

**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 22) Bukit Benut Palm Oil Mill and supply base
Location of Certification Unit: KM 12, Jalan Mengkibol 86009 Kluang, Johor Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	06/09/2004
Parent Company Name	Sime Darby Plantation Berhad		
Address	Level 3A, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
Subsidiary (Certification Unit Name)	Strategic Operating Unit (SOU 22) – Bukit Benut Palm Oil Mill		
Address	KM 12, Jalan Mengkibol 86009 Kluang, Johor, Malaysia		
Contact Name	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr. Anuar bin Zakaria (Mill Manager)		
Website	www.simedarbyplantation.com	E-mail	kks.bk.benut@simedarby.com
Telephone	+603-78484379 (Head Office) +6013-2086959 (Mill)	Facsimile	+603-78484356 (Head Office) +607-7766479 (Mill)

2. Certification Information			
Certificate Number	RSPO 591229	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 D)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682040	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	27/12/2022
MSPO 686845	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude

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Bukit Benut Palm Oil Mill	KM 12, Jalan Mengkibol 86009 Kluang, Kluang, Johor	1° 56' 00" N	103° 20' 28" E
Bukit Benut Estate	Ladang Bukit Benut 86009 Kluang, Johor	1° 54' 42" N	103° 21' 54" E
CEP Nyior Estate	Ladang CEP Niyor 86009 Kluang, Johor	1° 54' 30" N	103° 16' 22" E
Lambak Estate	Ladang Lambak/Elais 86009 Kluang, Johor	1° 58' 43" N	103° 19' 08" E

5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Benut Estate	2,580.43	24.18	196.52	2,801.13	92.12
CEP Nyior Estate	1,922.56	6.11	44.73	1,973.40	97.42
Lambak Estate	3,320.81	2.65	421.30	3,744.76	88.68
Total	7823.80	32.94	662.55	8519.29	92.12

**HCV category 4: Pond/River Reserve/ Water Catchment area which distributed among Lambak Elais, CEP Niyor, and Bukit Benut estates.*

6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Benut Estate	366.49	1,061.27	805.42	347.25	0	2,213.94	366.49
CEP Nyior Estate	0	667.37	963.58	291.61	0	1,922.56	0
Lambak Estate	437.77	1,158.31	1,483.13	241.6	0	2,883.04	437.77
Total (ha)	804.26	2,886.95	3,252.13	880.46	0	7,019.54	804.26

7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year		
	Estimated (Oct 2018-Sept 2019)	Actual (July 2018-July 2019)	Forecast (Oct 2019-Sept 2020)
Bukit Benut Estate	41,173.16	53,231.83	54,272.00
CEP Nyior Estate	38,423.78	2,453.99	4,909.00
Lambak Estate	41,735.66	70,127.56	79,400.00
Total	121,332.60	125,813.38	138,581.00

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8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (Oct 2018-Sept 2019)	Actual (July 2018-July 2019)	Forecast (Oct 2019-Sept 2020)
Cenas	N/A	172.24	N/A
Tun Dr Ismail		1,630.92	
CEP Renggam		6,769.59	
Sri Pulai		24.86	
Kulai		40.30	
Sembrong		34.86	
Ulu Remis		417.50	
Layang		15.47	
Total		9,105.74	

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (Oct 2018-Sept 2019)	Actual (July 2018-July 2019)	Forecast (Oct 2019-Sept 2020)
	Nil		
Total	Nil		

10. Certified Tonnage			
	Estimated (Oct 2018-Sept 2019)	Actual (July 2018-July 2019)	Forecast (Oct 2019-Sept 2020)
	Mill Capacity: 20 MT/hr	FFB	FFB
139, 632.60		134,919.12	138,581.00
SCC Model: IP	CPO (OER: 21.09%)	CPO (OER: 20.86%)	CPO (OER: 21.40%)
	29, 443.17	28,142.38	29,656.33
	PK (KER: 5.78%)	PK (KER: 5.43%)	PK (KER: 5.50%)
	8, 073.29	7,330.30	7,621.96

*Extension of volume CPO: 2,750 mt, PK: 1,400 mt, FFB: 18,300 mt

11. Actual Sold Volume (CPO)				
	RSPO Certified	Other Schemes Certified	Conventional	Total

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		ISCC	RSB		
CPO (MT)	15,628	0	0	11,708	27,336

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

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	2,350	0	0	4,743	7,093

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

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSP0	-	-
IS-CSPK0	-	-
IS-CSPKE	-	-

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
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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 31/07-03/08/2019. 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 Major NC close out on-site assessment was conducted on 02/10/2019. The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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

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

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

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

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

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

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)
Bukit Benut Palm Oil Mill	√	√	√	√	√
Bukit Benut Estate		√	√	√	√
CEP Nyior Estate	√	√	√	√	√
Lambak Estate	√		√	√	√

Tentative Date of Next Visit: July 23, 2020 – July 26, 2020

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

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Mohamed Hidhir Zainal Abidin	Team Leader	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.
Hu Ning Shing	Team Member	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.
Fadzli Masran	Team Member	Fadzli 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. Fadzli 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. Fluent in Bahasa Malaysia and English Language. He covered Mill & Estate Best Practices, Legal, OSH, Workers Consultation & etc.
Hafriazhar Mokhtar	Team Member	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has

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		been involved in RSP0 audits within Malaysia, Papua New Guinea, Solomon Islands and Gabon. During assessment, he covered the legal issues, social issues, worker’s welfare and stakeholder consultation. He is fluent in Bahasa Malaysia and English languages
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Accompanying Persons:

No.	Name	Role
	Nil	

2.3 Assessment Plan

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

PRELIMINARY AGENDA						
Date	Time	Subjects	MH	HNS	MF	HMM
Tuesday 30/7/19	PM	Audit team travel to Kluang. Check in at Anika Hotel, Kluang	√	√	√	√
Wednesday 31/7/2019	0730	Audit Team travelling Bukit Benut POM.	√	√	√	√
Bukit Benut Palm Oil Mill	0830	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). • Verification on previous audit findings 				
	09.00 – 13.00	Bukit Benut Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	-	-
	10.00 – 13.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-	-
	13.00 – 14.00	Lunch	√	√	√	√
	14.00 – 16.30	Bukit Benut Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	-	-

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PRELIMINARY AGENDA						
Date	Time	Subjects	MH	HNS	MF	HMM
	16.30-17.00	Interim Closing briefing and end of day 1	√	√	√	√
Thursday 1/8/2019	08.30 – 13.00	Continue with unfinished elements (Bukit Benut POM) Document Review P1 – P8: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	√	√	-	-
Bukit Benut POM and Lambak Estate	13.00 – 14.00	Lunch	√	√	√	√
	14.00 – 15.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	-	-
	14.00 – 16.30	Lambak Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	-	-
	16.30-17.00	Interim Closing Briefing and end of day 2	√	√	√	√
Friday 2/8/2019	8.30 – 13.00	Lambak 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.	√	√	-	-
Lambak Estate	13.00 – 14.00	Lunch	√	√	√	√
	14.00 – 16.30	Continue with unfinished elements Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	-	-
	16.30-17.00	Interim Closing Briefing and end of day 2	√	√	√	√
Wednesday 31/7/19	08.30 –13.00	Bukit Benut 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.	-	-	√	√
Bukit Benut Estate						

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PRELIMINARY AGENDA						
Date	Time	Subjects	MH	HNS	MF	HMM
	10.00 – 13.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	-	√
	13.00 – 14.00	Lunch	√	√	√	√
	14.00 – 16.30	Bukit Benut Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	-	-	√	√
	16.30-17.00	Interim Closing Briefing and end of day 1	√	√	√	√
Thursday 1/8/19 CEP Niyor and Bukit Benut Estate	8.30 – 13.00	Continue with unfinished elements 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).	-	-	√	√
	13.00 – 14.00	Lunch and travel back to CEP Niyor Estate	√	√	√	√
	14.30 – 16.30	CEP Niyor Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	-	-	√	-
	16.30 – 17.00	Interim Closing Briefing and end of day 2	-	-	-	√
Friday 2/8/19 CEP Niyor and Bukit Benut Estate	8.30 – 13.00	CEP Niyor 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.	-	-	√	√
	10.00 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	-	√
	12.00 – 13.00	Lunch	√	√	√	√

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PRELIMINARY AGENDA						
Date	Time	Subjects	MH	HNS	MF	HMM
	14.00 – 16.30	CEP Niyor Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	-	-	√	√
	16.30 – 17.00	Interim closing for day 3	√	√	√	√
Saturday 3/8/2019	08.30 – 12.00	Supply chain audit for Bukit Benut POM <ul style="list-style-type: none"> • General COC for supply chain • RSPO rules communication and claim • Module D: Identity Preserved 	√	√	-	-
Bukit Benut POM	12.00 - 13.00	Closing meeting. Presentation of finding	√	√	-	-
	13.00	End of audit and lunch	√	√	-	-
	PM	Audit team travel back to KL	√	√	-	-

Major NC Close Out Visit Plan

PRELIMINARY AGENDA		
Time	Subjects	Mohd Hidhir
PM	Audit Team travelling to Kluang. Check-in at Anika Hotel, Kluang	√
0730 AM	Travelling to Bukit Benut POM and Estate	√
08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Briefing on site verification plan 	
09.00 – 11.00	Bukit Benut Estate – Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	√
11.00 – 13.00	Bukit Benut POM – Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	√
13.00 – 14.00	Lunch break and travel to Yong Peng	√

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 entity/member under the RSPO and NBPOL is 100% RSPO Certified.	Yes

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	<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>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</p>	<p>Yes</p>

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	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 https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . The progress on the Liabilities shall be verified and reported.	Latest update based on RSPO Case Tracker (19 potential liabilities; 5 LUCA submitted, 1 LUCA is passed, 1 CN submitted, 1 CN approved) on LUCA submission stauts as per below table:	Yes

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	<p style="text-align: center;">SIME DARBY PLANTATION: LUCA SUBMISSION TIMELINE</p> <table border="1"> <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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Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No stakeholder comments or complaints received.	Yes																																																																									
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	None noted. No stakeholder comments or complaints received.	Yes																																																																									
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	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	Yes																																																																									

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

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC	Not applicable.	

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after two years, and a major NC if this requirement is not met after three years.		
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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 three (3) Major nonconformities & one (1) Minor nonconformity raised. The Bukit Benut Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1805554-201903-M1	Clause & Category (Major / Minor)	Indicator 4.4.2 Major
Date Issued	03/08/2019	Due Date	31/10/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	02/10/2019
Statement of Nonconformity:	The established riparian buffer zone was not effectively maintain		
Requirement Reference:	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.		
Objective Evidence:	The estate have established riparian buffer zone for Sungai Melantai at P10 C-5. During site visit at the riparian buffer zone, at water sampling point no 3 , there is evidence of chemical application along the riparian buffer zone established. In addition, the water sampling results for IE722/2019 dated 17/7/2019 and IE358/2019 dated 4/4/2019 was not conform to class IIA and IIB NWQS for natural waterways		
Corrections:	Spraying activity was stopped immediately. Reminder letter has been issued to mandore in-charge of the spraying gang and re-marking of the buffer zone area was done by Management. Training has been given to mandore, field staff and workers on 31/07/2019.		
Root Cause Analysis:	There is no supervision and monitoring by Field Mandore. The sprayer gang are new workers and training has not yet been given to them.		
Corrective Actions:	Refresher training will be conducted regularly and patrolling by AP once a month to ensure spraying activity is not conducted at buffer zone area and to ensure marking is always visible.		
Assessment Conclusion:	Major NC close out verification: i) Site verification P10C-5 has confirmed that the buffer zone area is now clearly demarcated with white painted circle and erection of signage at site and clearly visible.		

