

**RSPO PRINCIPLE AND CRITERIA –
1st ANNUAL SURVEILLANCE ASSESSMENT (ASA2_1)
Public Summary Report**

Johor Corporation
Client company Address: Kulim (Malaysia) Berhad K.B. 705 80990 Johor Bahru Johor, Malaysia
Certification Unit: Sindora Palm Oil Mill and supply base Location of Certification Unit: KB 501 86009 Kluang, Johor Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0080-09-000-00	Membership Approval Date	15/06/2009
Parent Company Name	Johor Corporation		
Address	KB 705 80990 Johor Bahru, Johor, Malaysia		
Subsidiary (Certification Unit Name)	Kulim (M) Berhad – Sindora Palm Oil Mill		
Address	KB 501 86009 Kluang, Johor, Malaysia		
Contact Name	Mdm Salasah Elias		
Website	www.kulim.com.my	E-mail	salrasah@kulim.com.my
Telephone	07 8611611	Facsimile	07 8631084

2. Certification Information			
Certificate Number	RSPO 612392	Date of First Certification	23/01/2009
		Certificate Start Date	23/01/2019
		Certificate Expiry Date	22/01/2024
Scope of Certification	Palm oil and Palm Kernel Production		
Applicable Standards	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E – Mass Balance)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
A116159	MS 1500:2009	JAKIM	30/6/2021
QMS 00722	ISO 9001:2015	SIRIM QAS International Sdn Bhd	21/11/2020
EU-ISCC-Cert- DE119-60182024	ISCC EU	ASG CERT	12/03/2020
EMS 00417	ISO 14001:2015	SIRIM QAS International Sdn Bhd	20/9/2020
MSPO 697951	MS2530-4 Malaysia Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	09/03/2024
MSPO 697952	MS2530-3 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
Sindora Palm Oil Mill	Kluang, Johor, Malaysia	1° 59' 7.34" N	103° 27' 44.32" E
Sindora Estate	Kluang, Johor, Malaysia	1° 57' 48.11" N	103° 28' 17.98" E
Sungai Papan Estate	Kota Tinggi, Johor, Malaysia	1° 31' 1.25" N	104° 6' 21.81" E
REM Estate	Kota Tinggi, Johor, Malaysia	1° 42' 12.4" N	103° 52' 59.7" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sindora Estate	13,655.04	20.21	243.81	3,919.06	93.26
Sungai Papan Estate	2,835.19	11.49	138.56	12,985.24	94.64
REM Estate	1,865.11	21.75	354.10	12,240.96	83.23
Total	8,355.34	53.45	736.47	9,145.26	91.26

Note: ¹Difference in figures compared to previous report due to error in calculation of planted area reported last year.

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Sindora Estate	1,329.84	1,611.00	714.20	0	0	2,325.20	1,329.84
Sungai Papan Estate	221.12	1,241.55	1,372.52	0	0	2,614.07	221.12
REM Estate	580.24	738.04	66.11	28.38	452.34	1,284.87	580.24
Total	2,131.20	3,590.59	2,152.83	28.38	452.34	6,224.14	2,131.20

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Feb 2019-Jan 2020)	Actual (Oct 2018-Sep 2019)	Forecast (Feb 2020-Jan 2021)
Sindora Estate	89,672.86	45,647.45	54,436
Sungai Papan Estate	33,741.50	69,065.37	76,241
REM Estate	55,935.78	26,524.85	25,164

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Total	179,350.14	141,237.67	155,841
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8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (Feb 2019-Jan 2020)	Actual (Oct 2018-Sept 2019)	Forecast (Feb 2020-Jan 2021)
Nil	N/A		N/A
Total			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (Feb 2019-Jan 2020)	Actual (Oct 2018-Sept 2019)	Forecast (Feb 2020-Jan 2021)
Nilai Megah	9,104	8,530.88	5,052.00
Per. Sri Misan	17,928	19,068.55	15,146.00
Per. Md Sangidi	3,801	9,899.74	5,052.00
Eng Lee Heng Trading	58,659	76,580.35	55,542.00
Choon Guan	0	1,319.47	3,367.00
Az Iman	0	17.88	0
Genting Kulai Besar	0	782.44	0
Kebun Sedenak	0	314.94	0
Kind Action	0	99.44	0
Ree Fong	1,634	0	0
Per. Sri Mahtai	1,367	282.55	0
Hup Guan	477	0	0
Che Yu Trading	1,541	0	0
TH Plantation	0	0	0
Total	94,511	116,896.24	80,792.00

10. Certified Tonnage			
Mill Capacity: 60 MT/hr	Estimated (Jan 2019-Dec 2019)	Actual (Oct 2018-Sept 2019)	Forecast (Jan 2020-Dec 2020)

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SCC Model: MB	FFB	FFB	FFB
	179,350.14 mt	141,237.67 mt	155,841 mt
	CPO (OER: 20.94%)	CPO (OER: 21.49%)	CPO (OER: 22.11%)
	37,573.85 mt	30,352.85 mt	34,457 mt
	PK (KER: 5.35%)	PK (KER: 5.20%)	PK (KER: 5.35%)
9,695.23 mt	7,349.76 mt	8,331 mt	

11. Actual Sold Volume (CPO) (Oct 2018-Sept 2019)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	1,221.71	900.03	0	27,927.58	30,049.59

Conventional product = product that is produced using certified FFB but sold without RSPO claim.

12. Actual Sold Volume (PK) (Oct 2018-Sept 2019)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	363.58	0	0	6,912.68	7,276.26

Conventional product = product that is produced using certified FFB but sold without RSPO claim.

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd
Suite 29.01 Level 29
The Gardens North Tower
Mid Valley City
Lingkaran Syed Putra
59200 Kuala Lumpur
Tel: +603-9212 9638, Fax: +603-9212 9639
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted from 7-10/10/2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification 2)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Sindora Palm Oil Mill	✓	✓	✓	✓	✓
Sindora Estate	✓	✓	✓	✓	✓
Sungai Papan Estate	✓	✓	✓	✓	✓
REM Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: October 12, 2020 – October 15, 2020

Total No. of Mandays: 13.0 mandays including one day SC audit for mill

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Valence Shem	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

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		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.
Muhamad Mazeli	Naquiuddin Team Member	He hold Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as Safety and Health Officer, Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and already attend HCV training with Proforest. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation. He is fluent in Bahasa Malaysia and English languages.
Rahayu Zulkifli	Team Member	Holds a Degree in LLB (Hon), she was a practicing lawyer before joining WWF-Malaysia and RSPO as a Dispute Settlement Facility Manager. She is now working as a freelance RSPO auditor. In this assessment, the focus element includes social aspects, legal requirements, employees welfare and stakeholders consultations. She is able to communicate in Bahasa Malaysia and English.
Mohamed Abidin	Hidhir Zainal Team Member	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects supply chain for the mill.

Accompanying Persons:

No.	Name	Role
	Nil	

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2.3 Assessment Plan

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

Date	Time	Subjects	VSH	RAZ	MNM	MHZ
Monday 7/10/2019 Sindora POM	0830-0900	Opening meeting: <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation) 	✓	✓	✓	✓
	0900-1300	Sindora POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓	✓	-
		Sindora POM RSPO Supply Chain Site visit: Incoming of FFB and outgoing of CSPO & CSPK – weighbridge, ramp, storage area, loading bays, etc. Documentation review: RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	-	-	-	✓
	1000 - 1300	Stakeholder consultations: Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-	-
	1300-1400	Lunch break				
	1400-1630	Sindora POM Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	✓	✓	✓	-
		Sindora POM RSPO Supply Chain Continue with unfinished elements.	-	-	-	✓
1630-1700	Interim closing briefing	✓	✓	✓	✓	
Tuesday 8/10/2019 Sg Papan Estate	0900-1300	Sg Papan Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓	-
	1300-1400	Lunch break				

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	1400-1630	Sg Papan Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓	-
	1630-1700	Interim closing briefing	✓	✓	✓	-
Wednesday 9/10/2019 REM Estate	0900-1300	REM Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓	-
	1300-1400	Lunch break				
	1400-1630	REM Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓	-
	1630-1700	Interim closing briefing	✓	✓	✓	-
Thursday 10/10/2019 Sindora Estate	0900-1300	Sindora Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓	-
	1300-1400	Lunch break				
	1400-1530	Sindora Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓	-
	1530-1600	Audit team discussion & preparation for closing meeting	✓	✓	✓	✓
	1600-1700	Closing meeting	✓	✓	✓	✓

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Kulim (Malaysia) Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	Yes	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	Yes	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to our mill.	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No	Yes
Have there been any stakeholder comments?	No	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3:	So far no new planting that replaced primary forest.	Yes

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<ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 		
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new planting activities within uncertified unit.	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. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . The progress on the Liabilities shall be verified and reported.	No land conflict	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour dispute	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non compliance	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	RSPO internal audit assessment for all certified units been conducted and the report had been submitted to all unit for improvement plan.	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? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable.	

3.4 Details of findings

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

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During the 1st annual surveillance assessment there was one (1) Major nonconformity raised. However, Sindora palm Oil Mill Certification Unit has appealed to BSI to withdraw the NC due to uncertainty to interpretation. BSI has taken the necessary follow up including contacting the RSPO Office to rectify the issue. Based on the results of the follow up, BSI has decided to withdraw the NC. Justification of the NC being withdrawn can be seen in the format below:

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1831667-201906-M1	Clause & Category (Major / Minor)	RSPO SCCS E5.1 Major
Date Issued	10/10/2019	Due Date	07/01/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/11/2019
Statement of Nonconformity:	Record and balance of all receipts of RSPO certified deliveries were not tally by end of 3 month		
Requirement Reference:	a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. (b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short. (i.e product can be sold before it is in stock.)		
Objective Evidence:	Noted that credit sales of CPO for 10,000 mt on November 2018 and short sale of 5,814.89 mt. By end of January 2019, volume required is still insufficient for the total of 550.27 mt.		
Corrections:	NA		
Root Cause Analysis:	NA		
Corrective Actions:	NA		
Assessment Conclusion:	Discussion with RSPO Secretariat confirms that RSPO credits can be accumulated and sold by end of the license period. Despite this is Identity Preserved certification, the selling of RSPO Credits does not require to follow the real time basis. As long as there is accumulation of the credits are not negative stock base on the actual production versus oil sold as RSPO certified / other scheme certified, credits are permitted to sold as when it is available. Thus, this NC is withdrawn.		

Opportunity for Improvements	
OFI #	Description
OFI 1	1831667-201906-I1 Indicator 4.7.2 Details : To update and ensure the procedure on safety was properly documented.
OFI 2	1831667-201906-I2 Indicator 5.6.3

	<p>Details:</p> <p>The value claimed for “sale of excess PKS for energy production” reported in RSPO GHG calculator can be further improved by obtaining verifiable documents to ensure that the sold excess PKS was really used for energy production.</p>
OFI 3	<p>1831667-201906-I3</p> <p>Indicator 6.5.2</p> <p>Details:</p> <p>To improve the effectiveness of the explanation given to workers on the option given for workers to either keep their own passport, or to keep their passports at the estate office.</p>
OFI 4	<p>1831667-201906-I4</p> <p>Indicator 6.10.3</p> <p>Details:</p> <p>To ensure contractors’ understanding of all the terms and conditions of the contracts they enter into, in particular contracts prepared in English; a language they are not conversant in.</p>

Positive Findings	
PF #	Description
PF 1	

3.4.1 Status of Nonconformities Previously Identified and Observations

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1692268-201809-M1	Clause & Category (Major / Minor)	Indicator 5.3.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	02/01/2019
Statement of Nonconformity:	The documented procedure is not updated as per RSPO SCC Standard Version June 2017 & RSPO Rules on Market Communications & Claims (version 2016).		
Requirement Reference:	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: <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 		
Objective Evidence:	The SOP Sustainable Management System, Traceability, Doc. No: SQD/SMS/1.2 Date 1 July 2018. However, the activity of CPO and PK sales transaction is not covered under the Traceability procedure. Management has the SOP: CSPO Supply Chain Rev: 00 Procedure No: MKD/001 dated 08 February 2012. Both procedures are not updated and cross-referenced with RSPO SCC Standard Version June 2017 & RSPO Rules on Market Communications & Claims (version 2016).		
Corrective Actions:	<p>Re-Training on RSPO SCC Standard Version June 2017 and RSPO Rules on Market Communications & Claims (version 2016) should be organize for all Palm Oil Mills, Marketing and Sustainability Department.</p> <p>Major NC close out verification: Procedures for RSPO SCC have been revised, Sustainable Management System SQD/SMS/1.2, rev: 1 dated 9/10/18 and CSPO Procedure MKD/001, rev:01 dated 9/10/18. The component of CPO and PK sales has been updated in the procedure.</p> <p>RSPO SCC training was carried on 26/12/18 by external trainer for the new RSPO SCC Standard June 2017. The intent of training is to update the necessary changes in the standard to be in lined with company's SOPs and implementation. Relevant mill personnel and marketing department were involved in the training. Re-training of RSPO SCC SOP was carried out on 28/12/18 by Assistant Engineer for all relevant mill personnel to update the latest changes in the SOP.</p>		
Assessment Conclusion:	<p>ASA2_1 verification:</p> <p>Based on interview with the mill personnel (weighbridge operator and assistant engineer), they are able to explain the process of CPO and PK sales including reconciliation process of volume traded, announce and delivered on monthly basis. Thus, the NCR is remain closed.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1692268-201809-M2	Clause & Category (Major / Minor)	RSPO SCCS 5.4.2 Major

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Closed (Yes / No)	Yes	Date of nonconformity Closure	02/01/2019
Statement of Nonconformity:	The SOP for handling the non-conforming product is not includes the FFB handling process.		
Requirement Reference:	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.		
Objective Evidence:	Sindora POM has the SOP, Core Process, Control of Non-Conforming Product, Doc. NoL SNPOM/SOP/8.20 dated 01 Jan 2018 but so far, no non-conforming product related to RSPO reported however, it is not cover on the FFB handling process.		
Corrective Actions:	<p>Re-Training on Traceability SOP and the related RSPO SCC Standard Version June 2017 and RSPO Rules on Market Communications & Claims (version 2016) should be organize for all Palm Oil Mills, Marketing and Sustainability Department.</p> <p>Major NC close out verification: Procedures for RSPO SCC have been revised, Sustainable Management System SQD/SMS/1.2, rev: 1 dated 9/10/18 and CSPO Procedure MKD/001, rev:01 dated 9/10/18. The component of FFB handling @ non-conforming product has been updated in the procedure.</p> <p>In-house RSPO SCC training was carried on 26/12/18 by external trainer for the new RSPO SCC Standard June 2017. The intent of training is to update the necessary changes in the standard to be in lined with company's SOPs and implementation. Relevant mill personnel and marketing department were involved in the training.</p> <p>Re-training of RSPO SCC SOP was carried out on 28/12/18 by Assistant Engineer for all relevant mill personnel to update the latest changes in the SOP.</p>		
Assessment Conclusion:	<p>ASA2_1 verification: Based on interview with the mill personnel (weighbridge operator and assistant engineer), they are able to explain the process of FFB handling including crop diversion within Kulim's group mill. Thus, the NCR is remain closed.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1692268-201809-M3	Clause & Category (Major / Minor)	Indicator 2.1.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	02/01/2019
Statement of Nonconformity:	Compliance to with relevant legal requirements has not effectively demonstrated		
Requirement Reference:	i)Evidence of compliance with relevant legal requirements shall be available. ii)Noise Exposure Regulation 1989, Regulation 27 - Part VII; Employee Information & Training iii) Employment Act 1955 (Act 265); PART VIII; Employment Of Women; 34. Prohibition of night work		
Objective Evidence:	<p>i)No hearing conservation programme planned for preventive measure as to date. 7 hearing impairment cases recorded in 2017 and 8 cases recorded in 2018. Refer to JKPP 7 dated 2/8/17 and 27/5/18.</p> <p>ii)Women employee (Employee # 000951854; Workstation: Weighbridge operator) work attendance (punch-card) records for the month of Aug 2018 shown</p>		

