12/3/2018 – all the input and output of management review according to the standard’s requirements have been recorded in the minutes</li> <li>- Newly revised supply chain SOP (Feb 2018) where management review meeting has been incorporated in the procedure at Section 19 was found to be sufficient to close the NCR. The NCR was effectively closed on 15/4/2018. Continuous implementation shall be verified in the next assessment.</li> </ul>		

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Nonconformity			
<b>NCR Ref #</b>	1590312-201801-M5	<b>Clause &amp; Category (Major / Minor)</b>	Major
<b>Date Issued</b>	14/2/2018	<b>Due Date</b>	15/4/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/4/2018
<b>Statement of Nonconformity:</b>	Management review on RSPO supply chain implementation has yet to be conducted.		
<b>Requirement Reference:</b>	SCCS Indicator 5.13.3 The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>		
<b>Objective Evidence:</b>	There is no evidence that management review has been conducted which contains the input and output according to the RSPO SCCS standard.		
<b>Corrections:</b>	The management review meeting will be conducted on 1 mac 2018. 1) To include the clause of the Management Review. 2) To incorporate the specific output or issues need to be concern during the management review meeting process.		
<b>Root Cause Analysis:</b>	The SOP of the supply chain develop by the PSQM. The latest of the SOP dated October 2017 was not incorporated the latest standard of the RSPO SCCS revised June 2017.		
<b>Corrective Actions:</b>	PSQM in the midst preparation to develop the latest SOP and to include the latest requirement as mention in the SCCS standard revised June 2017.		
<b>Assessment Conclusion:</b>	The submitted evidence i.e. - Minutes of management review meeting dated 12/3/2018 – all the input and output of management review according to the standard’s requirements have been recorded in the minutes - Newly revised supply chain SOP (Feb 2018) where management review meeting has been incorporated in the procedure at Section 19 was found to be sufficient to close the NCR. The NCR was effectively closed on 15/4/2018. Continuous implementation shall be verified in the next assessment.		

Nonconformity			
<b>NCR Ref #</b>	1590312-201801-M6	<b>Clause &amp; Category (Major / Minor)</b>	Major
<b>Date Issued</b>	14/2/2018	<b>Due Date</b>	15/4/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/4/2018
<b>Statement of Nonconformity:</b>	The standard requirement on record and balance shall be done on real-time basis was not implemented.		
<b>Requirement Reference:</b>	SCCS Indicator D.5.1		

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	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.
<b>Objective Evidence:</b>	The record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on real-time basis was not available for verification.
<b>Corrections:</b>	The Mill will establish the mass balance monitoring with referring the data from the production record and delivery records to the buyers.
<b>Root Cause Analysis:</b>	There is no mass balance template for monitoring the records of the receipt and delivery on the real time basis.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1) Mill management will appoint the person in-charge to monitor and update all the product balance.</li> <li>2) The monitoring result will be discussed in the management meeting and to review the total dispatch and balance of the certified product.</li> <li>3) The mill will establish a mass balance template for monthly monitoring against dispatched as certified product.</li> </ol>
<b>Assessment Conclusion:</b>	<p>The submitted evidence i.e.</p> <ul style="list-style-type: none"> <li>- mass balance template for monthly monitoring the record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on real-time basis</li> <li>- appointment letter of a person in-charge (Assistant Mill Manager) to monitor and update all the product balance – the letter was signed by the Sr. Mill Manager</li> <li>- Minutes of management review meeting dated 12/3/2018 where the discussion about the record and balance of received FFB and production of CPO and PK had been included</li> </ul> <p>was found to be sufficient to close the NCR. The NCR was effectively closed on 15/4/2018. Continuous implementation shall be verified in the next assessment.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Good commitment from the management team in maintaining the implementation of the RSPO standard requirements.

**3.4.1 Status of Nonconformities Previously Identified and Observations**

Non-Conformity			
NCR Ref #		Clause & Category (Major / Minor)	Major
	1443573-201702-M1		
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/4/2017

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<b>Statement of Nonconformity:</b>	The management did not comply with the Workers’ Minimum Standards of Housing and Amenities Act 1990 and Environmental Quality Act 1974.
<b>Requirement Reference:</b>	Indicator 2.1.1 Evidence of compliance with relevant legal requirements shall be available.
<b>Objective Evidence:</b>	West Oil Mill: i) According to Workers’ Minimum Standards of Housing and Amenities Act 1990, section 23 sub-section (2) “It shall be the duty of the employer to ensure that all buildings used for the housing of workers, nurseries or community halls are visited and inspected weekly by an estate hospital assistant registered under the Estate Hospital Assistants (Registration) Act 1965 [Act 435] or any other responsible person authorized by the employer who shall report to the resident manager if the buildings are not kept clean.....”. However, the mill management was conducted the inspection once every six months in West Oil Mill. ii) Visit to the workshop compound found traces of oil on the workshop floors and diesel area grounds. Failure to comply with the Environmental Quality Act 1974 Regulation 24. Found also oil residue in the workshop area had contaminated the water inside the perimeter of the monsoon drain flowing out of mill compound. Failure to comply with the Environmental Quality Act 1974 Regulation 25 & 27.
<b>Corrections</b>	1) To conduct housing and amenities weekly inspection: i) The inspection work will be carried out by Estate Hospital Assistant by weekly basis. ii) Any major issue will be raised up immediately to resident manager for action taken. 2) Traces of oil at Workshop area: i) Immediately clean up the area and tighten back daily operation related oily matters and Schedule Waste management ii) Construct proper bund to avoid any waste oil flowing into monsoon drain. iii) Dedicated area for vehicle servicing and works related oil matters. The area to equip with suitable spillages kit.
<b>Root Cause Analysis:</b>	1) The responsible person appointed by the Mill management conducted housing inspection on 6 monthly basis and specific for the defect report. The person incharge was not realize that, the inspection shall to carry out on weekly basis as per mention in the act. 2) Lack of awareness and monitoring on handling the waste at workshop. The containment wall insufficient to prevent oil spillage to the monsoon drain and the oil sump was not in properly order.
<b>Corrective Actions:</b>	1) To follow with VMO visit plan. 2) Operation unit will conduct schedule waste management training to the respective PIC as a part of his responsibility to enhance the knowledge and awareness on handling schedule waste and related regulation - EQ (schedule waste) regulation 2005.
<b>Assessment Conclusion:</b>	There is line site inspection conducted on weekly basis by Mohd Nazari (Medical Assistant) to West Oil Mill and West Estate. There is also line site Block C <i>Longkang Clean Up</i> activity on 12.02.18. Housekeeping at the workshop area was found to be good and oil trap was functioning to prevent oil from escaping to the environment. Therefore, this NCR was effectively closed.

Non-Conformity		
<b>NCR Ref #</b>	1443573-201702-M2	<b>Clause &amp; Category</b> Major

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		<b>(Major / Minor)</b>	
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	14/4/2017
<b>Statement of Nonconformity:</b>	The management did not comply with the MAPA/NUPW Circular No. 22/2015.		
<b>Requirement Reference:</b>	Indicator 6.5.1 Documentation of pay and conditions shall be available.		
<b>Objective Evidence:</b>	According to MAPA/NUPW Circular No. 22/2015 dated 4/8/2015, the employer required to fully subsidize RM 3.00 per month for each of the members of NUPW as premium towards NUPW/AIA Personal Accident Group Scheme. However, the West Oil Mill's management has yet to subsidize and deducted RM 11.00 from sampled workers below: a. Employee No.: 120000 b. Employee No.: 7057 c. Employee No.: 119649 d. Employee No.: 96306		
<b>Corrections</b>	Mill management noted on the new regulation on the said subsidies. Mill management identified list of the affected workers and reimbursed (lump sum) the fee in coming salary. (February 2017)		
<b>Root Cause Analysis:</b>	The systems used for tracking any changes in laws and regulations Inefficient at the organization.		
<b>Corrective Actions:</b>	1) Immediately give subsidize RM 3.00 per month for each members of NUPW. To continue on monthly basis until new/update MAPA/NUPW Circular issued. 2) To keep updated and follow the detail on MAPA/NUPW Circular and agreement		
<b>Assessment Conclusion:</b>	Pay slip of months Jun'17, Nov'17 and Jan'18 for workers have been sampled as below and it was found that the NUPW/AIA Personal Accident Group Scheme amounted RM 11.00 has been subsidized with RM 3.00 by the employer in the pay slip. West POM: a) Employee No.: 115951 b) Employee No.: 114901 c) Employee No.: 61701  West Estate: a) Employee No.: 57738 b) Employee No.: 103990 c) Employee No.: 109322 d) Employee No.: 116849  Therefore, no repetitive issue occurred and this NCR was effectively closed.		

<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1443573-201702-M3	<b>Clause &amp; Category (Major / Minor)</b>	Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	14/4/2017
<b>Statement of Nonconformity:</b>	Worker's 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) were not effectively managed.		

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<p><b>Requirement Reference:</b></p>	<p>Indicator 6.5.2 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) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p>
<p><b>Objective Evidence:</b></p>	<p>West Oil Mill and West Estate: The contracts signed by the workers were in old version where the public holiday entitlement was 12 days instead of 13 days and security bond was stated in the contracts. The contracts sampled as below: a. Employee No.: 125178 (WOM) b. Employee No.: 115976 (WOM) c. Employee No.: 124031 (WOM) d. Employee No.: 63557 (WE) e. Employee No.: 76679 (WE) f. Employee No.: 72316 (WE) g. Employee No.: 108272 (WE) h. Employee No.: 99079 (WE) i. Employee No.: 109315 (WE) Extension contracts for sampled workers below were not available in West Estate: a. Employee No.: 97567 b. Employee No.: 72316 c. Employee No.: 96420 d. Employee No.: 76679</p>
<p><b>Corrections</b></p>	<ol style="list-style-type: none"> <li>1) New workers which are employed after July 2016, they signed updated contract that issued by Head Quarters.</li> <li>2) Signed new employment contract.</li> <li>3) The extension employments contract made available.</li> </ol>
<p><b>Root Cause Analysis:</b></p>	<ol style="list-style-type: none"> <li>1) The implementation of the new employment contract is with effect from 1 July 2016 for newly arrived workers where else the yearly contract extension is to be issued to all existing workers who have completed the 3 years of service.</li> <li>2) The extension contract is not retrievable during the audit due to all the document kept at the archive store.</li> </ol>
<p><b>Corrective Actions:</b></p>	<p>To continue latest version for workers contract agreement.</p>
<p><b>Assessment Conclusion:</b></p>	<p>Employment contract are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, holiday and annual leave and termination of services. The contract was signed by the workers and sampled contracts as below: a. Employee No.: 115951 (WOM) b. Employee No.: 114901 (WOM) c. Employee No.: 61701 (WOM) d. Employee No.: 57738 (WE) e. Employee No.: 103990 (WE) f. Employee No.: 109322 (WE) g. Employee No.: 116849 (WE)  Extension contracts were signed by the workers who have worked more than 3 years as below: h. Employee No.: 61701 (WOM) i. Employee No.: 57738 (WE) j. Employee No.: 103990 (WE) k. Employee No.: 109322 (WE)</p>



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	<p>I. Employee No.: 116849 (WE)</p> <p>All employment contracts/extension contracts sampled are having the standard annual leave which is 13 days/year and no security bond was stated in the contracts. Therefore, no repetitive issue occurred and this NCR was effectively closed.</p>
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Non-Conformity			
<b>NCR Ref #</b>	1443573-201702-M4	<b>Clause &amp; Category (Major / Minor)</b>	Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	14/4/2017
<b>Statement of Nonconformity:</b>	CB has not been informed for the projected overproduction of certified tonnage.		
<b>Requirement Reference:</b>	Indicator D4.2 The site shall inform CB immediately if there is a projected overproduction of certified tonnage.		
<b>Objective Evidence:</b>	Overproduction of certified tonnage recorded from Feb 16 - Jan 17, (+70,506.83 mt) vs approved volume 128,296 mt.		
<b>Corrections</b>	1) Mill shall maintain monitoring records of production volume on quarterly basis against the projected volume reported to the Certification Bodies. Mill Manager may at his discretion determine any potential overproduction at any period of the year. 2) Mill to communicate with PSQM to amend the production amount.		
<b>Root Cause Analysis:</b>	Lack of communication between mill and PSQM regarding on the overproduction certified volume.		
<b>Corrective Actions:</b>	PSQM will conduct the SCCS training to the Mill and to ensure the Mill management aware on the SCCS SOP.		
<b>Assessment Conclusion:</b>	There was a projected overproduction of certified tonnage i.e. a total of 26,510 mt of CSPO and 5,273 mt of CSPK. The certification unit has informed the CB and the necessary volume extension was made in the PalmTrace thereafter. Therefore the corrective action was effectively implemented and no recurrence observed.		