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	<p>ii) Latest training for dated 31/7/19 was sighted. This was further verified during interview with workers, mandore and AP on the understanding of buffer zone demarcation.</p> <p>iii) Monitoring of buffer zone was done by person in charge and AP. Latest monitoring records for September 2019 was checked. Based on the records AP patrolling, HCV checklist, no evidence of maintenance activity (spraying/manuring etc) found at buffer zone area.</p> <p>Corrective action taken is found to be effective, thus the major NC is closed on 2/10/19. Continuous implementation will be further verified in the next audit.</p>
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Summary of Total Number of Nonconformity																																				
Nonconformity																																				
NCR Ref #	1805554-201903-M2	Clause & Category (Major / Minor)	Indicator 2.1.3 Major																																	
Date Issued	03/08/2019	Due Date	31/10/2019																																	
Closed (Yes / No)	Yes	Date of nonconformity Closure	02/10/2019																																	
Statement of Nonconformity:	Mechanism to ensure the compliance was not implemented effectively.																																			
Requirement Reference:	A mechanism for ensuring compliance shall be implemented.																																			
Objective Evidence:	<p>As per the approval from JTK for the maximum overtime of 130 hours per month, the workers are not allowed to work more than 4 hours of overtime if work on rest day, public holiday and replacement of public holiday under Section (ii). However, document reviewed on the Daily Input Form in Bukit Benut POM found that the following workers worked more than 4 hours during work on rest day and public holiday.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Employee No.</th> <th style="width: 30%;">Date</th> <th style="width: 40%;">Hours of Overtime</th> </tr> </thead> <tbody> <tr><td>17465</td><td>21/01/2019</td><td>16</td></tr> <tr><td>17490</td><td>02/06/2019</td><td>10</td></tr> <tr><td>17498</td><td>02/06/2019</td><td>10</td></tr> <tr><td>17491</td><td>02/06/2019</td><td>8</td></tr> <tr><td>17503</td><td>02/06/2019</td><td>8</td></tr> <tr><td>124553</td><td>02/06/2019</td><td>10</td></tr> <tr><td>129037</td><td>02/06/2019</td><td>10</td></tr> <tr><td>136775</td><td>02/06/2019</td><td>10</td></tr> <tr><td>127198</td><td>16/06/2019</td><td>8</td></tr> <tr><td>29483</td><td>16/06/2019</td><td>8</td></tr> </tbody> </table> <p>Besides, one worker (Employee No.: 17470) found that continuously worked 48 hours from 14/1/2019 to 15/1/2019 as verified the punch card and Daily Input Form/ Overtime Request Form. He worked 8 hours normal working hour and 16 hours of overtime for two days consecutively. Interviewed with the worker told that he has rested 3.5 – 4 hours in the canteen. No evidence to show that the worker has enough rest to continue to continue to work for the next day.</p>			Employee No.	Date	Hours of Overtime	17465	21/01/2019	16	17490	02/06/2019	10	17498	02/06/2019	10	17491	02/06/2019	8	17503	02/06/2019	8	124553	02/06/2019	10	129037	02/06/2019	10	136775	02/06/2019	10	127198	16/06/2019	8	29483	16/06/2019	8
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127198	16/06/2019	8																																		
29483	16/06/2019	8																																		

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	Due to the recurring minor non-compliances on the same indicator occurred in successive surveillance audit, thus the minor upgraded to major as per RSPO P&C certification system requirements June 2017.
Corrections:	Mill management has issued a memo on 09/08/2019 regarding the working shift arrangement during Rest Day/Public Holiday for all workers & staff in order to ensure OT on rest day/public holiday is not exceeded 4 hours.
Root Cause Analysis:	Mill has received crop diversion from SOU 23 & 24 mainly for PQ crop processing which incurred higher overtime even on rest day/public holiday as to keep minimum crop balance.
Corrective Actions:	<ul style="list-style-type: none"> i. Mill has started the consent form for working on Rest Day/Public Holiday in March 2019 as per IOM dated 26/02/2019 from Head, Plantation Upstream Malaysia. ii. Mill already registered 2 fireman to seat for second grade boilerman examination. Herewith reference no for the said fireman JH/OYKDES/19/00697 & JH/OYKDES/19/00696 iii. Mill has established record for break time in mill which workers & staff whoever take break time inside the mill.
Assessment Conclusion:	<p>Major NC close out verification:</p> <ul style="list-style-type: none"> i) Consent form for working on Rest Day/Public Holiday in March 2019 as per IOM dated 26/02/2019 from Head, Plantation Upstream Malaysia has been fully implemented. Verified consent form application dated 18/8/19, 25/8/19, 7/9/19 and 22/9/19. ii) 2 fireman were registered for engine driver grade 2 examination on 1st October 2019. Refer to application letter; JH/OYKDES/19/00697 & JH/OYKDES/19/00696. iii) Break time record for August and September 2019 were verified. Hours of break time recorded and acknowledged by mill chargehand. iv) Check roll for August and September 2019 has shown no overtime exceeding 4 hours on rest day and public holiday. Monitoring of overtime is by the consent form to ensure approval was made prior to overtime on daily basis. This has been confirmed during interview with workers from boiler station and oil room on the current control mechanism for overtime. <p>Corrective action taken is found to be effective, thus the major NC is closed on 2/10/19. Continuous implementation will be further verified in the next audit.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1805554-201903-M3	Clause & Category (Major / Minor)	RSPO SCCS D 4.2
Date Issued	03/08/2019	Due Date	31/10/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	02/10/2019
Statement of Nonconformity:	No extension of volume requested for projected overproduction of certified tonnage.		
Requirement Reference:	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.		

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Objective Evidence:	Overproduction of certified tonnage recorded for the actual volume from July 2018 until July 2019; 134,919.13 mt which exceeded the registered certified tonnage of 121,332.60 mt.
Corrections:	Mill already liaised with GSQM team for extension of overproduction FFB against registered tonnage.
Root Cause Analysis:	Mill has received crop diversion from SOU 23 & 24 mainly for PQ crop processing.
Corrective Actions:	Mill to establish production monitoring template as to notify mill management if current production has reach 80% against registered tonnage.
Assessment Conclusion:	Major NC close out verification: i) Volume extension was requested by SQM HQ on 24/8/19 and has approved until end of license period. Total volume extension 130,132.6 mt CPO: 27,443.17 mt PK: 7,073.29 mt ii) New RSPO SCCS production monitoring was used. As of 30th September 2019, 85.75% of volume allocated has been used with the forecast until end of October 2019 (with volume extension) is still suffice. Corrective action taken is found to be effective, thus the major NC is closed on 2/10/19. Continuous implementation will be further verified in the next audit.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1805554-201903-N1	Clause & Category (Major / Minor)	Indicator 4.7.3 Minor
Date Issued	03/08/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Safe working practices was not adequately demonstrated.		
Requirement Reference:	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.		
Objective Evidence:	Observed at boiler station; Inadequate PPE and working tools used by 3 workers while installing the boiler front header cover. Manual lifting of steel plate was observed without proper working tools such as chain block as they are working on the boiler platform without body harness.		
Corrections:	Mill management had immediately stopped the work and issued SIME card to the workers.		
Root Cause Analysis:	Inadequate safety training for workers working at height		
Corrective Actions:	Training for the said workers has been provided regarding the safe working procedure (working at height). Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit.		

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Assessment Conclusion:	The proposed correction and corrective action to be taken were accepted. Effectiveness of the implementation shall be verified in the next assessment
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Opportunity for Improvements	
OFI #	Description
OFI 1	

Positive Findings	
PF #	Description
PF 1	

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity			
NCR Ref #	1655429-201807-M1	Clause & Category (Major / Minor)	Indicator 4.3.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	26/08/2018
Statement of Nonconformity:	No soil map available for newly acquired Talisman Division.		
Requirement Reference:	Maps of any fragile soils shall be available.		
Objective Evidence:	CEP Niyor Estate: Based on feasibility study by SID, Upstream/ASM dated December 2015, there is marginal shallow peat identified within estate with depth range of (50-100 cm). No soil map available to finalize the classification of soil categories at Talisman Division.		
Corrective Actions:	GSQM/RSQM to work closely with Strategic Department to ensure detailed soil map is available or conducted for all the newly acquired land immediately after sign-off of S&P agreement.		
Assessment Conclusion:	ASA1_3 verification: CEP Niyor Estate Latest soil sampling analysis was conducted in November 2018 including Talisman Division. 12 soil sampled was sent to Sime Darby Research laboratory for analysis. Refer test result no. S2/2019 dated 2/1/2019. Base on the soil analysis conducted, a soil map has been established. There were 10.00 ha of peat soils identified in the estate as per Soil Series Map issued by the R&D-TTAS – Precision Agriculture Unit dated 19/4/2019. No other soil categorised as problematic or fragile soil. Most soil series in the estate are as follows: Batu lapan, Bukit Temiang, Bungor, Durian, Gajah Mati, Gong Chenak, Harimau, Holyroad, Jerneh, Jitra, Kawang, Local Alluvium, Masai, Nami, Ocm, Peat, Rengam, Serdang, Tampoi, Tavy, Tebok, Terap, Ulu Tiram. The above information available for verification. No recurrence of issue found. Thus, the major NC is remain closed.		

