

**RSPO PRINCIPLE AND CRITERIA –
 3rd ANNUAL SURVEILLANCE ASSESSMENT (ASA1_3)
 Public Summary Report**

| |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sime Darby Plantation Berhad |
| Client company Address: Level 3A, Main Block, Plantation Tower No, 2, Jalan PJU 1A/7 47301 Ara Damansara Selangor, Malaysia |
| Certification Unit: Strategic Operating Unit (SOU 4) Flemington Palm Oil Mill Location of Certification Unit: Sungai Sumun 36369 Teluk Intan Perak, Malaysia |

| TABLE of CONTENTS | Page No |
|----------------------------------------------------------------------------------------------------|----------------|
| Section 1: Scope of the Certification Assessment..... | 4 |
| 1. Company Details | 4 |
| 2. Certification Information | 4 |
| 3. Other Certifications..... | 4 |
| 4. Location(s) of Mill & Supply Bases | 5 |
| 5. Description of Supply Base | 5 |
| 6. Plantings & Cycle..... | 5 |
| 7. Certified Tonnage of FFB (Own Certified Scope) | 5 |
| 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *..... | 6 |
| 9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable | 6 |
| 10. Certified Tonnage | 7 |
| 11. Actual Sold Volume (CPO) | 7 |
| 12. Actual Sold Volume (PK) | 7 |
| 13. Actual Group certification Claims | 7 |
| Section 2: Assessment Process | 8 |
| 2.1 Assessment Methodology, Programme, Site Visits..... | 8 |
| 2.2 BSI Assessment Team: | 9 |
| 2.3 Assessment Plan | 11 |
| Section 3: Assessment Findings | 14 |
| 3.1 Normative requirement applied for this assessment:..... | 14 |
| 3.2 Time Bound Plan progress for multiple management units | 14 |
| 3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment) | 17 |
| 3.4 Details of findings | 18 |
| 3.4.1 Status of Nonconformities Previously Identified and Observations | 20 |
| 3.4.2 Summary of the Nonconformities and Status..... | 21 |
| Appendix A: Summary of Findings | 25 |
| Appendix B: Approved Time Bound Plan..... | 107 |
| Appendix C: GHG Reporting Executive Summary | 112 |
| Appendix D: General Chain of Custody Requirements for the Supply Chain..... | 114 |
| Appendix E : CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: Mass Balance) .. | 134 |
| Supply Chain Declaration (<i>Applicable For Appendix E</i>)..... | 141 |
| Appendix F: Location Map of Flemington Palm Oil Mill and Supply bases | 143 |

RSPO Public Summary Report
Revision 8 (Mar /2019)

Appendix G: Bagan Datoh Estate Field Map144

Appendix H: Sungai Samak Estate Field Map145

Appendix I: Flemington Estate Field Map.....146

Appendix J: Sabak Bernam Estate Field Map.....149

Appendix K: List of Smallholder Sampled (*If applicable – scheme/associated/group certification*)
.....150

Appendix L: List of Abbreviations151

Section 1: Scope of the Certification Assessment

| 1. Company Details | | | |
|---------------------------------------------|----------------------------------------------------------------------------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| RSPO Membership Number | 1-0008-04-000-00 | Membership Approval Date | 06/09/2004 |
| Parent Company Name | Sime Darby Plantation Berhad | | |
| Address | Level 3A, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia | | |
| Subsidiary (Certification Unit Name) | Strategic Operating Unit (SOU 4) – Flemington Palm Oil Mill | | |
| Address | Sungai Sumun 36369 Teluk Intan, Perak, Malaysia | | |
| Contact Name | Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr Azman Talkah (Mill Manager) | | |
| Website | www.simedarbyplantation.com | E-mail | shylaja.vasudevan@simedarbyplantation.com kks.flemington@simedarby.com |
| Telephone | +603-78484379 (Head Office) +603 8904729 (Mill) | Facsimile | +603 78484363 (Head Office) |

| 2. Certification Information | | | |
|-------------------------------|---------------------------------------------------------------------------------------------------------|------------------------------------|------------|
| Certificate Number | RSPO 590802 | Date of First Certification | 05/10/2011 |
| | | Certificate Start Date | 05/10/2016 |
| | | Certificate Expiry Date | 04/10/2021 |
| 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 |
| MSPO 682042 | MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4 | BSI Services Malaysia Sdn Bhd | 08/02/2023 |
| MSPO 690017 | MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3 | | |
| MSPO 714138 | MSPO Supply Chain Certification: 2018 | | 17/09/2024 |

RSPO Public Summary Report Revision 8 (Mar /2019)

| 4. Location(s) of Mill & Supply Bases | | | |
|---------------------------------------|--------------------------------------------------|-----------------|----------------|
| Name (Mill / Supply Base) | Location [Map Reference #] | GPS Coordinates | |
| | | Latitude | Longitude |
| Flemington Palm Oil Mill (60 mt/hr) | 36369 Sungai Sumun, Teluk Intan, Perak, Malaysia | 3° 55' 41" N | 100° 51' 26" E |
| Flemington Estate | 36369 Sungai Sumun, Teluk Intan, Perak, Malaysia | 3° 53' 28" N | 100° 52' 50" E |
| Bagan Datoh Estate | Bagan Datoh, 36100 Perak, Malaysia | 3° 59' 33" N | 100° 47' 24" E |
| Sungai Samak Estate | Ulu Bernam, 36500 Perak, Malaysia | 3° 44' 56" N | 101° 08' 51" E |
| Sabak Bernam Estate | 45307 Sabak Bernam, Selangor, Malaysia | 3° 45' 33" N | 101° 00' 24" E |

| 5. Description of Supply Base | | | | | |
|-------------------------------|----------------------------------------------|-------------|-----------------------------------|-----------------------|--------------|
| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| Flemington Estate | 1,792.92 | 7.38 | 177.66 | 1,977.96 | 90.64 |
| Bagan Datoh Estate | 3,605.49 | 2.00 | 174.37 | ¹ 3,781.86 | 95.34 |
| Sungai Samak Estate | 2,766.43 | 0.49 | ² 251.50 | 3,018.42 | 91.65 |
| Sabak Bernam Estate | 2,355.99 | 1.24 | 154.56 | ² 2,511.79 | 93.80 |
| Total | 10,520.83 | 11.11 | 758.09 | 11,290.03 | |

Note:

¹Total reduction of 99.02 ha compare to previous year due to acquisition by the government.

²Difference of 0.49 Ha compare to previous year due to correction of error.

| 6. Plantings & Cycle | | | | | | | |
|----------------------|-------------|----------|----------|---------|---------|----------|----------|
| Estate | Age (Years) | | | | | Mature | Immature |
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| Flemington Estate | 689.29 | 528.11 | 444.18 | 131.34 | - | 1,103.63 | 689.29 |
| Bagan Datoh Estate | 1,410.39 | 1,374.48 | 428.65 | 387.53 | 4.44 | 2,195.10 | 1,410.39 |
| Sungai Samak Estate | 286.43 | 826.90 | 1,653.10 | - | - | 2,480.00 | 286.43 |
| Sabak Bernam Estate | 928.38 | 886.21 | 182.21 | 359.19 | - | 1,427.61 | 928.38 |
| Total (ha) | 3,314.49 | 3,615.70 | 2,708.14 | 878.06 | 4.44 | 7,206.34 | 3,314.49 |

| 7. Certified Tonnage of FFB (Own Certified Scope) | |
|---------------------------------------------------|----------------|
| Estate | Tonnage / year |

RSPO Public Summary Report
Revision 8 (Mar /2019)

| | Estimated (Oct 2018-Sept 2019) | Actual (Aug 2018-June 2019) | Forecast (Oct 2019-Sept 2020) |
|--------------|-------------------------------------------|----------------------------------------|------------------------------------------|
| Flemington | 26,200.00 | 23,078.03 | 36,484.43 |
| Bagan Datoh | 61,322.00 | 60,599.51 | 77,861.58 |
| Sungai Samak | 71,131.66 | 59,638.81 | 84,592.87 |
| Sabak Bernam | 21,844.00 | 24,790.70 | 29,828.31 |
| Total | 180,497.66 | 168,107.05 | 228,767.18 |

*Total estimated FFB excluding the extended volume (FFB: 23,345 mt)

| 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable * | | | |
|-----------------------------------------------------------------------------------|-------------------------------------------|----------------------------------------|------------------------------------------|
| Estate | Tonnage / year | | |
| | Estimated (Oct 2018-Sept 2019) | Actual (Aug 2018-June 2019) | Forecast (Oct 2019-Sept 2020) |
| Sogomana | N/A | 2,669.84 | N/A |
| Sungai Wangi | | 3,752.90 | |
| Sabrang | | 1,786.83 | |
| Seri Intan | | 234.84 | |
| Total | | 8,444.41 | |

| 9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable | | | |
|-----------------------------------------------------------------------------------------------------|-------------------------------------------|----------------------------------------|------------------------------------------|
| Independent FFB Supplier | Tonnage / year | | |
| | Estimated (Oct 2018-Sept 2019) | Actual (Aug 2018-June 2019) | Forecast (Oct 2019-Sept 2020) |
| Bagan Pasir | 16,200.00 | 9,748.63 | 13,000.00 |
| Kuala Perak | 9,700.00 | 6,450.23 | 9,000.00 |
| Perniagaan Sinaran Mewah | 11,200.00 | 13,543.45 | 10,000.00 |
| Ban Boon Teng Sawit | 9,800.00 | 4,397.79 | 9,000.00 |
| Perniagaan Kelapa Sawit Hiap Thye | 10,101.00 | 8,240.22 | 8,500.00 |
| VR Plantation | 8,000.00 | 1,125.76 | 7,000.00 |
| Gan Kim Teik | - | 134.79 | - |
| Sawit Teluk Baru | - | 159.65 | - |
| Tan Hing | - | 10.17 | - |
| Sawit Berkat | - | 22.82 | - |

RSPO Public Summary Report Revision 8 (Mar /2019)

| | | | |
|---------------------|-----------|-----------|-----------|
| Syarikat Chuan Soon | - | 24.90 | - |
| Total | 46,900.00 | 43,858.41 | 41,000.00 |

| 10. Certified Tonnage | | | |
|------------------------------------|-----------------------------------|--------------------------------|----------------------------------|
| | Estimated (Oct 2018-Sept 2019) | Actual (Aug 2018-June 2019) | Forecast (Oct 2019-Sept 2020) |
| | FFB | FFB | FFB |
| Mill Capacity: 60 MT/hr | *203,842.66 mt | 176,551.46 mt | 228,767.18 mt |
| SCC Model: MB | CPO (OER: 20.50%) | CPO (OER: 20.26%) | CPO (OER: 21.70%) |
| | *42,302.02 mt | 35,770.89 mt | 49,642.50 mt |
| | PK (KER: 5.50%) | PK (KER: 5.21%) | PK (KER: 5.50%) |
| | *10,757.37 mt | 9,207.71 mt | 12,582.20 mt |

*including extended volume FFB: 23,345 mt, CPO: 5,300 mt & PK: 830 mt

| 11. Actual Sold Volume (CPO) (Aug 2018-June 2019) | | | | | |
|---------------------------------------------------|----------------|-------------------------|-----|--------------|--------------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| CPO (MT) | 0 | 0 | 0 | 35,399.05 mt | 35,399.05 mt |

| 12. Actual Sold Volume (PK) (Aug 2018-June 2019) | | | | | |
|--------------------------------------------------|----------------|-------------------------|-----|--------------|-------------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| PK (MT) | 400.00 mt | 0 | 0 | 8,807.55 mt | 9,207.55 mt |

| 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,
(ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29
The Gardens North Tower
Mid Valley City
Lingkaran Syed Putra
59200 Kuala Lumpur
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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 22-26/07/2019. 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

RSPO Public Summary Report
Revision 8 (Mar /2019)

the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

| Assessment Program | | | | | |
|--------------------------------------|-------------------------------------|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| Name (Mill / Supply Base) | Year 1 (Recertification) | Year 2 (ASA 1_1) | Year 3 (ASA 1_2) | Year 4 (ASA 1_3) | Year 5 (ASA 1_4) |
| Flemington Palm Oil Mill | √ | √ | √ | √ | √ |
| Flemington Estate | √ | | √ | √ | √ |
| Bagan Datoh Estate | √ | | √ | √ | √ |
| Sungai Samak Estate | | √ | √ | √ | √ |
| Sabak Bernam Estate | | √ | √ | √ | √ |

Tentative Date of Next Visit: 20 July 2020 – July 24, 2020

Total No. of Mandays: 16.0 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 |

RSPO Public Summary Report
Revision 8 (Mar /2019)

| | | |
|---------------------------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English. |
| Elzy Ovktafia | Team Member | She graduated from Universiti Putra Malaysia in Diploma of Agriculture while Licentiate Diploma and Advanced Diploma from the Incorporated Society of Planters. She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO and MSPO for more than 3 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for MSPO, RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015, ISO 14001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During assessment, she covers the legal issues, land use rights, stakeholder consultation, worker’s welfare and social issues. |
| Hu Ning Shing | Team Member | She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of Supply Chain She is fluent in Bahasa Malaysia and English languages. |
| Muhammad Masran Fadzli | Team Member | He graduated in Bachelor of Forestry Science at University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers’ welfare, workers’ occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He had accumulated auditing experience when he was the internal auditor for ISO9001 and ISO14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. During this assessment, he assessed on the aspects of environmental and estate best practise. He is fluent in Bahasa Malaysia and English languages. |

RSPO Public Summary Report
Revision 8 (Mar /2019)

Accompanying Persons:

| No. | Name | Role |
|-----|------|------|
| | Nil | |

2.3 Assessment Plan

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

| Date | Time | Subjects | VSH | MFM | EOC | HNS |
|-------------------------------------------------------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|-----|-----|
| Monday 22/7/2019 Flemington 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 | Flemington 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. | ✓ | ✓ | ✓ | - |
| | 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 | Break | | | | |
| | 1400-1630 | Flemington 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. | ✓ | ✓ | ✓ | - |
| | 1630-1700 | Interim closing briefing | | ✓ | ✓ | ✓ |
| Tuesday 23/7/2019 Bagan Datoh Estate | 0830-1300 | Bagan Datoh Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc. | ✓ | ✓ | ✓ | - |
| | 1000 - 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. | - | - | ✓ | - |

RSPO Public Summary Report
Revision 8 (Mar /2019)

| | | | | | | |
|----------------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|---|---|
| | 1300-1400 | Break | | | | |
| | 1400-1630 | Bagan Datoh 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 24/7/2019 Sungai Samak Estate | 0830-1300 | Sungai Samak Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc. | ✓ | ✓ | ✓ | - |
| | 1000 - 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 | Break | | | | |
| | 1400-1630 | Sungai Samak 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 25/7/2019 Sabak Bernam Estate | 0830-1300 | Sabak Bernam Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc. | ✓ | ✓ | ✓ | - |
| | 1000 - 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 | Break | | | | |
| | 1400-1530 | Sabak Bernam 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.). | ✓ | ✓ | ✓ | - |

RSPO Public Summary Report
Revision 8 (Mar /2019)

| | | | | | | |
|-----------------------------------------------------|--------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|---|
| | 1630-1700 | Interim closing briefing | ✓ | ✓ | ✓ | - |
| Friday 26/7/2019 Flemington Estate | 0830-1300 | Flemington Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc. | ✓ | ✓ | ✓ | - |
| | 1000 - 1200 | 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. | - | - | ✓ | - |
| | 1200-1430 | Break and Friday prayer | | | | |
| | 1430-1530 | Flemington 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.). | ✓ | ✓ | ✓ | - |
| | 1530-1630 | Verify any outstanding issues & preparation for closing meeting | ✓ | ✓ | ✓ | - |
| | 1630-1700 | Closing meeting | ✓ | ✓ | ✓ | - |
| | Friday 26/7/2019 Flimengton POM | 0830-1200 | Flemington POM RSPO Supply Chain Site visit: Incoming of FFB and outgoing of SPO & PK – 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. | - | - | - |
| 1200-1430 | | Break and Friday prayer | | | | |
| 1430-1530 | | Flemington POM RSPO Supply Chain Continue with outstanding elements | - | - | - | ✓ |
| 1530-1630 | | Verify any outstanding issues & preparation for closing meeting | - | - | - | ✓ |
| 1630-1700 | | Closing meeting | - | - | - | ✓ |

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Sime Darby Plantation Berhad Multiple Management Units / Time Bound Plan
- RSPO 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? | The time bound plan includes all SOUs in Malaysia and Indonesia. Malaysia - Effectively 34 SOUs: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. Indonesia - Effectively 25 SOUs. For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going. | Yes |
| Have all the estates and mills certified within five years after obtaining RSPO membership? | For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going. | 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. | In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different | Yes |

**RSPO Public Summary Report
Revision 8 (Mar /2019)**

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| | <p>entity/member under the RSPO and NBPOL is 100% RSPO Certified.</p> <p>*RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in completed. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.</p> <p>SDPL (Liberia Operation) has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put on-hold due to security & safety issue. After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.</p> | |
| <p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p> | <p>Sime Darby Plantation's time bound plan for certification is initially 3 years, starting 2008-2011. SDP has had all its SOUs (Malaysian & Indonesian) and all Malaysian SOUs have been RSPO certified including 2 new mills have been in Jan and Feb 2014.</p> <p>For Indonesian operations, currently, 1 SOU in Indonesia (PT MAS) is pending for RSPO Certification due to social legacy issues.</p> <p>SDP's is actively working on its certification targets given the span across a large geographical location and over 200 estates and mills in operation.</p> <p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes and a new oil mill in Liberia has been commissioned in Feb 2016.</p> <p>SDP's time bound plan has been revised to take into consideration the social challenges encountered in Indonesia for the remaining SOU (PT MAS) yet to be certified.</p> <p>Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter.</p> | <p>Yes</p> |

RSPO Public Summary Report
Revision 8 (Mar /2019)

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| | For Indonesia operation, the reported Case No: DSF 007 between the parties PT Mistra Austral Sejahtera (a subsidiary of Sime Darby Plantation Sdn Bhd) and Kerunang/Entapang community. New status has been updated for dispute tracker for following case, http://askrspo.force.com/Complaints/s/case/50090000028ErzsAAC/ . Case reference PreCAP/2012/06/PR . | |
| Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised | No lapses. | 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? | Up to date, there is no comment. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat. | Yes |
| Un-Certified Units or Holdings | | |
| No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. | HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011). | Yes |
| Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure. | A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audt was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 st quarter of 2019. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14? | 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 | Latest update based on RSPO Case Tracker (19 potential liabilities; 5 LUCA submitted, 1 LUCA is passed, 1 CN submitted, 1 CN approved) on LUCA submission stauts as per below table: | Yes |

**RSPO Public Summary Report
Revision 8 (Mar /2019)**

| <p>https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</p> | <p style="text-align: center;">SIME DARBY PLANTATION: LUCA SUBMISSION TIMELINE</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>PT/ Company</th> <th>Report Submission to RSPO</th> <th>Current Status (14 Aug 2018)</th> </tr> </thead> <tbody> <tr><td>1.</td><td>PT Lahan Tani Sakti</td><td>Submitted on 31 May 2017</td><td>LUCA approved by reviewer</td></tr> <tr><td>2.</td><td>PT Bina Sains Cemerlang</td><td>Submitted on 29 Sept 2017</td><td>Shapefiles submitted to RSPO</td></tr> <tr><td>3.</td><td>PT Swadaya Andika</td><td>Submitted on 6 Oct 2017</td><td>Shapefiles submitted to RSPO</td></tr> <tr><td>4.</td><td>PT Langgeng Muara Makmur</td><td>Submitted on 8 Dec 2017</td><td>Shapefiles submitted to RSPO</td></tr> <tr><td>5.</td><td>PT Laguna Mandiri</td><td>Submitted on 20 Dec 2017</td><td>Shapefiles submitted to RSPO</td></tr> <tr><td>6.</td><td>PT Kridatama Lancar</td><td>Submitted on 22 Sept 2017</td><td></td></tr> <tr><td>7.</td><td>PT Paripurna Swakarsa</td><td>Submitted on 29 Sept 2017</td><td></td></tr> <tr><td>8.</td><td>PT Sime Indo Agro</td><td>Submitted on 10 Nov 2017</td><td></td></tr> <tr><td>9.</td><td>PT Bhumireksa Nusa Sejati</td><td>Submitted on 12 Dec 2017</td><td></td></tr> <tr><td>10.</td><td>PT Budidaya Agro Lestari</td><td>Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017</td><td></td></tr> <tr><td>11.</td><td>PT Teguh Sempurna</td><td>Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017</td><td></td></tr> <tr><td>12.</td><td>PT Bahari Gembira Ria</td><td>Submitted on 29 Dec 2017</td><td rowspan="10">Shapefiles to be submitted to RSPO by 17 Aug 2018</td></tr> <tr><td>13.</td><td>PT Guthrie Pecconina Indonesia</td><td>Submitted on 29 Dec 2017</td></tr> <tr><td>14.</td><td>PT Sajang Heulang</td><td>Submitted on 29 Dec 2017</td></tr> <tr><td>15.</td><td>PT Bersama Sejahtera Sakti</td><td>Submitted on 29 Dec 2017</td></tr> <tr><td>16.</td><td>PT Tunggal Mitra Plantation</td><td>Submitted on 29 Dec 2017</td></tr> <tr><td>17.</td><td>PT Ladangrumpun Suburabadi</td><td>Submitted on 29 Dec 2017</td></tr> <tr><td>18.</td><td>PT Aneka Inti Persada</td><td>Submitted on 29 Dec 2017</td></tr> <tr><td>19.</td><td>PT Mitra Austral Sejahtera</td><td>Submitted on 29 Dec 2017</td></tr> </tbody> </table> <p>Note: SDP's LUCA is still in queue for review process pending finalization of the contract between RSPO and the reviewer. Sime Darby Plantation has also submitted its RSPO Compensation Plan (CP) for evaluation by RSPO.</p> | No. | PT/ Company | Report Submission to RSPO | Current Status (14 Aug 2018) | 1. | PT Lahan Tani Sakti | Submitted on 31 May 2017 | LUCA approved by reviewer | 2. | PT Bina Sains Cemerlang | Submitted on 29 Sept 2017 | Shapefiles submitted to RSPO | 3. | PT Swadaya Andika | Submitted on 6 Oct 2017 | Shapefiles submitted to RSPO | 4. | PT Langgeng Muara Makmur | Submitted on 8 Dec 2017 | Shapefiles submitted to RSPO | 5. | PT Laguna Mandiri | Submitted on 20 Dec 2017 | Shapefiles submitted to RSPO | 6. | PT Kridatama Lancar | Submitted on 22 Sept 2017 | | 7. | PT Paripurna Swakarsa | Submitted on 29 Sept 2017 | | 8. | PT Sime Indo Agro | Submitted on 10 Nov 2017 | | 9. | PT Bhumireksa Nusa Sejati | Submitted on 12 Dec 2017 | | 10. | PT Budidaya Agro Lestari | Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017 | | 11. | PT Teguh Sempurna | Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017 | | 12. | PT Bahari Gembira Ria | Submitted on 29 Dec 2017 | Shapefiles to be submitted to RSPO by 17 Aug 2018 | 13. | PT Guthrie Pecconina Indonesia | Submitted on 29 Dec 2017 | 14. | PT Sajang Heulang | Submitted on 29 Dec 2017 | 15. | PT Bersama Sejahtera Sakti | Submitted on 29 Dec 2017 | 16. | PT Tunggal Mitra Plantation | Submitted on 29 Dec 2017 | 17. | PT Ladangrumpun Suburabadi | Submitted on 29 Dec 2017 | 18. | PT Aneka Inti Persada | Submitted on 29 Dec 2017 | 19. | PT Mitra Austral Sejahtera | Submitted on 29 Dec 2017 | |
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| No. | PT/ Company | Report Submission to RSPO | Current Status (14 Aug 2018) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1. | PT Lahan Tani Sakti | Submitted on 31 May 2017 | LUCA approved by reviewer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2. | PT Bina Sains Cemerlang | Submitted on 29 Sept 2017 | Shapefiles submitted to RSPO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3. | PT Swadaya Andika | Submitted on 6 Oct 2017 | Shapefiles submitted to RSPO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4. | PT Langgeng Muara Makmur | Submitted on 8 Dec 2017 | Shapefiles submitted to RSPO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5. | PT Laguna Mandiri | Submitted on 20 Dec 2017 | Shapefiles submitted to RSPO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6. | PT Kridatama Lancar | Submitted on 22 Sept 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7. | PT Paripurna Swakarsa | Submitted on 29 Sept 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8. | PT Sime Indo Agro | Submitted on 10 Nov 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9. | PT Bhumireksa Nusa Sejati | Submitted on 12 Dec 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10. | PT Budidaya Agro Lestari | Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11. | PT Teguh Sempurna | Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12. | PT Bahari Gembira Ria | Submitted on 29 Dec 2017 | Shapefiles to be submitted to RSPO by 17 Aug 2018 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 13. | PT Guthrie Pecconina Indonesia | Submitted on 29 Dec 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 14. | PT Sajang Heulang | Submitted on 29 Dec 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15. | PT Bersama Sejahtera Sakti | Submitted on 29 Dec 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 16. | PT Tunggal Mitra Plantation | Submitted on 29 Dec 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 17. | PT Ladangrumpun Suburabadi | Submitted on 29 Dec 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 18. | PT Aneka Inti Persada | Submitted on 29 Dec 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 19. | PT Mitra Austral Sejahtera | Submitted on 29 Dec 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p> | <p>No stakeholder comments or complaints received.</p> | <p style="text-align: center;">Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p> | <p>None noted. No stakeholder comments or complaints received.</p> | <p style="text-align: center;">Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p> | <p>Yes. The uncertified management unit is referred to PT Mistra Austral Sejahtera which subject to RSPO Compliant Panel decision prior to certification. Refer to case reference PreCAP/2012/06/PR</p> | <p style="text-align: center;">Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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 |
| <p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p> | <p>Not applicable.</p> | |