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	the women worker work exceeded 10pm at night on 5th, 6th, 20th and 21st. Punch-card records for month of Sep 2018 shown the same women worker work exceeded 10pm at night on 2nd, 3rd, 11th, 21st and 30th.
Corrective Actions:	<p>i) The same program will be included as OSHA listed training and shall be organized for respective OUs as annual OSHA training program.</p> <p>ii) The application for approval of permits were also submitted by all POMs. We were made to understand that DG Labour has decided that all blanket approvals granted to employers in Peninsular Malaysia for exemption from the provisions under section 24 and section 34 of the Employment Act 1955 are still valid, in force and continued to be applicable provided all conditions imposed thereof are complied with.</p> <p>Major NC close out verification: Hearing conservation programme carried out on 4/11/18 by external trainer was verified. Training module on Hearing Protection Device @ HPD and noise training has been covered as part of the said programme. Moving forward, hearing conservation training is included in the 2019 annual OSH training programme for Kulim (M) Berhad. Verified blanket exemption issued by from YBhg. Dato’ Mohd Jeffrey Bin Joakim, Director General of Labour based on letter Ref. BHG. PU/9/108/1(2) dated 1 June 2018. Thus, the non-conformity on prohibition of night work for women is dropped. However, internally, mill management has issued a memo dated 4/10/18 to advise working hours for women only up to 10 pm.</p>
Assessment Conclusion:	<p>ASA2_1 verification: For issue # (i), hearing conservation training been done 4 Nov 2018 by Muzaffar Salim (HQ/11/DOC/00/235) 14 person attended including person infect. OSH plan, already included Hearing conservation training will be conduct on November 2019. This plan approved on December 2019.</p> <p>For issue # (ii),</p> <ul style="list-style-type: none"> - Internal memo sent by Sindora Palm Oil Mill Manager dated 4 October 2018 informing of the prohibitions against women working between 10PM to 5AM effective immediately. - JTK issued a letter Ref: BHG PU/9/135 Jld 17 (13) dated 23 January 2019 signed by Ketua Pengarah Tenaga Kerja, Dato’ Mohd Jeffrey bin Joakim giving exemption under Section 34 Employment Act to Sindora Berhad, Sindora Palm Oil Mill, subject to conditions stipulated. - There is no evidence that any female worker worked between 10PM to 5AM at the Sindora Palm Oil Mill between the date of the last audit and the surveillance audit

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1692268-201809-N1	Clause & Category (Major / Minor)	Indicator 4.7.5 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	08/10/2019
Statement of Nonconformity:	Record of all accident has not periodically reviewed effectively.		
Requirement Reference:	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the		

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	appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.
Objective Evidence:	JKKP 8 report submitted dated 11 th January 2018 has not include 7 hearing impairment cases via JKKP 7 dated 2 August 2017 as per requirement of NADOPOD Reg. 10 (1)(b).
Corrective Actions:	Refresher Training on all JKKP forms will be conducted as part of OSHA Annual Briefing 2019.
Assessment Conclusion:	<p><u>ASA2 1 verification:</u> From the verification JKKP 8 dated 21/1/2019 JKKP8/29476/2018, 8 cases JKKP 7 been reported in JKKP 8. Audiometric test - 27 May 2018 have reported 8 cases of Hearing impairment</p> <p>Training regarding to NADOPOD been conduct by Romezam Bin Mohd Zain from DOSH and KSTS on 18 August 2019</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1692268-201809-N2	Clause & Category (Major / Minor)	Indicator 4.1.3 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	08/10/2019
Statement of Nonconformity:	Records of monitoring was not effectively maintained.		
Requirement Reference:	Records of monitoring and any actions taken shall be maintained and available, as appropriate.		
Objective Evidence:	EHS related records for working at height and confined space activities for; Boiler Furnace Staging/Scaffolding Erection: 7/5/17 AE health declaration record and monitoring mechanism for erected staging/scaffolding was not available		
Corrective Actions:	KSTS to provide SOP for the said activity to be communicated to all mills.		
Assessment Conclusion:	<p><u>ASA2 1 verification:</u> During ASA 2, verification on the SOP regarding to monitoring on erecting scaffolding procedure, management already establish new SOP dated 1 June 2019 under title ERECTING AND DISMANTLING SCAFFLOD. On 2 May 2019 was the latest monitoring record on Scaffolding was available. For Health declaration in latest PTW for boiler cleaning dated 13 April 2019 and 14 April 2019 was available.</p>		

Opportunity for Improvements	
OFI #	Description
Nil	

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1692268-201809-M1	Major	5.3.1	05/10/2018	Closed out on 02/01/2019
1692268-201809-M2	Major	5.4.2	05/10/2018	Closed out on 02/01/2019
1692268-201809-M3	Major	2.1.1	05/10/2018	Closed out on 02/01/2019
1692268-201809-N1	Minor	4.7.5	05/10/2018	Closed out on 08/10/2019
1692268-201809-N2	Minor	4.1.3	05/10/2018	Closed out on 08/10/2019
1831667-201906-M1	Major	SCCS E 5.1	10/10/2019	The NC is withdrawn

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

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

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

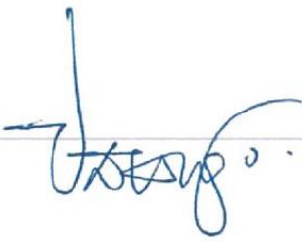

List of Stakeholders Contacted	
<p>Internal Stakeholders</p> <ul style="list-style-type: none"> Estates workers Mill workers NUPW representative Gender committee General workers 	<p>Union/Contractors/Local Communities</p> <ul style="list-style-type: none"> Kolam Udang Sahabat Sejati contractor Kedai Makan Kg Tanjung Serindit Representative of Kampung Tanjung Serindit Soko SK Enterprise Alias Conggo Enterprise Nilai Megah Sdn Bhd Teck Lee Sdn Bhd Kannan Enterprise

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Government Departments SJK(T) Ladang Sg Papan	NGO Nil
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IS #	Description
1	Feedbacks: Some contractors informed that they are not aware of the detailed terms and conditions of the contracts entered into with the estates because the contracts were prepared in English; a language they are not proficient in.
	Management Responses: Management noted the comments given by contractors and will look at ways to improve contractors' understanding of the detailed terms of the contract.
	Audit Team Findings: Contractors were not briefed of all the terms of the contracts. Only the following issues were briefed in detail: <ul style="list-style-type: none"> - Job scope - Duration of the contract Payment terms
2	Feedbacks: Some foreign workers informed the auditor that they prefer to keep their own passports to enable easy access to the nearest town for grocery shopping.
	Management Responses: All workers had already signed a revised employment contract which contains a clause that gives workers an option of either: <ul style="list-style-type: none"> a. To keep their own passports; b. To keep the passport at the office. The company only keeps passports of workers who have elected to keep the passports at the office.
	Audit Team Findings: It was verified that the workers interviewed had signed the revised employment contract and had chosen to keep their own passports at the office. Briefings were done by the Company prior to signing of the document. However, some workers may not have clearly understood the contents of the document they signed.

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Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Sindora Palm Oil Mill has complied with the RSPO P&C MY-NI 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 Sindora Palm Oil Mill is approved and continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Valence Shem	Name: Salasah Elias
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Kulim Malaysia Berhad
Title: Lead Auditor	Title: Deputy General Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 2/1/2020	Date: 14.01.2020

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	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 -	Information about environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. In the company's website (http://www.kulim.com.my/), documents such as OSH plan, HCV documents, negotiation procedure, complaint records, sustainability handbook and report, EIA, Management Plans & Continuous Improvement Plans were made publicly available. Other sensitive information such as land title and etc. can be provided upon request.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	All operating units continue to maintain records of information request and response. Request for information are attended promptly and this was also confirmed through interview with stakeholders.	Complied
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

Criterion / Indicator	Assessment Findings	Compliance
1.2.1 Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). - Major compliance –	There is an SPO Transparency Program under Kulim Malaysia Berhad. The procedure is to ensure that documents if to be released and made publicly are readily available. The Corporate Dept. will ensure that the following documents are available upon request and they do not affect the confidentiality or social outcomes. Among the documents that were made available for viewing are: <ul style="list-style-type: none"> - Land title (held as hard copy by the property department) - Health and safety plan - Plans and impact assessment- environmental & social - Pollution prevention plans - Details of complaints and grievances - Negotiation procedures - Continuous improvement plan - Biodiversity plans - Policy documents (sustainability handbook) In addition to the website, the policies were also displayed at various strategic locations at the operating units such as notice boards at the estates, mill office and muster ground for employees and visitors to view.	Complied
Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.		

Criterion / Indicator	Assessment Findings	Compliance
<p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>All Mill and Estates within the Sindora Complex subscribe to Kulim (Malaysia) Berhad Corporate Integrity Pledge signed by its Executive Director dated 15 November 2018. Additionally, there are also the following policies of Kulim (Malaysia) Berhad:</p> <ul style="list-style-type: none"> a. Ethics Policy; b. No Gift and Entertainment Policy; and c. Conflict of Interest Policy. <p>These Policies were signed by its Executive Director on 1 May 2018 and communicated to all levels of workforce during morning assemblies at Sindora Palm Oil Mill (3 June 2019 and on 4 January 2019), REM Estate (17 May 2019 and 5 July 2019), Sg Papan Estate (16 April 2019), Sindora Estate (15 September 2019).</p> <p>Interviews conducted with workers at the Mill and Estates confirmed their understanding of this ethical conduct and integrity requirements.</p>	<p>Complied</p>
<p>Principle 2: Compliance with applicable laws and regulations</p>		
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>		

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>Legal register covering the applicable local and international laws and regulations are available. Compliance to each applicable law and regulation is monitored by the operating units and head office sustainability team. Among licenses and permits verified at the visited operating units were:</p> <ul style="list-style-type: none"> - Permit to store diesel #J/KTG 000046, capacity 10,500 lt, valid until 24/3/2020, licensee: Mahamurni Plantations Sdn Bhd - Permit to store diesel #J/KTG 000059, capacity 10,000 lt, valid until 24/3/2020, licensee: Kulim (Malaysia) Bhd - MPOB License #570243002000, valid until 29/2/2020, Licensee: Mahamurni Plantations Sdn Bhd., Licensed area: 3,021.59 Ha - Permit to install electric fencing #ST(KAW/J)11/2/4(1/2014) - MPOB License #501259002000, valid until 31/3/2020, Licensee: Kulim (Malaysia) Bhd, Licensed area: 2,240.96 Ha - DOE's license for mill #004718, valid until 30/6/2020 <p>Closure of Major NCR raised in previous surveillance audit has been verified as follows:</p> <ul style="list-style-type: none"> - Internal memo sent by Sindora Palm Oil Mill Manager dated 4 October 2018 informing of the prohibitions against women working between 10PM to 5AM effective immediately. - JTK issued a letter Ref: BHG PU/9/135 Jld 17 (13) dated 23 January 2019 signed by Ketua Pengarah Tenaga Kerja, Dato' Mohd Jeffrey bin Joakim giving exemption under Section 34 Employment Act to Sindora Berhad, Sindora Palm Oil Mill, subject to conditions stipulated. - There is no evidence that any female worker worked between 10PM to 5AM at the Sindora Palm Oil Mill between the date of the last audit and the surveillance audit . <p>MPOB license 500263204000 valid until 30 June 2020 DOE license (Jadual pematuhan) 005343 valid until 30 June 2020 Diesel permit J038002 valid until 6 Jan 2020 JH PMD 2038 valid until 1 August 2020</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	PMT 118943 valid until 24 June 2020 Bakaj license Bakaj/334/300/05/07/08/16 <u>REM estate</u> MPOB license 501259002000 valid until 31/3/2020 Diesel permit KPDN kk.J.KTG/permit 0040(PD) valid until 20/4/2020 JH PMT 22741 valid until 16/9/2020 License for firearm no 280692 available for manager. Hospital Assistant certificate referred INSAN/LAT/132/2011.	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	Complied
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 2.2:			
The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			
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 -	The legal ownership for land use right basically can be seen through the possession of land titles. <u>Sg Papan</u> Total 17 titles, total area 2,995.85 Ha (original is 3,025.88 Ha), owner Mahamurni Plantations Sdn Bhd, land use condition – oil palm plantation. 30.03 Ha is returned to government for Petronas and TNB utilization. Kulim (M) Bhd is in the process of revising the land titles with the Land Department. <u>REM</u> Total 14 titles, total area 2,240.96 Ha, owner Kulim (M) Bhd, land use condition – oil palm plantation.	Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Sindora certification unit uses a few methods in demarcating its boundaries with adjacent neighbours i.e. boundary trenching and concrete pegs (4"x4"). At boundaries between Sungai Papan Estate and Kampung Muhibah & FELDA Sening Estate, between REM and Sin Nam Heng Estate, showed that the demarcation methods were well implemented.	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 -	As observed during the audit, there are no records of any dispute involving units within the Sindora Complex and any third parties. This was further confirmed during consultations with the local communities from Kg Tg Serindit and when reviewing minutes of stakeholder meetings at Sindora POM and Sindora Estate (15 September 2019), and Sg Papan Estate (22 August 2019). As such, there is no requirement for payment of any compensation to any third parties.	Complied

Criterion / Indicator		Assessment Findings	Compliance
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	As observed during the audit, there are no records of any dispute involving units within the Sindora Complex and any third parties. This was further confirmed during consultations with the local communities from Kg Tg Serindit and when reviewing minutes of stakeholder meetings at Sindora POM and Sindora Estate (15 September 2019), and Sg Papan Estate (22 August 2019).	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	As observed during the audit, there are no records of any dispute involving units within the Sindora Complex and any third parties. This was further confirmed during consultations with the local communities from Kg Tg Serindit and when reviewing minutes of stakeholder meetings at Sindora POM and Sindora Estate (15 September 2019), and Sg Papan Estate (22 August 2019). As such, there is no requirement for any participatory mapping with any affected parties.	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	As observed during the audit, there are no records of any dispute involving units within the Sindora Complex and any third parties. This was further confirmed during consultations with the local communities from Kg Tg Serindit and when reviewing minutes of stakeholder meetings at Sindora POM and Sindora Estate (15 September 2019), and Sg Papan Estate (22 August 2019). There is no evidence of any occurrence of any instigation of violence involving Sindora Complex.	Complied
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			

Criterion / Indicator	Assessment Findings	Compliance
2.3.1 Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	As observed during the audit, there are no records of any dispute involving units within the Sindora Complex and any third parties. This was further confirmed during consultations with the local communities from Kg Tg Serindit and when reviewing minutes of stakeholder meetings at Sindora POM and Sindora Estate (15 September 2019), and Sg Papan Estate (22 August 2019). As such, there is no requirement for any map showing extent of recognised legal, customary or user rights done in a participatory way with any affected parties.	Complied
2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities’ decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company’s title, concession or lease on the land. - Minor compliance -	As observed during the audit, there are no records of any dispute involving units within the Sindora Complex and any third parties. This was further confirmed during consultations with the local communities from Kg Tg Serindit and when reviewing minutes of stakeholder meetings at Sindora POM and Sindora Estate (15 September 2019), and Sg Papan Estate (22 August 2019). As such, no consultation and discussion had been held with any affected groups, no negotiated agreements detailing any FPIC process is available. And no negotiated agreements detailing any FPIC process is available.	Complied

Criterion / Indicator		Assessment Findings	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	As observed during the audit, there are no records of any dispute involving units within the Sindora Complex and any third parties. This was further confirmed during consultations with the local communities from Kg Tg Serindit and when reviewing minutes of stakeholder meetings at Sindora POM and Sindora Estate (15 September 2019), and Sg Papan Estate (22 August 2019). As such, no relevant information is available for any affected parties.	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	As observed during the audit, there are no records of any dispute involving units within the Sindora Complex and any third parties. This was further confirmed during consultations with the local communities from Kg Tg Serindit and when reviewing minutes of stakeholder meetings at Sindora POM and Sindora Estate (15 September 2019), and Sg Papan Estate (22 August 2019). As such, no evidence to show any communities being represented by their own representatives.	Complied
Principle 3: Commitment to long-term economic and financial viability			
Criterion 3.1:			
There is an implemented management plan that aims to achieve long-term economic and financial viability.			
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 -	Business management plan was available for 5 years, Sindora Palm Oil Mill (SPOM) and supply bases have established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Budget and 5 years management plan (projections 2020- 2025) was verified during the audit. Sindora Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year. Sample of CAPEX for 2019: In Sg Papan, increase budget because increase in mature area from 2477.50 ha to 2614.07 for P15 (136.57 ha). Increasing in Glyphosate price from RM8.10/Lt into RM 9.45/Lt, this cause budget from spraying increasing.	Complied

Criterion / Indicator		Assessment Findings			Compliance
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	The replanting programme was established. Sighted Replanting Programme 2019-2044:			Complied
		Estate	Year will be replanting	Hectare/field	
		Sg Papan	2028	Field P03 - 246.41 Ha	
		Sindora	2031	Field P06 – 212.72 Ha	
Principle 4: Use of appropriate best practices by growers and millers					
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.					