Non-Conformity

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NCR Ref #	1655429-201807-N1	Clause & Category (Major / Minor)	Indicator 2.1.3 Minor
Closed (Yes / No)	No, upgraded to Major NC	Date of nonconformity Closure	n/a
Statement of Nonconformity:	Mechanism for ensuring compliance was not effectively implemented		
Requirement Reference:	A mechanism for ensuring compliance shall be implemented.		
Objective Evidence:	<p>Bukit Benut POM:</p> <p>i) Personal Chemical Exposure Monitoring (PCEM) – last monitoring was carried out in 8/12/16. As per assessor recommendation, Schedule II chemical (N-hexane) monitoring has to be carried out as per required frequency unless justified unnecessary by industrial hygiene technician.</p> <p>ii) Based on Noise Exposure Regulation 1989, under regulation 23, STS workers must be sent for retest within 3 month from the last date of monitoring. Date of monitoring was done on 18/9/17 however the retest was done on 8/1/18.</p>		
Corrective Actions:	<p>i) Personal Chemical Exposure Monitoring was carried out by Rank Chemical Sdn Bhd on 11.07.2018. Awaiting result from the vendor.</p> <p>ii) Mill management to ensure immediate action taken once received report from the OHD.</p>		
Assessment Conclusion:	<p>ASA1_3 verification: Last year PCEM was last carried out on 14/7/18. Exposure of n-hexane and inhalable dust was monitored for TWA8. Low PEL was reported. For 2019, the latest PCEM is schedule on August 2019. PO was issued for the said monitoring. Refer to PO no. 4300476742 issued to Rank Chemical Sdn Bhd.</p> <p>Retest for STS worker was done in December 2018 and within 3 months from the last date of monitoring in September 2018.</p> <p>Due to the recurring minor non-compliances on the same indicator occurred in successive surveillance audit, thus the minor upgraded to major as per RSPO P&C certification system requirements June 2017.</p>		

Non-Conformity			
NCR Ref #	1655429-201807-N2	Clause & Category (Major / Minor)	Indicator 4.2.3 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	03/08/2019
Statement of Nonconformity:	No evidence of periodic tissue and soil sampling to monitor changes in nutrient status for the new acquired area under Talisman Division.		
Requirement Reference:	There shall be evidence of periodic tissue and soil smapling to monitor changes in nutrient status.		
Objective Evidence:	CEP Niyor Estate: No soil sampling carried out for Talisman Division estate.		
Corrective Actions:	GSQM/RSQM to work closely with Strategic Department to ensure soil sampling is available or conducted for all the newly acquired land immediately after sign-off of SAP agreement.		
Assessment Conclusion:	ASA1_3 verification: CEP Niyor Estate		

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	<p>Latest soil sampling analysis was conducted in November 2018 including Talisman Division. 12 soil sampled was sent to Sime Darby Research laboratory for analysis. Refer test result no. S2/2019 dated 2/1/2019.</p> <p>No recurrence of issue found, thus the minor NC is effectively closed on 3/8/19.</p>
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Non-Conformity			
NCR Ref #	1655429-201807-N3	Clause & Category (Major / Minor)	Indicator 4.6.10 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	03/08/2019
Statement of Nonconformity:	Waste material disposal according to procedures were not being fully demonstrated.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated.		
Objective Evidence:	Bukit Benut Estate: Waste consists of used tyres, scrap metals and plastics were found being dumped improperly into the ravine by the road side at field Block # 10A opposite of housing area Zone C with about 300m distant.		
Corrective Actions:	To educate all workers housing residents on the waste management and disposal. Estate management to include monitoring of landfill area location within the estate compound in the 3 monthly site/workplace inspection.		
Assessment Conclusion:	<p>ASA1_3 verification: Bukit Benut Estate Domestic waste was collected twice a week and disposed at designated landfill located P00-2. The location selection as per the SOP established, SD/SDP/PSQM(ESH)/203-EN7 dated 13/3/2017. Sighted the records of domestic was collection for the month of May and June 2019.</p> <p>Recycle bin was provided at the linesite area. Noted during visit at the landfill area, no evidence of recycle waste and scheduled waste sighted in the landfill. Noted during site visit at the workshop area, the scrap metal and used tyre were stored in designated place before disposed through recycler.</p> <p>The estate continuously conduct training to the workers to create awareness on waste management. The waste management was communicated through signage, training and morning briefing. Sighted the morning briefing records recorded in morning briefing log book. Sighted the latest training records for 3R program conducted and linesite and housing area on 29/3/2019.</p> <p>No recurrence of issue found, thus the minor NC is effectively closed on 3/8/19.</p>		

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>1655429-201807-I1 Clause : Code of Conduct for members</p> <p>The latest Sime Darby Plantation Annual Communication of Progress (ACOP 2017) report on newly acquired concession sites need to be reflective of any that have changed ownership.</p>

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	ASA1_3 status: Latest update on the new acquired sites were reported in the latest ACOP, refer link https://rspo.org/view-acop-pdf/oil-palm-growers/Sime_Darby_Plantation_Berhad-ACOP2018.pdf
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3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1359037M1	2.1.1	Major	29/7/2016	Closed out on 5/9/2016
1359037M2	4.6.11	Major	29/7/2016	Closed out on 5/9/2016
1359037M3	6.5.2	Major	29/7/2016	Closed out on 29/9/2016
1359037M4	5.3.3	Major	29/7/2016	Closed out on 5/9/2016
1359037M5	SCC D2.2	Major	29/7/2016	Closed out on 5/9/2016
1359037N1	2.1.2	Minor	29/7/2016	Closed out on 21/07/2017
1359037N2	4.6.10	Minor	29/7/2016	Closed out on 21/07/2017
1359037N3	4.7.6	Minor	29/7/2016	Closed out on 21/07/2017
1503698-201707-N1	6.5.3	Minor	21/07/2017	Closed out on 06/07/2018
1503698-201707-N2	6.9.3	Minor	21/07/2017	Closed out on 06/07/2018
1503698-201707-N3	5.1.2	Minor	21/07/2017	Closed out on 06/07/2018
1503698-201707-N4	4.7.3	Minor	21/07/2017	Closed out on 06/07/2018
1503698-201707-N5	4.7.5	Minor	21/07/2017	Closed out on 06/07/2018
1655429-201807-M1	4.3.1	Major	06/07/2018	Closed out on 26/08/2018
1655429-201807-N1	2.1.3	Minor	06/07/2018	Upgraded to Major NC
1655429-201807-N2	4.2.3	Minor	06/07/2018	Closed out on 03/08/2019
1655429-201807-N3	4.6.10	Minor	06/07/2018	Closed out on 03/08/2019
1805554-201903-M1	4.4.2	Major	03/08/2019	Closed out on 02/10/2019
1805554-201903-M2	2.1.3	Major (upgraded minor NC)	03/08/2019	Closed out on 02/10/2019
1805554-201903-M3	SCCS D 4.2	Major	03/08/2019	Closed out on 02/10/2019
1805554-201903-N1	4.7.3	Minor	03/08/2019	"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 Bukit Benut Palm Oil Mill Certification Unit's (SOU 22) environmental and social performance, legal and any known dispute issues.

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


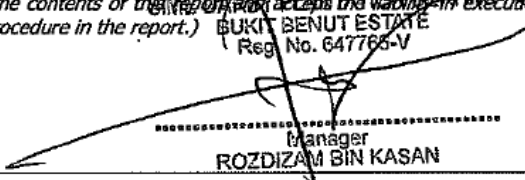
List of Stakeholders Contacted	
Internal Stakeholders Field workers Mill workers NUPW representative Gender committee General workers	Union/Contractors/Local Communities Local village Contractor/vendor
Government Departments Local Community's Representative (Kg. Mengkibol) School's Representative (SJKT Ladang Elaeis)	NGO Nil

IS #	Description
1	Feedbacks: Contractors – They have signed an agreement prior to work. The terms and conditions were clearly stated in the agreement. Payment was made according to the agreed term in the agreement. They are aware of the complaint procedure. They informed that they have good relationship with the management.
	Management Responses: The management will continue to ensure the payment will make promptly and maintain good relationship with the contractors.
	Audit Team Findings: Verified the payment records found that payment was made according to the signed agreement.
2	Feedbacks: Gender Committee Representatives – They informed that there was no case of sexual harassment and violence case reported. They aware of the complaint procedure if there is any case of sexual harassment and violence happened. Reproductive rights of women are respected by the company.
	Management Responses: The management will always respect the rights of women and continue to monitor if there is any case of sexual harassment and violence reported.
	Audit Team Findings: No other issue.
3	Feedbacks: Workers' Representatives (NUPW, Indonesian, Indian, Bangladeshi, Malaysian and Nepalese) – They informed that they are treated equally without discrimination. Wages are in accordance to Minimum Wage

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	<p>Order 2018. Overtime and work on rest day was paid accordance to Employment Act 1955. They are allow to move freely on their free time. They are aware of complaint procedure. They are happy to work in the company.</p> <p>Management Responses: The management will ensure all the workers are treated equally without discrimination of nationalities, race, caste and gender.</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Feedbacks: Local Community’s Representative (Kg. Mengkibol) – The representative informed that they have requested to shift the TNB streetlight pole to a new location near to the village but no response from the management yet. Besides, the representative hopes that have closer relationship with the management.</p> <p>Management Responses: The management has passed the request to Land Department in HQ and waiting for their response.</p> <p>Audit Team Findings: Verified the email communication and details in Indicator 6.1.3. This will be verify during next assessment.</p>
5	<p>Feedbacks: School’s Representative (SJKT Ladang Elaeis) – The teacher informed that they have good relationship with the management.</p> <ul style="list-style-type: none"> i. She has informed that the access gate was promised to be opened from 6.30 am to 6.30 pm. However, recently the gate was closed at 3.30 pm which caused inconvenient for the teachers to leave. ii. Besides, she told that the water supply was closed during school holiday. She also hopes that the company could provide a routine grass cutting at the school instead of written request. <p>Management Responses: The management will maintain good relationship with the school’s management.</p> <ul style="list-style-type: none"> i. As informed by the management that the management has agreed to open the gate until 3.30 pm. Besides, the management has decided to close off the access road due to the security issue. ii. The water is supply by SAJ and it is 24 hours supply. The management will provide grass cutting whenever necessary. <p>Audit Team Findings: No further issue.</p>

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Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Bukit Benut Palm Oil Mill has complied with the RSPO P&C MY-NI 2014 & RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Bukit Benut Palm Oil Mill is approved and continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: ROZDIZAM BIN KASAN
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: SIME DARBY PLANTATION BERHAD
Title: Lead Auditor	Title: ESTATE MANAGER
Signature: 	Signature: <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of the report and accept the liability in execution of the procedure in the report.)</i></p>  <p>SIME DARBY PLANTATION BERHAD BUKIT BENUT ESTATE Reg. No. 647766-V Manager ROZDIZAM BIN KASAN</p>
Date: 12th November 2019	Date: 09.12.2019