RSPO Public Summary Report
Revision 8 (Mar /2019)

3.4 Details of findings

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

During the 3rd annual surveillance assessment there were one (1) Major nonconformity & one (1) Minor nonconformity raised. The Flemington Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

| Summary of Total Number of Nonconformity | | | |
|-------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|--------------------------|
| Nonconformity | | | |
| NCR Ref # | 1800010-201905-M1 | Clause & Category (Major / Minor) | RSPO SCCS 5.6.1 Major |
| Date Issued | 26/07/2019 | Due Date | 24/10/2019 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 17/09/2019 |
| Statement of Nonconformity: | Supply chain certificate number of the seller was not or incorrectly stated. | | |
| Requirement Reference: | The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including 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 | | |
| Objective Evidence: | For deliveries of palm kernel [ref.: contract # S/C-PSD/1903/PK0139] by trucks, it was found that there was no RSPO certificate number stated in some of the weighbridge tickets (W/B# 016150, 016151, 016155, 016156, 016163, 016165, 016170 and 016169). Apart from that, the other deliveries (W/B# 016116, 016128, 016129, 016133 and 016135), it was MSPO certificate number (MSPO 682042) that was stated instead of RSPO certificate number. | | |
| Corrections: | Make amendment the weighbridge ticket for the mill and buyers record. | | |
| Root Cause Analysis: | Weighbridge computer system not updated after validation period expired during conversion IP mill to MB mill on 2018. | | |
| Corrective Actions: | Update master certification in weighbridge system and give training to the respective weighbridge operator. | | |
| Assessment Conclusion: | Document reviewed: 1. All the corrected RSPO certificate number in weighbridge tickets as per objective evidences. | | |

RSPO Public Summary Report
Revision 8 (Mar /2019)

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| | <p>2. Latest weighbridge ticket no: 017103, 017105, 017107, 017108, 017104 on 14/09/2019.</p> <p>3. The RSPO SCCS Training to all 6 people includes weighbridge operator, technical operator, QA clerk and Account/Admin Officer on 19/08/2019.</p> <p>4. SDP-Weigh Mill – master certification updated to RSPO certificate number (RSPO 590802).</p> <p>5. Interview with the training participants on the awareness of RSPO SCC and its implementation</p> <p>Corrective action is found to be effective, thus the major NC was closed on 17/09/2019 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.</p> |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| Summary of Total Number of Nonconformity | | | |
|-------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|-------------------------------------|
| Nonconformity | | | |
| NCR Ref # | 1800010-201905-N1 | Clause & Category (Major / Minor) | Indicator 2.1.3 |
| Date Issued | 26/07/2019 | Due Date | Next annual surveillance assessment |
| Closed (Yes / No) | No | Date of nonconformity Closure | "Open" |
| Statement of Nonconformity: | The mechanism to ensure compliance with relevant legal requirement was not effectively demonstrated. | | |
| Requirement Reference: | A mechanism for ensuring compliance shall be implemented. | | |
| Objective Evidence: | At Sabak Bernam Estate, there was no clear mechanism to check whether or not the deduction of pay as a penalty for leaving FFB in the field, complies with legal requirement [ref.: Payslip for a worker (ID No: 106625) for June 2019]. | | |
| Corrections: | <p>1) To ensure harvesting staff reports the correct input based on the actual number of bunches the worker have completed. Daily bunches recorded by staff would be displayed and brief bunches monitoring board at muster ground. Harvester would verified their respective bunch counts before bunches entered to the daily input.</p> <p>2) Immediately stops worker deduction.</p> | | |
| Root Cause Analysis: | Workers failed to complete the tasks assigned to them causing management to employ other workers to complete the task. | | |
| Corrective Actions: | <p>1) Field staff need to do the reconciliation process daily and the input form must be verify by assistant.</p> <p>2) The workers that found guilty will be given warning letter, repetitive mistake would be penalize by deducting bunches for his assigned task.</p> <p>3) The deducted bunches would be recovered by another worker.</p> | | |
| Assessment Conclusion: | The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment. | | |

| Opportunity for Improvements | |
|-------------------------------------|--------------------|
| OFI # | Description |

| | |
|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| OFI 1 | 18100010-201905-I1 |
| | <p>Indicator 5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.</p> <p>Details: The disposal of solid wastes to the Teluk Intan Municipal Council's landfill can be further improved by minimizing the recyclable wastes.</p> |

| Positive Findings | |
|-------------------|-------------|
| PF # | Description |
| PF 1 | |

3.4.1 Status of Nonconformities Previously Identified and Observations

| Non-Conformity | | | |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|--------------------------|
| NCR Ref # | 1671687-201805-N1 | Clause & Category (Major / Minor) | Indicator 4.8.2 Minor |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 26/07/2019 |
| Statement of Nonconformity: | The training on new changes in pesticides application (eg: spraying technique and PPE usage) was not fully implemented. | | |
| Requirement Reference: | Records of training for each employee shall be maintained. | | |
| Objective Evidence: | Flemington Estate (site visit at field P16B): The sprayers did not understand the proper maintenance and handling for the Respirator given to them (upgraded to implement 3M half face Respirator from N95 particulate respirator). Noted that they are no training provided regarding the usage of new type of Respirator to the sprayers. Sample workers are as follow: 1. Employee ID: 21281 2. Employee ID: 121794 3. Employee ID: 121793 | | |
| Corrective Actions: | 1. To check PPE compliance (SOP / PPE matrix / recommendation in CHRA) during visit to OUs by SQM team. 2. Add hoc visit during morning muster to selected OU to check on compliance issue. | | |
| Assessment Conclusion: | During this surveillance assessment, it was found that there is no overtime offered in rest day at Sungei Samak Estate. Sampled the pay slip for month February, April and June 2019 for worker below: 1. Surono (ID: 63497) – SSE 2. Khalasi Almach (ID: 102230) – SSE 3. Purkait Lutfor (ID: 76912) – SSE 4. Abubacker Jamal Mydeen (ID: 76919)– SSE 5. Kumar (ID: 139263) – SSE Interviewed with workers confirmed that there was no overtime in rest day offered and if required, they will be paid double rate. Thus, the non-conformity closure has been found to be effectively implemented. | | |

3.4.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Major / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|-------------------|--------------------------|---------------|-------------|--------------------------|
| 1365885M1 | Major | SCCS D4.2 | 18/8/2016 | Closed out on 16/09/2016 |
| 1365885M2 | Major | 7.3.2 | 18/8/2016 | Closed out on 12/10/2016 |
| 1365885M3 | Major | 2.1.1 | 18/8/2016 | Closed out on 12/10/2016 |
| 1365885M4 | Major | 6.5.2 | 18/8/2016 | Closed out on 12/10/2016 |
| 1365885N1 | Minor | 4.7.6 | 18/8/2016 | Closed out on 27/07/2017 |
| 1503700-201707-M1 | Major | 6.5.1 | 21/07/2017 | Closed out on 26/09/2017 |
| 1503700-201707-N1 | Minor | 5.3.3 | 21/07/2017 | Closed out on 17/08/2018 |
| 1503700-201707-N2 | Minor | 4.7.3 | 21/07/2017 | Closed out on 17/08/2018 |
| 1671687-201805-M1 | Major | 2.1.1 | 17/08/2018 | Closed out on 09/11/2018 |
| 1671687-201805-N1 | Minor | 4.8.2 | 17/08/2018 | Closed out on 17/09/2019 |
| 1800010-201905-M1 | Major | SCCS 5.6.1 | 26/07/2019 | Closed out on 17/09/2019 |
| 1800010-201905-N1 | Minor | 2.1.3 | 26/07/2019 | "Open" |

3.5. Stakeholders Consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Flemington Palm Oil Mill Certification Unit’s (SOU 2) environmental and social performance, legal and any known dispute issues.

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

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

| List of Stakeholders Contacted | |
|-----------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Internal Stakeholders Field workers Mill workers NUPW representative Gender committee General workers | Union/Contractors/Local Communities Perniagaan Kelapa Sawit Hiap Thye Ladang Kuala Perak MPKK Tanah Lalang MPKK Sg Dulung Dalam M Rajan Contractor Kg Kebun Sayur |

RSPO Public Summary Report
Revision 8 (Mar /2019)

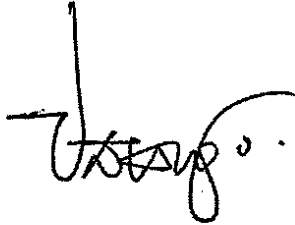
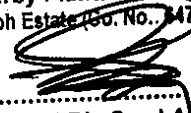
| | |
|--------------------------------------------------------------------|-------------------|
| | |
| Government Departments School (SJK(T) Ladang New Coconut | NGO Nil |

| IS # | Description |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <p>Feedbacks: <u>SJK(T) Ladang New Coconut & SJK(T) Flemington</u> There is no complaint from school management to Sime Darby management. Previously during the stakeholder meeting, there were 2 request from SJK(T) Ladang New Coconut to Sime Darby which were road repair and build the school car porch. The status of road repair already completed while car porch is not yet. Other than that, school also receive contribution from estate/mill for sports day. For SJK(T) Flemington, there were a comment on the estate football field next to the school building is not in even and levelled for any sport use.</p> <p>Management Responses: Noted on the information and will follow up the status of car porch and update during the stakeholder meeting. Since there is no formal request been made from SJK(T) Flemington, no action been taken. However, estate management will discuss this issue in the next stakeholder meeting.</p> <p>Audit Team Findings: No other issue. Will verify in the next surveillance assessment.</p> |
| 2 | <p>Feedbacks: <u>FFB Dealer (Perniagaan Kelapa Sawit Hiap Thye)</u> Dealer has sent their FFB to Flemington POM and Perak Motor almost every day. They also have own transport to send the FFB to mill. Agreement signed by both party and still valid while payment for the works are paid accordingly within the timeframe. The representative from the Perniagaan Kelapa Sawit Hiap Thye attended the stakeholder meeting conducted by both Flemington POM and Flemington Estate.</p> <p>Management Responses: Noted on the information</p> <p>Audit Team Findings: No other issue.</p> |
| 3 | <p>Feedbacks: <u>Neighbouring estate (Ladang Kuala Perak)</u> Ladang Kuala Perak just completed their MSPO audit and they aware on the complaint procedure to Sime Darby management. Their location is just next to Flemington Estate and so far no dispute reported.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No other issue.</p> |
| 4 | <p>Feedbacks: <u>Communities (Kampung Tanah Lalang, Kampung Sg. Dulang, Kampung Kebun Sayur)</u> No land dispute issue between villagers and Sime Darby. They were invited and attended the previous stakeholder meeting to share any feedback. Some issue such as safety and health, MSPO & RSPO introduction and other issue.</p> <p>Management Responses: All the issue has been incorporated in the Social Impact Assessment (SIA) plan accordingly.</p> <p>Audit Team Findings: Verified the SIA plan with the person in charge and completion status. No other issue.</p> |
| 5 | <p>Feedbacks: <u>Trade union representatives (NUPW) & Worker Representative</u></p> |

RSPO Public Summary Report
Revision 8 (Mar /2019)

| | |
|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>Overtime and salary were paid as per MAPA/NUPW and comply with the Minimum Wage Order 2016. Only one concern from worker which is the condition of Surau is bad due to non-muslim use the ablution place for toilet.</p> <p>Management Responses: Since this is a sensitive case which involve religion and race, management will investigate privately and solve this issue internally with their workers.</p> <p>Audit Team Findings: Noted and will verify in the next surveillance assessment.</p> |
| <p>6</p> | <p>Feedbacks: <u>Contractor (M. Rajan Contractor)</u> Agreement signed by both party and still valid while payment for the works are paid accordingly within the timeframe. Contractor was aware on the requirement for CB to access/audit contractor when required. The contractor has suggestion for the effective time for grass cutting works to be done in twice a month especially before audit time.</p> <p>Management Responses: Noted on the suggestion and will have further discussion with the contractor.</p> <p>Audit Team Findings: No other issue. Will verify in the next surveillance assessment.</p> |
| <p>7</p> | <p>Feedbacks: <u>Gender Committee Representative</u> Gender committee meeting was actively held in 3 months' basis in each operating unit. Activities such as gotong-royong and exercise were conducted involving the female workers and wife of workers. So far, no sexual harassment or domestic violence case reported.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No other issue.</p> |

**RSPO Public Summary Report
Revision 8 (Mar /2019)**

| Formal Signing-off of Assessment Conclusion and Recommendation | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The audit objectives have been achieved and the certification scope remains appropriate. Based on the results of this audit, it is concluded that Flemington Palm Oil Mill Certification Unit has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Flemington Palm Oil Mill Certification Unit is approved & continued.</p> | |
| Report prepared by | Acceptance of Assessment Conclusion |
| <p>Name: Valence Shern</p> | <p>Name: <i>Syed Muhammad Syed Abu Bakar</i></p> |
| <p>Company Name: BSI Services Malaysia Sdn Bhd</p> | <p>Company Name: Sime Darby Plantation Berhad</p> |
| <p>Title: Lead auditor</p> | <p>Title: SOU Chairman</p> |
| <p>Signature:</p>  | <p>Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking of holding certification, agree with the contents of this report and accept the liability</i></p> <p>Sime Darby Plantation Berhad Bagan Datoh Estate (No. No. 147/66-V)</p>  <p>..... Syed Muhammad Bin Syed Abu Bakar Manager</p> |
| <p>Date: 11/11/2019</p> | <p>Date: 13/11/19</p> |

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 - | Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Requests for information from the Regulatory Department such as DOE quarterly reports were attended and no noncompliance or complaints observed. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. Publicly available documents such as land title, OSH plan, HCV documents, negotiation procedure, complaint records, RSPO public summary reports, EIA, Management Plans & Continuous Improvement Plans and company policies are available. Sime Darby has published its sustainable policies, annual report and Code of Business Conduct in the Sime Darby Plantation Berhad website. http://www.simedarbyplantation.com/corporate ; http://www.simedarbyplantation.com/sustainability/beliefs-progress/governance/sustainability-policies | Complied |
| 1.1.2 | Records of requests for information and responses shall be maintained. -Major compliance | The procedure for handling request for information is stated in Section 3 – Documentation and Communication of the Plantation Quality Management System Manual dated 01/11/2008. Ever since the last assessment, there was no request for information to the mill and sampled estates from relevant stakeholders. | Complied |

| Criterion / Indicator | Assessment Findings | Compliance | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| 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. | | | |
| 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 was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Sime Darby Plantations Sdn Bhd continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available through Sime Darby Plantations Sdn. Bhd. website as following link: http://www.simedarbyplantation.com/sustainability/beliefsprogress/human-rights/labour-standards/grievancemechanisms Sample of the documents that were made available for viewing are: <ul style="list-style-type: none"> • Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register • Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI • Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EI | Complied |
| Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions. | | | |

| Criterion / Indicator | Assessment Findings | Compliance |
|------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.3.1 | <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p> | <p>Sime Darby Plantations Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. Briefing of policy was given to the all the workers on 24/06/2019 in Flemington POM includes the shift A, shift B, contractors, daily gang and workshop. In Bagan Datuk Estate, the COBC training was conducted on 07/02/2019, Sg Samak Estate on 26/02/2019, Sabak Bernam Estate on 29/06/2019 and Flemington Estate on 17/07/2019 to all workers.</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> | | |

| Criterion / Indicator | Assessment Findings | Compliance |
|--------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance - | SOU4 had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and PSQM sustainability team. SOU4 had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were: <ul style="list-style-type: none"> • UPV permit #PK PMT 3646, expire on 8/4/2020 at Bagan Datoh Estate • Diesel storage permit #A035967, expire 4/11/2019 at Bagan Datoh Estate • Weighbridge calibration certificate #B1298750, dated 1/2/2019 at Bagan Datoh Estate • MPOB license #525521002000, Bagan Datoh Estate, area: 3,618.55 Ha, expire 31/12/2019 • Labour Department Permit for salary deduction (Ref no: BHG.PU/9/129 JLD 33 (53)) dated 06.07.2017 for electricity bill for Sime Darby Plantation Sdn Bhd. • Labour Department Permit for salary deduction (Ref no: (12) dlm PMT10000/2011/0184 dated 07.06.2012 for Flemington Estate. • Labour Department Permit for overtime limit for 130 hours per months (Ref no: BHG.PU/9/134 JLD 9 (11) dated 27.03.2017 for Sime Darby Plantation Sdn Bhd. | Complied |
| 2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance - | The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that are applicable to the CU operation. Each office of the operating unit (mill and estates) has its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance and it can be accessed by all levels of staff. Among the applicable legal laws registered are EQA, Occupational, Safety and Health Act, Factory & Machinery Act, Labour Act, Pesticides Act, Workers' Minimum Standard of Housing and Amenities Act, to name a few. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| 2.1.3 | A mechanism for ensuring compliance shall be implemented. - Minor compliance - | The applicable legal requirements registered in the LORR. Periodically, the CU assigned its personnel to cross check the status of compliance against the LORR through various ways such as internal audit, routine inspections, etc. Whenever there is non-compliance detected, appropriate actions will be taken to address the issue. However, at Sabak Bernam Estate, there was no clear mechanism to check whether or not the deduction of pay as a penalty for leaving FFB in the field, complies with legal requirement [ref.: Payslip for a worker (ID No: 106625) for June 2019]. Thus a non-conformity report was assigned due to this lapse. | Minor nonconformance |
| 2.1.4 | A system for tracking any changes in the law shall be implemented. - Minor compliance - | A special department (PSQM) which is based in Kuala Lumpur was responsible in tracking the changes to the Acts and Regulations in their legal register by communicating with the publisher of the documents. This mechanism was outlined in its procedure. The revision of the legal register was done from time to time and shall there be any update, it would be communicated to the respective CUs. Among the newly registered legal requirements since the last assessment were: <ul style="list-style-type: none"> • Minimum Wage Order, Amendment 2018 • Fire Services Act 1988 (Act 341) Amendment 2018 • Employees Social Security Act 1669 (Act 4) • Employment Insurance System Act 2017 • Children and Young Persons (Employment) Act 1966 • Food Act 1983 • Police Act 1967 • Land Acquisition Act 1960 | Complied |
| Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights. | | | |

| <p>2.2.1</p> | <p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -</p> | <p>Sime Darby acquired (freehold and leased) all the land directly from the state of Perak and Selangor government. There were no issues of land disputes recorded. All land title were kept in the office and available for review.</p> <p><u>BDE</u> The estate hold 67 land title in 2019 compared to 63 land title in 2018 due to few land titles been divided into individual title. The quit rent payment was done accordingly as requirement from the state government. Sighted the payment advice for FY 2019 available for review. Sighted the sampled land titles as follow:</p> <table border="1" data-bbox="981 715 1697 1010"> <thead> <tr> <th>Grant No.</th> <th>Lot no</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>GRN 00047095</td> <td>0001775</td> <td>268.2733</td> </tr> <tr> <td>GRN 00056081</td> <td>0003243</td> <td>258.7961</td> </tr> <tr> <td>GRN 00001512</td> <td>0004019</td> <td>469.4346</td> </tr> <tr> <td>GRN 178969</td> <td>0002454</td> <td>73.6782</td> </tr> </tbody> </table> <p><u>SSE</u> The estate holds 11 land titles. The quit rent payment was done accordingly as requirement from the state government. Sighted the payment advice for FY 2019 available for review. Sighted the sampled land titles as follow:</p> <table border="1" data-bbox="981 1173 1697 1342"> <thead> <tr> <th>Grant No.</th> <th>Lot no</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>GRN 47177</td> <td>4189</td> <td>1137.1067</td> </tr> <tr> <td>GRN 47643</td> <td>4358</td> <td>84.7309</td> </tr> </tbody> </table> | Grant No. | Lot no | Hectare | GRN 00047095 | 0001775 | 268.2733 | GRN 00056081 | 0003243 | 258.7961 | GRN 00001512 | 0004019 | 469.4346 | GRN 178969 | 0002454 | 73.6782 | Grant No. | Lot no | Hectare | GRN 47177 | 4189 | 1137.1067 | GRN 47643 | 4358 | 84.7309 | <p>Complied</p> |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|--------|---------|--------------|---------|----------|--------------|---------|----------|--------------|---------|----------|------------|---------|---------|-----------|--------|---------|-----------|------|-----------|-----------|------|---------|-----------------|
| Grant No. | Lot no | Hectare | | | | | | | | | | | | | | | | | | | | | | | | | |
| GRN 00047095 | 0001775 | 268.2733 | | | | | | | | | | | | | | | | | | | | | | | | | |
| GRN 00056081 | 0003243 | 258.7961 | | | | | | | | | | | | | | | | | | | | | | | | | |
| GRN 00001512 | 0004019 | 469.4346 | | | | | | | | | | | | | | | | | | | | | | | | | |
| GRN 178969 | 0002454 | 73.6782 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Grant No. | Lot no | Hectare | | | | | | | | | | | | | | | | | | | | | | | | | |
| GRN 47177 | 4189 | 1137.1067 | | | | | | | | | | | | | | | | | | | | | | | | | |
| GRN 47643 | 4358 | 84.7309 | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | Leased: 151231 | 4359 | 37.5345 | | | | | | | | | | | | | | | | |
|--------------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|----------|--|-----------|--------|---------|--------------|------|---------|--------------|------|----------|--------------|------|----------|--------------|------|---------|
| | | GRN 48658 | 4597 | 335.0792 | | | | | | | | | | | | | | | | |
| | | <p><u>SBE</u> The estate holds 7 land titles. The quit rent payment was done accordingly as requirement from the state government. Sighted the payment advice for FY 2019 available for review. Sighted the sampled land titles as follow:</p> <table border="1"> <thead> <tr> <th>Grant No.</th> <th>Lot no</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>GRN 51816</td> <td>2096</td> <td>35.0178</td> </tr> <tr> <td>GRN 45208</td> <td>2095</td> <td>504.0364</td> </tr> <tr> <td>GRN 29597</td> <td>1</td> <td>2023.425</td> </tr> <tr> <td>GRN 298976</td> <td>2097</td> <td>86.9599</td> </tr> </tbody> </table> | | | | Grant No. | Lot no | Hectare | GRN 51816 | 2096 | 35.0178 | GRN 45208 | 2095 | 504.0364 | GRN 29597 | 1 | 2023.425 | GRN 298976 | 2097 | 86.9599 |
| Grant No. | Lot no | Hectare | | | | | | | | | | | | | | | | | | |
| GRN 51816 | 2096 | 35.0178 | | | | | | | | | | | | | | | | | | |
| GRN 45208 | 2095 | 504.0364 | | | | | | | | | | | | | | | | | | |
| GRN 29597 | 1 | 2023.425 | | | | | | | | | | | | | | | | | | |
| GRN 298976 | 2097 | 86.9599 | | | | | | | | | | | | | | | | | | |
| | | <p><u>FLE</u> The estate holds 7 land titles. The quit rent payment was done accordingly as requirement from the state government. Sighted the payment advice for FY 2019 available for review. Sighted the sampled land titles as follow:</p> <table border="1"> <thead> <tr> <th>Grant No.</th> <th>Lot no</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>GRN 00105018</td> <td>5435</td> <td>260.60</td> </tr> <tr> <td>GRN 00047176</td> <td>2447</td> <td>33.7356</td> </tr> <tr> <td>GRN 00141481</td> <td>5138</td> <td>446.4</td> </tr> <tr> <td>GRN 00141507</td> <td>5827</td> <td>211.3</td> </tr> </tbody> </table> | | | | Grant No. | Lot no | Hectare | GRN 00105018 | 5435 | 260.60 | GRN 00047176 | 2447 | 33.7356 | GRN 00141481 | 5138 | 446.4 | GRN 00141507 | 5827 | 211.3 |
| Grant No. | Lot no | Hectare | | | | | | | | | | | | | | | | | | |
| GRN 00105018 | 5435 | 260.60 | | | | | | | | | | | | | | | | | | |
| GRN 00047176 | 2447 | 33.7356 | | | | | | | | | | | | | | | | | | |
| GRN 00141481 | 5138 | 446.4 | | | | | | | | | | | | | | | | | | |
| GRN 00141507 | 5827 | 211.3 | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | Assessment Findings | Compliance |
|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| <p>2.2.2</p> <p>Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -</p> | <p>During site visit in all sampled estates, observed the legal boundary are clearly demarcated and visibly maintain. Boundary with village, school and small holders around the estate are separated with physical boundary such as trenches and bund.</p> <p><u>BDE</u> Observed that the legal boundaries was clearly demarcated and visibly maintained during the site visit. Boundary markers with red and white colour wooden pole can be observed at 15E adjacent to Perumahan Awam. The boundary along the estate was also separated with trenches.</p> <p><u>SSE</u> Observed during site visit at Yew Lian div. at field P08S, adjacent to Kg. Sg. Samak and P02E adjacent to Mazuin Estate, the legal boundary was clearly demarcated with security trenches.</p> <p><u>SBE</u> Observed during site visit at P18E adjacent with PPRT Parit 6, the legal boundary was clearly demarcated with security trenches and red and white concrete pole.</p> <p><u>FLE</u> Observed that the legal boundaries was clearly demarcated and visibly maintained during site visit at Teluk Buluh Division. Field P08A and P08C adjacent to smallholders with boundary markers is visibly maintain with security trenches.</p> | <p>Complied</p> |