Non-Conformity			
<b>NCR Ref #</b>	1443573-201702-M5	<b>Clause &amp; Category (Major / Minor)</b>	Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	14/4/2017
<b>Statement of Nonconformity:</b>	Emergency preparedness was not fully implemented.		
<b>Requirement Reference:</b>	Indicator 4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.		
<b>Objective Evidence:</b>	i) During ASA2_1 site visit at mill, the content of first aid kit was still inadequate as per the Guidelines on First Aid in the Workplace (2nd Edition) by DOSH. Paracetamol was identified as an item in the first aid kit.		

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	ii) Site visit at P 00H, West Estate (CDA sprayer gang), content of first ai kit was found insufficient.  Corrective action was not sufficient. There was a minor nonconformity raised against this indicator during the previous audit (Recertification). Therefore, this nonconformity has been upgraded to Major as per RSPO certification system.
<b>Corrections</b>	1) Immediately to remove the paracetamol in the box. 2) The PIC of the first aid box shall to inform MA if the item insufficient. The MA shall to replace immediately.
<b>Root Cause Analysis:</b>	1) MA has conducted the monthly inspection, however the pic at the mill accidently put the paracetamol into the box. 2) MA has conducted the monthly inspection, however worker use the item not return back the item into the box.
<b>Corrective Actions:</b>	Estate and mill management will do the spot check time to time basis.
<b>Assessment Conclusion:</b>	First aid box inspection was conducted on monthly basis by MA for West POM and West Estate. Last first aid box inspection was done on 12/2/2018. There is no paracetamol in the first aid box and all the inventories in the first aid box found adequate. Thus, the major NC was remain closed.

Non-Conformity			
<b>NCR Ref #</b>	1443573-201702-N1	<b>Clause &amp; Category (Major / Minor)</b>	Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	14/2/2018
<b>Statement of Nonconformity:</b>	Written information on legal requirements was not effectively maintained.		
<b>Requirement Reference:</b>	Indicator 2.1.2 Written information on legal requirements was not effectively maintained.		
<b>Objective Evidence:</b>	West Oil Mill LORR FY 2016/2017 has been prepared, checked and approval for compliance on 19/11/2016. However, the Minimum Wage Order 2012 is still being used.		
<b>Corrections</b>	Update the new LORR and to amend the legal compliance.		
<b>Root Cause Analysis:</b>	The systems used for tracking any changes in laws and regulations Inefficient at the organization.		
<b>Corrective Actions:</b>	The system to track changes in law has been updated with assigned personnel in place.		
<b>Assessment Conclusion:</b>	The Minimum Wage Order 2016 had been included in the latest updated LORR. Based on the verification of LORR, the assigned personnel has satisfactorily delivered his responsibility to track the changes in law. Therefore, this minor NCR was effectively closed.		

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	CATEGORY (MAJOR/ MINOR)	ISSUED	STATUS & DATE (Closure)
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CR01 – 5.3.2	Minor	28/1/2009	Closed out on 8/4/2011
CR02 – 4.4.7	Minor	8/4/2011	Closed out on 21/3/2012
CR03 – 5.3.2	Minor	8/4/2011	Closed out on 21/03/2012
1022246N7 – 5.3.2	Minor	12/2/2014	Upgraded to Major on 6/03/2015
1022246N2- 5.5.3	Minor	12/2/2014	Closed out on 5/03/2015
1022246N3 – 6.5.2	Minor	12/2/2014	Closed out on 5/03/2015
1022246N4 – 6.5.3	Minor	12/2/2014	Closed out on 5/03/2015
1151638M1 - 5.3.2	Major	6/3/2015	Closed out on 20/04/2015
1151638M2 - 2.1.1	Major	6/3/2015	Closed out on 20/04/2015
1304223M1 – 7.1.1	Major	9/3/2016	Closed out on 10/6/16
1304223M2 – 7.3.2	Major	9/3/2016	Closed out on 10/6/16
1304223M3 – 7.81	Major	9/3/2016	Closed out on 10/6/16
1304223N1 – 7.1.2	Minor	9/3/2016	Closed out on 28/2/2017
1304223N2 – 7.8.2	Minor	9/3/2016	Closed out on 28/2/2017
1304223N3 – 4.7.5	Minor	9/3/2016	Upgraded to Major Closed out on 14/4/2017
1443573-201702-M1 – 2.1.1	Major	28/02/2017	Closed out on 14/04/2017
1443573-201702-M2 – 6.5.1	Major	28/02/2017	Closed out on 14/04/2017
1443573-201702-M3 – 6.5.2	Major	28/02/2017	Closed out on 14/04/2017
1443573-201702-M4 – D 4.2	Major	28/02/2017	Closed out on 14/04/2017
1443573-201702-M5 – 4.7.5	Major	28/02/2017	Closed out on 14/04/2017
1443573-201702-N1 – 2.1.2	Minor	28/02/2017	Closed out on 14/2/2018
1590312-201801-M1 – 2.1.1	Major	14/2/2018	Closed out on 15/4/2018
1590312-201801-M2 – SCC 5.3.2	Major	14/2/2018	Closed out on 15/4/2018
1590312-201801-M3 – SCC 5.13.1	Major	14/2/2018	Closed out on 15/4/2018
1590312-201801-M4 – SCC 5.13.2	Major	14/2/2018	Closed out on 15/4/2018
1590312-201801-M5 – SCC 5.13.3	Major	14/2/2018	Closed out on 15/4/2018
1590312-201801-M6 – SCC D.5.1	Major	14/2/2018	Closed out on 15/4/2018

**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 about West Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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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 with 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.

<b>List of Stakeholders Contacted</b>	
<p><b>Internal Stakeholders</b></p> <ul style="list-style-type: none"> <li>• Mill employees – lab assistant, electrical supt., workshop, ETP operators</li> <li>• Estates employees – harvesters, sprayers, transporter, P&amp;D, staff</li> <li>• Smallholders – landowners</li> </ul>	<p><b>Union/Contractors/Local Communities</b></p> <ul style="list-style-type: none"> <li>• SRM LTD Contractor</li> <li>• Sewing service (women association)</li> </ul>
<p><b>Government Departments</b></p> <ul style="list-style-type: none"> <li>•</li> </ul>	<p><b>NGO</b></p> <ul style="list-style-type: none"> <li>•</li> </ul>

**Issues raised by Stakeholders**

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss SOU 9 West 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. These have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each



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of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E.	
IS #	Description
1	<p><b>Issues:</b> <u>AMESU Representative</u> The complaint regarding house repair was not solved immediately by the mill management to one of the mill staff. The complainant has cascaded the report to higher management through e-mail recently.</p> <p><b>Management Responses:</b> There is progress of repairs been done by phases. As todate, the complaint regarding ceiling leakage has been repaired accordingly. Awaiting for the next repair works by the contractor as now is a peak period.</p> <p><b>Audit Team Findings:</b> There is complaint procedure for AMESU members to be followed if the dispute/case is not solved. Seen the AMESU representative didn't follow the steps provided as per Collaborative Agreement which there should be meeting held between Manager and Employee if the complaint made is not solved between 10 days. There was a site visit held at the line site (house no 237/staff quarter) and seen the repair progress been made on the ceiling, installation of mosquito net and road grading to the complainant house. Furthermore, based on the latest AMESU meeting held on 2/2/2017 at West POM, there is no such issue raised as concern.</p>
2	<p><b>Issues:</b> <u>SJK(T) Pulau Carey</u> Request for the assistance on the field grading has been made to the West Estate recently. There is one incident of NGO visitor whom would like to visit the school was prohibited to enter the estate.</p> <p><b>Management Responses:</b> West Estate received the request from school on the field grading and in the process to do it. The auxiliary police has been instructed to make sure that the NGO visitor should obtain the entry approval first at the guard post and it seems that the NGO visitor is not feeling comfortable with the procedure and leave the estate in short time.</p> <p><b>Audit Team Findings:</b> Based on the investigation, there is a miscommunication between school teacher and estate management where school teacher didn't aware on this rules and not communicate directly or in advance with the estate management. School teacher is informed accordingly during the stakeholder's meeting regarding the procedure for NGO visitor to enter estate property.</p>
3	<p><b>Issues:</b> <u>NUPW Representative</u> There is no direct pipe line for water to the worker's line site. Estate put the water tank and workers has to carry the water themselves each time which is inconvenience for them.</p> <p><b>Management Responses:</b> Management noted on this issue and in the midst of install the new direct pipeline to line site area.</p> <p><b>Audit Team Findings:</b> To be verified in the next surveillance visit.</p>
4	<p><b>Issues:</b> <u>Gender Committee</u> In West POM, there is a case of sexual harassment reported in the Gender Committee minutes of meeting dated 20.07.17 where the clinic attendant (West Estate) was sexually harassed through whatsapp by receiving nudity photos and videos from Mill Lab Operator on 31/07/17.</p> <p><b>Management Responses:</b> There was an internal investigation done as per company policy and the said worker (mill operator) was terminated on 28.8.17 by West POM.</p> <p><b>Audit Team Findings:</b></p>

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	<p>Seen the evident of case reported and letter of termination for mill worker. Case was considered closed. Interviewed with the victim also been made at West Estate during the audit.</p>
<b>5</b>	<p><b>Issues</b>  <u>Contractors</u>            So far, payment was made in timely manner and accurate to all the contractors engaged with West POM and West Estate.</p> <p><b>Management Responses</b>            Management will maintain good relationship with the contractors.</p> <p><b>Audit Team Findings</b>            No further issue.</p>

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<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that West Palm Oil Mill Certification Unit has complied with the RSPO P&amp;C MYNI 2014, 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 West Palm Oil Mill Certification Unit is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Valence Shem	<b>Name:</b> HJ MAZLAN BIN ABDULLAH
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> SIME DARBY PLANTATION BERHAD KKS WEST
<b>Title:</b> Lead Auditor	<b>Title:</b> SR. MILL MANAGER
<b>Signature:</b>  	<b>Signature:</b> <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>  
<b>Date: 31/7/2018</b>	<b>Date: 31/7/2018</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>PRINCIPLE 1: COMMITMENT TO TRANSPARENCY</b>			
<p><b>Criterion 1.1:</b> Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
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. - 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. Seen the records such as request from Universiti Malaya on 21.07.17, internal request as per SEMUA Mill Application-ID Maintenance Form on 21.9.16 and Order Form: Business Card for Mill Assistant.</p> <p>In West Estate, there are suggestion box book to keep record for the internal and external request and West Estate Audit Dosh logbook.</p>	Complied
1.1.2	<p>Records of requests for information and responses shall be maintained. - Major compliance -</p>	<p>The requests were normally from internal stakeholders related to the house repairing work. In West POM, seen the Repairs &amp; Jobs Requisition – Bungalow &amp; Linesite Besides form, the stakeholders will write in formal letter if they are requested for some assistance from the operating units. Most of the requests were fulfilled by the operating units. In West Estate, there is the records from stakeholders regarding various issues such as wild dogs, cattle &amp; goats and stakeholders meeting maintained.</p>	Complied
<p><b>Criterion 1.2:</b> Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>			
1.2.1	<p>Publicly available documents shall include, but are not necessarily limited to:</p> <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> </ul>	<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.</p> <p>SDPSB 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</p>	Complied