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance
Principle 1: Commitment to Transparency		
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p>There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.</p> <p>- Minor compliance -</p> <p><u>Bukit Benut Estate:</u> Evidence that growers provide adequate information on issues relevant to RSPO to relevant stakeholders available via records of consultation such as evidence of stakeholder consultation meeting latest conducted on 4/4/2019 as per minutes of meeting (<i>Minit Mesyuarat "Stakeholder"; No. Mesyuarat 01/2019; Tarikh 4/4/2019</i>). Information related to RSPO including policies were adequately provided and displayed publicly at estate office. An Inter-Office Mail; Ref. # PSQM/ESH/119/07/2018; Dated 2/8/2018 notified that SDPB Sustainability & Quality Management (SQM) Policies recognized that current SQM policies (i.e. 16 policies) as valid until further notice. All existing Sustainability and Quality Management policies are currently accessible via the corporate website http://www.simedarbyplantation.com. Latest briefing by Bukit Benut Estate management to all workers was conducted during muster ground on 8/1/2019 explaining on HCV, COBC, RSPO, MSPO and Policies.</p> <p><u>CEP Niyor Estate:</u> Evidence that growers provide adequate information on issues relevant to RSPO to relevant stakeholders available via records of consultation such as evidence of stakeholder consultation meeting latest conducted on 25/6/2019 as per minutes of meeting (<i>Minit Mesyuarat "Stakeholder"; Tarikh 25/6/2019</i>). Information related to RSPO including policies were adequately provided and displayed publicly at estate office.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>1.1.2 Records of requests for information and responses shall be maintained. -Major compliance</p>	<p><u>Bukit Benut Estate:</u> Records of requests for information and responses maintained in various documents including request book, minutes of meetings and etc. Sighted request made by external stakeholder (Sekolah Agama Ladang Bukit Benut) made during stakeholder meeting on 4/4/2019 to seek estate management’s help to clean bat bites in school building roof. Response was made by estate management with action taken through estate AM & MA to visit the school to inspect the situation and to arrange the cleaning during school break holiday in August 2019.</p> <p><u>CEP Niyor Estate:</u> Records of requests for information and responses maintained in various documents including request book, minutes of meetings and etc. Sighted request made by internal stakeholder (foreign workers) on housing electrical lightings repair on 21/6/2019. Actions to replace the lighting on the same day and verified by complainant as resolved as per records.</p>	<p>Complied</p>
<p>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.</p>		

Criterion / Indicator	Assessment Findings	Compliance
1.2.1	<p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p> <p><u>Bukit Benut Estate:</u> Publicly available documents available such as sustainable policies, records of Social Impact Assessment (SIA) Report, Management Plan on Social Impact Assessment, Complaint Book, External Complaint (form) – AP Post, S01 School Correspondence file and etc. Sighted a sample of latest official correspondence records with school (SK Ladang Bukit Benut) dated 12/1/2019 requested estate management to assist on football field grass cutting for preparation of school sports event.</p> <p><u>CEP Niyor Estate:</u> Publicly available documents available such as sustainable policies, records of Social Impact Assessment (SIA) Report, Management Plan on Social Impact Assessment, Complaint Book, External Complaint (form) Social file and etc. Sighted a sample of latest official correspondence records with school (SK Kampung Melayu Niyor) dated 24/2/2019 requested estate management to assist on installing and dismantling of tents used for school sports event.</p>	<p>Complied</p>
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>An Inter-Office Mail; Ref. # PSQM/ESH/119/07/2018; Dated 2/8/2018 notified that SDPB Sustainability & Quality Management (SQM) Policies recognized that current SQM policies (i.e. 16 policies) as valid until further notice. All existing Sustainability and Quality Management policies are currently accessible via the corporate website http://www.simedarbyplantation.com.</p> <p>The contract documents template were included with the provision for contractors to comply with all Sime Darby Plantation requirements including Code of Business Conduct (COBC) particularly under items 7 and 8 of the COBC which is made available online at www.simedarby.com for the Vendor and its Representatives review.</p> <p><u>Bukit Benut Estate:</u> Latest briefing by estate management to all workers was conducted during muster ground on 8/1/2019 explaining on HCV, COBC, RSPO, MSPO and Policies.</p> <p><u>CEP Niyor Estate:</u> Latest briefing by estate management to all workers was conducted during Town Hall: iCARE Safety & Health Townhall 7.0 on 5/4/2019 explaining on all matters relevant to Safety, Environmental, HCV, COBC, RSPO, MSPO and Policies.</p>	<p>Complied</p>
<p>Principle 2: Compliance with applicable laws and regulations</p>		
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>		

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>SOU22 continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and SQM team. SOU22 has obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:</p> <p><u>Bukit Benut Palm Oil Mill</u></p> <ul style="list-style-type: none"> i. DOE licence no. 004747, reference number, AS(B) J31/152/000/040 Jld.8(02); licensing period: 1/7/19 – 30/6/120. Method of discharge: land application (BOD₃ limit @ 30°C is 100 mg/l with processing capacity of 25 mt/hr. ii. MPOB license: 528154004000 (validity period 1/4/2019 – 31/03/2030) for processing capacity of 120,000MT. iii. Energy commission license, serial no: 004559/2019 (validity period 30/05/2019 – 29/05/2020) for 1,000 kW installation capacity. iv. There are 11 CFs belonged to the mill covering various equipment such as sterilizers, hoist and crane and boilers. Sample of CF checked: <ul style="list-style-type: none"> - Boiler (JH PMD 940, valid until 6/8/19) - Sterilizer (JH PMT 1960, valid until 6/8/19) - Sterilizer (JH PMT 1959 valid until 6/8/19) - Steam receiver (PMT 43561 valid until 6/8/19) - Air compressor (JH PMT2917 valid until 6/8/19) v. Competent Person <table border="1" data-bbox="1025 1107 1870 1367"> <thead> <tr> <th>Competence license</th> <th>Registration no.</th> <th>Issuance date</th> </tr> </thead> <tbody> <tr> <td>Engine Driver Grade 1</td> <td>JH/19/EIS/01/00105</td> <td>28/2/19</td> </tr> <tr> <td>Engine Driver Grade 1</td> <td>J 176/05</td> <td>17/10/05</td> </tr> <tr> <td>CePPOMETS</td> <td>Date of training: 1-5/7/19 (EIMAS training centre)</td> <td>Pending for field training report submission</td> </tr> </tbody> </table>	Competence license	Registration no.	Issuance date	Engine Driver Grade 1	JH/19/EIS/01/00105	28/2/19	Engine Driver Grade 1	J 176/05	17/10/05	CePPOMETS	Date of training: 1-5/7/19 (EIMAS training centre)	Pending for field training report submission	<p>Complied</p>
Competence license	Registration no.	Issuance date													
Engine Driver Grade 1	JH/19/EIS/01/00105	28/2/19													
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CePPOMETS	Date of training: 1-5/7/19 (EIMAS training centre)	Pending for field training report submission													

		<table border="1"> <tr> <td>Internal combustion engine (ICE)</td> <td>S/37/85</td> <td>30/12/1985</td> </tr> <tr> <td>Authorized Entrant and Standby Person (AESP)</td> <td>NW-NJHR-AE-R-2889-R</td> <td>Validity period (24/4/19 -/23/4/21)</td> </tr> <tr> <td>Electrical charge man, A4</td> <td>PJ-T-4-H006-2006</td> <td></td> </tr> </table>	Internal combustion engine (ICE)	S/37/85	30/12/1985	Authorized Entrant and Standby Person (AESP)	NW-NJHR-AE-R-2889-R	Validity period (24/4/19 -/23/4/21)	Electrical charge man, A4	PJ-T-4-H006-2006		
Internal combustion engine (ICE)	S/37/85	30/12/1985										
Authorized Entrant and Standby Person (AESP)	NW-NJHR-AE-R-2889-R	Validity period (24/4/19 -/23/4/21)										
Electrical charge man, A4	PJ-T-4-H006-2006											
		<p>vi. Water Abstraction License (BAKAJ), license no. 08/A/Klg/014, file no.: BAKAJ/334/300/05/07/08/15 valid until 31/12/19. Maximum water abstraction: 700 m3/day</p> <p><u>Lambak Estate</u></p> <ul style="list-style-type: none"> i. MPOB license, 518641002000 for selling and transporting of FFB, valid 1/3/19 until 29/2/19. ii. Diesel permit and petrol permit, serial no. J038042, reference no.: BPGK JH (KLU)0031 SK, diesel: 15,000 litre petrol: 40 litre valid 30/6/19 – 29/6/20 iii. Air compressor, JH PMT 13852 valid until 19/9/19 (main division) iv. Air compressor, JH PMT 11573 valid until 19/9/19 (Elaeis division) <p><u>Bukit Benut Estate</u></p> <ul style="list-style-type: none"> i. MPOB License. License no. 522307002000. Validity period from 1/8/2019 -31/7/2020. ii. Air compressor permit. Ref. no PMT-JH/19 78363. Validity period until 19/8/2020 										

		<ul style="list-style-type: none"> iii. Purchasing of diesel and Petrol. Ref. no. BPGK JH (KLU)0624 SK for 9000 litre diesel and 1000 litre petrol. Validity period from 22/7/2019 -21/7/2020. iv. Workers Salary Deduction Permit (Section 24 Employment Act 1955) – Electricity Bills (amount <RM70/month); Serial # PP3/29/377/2006; Effective from: 1/10/2006 v. Workers Salary Deduction Permit (Section 24 Employment Act 1955) –Bukit Benut Estate Maintenance Fund; Serial # PP3/29/0191; Effective from: 1/3/1999 vi. Blanket Approvals for Exemption Under Section 24 Employment At 1955 – Deduction from Wages; MAPA Circular # 24/2018; Date: 16/7/2018: ASN, YPEIM, Zakat, ASB, Bank Rakyat, Tabung Haji, MAKNA, Foreign worker accommodation (<RM50/month) <p><u>CEP Niyor Estate</u></p> <ul style="list-style-type: none"> i. MPOB License. License no. 508445102000. Validity period from 1/4/2019 -31/3/2020. ii. Air compressor permit. Ref. no PMT-JH/18 61044. Validity period until 7/2/2020 iii. Purchasing of diesel and Petrol. Ref. no. BPGK JH (KLU)0614 SK for 15000 litre diesel and 450 litre petrol. Validity period from 13/8/2018 -12/8/2019. New application to renew the permit has been submitted to KPDNHEP through BLESS system on 20/7/2019. Refer submission no. BL22019028580. iv. Permit to purchase and storage for Acephate. Permit no. JHR/2019/ACP/45(GL) for purchasing of 450 kg Acephate. v. Workers Salary Deduction Permit (Section 24 Employment Act 1955) – Electricity Bills (amount <RM50/month); Serial # PP3/29/095/2004; Effective from: 1/8/2004 	
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> vi. Workers Salary Deduction Permit (Section 24 Employment Act 1955) – Water Bills to SAJ; Serial # PP3/29/0144; Effective from: 1/12/1998 vii. Blanket Approvals for Exemption Under Section 24 Employment At 1955 – Deduction from Wages; MAPA Circular # 24/2018; Date: 16/7/2018: ASN, YPEIM, Zakat, ASB, Bank Rakyat, Tabung Haji, MAKNA, Foreign worker accommodation (<RM50/month) 	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	<p>Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>All legal requirement was documented in Legal and Requirement Register. Compliance to each applicable law and regulation is monitored by the operating units. The legal register at all sites were reviewed/updated on a yearly basis / as and when needed for new updates/licenses.</p> <p><u>Bukit Benut Estate & CEP Niyor Estate</u> All legal requirement was documented in Legal and Requirement Register. All the legal and other requirements were register accordingly and documented in the legal requirement register Latest update was done in July 2019 to include new update for Noise Regulation 2019.</p>	Complied