| Criterion / Indicator | | Assessment Findings | Compliance |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 2.2.3 | Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance - | There is no land dispute in SOU 4 Flemington certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighboring villagers confirmed that no encroachment of land by the company. | Complied |
| 2.2.4 | There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance | There is no land dispute in SOU 4 Flemington certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighboring villagers confirmed that no encroachment of land by the company. | Complied |
| 2.2.5 | For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance | There is no land dispute in SOU 4 Flemington certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighboring villagers confirmed that no encroachment of land by the company. | Complied |
| 2.2.6 | To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance | There is no land dispute in SOU 4 Flemington certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighboring villagers confirmed that no encroachment of land by the company. | Complied |
| Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent. | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 2.3.1 | Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance - | There is no land dispute in SOU 4 Flemington certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighboring villagers confirmed that no encroachment of land by the company. Trenches and gate were constructed to demarcate the boundary. | Complied |
| 2.3.2 | Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance - | There is no land dispute in SOU 4 Flemington certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighboring villagers confirmed that no encroachment of land by the company. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| 2.3.3 | All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance | There is no land dispute in SOU 4 Flemington certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighboring villagers confirmed that no encroachment of land by the company. | Complied |
| 2.3.4 | Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance | There is no land dispute in SOU 4 Flemington certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighboring villagers confirmed that no encroachment of land by the company. | 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. | | | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| <p>3.1.1</p> <p>A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -</p> | <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER, and KER, OPEX, CAPEX etc. Flemington Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year. Sighted the sampled CAPEX FY 2019 as follows:</p> <p><u>FPOM</u></p> <ul style="list-style-type: none"> i. 1 unit 45 mt/hr boiler c/w ancillary work and dust collector ii. 1 unit turbine wheel replacement. <p><u>BDE</u></p> <ul style="list-style-type: none"> i. Kubota c/w double rear tyres ii. Passenger trailer 18 seater iii.. 5 ton wooden non-tipping trailer <p><u>SBE</u></p> <ul style="list-style-type: none"> i. Air Blast Sprayer RB600 Liter ii. Rotary Slasher iii. Husqvarna palm Cut <p><u>FLE</u></p> <ul style="list-style-type: none"> i. 1 units Mechanical Buffalo Badang L100 sprayer ii. 1 unit Sime Kubota c/w double rear tyre iii. 1 Hiab Grabber c/w external tank system | <p>Complied</p> |

RSPO Public Summary Report
Revision 8 (Mar /2019)

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | |
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| 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 - | <p>SOU4 estates have long range replanting program until 36/37. Replanting is planned for tall palm and older than 25 years old as well as Ganoderma infected palms.</p> <p>Sighted the latest review of the LRRP replanting program FY 2020 – 2024 as per email dated 19/7/2019 by Plantation Upstream Malaysia.</p> <table border="1"> <thead> <tr> <th></th> <th>BDE</th> <th>SSE</th> <th>SBE</th> <th>FLE</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>322.73</td> <td>0.00</td> <td>279.16</td> <td>72.18</td> </tr> <tr> <td>2021</td> <td>0.00</td> <td>0.00</td> <td>163.53</td> <td>59.16</td> </tr> <tr> <td>2022</td> <td>200.51</td> <td>195.13</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table> | | BDE | SSE | SBE | FLE | 2020 | 322.73 | 0.00 | 279.16 | 72.18 | 2021 | 0.00 | 0.00 | 163.53 | 59.16 | 2022 | 200.51 | 195.13 | 0.00 | 0.00 | Complied |
| | BDE | SSE | SBE | FLE | | | | | | | | | | | | | | | | | | | |
| 2020 | 322.73 | 0.00 | 279.16 | 72.18 | | | | | | | | | | | | | | | | | | | |
| 2021 | 0.00 | 0.00 | 163.53 | 59.16 | | | | | | | | | | | | | | | | | | | |
| 2022 | 200.51 | 195.13 | 0.00 | 0.00 | | | | | | | | | | | | | | | | | | | |
| <p>Principle 4: Use of appropriate best practices by growers and millers</p> <p>Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.</p> | | | | | | | | | | | | | | | | | | | | | | | |
| 4.1.1 | Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance - | <p>SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc. Noted updated procedure under SOP for water analysis and RSPO SCCS procedure:</p> <p>i)SPMS, Appendix 7: SOP for water quality monitoring, issue:2 dated 1/6/16. SOP for sampling guideline ii)Water and Wastewater Sampling Guideline, issue:1 dated 1/6/16. iii) RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version:2, issue: 2 dated October 2016.</p> | Complied | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| 4.1.2 | A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance - | <p>Sime Darby has established a system to monitor the mill and estate operation. The Structured Oil Recovery Assessment (SORA) (for Mill) / Structured Crop Recovery Assessment (SCRA) (for estates) and Planning and Monitoring Unit visited the operating units quarterly. Their reports covers on all aspect of operation. In addition, visit by agronomist was made yearly.</p> <p>GSQM inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.</p> | Complied |

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| <p>4.1.3</p> | <p>Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -</p> | <p>The estates and mill visited maintained all records of visit and monitoring and available at the office for review. Sighted the sampled records as follows:</p> <p><u>FPOM</u> Visit from Planning and Monitoring Units (PMU) reports were made available during the visit. Noted reports observed for visit for FY 2019 was carried out in February and May 2019. The report covered on Building and Facilities Management. No major issue was raised during the audit. Structured Oil Recovery Assessment (SORA) latest visit to Flemington POM was on 8 – 11/4/2019. The report covering on process control/safety, process losses, product quality, housekeeping/upkeep/environment and security. No major issue issued from the visit with rating at 4. All issue raised has been addressed by the mill.</p> <p><u>BDE</u> Latest Plantation Advisor visit was conducted on 28 – 30/1/2019. Refer report NTR/SOU4/BDE/01-2019. The report covers yield improvement, agro management practices and others. All issue raised during the visit has been addressed by the estate. Structured Crop Recovery Assessment (SCRA) latest visit on the estate was on 9/4/2019. The report was available at the estate for review. The report covers on crop recovery and crop quality. No issue raised during the visit with overall rating 4.86.</p> <p><u>SSE</u> Structured Crop Recovery Assessment (SCRA) latest visit on the estate was on 11/4/2019. The report was available at the estate for review. The report covers on crop recovery and crop quality. No issue raised during the visit with overall rating 4.84. Visit from Planning and Monitoring Units (PMU) reports were made available during the visit. Noted reports observed for visit for FY 2019 was carried</p> | <p>Complied</p> |
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| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>out in February and May 2019. The report covered on replanting, immature and mature manuring application and Building and Facilities Management. No major issue was raised during the audit.</p> <p><u>SBE</u> Latest Plantation Advisor visit was conducted on 15 – 17/1/2019. Refer report NTR/SOU4/SBE/01-2019. The report covers yield improvement, agro management practices and others. All issue raised during the visit has been addressed by the estate. Visit from Planning and Monitoring Units (PMU) reports were made available during the visit. Noted reports observed for visit for FY 2019 was carried out in February and May 2019. The report covered on replanting, immature and mature manuring application and Building and Facilities Management. No major issue was raised during the audit with rating at 4.7.</p> <p><u>FLE</u> Latest Plantation Advisor visit was conducted on 18 – 20/12/2018. Refer report STR/SOU4/SBE/18-19. The report covers yield improvement, agro management practices and others. All issue raised during the visit has been addressed by the estate. Visit from Planning and Monitoring Units (PMU) reports were made available during the visit. Noted reports observed for visit for FY 2019 was carried out in February and May 2019. The report covering on immature and mature upkeep, manuring, Building and Facilities Management, EVIT and Ex-Estate Cost. No major issue raised during the visit.</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| <p>4.1.4</p> <p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -</p> | <p>The mill received FFB from sister estate with RSPO certified and purchased from the outside FFB supplier. The records of FFB received was recorded in FFB delivery/consignment note, FFB weighbridge ticket and summarize in FFB Received Summary Report by Supplier.</p> <p>The FFB delivery/consignment was provided by the estate contains information such as:</p> <ul style="list-style-type: none"> i. Estate/Company Name ii. Date harvested ii. Estimate tonnage iii. Vehicle and trailer/bin no. <p>Sighted the sampled as follows:</p> <ul style="list-style-type: none"> a. DN/FFB ticket no: 8432 i. Estate/Company Name: Perniagaan Sinaran Mewah ii. Date harvested: 18/6/2019 ii. Estimate tonnage: 80 kg loose fruit iii. Vehicle and trailer/bin no.: AHX 6501 <p>The FFB weighbridge ticket contain information as follows:</p> <ul style="list-style-type: none"> i. The name, address and field/year planted ii. The weight of FFB delivered; iii. The delivery date and time; iv. Lorry No.; <p>Sighted the sampled as follows:</p> <ul style="list-style-type: none"> a. FFB ticket no: 234355 i. Estate/Company Name: Perniagaan Sinaran Mewah ii. The weight of FFB delivered: 6590 kg iii. The delivery date and time: 18/6/2019, 4:38:49 PM iv. Lorry No.: AKX 7388 | <p>Complied</p> |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| 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 - | Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield. | Complied |

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| <p>4.2.2</p> | <p>Records of fertiliser inputs shall be maintained. - Minor compliance -</p> | <p>Fertilizer application program is based on the recommendation by Agronomist and documented in Agronomic and Fertilizer Recommendation Report. Observed the recommendation and implementation record for FY 2019:</p> <p><u>BDE</u> The estate maintain the records of manuring application as per recommendation by the agronomist. Observed application records as per agronomist recommendation: Month program: April 2019 Field: 2015E, 2015F Ha program: 137.61 ha Type: Borate Rate/palm: 0.10 kg/palm Month applied: 25-27/4/2019 Ha applied: 137.61 ha</p> <p><u>SSE</u> The estate maintain the records of manuring application as per recommendation by the agronomist. Observed application records as per agronomist recommendation: Month program: April 2019 Field: 2014C Ha program: 55.76 ha Type: Rock Phosphate Rate/palm: 2.00 kg/palm Month applied: 13/5/2019 Ha applied: 55.76 ha</p> <p><u>SBE</u> Month program: July - August 2019 Field: 2015B and 2015C</p> | <p>Complied</p> |
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| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>Ha program: 104.79 ha Type: MOP Rate/palm: 1.25 kg/palm Month applied: 23 – 25/7/2019 Ha applied: 104.79 ha</p> <p><u>FLE</u> Month program: May 2019 Field: 2014N Ha program: 80.86 ha Type: RP Rate/palm: 2.50 kg/palm Month applied: 26/6 – 3/7/2019 Ha applied: 80.86 ha</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| <p>4.2.3</p> <p>There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -</p> | <p>Plant Nutrition and Protection Unit (PNU) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation. As per company SOP, the soil sampling analysis carried at 5 years interval. The leaf analysis and soil analysis report was made available for review. Noted the analysis report for estate visited as follows:</p> <p><u>BDE</u> Latest soil sampling analysis was carried out on 9/8/2018. Refer report no. S64/2018 dated 9/9/2018. Latest leaf sampling analysis was carried out on 25/6-31/7/2019. The result has yet to be received by the estate.</p> <p><u>SSE</u> Latest soil sampling analysis was carried out on 21/9/2018. Refer report no. S75/2018 dated 12/10/2018. Latest leaf sampling analysis was carried out in August 2018. The report was stated in the 2019 Agronomic and Fertilizer Recommendations Report.</p> <p><u>SSE</u> Latest leaf sampling analysis was carried out in November 2018. The report was stated in the 2019 Agronomic and Fertilizer Recommendations Report.</p> <p><u>FLE</u> Last soil sampling analysis was carried out on 23/10/2018. Refer report no. S88/2018 dated 8/11/2018. Last leaf sampling analysis was carried out on September 2017. Foliar nutrient status enclosed in 2019 Agronomic and Fertiliser Recommendations Reports dated 13/12/2018.</p> | <p>Complied</p> |

| Criterion / Indicator | | Assessment Findings | | | | | | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 4.2.4 | A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance - | Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. The strategy as follows: i. EFB applied at selected fields at the estates. ii. Fibre and POM were use as compost material. iii. Palm residues after planting were left in the biomass row to decompose. Sighted the records for EFB disposal as follows: <table border="1" data-bbox="981 624 1854 1230"> <thead> <tr> <th>Month</th> <th>Compost</th> <th>BDE</th> <th>FLE</th> <th>SBE</th> <th>SSE</th> </tr> </thead> <tbody> <tr><td>Jun 18</td><td></td><td>1108.26</td><td>233.64</td><td>396.48</td><td>79.86</td></tr> <tr><td>Jul 18</td><td></td><td>2138.52</td><td>501.78</td><td>790.08</td><td>149.25</td></tr> <tr><td>Aug 18</td><td></td><td>1827.47</td><td>369.40</td><td>880.30</td><td>105.20</td></tr> <tr><td>Sep 18</td><td></td><td>1132.62</td><td>647.25</td><td>1007.15</td><td>33.34</td></tr> <tr><td>Oct 18</td><td></td><td>2545.41</td><td>396.07</td><td>1664.38</td><td>209.23</td></tr> <tr><td>Nov 18</td><td></td><td>1192.95</td><td>301.83</td><td>897.18</td><td>5.53</td></tr> <tr><td>Dec 18</td><td></td><td>1021.81</td><td>304.68</td><td>1281.37</td><td>709.85</td></tr> <tr><td>Jan 19</td><td>64.00</td><td>1132.70</td><td>727.92</td><td>448.91</td><td>443.02</td></tr> <tr><td>Feb 19</td><td>135.00</td><td>1630.80</td><td>466.93</td><td>1105.37</td><td>504.18</td></tr> <tr><td>Mar 19</td><td>104.00</td><td>1728.45</td><td>1729.33</td><td>0</td><td>1075.09</td></tr> <tr><td>Apr 19</td><td>0.00</td><td>1653.57</td><td>768.80</td><td>313.23</td><td>661.79</td></tr> <tr><td>May 19</td><td>160.00</td><td>1745.92</td><td>261.46</td><td>499.87</td><td>1385.36</td></tr> <tr><td>Jun 19</td><td>0.00</td><td>1481.19</td><td>934.33</td><td>282.53</td><td>564.53</td></tr> </tbody> </table> | | | | | | Month | Compost | BDE | FLE | SBE | SSE | Jun 18 | | 1108.26 | 233.64 | 396.48 | 79.86 | Jul 18 | | 2138.52 | 501.78 | 790.08 | 149.25 | Aug 18 | | 1827.47 | 369.40 | 880.30 | 105.20 | Sep 18 | | 1132.62 | 647.25 | 1007.15 | 33.34 | Oct 18 | | 2545.41 | 396.07 | 1664.38 | 209.23 | Nov 18 | | 1192.95 | 301.83 | 897.18 | 5.53 | Dec 18 | | 1021.81 | 304.68 | 1281.37 | 709.85 | Jan 19 | 64.00 | 1132.70 | 727.92 | 448.91 | 443.02 | Feb 19 | 135.00 | 1630.80 | 466.93 | 1105.37 | 504.18 | Mar 19 | 104.00 | 1728.45 | 1729.33 | 0 | 1075.09 | Apr 19 | 0.00 | 1653.57 | 768.80 | 313.23 | 661.79 | May 19 | 160.00 | 1745.92 | 261.46 | 499.87 | 1385.36 | Jun 19 | 0.00 | 1481.19 | 934.33 | 282.53 | 564.53 | Complied |
| Month | Compost | BDE | FLE | SBE | SSE | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun 18 | | 1108.26 | 233.64 | 396.48 | 79.86 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul 18 | | 2138.52 | 501.78 | 790.08 | 149.25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug 18 | | 1827.47 | 369.40 | 880.30 | 105.20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep 18 | | 1132.62 | 647.25 | 1007.15 | 33.34 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct 18 | | 2545.41 | 396.07 | 1664.38 | 209.23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov 18 | | 1192.95 | 301.83 | 897.18 | 5.53 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec 18 | | 1021.81 | 304.68 | 1281.37 | 709.85 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan 19 | 64.00 | 1132.70 | 727.92 | 448.91 | 443.02 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb 19 | 135.00 | 1630.80 | 466.93 | 1105.37 | 504.18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar 19 | 104.00 | 1728.45 | 1729.33 | 0 | 1075.09 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr 19 | 0.00 | 1653.57 | 768.80 | 313.23 | 661.79 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May 19 | 160.00 | 1745.92 | 261.46 | 499.87 | 1385.36 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun 19 | 0.00 | 1481.19 | 934.33 | 282.53 | 564.53 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.3: Practices minimise and control erosion and degradation of soils. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| <p>4.3.1</p> | <p>Maps of any fragile soils shall be available. - Major compliance -</p> | <p>Soil series map available for all estates visited.</p> <p><u>BDE</u> No fragile soil categorized in the estate. Most soil series in the estate are as follows: Bagan Datoh Div.: Selangor (65.24%), Kangkong (28.43%), Acid Phase Selangor Series (6.33%) Melentang Div.: Selangor (65.24%), Kangkong (28.43%), Sedu (14.68%), Jawa (36.79%), Briah (13.20%), Tongkang (0.26%), Bernam (28.51%) and ex-swamp (0.22%).</p> <p><u>SSE</u> There were 258.40 ha of peat soils identified in the estate as per Soil Series Map issued by the AAT – Precision Agriculture Unit dated March 2019. No other soil categorised as problematic or fragile soil. Most soil series in the estate are as follows: Sungei Dua div.: Briah (74.65%), Selangor (25.35%) Sepong div.: Briah (51.90%), Selangor (48.10%) Yew Lian div.: Peat (68.41%), Selangor (35.19%) Old Samak div.: Briah (33.33%), Selangor (68.67%)</p> <p><u>SBE</u> No fragile soil categorized in the estate as per soil series map issued bt the R&D Precision Agriculture Unit dated 20/2/2018. Most soil series in the estate are as follows: Bernam (12.83%), Briah (26.87%), Selangor (12.83%) and Unclassified (47.47%).</p> <p><u>FLE</u> No fragile soil categorized in the estate. Most soil in the estate as follows: Teluk Buluh div.: Bernam (20.97%), Briah (11.83%), jawa (6.83%), Selangor (35.01%). Main div.: Bernam (100%)</p> | <p>Complied</p> |
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| <p>4.3.2</p> <p>A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -</p> | <p>Sime Darby has established Slope and River Protection Policy signed by the Managing Director dated 15/1/2015. In the policy clearly stated that:</p> <p>i. Slope of >25° must be excluded from any new planting development and replanting program.</p> <p>ii. Slope of <25°, the existing crop and vegetation shall be maintained accordingly.</p> <p>Planting terraces had been constructed where slope >10°. Fields are established with cover crops such as mucuna and soft grasses and ferns.</p> <p><u>BDE</u> Terrain classification: Flat (0-2o) – 99.72%, undulating (2- 6o) – 0.28 %</p> <p><u>SSE</u> Terrain classification: Flat (0-2o) – 91.31%, undulating (2- 6o) – 8.69 %</p> <p><u>SBE</u> Terrain classification: Flat (0-2o) – 99.82%, undulating (2- 6o) – 0.18%</p> <p><u>FLE</u> Terrain classification: Flat (0-2o) – 100.00%</p> | <p>Complied</p> |

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| 4.3.3 | <p>A road maintenance programme shall be in place. - Minor compliance -</p> | <p>Estates visited has established road maintenance program to ensure all road is in good condition at all time. The road maintenance program consist of road grading, patching potholes and lateriting.</p> <p><u>BDE</u> The estate has established road maintenance program FY 2019. Sighted the records of completed work done documented in the Road Maintenance program FY 2019. Sighted during site visit at P13A and P15E, the road maintenance program was completed and the road are in good conditions.</p> <p><u>SSE</u> The estate has established road maintenance program FY 2019. The road work focusing on road grading. Noted during site visit the road were in good conditions.</p> <p><u>SBE</u> The estate has established road maintenance program FY 2019. The road maintenance work focusing on road grading, patching pothole and road compacting. Noted during site visit, the road maintenance work is still in progress. Sighted the road were in good condition.</p> | Complied |

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| <p>4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -</p> | <p>Based on established ARM, section 10: Water Management In Coastal and Peat Plantings, Water management on peat area is based on the established SOP, level 3, section B15 entitled water management. Water level marker is located at 800 -1000m interval (close to sluice gate/drain block). Visited water level marker for upstream water sampling point at P11 found at green level which recorded at desired level. Water level indicator as per below reading: Green – 45- 60 cm from soil surface (optimal level for acid sulphate/peat) Yellow – 60 – 90 cm from soil surface (optimal level for non-acid sulphate soil) Red – above 90 cm from soil surface</p> <p><u>SSE</u> The estate have 258.40 ha of peat area in Yiew Lian Division. The estate has established the Water Management Plan for Peat Area. The management plan was reviewed on annually basis. Latest review was done on 12/1/2019. Sighted the implementation and monitoring records for the plans as follows: i. Maintain water level at 40 – 60 cm: Sighted the water measurement point at P01B. The measuring pole with 3 colours as per SOP established. Current water level sighted during the visit at Green Level - 45- 60 cm from soil surface. Sighted the weekly water level monitoring records done on weekly basis.</p> | <p>Complied</p> |
| <p>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 -</p> | <p><u>SSE</u> Replanting program for peat area were scheduled in 2022. The drainability assessment will be conducted prior to replanting before the land preparation process.</p> | <p>Complied</p> |