<p>4.1.1</p>	<p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>SPOM has revised and update its documentation in line with ISO 14001 and ISO 9001 transition. An Integrated Management Manual (SNPOM/QM/0), dated: 1/1/18 was reviewed and verified. For mill operation, SOP Core Process (SNPOM/SOP/8) issue:3, dated 1/1/18 has detailed out mill's core processes which covers for all mill's day to day operation. For example for mill SOPs; i) SNPOM/SOP/8.5, Sterilization Station ii) SNPOM/SOP/8.6, Threshing /Pressing & EFB Station iii) SNPOM/SOP/8.13, Water Treatment iv) SNPOM/SOP/8.14, Effluent Treatment Plant v)Sustainable Management System, Traceability, Doc. No: SQD/SMS/1.2 Date 1 July 2018 and SOP: CSPO Supply Chain Rev: 00 Procedure No: MKD/001 dated 08 February 2012.</p> <p>Work Instructions (WI) have been derived from SOPs and displayed at work stations at the mill and at pertinent locations at the estates, such as the Muster Notice Boards. i) SNPOM /WI/9, Operational control – Waste Management ii) SNPOM /WI/5, Control of black smoke emission iii) SNPOM /WI/28, Working at confined space iv) SNPOM /WI/27, Working at height place</p> <p>Work Instructions have been derived from SOPs and it were displayed at work stations at the mill and at certain locations at the estates, such as the Muster Notice Boards. Eg: SM/WI/10: Boiler Station, SM/WI/12: Power House, SM/WI/13: Laboratory Manual, SM/WI/22: Waste Management, SM/WI/23: Handling chemicals, SM/WI/25: Usage of hearing protection device, SM/WI/29: Emergency Response Procedure, SM/WI/30: Maintenance and servicing of oil trap, SM/WI/34: Confined Space Management, SOP Harvesting, SOP Spraying,SOP:Manuring, SOP: Workshop, SOP:</p> <p>Working at Height, SOP: Oxy-Acetylene Set, SOP: Welding, SOP:Mechanical Buffalo, and others.</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	Kulim (M) Berhad Agricultural Manual has established covers Replanting, roads drains Bridges culverts and fences, construction of estate building, manuring including POME and Bio compost, harvesting, pruning and ablation, soil conservation, justification of chemical use, weed management, integrated pest management and plant diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management including composting site operation.	

<p>4.1.2</p>	<p>A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p>	<p>Mechanism to check consistent implementation of procedure is through Internal Audit, Mill Inspector and Estate Inspector Visit. Internal Audit is planned twice a year by Sustainability Department, refer to internal audit carried out at specific operating units;</p> <table border="1" data-bbox="981 523 1854 852"> <thead> <tr> <th>Operating unit</th> <th>Audit Date</th> <th>Finding/ NC status</th> </tr> </thead> <tbody> <tr> <td>Sindora Mill</td> <td>29/9/2019</td> <td>Not update Hazard signage and oily floor. NCR already close verified during site verification.</td> </tr> <tr> <td>Sg Papan estate</td> <td>7&8 April 2019</td> <td>To remove green frond because frond snapping moderate in P07 & P08</td> </tr> <tr> <td>Sindora estate</td> <td>29 Sept 2019</td> <td>To update hazard pictogram for fire at Skid tank. All already been update accordingly</td> </tr> </tbody> </table> <p>Mill Inspectorate Visit for Sindora Palm Oil Mill (SPOM) was conducted on 26/9/2019 by Mill Inspectorate Office under Kulim Group of company. Refer to report, MJAB/SNPOM/5/2019.</p> <p>Plantation Inspectorate visit carried out for the latest financial year of 2019. Summary of PI visit rating:</p> <table border="1" data-bbox="981 1114 1868 1283"> <thead> <tr> <th>Estate</th> <th>Visit Date</th> <th>Overall Rating</th> </tr> </thead> <tbody> <tr> <td>Sg Papan</td> <td>7&8 April 2019</td> <td>86%</td> </tr> <tr> <td>REM</td> <td>14&17 March 2019</td> <td>84.5%</td> </tr> <tr> <td>Sindora</td> <td>23&26 September 2019</td> <td>87%</td> </tr> </tbody> </table> <p>In estate, agronomist also carried out the assessment and recommendation for manuring and other. Summary of Agronomist as per below:-</p>	Operating unit	Audit Date	Finding/ NC status	Sindora Mill	29/9/2019	Not update Hazard signage and oily floor. NCR already close verified during site verification.	Sg Papan estate	7&8 April 2019	To remove green frond because frond snapping moderate in P07 & P08	Sindora estate	29 Sept 2019	To update hazard pictogram for fire at Skid tank. All already been update accordingly	Estate	Visit Date	Overall Rating	Sg Papan	7&8 April 2019	86%	REM	14&17 March 2019	84.5%	Sindora	23&26 September 2019	87%	<p>Complied</p>
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Criterion / Indicator		Assessment Findings			Compliance
		Estate	Report	remarks	
		Sg Papan	No 1/2019	2018 ffb yield was reduce 4.84% from previous year. Highest yield recorded in P12 with production of 31.04 mt/ha.	
		REM	No 1/2019	Harvesting hectare was increased due to P16 (125.33ha) was commenced harvesting starting from Jan 2019.	
		Sindora	No 3/2019	Proper ablation programmes for the existing immature area and high suppling area.	
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	<p>Records of monitoring and any action taken were maintained. Refer related report under the above indicator 4.1.2. For EHS related monitoring records, permit to work has been implemented for internal and external works. Sample of working at height and confined space activities permit checked: Permit to work (contractor and internal workers)</p> <p>i)Furnace Staging Erection: 7/5/17 ii)Tube and mud drum cleaning: 11/5/18</p> <p>AE health declaration record and monitoring mechanism for erected staging/scaffolding was not available. Thus, a minor NC was raised on previous year.</p> <p>During ASA 2, verification on the SOP regarding to monitoring on erecting scaffolding procedure, management already establish new SOP dated 1 June 2019 under title ERECTING AND DISMATLING SCAFFLOD. On 2 May 2019 was the latest monitoring record on Scaffolding was available. For Health declaration in latest PTW for boiler cleaning dated 13 April 2019 and 14 April 2019 was available. This Minor NC was remain close as per verification.</p>			Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Records of the origins of all third-party sourced FFB were verified. Summary of FFB received based on weighbridge record as at to date checked. There were total of 6 OCP registered under Sindora POM for 3rd party FFB suppliers. No Changes as per previous surveillances.	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Kulim (M) Berhad Agriculture Manual has established covers Replanting, roads drains Bridges culverts and fences, construction of estate building, manuring, harvesting, pruning and ablation, soil conservation, justification of chemical use, weed management, integrated pest management and plant diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management. The related SOP, namely Leaf and Soil Sampling Notes procedure was sighted. New revised Agriculture Manual dated 31/10/17 was sighted under A07-02-Planting Terrace and A20 – Standard Operating Guidelines For Conversion of Oil Crop Other Than Oil Palm To Oil. All estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices consistently monitored by estate operation management and estate inspectorate. The recommendations for improvements are given to maintain the sustainable practices.	Complied

Criterion / Indicator		Assessment Findings	Compliance												
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	<p>Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators.</p> <p>Sg Papan Estate Agronomist report by Agronomy Advisory & Service department dated 2 Jan 2019, fertilizer recommendation 2019 was done by agronomist :</p> <ol style="list-style-type: none"> 1. AS: 2.50Mt 2. HGFB: 0.10 mt 3. MOP: 1.75 mt 4. MIX2+ B: 2.50 mt <p>The latest application (2nd programme) was carried out at P03/01 for MIX1 (2.00 kg/palm) and has been completed on 19/8/19.</p>	Complied												
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>Foliar and soil sampling was carried out by Internal Agronomist from Agronomy Advisory and Services Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conduct for every year while for soil analysis, the frequency for soil sampling is conducted at 5 years intervals (Leaf and Soil Sampling Notes Procedure-Kulim (M) Bhd). Analysis reports were summarized as per below:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Foliar Analysis (yearly)</th> <th>Soil Sampling (5 yearly)</th> </tr> </thead> <tbody> <tr> <td>Sg Papan</td> <td>LI/1810/SP/1281-1290 dated 10/10/2018</td> <td>SI/1809/0221-0224 dated 16/08/2018</td> </tr> <tr> <td>REM</td> <td>LI/1901/REM/1868-1874 dated 10 Jan 2019</td> <td>SI/1901/0001-0004 dated 1 Jan 2019</td> </tr> <tr> <td>Sindora</td> <td>LI/1812/SIN/1652-1661 dated 14/12/2018</td> <td>SI/1812/0306-0309 Dated 25 Nov 2019</td> </tr> </tbody> </table>	Estate	Foliar Analysis (yearly)	Soil Sampling (5 yearly)	Sg Papan	LI/1810/SP/1281-1290 dated 10/10/2018	SI/1809/0221-0224 dated 16/08/2018	REM	LI/1901/REM/1868-1874 dated 10 Jan 2019	SI/1901/0001-0004 dated 1 Jan 2019	Sindora	LI/1812/SIN/1652-1661 dated 14/12/2018	SI/1812/0306-0309 Dated 25 Nov 2019	Complied
Estate	Foliar Analysis (yearly)	Soil Sampling (5 yearly)													
Sg Papan	LI/1810/SP/1281-1290 dated 10/10/2018	SI/1809/0221-0224 dated 16/08/2018													
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Sindora	LI/1812/SIN/1652-1661 dated 14/12/2018	SI/1812/0306-0309 Dated 25 Nov 2019													

Criterion / Indicator	Assessment Findings	Compliance	
4.2.4	<p>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.</p> <p>- Minor compliance -</p>	<p>POME and composting were applied as per agricultural manual:</p> <ol style="list-style-type: none"> 1. D05: EFB Utilization at rate 50mt/ha. 2. D08: Bio-compost application at the rate of 7mt/ha or 50kg/palm on selected area. <p>In Sungai Papan Estate, no using EFB. For Sindora last implementation of EFB was on 19 August 2019 at P10/06 (Total: 79.94MT) and P11(Total: 17.43 MT).</p>	<p>Complied</p>
<p>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</p>			
4.3.1	<p>Maps of any fragile soils shall be available.</p> <p>- Major compliance -</p>	<p>Sg Papan, soil map was available there are 10 type of Soil in Sg Papan estate. Soil type was Aluvium Complex, Batu Lapan Series, Bungor Series, Holyrood Series, Keranji Series, Lanchang Series, Pelepah Series, Renggam Series, Sabrang Seies, and Tai Tak Series and major soil type series in Sg papan was Siri Bungor soil analysis.</p>	<p>Complied</p>
4.3.2	<p>A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).</p> <p>- Minor compliance -</p>	<p>Sighted slope map (Slope Classification Map). Slope area constructed with terrace and stop bund. Planting terraces had been constructed where slope >7°. Fields are established with cover crops such as mucunna and others.</p>	<p>Complied</p>
4.3.3	<p>A road maintenance programme shall be in place.</p> <p>- Minor compliance -</p>	<p>Estates has implemented annual road and bridges programme. Example of programme checked at Sindora and Sg Papan estates shows the file road programme indicating road repairs and maintenance for the whole estate roads includes grading, compacting and to strengthen the road surface with crusher run. Latest record was on July 2019 actual been done in Field P09 with total 173.17 ha.</p>	<p>Complied</p>
4.3.4	<p>Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.</p> <p>- Minor compliance -</p>	<p>No peat soil in all estate</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	No peat soil in all 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 -	No peat soil in all estate	Complied
Criterion 4.4:			
Practices maintain the quality and availability of surface and ground water.			
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	Generally, the mill and the estates have their water management plans. As an example at Sungai Papan Estate, water management plan was available which was last reviewed on 1/8/2018. The plan is mainly focusing on minimizing pollution to surface water resource such as pond & river and efficient consumption of water especially during draught season. Pollution is reduced through restriction of agrochemicals application at buffer zones and desilting of drains. Among the actions plan to be implemented during draught season are: - to schedule water supply to avoid overuse of water at nursery, housing, etc. - to provide containers to every house for storing water	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	A procedure (entitled Protection of Natural Water Courses, updated on 1/11/2018) for maintaining buffer zone was available where agrochemical application for field maintenance is not allowed within the buffer zone. At Sungai Papan Estate, river buffer zone located at 1°31'44"N 104°9'45"E (Sungai Petai) was visited. It was noted that the demarcation of the zone was available using 4"x4: concrete pegs painted with blue & white stripe with 5 m width. Analysis of incoming and outgoing water is done on monthly basis. Samples were sent to third party laboratory (SAMB #307) for testing. Two parameters tested for quality observed, i.e. Phosphate and Nitrate Nitrogen. Last report is dated 29/8/2019 (report no.: WI/1909/1164-1165).	Complied
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	The mill applies the biological system with multiple ponds in series for its treatment of effluent. Based on DOE's license, the mill is only allowed to discharge its effluent to land irrigation and compost plant. However, at the moment, the compost plant operation has been stopped since March 2019. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Latest 12 months (Jul 2018 to Jun 2019) results were verified where highest BOD = 83 ppm while lowest = 15 ppm were recorded. The results complied with the regulated requirement i.e. 100 ppm.	Complied
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which recorded on daily basis. Water for processing is obtained from water catchment pond. An average of 0.77 m ³ /mt FFB in 2018 and 0.90 m ³ /mt FFB as at Sep 2019 water was used for FFB processing recorded.	Complied
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.			

Criterion / Indicator		Assessment Findings	Compliance												
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	IPM Manual includes the planting of beneficial plants and control of damage by rodents, leaf-eaters, orytes and natural enemies. Beneficial plants such as Turnera subulata, Antigonon Leptopus and Cassia Cobanensis are grown in the estates. Records of planting of new areas and maintenance of existing areas of beneficial plants, location maps and barn owl census are available. Sg Papan, beneficial plant to plant 40 plot in Aug 2019, 10 plot in May 2019. Guatamala 9 plot in July at Sungai Petai.	Complied												
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	IPM training done on 25 April 2019 by Zainuriah Binti Abdullah (Head of Plantation Advisory & Services Division). The record of Barn Owl census been done dated 20 August 2019, from the record occupancy rate was 31% for REM Div and 24% for Pasak. There are total 54 BOB in REM estate. Training for BOB census been done on 4 March 2019.	Complied												
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment															
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Justification of pesticides applied is available in the agriculture manual. Refer to agriculture manual 31/10/2017, H01: Justification of Chemical Use. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species.	Complied												
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained <table border="1" data-bbox="981 1157 1816 1388"> <thead> <tr> <th>Estate</th> <th>Application Hectarage</th> <th>AI/Ha</th> </tr> </thead> <tbody> <tr> <td>REM estate</td> <td>1865.11</td> <td>0.186</td> </tr> <tr> <td>Sindora estate</td> <td>3655.04</td> <td>0.180</td> </tr> <tr> <td>Sg Papan estate</td> <td>2835.19</td> <td>0.081</td> </tr> </tbody> </table>	Estate	Application Hectarage	AI/Ha	REM estate	1865.11	0.186	Sindora estate	3655.04	0.180	Sg Papan estate	2835.19	0.081	Complied
Estate	Application Hectarage	AI/Ha													
REM estate	1865.11	0.186													
Sindora estate	3655.04	0.180													
Sg Papan estate	2835.19	0.081													

Criterion / Indicator		Assessment Findings	Compliance
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Kulim’s Agriculture Manual. The implementation in the field is consistent with the manual. There is no prophylactic use of pesticides.	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 -	Kulim (M) Bhd has stopped paraquat usage since February 2015. Alternatives such as Glyphosate were used. The implementation in the field is consistent with the SOP. No Changes from the previous audit. No record Pesticide class I in REM estate, Sindora estate.	Complied

Criterion / Indicator	Assessment Findings	Compliance																			
<p>4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -</p>	<p>The suitable personal protective equipment's and application equipment provided to the operators. Pesticide operators given training on the safe handling and application of the pesticides. All precautions attached to the products explained using SDS to operators and understood by them. This was noted during the interview with workers. From the interview as per below verification training that been attended:-</p> <table border="1" data-bbox="981 603 1832 1104"> <thead> <tr> <th data-bbox="981 603 1137 651">Id Workers</th> <th data-bbox="1137 603 1422 651">Training attend</th> <th data-bbox="1422 603 1646 651">Date</th> <th data-bbox="1646 603 1832 651">Estate</th> </tr> </thead> <tbody> <tr> <td data-bbox="981 651 1137 699">603700</td> <td data-bbox="1137 651 1422 699" rowspan="4">Spraying Technique Training by G - Planter.</td> <td data-bbox="1422 651 1646 699" rowspan="4">11 March 2019 (Sprayer)</td> <td data-bbox="1646 651 1832 699" rowspan="4">REM</td> </tr> <tr> <td data-bbox="981 699 1137 746">603738</td> </tr> <tr> <td data-bbox="981 746 1137 794">603849</td> </tr> <tr> <td data-bbox="981 794 1137 842">603767</td> </tr> <tr> <td data-bbox="981 842 1137 890">680089</td> <td data-bbox="1137 842 1422 890" rowspan="5">Spraying calibration & Spraying technique</td> <td data-bbox="1422 842 1646 890" rowspan="5">5 March 2019 (Sprayer)</td> <td data-bbox="1646 842 1832 890" rowspan="5">Sindora</td> </tr> <tr> <td data-bbox="981 890 1137 938">680102</td> </tr> <tr> <td data-bbox="981 938 1137 986">680478</td> </tr> <tr> <td data-bbox="981 986 1137 1034">860539</td> </tr> <tr> <td data-bbox="981 1034 1137 1104">680540</td> </tr> </tbody> </table>	Id Workers	Training attend	Date	Estate	603700	Spraying Technique Training by G - Planter.	11 March 2019 (Sprayer)	REM	603738	603849	603767	680089	Spraying calibration & Spraying technique	5 March 2019 (Sprayer)	Sindora	680102	680478	860539	680540	<p>Complied</p>
Id Workers	Training attend	Date	Estate																		
603700	Spraying Technique Training by G - Planter.	11 March 2019 (Sprayer)	REM																		
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<p>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 -</p>	<p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. SOP triple rinsing is available dated 18 May 2018 under Title Panduan Kerja Selamat Dibawah Akta Keselamatan Dan Kesehatan Pekerjaan 1994. Pesticide SOP 2nd Issue – Dec 2016 from SPO team ref no: SSD/ADMIN/002/17 under practice section stated All pesticide are to be kept in pesticide store.</p>	<p>Complied</p>																			