<p>2.1.3</p>	<p>A mechanism for ensuring compliance shall be implemented. - Minor compliance -</p>	<p>As per the approval from JTK for the maximum overtime of 130 hours per month, the workers are not allowed to work more than 4 hours of overtime if work on rest day, public holiday and replacement of public holiday under Section (ii). However, document reviewed on the Daily Input Form in Bukit Benut POM found that the following workers worked more than 4 hours during work on rest day and public holiday.</p> <table border="1" data-bbox="981 571 1868 1145"> <thead> <tr> <th>Employee No.</th> <th>Date</th> <th>Hours of Overtime</th> </tr> </thead> <tbody> <tr> <td>17465</td> <td>21/1/2019</td> <td>16</td> </tr> <tr> <td>17490</td> <td>2/6/2019</td> <td>10</td> </tr> <tr> <td>17498</td> <td>2/6/2019</td> <td>10</td> </tr> <tr> <td>17491</td> <td>2/6/2019</td> <td>8</td> </tr> <tr> <td>17503</td> <td>2/6/2019</td> <td>8</td> </tr> <tr> <td>124553</td> <td>2/6/2019</td> <td>10</td> </tr> <tr> <td>129037</td> <td>2/6/2019</td> <td>10</td> </tr> <tr> <td>136775</td> <td>2/6/2019</td> <td>10</td> </tr> <tr> <td>127198</td> <td>16/6/2019</td> <td>8</td> </tr> <tr> <td>29483</td> <td>16/6/2019</td> <td>8</td> </tr> </tbody> </table> <p>Besides, one worker (Employee No.: 17470) found that continuously worked 48 hours from 14/1/2019 to 15/1/2019 as verified the punch card and Daily Input Form/ Overtime Request Form. He worked 8 hours normal working hour and 16 hours of overtime for two days consecutively. Interviewed with the worker told that he has rested 3.5 – 4 hours in the canteen. No evidence to show that the worker has enough rest to</p>	Employee No.	Date	Hours of Overtime	17465	21/1/2019	16	17490	2/6/2019	10	17498	2/6/2019	10	17491	2/6/2019	8	17503	2/6/2019	8	124553	2/6/2019	10	129037	2/6/2019	10	136775	2/6/2019	10	127198	16/6/2019	8	29483	16/6/2019	8	<p>Upgraded to Major nonconformance</p>
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127198	16/6/2019	8																																		
29483	16/6/2019	8																																		

Criterion / Indicator		Assessment Findings	Compliance
		<p>continue to continue to work for the next day.</p> <p>Due to the recurring minor non-compliances on the same indicator occurred in successive surveillance audit, thus the minor upgraded to major as per RSPO P&C certification system requirements June 2017.</p>	
2.1.4	<p>A system for tracking any changes in the law shall be implemented.</p> <p>- Minor compliance -</p>	<p>A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU1. PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. Refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law been well implemented. E.g. regular notification by Head Office and regular updates from the DOE/DOSH websites as well as from MAPA circulars.</p>	Complied
<p>Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>			

<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>SOU22 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates has a list of all its land titles which have the information about names of leasee, hectare, terms & conditions, lease period and grant numbers. Copies of the land titles were available at the estate’s offices while the original were kept at headquarter.</p> <p>Example of land titles checked:</p> <table border="1" data-bbox="981 619 1868 1289"> <thead> <tr> <th>Estate</th> <th>Land title</th> <th>Land use type</th> <th>Tenure</th> </tr> </thead> <tbody> <tr> <td>Lambak Estate</td> <td> <p>Sample :</p> <p>Grant no. 134839, lot no. 2983, Mukim Kluang, District: Kluang title area: 505.8563 ha</p> <p>Grant no. 134839, lot no. 526 Mukim Kluang, District: Kluang title area: 397.725 ha</p> <p>Total titles (20): 3,758.792 ha</p> </td> <td>Agriculture & not categorized/gazetted</td> <td>Freehold</td> </tr> </tbody> </table> <p><u>Bukit Benut Estate</u></p>	Estate	Land title	Land use type	Tenure	Lambak Estate	<p>Sample :</p> <p>Grant no. 134839, lot no. 2983, Mukim Kluang, District: Kluang title area: 505.8563 ha</p> <p>Grant no. 134839, lot no. 526 Mukim Kluang, District: Kluang title area: 397.725 ha</p> <p>Total titles (20): 3,758.792 ha</p>	Agriculture & not categorized/gazetted	Freehold	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance																														
	<p>The estate hold 30 land 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="981 491 1700 730"> <thead> <tr> <th>Grant No.</th> <th>Lot no</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>GRN 120735</td> <td>1088</td> <td>351.87</td> </tr> <tr> <td>GRN 120739</td> <td>1483</td> <td>343.58</td> </tr> <tr> <td>GRN 90182</td> <td>1708</td> <td>611.14</td> </tr> <tr> <td>GRN 98998</td> <td>873</td> <td>195.97</td> </tr> </tbody> </table> <p><u>CEP Niyor Estate</u> The estate holds 21 grant tittle. 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="981 927 1700 1166"> <thead> <tr> <th>Grant No.</th> <th>Lot no</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>GN 530151</td> <td>2218(8199)</td> <td>793.5873</td> </tr> <tr> <td>HSD 68985</td> <td>PTD 6368</td> <td>341.7793</td> </tr> <tr> <td>GRN 86982</td> <td>2373</td> <td>415.4105</td> </tr> <tr> <td>GM 660</td> <td>633</td> <td>2.8682</td> </tr> </tbody> </table>	Grant No.	Lot no	Hectare	GRN 120735	1088	351.87	GRN 120739	1483	343.58	GRN 90182	1708	611.14	GRN 98998	873	195.97	Grant No.	Lot no	Hectare	GN 530151	2218(8199)	793.5873	HSD 68985	PTD 6368	341.7793	GRN 86982	2373	415.4105	GM 660	633	2.8682	
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Criterion / Indicator		Assessment Findings	Compliance
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	<p><u>Bukit Benut Estate</u> The estate has clearly demarcated its legal boundary with red and white concrete pole and security trenches as sighted in field P16B and P08B, adjacent with smallholders.</p> <p><u>CEP Niyor Estate</u> Sighted during site visit at P08/1 adjacent with smallholders, the legal boundary stone were clearly demarcated with red and white colour GI pipe. Additionally, the estate has constructed security trenches along estate legal boundary.</p>	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute within the Bukit Benut Estate and CEP Niyor Estate at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute within the Bukit Benut Estate and CEP Niyor Estate at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute within the Bukit Benut Estate and CEP Niyor Estate at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied

Criterion / Indicator		Assessment Findings	Compliance
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute within the Bukit Benut Estate and CEP Niyor Estate at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	There is no land dispute within the Bukit Benut Estate and CEP Niyor Estate at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied

Criterion / Indicator	Assessment Findings	Compliance
2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	There is no land dispute within the Bukit Benut Estate and CEP Niyor Estate at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There is no land dispute within the Bukit Benut Estate and CEP Niyor Estate at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no land dispute within the Bukit Benut Estate and CEP Niyor Estate at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
Principle 3: Commitment to long-term economic and financial viability		

Criterion / Indicator		Assessment Findings	Compliance																		
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.																					
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	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.	Complied																		
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	<p>SOU 22 estates have long range replanting program. 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>BBE</th> <th>CEP</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>-</td> <td>38.01</td> </tr> <tr> <td>2021</td> <td>88.5</td> <td>57.10</td> </tr> <tr> <td>2022</td> <td>102.63</td> <td>62.39</td> </tr> <tr> <td>2023</td> <td>144.19</td> <td>72.84</td> </tr> <tr> <td>2024</td> <td>107.16</td> <td></td> </tr> </tbody> </table> <p><u>Lambak Estate</u> 2019: 140.39 ha (1994B, 1996B) 2020: 147.31 ha (1996A, 1996C) 2021: 124.02 ha (1995C1, 2000A) 2022: 81.87 ha (2001A) 2023: 131.3 ha (2001A1, 2001B)</p>		BBE	CEP	2020	-	38.01	2021	88.5	57.10	2022	102.63	62.39	2023	144.19	72.84	2024	107.16		Complied
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Principle 4: Use of appropriate best practices by growers and millers																					
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.																					

Criterion / Indicator		Assessment Findings	Compliance
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	<p>SOP available for the Palm Oil Mill and the Estates. 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.</p> <p>Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc. Noted updated procedure under SOP for water analysis and RSPO SCCS procedure:</p> <p>i)SPMS, Appendix 7: SOP for water quality monitoring, issue:2 dated 1/6/16. 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
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

<p>4.1.3</p>	<p>Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -</p>	<p><u>Bukit Benut Estate</u> Latest Plantation Advisor visit was conducted on 30 – 31/7/2018 and 7/8/2018. Refer report STR/SOU22/BBE/18 - 19. The report covers yield improvement, agro management practices and others. All issue raised during the visit has been addressed by the estate.</p> <p>Structured Crop Recovery Assessment (SCRA) latest visit on the estate was on 99/3/2019. 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 5.00.</p> <p><u>CEP Niyor Estate</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 15/1/2019. The report covering on replant, nursery, mature upkeep, manuring, Building and Facilities Management, EVIT and Ex-Estate Cost. All issue raised during the visit has been addressed by the estate with overall rating 5.00.</p> <p><u>Bukit Benut Palm Oil Mill</u> Mill advisor visit was conducted twice a year. Latest visit was conducted on 16-17/5/2019 and 19-20/12/2018. Refer report no. SOU 22/BBM/01/2019 with score ratings at 88.20 and 82.64 respectively. All areas of concern raised has been addressed by mill according to the given timeline.</p> <p>SORA (Structured Oil Recovery Assessment) visit on 6 monthly basis focusing on product quality and mill operation inspection. Latest visit was conducted in 18-21/3/2019. A few areas of concern highlighted for improvement.</p> <p><u>Lambak Estate</u></p>	<p>Complied</p>
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RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator		Assessment Findings	Compliance
		Latest Agronomist report dated 8/9/19 for Lambak Estate (Agronomic & Fertilizer Recommendation Report – Oil Palm) FY 2019/2020 is available for review. The report has summarized yield gap, palm nutritional status and fertilizer recommendation for the 2019/2020 programme.	
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	No third party FFB received. All the FFB are from own certificate scope and adjacent Sime Darby certified estates	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	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

Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.2</p> <p>Records of fertiliser inputs shall be maintained. - Minor compliance -</p>	<p><u>Bukit Benut Estate</u> The estate maintain the records of manuring application as per recommendation by the agronomist. Observed application records as per agronomist recommendation: Month program: July 2019 Field: P97B and P97C Ha program: 144.69 ha Type: Ammonium Chloride Rate/palm: 2.70 kg/palm Month applied: 9 – 22/7/2019 Ha applied: 144.69 ha</p> <p><u>CEP Niyor Estate</u> The estate maintain the records of manuring application as per recommendation by the agronomist. Observed application records as per agronomist recommendation: Month program: July - August 2019 Field: 2000A, 2000B, 2000C and 2000D Ha program: 115.37 ha Type: MOP Rate/palm: 2.00 kg/palm, 1.90 kg/palm, 2.30 kg/palm and 1.90 kg/palm Month applied: 20 – 22/7/2019 Ha applied: 115.37 ha</p> <p><u>Lambak Estate</u> Fertilizer application programme is based on the recommendation by agronomist under Appendix I, Agronomist and Fertilizer Recommendations Report. Date of visit: 21/3/19 & 4/4/19. Programme for mature and immature fields available for review. Sample of programme for AC (25% N) for July 2019. 2002A: 47.72 ha (total applied – 14.619 mt)</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<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>Bukit Benut Estate</u> Last soil sampling analysis was carried out on 16/12/2014. Refer report no. S20/2015 dated 16/3/2015. Last leaf sampling analysis was carried out on December 2018. Foliar nutrient status enclosed in 2019 Agronomic and Fertiliser Recommendations Reports dated 30/4/2019.</p> <p><u>CEP Niyor Estate</u> Latest soil sampling analysis was conducted in November 2018 including Talisman Division. 12 soil sampled was sent to Sime Darby Research laboratory for analysis. Refer test result no. S2/2019 dated 2/1/2019. Last leaf sampling analysis was carried out on October 2018. Foliar nutrient status enclosed in 2019 Agronomic and Fertiliser Recommendations Reports dated 3/4/2019.</p> <p>Sime Darby Seeds and Agriculture Services Sdn Bhd prepare the annual fertilizer recommendation. Leaf analysis result which shows the nutrient level was used as guidance for the fertilizer recommendation. At Lambak Estate, leaf sampling was carried out in January 2019 during agronomist visit. Foliar nutrient status reported under the latest agronomist report for FY2019/2020 dated 8th May 2019. Soil analysis carried out at 5 years interval. The last soil analysis was carried out on 3/3/15, Report# 37/2015 dated 24/4/15.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.4</p> <p>A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.</p> <p>- Minor compliance -</p>	<p>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:</p> <ul style="list-style-type: none"> i. EFB applied at selected fields at the estates. ii. Palm residues after planting were left in the biomass row to decompose. <p><u>CEP Niyor Estate</u> Sighted the EFB application program and application FY 2018 recorded at 1778.25 mt.</p> <p>Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. EFB applied at selected fields at the estates. Recommended rate is 40mt/ha for mature field and 35mt/ha for immature field.</p> <p><u>Lambak Estate</u> Specific immature field application at field 19A. Total of 1,833.93 mt of EFB applied with total of 64 ha area covered at 28.65 mt/ha</p>	<p>Complied</p>
<p>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>4.3.1</p> <p>Maps of any fragile soils shall be available. - Major compliance -</p>	<p><u>Bukit Benut Estate</u> No fragile soil categorized in the estate as per soil series map issued bt the R&D Precision Agriculture Unit dated 30/1/2014. Most soil series in the estate are as follows: Rengam (61.86%), Rengam/Bukit Lunchu (27.62%), Jerangau (8.23%) and Bukit Lunchu (2.29%).</p> <p><u>CEP Niyor Estate</u> There were 10.00 ha of peat soils identified in the estate as per Soil Series Map issued by the R&D-TTAS – Precision Agriculture Unit dated 19/4/2019. No other soil categorised as problematic or fragile soil. Most soil series in the estate are as follows: Batu lapan, Bukit Temiang, Bungor, Durian, Gajah Mati, Gong Chenak, Harimau, Holyrood, Jerneh, Jitra, Kawang, Local Alluvium, Masai, Nami, Ocm, Peat, Rengam, Serdang, Tampoi, Tavy, Tebok, Terap, Ulu Tiram.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance																												
<p>4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -</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> <ul style="list-style-type: none"> i. Slope of >25° must be excluded from any new planting development and replanting program. ii. Slope of <25°, the existing crop and vegetation shall be maintained accordingly. <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>Topography map was made available at the estate for review. The topography at the estate visited as follows:</p> <table border="1" data-bbox="976 751 1861 986"> <thead> <tr> <th></th> <th>BBE (%)</th> <th>CNE (%)</th> <th>LE (%)</th> </tr> </thead> <tbody> <tr> <td>0° - 2°</td> <td>8.90</td> <td>31.61</td> <td>14.92</td> </tr> <tr> <td>2° - 6°</td> <td>43.18</td> <td>62.82</td> <td>50.99</td> </tr> <tr> <td>6° - 12°</td> <td>35.90</td> <td>5.47</td> <td>25.49</td> </tr> <tr> <td>12° - 20°</td> <td>10.85</td> <td>0.09</td> <td>5.80</td> </tr> <tr> <td>20° - 25°</td> <td>1.00</td> <td>0.01</td> <td>1.46</td> </tr> <tr> <td>>25°</td> <td>0.17</td> <td>-</td> <td>0.60</td> </tr> </tbody> </table>		BBE (%)	CNE (%)	LE (%)	0° - 2°	8.90	31.61	14.92	2° - 6°	43.18	62.82	50.99	6° - 12°	35.90	5.47	25.49	12° - 20°	10.85	0.09	5.80	20° - 25°	1.00	0.01	1.46	>25°	0.17	-	0.60	<p>Complied</p>
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<p>4.3.3 A road maintenance programme shall be in place. - Minor compliance -</p>	<p><u>Bukit Benut Estate & CEP Niyor Estate</u></p> <p>The estates visited has established road maintenance program. The program focusing on road grading. Sighted the road grading records for both estates visited for the month of May and June 2019. Noted during site visit at both estate, the road in satisfactory conditions. Sighted the road side drain was established to divert water from the road into the field.</p>	<p>Complied</p>																												

Criterion / Indicator	Assessment Findings	Compliance
<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><u>Bukit Benut Estate</u> No fragile soil categorized in the estate as per soil series map</p> <p><u>CEP Niyor Estate</u> There were 10.00 ha of peat soils identified in the estate as per Soil Series Map issued by the R&D-TTAS – Precision Agriculture Unit dated 19/4/2019. Sime Darby has established General Guidelines for Peat Subsidence Monitoring. Refer document ref. no. STR-PNP-Agronomy-01/2017-18. The estate has established Peat Soil Management Plan. The management plan focusing on peat subsidence reading. Sighted the implementation of the management plan as follows: i. The estate has established Peat Subsidence Station at P13A. Peat Subsidence reading was conducted on quarterly basis. Sighted the records of Peat Subsidence reading for the month of April and July 2019.</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>Bukit Benut Estate</u> No fragile soil categorized in the estate as per soil series map</p> <p><u>CEP Niyor Estate</u> No replanting area for the next 5 years at the peat area. The drainability assessment will be conducted prior to replanting before the land preparation process.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
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. <u>Bukit Benut Estate</u> No fragile soil categorized in the estate as per soil series map <u>CEP Niyor Estate</u> There were 10.00 ha of peat soils identified in the estate as per Soil Series Map issued by the R&D-TTAS – Precision Agriculture Unit dated 19/4/2019. No other soil categorised as problematic or fragile soil.	Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.		

<p>4.4.1</p>	<p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p><u>Bukit Benut Estate</u> The estate has established Water Management Plan – Bukit Benut Estate FY 2019. The management plan stated the water source, areas of concern, Monitoring, contingency plan, person responsible and time frame. The areas of concern focusing on water shortage/dry spell, severe water pollution, contamination of surface and ground water and rainwater harvesting. Sighted the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> i. River water analysis was conducted on quarterly basis. Sighted the water sampling results for 1st and 2nd quarter of 2019. ii. Sighted the waste water from the chemical premix area was collected and reused during chemical mixing area. iii. Sighted the container for rainwater harvesting at workshop area. <p><u>CEP Niyor Estate</u> The estate has established the water management plan and documented in Environmental Management Plan FY 2019 under Water Management. The management plan focusing on contingency during water shortage, monitor usage of treated water and reuse/recycle waste water. Sighted the implement as follows:</p> <ul style="list-style-type: none"> i. the estate monitor the usage of water on monthly basis and recorded in CEP Niyor Estate Energy Consumption FY 2018/19. The sampled consumption records as follows: <table border="1" data-bbox="981 1106 1348 1359"> <thead> <tr> <th>Month</th> <th>Liter</th> </tr> </thead> <tbody> <tr> <td>Jan 19</td> <td>6408</td> </tr> <tr> <td>Feb 19</td> <td>5742</td> </tr> <tr> <td>Mar 19</td> <td>6404</td> </tr> <tr> <td>Apr 19</td> <td>5996</td> </tr> <tr> <td>May 19</td> <td>5251</td> </tr> </tbody> </table>	Month	Liter	Jan 19	6408	Feb 19	5742	Mar 19	6404	Apr 19	5996	May 19	5251	<p>Complied</p>
Month	Liter														
Jan 19	6408														
Feb 19	5742														
Mar 19	6404														
Apr 19	5996														
May 19	5251														

Criterion / Indicator	Assessment Findings		Compliance
	Jun 19	3907	
	ii. Sighted the waste water from the chemical premix area was collected and reused during chemical mixing area. iii. Sighted the container for rainwater harvesting at workshop area.		

<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>Documented in Sime Darby Slope and River Protection Policy dated 15/1/2015 signed by the Managing Director stated that buffer zone shall be maintained on both side of the river banks.</p> <table border="1" data-bbox="981 459 1744 722"> <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> <tr> <td>*> 3 meters</td> <td>20 meters</td> </tr> </tbody> </table> <p>* For Sabah Plantations only 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 01/11/2008.</p> <p><u>Bukit Benut Estate</u> The estate have established riparian buffer zone for Sungai Melantai at P10 C-5. During site visit at the riparian buffer zone, at water sampling point no 3 , there is evidence of chemical application along the riparian buffer zone established. Thus, a major NC was issued.</p> <p>The estate established 3 water sampling point for upstream, middle and downstream. The water sampling was conducted on quarterly basis and the sampled was sent to appointed lab to be analysis. Sighted the sampled water analysis result as follows: i. Sampling date: 2/7/2019 Report no.: IE722/2019 dated 17/7/2019 Result: Not conform to class IIA and IIB NWQS for natural waterways. BOD, COD and DO for 3 sample taken were exceed perimeter.</p> <p>ii. Sampling date: 18/3/2019</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	*> 3 meters	20 meters	<p>Major nonconformance</p>
River width	Buffer zone																
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*> 3 meters	20 meters																

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Report no.: IE358/2019 dated 4/4/2019 Result: Not conform to class IIA and IIB NWQS for natural waterways. DO for 3 sample taken were exceed perimeter.</p> <p>Investigation has been conducted for both sampled. Noted the investigation report recorded in form WQ-01/CPAR(1) for sampled IE722/2019 dated 17/7/2019 conducted on 1/8/2019. Resampling has been conducted and submitted to lab for analysis.</p> <p><u>CEP Niyor Estate</u> There is no river flow through the estate. The buffer zone established at the water reservoir for nursery. Sighted during site visit at buffer zone area at water reservoir area for nursery, the buffer zone was demarcated with red color stick and fenced. There are no spraying activity along the buffer zone and the vegetation along are well preserved. The estate has placed signage of prohibition to conduct activity at buffer zone area.</p>	