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Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> <li>HCV documentation (Criteria 5.2 and 7.3);</li> <li>Pollution prevention and reduction plans (Criterion 5.6);</li> <li>Details of complaints and grievances (Criterion 6.3);</li> <li>Negotiation procedures (Criterion 6.4);</li> <li>Continual improvement plans (Criterion 8.1);</li> <li>Public summary of certification assessment report;</li> <li>Human Rights Policy (Criterion 6.13).</li> </ul> <p>- Major compliance -</p>	<p>through SDPSB's website at <a href="http://www.simedarbyplantation.com/Sustainability.aspx">http://www.simedarbyplantation.com/Sustainability.aspx</a></p> <ul style="list-style-type: none"> <li>Among the documents that were made available for viewing are:</li> <li>Good Agricultural Practices</li> <li>Social Enhancement</li> <li>Sustainability Management Programmes</li> <li>Complaint and Grievances procedure.</li> <li>Environmental Conservation</li> </ul> <p>Besides, policies for SDPSB were published at the same website:</p> <ul style="list-style-type: none"> <li>Social</li> <li>Quality</li> <li>Food Safety</li> <li>Occupational Safety &amp; Health</li> <li>Environment &amp; Biodiversity</li> <li>Slope Protection and Buffer Zone</li> <li>Lean Six Sigma</li> <li>Gender</li> </ul> <p>The policies were also displayed at various strategic locations including the main notice boards of the estates, mill office, clinic, muster ground notice boards for employees and visitors to view.</p>	
<p><b>Criterion 1.3:</b> Growers and millers commit to ethical conduct in all business operations and transactions.</p>			
1.3.1	<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 has established policy on code of ethical conduct and integrity (Code of Business Conduct- COBC) which covers all operations in the plantation operation. Policy displayed on the notice board and communicated to employees.</p> <p>Briefing of policies were given to the workers during the latest Safety Briefing on 07.10.17 about MSPO &amp; RSPO Policy in West POM. In West Estate, the COBC Training was conducted on 10.02.2017 at Muster Ground West Division.</p>	Complied
<p><b>PRINCIPLE 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS</b></p>			
<p><b>Criterion 2.1</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p>Evidence of compliance with relevant legal requirements shall be available.</p> <p>- Major compliance -</p>	<p>SOU9 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. SOU9 had obtained and renewed license and permits as required by</p>	No

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Criterion / Indicator	Assessment Findings	Compliance
	<p>the law. Sample of licenses or permit viewed were:                      WPOM:</p> <ol style="list-style-type: none"> <li>1. MPOB license: 533238004000 (validity period 01/10/2017 – 30/09/2018) for 240,000MT.</li> <li>2. DOE License: 003180 (validity period 01/07/2017 - 30/06/2018).</li> <li>3. Energy commission license no: 004520/2017; for 3062.75 kW installation capacity. Valid till 19/6/2018 ( PJ-T-2-B-0148-2002, and PJ-T-2-B-0320-2012 grade A1)</li> <li>4. Steam Boiler and Steam Engine Driver (SL/13/ELS/02/1-2<sup>nd</sup> Grade)</li> <li>5. Steam Boiler and Steam Engine Driver (SL/5/2000-1<sup>st</sup> Grade)</li> <li>6. Authorized Entrant &amp; Standby Person for Confined Space, NW-HQ-AE-3883-P (valid till 11/7/2019).</li> <li>7. Authorized Gas Tester, NW-HQ-AGT-1000- (valid till 26/6/2018)</li> <li>8. Competent Person for CePPOME (Certified Environmental Professional in the Treatment of Palm Oil Mill Effluent – Pond Processes) – Mazlan Bin Abdullah (600410-11-5089)</li> <li>9. Competent Person for CePSWaM (Certified Professional in Scheduled Waste Management) –Mazlan Bin Abdullah (600410-11-5089)</li> <li>10. Certificate of Fitness for Unfired Pressure Vessels/Steam Boiler/lifting equipment:                         <ol style="list-style-type: none"> <li>i. PMT 133921 (valid till 06/03/2017),</li> <li>ii. PMD17422 (valid until 12/7/2016),</li> <li>iii. PMT42233 (valid until 6/3/2017)</li> <li>iv. PMT 24511 (valid until 6/3/2017)</li> <li>v. PMA 18716 (valid until 6/3/2017)</li> <li>vi. PMA5143 (valid until 6/3/2017)</li> </ol> </li> </ol> <p>Most of the certificates were expired. The management has made a payment on 20/6/2017 for the inspection of all machineries done on 7/3/2017 by DOSH officer, however pending certificate with DOSH department. The communication letter dated 3/11/2017 was sighted.</p> <p>WE:</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>1. Certificate of Fitness for Unfired Pressure Vessels, PMT37321 and PMT24817 (valid until 9/1/2018). However, the equipment was not in use (waiting for inspection by DOSH officer).</p> <p>2. Diesel permit # B025312, license holder: Sime Darby Plantation Sdn Bhd, validity 24/2/2017 to 23/2/2018, 20,000 lt diesel &amp; 10,000 lt petrol</p> <p>However, in West Estate, sampled worker's pay slips showed that working on Sunday for worker ID (India): 103990 is not having the double paid which is incompliance with Malaysia Employment Act 1955. As per EMPLOYMENT ACT 1955, Work on rest day: 60. (d) In the case of an employee employed on piece rates who works on a rest day, he shall be paid twice his ordinary rate per piece. The sampled pay slips are as below:                      - Estate worker ID (India): 103990, pay slip for June 2017.</p> <p>Therefore, the Major NC is raised under this requirement.</p>	
2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained.                      - Minor compliance –</p>	<p>The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that are applicable to the CU operation. Each office of the operating unit (mill and estates) has its own LORR and were being evaluated individually annually for compliance. Among the applicable legal laws registered are EQA, OSHA, Factory &amp; Machinery Act, Labour Act, Pesticides Act, Workers' Minimum Standard of Housing and Amenities Act, to name a few. The Minimum Wage Order 2016 had also been included in the latest updated LORR and therefore addressed the minor NCR raised in previous assessment.</p>	Complied
2.1.3	<p>A mechanism for ensuring compliance shall be implemented.                      - Minor compliance –</p>	<p>The applicable legal requirements registered in the LORR. Periodically, the CU assigned its personnel to cross check the status of compliance against the LORR through various ways such as internal audit and routine inspections. Whenever there is non-compliance detected, appropriate actions will be taken to address the issue.</p>	Complied

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2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance –	A special department (PSQM) which is based in Kuala Lumpur was responsible in tracking the changes to the Acts and Regulations in their legal register by communicating with the publisher of the documents. This mechanism was outlined in its procedure. The revision of the legal register was done from time to time and should there be any update, it would be communicated to the respective CUs. As to-date no change to the CU activities and no new legal requirements associated to their operation.	Complied
<b>Criterion 2.2</b>			
The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	West Mill and Estate operation is on freehold land and no restriction on the land use right. Copy of land titles were available for verification. A total of 4 land titles (# 46219, 46220, 44294 and 47697) to demonstrate the right to use the land.. The land title 47697 was shared with East estate.	Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance –	The Estate has maps showing the locations of boundary stones that have been physically located and marked. Inspection of a sample of boundary stones at West Estate, during the field inspection confirmed that they were clearly marked and maintained.	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 the West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	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. - Minor compliance –	There is no land dispute in the West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	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	There is no land dispute in the West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied

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	neighbouring communities where applicable). - Minor compliance –		
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 the West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
<b>Criterion 2.3</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance –	There is no land dispute in the West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities’ decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted	There is no land dispute in the West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied

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Criterion / Indicator		Assessment Findings	Compliance														
	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 –																
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 West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	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 West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied														
<b>PRINCIPLE 3: COMMITMENT TO LONG-TERM ECONOMIC AND FINANCIAL VIABILITY</b>																	
<b>Criterion 3.1</b>																	
There is an implemented management plan that aims to achieve long-term economic and financial viability.																	
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 production CPO, OER, and KER, utilisation rate and CAPEX. Sample for WPOM: new weighbridge, new de-oiling tank and new steriliser liner. 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 –	West Estate has prepared the replanting programme with minimum of 5 years projection. Below is the details of the programme: <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Year</th> <th>Ha to be replanted</th> </tr> </thead> <tbody> <tr> <td>FY17/18</td> <td>254.22</td> </tr> <tr> <td>FY18/19</td> <td>240.38</td> </tr> <tr> <td>FY19/20</td> <td>167.84</td> </tr> <tr> <td>FY20/21</td> <td>128.01</td> </tr> <tr> <td>FY21/22</td> <td>107.53</td> </tr> <tr> <td>FY22/23</td> <td>232.31</td> </tr> </tbody> </table>	Year	Ha to be replanted	FY17/18	254.22	FY18/19	240.38	FY19/20	167.84	FY20/21	128.01	FY21/22	107.53	FY22/23	232.31	Complied
Year	Ha to be replanted																
FY17/18	254.22																
FY18/19	240.38																
FY19/20	167.84																
FY20/21	128.01																
FY21/22	107.53																
FY22/23	232.31																

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Criterion / Indicator	Assessment Findings	Compliance	
<b>PRINCIPLE 4: USE OF APPROPRIATE BEST PRACTICES BY GROWERS AND MILLERS</b>			
<b>Criterion 4.1</b>			
Operating procedures are appropriately documented, consistently implemented and monitored.			
4.1.1	<p>Standard Operating Procedures (SOPs) for estates and mills shall be documented.</p> <ul style="list-style-type: none"> <li>- Major compliance -</li> </ul>	<p>SOU9 has continued to use the documented SOPs for Palm Oil Mill and the Estates. Among the SOPs available were:</p> <ol style="list-style-type: none"> <li>1. Mill Quality Management System (MQMS/SOP/08 v.1 dated 1/11/2008)</li> <li>2. Sustainable Plantation Management System v.1 2008 dated 1/4/2008 (pictorial safety standard) as a guidance document to operate the mill. E.g.: WTP, Store, Boiler and PTW.</li> <li>3. Agricultural Reference Manual - Oil Palm Planting</li> <li>4. Estate Quality Management System</li> </ol>	Complied
4.1.2	<p>A mechanism to check consistent implementation of procedures shall be in place.</p> <ul style="list-style-type: none"> <li>- Minor compliance –</li> </ul>	<p>External Mill Advisor inspect and report on the operations on annual basis. There were other audits by PSQM to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.</p> <p>Structured Oil Recovery Assessment (12-15/12/2017) at WPOM, scoring= 74%</p> <p>Mill Advisory Report (SOU9/WTM/01/1718) was done on 7-8/8/2017 at WPOM</p> <p>At the estate, some mechanisms to ensure consistent implementation sighted:</p> <ul style="list-style-type: none"> <li>• Performance Monitoring Visit by PMU (Performance Monitoring Unit), frequency is quarterly covering replanting, mature upkeep, manuring, building &amp; facilities management, EVIT and ex-estate cost. Last visit December 2017 – in general the results were good.</li> <li>• Estate structure crop recovery assessment report by PSQM, frequency quarterly, covering harvesting standard and field maintenance. Last visit Dec 2017 – result 3+ (i.e. 91%-914%)</li> </ul>	Complied
4.1.3	<p>Records of monitoring and any actions taken shall be maintained and available, as appropriate.</p> <ul style="list-style-type: none"> <li>- Minor compliance –</li> </ul>	<p>Records of monitoring were available at mill and estate office. All the action was established through the recommendation by managers.</p>	Complied
4.1.4	<p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).</p>	<p>West POM does not accept crop from any third parties.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
- Major compliance -			
<b>Criterion 4.2:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
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 –	ARM Section 8 covers the procedure for fertiliser application for both immature and mature. The procedure gives the guideline type of fertilisers to be used, timing to apply, dosage and placement.	Complied
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 West POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/Ha.	Complied
<b>Criterion 4.3</b> Practices minimise and control erosion and degradation of soils.			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Based on the soil map, there are no peat soil or soil categorised as problematic or fragile at West Estate. The estate's soils are mostly Selangor, Bungor and Jawa series based on the report by Param Agricultural Soil Surveys (M) Sdn Bhd dated November 2011.	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 –	Landscapes of visited estate are mostly flat and undulating, 0-4% land (Param Agricultural Soil Surveys (M) Sdn Bhd dated November 2011). However, Sime Darby has a policy on slope planting and this will be implemented during replanting.	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	Complied