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| 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 - | Management strategy for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils) is based on the established ARM, section 10: Water Management In Coastal and Peat Plantings. 2 management strategies; optimal water level monitoring and flushing of acid rain water. Verified management plan for 2019 at Sungai Samak Estate as per criteria 4.3.4. | 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 - | The water management plan for both mill and estates have been established for year 2019. Generally, the plans were focusing on: <ul style="list-style-type: none"> • Management of wastewaters e.g. of action plans: reusing of water at pre-mixing chemical area, oil trap at workshop, septic tank • Reduction of fresh water usage e.g. of action plans: rainwater collection, awareness among employees on water saving, maintenance of piping system • Contingency plan during water shortage e.g. of action plans: to purchase water from Perak Water Board, to train staff/workers in saving water (seen training record at mill dated 8/10/2018) The SOP for taking water samples from stream/rivers was based on Sime Darby Plantation's Sustainable Plantation Management System Ver. 2 1/6/2016 Appendix 7, especially for monitoring as well as other requirement by respective operating units. | Complied |

| <p>4.4.2</p> | <p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -</p> | <p>Among the water management plan established by the estates in order to protect the water courses were:</p> <ul style="list-style-type: none"> • reusing water residue from agrochemical pre-mixing and PPE washing activities • installation of oil trap at workshop drainage <p>Management of riparian zone is guided by River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table border="1" data-bbox="981 651 1615 855"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/ rivers, version 1, year 2008, issue no. 1, dated 1/11/2008. This can be evident through verification of water analysis test report for upstream, mid-stream and downstream rivers crossing the estates, e.g. report no. IE452/2019 dated 29/4/2019, IE68/2019 dated 24/1/2019, IE1219/2018 dated 25/10/2018 and IE892/2019 dated 2/8/2018 at Flemington Estate. Among the parameters analysed were pH, BOD, COD, SS, AN, DS and P. Whenever off specs result is obtained, from WQ-01/CPAR(1), (2) & (3) are used to record the identified root cause and corrective action taken.</p> <p>Apart from that the content of pesticides in the river such as Aldrin, Dieldrin, t-DDT, Heptachlor, Heptachlor Epoxide, Chlordane, Lindane and Endosulfan. This can be evident through verification of water analysis test report for upstream, mid-stream and downstream rivers crossing the</p> | River width | Buffer zone | > 40 meters | 50 meters | 20 to 40 meters | 40 meters | 10 to 20 meters | 20 meters | 5 to 10 meters | 10 meters | < 5 meters | 5 meters | <p>Complied</p> |
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| River width | Buffer zone | | | | | | | | | | | | | | |
| > 40 meters | 50 meters | | | | | | | | | | | | | | |
| 20 to 40 meters | 40 meters | | | | | | | | | | | | | | |
| 10 to 20 meters | 20 meters | | | | | | | | | | | | | | |
| 5 to 10 meters | 10 meters | | | | | | | | | | | | | | |
| < 5 meters | 5 meters | | | | | | | | | | | | | | |

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| | | estates, e.g. report no. PL50/2019 dated 18/1/2019 and PL814/2018 dated 24/10/2018 (Flemington Estate). Based on those reports, the results showed no presence of pesticides in the samples. | |
| 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. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Last 12 months results were verified where highest BOD = 100 ppm while lowest = 36 ppm were recorded. The results complied with the regulated requirement i.e. 100 ppm. About 50% of the effluent was used for composting plant extracted from Acidification Pond #2 and #3. | Complied |
| 4.4.4 | Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance - | Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is obtained from Perak River. To-date, the process of permit issuance from Teluk Intan District & Land Office, which has been initiated in year 2002. An average of 1.10 m ³ /mt FFB water was used for FFB processing recorded from July 2018 to June 2019. | Complied |
| Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques. | | | |

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| <p>4.5.1</p> | <p>Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -</p> | <p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estates are continue to plant beneficial plants such as Turnera subulata.</p> <p><u>BDE</u> The estate has established IPM program FY 2019. The plan was reviewed on annually basis. Latest review was done on 1/9/2019. The IPM consist of Planting Beneficial Plant, Rat Baiting Applications and Barn Owl Census. Sighted the implementation of the plan as follows: i. Barn owl box: Occupancy rate recorded at average of at 61% at mature area and 62% at immature area together with BOB maintenance and replacement/new box. ii. Record of planting of beneficial plant Cassia Cobanensis, Tunera Subulata, Antigonan Leptopus was available for review as per IPM plan with ratio of 6:2:2 (target: 2dm/ha).</p> <p><u>SSE</u> The estate has established IPM program, the program was review on annually basis. The plan focusing on increase beneficial plant establishment, Ganoderma Issue, Barn Owl Box and Bagworm Problem. Sighted the implementation of the plan as follows: i. Latest Ganoderma Census was conducted on 31/8/2018. ii. Latest Rat Baiting campaign was conducted on September to November 2018. The baiting rounds was 3 – 5 rounds with acceptance level at 17 – 18%.</p> <p><u>SBE</u></p> | <p>Complied</p> |
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RSPO Public Summary Report
Revision 8 (Mar /2019)

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>The estate has established IPM program, the program was review on annually basis. The plan focusing on increase beneficial plant establishment, Ganoderma Issue, Barn Owl Box and Bagworm Problem. Sighted the implementation of the plan as follows:</p> <ul style="list-style-type: none"> i. Latest barn owl box census was conducted in February 2019. Occupancy rate recorded at average of at 81.41% at mature area and immature area. ii. Latest Rat Baiting campaign was conducted on March to May 2019. The baiting rounds was 3 – 4 rounds with acceptance level at 8 – 18%. <p><u>FLE</u></p> <p>The estate has established Action Plan for IPM FY 2019. The management plan cover on training, rat baiting application, barn owl census, beneficial plant planting, bagworm and etc. Sighted the implementation as follows:</p> <ul style="list-style-type: none"> i. Latest Rat Baiting campaign was conducted on April to May 2019. The baiting rounds was 3 – 5 rounds with acceptance level at 15 – 18%. ii. Latest barn owl box census was conducted in February 2019. Occupancy rate recorded at average of at 66%. iii. Sighted the maintenance of beneficial plant was documented in Best Practices in Flemington Estate. | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| <p>4.5.2 Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -</p> | <p>IPM training has been provided by the plantation executives to the field supervisor and mandore. Interview with the management team, mandore and P&D sprayer confirm their understanding of the benefit of planting beneficial plant to fight pest, barn owl box maintenance and pest and disease spray. Sighted the sampled training records as follows:</p> <p><u>BDE</u></p> <ul style="list-style-type: none"> i. Barn Owl Box training dated 12/7/2019 ii. RB spraying method training dated 26/4/2019 <p><u>SSE</u></p> <ul style="list-style-type: none"> i. PPE and Safety for Pest and Disease sprayers training dated 14/5/2019 and 20/3/2019 ii. SOP and safety working procedure for Pest and Disease sprayers dated 23/1/2019 <p><u>SBE</u></p> <ul style="list-style-type: none"> i. Beneficial plant planting training dated 2/7/2019 ii. Bagworm and Nettle Caterpillar Census training dated 2/7/2019 iii. Barn owl census training dated 2/7/2019 <p><u>FLE</u></p> <ul style="list-style-type: none"> i. Rat baiting application training dated 18/2/2019 | <p>Complied</p> |
| <p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p> | | |

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| 4.6.1 | Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance - | The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease. | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.6.2 | Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance - | Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Sighted the sampled records of pesticides usage per ha at estate visited as follows: <table border="1" data-bbox="981 767 1868 1007"> <thead> <tr> <th>Month</th> <th>BDE</th> <th>SSE</th> <th>SBE</th> <th>FLE</th> </tr> </thead> <tbody> <tr> <td>Jan 19</td> <td>0.44</td> <td>0.589</td> <td>0.34</td> <td>0.287</td> </tr> <tr> <td>Feb 19</td> <td>0.17</td> <td>0.748</td> <td>0.21</td> <td>0.617</td> </tr> <tr> <td>Mar 19</td> <td>0.22</td> <td>0.348</td> <td>0.25</td> <td>0.647</td> </tr> <tr> <td>Apr 19</td> <td>0.20</td> <td>0.260</td> <td>0.23</td> <td>0.511</td> </tr> <tr> <td>May 19</td> <td>0.31</td> <td>0.260</td> <td>0.19</td> <td>0.636</td> </tr> <tr> <td>Jun 19</td> <td>0.28</td> <td>0.609</td> <td>0.28</td> <td>0.813</td> </tr> </tbody> </table> | Month | BDE | SSE | SBE | FLE | Jan 19 | 0.44 | 0.589 | 0.34 | 0.287 | Feb 19 | 0.17 | 0.748 | 0.21 | 0.617 | Mar 19 | 0.22 | 0.348 | 0.25 | 0.647 | Apr 19 | 0.20 | 0.260 | 0.23 | 0.511 | May 19 | 0.31 | 0.260 | 0.19 | 0.636 | Jun 19 | 0.28 | 0.609 | 0.28 | 0.813 | Complied |
| Month | BDE | SSE | SBE | FLE | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan 19 | 0.44 | 0.589 | 0.34 | 0.287 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb 19 | 0.17 | 0.748 | 0.21 | 0.617 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar 19 | 0.22 | 0.348 | 0.25 | 0.647 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr 19 | 0.20 | 0.260 | 0.23 | 0.511 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May 19 | 0.31 | 0.260 | 0.19 | 0.636 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun 19 | 0.28 | 0.609 | 0.28 | 0.813 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.6.3 | Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance - | The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5. | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| <p>4.6.4</p> | <p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, 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.</p> <p>- Minor compliance -</p> | <p>Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III & IV chemical used at visited estates. Alternative for class IA chemical, Methamidophos was used named Acephate under class III for bagworm infestation.</p> <p><u>SSE</u> Permit to buy Acephate to control bagworm were available for review. Refer to permit, PRK/2019/ACP/025(GL) dated 16/6/2019 for purchasing 194 kg of Acephate.</p> | <p>Complied</p> |

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| <p>4.6.5</p> | <p>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>Pesticides operators for all estates visited has been provided with proper Personal Protective Equipment. Observed during site visit, the PPE provided to the operators such as google, half face respirator, nitril hand glove, rubber boot and apron. Additional, the operators has been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly medical check-up done by the Medical Assistant. Observed the implementation during site visit and workers interview in following estate:</p> <p><u>BDE</u> Pesticides operators has been supplied with proper PPE. The operators has been given training regarding the usage safety and health issue and proper way for chemical application. It was observed during site visit and interview with the sprayer at P13A. Sighted the training records as follows; i. PPE awareness for sprayers dated 13/6/2019 ii. Maintenance of spraying equipment and calibration dated 25/6/2019 iii. Chemical and spraying SOP training dated 18/4/2019 iv. USECHH 2000 training dated 9/4/2019 v. Trunk injection training dated 19/3/2019</p> <p><u>SSE</u> i. Maintenance and Usage of Inter Pump training dated 3/7/2019 ii. PPE and Safety for sprayers training dated 14/5/2019 and 20/3/2019 iii. SOP and safety working procedure for sprayers dated 23/1/2019 iv. SDS, SOP for manuring training dated 14/2/2019 v. Spraying techniques, safety aspects and Maintenance of Inter Pump training dated 9/1/2019</p> <p><u>SBE</u> Pesticides operators has been supplied with proper PPE. The operators has been given training regarding the usage safety and health issue and proper</p> | <p>Complied</p> |
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| | <p>way for chemical application. It was observed during site visit and interview with the sprayer at P18E. Sighted the training records as follows; i. Circle spraying and first aid kit training dated 3/7/2019 ii. Scheduled waste refresher training dated 10/6/2019 iii. Pest and disease spraying training dated 3/7/2018</p> <p><u>FLE</u> i. PPE and SOP for Sprayer training by Asst. Manager dated 16/7/2018 ii. Spraying technique and PPE usage training by Asst. Manager 21/8/2018 iii. Inter Pump and PPE training by My Crop Sdn. Bhd dated 4/12/2018 iv. Spraying techniques, Safety Aspects and Maintenance of Inter Sprayer by My Crop Sdn. Bhd. dated 23/7/2019</p> | |
| 4.6.6 | <p>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> | Complied |
| 4.6.7 | <p>Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -</p> | Complied |
| 4.6.8 | <p>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 -</p> | Complied |

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| 4.6.9 | Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance - | No associated smallholders at SOU4. Employees demonstrate knowledge and skills on pesticide handling. MSDS/SDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers. | Complied |
| 4.6.10 | Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance - | Disposal methods of all the identified wastes have been addressed in the pollution prevention plan. 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 good a understanding on wastes disposal. | Complied |

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| <p>4.6.11</p> | <p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p> | <p><u>BDE</u> Medical surveillance for workers involve in pesticides and chemical handling was conducted on annually basis. Latest medical surveillance was conducted on 26/4/2019 and 27/6/2019. Sighted the medical surveillance report, noted that all workers went for the surveillance were fit to work as pesticides and chemical handling job.</p> <p><u>SSE</u> Latest medical surveillance was conducted by OSH Doctor (ref. certificate no. HQ/08/DOC/00/660) on 27/9/2018 and 4/10/2018. Total 58 workers were sent for surveillance and all are found fit to work as pesticides operators and chemical handlers. Refer Medical Surveillance Summary reports dated 24/10/2019.</p> <p><u>SBE</u> Latest medical surveillance was conducted by OSH Doctor (ref. certificate no. HQ/08/DOC/00/131) on 15/3/2019, 22/3/2019, 2/4/2019 4/4/2019, 12/4/2019, 15/4/2019, 19/4/2019, 8/5/2019, 17/5/2019, 18/5/2019 and 24/5/2019. Total 38 workers were sent for surveillance and all are found fit to work as pesticides operators and chemical handlers. Refer Certificates of fitness for all workers attend the medical surveillance.</p> <p><u>FLE</u> Latest medical surveillance was conducted by OSH Doctor (ref. certificate no. HQ/08/DOC/00/131). The surveillance conducted on 3/6/2019. 7 workers was sent for surveillance and found fit to work as pesticides handler.</p> | <p>Complied</p> |

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| <p>4.6.12 No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -</p> | <p>Sime Darby has established Gender Policy on Motherhood Responsibilities and Reproductive Rights on prohibition of all confirmed pregnant and breast-feeding woman to work with pesticides.</p> <p><u>BDE</u> The estate prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as per memo dated 2/7/2013 signed by the estate manager. The memo has been displayed on the notice board at few strategic place in the estate.</p> <p><u>SSE</u> The estate prohibited all confirmed pregnant and breast-feeding woman as per Gender Policy on Motherhood Responsibilities and Reproductive Rights established.</p> <p><u>SBE</u> The estate prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as per memo dated 27/6/2016 signed by the estate manager. The memo has been displayed on the notice board at few strategic place in the estate.</p> | <p>Complied</p> |
| <p>Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p> | | |

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| <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>Sime Darby has established the Group Policy on Health and Safety signed by the Managing Director on Jan 2015. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the mill. The GSQM team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p> <p><u>FPOM</u> The mill has established safety and health plan documented ESH and Other Requirement Plan FY 2019. The plan covers on Safety and Health Committee, NADOPOD and OSH reporting, Risk Management, Machinery Safety, Chemical Management, Noise Management, Confined Space Management, ERP and training. i. Fire drill training was conducted on 10/4/2019 with assembly time at 4.05 minutes.</p> <p><u>BDE</u> The estate has established and implemented OSH plan FY 2019. The management plans focusing on to achieve zero fatal accident, Safe work environment for all employees, Linesite beatification, harvesting safety, upkeep safety and ESH Recording. Sighted the implementation of the management plan as follows: i. Workplace inspection was conducted on quarterly basis prior to OSH committee meeting. The inspection results was discussed in the meeting.</p> <p><u>SSE</u> The estate has established Safety and Health Plan FY 2019. 12 issue identified and programmed to be conducted and monitored throughout the year such as OSH risk management, OSH Structure, Incident reporting, ERP, Chemical Safety Management, Contractors safety management, Vehicle safety management, scheduled waste, communication, inspection,</p> | <p>Complied</p> |
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| | <p>Health and hygiene monitoring and awareness and competency training. Sighted the implementation of the plan as follows:</p> <ul style="list-style-type: none"> i. Inspection of first aid kit was conducted by the Medical Assistance on monthly basis. The inspection records was available for review at the office. <p><u>SBE</u> The estate has established ESH Action Plan FY 2019. The plan consist of Safety and Health program and training program. The objective of the plan for Continuous Improvement on ESH management, to provide education/training on OSH to all employee and to ensure compliance to ESH legislation and target zero LTI. The plan focus to create safe working environment, clean and green linesite, improve workshop and store area, harvesting operation, chemical handling and reporting system. Sighted the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> i. Monthly medical check-up for pesticides and P&D sprayers was conducted as per program. The check-up was done by the MA with attendance by the VMO. Sighted the records for month of March, April and May 2019. ii. Inspection of first aid box was conducted on weekly basis. Sighted the inspection records in First Aid Box logbook. <p><u>FLE</u> The estate has established the Environment, Safety and Health Program FY 2019. The program cover on all safety and health related program. Sighted the implementation of the plan as follows:</p> <ul style="list-style-type: none"> i. Medical surveillane was conducted on annually basis. Latest the medical surveillane was conducted on 3/6/2019. | |

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| <p>4.7.2</p> | <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p> | <p>The mill and estates visited has conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment cover all main operations and support operations such as security, office, store, weighbridge, fruit handling, threshing and etc. The assessment also covers working type, job step, hazard, effect, existing control, type, probability, etc. HIRARC Review was conducted by HIRADC Committee on annually basis and when necessary as stated in the Occupational Safety and Health Manual, Chapter 6 – HIRARC, ver. 1 dated 20/8/2008.</p> <p><u>FPOM</u> Latest review was conducted on 15/6/2019 due to accident happen on 18/4/2019 at oil room station during conducting repair at the CPO production pump.</p> <p><u>BDE</u> HIRARC was reviewed on annually basis or when accident occur. Latest review was conducted on 24/12/2018. Amendment was done to section General Work, Supervision: Travelling in the Field. The HIRARC review was also discuss during Safety Committee Meeting.</p> <p><u>SSE</u> Latest review was conducted 13/3/2019 (harvesting), 25/1/2019 (workshop) due to accident occur at the workstation. The HIRARC review was also discussed during the OSH Committee Meeting conducted on quarterly basis.</p> <p><u>SBE</u> HIRARC review was conducted on annually basis or when accident happen in the estate. As for FY 2019, the HIRARC has been reviewed on 3/6/2019 (workshop under section vehicle repairs and maintenance) and 17/4/2019</p> | <p>Complied</p> |
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| | <p>(Harvesting under section stacking fronds) due to accident occur at both work station.</p> <p><u>FLE</u> HIRARC review was conducted on annually basis or when accident happen in the estate. As for FY 2019, the HIRARC has been reviewed on 4/4/2019 for harvesting operation under fruit collection section due to accident occur at the work station on 30/3/2019. The review was conducted by the HIRARC committee. The HIRARC review was also been discussed in the OSH committee meeting conducted on quarterly basis.</p> | |

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| <p>4.7.3</p> | <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -</p> | <p>All workers involved in operation has been provided with adequate training in safe working practice as per program in the training plan. Training was conducted by the person with knowledge on the training subject such as Manager, Asst. Manager, GSQM/HQ executive and chemical/equipment supplier. Sighted the training record as follows:</p> <p><u>FPOM</u></p> <ul style="list-style-type: none"> i. SOP refresher training dated 31/1/2019 and 29/1/2019 ii. Ramp SOP training dated 31/1/2019 iii. Water treatment plan SOP training dated 21/1/2019 iv. Store SOP training dated 30/1/2019 <p>The mil provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008.</p> <p><u>BDE</u></p> <ul style="list-style-type: none"> i. Air blower training dated 25/5/2019 ii. Personal hygiene and health training dated 14/5/2019 iii. Tractor driving and heavy machinery handling training dated 9/4/2019 iv. Preventive maintenance vehicle training dated 15/1/2019 v. Triple rinsing training dated 13/12/2018 <p>The estate provided PPE to all workers as per HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008. Noted during site visit and interview with sprayers, the sprayers were provided with safety goggle, respirator, apron, nitrile gloves and wellington boots.</p> <p><u>SSE</u></p> <ul style="list-style-type: none"> i. SOP and safety training for pruning and harvesting dated 18/7/2019 ii. Scheduled waste handling training dated 18/5/2019 iii. Maintenance and Usage of Inter Pump training dated 3/7/2019 | <p>Complied</p> |
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| | | <p>iv. PPE and Safety for sprayers training dated 14/5/2019 and 20/3/2019 v. SOP and safety working procedure for sprayers dated 23/1/2019 vi. SDS, SOP for manuring training dated 14/2/2019</p> <p>The estate provided PPE to all workers as per HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008. Noted during site visit and interview with harvesters, they were provided with safety helmets, sickle cover and wellington boots.</p> <p><u>SBE</u></p> <p>i. Drivers Competency training dated 22/6/2019 ii. SOP for manuring training dated 21/6/2019 iii. Safety harness for segregation workers training dated 9/4/2019 iv. SBE Palm Pro Non-Conductive Pole training dated 25/2/2019</p> <p>The estate provided PPE to all workers as per HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008. Noted during site visit and interview with sprayers, the sprayers were provided with safety goggle, respirator, apron, nitrile gloves and wellington boots.</p> <p><u>FLE</u></p> <p>i. Scheduled waste management training dated 22/4/2019 ii. Manuring application training dated 18/6/2019 iii. Chemical handling training dated 4/1/2019 iv. PPE and SOP for Sprayer training by Asst. Manager dated 16/7/2018 v. Spraying technique and PPE usage training by Asst. Manager 21/8/2018 vi. Inter Pump and PPE training by My Crop Sdn. Bhd dated 4/12/2018 vii. Spraying techniques, Safety Aspects and Maintenance of Inter Sprayer by My Crop Sdn. Bhd. dated 23/7/2019</p> <p>The estate provided PPE to all workers as per HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008. Noted during site visit and interview with</p> | |
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| | <p>sprayers, the sprayers were provided with safety goggle, respirator, apron, nitrile gloves and wellington boots.</p> | |

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| <p>4.7.4</p> | <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p> | <p><u>FPOM</u> The mill has established the Safety and Health Committee lead by the Mill Manager and help by the committee consist of management and employee representative as per appointment letter signed by the Mill Manager. The committee hold the meeting on quarterly basis as the ESH Plan established. Sighted the minutes meeting conducted on 12/6/2019, 12/3/2019 and 12/12/2018. The meeting covers on Workplace inspection, Accident report, Fire Fighting equipment inspection, First Aid inspection, Lighting inspection and etc.</p> <p><u>BDE</u> The estate has established Environmental, Safe and Health Committee consist of the Management and employee representative. The committee was led by the Estate Manager as committee chairman. Meeting was conducted on quarterly basis. Sighted the latest ESH Committee meeting minutes conducted on 25/6/2019, 27/3/2019 and 26/12/2018.</p> <p><u>SSE</u> The estate has established Environmental, Safe and Health Committee consist of the Management and employee representative. The committee was led by the Estate Manager as committee chairman. Meeting was conducted on quarterly basis. Sighted the latest ESH Committee meeting minutes conducted on 29/4/2019, 29/1/2019 and 23/10/2018. In the meeting discussed on Workplace Inspection report, Accident report, Unsafe Act report, Legal and Other Requirement, HIRARC Review, PSQM and GCAD report, training, ESH program status, Medical Surveillance report, Health report and Linesite Inspection report.</p> <p><u>SBE</u> The estate has established Environmental, Safe and Health Committee consist of the Management and employee representative. The committee was led by the Estate Manager as committee chairman. Meeting was</p> | <p>Complied</p> |
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**RSPO Public Summary Report
Revision 8 (Mar /2019)**

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>conducted on quarterly basis. Latest meeting was conducted on 27/6/2019, 22/3/2019 and 3/12/2019. In the meeting discussed on Accident report, workplace inspection, training, health report, and other matters related to safety and health.</p> <p><u>FLE</u> The estate has established Safety and Health committee lead by the Manager as chairman and helped by the committee consist of management and employee representative. The committee meeting was conducted on quarterly basis. Latest committee was conducted on 12/7/2019, 26/4/2019 and 22/1/2019. The committee discussed on workplace inspection, accident and incident review, Unsafe act/condition, Compliance of safety by Contractors, Legal compliance, OSH training and any other matters related with safety and health.</p> | |

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| <p>4.7.5</p> | <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p> | <p>Emergency Response Procedure has been established and documented in Mill Quality Management Manual v.1 2008/MQMS/QMM/08 in sub-section 5.5, appendix 5.5.3.3. The emergency procedures has been communicated to the workers through training and briefing. Additionally, the procedure has been displayed on the notice board in local language, Bahasa Malaysia.</p> <p><u>FPOM</u> The mill has established the Emergency Response Team lead by the Mill Manager as the emergency commander and assist by the ERP team. The team consist of Fire Fighting and Spillage team, Search and Rescue team, First Aider team and Accident and Investigation team. Latest fire drill training was conducted on 10/4/2019 with assembly time at 4.05 minutes.</p> <p>Estates visited has established Emergency Response Team. ERP training was continuously conducted to ensure the awareness to all employee. First Aid box was provided at each workstation and monitored by the Hospital/Medical Assistant. For field operation, the mandore for each work group were provided with First Aid Box. Noted during interview with the mandore shows the understanding on the basic first aid treatment is satisfactory. Sighted the training records for ERP and First Aid as follows:</p> <p><u>BDE</u> i. Fire drill training dated 9/5/2019 with 10 minutes evacuation time. 16/4/2019 ii. ERP on Chemical Spillage, Poisoning and firefighting training dated 12/9/2018 iii. First Aid training dated 28/6/2019</p> <p><u>SSE</u> i. First Aid training dated 7/3/2019 ii. ERP and Fire drill training dated 29/4/2019.</p> | <p>Complied</p> |
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**RSPO Public Summary Report
Revision 8 (Mar /2019)**