Criterion / Indicator	Assessment Findings	Compliance	
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 Agriculture Manual, Section I: Weeds Management. The implementation in the field is consistent with the Agriculture Manual. The hazard already been assess in HIRARC ad action plan was available. During interview in P14/01 with Spraying all PPE been using such as Apron, 3M respirator, Safety Shoes and Safety goggles, verified with PPE issuance dated 3 October 2019 (Id workers: 603700, 603738, 603849 & 603767).	Complied
4.6.8	Pesticides shall be applied aurally 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 all 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 Sindora Certification Unit. Employees handling pesticide given knowledge and skill required to cover safe handling practices and standard operating procedures.	Complied
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Disposal methods of all the identified wastes have been addressed in Sindora’s established procedures. Based on the site visit, it was observed that the practice to reduce, reuse and recycle of materials has been implemented throughout the company within mill and estates. Interview with the employees showed that they have a good understanding on wastes disposal.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.6.11	<p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.</p> <p>- Major compliance -</p>	<p>In Sg Papan, medical surveillance been done yearly. Report dated 15 July 2018 by Dr Muhammad Sayuthi Bin Zakaria (HQ/17/DOC/00/00053) from Mobile OHD Services attended by 70 workers (spraying, manuring, Foreman, Storekeeper and others). All fit to work.</p> <p>In REM, medical surveillance (HQ/17/DOC/00/00053) been done by Kulim Safety Training And Services Sdn Bhd. Attended by 51 workers and all workers were fit to work with chemical.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	No women chemical handler in Sg Papan estate, Sindora estate and REM estate. Verification by site visit and interview.	Complied
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			

<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>The established Occupational Safety & Health (OSH) Policy was sighted displayed at all Operating Unit offices visited. The policy was signed by the Executive Director of Kulim (Malaysia) Berhad on 1 May 2018. It is available in Bahasa Malaysia and English language. The health and safety plan documented and implemented, among others, include establishing OSH Committee and the functioning of the Committee; establishing of OSH objectives and monitoring of Safety Performance Scoreboard; all operations being risk assessed and control as per established SOP; establishing OSH Legal and Other Requirement Register and evaluation of its compliance; Chemical Health and Risk Assessment; Annual Audiometric test; Workplace accident notification, investigation and reporting; Posting of Protective Personal Equipment (PPE), Electrical Danger Signages and simplified SOP at work stations.</p> <p>i) Chemical registered for Mill – Dosh Registration : JK 7234 dated 28 Jan 2019. No New chemical in Sindora Mill.</p> <p>ii) CHRA for Mill – report No. JKPP HQ/03/ASS/00/154-2018/056 prepared by HJH. Noormahani Harun from QMSPRO Sdn Bhd. Date assessment : 26 March 2018 – 13 August 2018</p> <p>iii) Chemical exposure monitoring for N-Hexane (TWA: 50ppm, 176mg/m3), the personal chemical exposure monitoring done on 17 April 2019, report no: HQ/17/JHI/00/00008-2019/033 by Kulim Safety Training And Services Sdn Bhd. The result as per below:-</p> <table border="1" data-bbox="981 1107 1868 1337"> <thead> <tr> <th>Work unit</th> <th>Employee id</th> <th>Parameter</th> <th>Airbone concentration (mg/m3)</th> <th>DOSH PEL (mg/m3)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Laboratory</td> <td>623173</td> <td rowspan="3">n-Hexane</td> <td>ND</td> <td rowspan="3">176.00</td> </tr> <tr> <td>951991</td> <td>2.065</td> </tr> <tr> <td>951169</td> <td>0.769</td> </tr> </tbody> </table>	Work unit	Employee id	Parameter	Airbone concentration (mg/m3)	DOSH PEL (mg/m3)	Laboratory	623173	n-Hexane	ND	176.00	951991	2.065	951169	0.769	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> iv) Audiometric test been done yearly dated 12 May 2019 at Klinik Falck Bestari, from the result total 56 worekrs was attend, 8 person found as hearing impairment and 3 STS. STS been send on 22 July 2019 v) LEV done yearly as per recommendation latest dated 10 June 2019 report referred HQ/17/JHII/00/00004-2019/035 by Amcen Lab Sdn Bhd. Monthly done by lab itself latest was on October 2019 <p>In estate, Management already establish procedure for Safety (Panduan Kerja Selamat) dated 18 May 2009. This manual including Guidelines working safe in plantation and working safe in Mill.</p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>- Major compliance -</p>	<p>In Sindora Mill HIRARC already been reviewed dated 25 Sept 2019.</p> <p>In Sg Papan, HIRARC already reviewed for all accident dated 15 August 2019, for prevention they conduct the training 18 August 2018 and evaluate to ensure the workers was understand and aware regarding to harvesting procedure.</p> <p>For Chemical Hazard Risk Assessment (CHRA) in REM estate, latest done on 26 February 2018. Report no referred JKPP HQ/03/ASS/00/154-2018/029 prepared by QMSPRO Sdn Bhd.</p> <p>HIRARC already been reviewed on 11 Jan 2018 for accident happen 4 Jan 2018. As per action plan as per mitigation regarding to accident, estate already conduct the training on 11 Jan 2018. This HIRARC was cover all operation including Nursery, linesite and others with total 23 activities.</p> <p>In Sindora, the HIRARC already been reviewed dated 28 Sept 2019 based on latest record of JKPP 6 dated 29 August 2019. From the action plan, management already conduct the training regarding harvesting dated 29 Sept 2019. Based on the training management already conducted the evaluation to the workers understanding dated 29/9/2019.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance						
4.7.3	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -	<p>Trainings were provided during musters and also in session held in the estate community hall/mill compound. The following trainings made for the employees were recorded as follows referred sampling in indicator 4.8.2. Subjects extracted were mainly related to ESH, SOPs, and pesticide handlings. No changes from the previous surveillance.</p> <p>Verification on PPE for Sindora estate workers:-</p> <table border="1"> <thead> <tr> <th>Date</th> <th>PPE type</th> <th>Workers id.</th> </tr> </thead> <tbody> <tr> <td>3 Sept 2019</td> <td>Filter, Respirator, Apron, Goggle, Glove, Rubber Boot.</td> <td>680089, 680102, 680478</td> </tr> </tbody> </table>	Date	PPE type	Workers id.	3 Sept 2019	Filter, Respirator, Apron, Goggle, Glove, Rubber Boot.	680089, 680102, 680478	Complied
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Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.4</p>	<p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p> <p>The responsible persons are the Manager, Assistant Manager & SHEO of the respective operating units. JKPP meeting members consist of employer & employee representatives. Records of regular meetings between the responsible person and workers were maintained.</p> <p>Sg Papan estate, meeting done periodically (3month once) latest record was 25 Sept 2019 (report no : LSP/JKPP/03/2019). Previously record was on 22 August 2019.</p> <p>In REM estate, OSH committee appointment letter was available dated 1 Jan 2019 for En Mohd Raslam as Secretary . For OSH meeting latest conducted was on 15 August 2019, previously record was on 9 May 2019 and 10 Feb 2019.</p>	<p>Complied</p>

<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p>	<p>The management continued to maintained Emergency Response procedure, dated 23/8/2011 . The procedure was communicated accordingly to all workers. Fire drill been conducted on yearly basis, which the last was conducted on 17/7/2019 . ERP organization chart, assembly area and location of fire extinguishers and contact numbers available and displayed at relevant locations. First aid equipment available at worksites e.g. at Sterilizer station, Boiler Station.</p> <table border="1" data-bbox="978 619 1832 1364"> <thead> <tr> <th>Operating unit</th> <th>JKKP 8 or JKKP 6</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Sindora Mill</td> <td>JKKP 8 dated 27 Jan 2019 1 cases JKKP 6 dated 16 May 2019</td> <td>MC with total 15 days</td> </tr> <tr> <td>Sg Papan Estate</td> <td>JKKP 8 dated 23 Jan 2019 1 Cases JKKP 6 dated 21 May 2019</td> <td>4 cases recorded (2 without JKKP 6 and 2 with JKKP 6) Id workers 626082 Accident happen in P03/03, MC 5 days.</td> </tr> <tr> <td>REM estate</td> <td>JKKP 8 dated 3 Jan 2019 No JKKP 6 for 2019 todate</td> <td>1 JKKP 6 cases recorded (4 Jan 2018)</td> </tr> <tr> <td>Sindora Estate</td> <td>JKKP 8 dated 31 Jan 2019. 2 JKKP 6 for 2019 dated 9 April 2019 and 29 August 2019</td> <td>46 Cases accident and incident happen in estate including 4 cases on JKKP 6. 1 Fatality cases on April and still on investigation with DOSH. Latest DOSH</td> </tr> </tbody> </table>	Operating unit	JKKP 8 or JKKP 6	Remarks	Sindora Mill	JKKP 8 dated 27 Jan 2019 1 cases JKKP 6 dated 16 May 2019	MC with total 15 days	Sg Papan Estate	JKKP 8 dated 23 Jan 2019 1 Cases JKKP 6 dated 21 May 2019	4 cases recorded (2 without JKKP 6 and 2 with JKKP 6) Id workers 626082 Accident happen in P03/03, MC 5 days.	REM estate	JKKP 8 dated 3 Jan 2019 No JKKP 6 for 2019 todate	1 JKKP 6 cases recorded (4 Jan 2018)	Sindora Estate	JKKP 8 dated 31 Jan 2019. 2 JKKP 6 for 2019 dated 9 April 2019 and 29 August 2019	46 Cases accident and incident happen in estate including 4 cases on JKKP 6. 1 Fatality cases on April and still on investigation with DOSH. Latest DOSH	<p>Complied</p>
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Criterion / Indicator		Assessment Findings		Compliance
			NOI (No Siries; 3A 134376) dated 10 April and already close on 16 April 2019 as per NOI record.	
		WPI was done on 22 August 2019, its cover pesticide mixing area, clinic medical waste, pesticide store, Diesel engine and others. The workplace inspection will be done a day before OSH meeting will take place.		

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<p>4.7.6</p>	<p>All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p>	<p>All workers provided with medical care, and covered by accident insurance. Sample insurance policies checked:</p> <table border="1"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Mill/estate</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>SOCSO</td> <td>Sept 2019</td> <td>Sindora POM</td> <td>ID No: Foreigner: 623141,623165,623163</td> </tr> <tr> <td>FWCS (JB-09867905-FWC)</td> <td>7/9/2022-15/11/2019</td> <td>Sindora POM</td> <td>ID No: 623188, 623189,623190</td> </tr> <tr> <td>SOCSO</td> <td>August 2019</td> <td>Sg Papan Estate</td> <td>ID No: Malaysian; 625052,625010,650953 Foreigner; 625901,626243,626217</td> </tr> <tr> <td>FWCS (18DHQEBFE 4003941)</td> <td>Berjaya Sompo Insurance berhad 1/10/2018 – 31/3/2020</td> <td>Sg Papan Estate</td> <td>ID No: 626136,626278,625970</td> </tr> <tr> <td>SOCSO</td> <td>Sept 2019</td> <td>Sindora estate</td> <td>ID No;- Malaysian:- 680489, 650273, 680691, 680680</td> </tr> </tbody> </table>	Insurance	Period	Mill/estate	Remarks	SOCSO	Sept 2019	Sindora POM	ID No: Foreigner: 623141,623165,623163	FWCS (JB-09867905-FWC)	7/9/2022-15/11/2019	Sindora POM	ID No: 623188, 623189,623190	SOCSO	August 2019	Sg Papan Estate	ID No: Malaysian; 625052,625010,650953 Foreigner; 625901,626243,626217	FWCS (18DHQEBFE 4003941)	Berjaya Sompo Insurance berhad 1/10/2018 – 31/3/2020	Sg Papan Estate	ID No: 626136,626278,625970	SOCSO	Sept 2019	Sindora estate	ID No;- Malaysian:- 680489, 650273, 680691, 680680	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance
					Foreigner:- 680653, 680634, 680377, 680706	
		FWCS (18DHQEW CM00027)	Berjaya Somp Insurance Berhad	Sindora estate	ID No;- 680524	
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	Records of incident and accident are available, using internal reporting. All records on Lost Time Accident (LTA) metrics are updated and maintained accordingly as per below:-				Complied
		Year	Sindora mill	Sg Papan Estate	REM estate	Sindora estate
		2018	75.47	12.74	4.98	109.72
Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.						
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 -	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. Training programme planned for year 2018 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 - manurers				Complied

Criterion / Indicator		Assessment Findings	Compliance																											
4.8.2	Records of training for each employee shall be maintained. - Minor compliance -	<p>Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement. Samples of training record for 2018 as follows:</p> <table border="1"> <thead> <tr> <th>Training Type</th> <th>Date of Training</th> <th>Venue</th> </tr> </thead> <tbody> <tr> <td>Manuring – manual application</td> <td>12/09/2019</td> <td rowspan="6">Sg Papan</td> </tr> <tr> <td>Harvesting training</td> <td>19/09/2019</td> </tr> <tr> <td>Spraying training</td> <td>18/07/2019</td> </tr> <tr> <td>Spill kit Training</td> <td>4/7/2019</td> </tr> <tr> <td>First aid training</td> <td>18/4/2019</td> </tr> <tr> <td>Fogging</td> <td>14/4/2019</td> </tr> <tr> <td>Buffer zone training</td> <td>10/9/2019</td> <td rowspan="5">REM estate</td> </tr> <tr> <td>Chemical Handling</td> <td>15/9/2019</td> </tr> <tr> <td>PCD cleaning Training</td> <td>12/1/2019</td> </tr> <tr> <td>ERP training</td> <td>15/9/2019</td> </tr> <tr> <td>Replanting training</td> <td>1/7/2019</td> </tr> </tbody> </table>	Training Type	Date of Training	Venue	Manuring – manual application	12/09/2019	Sg Papan	Harvesting training	19/09/2019	Spraying training	18/07/2019	Spill kit Training	4/7/2019	First aid training	18/4/2019	Fogging	14/4/2019	Buffer zone training	10/9/2019	REM estate	Chemical Handling	15/9/2019	PCD cleaning Training	12/1/2019	ERP training	15/9/2019	Replanting training	1/7/2019	Complied
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<p>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</p> <p>Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>																														

Criterion / Indicator		Assessment Findings	Compliance
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	Assessments of environmental aspects and impacts conducted internally according to an established guideline. The assessment outcome were documented in Environmental Risk Assessment form [EPA-SINPOM-2017, rev. 1/2019]. The assessment had covered all of the estates and mill activities which included harvesting & evacuation, field upkeep, chemical storage, CPO storage, POME treatment, workshops, power generation, etc. Among the environmental impact considered were depletion of natural resources, global warming, air pollution, water pollution, land contamination and community impacts. The assessment also identified the type of wastes generated from the activities. The identified wastes can be generalised to toxic (scheduled) wastes, recyclable wastes and organic wastes.	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 -	The mitigation measures established based on aspect & impact evaluation and there is a column in the EPA-SINPOM-2017 form to document this under "risk control". Apart from that , environmental management programme has also been established: <ul style="list-style-type: none"> • Reduce 5% noise level at boiler station, engine room and kernel plant – to engage noise monitoring consultant to identify noise level • To control diesel consumption less than 0.60 lt/mt FFB processed – to running turbine for non-processing hours use excess fibre, to maintain FFB processed as budgeted to reduce generator set usage by adding more FFB supplier, maximum running gas engine and prevent air pollution by controlling boiler smoke emission – to ensure operation consistent running 2 press with throughput >38-40 mt, to ensure air pollution control system is working well 	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.1.3	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p>An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts.</p>	<p>Complied</p>
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>			