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Criterion / Indicator		Assessment Findings	Compliance																		
		roadside pruning, grading and resurfacing. Based on expenditure report, the progress to-date is in-line with the programme.																			
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Major compliance –	There are no peat soil or soil categorised as problematic or fragile soil at West Estate.	Complied																		
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the longterm viability of the necessary drainage for oil palm growing. - Minor compliance –	There are no peat soil or soil categorised as problematic or fragile soil at West Estate.	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 –	There are no peat soil or soil categorised as problematic or fragile soil at West Estate.	Complied																		
<b>Criterion 4.4</b>																					
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 –	The mill water management plan was last reviewed on 13/11/2017. The plan has includes water quality monitoring, rain water collection, reducing water usage and dry cleaning at mill. Water quality monitoring was done monthly basis, last was carry out on 4/1/2018 (IE79/2018).	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="715 1570 1353 1771"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> <th></th> </tr> </thead> <tbody> <tr> <td>&gt; 40 meters</td> <td>50 meters</td> <td></td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> <td></td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> <td></td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> <td></td> </tr> <tr> <td>&lt; 5 meters</td> <td>5 meters</td> <td></td> </tr> </tbody> </table> Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/rivers, version 1, year 2008, issue no. 1, dated 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
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4.4.3	Appropriate treatment of mill effluent to required levels and	The treated POME is discharge to West Estate for land application. The DOE license stated	Complied																		

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Criterion / Indicator		Assessment Findings	Compliance
	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 –	that the BOD level discharged shall be below 5,000mg/l. The POME treatment sample record has been verified to confirm the BOD is below 5,000ppm. Records reviewed: a. Date sample: 2/11/2017, BOD result: 2510 mg/l , analysis report: EP653/2017 b. Date sample: 3/10/2017, BOD result: 2965 mg/l, analysis report: EP597/2017 c. Date sample: 2/8/2017, BOD result: 1705 mg/l, analysis report: EP477/2017  DOE 4 <sup>th</sup> quarter report was submitted on 5/1/2018. All the parameters were found within limit.	
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance –	The water usage for mill is monitored on monthly basis. The average water ratio to FFB from Jul 17 till Jan 18 2017 is 0.85ltr/FFB process.	Complied
<b>Criterion 4.5</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.			
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	IPM is documented in Agriculture Reference Manual. The estate continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest population through regular census. Although there have been no outbreak of leaf-eating pests, beneficial plants such as Antigonon leptopus and Tunera sp. were found to be planted along the roadside to host natural predators.	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
<b>Criterion 4.6</b> Pesticides are used in ways that do not endanger health or the environment.			
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease.	Complied

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Criterion / Indicator		Assessment Findings	Compliance																						
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate.  West Estate 2017 <table border="1"> <thead> <tr> <th>Chemical Name</th> <th>Active Ingredient (a.i)</th> <th></th> </tr> </thead> <tbody> <tr> <td>Kenlon</td> <td>Triclopyr methyl 32%</td> <td></td> </tr> <tr> <td>Canyon</td> <td>Metsulforon methyl 20%</td> <td></td> </tr> <tr> <td>Alion</td> <td>Indaziflam 45.50%</td> <td></td> </tr> <tr> <td>Warfarin</td> <td>Warfarin 0.05%</td> <td></td> </tr> <tr> <td>sodium chloride</td> <td>Sodium chloride 99%</td> <td></td> </tr> </tbody> </table> The record of pesticides used was sighted. <table border="1"> <tbody> <tr> <td></td> <td>Jan 18</td> </tr> <tr> <td>West Estate</td> <td>4.45 % a.i/ha</td> </tr> </tbody> </table> Ai/Ha high due to spot spray.	Chemical Name	Active Ingredient (a.i)		Kenlon	Triclopyr methyl 32%		Canyon	Metsulforon methyl 20%		Alion	Indaziflam 45.50%		Warfarin	Warfarin 0.05%		sodium chloride	Sodium chloride 99%			Jan 18	West Estate	4.45 % a.i/ha	Complied
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4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5	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 –	Paraquat was eliminated. At the time of assessment there was no class 1a or 1b pesticide. Alternatives such as Glyphosate were used with the elimination of Paraquat. For trunk injector, Acephate (class III) chemical was used as alternative for methamidophos.	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	Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers.	Complied																						

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Criterion / Indicator		Assessment Findings	Compliance
	products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	#cross refer with indicator 4.8.2	
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.	Complied
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 spraying at West estate.	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 –	There is no associated smallholder at SOU9 Certification Unit. Employees handling pesticide given knowledge and skill required to cover safe handling practices and standard operating procedures.  #cross refer with indicator 4.8.2	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 –	The management disposed the empty containers as per scheduled waste regulations. Refer to indicator 5.3.	Complied
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	Annual medical surveillance for sprayers and pesticide operators were demonstrated.  Medical examination programme established for sprayers which conducted by Klinik Hartati (HQ/08/DOC/00/709). All the pesticides operator was found fit to work. Eg:	Complied

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Criterion / Indicator		Assessment Findings				Compliance	
		ID No	Date of Medical check up	Result	Estate		
		K1209231	3/8/17	Fit	West Estate		
		M1992944		Fit			
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance –	There are female pesticide operators at West Estate only. However, based on interview with female workers confirmed knowledge of the policy of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding.				Complied	
<b>Criterion 4.7</b>							
An occupational health and safety plan is documented, effectively communicated and implemented.							
4.7.1	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>SOU 09 estates and mill has maintained an approved Health and Safety Policy dated January 2015 by Sime Darby Plantations Sdn Bhd, Managing Director 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. Environment safety and health (ESH) management plan for each operating unit had been established. The latest ESH plan was made available during this assessment.</p> <p><u>West POM</u> CHRA: The assessment was last conducted on 14/5/2015 by Env &amp; IH Services (JKKP/HIE/127/171-2(166)). Sighted the CHRA report (SLK1710) dated 29/7/2015.</p> <p>Audiometric Testing: The last audiometric was done on 14 and 21 January 2017 by Alam Hijau Integrasi for total of 115 employees by OHD (HQ/08/DOC/00/491). From the report, there were 10 employees found with hearing impairment.</p> <p>Baseline Examination and Testing of Local Exhaust Ventilation was carried out by Alam Hijau Integrasi (JKKP HIE 127/171-3/2(60))) on 7/3/2017 and found that the company had complied with the USECHH 2000 Regulations.</p>				Complied	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>The Chemical Exposure Monitoring including personal monitoring was carried out by Alam Hijau Integrasi (HQ/12/JHI/00/181, JKPP HIE 127/171-3/1(181)) on 30/5/2017 for 5 personnel. The report (ALM/CHEMICAL/WM/0517/3176) was sighted and found that the concentration of Inhalable Dust and n-Hexane does not exceed the PEL as specified under USECHH Regulation 2000.</p> <p><u>West Estate</u> CHRA: The assessment was last conducted on 13/7/2015 by NIOSH (JKPP HIE/127/171-2(353)). Sighted the CHRA report (03-04/02/CHRA/2015/3) dated 23/11/2015.</p>	
4.7.2	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>- Major compliance -</p>	<p>The risk of all operations were assessed and documented under HIRARC. The HIRARC for the mill operations was last reviewed on 28/07/2017 (WPOM) and 27/10/2017 (WE)</p> <p>HIRARC for the following stations/activities were sighted; Clarification, Effluent treatment, capstan, ramp, laboratory, harvesting, replanting, spraying and trunk injection.</p>	Complied
4.7.3	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Major compliance -</p>	<p>Observed at engine room, oil room, boiler station, trunk injection activity and harvesting activity, adequate and appropriate protective equipment was provided. The PPE was effectively implemented (eg: using safety helmet and nitrile glove).</p> <p>The training was conducted accordingly at mill and estates. Cross refer to indicator 4.8.1</p>	Complied
4.7.4	<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.</p> <p>- Major compliance -</p>	<p>The responsible persons are the Manager and Assistant Manager of the respective operating units. JKPP meeting members consist of employer &amp; employee representatives. Records of regular meetings between the responsible person and workers were maintained. There was no major issue. Refer OHS meeting minutes :</p> <p>1. OHS meeting at WPOM – #1: dated 19/1/2018, #4: dated 14/10/17, #3: dated 15/7/17. All the agenda was</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance						
		<p>discussed accordingly during OHS meeting, eg: accident review, workplace inspection, SIME card report and others has been discussed and action to be taken.</p> <p>2. OHS meeting at WE – #4: dated 23/12/2017, #3: dated 9/10/17, #3: dated 23/6/17. All the agenda was discussed accordingly during OHS meeting, eg: accident review, workplace inspection, training, safety campaign and others has been discussed and action to be taken.</p>							
4.7.5	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance –</p>	<p>Accident and emergency procedures have been communicated to employees, contractors and visitors.</p> <p>1. WPOM - Fire evacuation drill was last conducted on 18/11/2017 to test the state of readiness during emergency situation.</p> <p>2. WE - Fire evacuation drill was last conducted on 9/2/2017 to test the state of readiness during emergency situation.</p> <p>1 accident reported at West POM. JKPP 8 was sent to DOSH on 11/01/2018. 42 accidents reported at West Estate. JKPP 8 was sent to DOSH on 18/01/2018.</p> <p>First aid equipment available at worksites. First aiders competency certificate available e.g. 791019-10-5587, 590427-10-5585,</p> <table border="1"> <thead> <tr> <th>Estate/Mil</th> <th>First Aid Box Station (Site Visit)</th> </tr> </thead> <tbody> <tr> <td>WPOM</td> <td>Process room, Office</td> </tr> <tr> <td>WE</td> <td>Trunk injection (P05A), Harvesting (P06A), workshop</td> </tr> </tbody> </table> <p>First aid box inspection was conducted on monthly basis by MA. Last first aid box inspection was done on 12/2/2018.</p>	Estate/Mil	First Aid Box Station (Site Visit)	WPOM	Process room, Office	WE	Trunk injection (P05A), Harvesting (P06A), workshop	Complied
Estate/Mil	First Aid Box Station (Site Visit)								
WPOM	Process room, Office								
WE	Trunk injection (P05A), Harvesting (P06A), workshop								
4.7.6	<p>All workers shall be provided with medical care, and covered by accident insurance.</p> <p>- Minor compliance –</p>	<p>Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances. Malaysian workers are covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Refer to form 8A,</p>	Complied						