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p><u>SBE</u></p> <ul style="list-style-type: none"> i. Fire drill training with Fire Department Sabak Bernam dated 5/7/2019 ii. First aid kit training dated 10/6/2019 <p><u>FLE</u></p> <ul style="list-style-type: none"> i. Fire drill training dated 13/7/2018. Next fire drill training was scheduled in August as discussed in OSH committee meeting dated 12/7/2018. ii. First aid training dated 8/7/2019 | |

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| <p>4.7.6</p> | <p>All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p> | <p>Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances.</p> <p><u>FPOM</u> Malaysian workers are covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Refer to form 8A, "Jadual Caruman" for April, May and June 2019. Foreign workers are also covered by SOCSO as per registration application letter dated 17/6/2019. The application have been received by SOCSO on 17/6/2019. Refer letter no. 208/D44/CAN06201900069439.</p> <p><u>BDE</u> Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for April, May and June 2019. Foreign workers has been registered under SOCSO. Sighted registration application letter dated 17/5/2019. The application have been received by SOCSO on 17/5/2019. Refer letter no. 208/D44/CAN05201900041859.</p> <p><u>SSE</u> Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for April, May and June 2019. Foreign workers has been registered under SOCSO. Sighted registration application letter dated 17/5/2019. The application have been received by SOCSO on 17/5/2019. Refer letter no. 208/D44/CAN05201900098084.</p> <p><u>SBE</u> Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for June 2019.</p> | <p>Complied</p> |
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| | | <p>Foreign workers has been registered under SOCSO. Sighted registration application letter dated 17/5/2019. The application have been received by SOCSO on 27/2/2019. Refer letter no. 208/B33/CAN022019000126614.</p> <p><u>FLE</u> Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for May and June 2019.</p> <p>Foreign workers has been registered under SOCSO. Sighted registration application letter dated 17/5/2019. The application have been received by SOCSO on 11/5/2019. Refer letter no. 208/D44/CAN02201900059679.</p> | | | | | | | | | | | | | | | | | | | |
| 4.7.7 | Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance - | <p>Accident records are found to be updated. All records on Lost Time Accident (LTA) metrics are maintained. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2018 as reported to DOSH as follows:</p> <table border="1"> <thead> <tr> <th>Unit</th> <th>FPOM</th> <th>BDE</th> <th>SSE</th> <th>SBE</th> <th>FLE</th> </tr> </thead> <tbody> <tr> <td>Cases</td> <td>3</td> <td>5</td> <td>5</td> <td>6</td> <td>3</td> </tr> <tr> <td>LTA</td> <td>15</td> <td>78</td> <td>8</td> <td>140</td> <td>41</td> </tr> </tbody> </table> | Unit | FPOM | BDE | SSE | SBE | FLE | Cases | 3 | 5 | 5 | 6 | 3 | LTA | 15 | 78 | 8 | 140 | 41 | Complied |
| Unit | FPOM | BDE | SSE | SBE | FLE | | | | | | | | | | | | | | | | |
| Cases | 3 | 5 | 5 | 6 | 3 | | | | | | | | | | | | | | | | |
| LTA | 15 | 78 | 8 | 140 | 41 | | | | | | | | | | | | | | | | |
| <p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p> | | | | | | | | | | | | | | | | | | | | | |
| 4.8.1 | A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance - | The mill and estates visited has established the training program base on training need analysis conducted. The training need analysis conducted on annually basis to determine the training required by the management team, employee and contractors. The training identified include general and operation training have been programmed throughout the year. | Complied | | | | | | | | | | | | | | | | | | |

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| <p>4.8.2</p> | <p>Records of training for each employee shall be maintained. - Minor compliance -</p> | <p><u>FPOM</u> The mill maintain the training records for all employee. Sighted the training records as follows: i. Scheduled waste management meeting and training dated 22/4/2019 ii. ERP - Oil spillage training dated 20/4/2019 iii. First aid training dated 20/4/2019 iv. Chemical handling and labelling training dated 8/7/2019 v. Policy, COBC, RSPO, MSPO Whistle blowing training dated 24/6/2019 vi. MSPO Refresher training dated 11/7/2019 vii. Screening Spin Test Personel training dated 22/5/2019 viii. Noise exposure training dated 15/7/2019</p> <p>The estates visited maintain records for all training conducted for the employee. Sighted the sampled training records as follows:</p> <p><u>BDE</u> i. ERP on Chemical Spillage, Poisoning and firefighting training dated 12/9/2018 ii. Air blower training dated 25/5/2019 iii. Personal hygiene and health training dated 14/5/2019 iv. Tractor driving and heavy machinery handling training dated 9/4/2019 v. Preventive maintenance vehicle training dated 15/1/2019</p> <p><u>SSE</u> i. SOP and safety training for pruning and harvesting dated 18/7/2019 ii. Scheduled waste handling training dated 18/5/2019 iii. Policy training dated 26/2/2019 iv. Environmental awareness, HCV and biodiversity training dated 28/2/2019 v. Whistleblowing and COBC training dated 20/2/2019 vi. Harvesting refresher training dated 2 - 3/1/2019</p> | <p>Complied</p> |
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| | | <p><u>SBE</u></p> <p>i. COBC, HCV, Policy, ERP, Waste Management and Endangered Species training ii. dated 29/6/2019</p> <p>ii. Drivers Competency training dated 22/6/2019</p> <p>iii. SOP for manuring training dated 21/6/2019</p> <p>iv. COBC, HCV, Policy, ERP, Waste Management and Endangered Species for contractors training dated 14/6/2019</p> <p>v. Safety harness for segregation workers training dated 9/4/2019</p> <p>vi. Palm Pro Non-Conductive Pole training dated 25/2/2019</p> <p><u>FLE</u></p> <p>i. First aid training dated 8/7/2019</p> <p>ii. Briefing on employment agreement and safety briefing dated 10/5/2019</p> <p>iii. Palm Cut Chisel and Sickle training dated 1/11/2018</p> | |
| <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> | | | |
| 5.1.1 | <p>An environmental impact assessment (EIA) shall be documented.</p> <p>- Major compliance -</p> | <p>The assessment of environmental impact is documented in the following documents:</p> <ul style="list-style-type: none"> • Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register • Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI • Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE | Complied |

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| <p>5.1.2</p> | <p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -</p> <p>Environment Aspect and Impact Identification for various activities- construction work, compound, dispensary, field, harvesting and collection, main entrance, pest and disease control, petrol and diesel, power station, replanting, road, schedule waste store, workshop. After the EAI is completed, the Environmental Impact Evaluation is conducted to evaluate the impact severity using a format (Environmental Impact Evaluation Form). There are 3 classifications of impact established in order to justify the action plan (mitigations) required i.e.:</p> <table border="1" data-bbox="981 687 1865 855"> <thead> <tr> <th colspan="2">Guidance of Action required</th> </tr> </thead> <tbody> <tr> <td>100 ~ 199</td> <td>No action required</td> </tr> <tr> <td>200 ~ 249</td> <td>To initiate corrective and preventive actions</td> </tr> <tr> <td>250 and above</td> <td>To develop environmental objective and programme</td> </tr> </tbody> </table> <p>An Environmental Pollution Prevention Plan for 2019 was made available by both mill and estates. The plans have the information about environmental issue, improvement plan, location, PIC and time frame. This environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts.</p> | Guidance of Action required | | 100 ~ 199 | No action required | 200 ~ 249 | To initiate corrective and preventive actions | 250 and above | To develop environmental objective and programme | <p>Complied</p> |
| Guidance of Action required | | | | | | | | | | |
| 100 ~ 199 | No action required | | | | | | | | | |
| 200 ~ 249 | To initiate corrective and preventive actions | | | | | | | | | |
| 250 and above | To develop environmental objective and programme | | | | | | | | | |

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| 5.1.3 | This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance - | Updating of the progress of plan is carried out by the assistant managers and the results of the monitoring effectiveness are reviewed in the management units operating meetings. Mitigation measures were included in the environmental management plan and reviewed from time to time. | Complied |
| 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. | | | |
| 5.2.1 | Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance - | Information of High Conservation Value (HCV) available in the HCV Re-Assessment Final Report; Version 2.0; September 2016 for Strategic Operating Unit (SOU) 4 Flemington. The HCV assessment was conducted by personnel from PSQM Department of Sime Darby Plantation Sdn. Bhd. reported a total of 28.54 ha HCV area within SOU 4. The HCV were of river reserves, stream buffer, water bodies and bun. The info available in this latest assessment report complements the info from Biodiversity Baseline Assessment Report dated back in February 2009. | Complied |
| 5.2.2 | Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance - | Based on the HCV assessment report mentioned in 5.2.1, there was no RTE species identified. Nonetheless, regular patrols within the estates were carried out and findings recorded by the respective estate. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Signage that prohibit hunting, fishing and water polluting activities was verified on-site at the visited estates and found to be satisfactorily maintained | Complied |

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| 5.2.3 | There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance - | The program to regularly educate the workforce was established and incorporated with the annual training programme. HCV Training was found to be conducted by all the visited estates where training records were well maintained and made available for verification. | Complied |
| 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 - | Among the management plan established for 2019 were: <ul style="list-style-type: none"> • to create awareness among employees and surrounding communities with regards to HCV. This can be evident through training records e.g. records dated 29/2/2019 and meeting records with smallholders dated 8/8/2019 • Maintaining the bund without the usage of agrochemicals | Complied |
| 5.2.5 | Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance - | There is no HCV set-asides with existing rights of local communities. | Complied |
| Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner. | | | |

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| 5.3.1 | <p>All waste products and sources of pollution shall be identified and documented. - Major compliance -</p> <p>The waste products and sources of pollution were documented in Sustainable Plantation Management System Appendix 9 Procedure for Handling of Domestic Waste version 1, year 2008, issue no. 1, dated 1 October 2008.</p> <p>In POM, 3 types of waste were identified –</p> <ul style="list-style-type: none"> • Scheduled waste, • Domestic waste and • Industrial waste. These categories include: effluent, fibre/shell, EFB, decanter solid, boiler ash and etc. <p>In estate, similar method of waste identification were used. Waste identification cover all types of waste generated from the different station from the estate.</p> | Complied |

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| <p>5.3.2 All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p> | <p>The disposal of used lubricants and containers were done in accordance with the SW regulations. This can be evident through verification of consignment notes for scheduled wastes i.e. at Flemington POM: #0133001 (SW322), #0133003 (SW110), #0133004 (SW), #0133006 (SW409), #0133005 (SW418), #0133004 (SW305) & #0133002 (SW410), where all of them were sent to an authorised collector on 23/4/2019. The receiving facility acknowledged receipt on 24/4/2019.</p> <p>Apart from that, clinical wastes were also disposed in accordance to scheduled wastes regulations. This can be evident through verification of consignment notes dated 19/6/2019 from Edgenta Mediserve Sdn Bhd at Sungai Samak Estate.</p> <p>Based on the visit at SW stores, it was found that the labelling of all SW was in accordance to legal requirements, good housekeeping and containers for keeping were durable.</p> <p>Verification on inventory generated from the eSWiS, e.g. DOE's Fifth Schedule #A31/152/000/048 (Flemington POM) dated June 2019, the physical quantity of the scheduled wastes was found to be consistent with the report.</p> | <p>Complied</p> |

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| 5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance - | <p>Waste management plan for 2019 was made available at all visited operating units. Based on the established plan, scheduled waste was found to be well managed with designated storage area at the mill and each estate in accordance with the legal requirements [EQA Act 1974 (SW) Reg., 2005]. Disposal of the scheduled wastes was through licensed collectors. Agrochemical containers were triple rinsed and punctured to avoid any misuse.</p> <p>Bagan Datoh, Sungai Samak, Sabak Bernam estates dispose their solid wastes at the landfill that managed by the <i>Majlis Perbandaran Teluk Intan</i> (Teluk Intan Municipal Council). The delivery of the waste can be evident through receipt issued by the council to the hired contractor for delivering the wastes to the landfill.</p> <p>If the estate is to have their own landfill, the "landfill Management in Estate" [SD/SDP/PSQM(ESH)/203-EN7, dated 13/3/2017] is to be referred to.</p> | Minor |
| Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised. | | |
| 5.4.1 A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance - | <p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of grid supply (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler. Other effort to improve the consumption of non-renewable energy were regular maintenance of vehicles and machinery and continuously educate the operators/drivers in best practice.</p> | 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. | | |

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| 5.5.1 | There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance - | The Group policy of "Zero open burning" is enforced since July 2008. The operating units adhere to the policy of "Zero open burning" for any replanting in the estates. Based on visit at various years of replanting at all the estates, palms were observed to be felled, chipped and windrowed. No trace of open burning seen. | 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 - | Not applicable as no fire was used in preparing 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 - | Assessment of all polluting activities was conducted under Environmental Aspect Impact for identifying activities that contributes significant impact to environment. Among the gaseous emissions sources identified were smoke from boiler operation, methane from effluent treatment plant, fertiliser consumption and emission from fossil fuel engines to name a few. | Complied |
| 5.6.2 | Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance | A 5 years plan for GHG reduction [phase I, 20 mills (Malaysia)] was sighted. Programme such as feed in tariff (FIT), flaring, CNG, CaP, Co-gen was included in the plan. The Carbon Emission Reduction Strategy is the overall implementation plan that cuts across SDP's value chain-upstream, downstream and other related business. The group target is to reduce emission by 40% at 2021. | Complied |

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| <p>5.6.3 A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -</p> | <p>RSPO GHG calculator was used to calculate the GHG emission of the certification unit for 2018 performance. Verification of data through inspection of various records such as store issuance records and SAP system showed that the input data was authentic and verifiable.</p> <p>The mill has also conducted its emission monitoring through complying its DOE's compliance schedule (<i>Jadual Pematuhan</i>) and reports were well maintained for verification. Among the reports verified were:</p> <ul style="list-style-type: none"> • Stack sampling were conducted twice a year as per Compliance Schedule requirement. Verified following reports: <ul style="list-style-type: none"> - L-PG-AQ1805CSD-0423 dated 22/6/2018, result: 0.2272 gm/Nm³ for boiler #1 and 0.2584 gm/Nm³ for boiler #2 - L-PG-AQ1812CSD-0576 dated 4/2/2019, result: 0.1964 gm/Nm³ for boiler #1 and 0.1913 gm/Nm³ for boiler #2 | <p>Complied</p> |
| <p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p> | | |
| <p>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.</p> | | |
| <p>6.1.1 A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -</p> | <p>Social Impact Assessment has been conducted on 27/6 – 1/7/2016 for the whole SOU 4 Flemington which consisted of Flemington POM, Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate. The assessment was done by Sustainability Strategy Unit, PSQM Department. The methodology of the assessment was through document review, site observation and interview with sampled of stakeholders. The assessment has involved the participation of stakeholders such as government authorities, workers, contractors and local communities. Attendance list of the stakeholders involved was sighted.</p> | <p>Complied</p> |

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| 6.1.2 | There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance - | The assessment has involved the participation of affected stakeholders such as local communities, internal workers, contractors and government authorities. The attendance list was sighted. | Complied |

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| <p>6.1.3</p> | <p>Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -</p> | <p>Action Plan for Social Assessment was developed on 12/7/2019 by Flemington POM and Flemington Estate, 01/07/2019 at Bagan Datuk Estate, 10/01/2019 at Sungei Samak Estate, 02/07/2019 at Sabak Bernam Estate. Issues raised during stakeholder meeting and complaint records have been incorporated into the action plan. Examples:</p> <ol style="list-style-type: none"> 1. FFB lorry speeding during using government road between Sg Dulang – Tanah Lalang. PIC: Assistant in charge: contractor FFB–Fame Transportation Sdn Bhd (FPOM). 2. High risk of accident and hazard to estate workers while riding motorcycle without headlight going to Sg Dulang. PIC: Assistant Manager/Field Supervisor (FPOM). 3. Damage facilities and crowded workers was found in one house. PIC: Estate Management (BDE). 4. Discuss regarding annual leave for Bagan Datoh Div and Melentang Div. PIC: Estate & Union (BDE). 5. Issue on drug addict among estate workers/dependent. Manager invited brief on 18/09/2019 (SSE). 6. Desilting of Drain crossing Old Samak Division. Status: completed on 30/08/2018 (SSE). 7. Bad field road conditions that are potential health and safety risks. Status: road maintenance programme available for every FY and monitoring of roads was done regularly to ensure good accessibility (SBE). 8. Company fears allowing road access to communities and/or workers from surrounding estates might increase security risk, e.g. theft, illegal harvesting/fishing. Status: map is available and access point for the smallholders to our roads are well maintained, monitored and recorded by our AP’s. The AP’s also consistently patrolling the boundaries and the main access point gate (SBE). 9. Delay payment to contractor from Oct to Dec 2018. Status: Management to ensure Contractor sent invoice to HQ immediately after work completed. Contractor to inform estate management if | <p>Complied</p> |
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| | | payment delay 15 day from invoice date. This is completed in January 2019 (FE). | |
| 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 plan is reviewed annually and updated with action, time frame and status accordingly. Review been made include the inputs from gender committee, safety, transportation, etc. The latest review was conducted on 12/07/2019 in Flemington POM and 01/02/2019 in Bagan Datuk Estate, 10/01/2019 at Sungei Samak Estate, 02/07/2019 at Sabak Bernam Estate and 13/07/2019 at Flemington Estate. | Complied |
| 6.1.5 | Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance - | There was no scheme smallholder involved in the certification units. | Not applicable |
| Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties. | | | |
| 6.2.1 | Consultation and communication procedures shall be documented. - Major compliance - | Sime Darby Plantation Berhad has developed Procedure for External Communication, Sime Darby Plantation Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 1/11/2008. The procedure has outlined the process of handling complaints from stakeholders and the time frame for external communication to be dealt with. The time frame to provide feedback is within two weeks from the date of receipt of communication and within one week of the completion of the investigation. | Complied |

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| 6.2.2 | A management official responsible for these issues shall be nominated. - Minor compliance - | Assistant of Flemington POM, Bagan Datuk Estate has been appointed as Social Officer to handle issues related to social in the mill. Seen the appointment letter dated 15/7/2017 issued by Mill Manager (FPOM), 01/07/2019 issued by Estate Manager (BDE), 01/01/2019 issued by Estate Manager (SSE), 08/04/2019 issued by Estate Manager (SBE) and 01/01/2019 issued by Estate Manager (FE). | Complied |
| 6.2.3 | A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance - | Stakeholder list was sighted in the mill where the list has included local communities, government authorities, contractors and suppliers. Stakeholder meeting was conducted on 09/07/2019 with the participation of stakeholders such as school's representatives, contractors, local communities and government authorities in Flemington POM and Flemington Estate. In Bagan Datuk Estate, the stakeholder meeting was conducted on 19/02/2019 to all 19 people. In Sungei Samak Estate, the stakeholder meeting was conducted on 18/07/2019 to 23 attendees, 21/06/2019 in Sabak Bernam Estate. Meeting minutes was sighted and issues were reported during the meeting. The issues reported have been incorporated into the Action Plan of Social Assessment. | Complied |
| 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. | | | |
| 6.3.1 | The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance - | Sime Darby Plantation Berhad has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 1/11/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. | Complied |

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| 6.3.2 | <p>Documentation of both the process by which a dispute was resolved and the outcome shall be available.</p> <p>- Major compliance –</p> | <p>Flemington POM has implemented Defect of Housing complaint form to allow the workers to fill in the form if there are any issues related to housing repair. Other than that, internal & external complaint book is established for any other complaints.</p> <p>Example:</p> <ul style="list-style-type: none"> a. Water pipe leaking (FPOM), status: completed on 09.07.2019. b. Underground piping broken (FPOM), status: completed on 25.06.2019 c. Broken toilet door (BDE), status: completed on 16.07.2019. d. Pipe broken (BDE), status: completed on 15.07.2019. e. Flood at Kampung Baru Sg Manila near the border of field 05DA due to Watergate not functioning, status: discussed with JPS Officer after investigation, the issue is come from JPS Watergate (SSE). f. Broken lamp & plug: completed on 21/6/2019 and 25/03/2019 (SBE). g. Bedroom lamp broken: completed on 12/07/2019 (FE). | Complied |
| <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> | | | |
| 6.4.1 | <p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.</p> <p>- Major compliance -</p> | <p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 and issue date: 1/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p> | Complied |

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| 6.4.2 | <p>A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.</p> <p>- Minor compliance -</p> | <p>SOP as per indicator 6.4.1.</p> <p>Besides, the company has implemented Social Policy dated January 2015 where they are committed to ensure that any negotiations concerning compensation for loss of legal or customary 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> | Complied |
| 6.4.3 | <p>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.</p> <p>- Major compliance -</p> | <p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> | Complied |
| <p>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.</p> | | | |

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| <p>6.5.1</p> | <p>Documentation of pay and conditions shall be available. - Major compliance -</p> | <p>Mill and estate have employed local and foreign workers. All the mill and estates workers are under direct employment. The pay slip has included basic pay, allowances, working days, deduction of salary such as Union, electricity, temple and mosque fund. Pay slip for February, April and June 2019 were sampled as below:</p> <ol style="list-style-type: none"> 1. Aminah Bt Mokmin (ID: 24802) – FPOM 2. Ramgi Karki (ID: 96139) – FPOM 3. Raimi (ID: 117509) – FPOM 4. Nor Azlan (ID: 144581) – FPOM 5. Uttam Kumar (Contract) – FPOM 6. Fakrul (Contract) – FPOM 7. Saddam Hossain (ID: 92570) – BDE 8. Thet Zaw Tun (ID: 100742) – BDE 9. Intajul Mallick (ID: 101590) – BDE 10. Moslem Uddin Miah (ID:116910) – BDE 11. Rengasamy A/L Govindasamy (ID: 21638) – BDE 12. Surono (ID: 63497) – SSE 13. Khalasi Almach (ID: 102230) – SSE 14. Purkait Lutfor (ID: 76912) – SSE 15. Abubacker Jamal Mydeen (ID: 76919) – SSE 16. Kumar (ID: 139263) – SSE 17. Jamilah Bt Arshat (ID: 20022) – SBE 18. Jay Ram Hasda (ID: 129127) – SBE 19. Saikat Bhattacharya (ID: 134064) – SBE 20. Budianto Ihsan (ID: 140132) – SBE 21. Pramanik Ariful Islam (ID: 107931) – SBE 22. Alam Parbag (ID: 108096) – FE 23. Geta (ID: 129175) – FE 24. Tarmizi Aprianto (ID: 136942) – FE 25. Molla Wasim Akram (ID: 144519) – FE | <p>Complied</p> |
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| | All the sampled workers have achieved the Minimum Wage Order 2018 of RM 1100/ month or RM 42.31/day. | |