Criterion / Indicator	Assessment Findings	Compliance
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). - Major compliance -</p> <p>Information in High Conservation Value (HCV) assessment includes both the planted area itself and relevant wider landscape-level with considerations of surrounding areas. Initial HCV assessment was conducted in 2007 by an external consultant and is reviewed annually to ensure management and monitoring plans are still relevant and implemented. In April 2016, another HCV Assessment was conducted by Malaysia Environmental Consultant Sdn Bhd. Both lead assessors were ALS licensed assessor (ALS14023KL; ALS15035TN). Within the Sindora estate, following HCV were identified:</p> <ul style="list-style-type: none"> i) Biodiversity HCV 1 and HCV 2. The main concern is elephant using the forest inside and outside the estate. ii) Biodiversity HCV 1. Wildlife corridor along Sg Sembrong iii) Biodiversity HCV 3. Monitor species presence and maintain buffer with natural forest iv) Stream management HCV 4. Natural bank vegetation should be allowed to regenerate v) Soil and nutrient conservation on hill slopes. HCV4 <p>The estate’s boundary shares with the Kluang Forest Reserve, and the overlapping Gunung Belumut Wildlife Reserve. It also supports a viable subpopulation of the elephant. Within the Sindora estate, there is a forest reserve which is belonged to BAKAJ (Water Regulatory Body in Johore) connected between this foraging area and the rest of the Kluang Forest Reserve. It also serves as the wildlife corridor from east to west within the estate.</p> <p>For Sg Papan Estate, a baseline HCV report entitled Rapid Biodiversity Assessment dated July 10, 2008 was referred to. Based on the report, a total 51.37 ha of HCV was identified to be present within estate area.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>Based on the April 2016 HCV Assessment Report of Sindora Estate, total 77 species were recorded, two (2) are listed as critical (CR), three (3) endangered species (EN), two (2) vulnerable (VU) species, four (4) near threatened (NT) species. The remaining 66 species are classed as Least Concerned (LC).</p> <p>The management plan was developed based on recommendation of HCV assessment report. Action plan such as expand the narrowest section along the wildlife corridor. Total 2 narrowest section in blocks P87/01- 42 m and blocks P87/03- <40M has been expanded to total 160m and 200m respectively. During onsite visit [2°0'3"N 103°29'52"E], electric fencing has already been removed from the connecting road to allow unhindered passage for elephants moving east-west along the river corridor.</p> <p>For REM estate, Rapid Biodiversity Assessment Fact Sheet dated 5th September was referred to. Mammal (Long Tailed Macaque) under schedule II was identified. Other birds such as (common kingfisher, black-winged kite, crested serpent eagle were among protected birds under schedule III.</p> <p>HCV management plan developed for Sg Papan, REM and Sindora Estate which among others include boundary survey, bird survey, encroachment control, erosion control, restoration of natural vegetation, buffer zone establishment and elephant monitoring to name a few.</p>	<p>Complied</p>
<p>5.2.3 There shall b 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>Various training program had been conducted to enhance the awareness of the worker on HCV and human-wildlife conflict. All the visited estates have maintained their training records for verification e.g. at Sindora Estate, education programme with regards disciplinary measures in accordance with national law to the workers have been done through training (17/9/2019) and morning muster (2/4/2018). Interview the workers confirmed that they were aware for the conservation of the wildlife.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
5.2.4	Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	Management plan is incorporated with ongoing monitoring of the status of HCV and RTE species that are affected by plantation or mill operations and reported by the Kulim SPO Team from Head Office. Records of monitoring were available for verification.	Complied
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	No HCV with existing rights of local communities was identified that needs to be set aside.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The identification of wastes was done through the method mentioned in 5.1.1. Plans to manage the wastes were then established and implemented.	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	At Sindora Mill, empty contaminated containers were stored and disposed as scheduled waste. For the estates, the empty chemical containers were disposed through reputable collector after undergone the triple rinsing procedure. Receipts of collection signed by both management and collectors (drivers) were well maintained. Only Sindora Estate is disposing its empty chemical containers through scheduled wastes regulations. Scheduled wastes were disposed in accordance to EQ (SW) Reg., 2005 where authorised vendors were assigned to collect the SW from the premises. Consignment notes were available for verification e.g. Sindora POM: 2019092208KP9TC0 (SW309), 2019092208F8MH7N (SW306), 2019092208H07JT3 (SW410) and 2019092208UG697 (SW429) REM Estate: 2019090711UO2D30 (SW305), 20190907121DQOC (SW307), 2019090712703KDS (SW410), 2019090712NI97X1 (SW408) and 2019090712NY4PRZ (SW404) Sindora: 20190212156VISBQ (SW409), 2019021216EF3V46 (SW110), 20190212163AZW1R (SW307), 2019021216OINV8F (SW305), 2019021216A2VEWO (SW408) and 2019021216NVOCKS (SW410)	Complied
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	The estates and mill have also their programme for recycling. Among the wastes material identified that can be recycled were plastic, glass, paper and scrap iron. Ticket #188618, 187195, 187123, 186770 and 186728 at REM's "Buku Kitar Semula" and ticket # 0832 (10/11/2018), 0845 (9/3/2019) 0857 (20/7/2019) at Sindora Estate were verified. Domestic wastes from household were collected and landfilled. The landfill locations were appropriately selected in such a way that they are far from residential area and water ways.	Complied
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.			

Criterion / Indicator		Assessment Findings	Compliance
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	Diesel and petrol are the main fossil fuel consumed by the certification unit. Among the programme for improving the efficiency of fossil fuel consumption are: - Regular maintenance of vehicles and machinery and trainings for drivers & operators (ref.: pollution & emission management plan) - Utilisation of methane gas for electricity generation -	Complied
Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	Based on site visit at REM and Sindora estates, their preparation of land for replanting was done in accordance to Kulim's Agricultural Manual (Chapter A04 – Felling) i.e. palm trunks must be fell, chipped and shredded into slices of certain thickness. There was no trace of burning observed.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	NA as no fire was used to prepare land for replanting.	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	The assessment of polluting activities from gaseous emissions was conducted through the method mentioned in 5.1.1. Among the main gaseous emissions sources identified were effluent treatment plant, boiler operations, fossil fuel consumptions by machinery and fertilizers consumption to name a few.	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Significant pollutants and greenhouse gas (GHG) emissions were identified includes methane from effluent, smoke and fertilizer usage have been documented. Implementation and monitoring of GHG emissions is carried out and submitted to RSPO.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>5.6.3</p> <p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.</p> <p>- Minor compliance -</p>	<p>RSPO GHG calculator ver. 3.0.1 was used to calculate the GHG emission of the certification unit for 2018 performance.</p> <p>Verification of data through inspection of various records such as</p> <ul style="list-style-type: none"> - JD Edwards Enterprise One system - store detail master Listing (Final) - bin cards <p>showed that the input data was authentic and verifiable.</p> <p>The mill has also conducted its smoke emission monitoring through complying its DOE’s compliance schedule (<i>Jadual Pematuhan</i>) and reports were well maintained for verification e.g.:</p> <ul style="list-style-type: none"> - Stack sampling were conducted twice a year as per Compliance Schedule requirement. The following reports were verified: <ul style="list-style-type: none"> o PAC-AE-190710 dated 12/7/2019, result: 0.576 g/Nm³ for boiler #3 – action plan to retune the boiler has been established – Sindora POM has appointed a contractor to deliver troubleshooting job [ref.: PO# 19000240 OS, dated 22/9/2019. A retest will be conducted once the retuning is done and report will be sent to DOE. o PAC-AE-190120 dated 22/1/2019, result: 0.295 g/Nm³ for boiler #4 <p>The regulated limit is 0.15 g/Nm³. The mill has acknowledged the non-compliance of both its boilers and DOE has granted them a contravene license [#005343, valid until 5/6/2020].</p> - Ambient air analysis is conducted quarterly to gauge the air pollutants in the ambient air such as Particulate Matter, SO₂, NO₂, O₃;and CO: PAC-AA-190709 for Q3 2019, PAC-AA-190413 for Q2 2019, PAC-AA-190118/190119 for Q1 2019, ETD/A/KSS/2018-08/18151 for Q4 2018 	<p>Complied</p>
<p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p>		

Criterion / Indicator	Assessment Findings	Compliance
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.		

Criterion / Indicator	Assessment Findings	Compliance
<p>6.1.1</p>	<p>A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -</p> <p>At Sindora Estate, the SIA was done from 25 to 27 April 2016 by Malaysian Environment Consultants Sdn Bhd. Those consulted were internal stakeholders such as plantation workers (e.g. harvesters, sprayers, manuring workers/fertiliser application workers, general workers, crèche amah), both foreign and local; staff, executive and non-executive, and occupants within the plantations and mill (workers' dependents). External stakeholders consulted included contractors, suppliers and smallholders; local district authorities and federal agencies, disinterested groups, e.g. nongovernmental organisations; and adjacent plantations.</p> <p>At the Sindora POM, Sg Papan Estate and REM Estate, SIA is done every year. This involves getting feedback and inputs from various internal and external stakeholders. Among the stakeholders consulted were NUPW representatives, women's group representatives, medical assistants, workers (such as gardener, harvesters, field supervisors, graders, workshop operators, mill mandore, weighbridge operators), external stakeholder such as government agencies e.g. Immigration Department, Labour Department, contractors, FFB suppliers, sundry shop operators, representatives from the nearby schools such as SK LKTP Belitong, SMK LKTP Belitong, SK Sg Papan, nearby estates such as Felda Bukit Tongkat, Felda Ulu Belitong, Pusat Kesihatan Ulu Belitong, etc.</p> <p>Records of stakeholder meetings were all minuted and sighted during the audit. Sindora Estate and POM: Stakeholder meeting (15 September 2019), NUPW meeting (16 May 2019 & 6 August 2019), women's group meeting (22 July 2019). Sg Papan Estate: Stakeholder meeting minutes (22 August 2019), meeting with NUPW representatives (26 May 2019), and women's group meeting (26 April 2019).</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Evidence that the assessment was done with affected parties is available based on meeting minutes and confirmed during stakeholder interviews. For example, at Sindora POM, social audit consultation with workers (16 May 2019 and 18 June 2019), stakeholder meeting (15 Sept 2019), meeting with NUPW representatives (16 May 2019), women’s group meeting (22 July 2019). Similarly, at Sg Papan Estate, stakeholder meeting (22 August 2019), Sindora Estate NUPW meeting (6 August 2019) and stakeholder meeting (15 Sept 2019).	Complied

Criterion / Indicator	Assessment Findings	Compliance
<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.</p> <p>- Major compliance -</p> <p>The plans for avoidance or mitigation of negative impacts and promotion of positive ones are available in the form of Cadangan Penambahbaikan Sosial bagi Kompleks Sindora 2019. This document is used by the Sindoma POM and its supply base to identify positive and negative impacts, issues, mitigation of negative impacts and promotion of positive impacts, and person-in-charge.</p> <p>Positive impacts include provision of corporate social responsibility to local schools, school uniforms and transport facilities for workers' children, opportunities for women 's group (WoW) members to increase their income, availability of bank agents and estate shops so workers don't have to go to town to withdraw money, and provision of cash card for workers to ease the process of withdrawing money.</p> <p>In July 2019, REM Estate commenced replanting activities involving 238.45ha. Evidence is available that workers were consulted and informed of the replanting activities on 5 June 2019 during morning muster. This was further confirmed by harvesters interviewed at REM Estate. Workers were informed that replanting activities were planned for P93 Block 1,2,3 and P91 Block 3 & 4, and that it would not adversely impact the workers' income because workers would be allocated to work at another location. The briefing ended with a Q&A session. During audit interviews, harvesters at REM Estate confirmed that their salaries have not been negatively impacted by replanting activities.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The SIA action plans for Sindora Complex and its supply base which is known as Cadangan Penambahbaikan Sosial 2019 are being developed annually. For example, at the Sindora Mill and Sindora estate, the action plan was updated on 15 September 2019 (previous one dated 29 April 2018).	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	There is no smallholder schemes at the Sindora Complex and therefore, this Indicator is not applicable.	Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	All units within the Sindora Complex subscribe to Kulim (Malaysia) Berhad’s documented Consultation and Communications Procedures and Guidelines (Communication Procedure V 2.0) dated November 2009. The aim of this plan is to ensure an open and transparent communication methods with local communities and other stakeholders. The guideline is specific to communicate and consult in respect of social aspects, impacts and performance.	Complied

Criterion / Indicator		Assessment Findings	Compliance															
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	<p>Each unit within the Sindora Complex has its own management official responsible for social issues are as follows:</p> <table border="1"> <thead> <tr> <th>Name of unit</th> <th>Management official responsible</th> <th>Letter of appointment</th> </tr> </thead> <tbody> <tr> <td>Sindora Palm Oil Mill</td> <td>Supervisor</td> <td>10/01/2019.</td> </tr> <tr> <td>Sg Papan Estate</td> <td>Assistant Manager</td> <td>1/01/2019.</td> </tr> <tr> <td>REM Estate</td> <td>Gender Committee clerk</td> <td>24/07/2018</td> </tr> <tr> <td>Sindora Estate</td> <td>Senior Assistant Manager</td> <td>1/01/2019</td> </tr> </tbody> </table> <p>Interview with the management official responsible at the Sindora Mill confirmed his understanding of his roles and responsibilities.</p>	Name of unit	Management official responsible	Letter of appointment	Sindora Palm Oil Mill	Supervisor	10/01/2019.	Sg Papan Estate	Assistant Manager	1/01/2019.	REM Estate	Gender Committee clerk	24/07/2018	Sindora Estate	Senior Assistant Manager	1/01/2019	Complied
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Criterion / Indicator	Assessment Findings	Compliance
<p>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.</p> <p>- Minor compliance -</p>	<p>Each unit within the Sindora Complex has its own list of stakeholders. The stakeholders comprise FFB suppliers, transporters, contractors, government agencies such as Dept of Safety and Health, Indonesian Consulate, Labour Department, Department of Immigration, Department of Environment, nearby plantations such as FGV Belitong, surrounding villages such as Kg Tg Serindit, Kg Muhibbah, nearby schools, clinics, etc.</p> <p>There is evidence of records of communications with stakeholders and efforts were made to ensure understanding by affected parties. This comes in the form of briefings to stakeholders on RSPO, MSPO and ISCC requirements. Stakeholders were also informed that they are expected to comply with the relevant laws pertaining to foreign labour (passports and permits), payment of minimum wages, requirements to extend copies of the workers' contracts and payslips. Additionally, sundry shops operating within the estates were informed that they cannot sell expired goods, alcohol and explosives, and are required to display the price of items.</p> <p>Stakeholder meetings were all minuted, were made available and verified during the audit. The Sindora Estate and Palm Oil Mill had its stakeholders meeting on 15 September 2019 which was attended by 32 stakeholders such as contractors, sundry shop owners, SK LKTP Belitong, SMK LKTP Belitong, nearby estates such as Felda Bukit Tongkat, Felda Ulu belitong, Pusat Kesihatan Ulu Belitong, and FFB suppliers.</p> <p>Sg Papan Estate stakeholder meeting was held on 22 August 2019 and was attended by 23 persons comprising field staff, medical assistant, field supervisor, contractors, sundry shop owners, and headmaster of SK Sg Papan.</p>	<p>Complied</p>
<p>Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>6.3.1</p>	<p>The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.</p> <p>- Major compliance -</p> <p>For effective communication with internal and external stakeholders on matters pertaining to social issues, Sindora Complex subscribes to the documented Grievance Procedure Plans and Grievance Policy (Polisi Kilanan) dated 1 May 2018. Additionally, the Communication Procedure V2.0 Communication and Consultation Management Guidelines aims to effectively communicate with internal and external stakeholders on matters pertaining to social and environmental aspects and impacts and social and environmental performance of KULIM mill and estates.</p> <p>Additionally, the Mill and estates within the Sindora Complex has a grievance box which is placed outside the office to allow anyone to anonymously lodge a complaint.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>6.3.2 Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –</p>	<p>Evidence of documented process by which a dispute was resolved is available and verified during the audit Sampled were the following:</p> <p>A complaint lodged by a Mill worker dated 12 Nov 2018 against the then Medical Assistant, for verbal abuse. Action was taken by the management in October 2019 to replace the Medical Assistant. At Sindora Estate, a complaint was lodged by a staff on 23 June 2019 against trespassing act committed by workers near her house. The relevant workers were immediately informed not to trespass into staff housing area.</p> <p>Other samples involved requests for house repairs which are clearly documented. Based on the records available, the complaints were generally resolved within 48 hours. Sighted were the following House Repair Report (Laporan Kerosakan Rumah):</p> <p>Mill – complaint dated 15 Sept 2019 (fused toilet lights) which were repaired on the same day.</p> <p>Sg Papan Estate - complaint dated 2 October 2019 (broken ceiling) was repaired on 3 Oct 2019, complaint dated 26 September 2019 (broken back door) was repaired on 1 Oct 2019.</p> <p>REM Estate - complaint dated 17 Sept 2019 (tripping of main switch) was repaired on 18 September 2019, and complaint dated 3 Sept 2019 (broken window) was repaired on 8 Sept 2019.</p>	<p>Complied</p>
<p>Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>		

Criterion / Indicator		Assessment Findings	Compliance
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation is in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4 September 2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	An SOP known as Negotiations Concerning Compensation Program dated 4 September 2007 was established by Kulim (Malaysia) Berhad to identify legal and customary rights as well as people entitled to compensation as per procedure in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4 September 2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	There has been no evidence of any dispute, negotiated agreements and compensation claims involving units within the Sindora Complex.	Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			

Criterion / Indicator		Assessment Findings	Compliance								
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	<p>Documentation and conditions of pay are available in the form of pay slips, employment contracts and letters of appointment. A pay slip, which is given to every employee, contains details such as basic wages, piece rate wages, special allowances, wage top-ups, overtime, paid public holidays, paid medical leave, work on rest day, vacation leave pay, etc. The pay slip also details out all deductions made (statutory such as SOCSO, EPF, Employers Insurance Scheme) and other deductions (electricity and water, Tabung Khairat, NUPW, etc). Sighted during the audits were employment contracts and payslips for the months of January 2019, March 2019 and August 2019 for the following workers:</p> <table border="1"> <thead> <tr> <th>Mill / Estates</th> <th>Workers' numbers</th> </tr> </thead> <tbody> <tr> <td>Sindora Palm Oil Mill</td> <td>#623123, #623226, #623128, #623140.</td> </tr> <tr> <td>Sg Papan Estate</td> <td>#625012, #625600, #625904, #626175, #626178, #626177.</td> </tr> <tr> <td>Sindora Estate</td> <td>#680681, #680675, #622948, #680200.</td> </tr> </tbody> </table> <p>It was duly verified during the audit that workers are paid in accordance with the Minimum Wages (Amendment) Order 2018 which is a minimum of RM1,100 per month, or RM42.31 per day.</p>	Mill / Estates	Workers' numbers	Sindora Palm Oil Mill	#623123, #623226, #623128, #623140.	Sg Papan Estate	#625012, #625600, #625904, #626175, #626178, #626177.	Sindora Estate	#680681, #680675, #622948, #680200.	Complied
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Sindora Estate	#680681, #680675, #622948, #680200.										