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Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.3</p> <p>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 -</p>	<p>Effluent Analysis conducted by Sime Darby Research and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill’s compliance schedule for quarterly submission. Total of 11 parameters (pH, TA, VFA, BOD, COD, TS, SS, VSS, TN, AN and O&G) tested. Latest analysis report for June 2019 was checked. Refer to test report# EP274/2019 date issue 1/7/19. BOD for final discharge is 385 mg/l vs limit of 100 mg/l.</p> <p>Quarter return report submitted on quarterly basis to DOE. The 2nd quarter (Q2) of 2019 report available for review. Report dated 12/7/19 is referred to.</p> <p>1st week (9/4/19) : BOD – 2,710 ppm 5th week (9/5/19) : BOD – 1,725 ppm 9th week (11/6/19) : BOD – 385 ppm</p> <p>Application for extension of time for compliance (BOD limit 100 ppm) refer to ref AS (B)J 31/152/000/051 Jilid 7 (03) dated 15/5/19. Approval granted until 30 June 2019, new license period will follow BOD 100 ppm.</p>	<p>Complied</p>
<p>4.4.4</p> <p>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -</p>	<p>Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from water catchment by using pump. An average of 1.51 m³ water is used to process per mt of FFB recorded from July 2018 to December 2018</p>	<p>Complied</p>
<p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.1 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 Cassia Cobanensis, Tunera Subulata, Antigonan Leptopus.</p> <p><u>Bukit Benut Estate</u> The estate has established IPM management plan FY 2019. Sighted the implementation of the management plan as follows: i. Barn owl box ratio at 1:11 ha. Barn owl census was conducted on February 2019. Occupancy rate recorded at average of at 52.20% together with BOB maintenance and replacement/new box. ii. Sighted the Euphorbia Seeds production records for the month of May, June and July 2019.</p> <p><u>CEP Niyor Estate</u> i. Barn owl box ratio at 1:11 ha. Barn owl census was conducted on February 2019. Occupancy rate recorded at average of at 43.90% together with BOB maintenance and replacement/new box. ii. Latest Rat Baiting campaign was conducted on January 2019. The baiting rounds was 3 – 5 rounds with acceptance level at 16 – 19%.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<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 rat baiting applicator and sprayers confirm their understanding of the benefit of planting beneficial plant to fight pest, barn owl and pest and disease spray. Sighted the sampled training records as follows:</p> <p><u>Bukit Benut Estate</u></p> <p>i. Euphorbia Heterophylla establishment training dated 23/1/2019</p> <p><u>CEP Niyor Estate</u></p> <p>i. Integrated Pest Management: Beneficial Plant training dated 16/4/2019</p> <p>ii. Trunk injection training dated 20/7/2019</p> <p>IPM training is given by the Agronomist and plantation executives with qualification in agriculture. Interview with the barn owl occupancy census team confirm their understanding of the Sime Darby SOP in Agricultural Reference Manual v.1 Section 15 on census. The latest IPM training (mobile beneficial plant census) was carried on 31/5/19 at Lambak Estate.</p>	<p>Complied</p>
<p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p>		

Criterion / Indicator	Assessment Findings	Compliance																					
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. Some of recommended pesticides are: Immature planting (sample) - General weeds : Glyphosate - Pennisetum polystachion : Metsulfuron Methyl - Stenochlaena palustris : Sodium chlorate Mature planting - Grass weed and Asystasia : glyphosate & 2,4-D amine - The selection is also evaluated by the agronomist during his visit to the estate.	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 1029 1512 1264"> <thead> <tr> <th>Month</th> <th>BBE</th> <th>CNE</th> </tr> </thead> <tbody> <tr> <td>Jan 19</td> <td>1.15</td> <td>3.52</td> </tr> <tr> <td>Feb 19</td> <td>1.06</td> <td>3.09</td> </tr> <tr> <td>Mar 19</td> <td>2.16</td> <td>2.59</td> </tr> <tr> <td>Apr 19</td> <td>1.16</td> <td>3.28</td> </tr> <tr> <td>May 19</td> <td>3.15</td> <td>3.09</td> </tr> <tr> <td>Jun 19</td> <td>6.10</td> <td>2.14</td> </tr> </tbody> </table>	Month	BBE	CNE	Jan 19	1.15	3.52	Feb 19	1.06	3.09	Mar 19	2.16	2.59	Apr 19	1.16	3.28	May 19	3.15	3.09	Jun 19	6.10	2.14	Complied
Month	BBE	CNE																					
Jan 19	1.15	3.52																					
Feb 19	1.06	3.09																					
Mar 19	2.16	2.59																					
Apr 19	1.16	3.28																					
May 19	3.15	3.09																					
Jun 19	6.10	2.14																					

Criterion / Indicator		Assessment Findings	Compliance
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.	Complied
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	Paraquat was eliminated. 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.	Complied

<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>Bukit Benut Estate</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. Noted during interview with rat baiting applicator, they were provided with appropriate PPE such as mask, safety helmet, and nitrile glove and wellington boots. Sighted the training records for pesticides operator as follows:</p> <ul style="list-style-type: none"> i. Proper Calibration of Control Droplet Applicator during spraying training dated 20/4/2019 ii. Inspection of Estate driver competency training dated 17/4/2019 iii. Proper PPE and circle spraying at Immature field on 9/1/2019 iv. Safety and Proper PPE for CDA spraying training dated 10/12/2018 iv. Safety and proper PPE during Cyphermethrin Spraying training dated 22/11/2018 <p><u>CEP Niyor Estate</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. Noted during interview with CDA sprayers and mandore , they were provided with appropriate PPE such safety helmet ,</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	respirator, safety goggle, apron nitrile glove and wellington boots. Sighted the training records for pesticides operator as follows: i. Chemical handling and application foe sprayers, PPE training dated 15/5/2019 ii. trunk injection training dated 20/7/2019 iii. Chemical handling for staff training dated 27/8/2018 Sighted the PPE issuance records for wellington boots, nitrile gloves, apron and mask 8210 recorded in Record Issue PPE forms.	
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	Complied
4.6.8	Pesticides shall be applied aurally only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	<u>Bukit Benut Estate & CEP Niyor Estate</u> Domestic waste was collected twice a week and disposed at designated landfill located. The location selection as per the SOP established, SD/SDP/PSQM(ESH)/203-EN7 dated 13/3/2017. Recycle bin was provided at the linesite area. Noted during visit at the landfill area, no evidence of recycle waste and scheduled waste sighted in the landfill. Noted during interview with the workers shows the understanding on proper disposal of domestic waste on prohibition of burning of garden waste at linesite area.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p>	<p>Medical surveillance was carried out by OHD, HQ/08/DOC/00/597 under Klinik Renggam on 6-8/8/18 for total of 35 workers from different work units based on CHRA recommendation. Group of sprayers, trunk injector, sprayer, store keeper and foreman was sent for medical surveillance. Results is still pending as the programme was recently started in early July 2018</p> <p>2 workers found to be unfit based on result of Manganese in urine test. Medical removal protection was initiated where the said workers were prohibited. Retest was conducted on 11/3/19 and found no detrimental of health records.</p> <p><u>Bukit Benut Estate</u> Medical surveillance for workers involve in pesticides and chemical handling was conducted on annually basis. Latest medical surveillance was currently in progress and the report will be submitted by the OHD once completed. FY 2018, the medical surveillance was conducted on 4 – 6/7/2018. 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>CEP Niyor Estate</u> Medical surveillance for workers involve in pesticides and chemical handling was conducted on annually basis. Latest medical surveillance was conducted on 6 – 10/12/2018. Total of 20 workers involve in chemical handling were sent for medical surveillance. 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>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	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. <u>CEP Niyor Estate</u> The estate has issued internal memo to all worker on prohibition of work with pesticides for confirm pregnant and breast feeding woman signed by the estate manager dated 2/1/2019.	Complied
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			

<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>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.</p> <p>The GSQM team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p> <p>LEV Testing and Inspection Last inspection was carried out on 14/3/19 by Spectrum Laboratories (Johore) Sdn Bhd. DOSH registered IHT II, JKPP HIE 127/171-3/2(22). Face velocity (hood) and travel velocity (ducting) within and higher than recommended value of ACGIH. Monthly inspection done by internal technician. Refer to inspection checklist for the month of July 2019.</p> <p>Chemical Hazard Risk Assessment (CHRA) Latest CHRA was revisited on 2/2/19 by registered DOSH assessor, JKPP HIE 127/171-2(166). 6 work units were assessed and related recommendation report under from F of the report. Example of recommendation as per below:</p> <table border="1" data-bbox="981 1026 1863 1342"> <thead> <tr> <th>Work unit</th> <th>Recommendation</th> </tr> </thead> <tbody> <tr> <td>Laboratory</td> <td>Chemical safe handling every 2 years Biological monitoring/medical surveillance programme (n-hexane) Chemical exposure monitoring (n-hexane) Emergency eyewash and shower Annual LEV monitoring</td> </tr> <tr> <td>Workshop</td> <td>Chemical safe handling every 2 years Biological monitoring/medical surveillance programme (manganese fumes)</td> </tr> </tbody> </table>	Work unit	Recommendation	Laboratory	Chemical safe handling every 2 years Biological monitoring/medical surveillance programme (n-hexane) Chemical exposure monitoring (n-hexane) Emergency eyewash and shower Annual LEV monitoring	Workshop	Chemical safe handling every 2 years Biological monitoring/medical surveillance programme (manganese fumes)	<p>Complied</p>
Work unit	Recommendation								
Laboratory	Chemical safe handling every 2 years Biological monitoring/medical surveillance programme (n-hexane) Chemical exposure monitoring (n-hexane) Emergency eyewash and shower Annual LEV monitoring								
Workshop	Chemical safe handling every 2 years Biological monitoring/medical surveillance programme (manganese fumes)								

		<p><u>Medical surveillance programme</u></p> <p>Latest medical surveillance programme was last carried out on 11 & 12/6/19 involving 14 workers from workshop and laboratory by registered OHD, HQ/08/DOC/00/597 under Klinik Rengam. Based on biological test done for N-hexane and Manganese exposure, it was found that all workers are fit to work with no detrimental of health.</p> <p><u>Bukit Benut Estate</u></p> <p>The estate has established and implemented OSH plan FY 2019. Sighted the implementation plan as follows:</p> <ul style="list-style-type: none"> i. Latest medical surveillance was conducted on 25/7/2019. Medical screening was conducted on monthly basis. Sighted the medical screening records for the month of April, May and June 2019. ii. Workplace inspection was conducted on quarterly basis prior to OSH committee meeting. Sighted the workplace inspection report no. 01/2019, 02/2019 and 03/2019. The results of the inspection was discussed during OSH committee meeting. <p><u>CEP Niyor Estate</u></p> <p>The estate has established OSH Management Plan FY 2019. The plan stated the activity, objective, person responsible and time frame. The activity to be conducted such as OSH committee meeting, Work safety audit and inspection, health and hygiene audit and inspection, safety and health training, ERP training and accident preventive measure.</p> <p>Sighted the implementation of the plan as follows:</p> <ul style="list-style-type: none"> i. Medical surveillance for workers involve in pesticides and chemical handling was conducted on annually basis. Latest medical surveillance was conducted on 6 – 10/12/2018. Total of 20 workers involve in chemical handling were sent for medical surveillance. Sighted the medical 	
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Criterion / Indicator	Assessment Findings	Compliance
	surveillance report, noted that all workers went for the surveillance were fit to work as pesticides and chemical handling job.	