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| <p>6.5.2</p> | <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -</p> | <p>Employment contract are available and explained in language that understood by workers. The contract was signed by the workers and sampled of contracts as below:</p> <ol style="list-style-type: none"> 1. Aminah Bt Mokmin (ID: 24802) – FPOM 2. Ramgi Karki (ID: 96139) – FPOM 3. Raimi (ID: 117509) – FPOM 4. Nor Azlan (ID: 144581) – FPOM 5. Uttam Kumar (Contract) – FPOM 6. Fakrul (Contract) – FPOM 7. Saddam Hossain (ID: 92570) – BDE 8. Thet Zaw Tun (ID: 100742) – BDE 9. Intajul Mallick (ID: 101590) – BDE 10. Moslem Uddin Miah (ID:116910) – BDE 11. Rengasamy A/L Govindasamy (ID: 21638) – BDE 12. Surono (ID: 63497) – SSE 13. Khalasi Almach (ID: 102230) – SSE 14. Purkait Lutfor (ID: 76912) – SSE 15. Abubacker Jamal Mydeen (ID: 76919)– SSE 16. Kumar (ID: 139263) – SSE 17. Jamilah Bt Arshat (ID: 20022) – SBE 18. Jay Ram Hasda (ID: 129127) – SBE 19. Saikat Bhattacharya (ID: 134064) – SBE 20. Budianto Ihsan (ID: 140132) – SBE 21. Pramanik Ariful Islam (ID: 107931) – SBE 22. Alam Parbag (ID: 108096) – FE 23. Geta (ID: 129175) – FE 24. Tarmizi Aprianto (ID: 136942) – FE 25. Molla Wasim Akram (ID: 144519) – FE <p>Interviewed with the workers confirmed that they were understood on the terms and conditions outlined in the employment contract. They were also briefed on the terms and condition during induction training.</p> | <p>Complied</p> |
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| 6.5.3 | <p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>- Minor compliance –</p> | <p>Line site inspection was conducted on weekly basis by the appointed staff by using the Housing Complex/ Crèche/ Community Hall Inspections form. Seen the records on weekly and monthly basis from Jan-June 2019 in Flemington POM, Bagan Datuk Estate, Sungei Samak Estate, Sabak Bernam Estate and Flemington Estate.</p> <p>Government treated water and electricity was supplied to the workers with charges according to the units. Clinic was available in the estate in order for the workers to get free treatment. There were government schools constructed inside the compound. In Sungei Samak Estate, the water for domestic usage is from treated water. Seen the microbiology water samples analysis dated 28/05/2019 (Report No: ML257/2019) with no detection of e-coli and total coliform. However, water analysis test conducted 23 May 2019 showed the result of total coliform is 6 MPN/100 ML at quarters sampling point while 236 MPN/100 ML at dispensary sampling point. Based on the NALCO (Laboratory) Personal Service Report dated 27/05/2019, it was detected that water pump is malfunction. Estate is in progress to call for supplier for repair for further action.</p> | Complied |
| 6.5.4 | <p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p> | <p>There were sundry shops located inside the estates’ compound. Price was displayed at foods and goods. Besides, some of the estates were nearby the town where they can easily access to the town to purchase for their daily goods. Interviewed with the workers found that the price inside the estates was slightly higher than the nearby shops in the town but still acceptable.</p> | Complied |
| <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> | | | |

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| 6.6.1 | A published statement in local languages recognising freedom of association shall be available. - Major compliance - | Sime Darby has implemented Social Policy dated January 2015 where the management is committed and respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively. The policy was developed in Bahasa Malaysia and English. Briefing of the policies was conducted on 24/06/2019 in Flemington POM and the policies was displayed at the notice board outside the office. Interviewed with the workers confirmed that they understood on the policy and aware that they are freely to join any association. | Complied |
| 6.6.2 | Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance - | There was meeting held between management and the Union representatives to discuss the issues related to workers on 18/7/2019 in Flemington POM, 02/01/2019 in Bagan Datuk Estate, 23/07/2019 in Sungei Samak Estate. Meeting minutes was sighted and issue discussed as below: <ol style="list-style-type: none"> 1. MC from government hospital need to have HA/VMO verification (FPOM). 2. Request to change the manual body temperature reader to digital reader (FPOM). 3. Drainage was broken at Flemington Division housing area (FPOM). 4. New approved annual leaves (BDE). 5. Water supply update (BDE). 6. Housing repair (SSE). 7. Job and salary on heavy raining season clarification (SSE). 8. Noise complaint during rest day on Sunday (SBE). 9. Request to have healthy activity for workers (SBE). 10. Ex-gratia and arrears for NUPW 2019 status (FE). 11. Increase the domestic waste collection frequency in line site (FE). <p>Interviewed with the Union’s representatives confirmed that no issue related to work and housing by the workers. All the workers will inform her if they have any issues.</p> | Complied |
| Criterion 6.7: Children are not employed or exploited. | | | |

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| 6.7.1 | There shall be documentary evidence that minimum age requirements are met. - Major compliance - | The company has developed Child Protection Policy and Social Policy dated January 2015 where they are committed to comply with the minimum age of employees. Briefing of the policies was conducted on 24/06/2019 in Flemington POM, and the policies was displayed at the notice board outside the office. Through document review on the Employee Master List confirmed that all the workers are above 18 years old. In Bagan Datuk Estate, the policy training was conducted on 07/02/2019, 26/02/2019 (Sungei Samak Estate), 29/06/2019 (Sabak Bernam Estate) and 17/07/2019 (Flemington Estate). | Complied |
| Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited. | | | |
| 6.8.1 | A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance - | SDPB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age. Briefing of the policies was conducted on 24/06/2019 in Flemington POM, 07/02/2019 in Bagan Datuk Estate, 26/02/2019 in Sungei Samak Estate, 29/06/2019 in Sabak Bernam Estate 17/07/2019 (Flemington Estate). The policies was displayed at the notice board outside the office. | Complied |
| 6.8.2 | Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance - | Interviewed with the workers consisted of different nationalities and different gender confirmed that they are treated equally without any discrimination. They are allowed to transfer of job station if they found they are unfit for the job offered. The workers were provided with standard treatment such as free medical treatment, fair overtime offered to all the workers whoever want to work and free housing to everyone. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| 6.8.3 | It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance - | Sime Darby Plantations Berhad has developed Workforce Management Unit Liaison & Recruitment (LR) Procedure with Doc. No. WMU/LR-SOPP/MARCH2016, rev. 0 dated 30/3/2016. The recruitment process was clearly stated in the procedure where the recruitment was based age, medical fitness and etc. There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. | Complied |
| Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected. | | | |
| 6.9.1 | Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance - | Sime Darby Plantation Berhad has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Briefing of the policies was conducted on 24/06/2019 in Flemington POM, 07/02/2019 in Bagan Datuk Estate, 26/02/2019 in Sungei Samak Estate, 29/06/2019 in Sabak Bernam Estate and 17/07/2019 (Flemington Estate). The policies was displayed at the notice board outside the office. | Complied |
| 6.9.2 | A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance - | SDPB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Briefing of the policies was conducted on 24/06/2019 in Flemington POM, 07/02/2019 in Bagan Datuk Estate, 26/02/2019 in Sungei Samak Estate, 29/06/2019 in Sabak Bernam Estate and 17/07/2019 (Flemington Estate). The policies was displayed at the notice board outside the office. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 6.9.3 | A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance - | Gender Committee was established in the mill which lead by the Office Clerk with total 8 members. Meeting was conducted once every 3 months and the last meeting was conducted on 19/6/2019 (FPOM), 24/04/2019 (BDE), 16/07/2019 (SSE), 28/06/2019 (SBE) and 19/07/2019 (FE). Meeting minutes was sighted and no issue has reported during the meeting. Apart from that, activity such as Gotong-Royong, sports, outdoor trip were conducted. Interviewed with the female workers confirmed that no case of sexual harassment or violence case reported. | Complied |
| Criterion 6.10: | | | |
| Growers and mills deal fairly and transparently with smallholders and other local businesses. | | | |
| 6.10.1 | Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance - | Mill has the agreement with agreed FFB price with outside crop (OCP) as stated in their agreement. Seen the agreement sampled as in 6.10.2 | Complied |
| 6.10.2 | Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance - | The mill has received outsider crops. Pricing of the FFB was displayed on the weighbridge on monthly basis. They have signed agreement with the mill and sampled of the agreement as below: Calculation of the pricing was detailing in the agreement, Third Schedule. | Complied |
| 6.10.3 | Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance - | Sampled of contract agreement/ letter of award of the contractors as below: 1. VR Plantation Sdn Bhd (Agreement No: P/P/0119/FFB01433L) valid from 1 st Jan 19 until 31 st Dec 2019. 2. Perniagaan Sinaran Mewah (Agreement No: P/P/0119/FFB01322L) valid from 1 st Jan 19 until 31 st Dec 2019. 3. Perniagaan Kelapa Sawit Hiap Thye (Agreement No: P/P/0110/FFB01316L) | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 6.10.4 | Agreed payments shall be made in a timely manner. - Minor compliance - | <p>The payment will be made on a monthly basis within thirty days from the date of receipt of invoice from the contractors. The payment was made by Head Office to the contractors directly. The payment was made promptly as per the agreement. Interviewed with the contractors confirmed that the payment will be made few days after they submitted the tax invoice to the estates. No delay in payment was reported.</p> <p>Sampled payment as below:</p> <ol style="list-style-type: none"> 1. Lotus two Enterprise, vendor no: 9001003646, company code: V501, doc no: 2100024044 date 17.04.2019 RM 5,960 for cleaning sterilizer 4 for inspection. 2. Perniagaan Kelapa Sawit Hiap Thye, Vendor No: 1001009344, company code: 6501, document no: 8400000791 dated 21.05.2019 amount RM 133,572.28. | Complied |
| <p>Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.</p> | | | |

| Criterion / Indicator | Assessment Findings | Compliance | |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| 6.11.1 | <p>Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.</p> <p>- Minor compliance –</p> | <p>The company has made contribution to the local communities and internal stakeholders such below:</p> <ol style="list-style-type: none"> 1. FPOM: contribution for Tabung Bantuan Kaki Palsu Aditia (Sabak Bernam Estate) dated 28.06.2019. 2. FPOM: EFB request from outside crop for organic mulching on 23.01.2019. 3. FPOM: EFB request from MARDI Bagan Datuk on 15.01.2019. 4. BDE: Donation to Hindu Temple (RM 400) on 15.05.2019. 5. BDE: Approval to use estate road for SM Sains Bagan Datoh marathon on 09.01.2019. 6. BDE: Donation (RM 200) for Takraw SMK Seri Muara on 23-24 Februari 2019. 7. SSE: Donation (RM 200) for Sepong Division Temple on March 2019. 8. SSE: Donation (RM 200) for Sg Dua Division Temple on Aug 2018. 9. SBE: Request for field levelling from SJK(T) Ladang Sabak Bernam on 15.07.2019 (SBE). 10. SBE: Request from smallholder to use estate field road for FFB evacuation on 23/01/2018 (SBE). 11. Request for water tank and tractor with trailer for temple prayers on 09.07.2019 (FE). 12. Request for crusher run at temple compound on 18.02.2019 (FE). | <p>Complied</p> |

| Criterion / Indicator | Assessment Findings | Compliance | |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| 6.11.2 | <p>Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.</p> <p>- Minor compliance –</p> | <p>The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers. Contract of employment in their national language was signed by the workers prior to work. Sampled of foreign workers with valid work permit as below:</p> <ol style="list-style-type: none"> 1. Permit no: PH74K1235900111 valid until 18 Sep 2019 (FPOM). 2. Permit no: PI5TH4701900111 valid until 07 Jun 2020 (Contract-FPOM). 3. Permit no: PH7VP0108900111 valid until 07 Oct 2019 (FPOM). 4. Permit no: PH9512718900111 valid until 19 Sep 2020 (Contract-FPOM). 5. Permit no: PI1PK3102900111 valid until 22 Apr 2020 (BDE). 6. Permit no: PH7RI1914900I16 valid until 27 Oct 2019 (BDE). 7. Permit no: PI4A91639900116 valid until 25 Jun 2020 (BDE). 8. Permit no: PHC303818900111 valid until 15 Jan 2020 (SSE). 9. Permit no: PHB8L4828900116 Valid until 16 Dec 2019 (SSE). 10. Permit no: PHB8L4822900116 valid until 16 Dec 2019 (SSE). 11. Permit no: PI42P5102900116 valid until 27 May 2020 (SSE). 12. Permit no: PI1AJ4845900111 valid until 12 Mar 2020 (SSE). 13. Permit no: PH9PQ0551900116 valid until 30 Nov 2019 (SBE). 14. Permit no: PH9PP0245900116 valid until 16 Nov 2019 (SBE). 15. Permit no: PI45N4336900111 valid until 30 May 2020 (SBE). 16. Permit no: PH9PP0245900116 valid until 16 Nov 2019 (SBE). 17. Permit no: PH7GN4135900116 valid until 12 Sep 2019 (FE). 18. Permit no: PI5OJ5548900111 valid until 02 Aug 2020 (FE). 19. Permit no: PH9JR3540900116 valid until 16 Nov 2019 (FE). <p>Interviewed with the foreign workers confirmed that they have freedom to go out from the compound during off day. They are volunteered to surrender the passport to the management for safety reason as they worried the passport will be lost if kept by themselves.</p> | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 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 - | Interviewed with the foreign workers confirmed that they have freedom to go out from the compound during off day. They are volunteered to surrender the passport to the management for safety reason as they worried the passport will be lost if kept by themselves. | Complied |
| 6.12.2 | Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance – | Interviewed with the foreign workers confirmed that the terms and conditions in the contracts they signed in home country were the same as they signed in Sime Darby. There was no contract substitution occurred. | Complied |
| 6.12.3 | Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance - | SDPB has implemented a Sime Darby’s Human Rights Charter on 13/1/2017, version 3.0 where they committed as below: a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. Ensuring favorable working conditions e. Enhancing Safety and Health Induction training was given to all the new workers during their arrival to the plantations. Company policy, terms and conditions stated in the employment contract and the culture of plantations were briefed to the new workers. Seen the attendance list of the new workers who have attended the induction training dated 22.09.2015 (Raimi – Flemington POM), 12.10.2013 (Ramgi Karki – Flemington POM), 02.07.2019 (Saddam Hossain – Bagan Datuk Estate), 10.09.2015 (Moslem Uddin Miah – Bagan Datuk Estate), 19.11.2014 (Ariful Islam – Sabak Bernam Estate), 07.12.2016 (Jay Ram Hasda – Sabak Bernam Estate), 01.06.2017 (Saikat Bhattacharya Sabak Bernam Estate) and 05.12.2016 (Geta – Flemington Estate). | 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 - | The Social and Humanity Management Policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations. Briefing of the policies was conducted on 24/06/2019 in Flemington POM, 07/02/2019 in Bagan Datuk Estate, 26/02/2019 in Sungei Samak Estate, 29/06/2019 in Sabak Bernam Estate and the policies was displayed at the notice board outside the office. | Complied |
| 6.13.2 | As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. | Not applicable in Peninsular Malaysia. | Not applicable |
| Principle 7: Responsible development of new plantings | | | |
| Flemington 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>Continuous Improvement Plan for Flemington POM and supply base was established. Sighted sample of CIP established as follow:</p> <p>Flemington Palm Oil Mill (based on Kaizen Charter):</p> <ul style="list-style-type: none"> • To reduce wheel loader rental cost at KKS Flemington • To reduce electricity usage supplied by TNB • To reduce diesel transportation cost • To improve on safety steriliser station return cages rail line • To improve on safety at production oil station • To reduce monthly oil loss/FFB <p>Estates (incorporated with objectives, target & programme):</p> <ul style="list-style-type: none"> • To communicate with stakeholders regarding the communication and whistle blower policy • To conduct safety campaign (safety town hall) in order to increase safety & health awareness • Reduce electricity consumption • Reduce diesel consumption • Upgrading of workers housing | <p>Complied</p> |

RSPO Public Summary Report
Revision 8 (Mar /2019)

Appendix B: Approved Time Bound Plan

SDP- RSPO Certification Status for Malaysia Operations

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

RSPO Public Summary Report
Revision 8 (Mar /2019)

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

RSPO Public Summary Report
Revision 8 (Mar /2019)

| SOU NO | Name of SOU | Location | Date of Certification | End Date of Certification | Certificate Number | Remarks |
|--------|-------------|------------------|-----------------------|---------------------------|-------------------------------|---------|
| 32 | Rajawali | Bintulu, Sarawak | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819167, RSPO 0020 | N.A |
| 33 | Derawan | Bintulu, Sarawak | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819169, RSPO 0019 | N.A |
| 34 | Pekaka | Bintulu, Sarawak | 30 Dec '11 | 29-Dec-21 | CU-RSPO-815150, MUTU-RSPO/054 | N.A |

Legends

Certification Withdrawal

NA - NOT APPLICABLE

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

SDP- RSPO Certification Status for Indonesia Operations

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

RSPO Public Summary Report
Revision 8 (Mar /2019)

| NO | Name of PT | Name of Mill | Location | Date of Certification | End Date of Certification | Certificate Number | Remarks |
|----|-----------------------------------------------|----------------|-------------------------------------------------------------------|-----------------------|---------------------------|--------------------|----------------------------------------------------------|
| 11 | PT GUTHRIE PECCONINA | RANTAU PANJANG | Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan | 16-Mar-12 | 19-Nov-22 | MUTU-RSPO/017 | N.A |
| 12 | PT LAGUNA MANDIRI | RANTAU | Sungai Durian, Kotabaru, Kalimantan Selatan | 30-Dec-11 | 30-Dec-16 | MUTU-RSPO/009 | N.A |
| 13 | | BETUNG | | 1-April-14 | 1-April-19 | MUTU-RSPO/035 | |
| 14 | PT INDOTRUBA TENGAH | SEKUNYIR | Kalimantan Tengah, Indonesia | 23-Nov-10 | 22-Nov-20 | MUTU-RSPO/001 | N.A |
| 15 | PT SWADAYA ANDIKA | SELABAK | Sungai Durian, Kotabaru, Kalimantan Selatan | 16-Mar-12 | 15-Mar-17 | MUTU-RSPO/015 | Cert. discontinued – supply bases extended to Rantau POM |
| 16 | PT BINA SAINS CEMERLANG | SG PINANG | Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan | 11-Sep-12 | 28-Nov-22 | MUTU-RSPO/020 | N.A |
| 17 | PT TEGUH SEMPURNA | PEMANTANG | Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah | 9-Sep-16 | 8-Sep-21 | MUTU-RSPO/004 | N.A |
| 18 | PT BHUMIREKSA NUSA SEJATI | TELUK BAKAU | Pelangiran, Sg. Guntung, Indragiri Ilir, Riau | 01-Dec-16 | 30-Nov-21 | MUTU-RSPO/008 | N.A |
| 19 | | MANDAH | | 1 April 2014 | 1 April 2019 | MUTU-RSPO/036 | |
| 20 | PT ANEKA INTIPERSADA | TELUK SIAK | Tualang, Perawang, Siak, Riau | 8-Dec-16 | 7-Dec-21 | MUTU-RSPO/007 | N.A |
| 21 | PT TAMACO GRAHA KRIDA | UNGKAYA | Witaponda, Kolonodale, Morowali, Sulawesi Tengah | 10-Jul-12 | 28-Dec-22 | MUTU-RSPO/018 | N.A |
| 22 | PT SIME INDO AGRO | BK AJONG | Kalimantan Barat, Indonesia | 18-Jul-16 | 17-Jul-21 | MUTU-RSPO/088 | N.A |
| 23 | PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI | BLANG SIMPO | Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam | 3-May-13 | 3-May-18 | MUTU-RSPO/026 | N.A |
| 24 | PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI | LEMBIRU | Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat | 3-Jul-14 | 2-Jul-19 | MUTU-RSPO/044 | N.A |
| 25 | PT MITRAL AUSTRAL SEJAHTERA | MAS Mill | Desa Rahayu Kec. Parindu Kab. Sanggau, Kalimantan Barat | NA | NA | NA | N.A |

**RSPO Public Summary Report
Revision 8 (Mar /2019)**

Legends

| | | |
|----------------------------------------|--------------|--------|
| Pending Certification by RSPO EB | Mill down | closed |
|----------------------------------------|--------------|--------|

NA - NOT APPLICABLE

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2018** for **Flemington 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 **Flemington Palm Oil Mill** and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 1.43 |
| PKO | 1.43 |

| Extraction | % |
|------------|-------|
| OER | 20.27 |
| KER | 5.54 |

| Production | t/yr |
|--------------|------------|
| FFB Process | 183,094.94 |
| CPO Produced | 43,057.17 |
| PKO Produced | 11,765.68 |

| Land Use | Ha |
|-----------------------------|------------------|
| OP Planted Area | 25,302.81 |
| OP Planted on peat | 502.68 |
| Conservation (forested) | 0 |
| Conservation (non-forested) | 0 |
| Total | 25,805.49 |

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 | 101,586.93 | 0.56 | 4708.15 | 0.46 | - | - | 106,295.08 | 1.02 |
| CO ₂ Emission from fertilizer | 9,973.8 | 0.05 | 443.62 | 0.04 | - | - | 10,417.42 | 0.05 |
| NO ₂ Emission | 12,880.75 | 0.07 | 331.31 | 0.03 | - | - | 13,212.06 | 0.1 |
| Fuel Consumption | 1,268.81 | 0.01 | 57.7 | 0.01 | - | - | 1,326.51 | 0.02 |
| Peat Oxidation | 27,446.33 | 0.15 | 0 | 0 | - | - | 27,446.33 | 0.15 |
| Sink | | | | | | | | |
| Crop Sequestration | -96,237.27 | -0.53 | -4,429.95 | -0.44 | - | - | 100,667.22 | 0.97 |
| Conservation Sequestration | - | - | - | - | - | - | - | - |
| Total | 56,919.35 | 0.31 | 1,110.83 | 0.1 | - | - | 58,030.18 | 0.41 |

*Note: Includes both estates and smallholders

RSPO Public Summary Report
Revision 8 (Mar /2019)

Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 16,316.78 | 0.08 |
| Fuel Consumption | 53.96 | 0 |
| Grid Electricity Utilisation | 793.30 | 0 |
| Credit | | |
| Export of Grid Electricity | 0 | 0 |
| Sales of PKS | 0 | 0 |
| Sales of EFB | 0 | 0 |
| Total | 17,164.04 | 0.08 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO ₂ e |
|--------------------------------|--------------------|
| PK from own mill | 16,797.99 |
| 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 (%) | 5 |
| Divert to anaerobic diversion (%) | 95 |

| POME Diverted to Anaerobic Digestion: | |
|----------------------------------------------------|----|
| Divert to anaerobic pond (%) | 33 |
| Divert to methane captured (flaring) (%) | 0 |
| Divert to methane captured (energy generation) (%) | 67 |

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. | Sime Darby Plantation headquarter has the physically handle the RSPO Certified Sustainable oil palm products. All trading, contract and sales are managed by Global Trade Marketing department at Sime Darby Plantation, HQ and held the PalmTrace registration number for respective mill. PalmTrace ID for Flemington Oil Mill: RSPO_PO1000000294. | 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. | Flemington 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. | Sime Darby Plantation Bhd held RSPO membership number: 2 10008-04-000-00 since 06 September 2004. Company has registered in PalmTrace system as follows: Members ID – Flemington Oil Mill: RSPO_PO1000000294. Licensee valid until 4/10/2019 Member category : Oil Mill | Yes |
| 5.1.4 | Processing aids do not need to be included within an organization’s scope of certification. | Processing aids are not used in the milling process. | N/A |
| 5.2 Supply chain model | | | |

| | | | |
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| 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. | <p>Flemington POM has received FFB from own certified supplying estates and non-certified outsider crops and smallholders. Seen the List of Supplying FFB (Group) and Supplying FFB (OCP). Declassification of the CPO or PK was done in accordance to the correct order.</p> <p>During the period of August 2018 to June 2019, Flemington Palm Oil Mill has received and processed FFB from: Own certified supplying estates= 168,107.35 MT Certified diversion crops from group’s estates= 10,096.84 MT Non-certified crops from outsider & smallholders= 43,858.41 MT</p> | Yes |
| 5.2.2 | The site can use one (1) or a combination of supply chain models as audited and certified by the CB. | Flemington POM was certified with Module E: Mass Balance Module. | Yes |
| 5.3. Documented Procedures | | | |
| 5.3.1 | <p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. | <p>Sime Darby Plantation Berhad has develop Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019 to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. The following subjects were included in the procedure:</p> <p>4.0 Responsibilities 5.0 Control of Documents & Records 6.0 Delivery of FFB from the Estate 7.0 Receiving FFB at the Mill 9.0 Process Monitoring 10.0 Products Despatch</p> | Yes |

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| | | <p>11.0 Non-conforming Products and/ or Documents 12.0 Product Claims 13.0 Outsourced Contractor 14.0 Training 15.0 Reclassification of Mill’s Supply Chain Model 16.0 Production Volume 17.0 Conversion Factors 18.0 Internal Audit 19.0 Complaints 20.0 Management Review</p> | |
| | <ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). | <p>Among the records included in the procedures are:</p> <ul style="list-style-type: none"> i. Weighbridge tickets ii. Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document iii. Daily production summary report iv. Record and balance v. Training records for SCCS <p>All the records were found to be up-to-date.</p> | <p>Yes</p> |
| | <ul style="list-style-type: none"> • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard. | <p>The Mill Manager has the overall responsibility for the implementation of the SCCS requirements. The Manager has appointed Assistant Engineer 1 as person-in-charge for monitoring of the mass balance incoming and outgoing, sustainable and non-sustainable material. Appointment letter dated 18/3/2019 was sighted. Interviewed with the Assistant Engineer 1 confirmed that he was able to demonstrate the implementation of their procedures in accordance to the standard.</p> | <p>Yes</p> |