<p>6.5.2</p>	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -</p>	<p>All workers have signed employment contracts (for foreigners), and letters of appointment (for locals). Each document contains provisions related to job scope, wages, allowances as per MAPA/NUPW, working hours, contract duration, mutual termination notice, holidays, paid annual leave, medical leave, other benefits, deductions, etc. It was observed during the audit that workers from Indonesia have their employment contracts prepared in Bahasa Malaysia; whereas Bangladeshi workers have their contracts in English with a Bengali translation. Details of the documents were briefed to the workers by management officials prior to signing. The following employment contracts were verified during the audit:</p> <p>Sindora Palm Oil Mill:</p> <ul style="list-style-type: none"> - Worker #623123 (Malaysian) signed 1 June 2019. - Worker # 623128 (Malaysian) signed on 1 June 2019. - Worker # 623226 (Indonesian) signed on 1 June 2019 for a period of 2 years - Worker # 623126 (Indonesian) signed on 1 June 2019 for a period of 2 years. - Worker # 623140 (Indonesian) signed on 1 June 2019 for a period of 2 years <p>Sg Papan Estate:</p> <ul style="list-style-type: none"> - Worker #625013 (Malaysian) signed on 1 June 2019 - Worker #625600 (Indonesian) signed on 1 March 2019 for 2 years - Worker #625904 (Indonesian) signed on 1 March 2019 for 2 years - Worker #626175 (Indonesian) signed on 1 March 2019 for 2 years - Worker #626176 (Indonesian) signed on 1 Marc 2019 for 2 years - Worker #626177 (Indonesian) signed on 1 March 2019 for 2 years <p>Sindora Estate: Workers No: 680681 (Bangladesh) contract signed on 28 Feb 2019 for 3 years</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>Worker No: 680675 (Indonesian) contract signed on 1 August 2019 for 2 years Worker No: 680428 (Bangladesh) contract signed on 28 Feb 2019 for 3 years. Worker No: 622948 (Bangladesh) contract signed on 28 Feb 2019 for 3 years. Worker No: 680200 (Bangladesh) contract signed on 28 Feb 2019 for 3 years.</p> <p>For any salary deductions, evidence of workers’ written consent and approval received from the Labour Office were available. The details are as follows:</p> <p>Sg Papan Estate:</p> <ul style="list-style-type: none"> - Labour Office letter dated 31 March 2019 (Ref: TK (NJ) U-21) for deduction towards Skim Khairat Keluarga. - Labour Office letter dated 24 June 2005 (JTK Serial No: PP3/34/1069) for Great Eastern Insurance Multiple Benefits Scheme <p>Sindora Palm Oil Mill:</p> <ul style="list-style-type: none"> - Labour Office letter dated 26 November 2009 Ref No: (TK (NJ) PERMIT/2008/AM/S.24JLD 2) for Skim Khairat Keluarga. 	

<p>6.5.3</p>	<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. - Minor compliance –</p>	<p>Based on interviews, observations and visit made to the linesites, there is evidence that all workers of the Sindora Complex are being provided with adequate housing, water supplies, medical and welfare amenities in accordance with the requirements of the Workers’ Minimum Standard of Housing Act 1990. Each house has 3 rooms with a maximum capacity of 6 occupants per house. The linesites are generally well-kept in terms of rubbish disposal, cleanliness of peripheral drains, and grass height. Linesite inspections are also being carried out by the HA or MA on a weekly basis as recorded in the linesite inspection reports:</p> <ul style="list-style-type: none"> - Sindora Palm Oil Mill: 7-11 October 2019, 1-4 October 2019, 22 – 27 Sept 2019, 17 – 20 Sept 2019 - Sindora Estate: 7-11 October 2019, 1-4 October 2019, 22 – 27 September 2019, 17 – 20 September 2019 - Sg Papan Estate: 29 Sept 2019, 22 Sept 2019, 11 Sept 2019, 4 Sept 2019, 18 August 2019. - REM Estate: 3 Oct 2019, 26 Sept 2019, 19 Sept 2019, 12 Sept 2019, 5 Sept 2019, 29 August 2019, 22 August 2019. <p>Facilities available include football fields, courts for volleyball/netball, futsal, takraw, children’s playground, sundry shops, mini library, places of worship, community hall, clinics and creche. Water and electricity is supplied by Syarikat Air Johor and Tenaga Nasional Berhad, respectively, and usage is being subsidized by the company of up to 35 gallons per worker and each dependant per day, and 50kW per house per month.</p> <p>The clinics are manned by either a Health Assistant or a Medical Assistant. Medical care is provided for the workers and also their dependants. The Visiting Medical Officers visit the clinics on a fortnightly basis as required under Section 19(3) of the Workers’ Minimum Standard of Housing Act 1990. The VMO visits were as follows:</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings			Compliance											
		<table border="1"> <thead> <tr> <th>Clinic location</th> <th>VMO</th> <th>Dates of visits (2019)</th> </tr> </thead> <tbody> <tr> <td>Mill & Sindora Estate</td> <td>Klinik Mesra, JB</td> <td>9 July, 23 July, 13 Aug, 27 Aug, 17 Sept</td> </tr> <tr> <td>REM Estate (Main clinic)</td> <td>Klinik Moiz, Kota Tinggi</td> <td>9 April, 2 May, 13 June, 4 July, 27 Aug, 17 Sept</td> </tr> <tr> <td>REM Estate (at Pasak Division)</td> <td>Klinik Moiz, Kota Tinggi</td> <td>22 April, 20 May, 24 June, 22 July, 12 Aug, 23 Sept</td> </tr> </tbody> </table>	Clinic location	VMO	Dates of visits (2019)	Mill & Sindora Estate	Klinik Mesra, JB	9 July, 23 July, 13 Aug, 27 Aug, 17 Sept	REM Estate (Main clinic)	Klinik Moiz, Kota Tinggi	9 April, 2 May, 13 June, 4 July, 27 Aug, 17 Sept	REM Estate (at Pasak Division)	Klinik Moiz, Kota Tinggi	22 April, 20 May, 24 June, 22 July, 12 Aug, 23 Sept		
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Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.4</p> <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>There is evidence of efforts made to monitor and improve workers' access to adequate, sufficient and affordable food within the Sindora Complex. Management of each unit requires the respective canteen and sundry shops to submit a list of prices to the office for monitoring. Sighted during the audit were price list submitted by Kedai Runcit Guan Tat (at Sg Papan Estate) for essential items such as flour, onions, canned food, water, soap, eggs, cooking oil, etc. This price list of items sold in the shop include flour, onions, canned food, water, soap, eggs, cooking oil, etc was provided to the management and monitored by 3 persons from the estate.</p> <p>Similarly, Sailees Mini Mart (at Sindora Estate and Mill) too submitted theirs on 4 June 2019, 8 July 2019, August 2019, September 2019, for essential items such as chicken, beef, rice, flour, salt, sugar, cooking oil, onion, garlic, etc for monitoring purposes.</p> <p>Additionally, as evidenced by minutes of stakeholders' meeting, canteen operators are reminded to display prices and to remove any expired food items from the shelves.</p> <p>Visit to the sundry shop confirm that price labels are adequately displayed and prices are within the range indicated in the price list.</p>	<p>Complied</p>
<p>Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>		

Criterion / Indicator	Assessment Findings	Compliance	
6.6.1	<p>A published statement in local languages recognising freedom of association shall be available.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>A published statement on freedom of association is available and displayed at the main notice boards within the Sindora Complex. Sampled were:</p> <ul style="list-style-type: none"> - A memo dated 12 March 2019 written in Bahasa Malaysia and signed by the Assistant-in-charge at REM Estate recognising the workers’ rights to freedom of association. - A statement in Bahasa Malaysia dated 1 January 2019 was also displayed at Sindora and Sg Papan Estates. - Paragraph 2 of the Employees’ Guide Book which confirms and respects workers’ rights to join a union recognized by the Kulim (Malaysia) Berhad. - Kulim (Malaysia) Berhad’s Core Labour Standards on Rights of Employees states that Kulim recognises and respects the rights of employees to form and/or join trade unions of their choice which are given due recognition by KULIM 	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	<p>Kulim (Malaysia) Berhad is a member of the Malaysian Agricultural Producers Association (MAPA) and is therefore subjected to the agreement between MAPA and the National Union of Plantation Workers (NUPW). Minutes of meetings held between management and NUPW representatives are documented.</p> <p>At Sindora Mill, meetings between Mill management, NUPW representatives & Indonesian workers was held on 16 May 2019. This meeting was attended by 54 persons. Among issues raised included briefing on wage increment based on new wage tariff from 1 April 2018. Another meeting was between management, NUPW & Indonesian workers held on 3 March 2019 which discussed issues pertaining to cleanliness, rubbish disposal, house repairs, etc.</p> <p>At Sg Papan Estate, the meeting between management and NUPW committee members was held on 26 May 2019, attended by 7 NUPW committee members and 6 management representatives. Issues discussed include RSPO, MSPO and ISCC requirements and company policies.</p> <p>At Sindora Estate, NUPW meeting was held on 6 August 2019. This meeting was attended by 4 employer representatives, and 6 worker representatives and the issues discussed included priority repairs to be carried out at the linesite.</p>	Complied
Criterion 6.7: Children are not employed or exploited.		
6.7.1 There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Documentary evidence that minimum age requirements are met is available in the form of workers' check roll list and copies of their passport/NRIC details. Based on these documents, there is evidence that all workers are more than 18 years old as of the date they were employed by the units within the Sindora Complex.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	All units within the Sindora Complex subscribe to the Kulim (Malaysia) Berhad’s Business Policy, Core Labour Standard and People Policy where fairness and equal opportunities for relevant group such as all employees, including foreign and local are embedded.	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 -	Based interviews with mill workers, harvesters, loose fruit collectors, mandores, SK LKTP Belitong, local communities from Kg Tg Serindit, there is evidence that they have not been discriminated against. All workers are entitled to the same pay scale and all benefits such as housing, medical facilities, and use of all amenities, irrespective of race, gender, nationality.	Complied
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 -	Recruitment selection of workers are done based on skills, capabilities, qualities, and medical fitness. This is evidenced by the recruitment process of an employee #623122. Sighted in the file was the person’s job application dated 2 Jan 2015, interview notes and recommendation. The person was subsequently sent for medical check-up whereupon the estate Health Assistant recommended his fitness for work whereupon he was issued with an offer letter dated 4 Jan 2015.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			

Criterion / Indicator	Assessment Findings	Compliance
6.9.1	<p>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 -</p> <p>All units within the Sindora Complex subscribe to Sexual Harassment Policy dated 1 May 2018 signed by Executive Director. This Policy has been communicated to all levels of workforce as follows:</p> <p>Sindora Palm Oil Mill: via WoW’s meetings on 22 July 2019, 15 Feb 2019, 24 Jan 2019. Sg Papan Estate: via WoW’s meeting held on 26 April 2019 and during morning muster on 31 May 2019. REM Estate: Morning muster on 24 April 2019 and WoW meeting on 29 September 2019</p> <p>During these meetings/briefings, a briefing on sexual harassment and grievance procedure was discussed where the Chairperson explained what acts constitute sexual harassment and abuse. Interviews conducted with female employees also confirmed their understanding of the Company’s Sexual Harassment Policy and the grievance channel. They also confirmed that they have not encountered any incidence of sexual harassment.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.9.2	<p>A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p> <p>All units within the Sindora Complex subscribe to Kulim (Malaysia) Berhad’s Core Labour Standard dated 1 May 2018 signed by Executive Director. This Standard specifies that the Company recognizes the rights of employees to reproduction and reproductive health, including the right to make decision on reproduction. Based on interviews with the workers, there is evidence that this Standard is being implemented where female workers are entitled to 60 days paid maternity leave, and pregnant women are given light work to do. This Standard has been communicated to all levels of workforce as follows:</p> <p>Sindora Palm Oil Mill: via WoW’s meetings on 22 July 2019, 15 Feb 2019, 24 Jan 2019.</p> <p>At Sg Papan Estate: via WoW’s meeting held on 26 April 2019, briefings to all field workers and contract workers on 21 Feb 2019 and 28 May 2019.</p> <p>REM Estate: briefing to all office staff on 29 September 2019.</p>	Complied
6.9.3	<p>A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p> <p>Specific grievance mechanism which respects anonymity and protects complainants has been established with the setting up of Panel Aduan Wanita Semakan 1; 25/7/2008 among woman employees to receive any grievance for Sindora complex.</p>	Complied
<p>Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>		
6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>- Minor compliance -</p> <p>Current and past prices paid for FFB is displayed at the weighbridge at the Sindora palm Oil Mill. As of the date of the audit, the prices displayed were for the months of Jan until September 2019.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
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 -	Interviews were conducted with Nilam Megah Sdn Bhd (FFB supplier for the Mill) and Pengangkutan Sempurna Sdn Bhd (EFB transporter for REM Estate). Both parties confirmed that FFB pricing and pricing mechanism have been made clear to them. The fees and details of payment mechanism are contained in their contracts the Mill and estate, respectively.

Criterion / Indicator	Assessment Findings	Compliance	
6.10.3	<p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>- Minor compliance -</p>	<p>Based on interviews conducted with Nilam Megah Sdn Bhd (FFB supplier for the Mill), Pengangkutan Sempurna Sdn Bhd (EFB transporter for REM Estate) and Kanaan Enterprise (replanting works at REM Estate), SOKO SK Enterprise (machinery and manpower services), Tek Lee Construction Contractor (Sindora Estate) all parties understand the contractual agreements they entered into. They also confirmed that the contracts are fair, legal and transparent.</p> <p>Sighted were the following contracts:</p> <ul style="list-style-type: none"> - Kanaan Enterprise contract dated 27 August 2019 commencement on 15 June 2019 expiring on 31 Dec 2019, for replanting of P19 (238.45ha) at Ladang REM, Kota Tinggi, Johor. - SOKO SK Enterprise dated 1 November 2018 for a period of 3 years until 31 October 2021 with an option for a 2-year contract renewal for loading and transporting of FFB at P15 (144.41 ha); - SOKO SK Enterprise commenced on 1 April 2017 for 3 years expiring on 31 March 2020 for harvesting, loading and transporting FFB at Field P14 to ramp at ladang REM. - Tek Lee Construction Contractor contract commenced on 1 Jan 2017 expired on 31 Dec 2017. Extended 8 Dec 2016 for 1 year and extended until 31 December 2019 for the supply of JCB. There is also a letter dated 18 Jan 2016 from Sindora Estate granting written consent to Tek Lee Construction Contractor to assign contract to Ravi Brothers Construction. <p>Contracts detail out obligations of the contractors towards complying with all legal requirements related to workers' wages, insurance, payment mechanism, duration of contract, etc.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	Based on interviews held with SOKO SK Enterprise, Nilam Megah Sdn Bhd, Tek Lee Construction Contractor, Kannaan Enterprise, Pengangkutan Semporna Sdn Bhd, all parties confirmed that agreed payments are made in a timely manner, i.e. within 14 days of issuance of invoice.	Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			

Criterion / Indicator	Assessment Findings	Compliance
<p>6.11.1 Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –</p>	<p>It is demonstrated that contributions to local development are being carried out based on consultations with the local communities. For example, Sg Papan Estate extends its medical treatment to the local community and surrounding stakeholders if necessary. Additionally, Hindu communities nearby are allowed to use the temple at Sg Papan Estate for worshipping and other religious ceremonies.</p> <p>The local communities are also being afforded job opportunities as evidenced by the number of workers employed from within the local vicinity. For example, Sindora Estate employs 9 local workers/staff who live in nearby settlements of Felda Ulu Belitong and Taman Sri Lambak. Sg Papan Estate employs 8 persons from the local communities and the Sindora Palm Oil Mill employs 27 persons from the nearby villages and settlements.</p> <p>Additionally, REM Estate has demonstrated the following contributions to the local community:</p> <ul style="list-style-type: none"> - Maintenance of Hindu temple and allowing outside communities to use the temple. The estate has repaired leakages and repainted the temple structure based on letter from temple chairman letter dated 29 August 2019. - Allowing 28 outside pupils out of 32 pupils to attend SRJK (T) allowing outside children to attend. - Allowing the local hash harriers to enter the estate premises on 6 October 2019, 1 Sept 2019, 18 August 2019 for weekend recreational activities based on written requests. - Allowing Pusat Latihan Tempur Tentera Darat to use the estate premises for 50 trainees’ training ground from 5 April 2019 until 22 April 2019. 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	There is no scheme smallholders at Sindora Complex, therefore this indicator is not applicable.	Not applicable
Criterion 6.12: 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 -	Based on documentation review, interviews conducted and observations, there is no evidence of any form of forced or trafficked labour within the Sindora Complex. All workers are free to move about and leave the premises if they wish. Foreign workers are given the option to either keep their passports at the office, or to keep the passports themselves.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	Based on documentation review, interviews conducted and observations, there is no evidence that contract substitution has occurred. All foreign workers interviewed confirmed that the job being offered at Sindora Complex is the same that was represented to them while they were still in their home country.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	A special labour policy and procedures have been established under the Kulim (Malaysia) Berhad Core Labour Standard signed by Executive Director dated 1 May 2018	Complied
Criterion 6.13: Growers and millers respect human rights.			