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Criterion / Indicator		Assessment Findings	Compliance														
		<p>"Jadual Caruman" for December 2017 and January 2018.</p> <p>Foreign workers are covered by Foreign Workers Compensation Scheme Certificate of Insurance. Sample insurance policies checked:</p> <table border="1"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Mill/ Estate</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>MW200163</td> <td>29/1/18-28/1/19</td> <td>WPOM</td> <td>B2916937, M8627322</td> </tr> <tr> <td>MG109384</td> <td>23/4/17-22/10/18</td> <td>WE</td> <td>M8625284, AT501419, B2714356, AT501417</td> </tr> </tbody> </table>	Insurance	Period	Mill/ Estate	Remark	MW200163	29/1/18-28/1/19	WPOM	B2916937, M8627322	MG109384	23/4/17-22/10/18	WE	M8625284, AT501419, B2714356, AT501417			
Insurance	Period	Mill/ Estate	Remark														
MW200163	29/1/18-28/1/19	WPOM	B2916937, M8627322														
MG109384	23/4/17-22/10/18	WE	M8625284, AT501419, B2714356, AT501417														
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. - Minor compliance –	<p>Records of incident and accident were available, using internal reporting system. Records on Lost Time Accident (LTA) metrics had been verified to be satisfactory.</p> <p>Sample of accident statistic as shown below:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>WPOM</th> <th>WE</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>30</td> <td>324</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days</p>	Year	WPOM	WE	2017	30	324	Complied								
Year	WPOM	WE															
2017	30	324															
<p><b>Criterion 4.8</b> All staff, workers, smallholders and contract workers are appropriately trained.</p>																	
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance –	<p>A formal training programme on all aspects of RSPO Principles and Criteria has been established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs had been reviewed and found to be complied.</p> <p>Training programme planned for year 2017 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to workers exposed to machinery and high noise levels, workers working in confined space, harvesters, pesticides operators and manurers.</p>	Complied														
4.8.2	Records of training for each employee shall be maintained. - Minor compliance –	<p>The records of training were available at mill and estate office. Sample training checked:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>26/7/17</td> <td>POME</td> <td rowspan="5">WPOM</td> </tr> <tr> <td>26/7/17</td> <td>Crop Quality</td> </tr> <tr> <td>6/4/17</td> <td>Oil Recovery Assessment</td> </tr> <tr> <td>16/6/17</td> <td>Oil Room</td> </tr> <tr> <td>28/7/17</td> <td>HIRARC</td> </tr> </tbody> </table>	Date	Training	Remark	26/7/17	POME	WPOM	26/7/17	Crop Quality	6/4/17	Oil Recovery Assessment	16/6/17	Oil Room	28/7/17	HIRARC	Complied
Date	Training	Remark															
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16/6/17	Oil Room																
28/7/17	HIRARC																



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Criterion / Indicator		Assessment Findings		Compliance	
		24/2/17	First aid		
		23/9/16	S/waste, MSDS		
		25/2/17	LOTO system		
		27/3/17	SWP for operation		
		22/7/17	HIRARC	West Estate	
		6/1/17	Driving Technique		
		20/2/17	Manuring		
		3/3/17	Spraying		
		10/8/17	Trunk Injection		
<b>PRINCIPLE 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY</b>					
<b>Criterion 5.1</b> 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.					
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	SOU9 Plans and impact assessments relating to environmental impacts based on documents as following: <ul style="list-style-type: none"> <li>Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register</li> <li>Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI</li> <li>Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE.</li> </ul>			Complied
5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance –	There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered. 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-incharge 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.			Complied

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<p>5.1.3</p>	<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><u>WPOM</u> Monitoring plan was established based on DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling. Based on Sustainable Plantation Management System Appendix 10 Procedure for Mill Environmental Performance version 1, year 2008, issue no. 1, dated 1 October 2008. Uses the Mill Environmental Performance Review (Form A) Mill environmental monitoring records available/sighted:</p> <p>The POME treatment sample record has been verified to confirm the BOD is below 5,000ppm. Records reviewed:</p> <ol style="list-style-type: none"> <li>1. Date sample: 2/11/2017, BOD result: 2510 mg/l , analysis report: EP653/2017</li> <li>2. Date sample: 3/10/2017, BOD result: 2965 mg/l, analysis report: EP597/2017</li> <li>3. Date sample: 2/8/2017, BOD result: 1705 mg/l, analysis report: EP477/2017</li> </ol> <p>DOE 4<sup>th</sup> quarter report was submitted on 5/1/2018. All the parameters were found within limit.</p> <p>Stack sampling for 2 boiler chimney was done twice a year. 1<sup>st</sup> stack sampling was done on 8 &amp; 24/3/2017 (ALM/WESTOIL/0317/3023) and 2<sup>nd</sup> stack sampling was done on 11/10/2017 (ALM/WESTOIL/1017/3514). The result for 2 stack sampling report shown that the measured levels of gaseous emission emitted and stack leading from 2 boiler chimney monitored were found to be within the limit. The assessment was done by Alam Hijau Integrasi (M) Sdn Bhd.</p> <p>Online scheduled waste inventory &amp; consignment was updated as at 30/01/2018 where the quantity and storage period were within allowable limit. The last disposal was done on 25/10/2017 for SW322 (0.755mt), SW409 (0.225mt), SW410 (0.095mt) and SW305 (0.3 mt) by Kualiti Alam Sdn Bhd.</p> <p><u>WE</u> The plan incorporate a monitoring updates at West Estate where updated status of each plan was monitored accordance to the time frame allocated. Updating of the progress of plan is carried out by the assistant managers</p>	<p>Complied</p>

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		and the results of the monitoring effectiveness are reviewed in the management units operating meetings. Mitigation measures were included in the environmental management plan.	
<p><b>Criterion 5.2</b></p> <p>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 re-assessment has been conducted on the Feb 2015 by Sustainability Department (Social &amp; Environment Projects Unit) which involved the representatives from local government agencies, local communities, service providers, and neighbouring estates. In addition to the revisited HCV assessment, additional HCV assessment was carried out for the new planting plot in 2016 on 27-28 April 2016 by PSQM team. Among the areas considered as HCV are as follows:</p> <ul style="list-style-type: none"> <li>- Natural pond (HCV 4): 4.79 ha</li> <li>- Fringe mangrove (HCV 4): 39.84 ha</li> <li>- Hatters castle (HCV 6): 1.12 ha</li> <li>- Total HCV areas: 45.75 ha</li> </ul> <p>Conservation set-aside (CSA) was also identified within west estate. Agro-forestry, arboretum (herb) was classified as CSA with the total of 111.25 ha. This area was also categorised as HCV by the management.</p> <p>The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. Map verification and site visit confirmed that west estate is surrounded by river/straits and villages. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.</p>	Complied
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are	Wildlife found in plantation identified in the HCV report dated February 2015. Common wildlife which classified under IUCN conservation status and WCA 2010 (Act 716) was identified, i.e. for birds (white-throated	Complied

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	<p>expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>kingfisher - least concern (IUCN)/totally protected wildlife), mammals (wild boar - least concern(IUCN)/ protected wildlife), reptiles (king cobra – vulnerable (IUCN)/protected wildlife).</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. Records of patrolling and animal sighting were maintained and updated.</p> <p>Mechanism for reporting the sightings of various types of wildlife was implemented accordingly. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Signage that prohibit hunting, fishing and water polluting activities were verified on-site and found to have been well maintained.</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>The program to regularly educate the workforce and community about the status of RTE species has been established with on-going consultation with the relevant authorities at the Kuala Langat District. There was evidence of commitment to discourage any illegal or inappropriate hunting, fishing or collecting activities through the signage put up around the affected areas to prevent such activities. Interview with the staff and workers revealed that they were aware about the restriction of hunting and RTE species identified in the estate.</p>	Complied
5.2.4	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the management plan.</li> </ul> <p>- Minor compliance –</p>	<p>The biodiversity action plan has been established and updated on yearly basis. Refer to the latest HCV management plan FY2017/2018. The HCV and Biodiversity around the estate were monitored and maintained by Sime Darby Research and Development located in the same vicinity of the estate. Visit to the Biodiversity area along the Malacca Straits found the area is being well maintained with the planting of trees. Enhancement of the river buffer zones are also being carried out. Habitat protection includes prevention of disturbance by workers through awareness campaigns and regular patrols of the area. West estate is surrounded</p>	Complied

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		with 40 km of earth bund and regular patrolling was carried to inspect condition of bund at the monitoring points and the potential of leaks and bund break within the area.	
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
<b>Criterion 5.3</b>			
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. Mill: type of waste – effluent, fibre/shell, EFB, boiler clinker, wash water, scrap metal, scheduled waste, boiler blowdown, hydro-cyclone wash water, methane gas. Estate: Type of wastes – domestic, empty chemical containers, fertiliser bags, scheduled wastes and recyclable wastes (plastic, paper and glass) 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
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	The used chemicals and containers were disposed in accordance with Scheduled Waste regulations. Stores for scheduled waste were inspected at audited sites in mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. The last disposal sampled at mill was done on 25/10/2017 for SW322 (0.755mt), SW409 (0.225mt), SW410 (0.095mt) and SW305 (0.3 mt) by Kualiti Alam Sdn Bhd.	Complied

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5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance –	Scheduled waste is managed well with designated storage area at the mill and each of the estates not to less than 180 days in accordance with the requirements of the Environmental Quality Act 1974 (Scheduled Wastes), Regulations, 2005. Disposal was through licensed collector. The company has continued managing scheduled waste stores at the mill and each of the estates. Agrochemical containers are triple rinsed and punctured to avoid any misuse. Sampled Environmental Improvement Plan/Pollution Prevention Plan KKS West SOU9 dated 24/11/2016 including control of black smoke, effluent, POME, oil spillage domestic, waste water and scheduled waste sighted during the visit as well as for estates.	Complied
<b>Criterion 5.4</b> 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 –	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. Palm fibre and shells were also used to generate electricity through steam turbine and boiler. 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 boiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis respectively.  Monthly records of energy consumption of non-renewable and renewable fuel per metric tonne of palm product at the Mill were available. For December 2017, the record of diesel consumption was 0.20 ltr/mt FFB.	Complied
<b>Criterion 5.5</b> Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the	The Group policy of “Zero open burning” is enforced since July 2008. The operating units	Complied

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	'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	adhere to the policy of "Zero open burning" for any replanting, if any, in the estates. Field inspections made in West Estate showed no evidence of open burning.	
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 the estate.	Complied
<b>Criterion 5.6</b>			
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 -	As prescribed under "Jadual Pematuhan , license# 003180, air emission from boiler stack have to be monitored twice per year. 1 <sup>st</sup> stack sampling was done on 8 & 24/3/2017 (ALM/WESTOIL/0317/3023) and 2 <sup>nd</sup> stack sampling was done on 11/10/2017 (ALM/WESTOIL/1017/3514). The result for 2 stack sampling report shown that the measured levels of gaseous emission emitted and stack leading from 2 boiler chimney monitored were found to be within the limit. The assessment was done by Alam Hijau Integrasi (M) Sdn Bhd.	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance -	The GHG emissions due to the operations is identified and recorded in the palm GHG version 3.01. The management has started operation of Biogas Plant at WPOM. The biogas plant starts commissioning in June 2017.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	The GHG emissions due to the operations is identified and recorded in the palm GHG version 3.01. These GHG calculations were done as per certification unit basics. Summary emissions: a. Emission/ mt CPO= 1.28 tCO2 e/mt CPO b. Emission/ mt PK= 1.28 tCO2 e/mt PK The period of the report was from Jan 16 – Dec 16. The report was communicated to the RSPO accordingly on 22 Jan 2017.	Complied
<b>PRINCIPLE 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES AFFECTED BY GROWERS AND MILLERS</b>			