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| 5.3.2 | <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> | <p>Sime Darby Plantation Berhad has developed Internal Audit Procedure, Doc. No.: SD/SDP/PSQM/IAP, Rev. 2 dated 1/11/2017. Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019, Section 18.0 where the annual internal audit is to determine the mill conforms to the requirements of RSPO and MSPO SCCS. The frequency of the internal audit was at least annually.</p> | Yes |
| | <p>ii) effectively implements and maintains the standard requirements within its organization</p> | <p>The last internal audit was carried out on 6/32019 by Sustainability Unit, GSQM. Seen the internal audit checklist and internal report found that 2 Major non-conformance was raised. Corrective action has taken accordingly to rectify the non-conformance.</p> | Yes |
| 5.4. Purchasing and goods in | | | |
| 5.4.1 | <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number | <p>When FFB delivered to the mill from the estates, the transporters presented weighbridge tickets to the mill weighbridge clerk in order the FFB to be received by the mill. Sampled of the weighbridge tickets as below:</p> <p><u>Diversions FFB from certified supplying bases</u> <u>Ladang Sabrang</u></p> <ul style="list-style-type: none"> • The name and address of the buyer: M174 – M-Flemington • The name and address of the seller: Ladang Sabrang • The loading or shipment/delivery date: 23/4/2019 • The date on which the documents were issued: 23/4/2019 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): FFB A Crop • The quantity of the products delivered: 8,840 kgs • Any related transport documentation: BAY8055 • Supply Chain certificate number of the seller: RSPO 0015 • A unique identification number: Weighbridge Ticket# 65046 | Yes |

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| | | <p><u>Ladang Seri Intan</u></p> <ul style="list-style-type: none"> • The name and address of the buyer: Flemington POM • The name and address of the seller: Ladang Seri Intan • The loading or shipment/delivery date: 27/4/2019 • The date on which the documents were issued: 27/4/2019 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): FFB A Crop • The quantity of the products delivered: 10,500 kgs • Any related transport documentation: WDM8564 • Supply Chain certificate number of the seller: RSPO 0015 • A unique identification number: FFB Consignment Note# 86855 <p><u>FFB from own certified supplying bases</u></p> <p><u>Sungei Samak Estate</u></p> <ul style="list-style-type: none"> • The name and address of the buyer: M174 – M-Flemington • The name and address of the seller: Sungei Samak Estate • The loading or shipment/delivery date: 23/7/2019 • The date on which the documents were issued: 23/7/2019 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): FFB A Crop • The quantity of the products delivered: 10,690 kgs • Any related transport documentation: WDN 6155-24 • Supply Chain certificate number of the seller: RSPO 590802 • A unique identification number: Weighbridge Ticket# 32169 <p><u>Flemington Estate</u></p> <ul style="list-style-type: none"> • The name and address of the buyer: Flemington POM • The name and address of the seller: Flemington Estate | |
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**RSPO Public Summary Report
Revision 8 (Mar /2019)**

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| | | <ul style="list-style-type: none"> • The loading or shipment/delivery date: 23/7/2019 • The date on which the documents were issued: 23/7/2019 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): FFB A Crop • The quantity of the products delivered: 1,458 bunches • Any related transport documentation: WAU 1537 • Supply Chain certificate number of the seller: RSPO 590802 • A unique identification number: FFB Consignment Note# 60383 • • <u>FFB from own certified supplying bases</u> • <u>Sungei Samak Estate</u> <ul style="list-style-type: none"> • The name and address of the buyer: M174 – M-Flemington • The name and address of the seller: Sungei Samak Estate • The loading or shipment/delivery date: 23/7/2019 • The date on which the documents were issued: 23/7/2019 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): FFB A Crop • The quantity of the products delivered: 10,690 kgs • Any related transport documentation: WDN 6155-24 • Supply Chain certificate number of the seller: RSPO 590802 • A unique identification number: Weighbridge Ticket# 32169 • <u>Flemington Estate</u> <ul style="list-style-type: none"> • The name and address of the buyer: Flemington POM • The name and address of the seller: Flemington Estate • The loading or shipment/delivery date: 23/7/2019 • The date on which the documents were issued: 23/7/2019 | |
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RSPO Public Summary Report
Revision 8 (Mar /2019)

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| | | <ul style="list-style-type: none"> • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): FFB A Crop • The quantity of the products delivered: 1,458 bunches • Any related transport documentation: WAU 1537 • Supply Chain certificate number of the seller: RSPO 590802 • A unique identification number: FFB Consignment Note# 60383 | |
| | <ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). | The information was available in various documents such as FFB consignment notes and weighbridge tickets. | Yes |
| | <ul style="list-style-type: none"> • The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping 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 maintained a List of FFB Supplier FY 2019 and kept a copy of the certificate of suppliers. This is applied to both own certified and certified diversion estates 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 Flemington Palm Oil Mill such as from SOU 5 Seri Intan was verified. Validity check was done prior to each FFB delivery. Seri Intan Palm Oil Mill with Certificate No.: RSPO 0015 valid until 2/3/2021 was sighted. | 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. | Not applicable as this part is applicable for supply chain actor after refinery. | N/A |

| | | | |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 5.4.2 | The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents. | Sime Darby Plantation Berhad has develop Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019, Section 11.0 has clearly stated the process of handling Non-Conforming Products and/ or Documents. The mill/ estate shall downgrade the materials following the downgrade order: RSPO: Identity Preserved -> Segregation -> Mass Balance -> Non-Certified. | |
| 5.5. Outsourcing activities | | | |
| 5.5.1 | <p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independence mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p> | <p>Flemington POM is using 3rd party transporter for CPO to buyers. The 3rd party transporter physically handled the palm product but the legal ownership is belong to Flemington POM of all input materials. The company control from the gates on entry to and exit from the works and during filling operations and at loading stations.</p> <p>Contract covering the outsourced activities with the contractor, Jasa Korporat Sdn Bhd was sighted. Seen the extended contract with Ref. No.: T/PEN/CPO/0215/001 dated 1/5/2019 which valid until 30/4/2020. The said contractor has acknowledged on the addendum of RSPO/ MSPO/ SCCS dated 2/7/2019 where the contractor need to follow the guideline in accordance with the Sime Darby Plantation of Mill Quality Management System. Besides, the transporter has been given training on SCCS & Mass Balance on 27/6/2018.</p> | Yes |
| 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 on production, warehouse and storage tank. | N/A |

| | | | |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| | b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. | Not applicable. No outsourcing activity on production, warehouse and storage tank. | N/A |
| | c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. | Not applicable. No outsourcing activity on production, warehouse and storage tank. | N/A |
| | d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance. | Not applicable. No outsourcing activity on production, warehouse and storage tank. | N/A |
| 5.5.3 | The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. | Not applicable. No outsourcing activity on production, warehouse and storage tank. | N/A |
| 5.5.4 | The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products. | Not applicable. No outsourcing activity on production, warehouse and storage tank. | 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; | <p>Flemington POM ensured the required information is available in document form. There was no sales of certified CPO since last audit. Only 1 sale of certified PK sold.</p> <p>Sampled of CSPK contract: S/C-PSD/1903/PK0139 dated 1/3/2019, Quantity: 400 MT (Shipment Month: March 2019)</p> <p><u>Shipment on 7/3/2019:</u></p> <ul style="list-style-type: none"> The name and address of the buyer: XXXXX | Major nonconformance |

| | | | |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| | <ul style="list-style-type: none"> • 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 | <ul style="list-style-type: none"> • The name and address of the seller: Flemington POM, Teluk Intan • The loading or shipment/ delivery date: 7/3/2019 • The date on which the documents were issued: 7/3/2019 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Palm Kernel RSPO MB • The quantity of the products delivered: 33.43 MT • Any related transport documentation: Collection Order (PK)# 65542 • Supply chain certificate number of the seller: MSPO 682042 • A unique identification number: Despatch Ticket# 016133 <p><u>Shipment on 15/3/2019:</u></p> <ul style="list-style-type: none"> • The name and address of the buyer: XXXXX • The name and address of the seller: Flemington POM, Teluk Intan • The loading or shipment/ delivery date: 15/3/2019 • The date on which the documents were issued: 15/3/2019 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Palm Kernel RSPO MB • The quantity of the products delivered: 29.10 MT • Any related transport documentation: Collection Order (PK)# 49111 • Supply chain certificate number of the seller: NIL • A unique identification number: Despatch Ticket# 016163 | |
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| | | Weighbridge tickets (W/B# 016150, 016151, 016155, 016156, 016163, 016165, 016170 and 016169) were not stated the RSPO Certificate Number. Besides, weighbridge tickets (W/B# 016116, 016128, 016129, 016133 and 016135) were stated with wrong RSPO Certificate Number (MSPO 682042) for the contract of S/C-PSD/1903/PK0139 with product Palm Kernel RSPO MB. | |
| | <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). | All the information could be found in various documents such as sales contract, mill weighbridge tickets and transporter collection orders. | Yes |
| | <ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. | <p>Based on the announcement summary, all the registrations were found to be in order. Seen the transaction ID# TR-3470c0a5-ee3a that confirmed on 13/5/2019 for total 400 MT.</p> <p>There was one provisional sales that completed the delivery on 18/4/2019 to Sime Darby KCP for total 400 MT. The final sales of certified products will be confirmed by refinery or KCP later. Therefore, no announcement was made yet in the PalmTrace as shipment from KCP has not deliver yet.</p> | 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 carried out by the Sime Darby Global Trade Marketing Department, HQ. All transaction will be registered in the Palm Trace. | Yes |

| | | | |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 5.7.2 | The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: | Based on the announcement summary, all the registrations were found to be in order. Total registered transaction (extracted from Palm Trace) summarized as per below: CPO: 0 MT PK: 400 MT Detailed transaction can be found under table. | Yes |
| | <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. | | |
| | <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 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 FY2019 was sighted where RSPO training (included RSPO SCCS) has included into the plan. | Yes |
| 5.8.2 | Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed. | Training on RSPO SCCS was conducted on 8/7/2019 to all the personnel such as weighbridge operator, auxiliary police and the operation workers. Seen the attendance list and training material of the training. Interviewed with the weighbridge operator found that he is able to demonstrate the | Yes |

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| | | understanding of RSPO SCCS. Besides, training of SCCS & Mass Balance for Transporter was conducted on 27/6/2018. | |
| 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. | The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019. | 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. Last year's average form August 2018 to June 2019 were OER: 25.00% and KER: 6.43%. | 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. | 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. | No off-product claim made by Flemington POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc). | 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) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. 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. | Not applicable as no off-product claim made by Flemington POM as to date. | N/A |
| 4.3 | In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products. | Not applicable as no off-product claim made by Flemington POM as to date. | N/A |
| 4.4 | Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products. | Not applicable as no off-product claim made by Flemington POM as to date. | N/A |

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| 4.5 | Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat. | No evidence of RSPO corporate logo used by Flemington POM and verified through document and site review (notice board, business card, shipping documentation, procurement/purchasing document and promotional material etc). | Yes |
| Business to business communications | | | |
| 5.1 | Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products. | Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. | Yes |
| 5.2 | When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made. | Shipping documentation verified and conformance with the requirements of RSPO SCCS. Sampled the weighbridge ticket for the delivery of certified PK, it stated with product – Palm Kernel RSPO MB. However, the RSPO Certificate Number is not stated in the documents. Non-conformity details refer to Indicator 5.6.1. | Yes |
| 5.3 | Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. | Flemington POM is not under distributor or wholesaler category. Thus, this requirement is not applicable. | N/A |

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| 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> | <p>Flemington 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.</p> | 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> | <p>No business to consumer communication on product specific claim made Flemington POM and only producing crude and unfinished product. This is not applicable for POM.</p> | 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> | <p>No business to consumer communication on product specific claim made Flemington POM and only producing crude and unfinished product. This is not applicable for POM.</p> | N/A |
| 6.3 | <p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p> | <p>No business to consumer communication on product specific claim made Flemington POM and only producing crude and unfinished product. This is not applicable for POM.</p> | N/A |
| 6.4 | <p>Business to consumer communication shall not include information about the claimant's RSPO membership status.</p> | <p>No business to consumer communication on product specific claim made Flemington POM and only producing crude and unfinished product. This is not applicable for POM.</p> | N/A |
| 6.5 | <p>Members shall not communicate to consumers information about their suppliers' RSPO membership status.</p> | <p>No business to consumer communication on product specific claim made Flemington POM and only producing crude and unfinished product. This is not applicable for POM.</p> | N/A |

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| 6.6 | Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient. | No business to consumer communication on product specific claim made Flemington 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 Flemington 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 applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org . | No business to consumer communication on product specific claim made Flemington POM and only producing crude and unfinished product. This is not applicable for POM. | N/A |
| MODULE B – MASS BALANCE SPECIFIC RULES | | | |
| Minimum Mass Balance content (MB) | | | |
| | 95% or above of the oil palm content must be RSPO MB-certified. | Flemington POM is producing crude palm products. | Yes |
| | Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the | Flemington POM is producing crude palm products. | Yes |

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| | requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits. | | |
| 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 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. • 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. | Flemington POM is producing crude palm product and does not involved in any labelling of end product. | Yes |
| 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. | Flemington POM is producing crude palm product and does not involved in any labelling of end product. | Yes |

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| | <ul style="list-style-type: none"> 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. | | |
| | <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <p>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p> | Flemington POM is producing crude palm product and does not involved in any labelling of end product. | Yes |
| 5.12. Complaints | | | |
| 5.12.1 | The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints. | Sime Darby Plantation Berhad has established Procedure for External Communication, Appendix 5.5.3.2, Version 1, Issue date: 1/11/2008 to put in a place a system to effectively communicate with external interested parties on matters pertaining to the mill. Any stakeholder complaints received by the mill will be handled in accordance to the SOP. As to date, there is no any complaint raised. | 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. | Sime Darby Plantation Berhad has develop Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019, Section 20.0 where management review will be reviewed annually. The last management review meeting was carried out on 7/3/2019 which chaired by Mill Manager. | 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. | <p>Seen the meeting minutes found the following agenda was discussed:</p> <ul style="list-style-type: none"> Results of internal audits covering RSPO Supply Chain Certification Standard | Yes |

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| | <ul style="list-style-type: none"> • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. | <ul style="list-style-type: none"> ➢ 2 Major NC raised during the internal audit conducted on 6/3/2019. • Customer feedback <ul style="list-style-type: none"> ➢ No issue/ complaint received from customers. • Status of preventive and corrective actions <ul style="list-style-type: none"> ➢ All NCs raised were closed and no outstanding issues. • Follow-up actions from management reviews <ul style="list-style-type: none"> ➢ Previous management review meeting only discussed audit finding and not the RSPO SCCS related matters. Mill will carry out management review meeting inclusive of RSPO SCCS related matter. • Changes that could affect the management system <ul style="list-style-type: none"> ➢ No issue. • Recommendations for improvement <ul style="list-style-type: none"> ➢ No issue. | |
| 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>The output of the following was discussed during the meeting.</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. | Yes |

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

| E.1 Definition | | | |
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| | Requirement | Evidence For any N/A raised, justification is required. | Compliance (Yes / No or N/A) |
| E.1.1 | Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB. | Flemington POM receives and processes both certified and non-certified FFB. The mill is using Module E: Mass Balance Module. During the SCCS assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. Diversion crops received from other certified estate from August 2018 to May 2019. | 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. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report. | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. (Refer to 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). | The registration of PalmTrace will be carried out by the Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Company has registered their mill in the PalmTrace: Members ID – Flemington Oil Mill: RSPO_PO1000000294. Licensee valid until 4/10/2019 Member category : Oil Mill | Yes |

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| | | The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization. | |
| E.3 Documented procedures | | | |
| E.3.1 | <p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a. Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> | <p>Sime Darby Plantation Berhad has develop Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019 to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. The following subjects were included in the procedure:</p> <p>4.0 Responsibilities 5.0 Control of Documents & Records 6.0 Delivery of FFB from the Estate 7.0 Receiving FFB at the Mill 9.0 Process Monitoring 10.0 Products Despatch 11.0 Non-conforming Products and/ or Documents 12.0 Product Claims 13.0 Outsourced Contractor 14.0 Training 15.0 Reclassification of Mill's Supply Chain Model 16.0 Production Volume 17.0 Conversion Factors 18.0 Internal Audit 19.0 Complaints</p> | Yes |

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| | | 20.0 Management Review | |
| | b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard. | The Mill Manager has the overall responsibility for the implementation of the SCCS requirements. The Manager has appointed Assistant Engineer 1 as person-in-charge for monitoring of the mass balance incoming and outgoing, sustainable and non-sustainable material. Appointment letter dated 18/3/2019 was sighted. Interviewed with the Assistant Engineer 1 confirmed that he was able to demonstrate the implementation of their procedures in accordance to the standard. | Yes |
| E.3.2 | The site shall have documented procedures for receiving and processing certifies and non-certified FFBs. | Sime Darby Plantation Berhad has develop Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019 to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. | Yes |
| E.4 Purchasing and goods in | | | |
| E.4.1 | The site shall verify and document the volumes of certified and non-certified FFBs received. | <p>Daily records are prepared at the entry point at the weighbridge. Daily Production Summary Report and Monthly Crop Report documented for all the certified and non-certified crops. Records verified by internal and external audit. Sampled of the weighbridge tickets as below:</p> <p><u>Diversion FFB from certified supplying bases</u> <u>Ladang Sabrang</u></p> <ul style="list-style-type: none"> • The name and address of the buyer: M174 – M-Flemington • The name and address of the seller: Ladang Sabrang • The loading or shipment/delivery date: 23/4/2019 • The date on which the documents were issued: 23/4/2019 | Yes |

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| | | <ul style="list-style-type: none"> • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): FFB A Crop • The quantity of the products delivered: 8,840 kgs • Any related transport documentation: BAY8055 • Supply Chain certificate number of the seller: RSPO 0015 • A unique identification number: Weighbridge Ticket# 65046 <p><u>Ladang Seri Intan</u></p> <ul style="list-style-type: none"> • The name and address of the buyer: Flemington POM • The name and address of the seller: Ladang Seri Intan • The loading or shipment/delivery date: 27/4/2019 • The date on which the documents were issued: 27/4/2019 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): FFB A Crop • The quantity of the products delivered: 10,500 kgs • Any related transport documentation: WDM8564 • Supply Chain certificate number of the seller: RSPO 0015 • A unique identification number: FFB Consignment Note# 86855 <p><u>FFB from own certified supplying bases</u></p> <p><u>Sungei Samak Estate</u></p> <ul style="list-style-type: none"> • The name and address of the buyer: M174 – M-Flemington • The name and address of the seller: Sungei Samak Estate • The loading or shipment/delivery date: 23/7/2019 • The date on which the documents were issued: 23/7/2019 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): FFB A Crop • The quantity of the products delivered: 10,690 kgs | |
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| | | <ul style="list-style-type: none"> • Any related transport documentation: WDN 6155-24 • Supply Chain certificate number of the seller: RSPO 590802 • A unique identification number: Weighbridge Ticket# 32169 <p><u>Flemington Estate</u></p> <ul style="list-style-type: none"> • The name and address of the buyer: Flemington POM • The name and address of the seller: Flemington Estate • The loading or shipment/delivery date: 23/7/2019 • The date on which the documents were issued: 23/7/2019 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): FFB A Crop • The quantity of the products delivered: 1,458 bunches • Any related transport documentation: WAU 1537 • Supply Chain certificate number of the seller: RSPO 590802 • A unique identification number: FFB Consignment Note# 60383 <p><u>FFB from own certified supplying bases</u></p> <p><u>Sungei Samak Estate</u></p> <ul style="list-style-type: none"> • The name and address of the buyer: M174 – M-Flemington • The name and address of the seller: Sungei Samak Estate • The loading or shipment/delivery date: 23/7/2019 • The date on which the documents were issued: 23/7/2019 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): FFB A Crop • The quantity of the products delivered: 10,690 kgs • Any related transport documentation: WDN 6155-24 • Supply Chain certificate number of the seller: RSPO 590802 • A unique identification number: Weighbridge Ticket# 32169 | |
|--|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

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| | | <p><u>Flemington Estate</u></p> <ul style="list-style-type: none"> • The name and address of the buyer: Flemington POM • The name and address of the seller: Flemington Estate • The loading or shipment/delivery date: 23/7/2019 • The date on which the documents were issued: 23/7/2019 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): FFB A Crop • The quantity of the products delivered: 1,458 bunches • Any related transport documentation: WAU 1537 • Supply Chain certificate number of the seller: RSPO 590802 • A unique identification number: FFB Consignment Note# 60383 <p>Besides, the mill also received non-certified 3rd party crops. Sampled of the Delivery Orders as below:</p> <ol style="list-style-type: none"> i. 3rd Party: Perniagaan Kelapa Sawit Hiap Thye Date: 22/6/2019 DO No.: 11487 Weight: 12340 kg (gross weight) Weighbridge Ticket No. from Mill: 234656 ii. 3rd Party: Bagan Pasir Estate Date: 21/6/2019 DO No.: 12455 Weight: 971 bunches Weighbridge Ticket No. from Mill: 234590 | |
| E.4.2 | The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. | The facility is aware of this procedure. There was no projected overproduction for the period under license period from January 2019 to June 2019. | Yes |

| E.5 Record keeping | | | |
|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| E.5.1 | a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis by RSPO. | Daily records are prepared at the entry point at the weighbridge. Daily Production Summary Report and Monthly Crop Report documented for all the certified and non-certified crops. Records verified by internal and external audit. | Yes |
| | b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated | Computerized system in place with the delivery deducted accordingly. | Yes |
| | c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C. | Based on verification of Mass Balance Sheet accounting that the mill opted for three-monthly basis recording, there was no sales of certified products for since last audit. But it was found that the certified CPO was always delivered from positive stock. No negative stock recorded at the end of inventory period of 3 month. | Yes |

RSPO Public Summary Report
Revision 8 (Mar /2019)

Supply Chain Declaration *(Applicable For Appendix E)*

| A. Monthly Records of Certified and Uncertified FFB Received since the last audit (Aug 2018 – June 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 | August 2018 | 17,186.41 | 2,640.98 | 20,502.55 |
| 2 | September 2018 | 18,382.34 | 3,082.04 | 22,441.65 |
| 3 | October 2018 | 19,025.26 | 3,683.31 | 22,708.87 |
| 4 | November 2018 | 15,449.89 | 3,392.26 | 18,842.15 |
| 5 | December 2018 | 13,550.85 | 2,699.63 | 16,250.48 |
| 6 | January 2019 | 14,013.28 | 2,823.09 | 16,836.37 |
| 7 | February 2019 | 15,742.31 | 3,430.80 | 19,173.11 |
| 8 | March 2019 | 16,902.00 | 6,198.87 | 23,100.87 |
| 9 | April 2019 | 17,917.14 | 5,062.78 | 22,979.92 |
| 10 | May 2019 | 15,905.84 | 6,158.53 | 22,064.37 |
| 11 | June 2019 | 12,476.14 | 4,686.12 | 17,162.26 |
| | Total | 176,551.46 | 43,858.41 | 222,062.60 |

| B. Monthly Records of Certified CPO & PK since the last audit | | | |
|--------------------------------------------------------------------------|---------------------|---------------------------|--------------------------|
| No. | Month - Year | Certified CPO (mt) | Certified PK (mt) |
| 1 | August 2018 | 3,641.97 | 982.39 |
| 2 | September 2018 | 3,918.39 | 1,041.55 |
| 3 | October 2018 | 3,820.27 | 983.61 |
| 4 | November 2018 | 3,068.35 | 789.49 |
| 5 | December 2018 | 2,626.15 | 668.06 |
| 6 | January 2019 | 2,802.66 | 703.47 |
| 7 | February 2019 | 3,239.77 | 806.01 |
| 8 | March 2019 | 3,444.63 | 905.95 |
| 9 | April 2019 | 3,658.68 | 958.57 |
| 10 | May 2019 | 3,098.46 | 780.98 |
| 11 | June 2019 | 2,451.56 | 587.63 |
| | Total | 35,770.89 | 9,207.71 |