Criterion / Indicator		Assessment Findings	Compliance
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	Sindora Mill Complex subscribes to Kulim (Malaysia) Berhad’s Polisi Insan which states that the Company would treat its employees with respect, dignity and fairness, providing fair remuneration and safe working conditions. The Company’s Core Labour Standard also specifies that it would ensure the rights of all employees, including contract, temporary and migrant workers are respected according to local, national, and ratified laws and practices. These Policies and Standard were communicated to all levels of workforce at REM Estate on 10 May 2019 and 29 September 2019, whereas as Sg Papan Estate on 25 July 2019.	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.	Sindora Complex is situated in Johor, Peninsular Malaysia and therefore this indicator is not applicable.	Not applicable
Principle 7: Responsible development of new plantings			
Sindora Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this surveillance assessment. The immature areas are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>The action plan for continual improvement for the mill & estates is basically incorporated with its management action plan which focuses on economic, social and environmental values, e.g.:</p> <p><u>Mill:</u></p> <ul style="list-style-type: none"> - To construct 38,000 m3 holding pond to manage bund leakage at other ponds - Increase of hydraulic retention time to improve polishing plant performance - Increase the furrow capacity so that longer retention time can be achieved. - To install Electrostatic Precipitator to improve dark smoke emission quality <p><u>Estates:</u></p> <ul style="list-style-type: none"> - Environment – road grading programme, planting f cover crop, drainage desilting - OHS – continuous training on OHS - Social – upgrading & maintaining labour quarters, social event with workers involvement such as Hari Raya and family day celebration - Productivity – mechanisation and continuous training on harvesting activity 	<p>Complied</p>

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Appendix B: Approved Time Bound Plan

Project	Estate	Plan
Indonesia: SUMASEL	PT Tempirai Palm Resources (PT TPR)	To be included in TBP upon completion of acquisition (expected completion in 2025)
	PT Rambang Agro Jaya (PT RAJ)	
Malaysia Trader	Bukit Layang Estate	2019
Malaysia Trader	Eng Lee Heng	2019

List of Estate Manage by Kulim (Malaysia) Berhad			
Mill Base	Kulim / Jcorp Estate	Estate	Status
Tereh Mill		Tereh Utara	Certified RSPO
		Tereh Selatan	
		Selai	
		Enggang	
		Mutiara	
		Sg Sembrong	
		Sg Tawing	
		Rengam	
Sedenak Mill		Sedenak	
		Basir Ismail	
		Ulu Tiram	
		Kuala Kabong	
Sindora Mill	Kulim Estate	REM/Pasak	
		Sindora	
		Sungai Papan	
		Sepang Loi	
Palong Mill		UMAC	
		Labis Bahru	
		Mungka	
		Kemedak	
		Palong	
Pasir Panjang Mill	Kulim Estate	Pasir Panjang	Certified RSPO
		Siang	
	Jcorp Estate	Bukit Kelompok	

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		Tunjuk Laut	
		Pasir Logok	
		Bukit Payung	

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2018** for **Sindora POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2018** for **Sindora Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.12
PKO	1.12

Extraction	%
OER	20.86
KER	5.28

Production	t/yr
FFB Process	242,679.44
CPO Produced	50,622
PKO Produced	12,812

Land Use	Ha
OP Planted Area	28,363.09
OP Planted on peat	0
Conservation (forested)	610.95
Conservation (non-forested)	0
Total	28,974.04

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	69018.62	0.52	1295.74	0.55	60419.95	0.63	130734.31	1.7
CO ₂ Emission from fertilizer	8103.13	0.06	130.87	0.06	1748.13	0.02	9982.13	0.14
NO ₂ Emission	9462.80	0.07	82.98	0.04	999.48	0.01	10545.26	0.12
Fuel Consumption	1241.64	0.01	48.30	0.02	652.52	0.01	1942.46	0.04
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-67306.47	-0.51	-1228.18	-0.52	-40919.92	-0.42	-109454.57	-1.45
Conservation Sequestration	-13.28	0	-37.55	-0.01	0	0	-50.83	-0.01

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Total	20506.44	0.15	292.16	0.13	22899.16	0.25	43698.76	0.54
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**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	31089.90	0.13
Fuel Consumption	361.74	0
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	-4005.56	-0.02
Sales of EFB	0	0
Total	27,446.07	0.11

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	14369.18
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	27
Divert to anaerobic digestion (%)	73

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	64
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	36

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

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Sindora Palm Oil Mill takes legal ownership and physically handles its RSPO certified oil palm products i.e. CPO and PK.	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Sindora POM is not a trading company. Therefore, this requirement is not applicable.	N/A
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 (Johor Corporation) is the member of RSPO [membership no.: 1-0080-09-000-00] and the mill is registered in the Palm Trace system [member ID: RSPO_PO1000001264].	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Processing aids are not used in the milling process.	N/A
5.2 Supply chain model			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Sindora POM is using the MB supply chain model since it receive the FFB from own supply bases and outside FFB suppliers. For buyer who doesn’t require RSPO certified CPO	Yes

		or PK, downgrading can be done from certified material to non-certified material.	
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Sindora POM is using the MB supply chain model since it receive the FFB from own supply bases and outside FFB suppliers.	Yes
5.3. Documented Procedures			
5.3.1	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: <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	The SOP Sustainable Management System, Traceability, Doc. No: SQD/SMS/1.2, rev:4 dated 20 September 2019. On the marketing side, guidance document, RSPO Supply Chain, MKD/001, rev:01 dated 9/10/18 is referred to.	Yes
	<ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	The RSPO SCC training & traceability has been conducted on 18/9/2019 at Sindora Mill attended by person in charge from various position such as assistant manager, weighbridge operators, general clerk etc.	Yes
	<ul style="list-style-type: none"> • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard. 	The person having overall responsibility for and authority over the implementation is Head of each operating unit for RSPO, MSPO and ISCC Certification Program, as per appointment letter SQD/ADMIN/020/2018, 30 th June 2018.	Yes
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; <ul style="list-style-type: none"> i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. 	The Sustainable Management System, Internal Audit Doc. No: SQD/SMS/5.0 Date 1 July 2018 as the Internal Audit Procedure where the SCC audit shall be conducted as per Internal Audit Process which covers internal audit schedule (plan), audit report, non-conformance report, correction and corrective action, review and closing the NCR.	Yes
	ii) effectively implements and maintains the standard requirements within its organization	As per SOP, the management has conducted the Internal Audit at least once within 12 months (before the expiry of the	Yes

		certificate). Internal audit Non-conformance Report and Internal Audit checklist dated 29 September 2019 sighted for Sindora POM and available during the audit. No NC raised with regards to supply chain element.	
5.4. Purchasing and goods in			
5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the DO is as follows:</p> <ul style="list-style-type: none"> • Consignment note no. (238963) • Estate’s names (Sg Papan Estate) • Date & time of delivery (4/10/19) • Field No. (P15, P16 and P03) • Vehicle no. (WFW 4693) • RSPO certificate number (stamp) RSPO 612392 certified FFB <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> • Weighbridge ticket no. (26510) • Name of estates (REM Estate) • Field No. (P10, P12, P93, P88, P14 and P13) • Vehicle no. (JJY 9645) • Date & time in/out (21:22 – in, 22:16 – out) • Net weight 34.54 mt • RSPO certificate no. (RSPO 612392) 	Yes
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil 	The information was available in various documents such as delivery order and weighbridge tickets.	Yes

	palm products (for example, delivery notes, shipping documents and specification documentation).		
	<ul style="list-style-type: none"> The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping 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. 	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.	Yes
	<ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	A check of the validity of supply chain certification of supplier is done via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org). Physical RSPO certificate for all diverted crops sent to Sedenak Mill, e.g. from Tereh, Pasir Panjang and Sindora were verified. Validity check was done prior to each FFB delivery. As to date, no diversion crop received from other group estates.	Yes
	<ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	NA – this part is applicable for supply chain actor after refinery.	Yes
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 5.7. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch. Diversion should be kept at similar RSPO SCC module, i.e IP mill to IP mill, MB mill to MB mill only. Diversion from external will be classified at non-certified.	Yes
5.5. Outsourcing activities			
5.5.1	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	Sindora POM has use the service of transporter to transport CPO to buyer’s site. Sampled below contractor:	N/A

	<p>the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>Pengangkutan Olimpik for Transport of CPO from Mahamurni Plantations Sdn Bhd Group Mills to Various Refineries. Contract no: MPSB/CPO 1/2016(OLIMPIK), dated 25.02.2018, originally scheduled for completion on 28/02/2018 be extended to complete on 29/02/2020.</p> <p>However, outsourced activities is not included in the RSPO supply chain certificate scope.</p>	
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	Not applicable. No outsourcing activity.	N/A
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	Not applicable. No outsourcing activity.	N/A
	<p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	Not applicable. No outsourcing activity.	N/A
	<p>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.</p>	Not applicable. No outsourcing activity.	N/A
5.5.3	<p>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.</p>	<p>Sindora POM has use the service of transporter to transport CPO to buyer's site. Sampled below contractor:</p>	N/A

		<p>Pengangkutan Olimpik for Transport of CPO from Mahamurni Plantations Sdn Bhd Group Mills to Various Refineries. Contract no: MPSB/CPO 1/2016(OLIMPIK), dated 25.02.2018, originally scheduled for completion on 28/02/2018 be extended to complete on 29/02/2020.</p> <p>However, outsourced activities is not included in the RSPO supply chain certificate scope.</p>	
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 outsourced activity for processing.	N/A
5.6. Sales and goods out			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<p>Sindora POM ensured the required information is available in document form. Sampled contract: CPOMB-M1916, ref: PGO/01P/1807 dated 24/7/19, quantity 500 mt</p> <ul style="list-style-type: none"> • The name and address of the buyer; XXX • The name and address of the seller: Mahamurni Plantations Sdn Bhd, Sindora POM • The loading or shipment/ delivery date; e.g. 13/9/19 • The date on which the documents were issued: 24/7/19 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Crude Palm Oil (CPO) CSPO (MASS BALANCE) • The quantity of the products delivered; e.g. 500 mt • Any related transport documentation; e.g. Despatch note e.g. #C02265 • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 612392 	Yes

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		<ul style="list-style-type: none"> • A unique identification number: Shipping announcement, TR- 78237e85-a3ca Available in a few forms e.g. DN no., seal no., etc. <p>Sindora POM ensured the required information is available in document form. Sampled contract: MPOK 1762MB, ref: 728496 dated 12/9/19, quantity 500 mt</p> <ul style="list-style-type: none"> • The name and address of the buyer; XXX • The name and address of the seller: Mahamurni Plantations Sdn Bhd, Sindora POM • The loading or shipment/ delivery date; e.g. 19/8/19 • The date on which the documents were issued: 19/12/18 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Crude Palm Oil (CPO) CSPO (MASS BALANCE) • The quantity of the products delivered; e.g. 500 mt • Any related transport documentation; e.g. Despatch note e.g. #K00325 • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 612392 • A unique identification number: Shipping announcement, TR-6dc6ffa8- cdd6 Available in a few forms e.g. DN no., seal no., etc. 	
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>Information is complete and available in various documents such as sales contract, mill weighbridge ticket, delivery note, transporter collection order.</p>	<p>Yes</p>

	<ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	Detail of transaction can be found under table C of the report.	Yes
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	The registration of Palm Trace is handled by Marketing Department. All transaction will be registered in the Palm Trace.	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. 	Based on the announcement summary, all the registrations were found to be in order. Detailed transaction can be found under table C of the report.	Yes
	<ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	Not applicable. Products are not sold beyond refinery.	N/A

	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	Based on the quarterly mass balance accounting sheet, the removal of volumes was done correctly when the products were sold as conventional.	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Based on the announcement summary, all the confirmations were found to be in order.	Yes
5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training plan for 2019 were available which training for RSPO Supply Chain has been included.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor & assistant, weighbridge operators. Latest training was carried out on 23/9/19 given by mill assistant.	Yes
5.9. Record Keeping			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	As spelt out in the procedure, Control of Quality Records, SDPOM/SOP/7.6 issue: 3 dated 1/2/18 records are to be maintained minimum of three years.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Not applicable. The product of the facility is containing 100% palm oil.	N/A
5.10. Conversion factors			

5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER.	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
5.11. Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with 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. Refer to RSPO trademark and license registered under Kulim (M) Berhad (parent company: Johor Corporation) 1-0080-09-100-00 for supply chain model (IP and MB) valid until 22/8/21	Yes
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	The following was communicate in the group website - http://www.kulim.com.my/business-type.aspx?p_Id=23&c_Id=45&c=PLANTATION Kulim (M) Berhad is a subsidiary of the Johor Corporation and was amongst the earliest palm oil producers to be certified to the Roundtable on Sustainable Palm Oil ("RSPO") standard	Yes
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org)	The communication in http://www.kulim.com.my/business-type.aspx?p_Id=23&c_Id=45&c=PLANTATION states that Kulim (M) Berhad is RSPO certified.	Yes

	<p>c. State that the member supports the work of the RSPO</p> <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>		
4.3	<p>In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	<p>The communication in http://www.kulim.com.my/business-type.aspx?p_Id=23&c_Id=45&c=PLANTATION states that Kulim (M) Berhad is RSPO certified.</p>	Yes
4.4	<p>Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.</p>	<p>The communication in http://www.kulim.com.my/business-type.aspx?p_Id=23&c_Id=45&c=PLANTATION states that Kulim (M) Berhad is RSPO certified.</p>	Yes
4.5	<p>Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.</p>	<p>No logo used has been observed in the website, official documents etc.</p>	Yes
Business to business communications			
5.1	<p>Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.</p>	<p>Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.</p>	Yes
5.2	<p>When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.</p>	<p>Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (CSPK MASS BALANCE) and RSPO certificate number; RSPO 612392. Refer to despatch no.: K00325 dated 19/8/19. This also applies to CPO.</p>	Yes

5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <ul style="list-style-type: none"> a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. 	Sindora POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	N/A
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification. For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	Sindora POM is producing crude palm product and does not involved in any labelling of end product and the presence of certified palm oil contained within a product. This requirement is for the next supply chain actor and not applicable for POM.	N/A
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.</p>	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	N/A

6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	N/A

	applying to RSPO supply chain certified members. The guidance document for audits is available on www.rsपो.org .		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	NA	N/A
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	NA	N/A
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	NA	N/A
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.	NA	NA
Messaging (IP)			
	Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:	NA	NA

	<ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content (MB)			
	95% or above of the oil palm content must be RSPO MB-certified.	NA	N/A
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	NA	N/A
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs 	NA	N/A

	<p>of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</p> <ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. • In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. 	NA	N/A
	<p>Messaging NOT ALLOWED in storytelling in product-related communications:</p>	NA	N/A

	Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.		
MODULE C – PARTIAL PRODUCT CLAIMS			
	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> • The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. • At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. • The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. • The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. • The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. 	NA	N/A
MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES			
	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p>	NA	N/A

	<p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made</p>	NA	N/A
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Complaint is handled based on Management Process Procedure, Managing Customer Feedback, SDPOM/SOP/9.4, issue:3 dated 1/2/18	Yes
5.13. Management Review			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	Management review was last conducted on 30/9/2019. The meeting was chaired by Mill Manager and attended by mill management team. Frequency of meeting is on annual basis.	Yes
5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	<p>Based on the minutes of meeting, the following agendas were adequately recorded:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Analysis of data, FFB Quality, Production Performance, External provider’s performance, • Changes that could affect the management system. • Recommendations for improvement (process improvement, workplace planning etc.) 	Yes

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"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	<p>Discussion about the improvement of the effectiveness of the management system and its processes, and any resource needs were found to be included in the meeting minute.</p>	<p>Yes</p>
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Appendix E : CPO Mill Supply Chain Assessment Report (Module E – Mass Balance)