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<p><b>Criterion 6.1</b> Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>			
<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 (SIA) was conducted on 27- 28/3/2014 by Social &amp; Environment Projects Unit, PSQM Department. The methodologies of the assessment were interview with the workers and external stakeholders such as local communities, site observations and documentation review. Attendant list of the interviewed stakeholder was sighted in the report.</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>The assessment was conducted with the participation of relevant stakeholders such as neighbouring villagers, government authority, contractors and suppliers and internal workers. Attendance list of the stakeholders was sighted.</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>The mill and estate's management have developed an action plan for social assessment based on the issues raised during SIA. The plan has incorporated timetable with responsibilities for mitigation and monitoring of the social impacts were developed and reviewed as necessary.</p>	<p>Complied</p>
<p>6.1.4</p>	<p>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 -</p>	<p>The plan was reviewed on yearly basis and last reviewed was conducted on 02/02/2018 in mill and on July 2017 – Jun 2018 (SOU 9 FY 2017/2018) in estate. Among the request for West POM are: - Workers Request – To build playground at linesite and to brief on entitlements e.g. insurance coverage, salary and allowance. - Pay Slip – To display enlarged pay slip at Muster Ground in Bahasa. In West Estate, the issues are: - NUPW – Current water supply for division 4 and 6 delivered by tractor and parked at outside workers housing area had disturb social activities among local and foreign workers. - Chicken, grazing area</p>	<p>Complied</p>



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		Tighten the security especially on Sunday due to trespassing boundary by outsider from SKVE.	
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance –	No smallholder scheme was involved in the certification units.	Complied
<b>Criterion 6.2</b>			
There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	SDPSB has developed a documented procedure in Sustainable Plantation Management System on handling social issues, Appendix 5, Version 1, and Issue No.1, dated 01/4/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Account and Administration Officer of mill and Assistant Manager of the estate have been appointed as Social officer to handle all issues related to social (internal and external) by the Mill Assistant Manager I (Izran Tugiran) and Senior Assistant Manager (Ahmarul Asuwad) dated 16/10/17 and 02/10/2017 respectively.	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Stakeholder’s meeting was conducted on 6/1/2017 with the participation from the external stakeholders in West POM. Meeting minutes was sighted and the issues raised during the meeting has been diverted to the coming Zone meeting and estate. No further issue was sighted. The management has implemented Repairs & Jobs Requisition – Bungalows & Line site for the internal workers to request any repair job required for the housing. The management has taken action to repair the requesting job. Stakeholder meeting was conducted on 26/10/2017 with the local communities in West Estate. Issues raised during the meeting was resolved. Meeting minutes was sighted. Stakeholder list was updated as at FY 2017/18 for both West POM and West Estate with the inclusion of local communities, government authorities, contractors and suppliers.	Complied

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<p><b>Criterion 6.3</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>			
6.3.1	<p>The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -</p>	<p>A documented dispute resolution procedure is available in Mill and Estate Quality Management System Manual which is effective, timely, appropriate and open to any affected parties. The complaint and grievances is open to effected parties including internal and external stakeholders.</p>	Complied
6.3.2	<p>Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance -</p>	<p>The mill management has implemented Internal and External Complaint logbook. Most of the complaints were regarding house repair such as pipe leaking (main pipe) and broken wall. The management has taken action to rectify the problem. The estate's management has implemented Workers' quarters/office/building repairs complaint record for internal workers. Most of the complaints were regarding house repair such as pipe leaking (main pipe) and broken wall.</p>	Complied
<p><b>Criterion 6.4</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
6.4.1	<p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -</p>	<p>SOP to identify legal and customary rights as well as people entitled to compensation has been established with titled "Handling Land Disputes" dated 1/11/2008. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied
6.4.2	<p>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</p>	<p>SOP as per Clause 6.4.1.</p>	Complied

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	ethnic groups' proof of legal versus communal ownership of land. - Minor compliance –		
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance –	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Complied
<b>Criterion 6.5</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	<p>The mill and estates have recruited local workers and foreign workers. The management has included basic pay, net pay, gross pay, deduction of salary, phone allowance and holiday pay on the pay slip. Payslip of month Jun'17, Nov'17 and Jan'18 for workers have been sampled as below:</p> <p>West POM:</p> <ul style="list-style-type: none"> <li>a) Employee No.: 115951</li> <li>b) Employee No.: 114901</li> <li>c) Employee No.: 61701</li> </ul> <p>West Estate:</p> <ul style="list-style-type: none"> <li>a) Employee No.: 57738</li> <li>b) Employee No.: 103990</li> <li>c) Employee No.: 109322</li> <li>d) Employee No.: 116849</li> </ul> <p>All the sampled workers below were achieved Minimum Wage Order 2016 of RM 1000/month or RM 38.46/ day.</p>	Complied
6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -	<p>Employment contract are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, holiday and annual leave and termination of services. The contract was signed by the workers and sampled contracts as below:</p> <ul style="list-style-type: none"> <li>a. Employee No.: 115951</li> <li>b. Employee No.: 114901</li> <li>c. Employee No.: 61701</li> <li>d. Employee No.: 57738</li> <li>e. Employee No.: 103990</li> <li>f. Employee No.: 109322</li> </ul>	Complied

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		<p>g. Employee No.: 116849</p> <p>Extension contracts were signed by the workers who have worked more than 3 years as below:</p> <p>h. Employee No.: 61701 (WOM)</p> <p>i. Employee No.: 57738 (WE)</p> <p>j. Employee No.: 103990 (WE)</p> <p>k. Employee No.: 109322 (WE)</p> <p>Employee No.: 116849 (WE)</p>	
6.5.3	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>- Minor compliance –</p>	<p>The management has provided water and electricity supply to the workers through government supply. Besides, the management has a medical facility in the compound where the employees are allowed to access the facility throughout the serving period without any charges. Employees are staying in the line-site provided by the management without any rental incurred.</p> <p>There is line site inspection conducted on weekly basis by Mohd Nazari (Medical Assistant) to West Oil Mill and West Estate. There is also line site Block C Longkang Clean Up activity on 12.02.18.</p>	Complied
6.5.4	<p>Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>Foods and goods for employees were provided through sundry shop at the vicinity of the operating units. Most of the sundry shops are operated by the former estates workers or family members. Besides, the mill and estate were nearby the town or village where the workers are easily access to the shop to purchase goods and foods. Interviewed with the workers found that they were understood and satisfied with the foods and goods price selling in the operating unit's compound.</p>	Complied
<p><b>Criterion 6.6</b></p> <p>The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.6.1	<p>A published statement in local languages recognising freedom of association shall be available.</p> <p>- Major compliance –</p>	<p>SDPSB 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. The policy is also available in Malay language which is understood by the local and Indonesian employees. For those who are</p>	Complied

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		non-Malay speakers, verbal explanation in their language are given.	
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance –	<p><u>West POM:</u> NUPW meeting was conducted on 20/12/2017 with total 10 participants. Meeting minute is sighted and no issue has been reported in the meeting. AMESU meeting was conducted on 2/2/2017 and no issue has reported, 2018 AMESU meeting is yet to be conducted. Interview with the Union representatives confirmed that no issue. There is also Union Day Celebration on 27.01.18.</p> <p><u>West Estate:</u> Meeting with NUPW was conducted on 25/7/2017 and 20/1/2017 with attendance list sighted. Meeting minutes was sighted. There were 6 issues raised during the meeting which are working overtime until 7pm on weekend, estate clinic operation is not consistent and no transport provided during emergency.</p>	Complied
<b>Criterion 6.7</b>			
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. Operating units are complied with the minimum age requirement. No employees below the age of 18 were sighted through the master list of active employee list and interview with worker.	Complied
<b>Criterion 6.8</b>			
Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance –	SDPSB has implemented Social Policy, 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 –	Mill has recruited local communities, women, and foreign workers to work in the mill. All of them are given equal opportunity and treat fairly on the housing provided, job that has been offered and salary. Salary of local workers and foreign workers were based on	Complied

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		MAPA/NUPW and Minimum Wage Order 2016 and no discrimination happened.	
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance –	There is no any discrimination based on religion, gender and nationality. during their recruitment. The recruitment process is based on skills, capabilities and medical fitness necessary.	Complied
<b>Criterion 6.9</b>			
There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance –	SDPSB 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. Briefing of policies were given to the workers during Safety Briefing on 07.10.17 about MSPO & RSPO Policy for West POM and on 14.01.2017 Training on Company Policy for West Estate.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance –	SDPSB 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. The policy was displayed on the notice board which was accessible by the workers. Briefing of policies were given to the workers during Safety Briefing on 07.10.17 about MSPO & RSPO Policy for West POM and Training on Company Policy for West Estate on 14.01.2017.	Complied
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 –	The mill and estate management have established a Gender Committee to discuss and resolve issues related to women. The managements had implemented procedure for sexual harassment grievance and complaint form to any incidences of sexual harassment is implemented. Gender Committee Meeting was conducted on 08/09/2017, 20/7/2017, 18/05/17 and 17/02/2017 in West POM. Meeting minutes were sighted and no sexual harassment or violence cases reported to date. Activities	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>have been conducted such as Lawatan ke Bukit Tinggi on 16.09.2017 and gift exchange on 20.07.2017.</p> <p>In West POM, there is a case of sexual harassment reported in the Gender Committee minutes of meeting dated 20.07.17 where the clinic attendant (West Estate) was sexually harassed through whatsapp by receiving nudity photos and videos from Mill Lab Operator on 31/07/17. There was an internal investigation done as per company policy and the said worker (mill operator) was terminated on 28.8.17 by West POM. Case was considered closed. Interviewed with the victim also been made at West Estate during the audit.</p> <p>Meeting was conducted on 10/1/2018, 19/10/2017, 18/7/2017 and 14/3/2017 in West Estate. The same sexual harassment case sighted as per West POM as the case involved 1 mill worker and 1 estate worker. Other than that, the committee has organized activities such Aerobic dance and cooking class.</p> <p>Briefing of policies were given to the workers during Safety Briefing on 07.10.17 about MSPO &amp; RSPO Policy for West POM and on 14.01.2017 Training on Company Policy for West Estate.</p>	
<p><b>Criterion 6.10</b>            Growers and millers deal fairly and transparently with smallholders and other local businesses.</p>			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	West POM process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	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 -	West POM process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	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 contracts were as below: a. Dynamic Attraction Enterprise: signed on 29/9/2016 and valid from 01.11.16 until 30.11.17 for supply contract labour for grass cutting at KKS West. Extension of	Complied