RSPO Public Summary Report
Revision 8 (Mar /2019)

| C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) | | | | |
|----------------------------------------------------------------------------------------------------------|-------------|----------------------------------|-------------------------|------------------------|
| No. | Buyers Name | Palmtrace Trading License Number | Certified CPO Sold (mt) | Certified PK Sold (mt) |
| 1. | Buyer 1 | - | - | 400.00 |

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

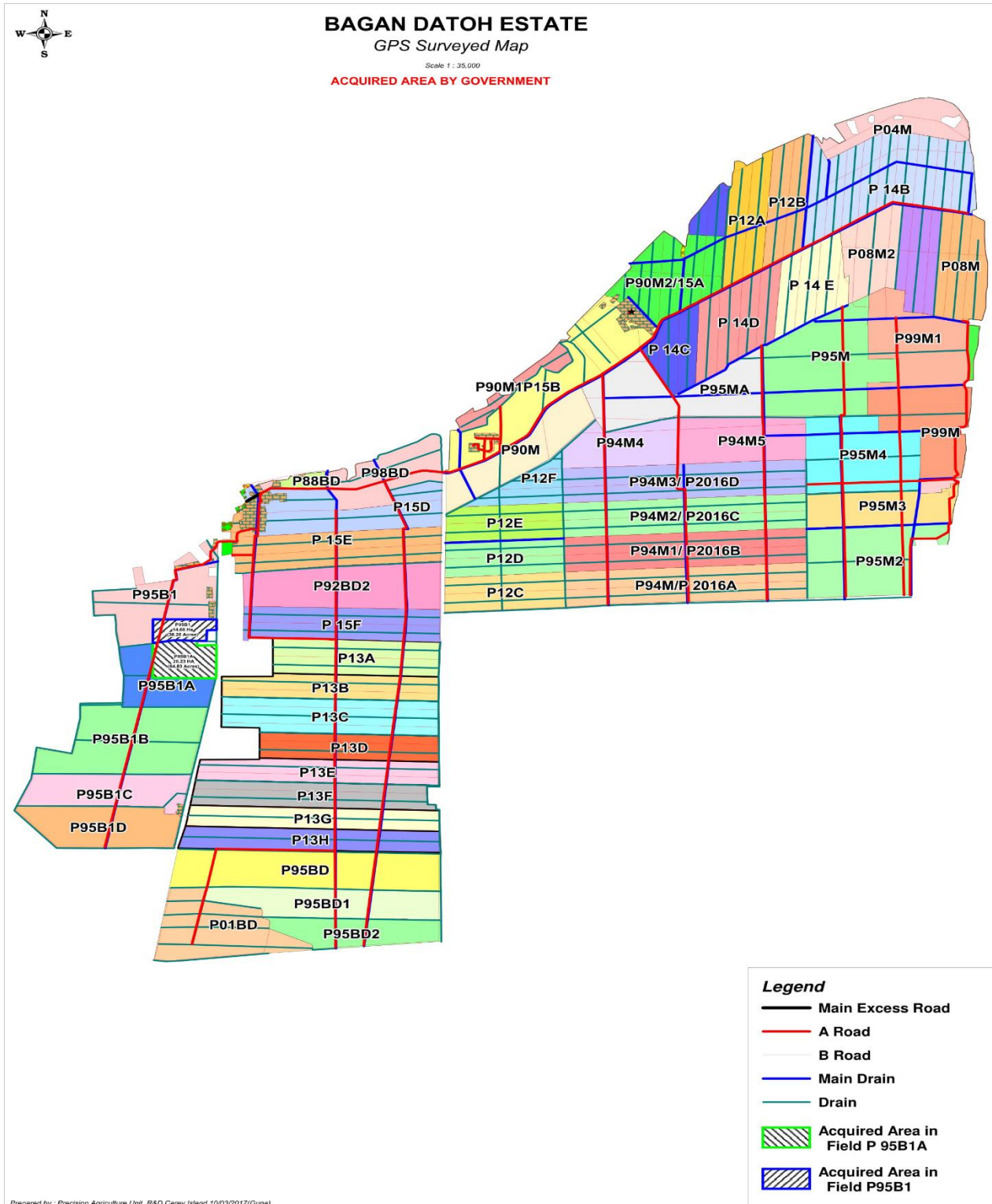
| E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) | | | | |
|------------------------------------------------------------------------------------------------|-------------|---------------|--------------|--|
| No. | Buyers Name | CPO Sold (mt) | PK Sold (mt) | |
| 1 | Buyer A | 11,535.91 | 1,351.10 | |
| 2 | Buyer B | 22,986.43 | 155.17 | |
| 3 | Buyer C | 183.55 | 398.08 | |
| 4 | Buyer D | 693.15 | 634.44 | |
| 5 | Buyer E | | 350.42 | |
| 6 | Buyer F | | 5,255.15 | |
| 7 | Buyer G | | 663.19 | |
| | Total | 35,399.05 | 8,807.55 | |

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

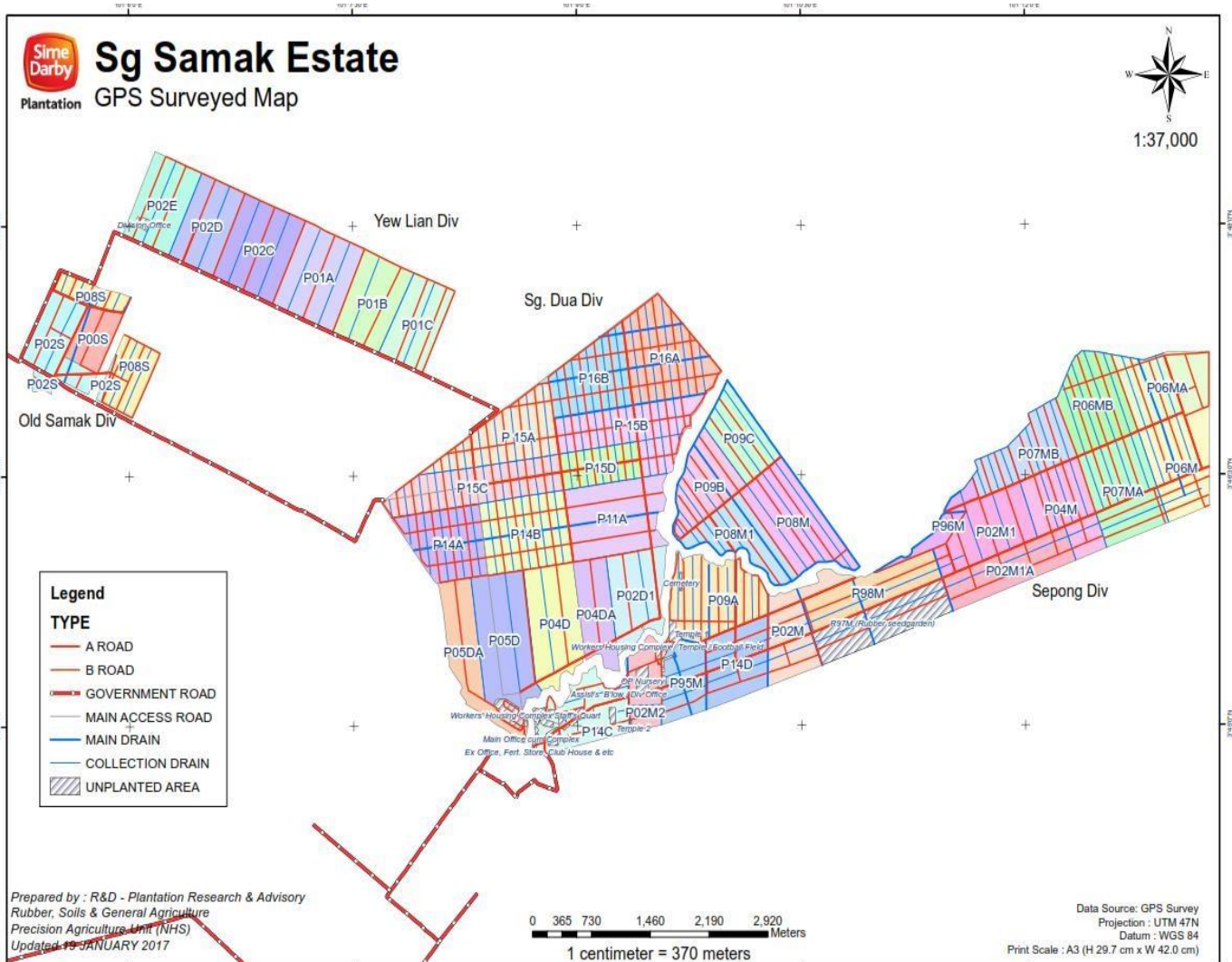
Appendix F: Location Map of Flemington Palm Oil Mill and Supply bases



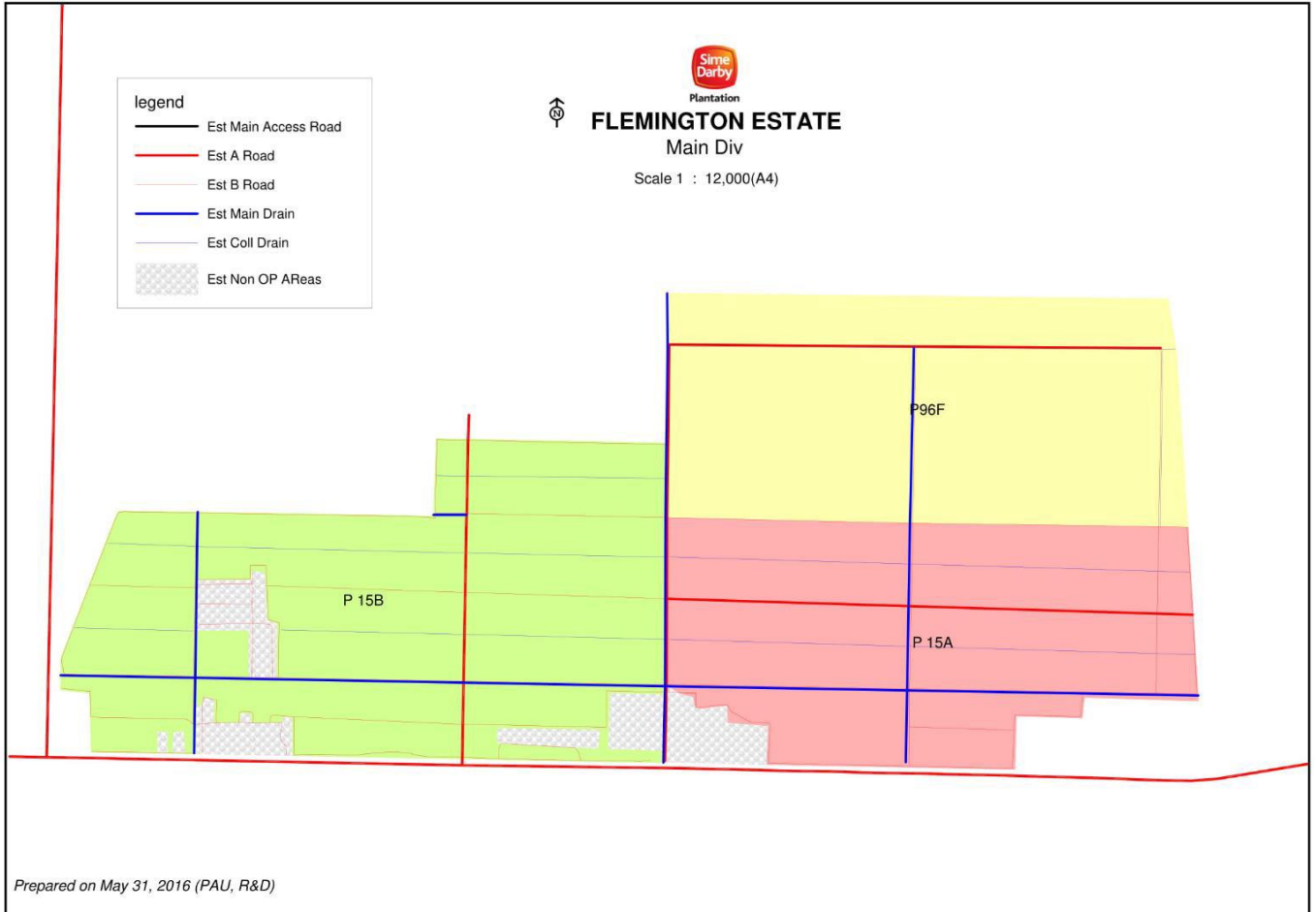
Appendix G: Bagan Datoh Estate Field Map



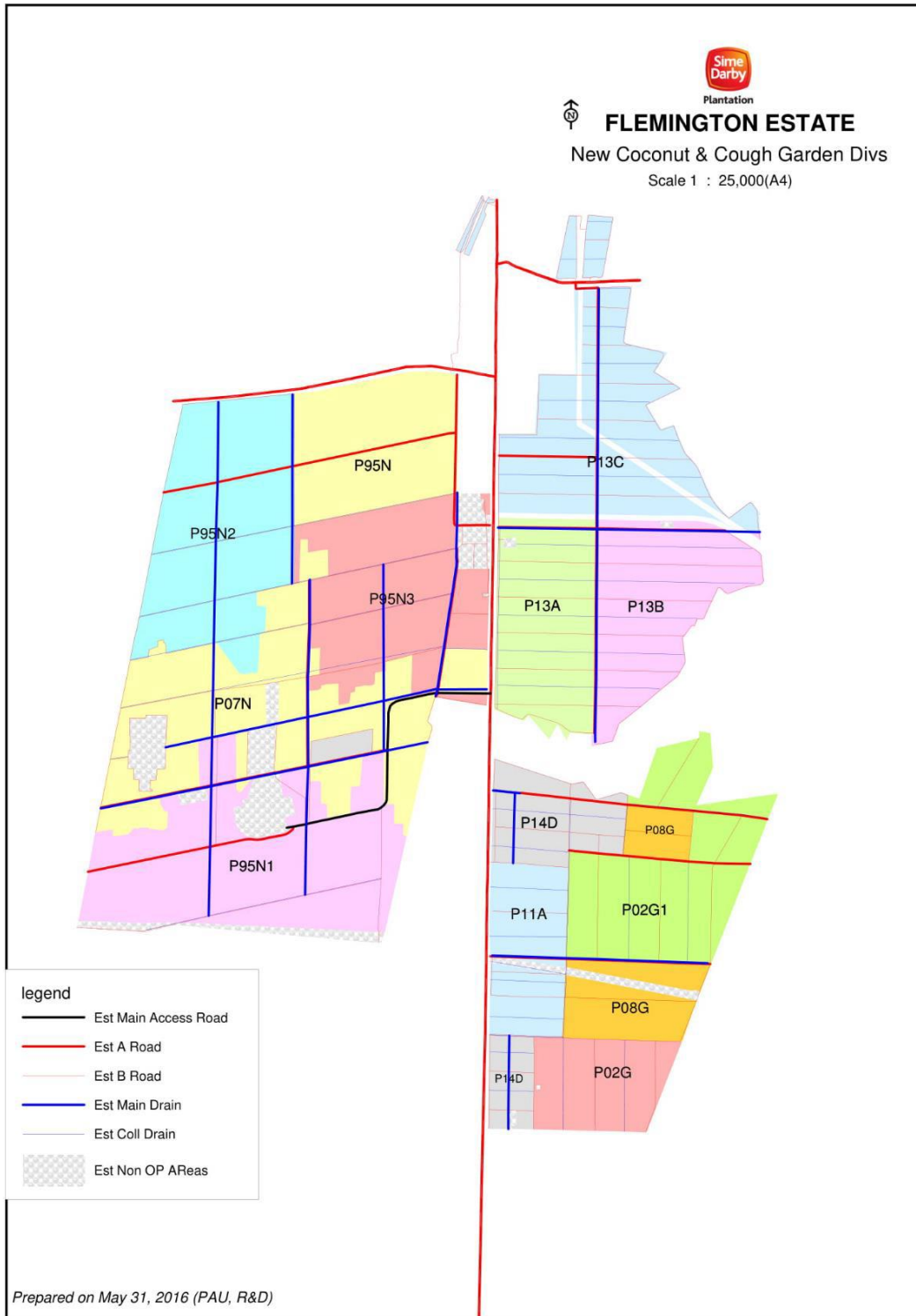
Appendix H: Sungai Samak Estate Field Map



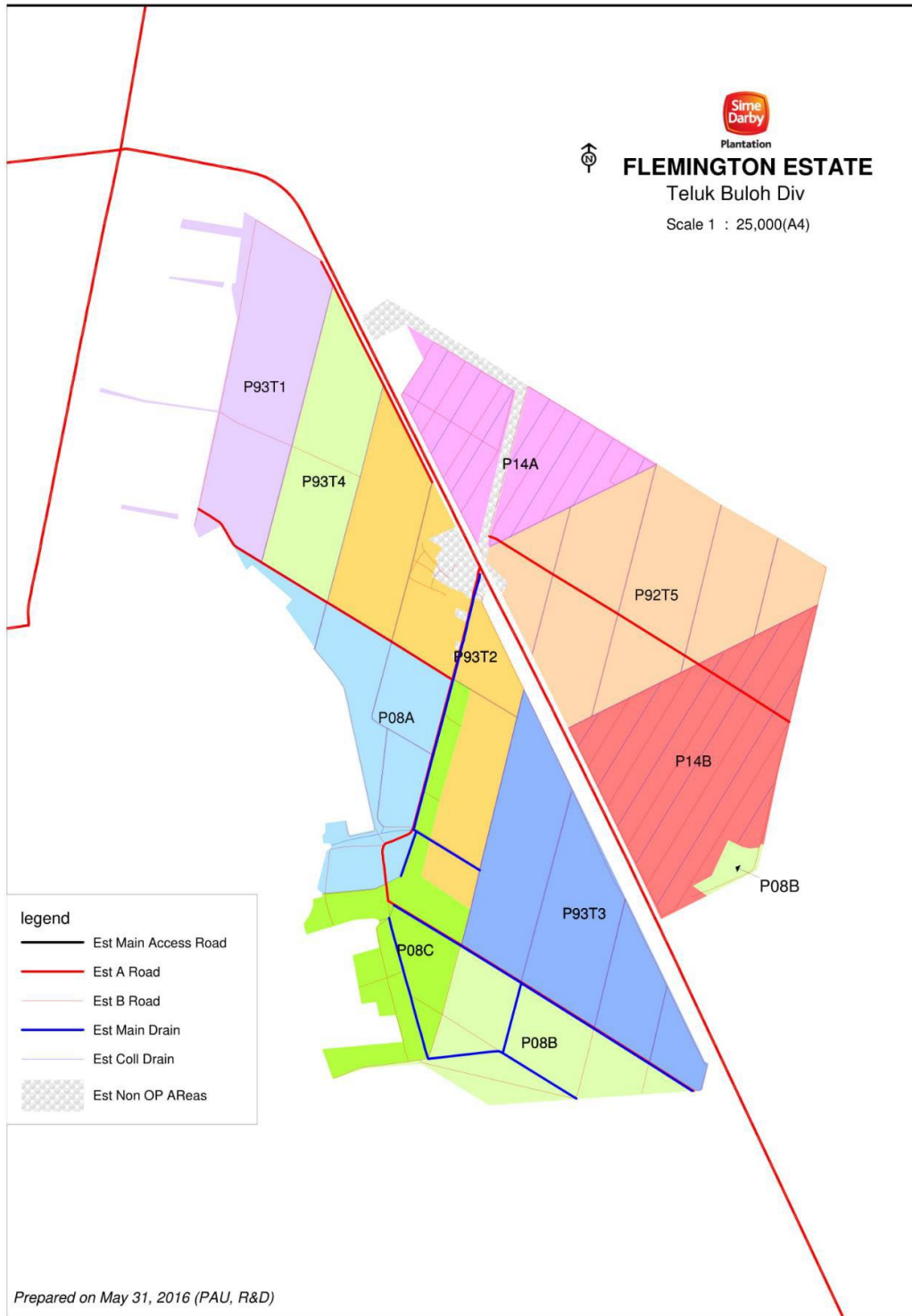
Appendix I: Flemington Estate Field Map



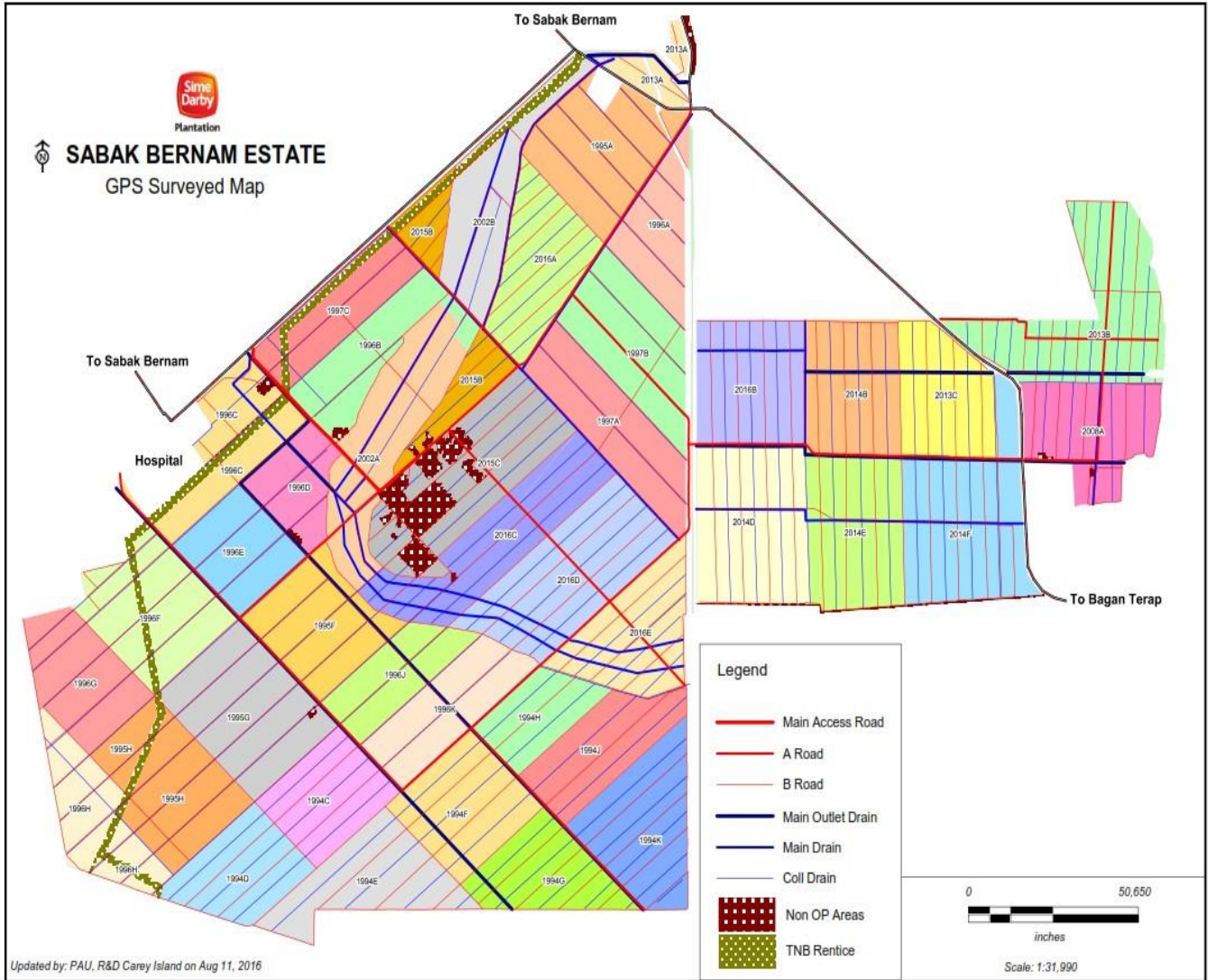
RSPO Public Summary Report
Revision 8 (Mar /2019)



RSPO Public Summary Report
Revision 8 (Mar /2019)



Appendix J: Sabak Bernam Estate Field Map



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

NA

Appendix L: List of Abbreviations

| | |
|------------|--------------------------------------------------------------------|
| a.i | Active Ingredient |
| BDE | Bagan Datoh Estate |
| 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 |
| FLE | Flemington Estate |
| FPOM | Flemington Palm Oil Mill |
| 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 |
| SBE | Sabak Bernam Estate |
| SSE | Sungai Samak Estate |
| SCCS | Supply Chain Certification Standard |
| SEIA | Social & Environmental Impact Assessment |
| SIA | Social Impact Assessment |
| SOP | Standard Operating Procedure |