Requirements	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
E.1 Definition		
E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Sindora Palm Oil Mill receives and process certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During this recertification assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and sales volume of RSPO certified palm products through RSPO IT System.	Yes
E.2 Explanation		
E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Actual production recorded under table 10.	Yes
E.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).	The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim) under Palm trace ID (Palm Trace ID: RSPO_PO1000001264)	Yes
E.3 Documented procedures		
E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:	Latest written documented procedures, Sustainable Management System, Traceability, SQD/SMS/1.2, issue:4 dated 20 th September 2019 for the chain of custody with Mass Balance (MB) mode. This guidance procedure covers the RSPO Supply	Yes

<p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>Chain Certification Standard and Traceability for handling certified and noncertified FFB and developed based on the RSPO SCCS June 2017. On the marketing side, guidance document, RSPO Supply Chain, MKD/001, rev:01 dated 9/10/18 is referred to.</p> <p>The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive. The MB model is used because certified and non-certified FFB is received and processed at Sindora Palm Oil Mill.</p> <p>The mill manager and assistant manager have awareness of the supply chain system. Refer to appointment letter, ref SQD/ADMIN/021/2018 dated 30th June 2018 signed by Head of Plantation, Kulim (M) Berhad. Head of operating unit, the manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>	
<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Sindora Palm Oil Mill has documented procedures for the incoming FFB, processing and outgoing palm products (CPO and PK). System available to make marking/ID on the receiving documents to differentiate the certified and non-certified FFB received.</p>	<p>Yes</p>
<p>E.4 Purchasing and goods in</p>		
<p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. Diversion of FFB recorded for the period of October 2018 – September 2019. Records verified by internal and external audit.</p>	<p>Yes</p>

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<p>E.4.2 The site shall inform the CB immediately if there is a projected overproduction.</p>	<p>No overproduction recorded from last audit. If there is any over production, SQM will inform CB on the extension.</p>	<p>Yes</p>
<p>E.5 Record keeping</p>		
<p>E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p> <p>(b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short. (i.e product can be sold before it is in stock.)</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. Computerized system in place. Records verified by internal and external audit.</p> <p>Mass balance sheet named Sustainable Products Daily and Monthly Movement Summary Report for 2018 and 2019 are referred to.</p> <p>Site only delivers mass balance sales from positive stock. Noted credit sales for 10,000 mt on November 2018 and short sale of 5814.89 mt. By end 3 month, total volume required is still insufficient for -550.27 mt. Thus , a major NC was raised.</p>	<p>Major non-conformance</p>
<p>E.5.2 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement</p>	<p>PK is sold to 3rd party buyer. PK kernel crushing not outsourced to independent palm kernel crusher.</p>	<p>Yes</p>

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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit (Oct 2018-Sept 2019)				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	October 2018	15,473.08	10,276.95	25,750.03
2	November 2018	13,217.18	10,807.73	24,024.91
3	December 2018	12,451.72	11,644.58	24,096.30
4	January 2019	12,095.07	11,766.77	23,861.84
5	February 2019	11,236.28	9,235.18	20,471.46
6	March 2019	9,540.19	6,346.99	15,887.18
7	April 2019	10,259.30	9,183.50	19,442.80
8	May 2019	9,944.97	12,086.59	22,031.56
9	June 2019	10,329.73	7,000.04	17,329.77
10	July 2019	11,711.08	9,997.33	21,708.41
11	August 2019	12,882.62	10,240.40	23,123.02
12	September 2019	12,096.45	8,310.18	20,406.63
Total		141,237.67	116,896.24	258,133.91

B. Monthly Records of Certified CPO & PK since the last audit (Oct 2018-Sept 2019)			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Oct-18	3,012.48	779.93
2	Nov-18	2,820.05	671.70
3	Dec-18	2,856.43	697.66
4	Jan-19	2,794.75	717.71
5	Feb-19	2,406.64	621.02
6	Mar-19	1,875.47	490.33
7	Apr-19	2,315.90	567.05
8	May-19	2,619.41	545.04
9	Jun-19	2,030.79	453.08
10	Jul-19	2,525.77	567.20
11	Aug-19	2,701.02	698.30
12	Sep-19	2,394.14	540.75

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	Total	30,352.85	7,349.77
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C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) (Oct 2018-Sept 2019)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Buyer 1	NA	1,221.71	
2	Buyer 2	NA		363.58

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any) (Oct 2018-Sept 2019)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Buyer 1	ISCC	900.03	

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) (Oct 2018-Sept 2019)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	Buyer 1	28,274.44		
2	Buyer 2		7,590.94	

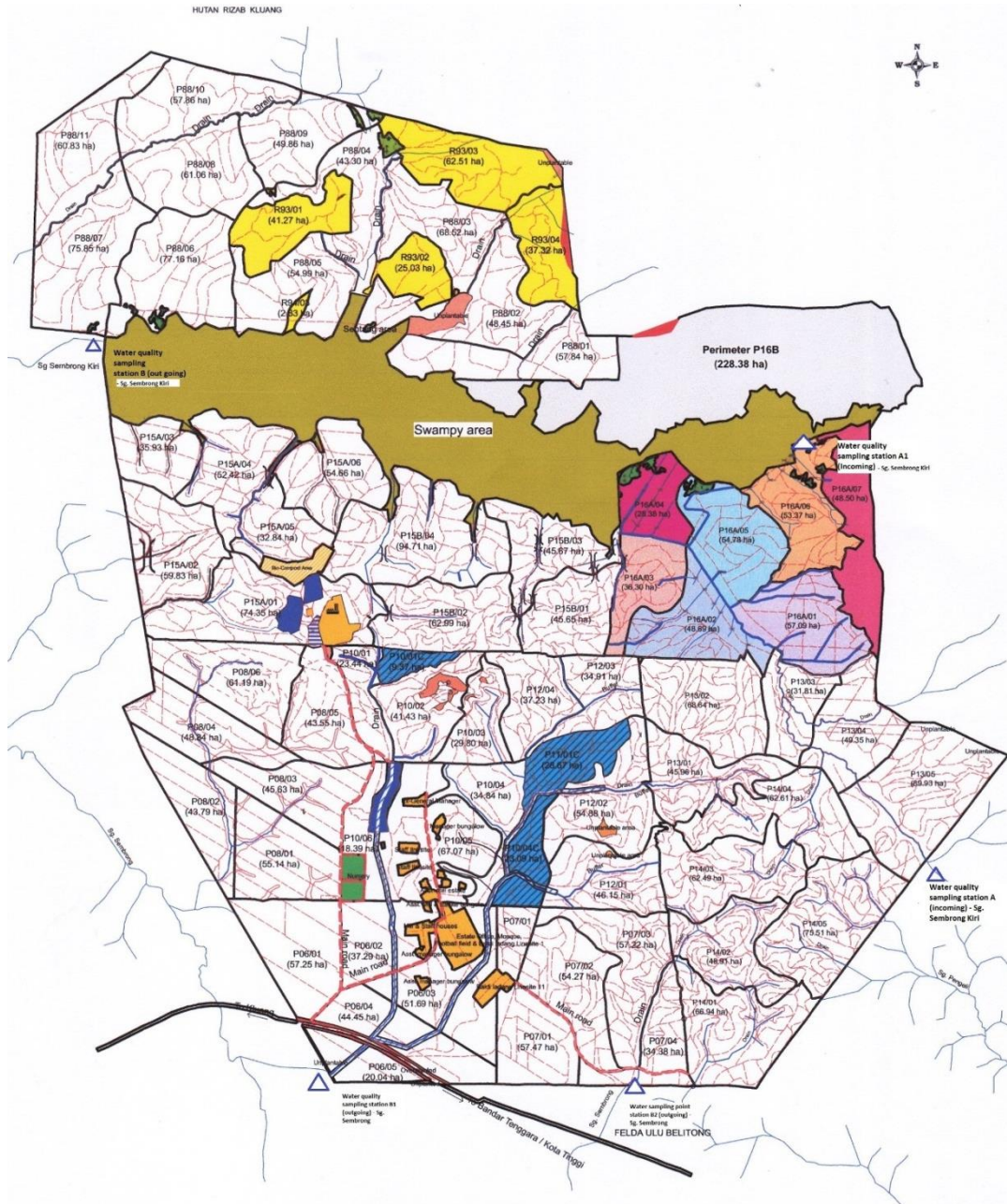
F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any) (Oct 2018-Sept 2019)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
1	Buyer 1	NA	15,537.00

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

Sindora POM

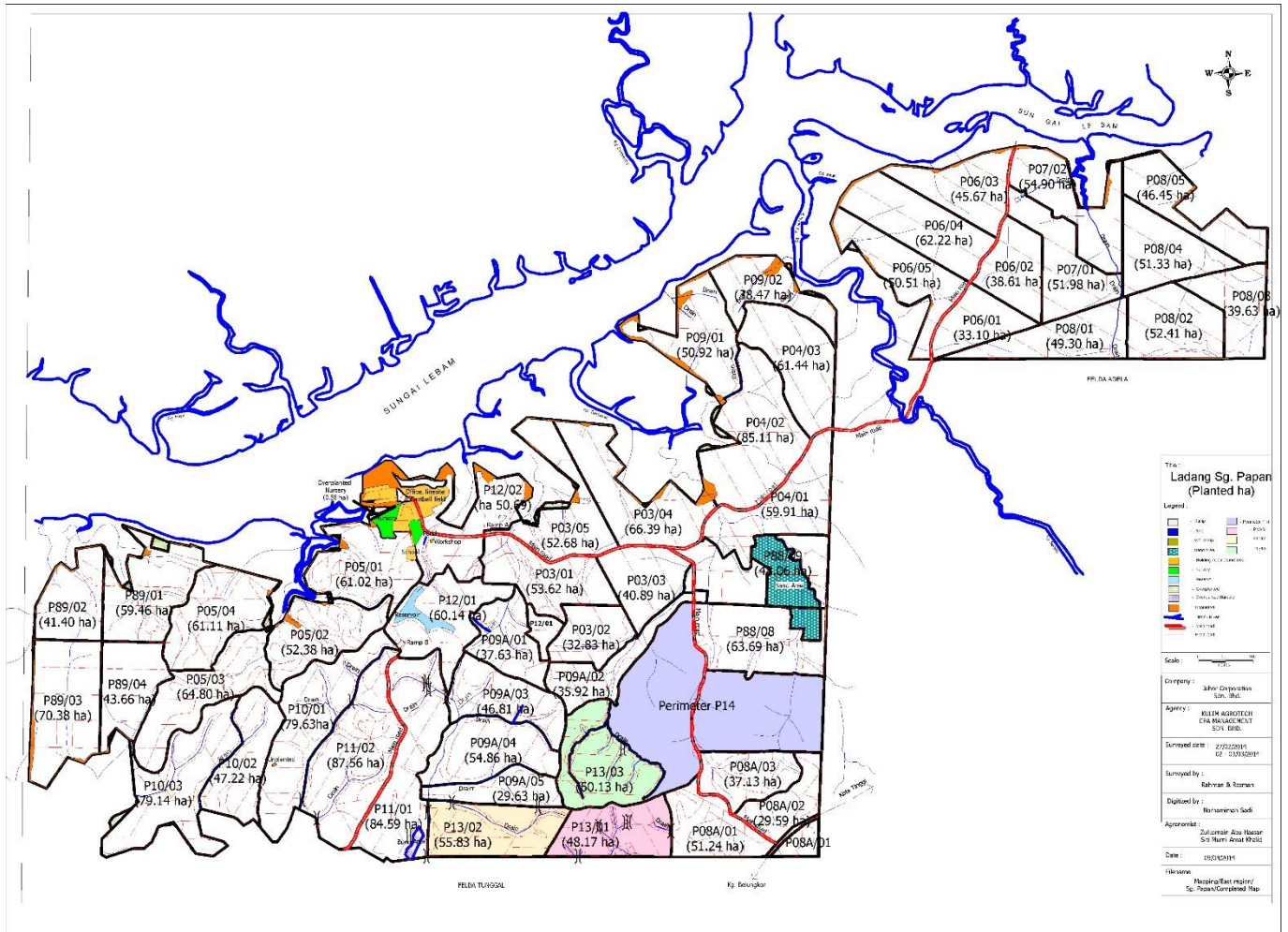


Appendix G: Sindora Estate Field Map

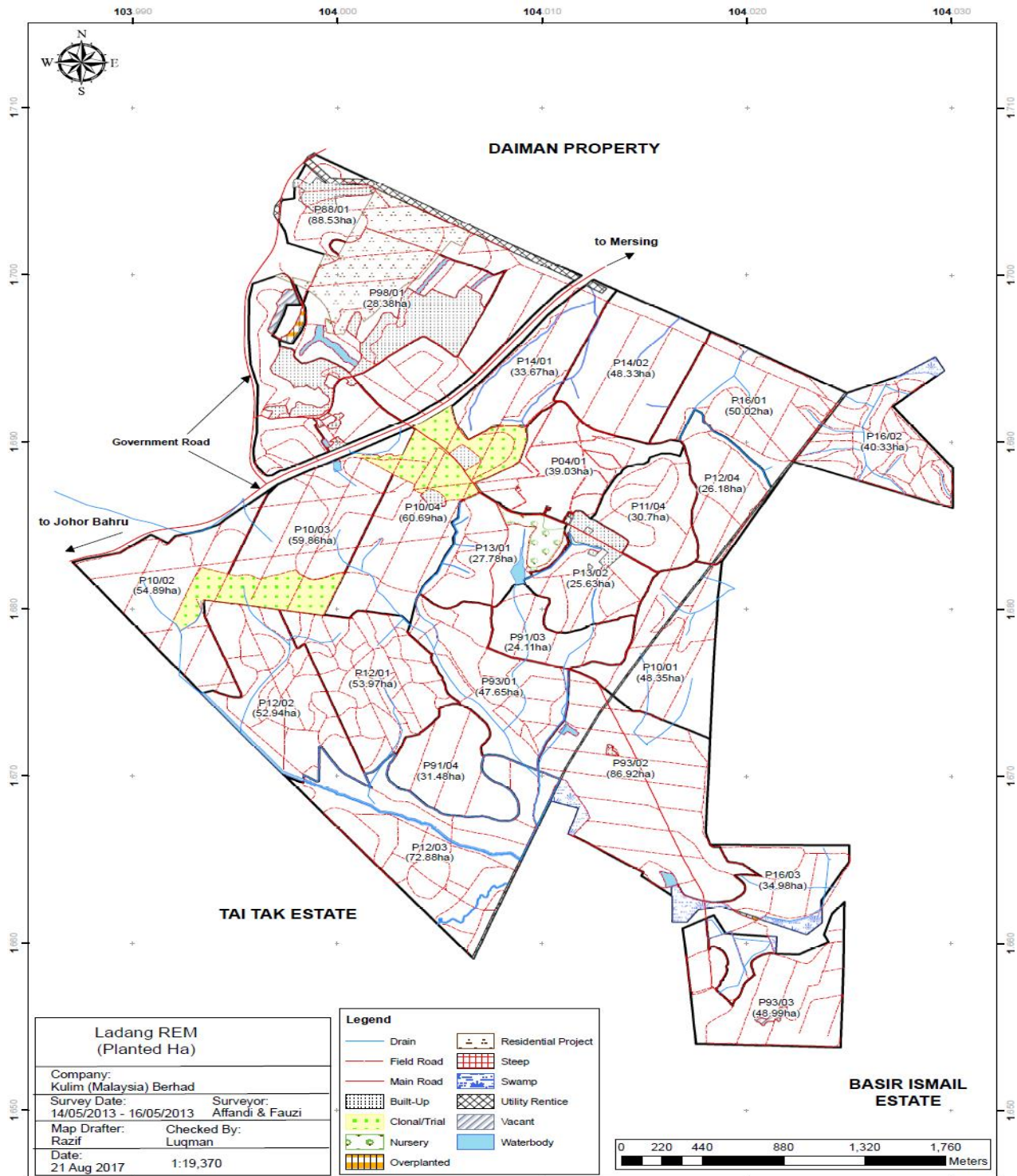


<p>Title: LADANG SINDORA (PLANTED) HA</p> <p>Company: MAHAMURAI PLANTATIONS SDN BHD</p>	<p>Legend:</p> <ul style="list-style-type: none"> Building /Compound Nursery Unplanted/germinable Swampy area Cleared area Sowing area Rubber field Pond Range Area Bk-Compound Area Canal area Fk- Rubber <p>Water sampling point</p> <ul style="list-style-type: none"> Field road Private road Drain <p>Scale: 0 75 150 meters</p>	<p>Surveyed by: AFFENDI & FAUZI</p> <p>Surveyed date: 25/09/2016 - 28/09/2016</p> <p>Digitized by: MOHAMAD RAFIZ WAHIDON</p>	<p>Checked by: LUOMAN MOHAMED</p> <p>Date: 17/10/2016</p> <p>File name: M:\Mapping\Central Region\ Sindora\Completed map</p>
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Appendix H: Sungai Papan Estate Field Map



Appendix I: REM Estate Field Map



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

NA

Appendix K: List of Abbreviations

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