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		<p>contract been made for another 6 months from 01.12.17 until 31.05.18.</p> <p>b. Lotus Two Enterprise: signed on 27.2.17 and valid for 1 year from 01.03.17 for contract labour supply for central east region palm oil mills.</p> <p>The terms and conditions were stated in the agreement.</p>	
6.10.4	<p>Agreed payments shall be made in a timely manner.</p> <p>- Minor compliance -</p>	<p>Payment will be made upon inspection and checking on work standard every 6<sup>th</sup> and 21<sup>st</sup> day of the month prior to submission for monthly payment. Payment was made through the financial department at head office.</p> <p>Seen the sampled payment as below:</p> <p>a. Invoice No: 251117-11, date: 22.11.17 amount RM 9,858 for grass cutting at KKS West.</p> <p>b. Invoice No: I-0332, date: 20.6.17 amount RM 11,752.02 for supply skill labour for repair/maintenance at KKS West.</p> <p>Interviewed with the contractors confirmed that the payment was made promptly.</p>	Complied
<p><b>Criterion 6.11</b>            Growers and millers contribute to local sustainable development where appropriate</p>			
6.11.1	<p>Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.</p> <p>- Minor compliance -</p>	<p>The mill and estate’s management have made contribution to the local communities, school and the internal stakeholders such as accommodating various visitors request from France Ambassador (24.01.18), BOD Visit (17.01.18) Indonesian University Students (23.01.18) and Farewell to Alwalluddin (23.01.18). In West Estate, there were request for field usage for annual sport day on 30.9.17, Cash advance for celebrating Deepavali Day on 11.10.17, blood donation activity on 24.10.17.</p> <p>Interviewed with the local community and school representatives confirmed that the management was very supportive to provide contributions to them upon request.</p>	Complied
6.11.2	<p>Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.</p>	<p>There were no scheme smallholders under the certification unit.</p>	Complied



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Criterion / Indicator		Assessment Findings	Compliance
- Minor compliance –			
<b>Criterion 6.12</b>			
No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	All employees are legal with local identification card for local employees and foreign employees are with valid passports and working permits. No evident of trafficked workers were found during the audit.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Major compliance –	No contract substitution was noted in the document as well as based on the worker’s interview during line site visit.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Minor compliance –	Equal opportunity and non-discriminatory policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals.	Complied
<b>Criterion 6.13</b>			
Growers and millers respect human rights.			
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 -	The Social and Humanity management policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations. Briefing of policies were given to the workers during Safety Briefing on 07.10.17 about MSPO & RSPO Policy for West POM and on 14.01.2017 Training on Company Policy for West Estate.	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.	This site is located at Peninsular Malaysia, hence this requirement is not applicable.	NA
<b>PRINCIPLE 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS</b>			
West Palm Oil Mill Certification Unit and supply base did not carry out any new plantings or conversion after last assessment. Therefore, Principle 7 is not applicable during this assessment. The immature areas are of oil palm replanting.			
<b>PRINCIPLE 8: COMMITMENT TO CONTINUAL IMPROVEMENT IN KEY AREAS OF ACTIVITY</b>			
<b>Criterion 8.1</b>			
Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			
8.1.1	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	Continual improvement plan was established at WPOM and West Estate using Kaizen Charter, e.g.: <ul style="list-style-type: none"> <li>To reduce sand carry over to clarification station</li> <li>To reduce CPO penalty charged by buyers</li> </ul>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>Indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides (Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);</li> <li>• Optimising the yield of the supply base;</li> </ul> <p>- Major compliance –</p>	<ul style="list-style-type: none"> <li>• To eliminate number of bunches falling into the drain</li> <li>• To reduce cost of chemical and mixing</li> </ul>	

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**Appendix B: Approved Time Bound Plan**
**SDP- RSPO Certification Status for Malaysia Operations**

SO U 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 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 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 Sembilan	19 May '10	18-May-20	RSPO 541905	
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 commissione

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						d 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 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 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 closed down
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Mill closed down
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	N.A

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

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

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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	
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 **West 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 data 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 **West Palm Oil Mill** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.1
PKO	1.1

Extraction	%
OER	19.96
KER	4.67

Production	t/yr
FFB Process	222,788.90
CPO Produced	44,464.18
PKO Produced	0

Land Use	Ha
OP Planted Area	19,096
OP Planted on peat	140.6624
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>19,096</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e/FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/FFB
<b>Emission</b>								
Land Conversion	49,612.77	0.35	31,051.9	0.38	0	0	80,664.67	0.36
CO <sub>2</sub> Emission from fertilizer	3,247.54	0.02	2,401.61	0.04	0	0	5,649.15	0.03
NO <sub>2</sub> Emission	4,503.68	0.03	2,146.29	0.82	0	0	6,649.97	0.03
Fuel Consumption	698.27	0	438.56	0	0	0	1,136.83	0.01
Peat Oxidation	0	0	114.64	0.02	0	0	114.64	0
<b>Sink</b>								
Crop Sequestration	-46,886	-0.33	-29,420.46	-0.36	0	0	-76,306.46	-0.34
Conservation Sequestration	0	0	0	0	0	0	0	0
<b>Total</b>	<b>11,175.75</b>	<b>0.08</b>	<b>6,732.54</b>	<b>0.11</b>	<b>0</b>	<b>0</b>	<b>17,908.29</b>	<b>0.08</b>

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*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	40,413.42	0.18
Fuel Consumption	160.68	0
Grid Electricity Utilization	1,894.3	0.01
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>42,468.40</b>	<b>0.19</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	10,396.70
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

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



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

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
	<b>Requirement</b>	<b>Evidence</b>	<b>Compliance</b> (Yes / No or N/A) For any N/A raised, justification is required.
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.	West Palm Oil Mill takes legal ownership and physically handles its RSPO certified oil palm products i.e. CPO and PK.	Complied
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.	West 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.	Complied
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.	Complied
<b>5.2 Supply chain model</b>			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	The FFB suppliers are of RSPO certified estates which consists of West certification unit and other certified Sime Darby group estates only. Declassification of the CPO or PK was done in accordance to the correct order.	Complied
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	West POM is IP certified and sales of the products were of IP or conventional only.	Complied
<b>5.3. Documented Procedures</b>			

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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"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	<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"> <li>• Responsibilities</li> <li>• control of documents &amp; records</li> <li>• delivery of FFB from the estate</li> <li>• receiving FFB at the mill</li> <li>• process monitoring</li> <li>• CPO and PK dispatch</li> <li>• Non-conforming products and/or documents</li> <li>• Product claims</li> <li>• Outsourced contractor</li> <li>• Training</li> <li>• Reclassification of mill's supply chain model</li> <li>• Production volume</li> <li>• Conversion factors</li> <li>• Internal audit</li> <li>• Complaints</li> <li>• Management review</li> </ul>	Complied
	<ul style="list-style-type: none"> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	<p>Among the records included in the procedures are:</p> <ul style="list-style-type: none"> <li>• Weighbridge tickets</li> <li>• Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document</li> <li>• Daily production report</li> <li>• Record and balance</li> </ul>	Complied
	<ul style="list-style-type: none"> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.</li> </ul>	<p>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.</p>	Complied
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<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 annually in accordance to Internal Audit Procedure (SD/SDP/PSQM/IAP). However, the internal audit for RSPO supply chain has yet to be conducted.</p>	Major nonconformance

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		Therefore, NCR is assigned due to this lapse.	
	ii) effectively implements and maintains the standard requirements within its organization	The internal audit for RSPO supply chain has yet to be conducted. Therefore, NCR is assigned due to this lapse (refer above).	Major nonconformance
<b>5.4. Purchasing and goods in</b>			
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"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>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"> <li>• Consignment note no. – 04783</li> <li>• Estate’s names – New Labu Estate</li> <li>• Date &amp; time of delivery – 14/11/17 @ 0702 hr</li> <li>• Field No. – 06</li> <li>• No. of bunches – e.g. 404</li> <li>• Vehicle no. – e.g. DAA 8441</li> <li>• Seal no. – e.g. 069284</li> </ul> <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.: 222733</li> <li>• Name of estates – New Labu</li> <li>• Field No. – P06C</li> <li>• Name of driver – Gunalan</li> <li>• Vehicle no. – DAA 8441</li> <li>• Date &amp; time in/out – 14/11/17 @ 1044 in, 1108 out</li> <li>• Total bunches - 404</li> <li>• Seal no. – 069284</li> <li>• Net weight – 10.77</li> </ul>	Complied
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	The information was available in various documents such as delivery order and weighbridge tickets.	Complied
	<ul style="list-style-type: none"> <li>• The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping</li> </ul>	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	Complied

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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. E.g. Labu and New Labu estates, certificate no.: CU-RSPO-855480, validity 30/12/2016 to 29/12/2021.	
	<ul style="list-style-type: none"> <li>A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	The checking of validity was done through crosschecking between the list of certified suppliers and RSPO website. Apart from that, copies of valid certificates for all the suppliers were obtained by the mill.	Complied
	<ul style="list-style-type: none"> <li>The validity of license for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements.</li> </ul>	NA – the mill does not purchase FFB from any trader.	NA
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.	Complied
<b>5.5. Outsourcing activities</b>			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill 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>	Ref.: Agreement between Sime Darby Plantation Bhd and Jasa Bumi Logistics Sdn Bhd., dated 19/12/2017. Requirement to adhere to RSPO Supply Chain Standard is stated in clause 3 Sustainability and Traceability of Product.	NA

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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
<b>5.6. Sales and goods out</b>			
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"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> </ul>	Based on the sampled sales contracts, all the required information was available in various sales documents.	Complied

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	<ul style="list-style-type: none"> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>		
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	Information is complete and available in various documents such as sales contract, mill weighbridge ticket, delivery note, transporter collection order.	Complied
	<ul style="list-style-type: none"> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	Based on PalmTrace transaction report, there was 37 shipping announcement of CSPO and 10 shipping announcement for CSPK made since the last assessment.	Complied
<b>5.7. Registration of transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>• are mills, traders, crushers and refineries and;</li> <li>• take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	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.	Complied
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>• Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement /</li> </ul>	Based on the announcement summary, all the registrations were found to be in order.	Complied

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	Announcement is based on members' own standard operating procedures.		
	<ul style="list-style-type: none"> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> </ul>	Not applicable. Products are not sold beyond refinery.	NA
	<ul style="list-style-type: none"> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	Based on the MB accounting, the removal of volumes was done correctly when the products were sold as conventional.	Complied
	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	Based on the announcement summary, all the confirmations were found to be in order.	Complied
<b>5.8. Training</b>			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training plan for 2017/2018-by Stations were available – incorporation with other training plans such as safety, environment and operations.	Complied
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.	<p>Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation such as QA, Technical conductor, wireman, store clerk, lab supervisor, weighbridge operator, auxiliary police, OSH coordinator and OSH committee. In West POM case, 7 personnel were identified.</p> <p>Based on training records, last training was conducted on 12/2/2018 and attended by 5 person out of 10 identified. Another 5 staff will attend the similar training in other session which is planned to be conducted in March 2018</p>	Complied
<b>5.9. Record Keeping</b>			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible.	Complied

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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.	Complied
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.	NA
<b>5.10. Conversion factors</b>			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER. Previous period under review's average were 19.89% (OER) & 4.67% (KER).	Complied
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.	Complied
<b>5.11. Claims</b>			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
<b>5.12. Complaints</b>			
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.	Complied
<b>5.13. Management Review</b>			



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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 has yet to be conducted. Therefore, a non-conformity was assigned due to this lapse.	Major nonconformance
5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	Management review has yet to be conducted. Therefore, a non-conformity was assigned due to this lapse.	Major nonconformance
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>	Management review has yet to be conducted. Therefore, a non-conformity was assigned due to this lapse.	Major nonconformance

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**Appendix E**

**: CPO Mill Supply Chain Assessment Report (Module *D* - CPO Mills: *Identity Preserved*)**

Requirements	Compliance
<b>D.1 Definition</b>	
<p>D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.</p>	<p>West Palm Oil Mill only accepts certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&amp;C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>
<b>D.2 Explanation</b>	
<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 certification body (CB) in the public summary of the P&amp;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.</p>
<p>D.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 Palmtrace or book and claim). The registrations were made by Sime Darby's Global Trade &amp; Marketing based at KL HQ.</p>
<b>D.3 Documented procedures</b>	
<p>D.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 Identity Preserved (IP) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB is under SOP for Sustainable Supply Chain and Traceability" [appendix 15 of the Sustainable Plantation Management System (SPMS)], version 2, dated Feb 2018.</p> <p>This was developed based on the RSPO SCCS July 2017. The mill manager has the responsibility to ensure</p>

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	implementation assisted by the on-site compliance executive. The IP model is used because only certified FFB from own supply base is received and processed at West Palm Oil Mill.
b) 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 site's procedures for the implementation of this standard.	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.
D.3.2 The site shall have documented procedures for receiving and processing certified FFBs.	West Palm Oil mill has documented procedures (as mentioned in D 3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified FFBs.
<b>D.4 Purchasing and goods in</b>	
D.4.1 The site shall verify and document the tonnage and sources of certified FFBs received.	<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"> <li>• Consignment note no. – 04783</li> <li>• Estate's names – New Labu Estate</li> <li>• Date &amp; time of delivery – 14/11/17 @ 0702 hr</li> <li>• Field No. – 06</li> <li>• No. of bunches – e.g. 404</li> <li>• Vehicle no. – e.g. DAA 8441</li> <li>• Seal no. – e.g. 069284</li> </ul> <p>E.g. of information available in the mill's weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.: 222733</li> <li>• Name of estates – New Labu</li> <li>• Field No. – P06C</li> <li>• Name of driver – Gunalan</li> <li>• Vehicle no. – DAA 8441</li> <li>• Date &amp; time in/out – 14/11/17 @ 1044 in, 1108 out</li> <li>• Total bunches - 404</li> <li>• Seal no. – 069284</li> <li>• Net weight – 10.77</li> </ul>
D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	There was a projected overproduction of certified tonnage i.e. a total of 26,510 mt of CSPO and 5,273 mt of CSPK. The certification unit has informed the CB and the necessary volume extension was made in the PalmTrace thereafter.
<b>D.5 Record keeping</b>	

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D.5.1 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.	The record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on real-time basis was not available for verification. Therefore, a major non-conformity was assigned due to this lapse.
<b>D.6 Processing</b>	
D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm product including during transport and storage to strive for 100% separation.	The mill does not accept any FFB from non-RSPO certified estates. This is guided by their SOP for Sustainable Supply Chain and Traceability, clause 7.0. Verification of FFB receipt records also showed that all the FFBs were sourced from Sime Darby's certified supplying estates.

**Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply bases (MT)	Volume of FFB from uncertified supply bases (MT)	Total FFB/Month (mt)
1	Feb 2017	15,139.32		15,139.32
2	Mar 2017	20,703.40		20,703.40
3	Apr 2017	21,265.98		21,265.98
4	May 2017	20,909.45		20,909.45
5	Jun 2017	18,386.42		18,386.42
6	Jul 2017	16,465.81		16,465.81
7	Aug 2017	20,344.30		20,344.30
8	Sep 2017	17,786.24		17,786.24
9	Oct 2017	17,656.49		17,656.49
10	Nov 2017	20,425.76		20,425.76
11	Dec 2017	19,202.42		19,202.42
12	Jan 2018	21,832.96		21,832.96
<b>Total</b>		<b>230,118.55</b>		<b>230,118.55</b>

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Feb 2017	3,864.457	893.334
2	Mar 2017	4,180.026	988.444
3	Apr 2017	4,256.936	1,029.985
4	May 2017	3,994.640	955.795

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5	Jun 2017		3,647.130	861.006
6	Jul 2017		3,243.348	814.915
7	Aug 2017		4,135.787	960.575
8	Sep 2017		3,612.144	861.417
9	Oct 2017		3,566.057	840.603
10	Nov 2017		4,061.024	902.161
11	Dec 2017		3,793.952	856.779
12	Jan 2018		4,274.397	1,036.854
<b>Total</b>			<b>46,629.90</b>	<b>11,001.87</b>

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading No</b>	<b>Certified CPO Sold (MT)</b>	<b>Certified PK Sold (MT)</b>
1	Non-disclosure	TR-c26f5a2c-3afe	378	
2	Non-disclosure	TR-ced1f77e-f5a5	250	
3	Non-disclosure	TR-46e8d51d-1566	250	
4	Non-disclosure	TR-60c90b46-744c	250	
5	Non-disclosure	TRba3a0805-b7e9	250	
6	Non-disclosure	TR-7f4d5277-da4e	250	
7	Non-disclosure	TR-df73c2f6-881d	250	
8	Non-disclosure	TR-6647da9d-4f59	250	
9	Non-disclosure	TR-1dd7b1b9-a598	250	
10	Non-disclosure	TR-38a47427-cc00	250	
11	Non-disclosure	TRc28d73d9-94c3	250	
12	Non-disclosure	TRb8a94c97-4247	250	
13	Non-disclosure	TR-05c2223c-9877	250	
14	Non-disclosure	TR-1e168a77-d472	250	
15	Non-disclosure	TR-3731db5b-59f3	250	
16	Non-disclosure	TRe33b04d6-a119	250	
17	Non-disclosure	TR-fb728a59-b6b1	250	
18	Non-disclosure	TR-f8b9286e-34f8	400	
19	Non-disclosure	TR-1e611803-3f5e	400	
20	Non-disclosure	TR-3f4415e7-4a12	250	
21	Non-disclosure	TR-7a122192-9b59	250	
22	Non-disclosure	TR-6d4dad2b-4075	250	
23	Non-disclosure	TR-f0e3ff57-70e8	250	

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24	Non-disclosure	TR-e2a96b8a-ddfe	250	
25	Non-disclosure	TR-94860f43-a77e	250	
26	Non-disclosure	TR-9b17ee19-8d1b	250	
27	Non-disclosure	TR-7554a718-2d8b	250	
28	Non-disclosure	TR-995155f5-97fd	250	
29	Non-disclosure	TR-b99e13f6-ad55	250	
30	Non-disclosure	TR-146145ed-09ba	250	
31	Non-disclosure	TR-20f229b8-d7da	400	
32	Non-disclosure	TR-66112c64-9e3d	400	
33	Non-disclosure	TR-0b80d10d-5cff	400	
34	Non-disclosure	TR-aa5f77bf-e27b	400	
35	Non-disclosure	TR-d7d5501b-ce28	300	
36	Non-disclosure	TR-02006381-0e12	300	
37	Non-disclosure	TR-7ef40f95-7fe6	300	
38	Non-disclosure	TR-c4a0b8dff-ed4		500
39	Non-disclosure	TR-9b5becfa-f6a6		750
40	Non-disclosure	TR-82c244ff-541b		700
41	Non-disclosure	TR-092a2331-96d4		450
42	Non-disclosure	TR-6e52b4da-396a		100
43	Non-disclosure	TR-db0fced3-88ee		650
44	Non-disclosure	TR-e9cbfc57-d5b0		400
45	Non-disclosure	TR-793c24cda445		400
46	Non-disclosure	TRcd5a9c81-2d34		800
47	Non-disclosure	TR-6990f10d-8376		700
<b>Total</b>			<b>10,428</b>	<b>5,450</b>

<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Scheme Name</b>	<b>CPO Sold (MT)</b>	<b>PK Sold (MT)</b>
			0	0

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<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>CPO Sold (MT)</b>	<b>PK Sold (MT)</b>
1	Non-disclosure	36,201.90	
2	Non-disclosure		5,551.87
	Total	36,201.90	5,551.87

<b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading No</b>	<b>RSPO Credits of Certified CPO Sold (MT)</b>
			0

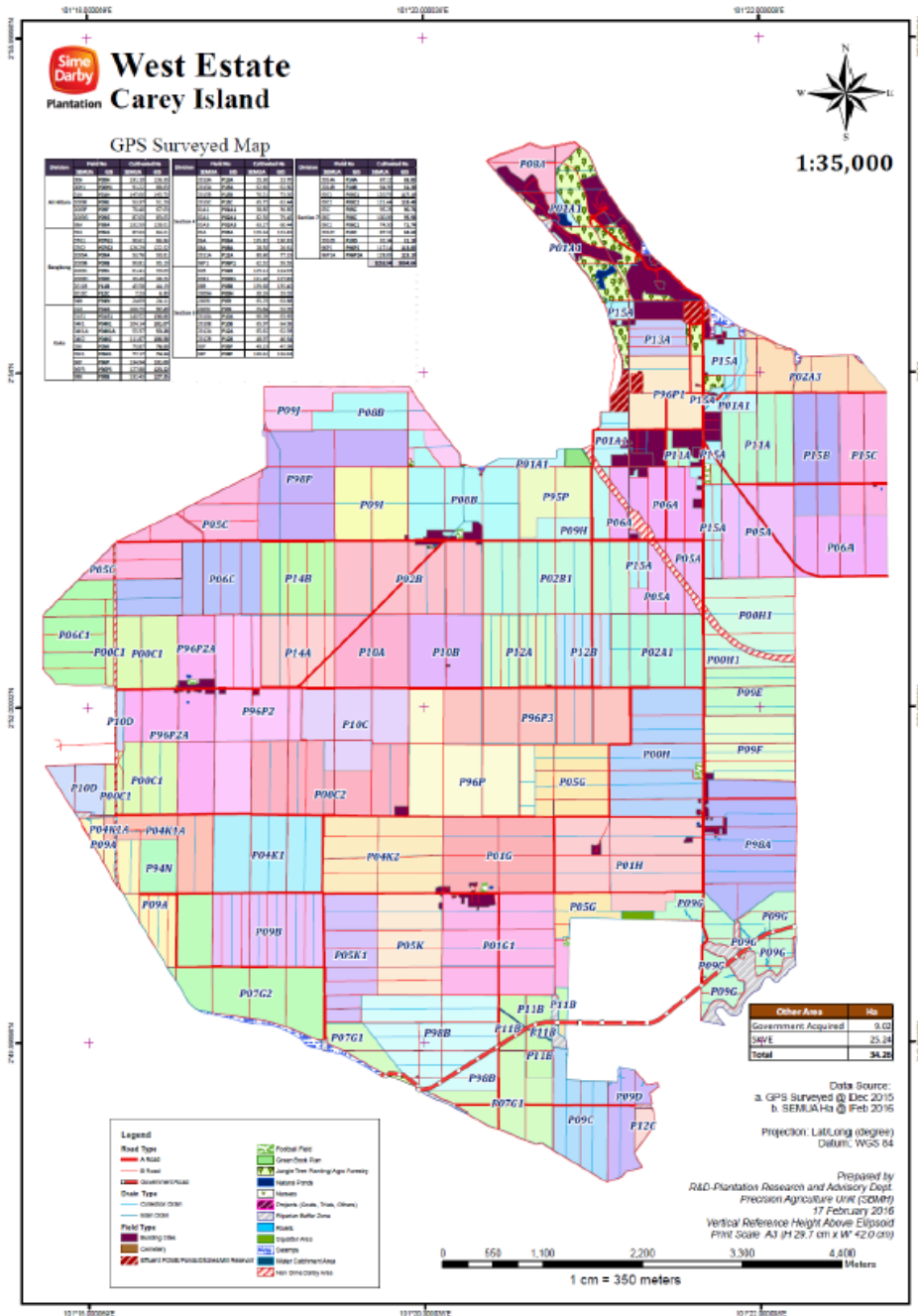
**Appendix F: Location Map of West Palm Oil Mill Certification Unit and Supply bases**





**Appendix G: Estate Field Map**

**West Estate**



**Appendix H: List of Smallholder Sampled**

Not applicable.

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