Criterion / Indicator	Assessment Findings	Compliance	
<p>4.7.2</p>	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>- Major compliance -</p>	<p>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.</p> <p>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. Refer to revisited CHRA report for Bukit Benut POM, (JKKP HIE 127/171-2(166) dated 2 February 2019.</p> <p>For Lambak Estate, CHRA report reference; CHRA(J)/15-08/02 dated 13 October 2015 by JKKP HIE 127/171-2(363) has include the new chemical used for trunk injection, namely Acephate under class III category.</p> <p><u>Bukit Benut Estate</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 21/3/2019 for annual review by the HIRARC review team. Additionally, review for workshop and harvesting was done on 1/6/2019 and 1/4/2019 respectively due to accident occur at both work station.</p> <p><u>CEP Niyor Estate</u> HIRARC review was conducted on annually basis or when accident happen in the estate. As for FY 2019, the HIRARC has been reviewed for harvesting on 26/4/2019, 1/4/2019 and 29/3/2019 due to accident occur at both work station.</p>	<p>Complied</p>

<p>4.7.3</p>	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - 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>Bukit Benut Estate</u></p> <ul style="list-style-type: none"> i. New MB driver training dated 5/7/2019 ii Inspection of MB/tractor safety in the workshop dated 29/5/2019 iii. Crop Quality for Premium Quality Oil training dated 26/4/2019 iv. Proper Calibration of Control Droplet Applicator during spraying training dated 20/4/2019 v. Proper Ablation at immature training dated 19/4/2019 vi. Inspection of contractor driver competency training dated 18/4/2019 vii. Inspection of Estate driver competency training dated 17/4/2019 viii. iCare Safety and health townhall 7.0 dated 4/4/2019 ix. Proper Oil Palm Circle Cleaning by Using Blower training 19/2/2019 x. Proper Harvesting of Ripe Bunches training dated 12/2/2019 xi. Proper PPE and circle spraying at Immature field on 9/1/2019 xii. Safety and Proper PPE for CDA spraying training dated 10/12/2018 xiii. Safety and proper PPE during Cyphermethrin Spraying training dated 22/11/2018 <p><u>CEP Niyor Estate</u></p> <ul style="list-style-type: none"> i. Scheduled waste handling training dated 27/8/2018 ii. Harvesting SOP and PPE training dated 19/4/2019 iii. Safety Townhall 7.0 training dated 5/4/2019 iv. Tractor driver training dated 13/3/2019 <p>List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p>	<p>Minor nonconformance</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> i) Sterilizer and boiler/power operator – Safety Helmet, Semi leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff ii) Lab operator – Respirator (double cartridge) Nitrile Glove (chemical resistant), safety boots, Ear plug (NRR = 24 dB) iii) Field workers (sprayer, manurer & harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover <p>Observed at boiler station; Inadequate PPE and working tools used by 3 workers while installing the boiler front header cover. Manual lifting of steel plate was observed without proper working tools such as chain block as they are working on the boiler platform without body harness. Thus, a minor NC was raised.</p>	

<p>4.7.4</p>	<p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>Assistant manager and QA at each of the operating units are appointed as OSH Coordinators and Estate Hospital Assistant as Safety and Health Committee Secretary. OSH Committees meeting conducted quarterly and meeting minutes includes issues raised and action taken form workplace inspection report etc. The latest meeting was conducted on the 25/6/19 at Bukit Benut Palm Oil Mill. All members has attended the meeting with discussion on the accident review, safety improvement plan, issues from workers has been discussed and action to be taken. There was no major issue. Sample of meeting minute checked; 1st: 31/1/19, 2nd: 30/4/19</p> <p><u>Bukit Benut Estate:</u> The Estate Manager has been appointed as chairman of safety committee as per letter dated 1/4/2019 signed by the Regional General Manager, Johore Central Zone.</p> <p>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 3/6/2019, 1/3/2019 and 3/12/2018. 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, and Medical Surveillance report.</p> <p><u>CEP Niyor Estate:</u> The Estate Manager has been appointed as chairman of safety committee as per letter dated 12/7/2019 signed by the Regional General Manager, Johore Central Zone.</p> <p>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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Criterion / Indicator	Assessment Findings	Compliance
	<p>conducted on quarterly basis. Sighted the latest ESH Committee meeting minutes conducted on 8/5/2019, 13/2/2019 and 16/11/2018. In the meeting discussed on Workplace Inspection report, Accident report, HIRARC Review, PSQM and GCAD report, training, and Medical Surveillance report.</p>	

Criterion / Indicator	Assessment Findings	Compliance	
<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>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>Estates visited has established Emergency Response Team. ERP training was continuously conducted to ensure the awareness to all employee. Noted during interview with sampled workers at estates visited, the housing area was provided with fire extinguisher. Noted the workers interviewed shows the understanding on the necessary steps to be taken during emergency such as fire.</p> <p>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>Bukit Benut Estate</u></p> <ul style="list-style-type: none"> i. Fire drill training with Fire Department dated 2/5/2019 ii. First Aider training dated 9/7/2019 <p><u>CEP Niyor Estate</u></p> <ul style="list-style-type: none"> i. Fire drill training with Fire Department dated 24/7/2019 ii. First Aider training dated 19/7/2019 	<p>Complied</p>

<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>Bukit Benut Estate:</u> Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for March, April, and May 2019. Foreign workers has been registered under SOCSO. Sighted sampled registration application letter dated 2/7/2019, 12/6/2019 and 18/5/2019. Refer letter no. 208/E12/CAN07201900006104, 208/E12/CAN06201900038967 and 208/E12/CAN05201900101532.</p> <p>Sighted the Insurance Compensation application form P.P.2 and Lab 90 submitted to Jabatan Tenaga Kerja Kluang dated 3/6/2019 and 4/4/2019.</p> <p><u>CEP Niyor Estate:</u> Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for March, April, and May 2019. Foreign workers has been registered under SOCSO. Sighted sampled registration application letter dated 15/4/2019. Refer letter no. 208/E12/CAN04201900095642.</p> <p>Sighted the Insurance Compensation application form submitted to Jabatan Tenaga Kerja Kluang dated 2/5/2019. The compensation has been paid to the workers as per letter ref no. E12HUS190000639 dated 9/5/2019.</p> <p><u>Lambak Estate</u> New SOCSO coverage starting January 2019. Sample workers checked:</p> <table border="1" data-bbox="981 1268 1870 1364"> <thead> <tr> <th>Employee no.</th> <th>Policy @ KSPA no.</th> <th>Effective date</th> </tr> </thead> <tbody> <tr> <td>M1835470</td> <td>201900394564</td> <td>1/1/19</td> </tr> </tbody> </table>	Employee no.	Policy @ KSPA no.	Effective date	M1835470	201900394564	1/1/19	<p>Complied</p>
Employee no.	Policy @ KSPA no.	Effective date							
M1835470	201900394564	1/1/19							

Criterion / Indicator		Assessment Findings				Compliance															
		M0523185	201900395918	1/1/19																	
		AU207232	2019003396045	1/1/19																	
		Checked social security payment, "Jadual Caruman" @ 8A form for July 2019 involving 143 workers. Refer to employer ID code, E1200000782A.																			
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	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: <table border="1" data-bbox="981 786 1868 1034"> <thead> <tr> <th>Year</th> <th>Bkt Benut POM</th> <th>Bkt Benut Est</th> <th>Lambak Est</th> <th>CEP Niyor Est</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>1 case (8 LTI)</td> <td>2 cases (29 LTI)</td> <td>7 cases (156 LTI)</td> <td>5 cases (13 LTI)</td> </tr> <tr> <td>2019 to date</td> <td>1 case (44 LTI)</td> <td>-</td> <td>2 cases (40 LTI)</td> <td>-</td> </tr> </tbody> </table>				Year	Bkt Benut POM	Bkt Benut Est	Lambak Est	CEP Niyor Est	2018	1 case (8 LTI)	2 cases (29 LTI)	7 cases (156 LTI)	5 cases (13 LTI)	2019 to date	1 case (44 LTI)	-	2 cases (40 LTI)	-	Complied
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Criterion 4.8:		All staff, workers, smallholders and contract workers are appropriately trained.																			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.8.1</p>	<p>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.</p> <p>- Major compliance -</p> <p>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.</p> <p><u>Bukit Benut Estate</u> The estate has established the training program FY 2019 and documented in Scheduled in House Training FY 2019. 26 training has been programed throughout the year.</p> <p><u>CEP Niyor Estate</u> The estate has conducted training need analysis and documented in training matrix FY 2019. 17 training were identified and programed throughout the year. The training program includes safety and health, environment and social.</p>	<p>Complied</p>

<p>4.8.2</p>	<p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>The estates visited maintain records for all training conducted for the employee. Sighted the sampled training records as follows:</p> <table border="1" data-bbox="981 459 1870 1166"> <thead> <tr> <th>Date of training</th> <th>Training topic</th> <th>Trainer</th> </tr> </thead> <tbody> <tr> <td>9/7/19</td> <td>First aid training</td> <td>EHA</td> </tr> <tr> <td>8-9/7/19</td> <td>Tractor/backhoe training</td> <td>PSQM</td> </tr> <tr> <td>23/7/19</td> <td>OHSA hearing conservation training</td> <td>Assistant Manager</td> </tr> <tr> <td>4/4/19</td> <td>iCARE Safety and Safety Town hall 7.00</td> <td>Mill Manager</td> </tr> <tr> <td>6, 7 & 14/4/19</td> <td>ERP and Fire Drill training (Joint drill with BOMBA)</td> <td>BOMBA</td> </tr> <tr> <td>10/7/19</td> <td>Chemical Safe Handling Training</td> <td>R&D department</td> </tr> <tr> <td>21/2/19</td> <td>PPE training</td> <td>Mill Assistant</td> </tr> <tr> <td>21/2/19</td> <td>Chemical Handling and Water treatment training</td> <td>NALCO</td> </tr> </tbody> </table> <p><u>Bukit Benut Estate</u> i. New MB driver training dated 5/7/2019 ii. Inspection of MB/tractor safety in the workshop dated 29/5/2019 iii. Crop Quality for Premium Quality Oil training dated 26/4/2019 iv. Proper Calibration of Control Droplet Applicator during spraying training dated 20/4/2019</p>	Date of training	Training topic	Trainer	9/7/19	First aid training	EHA	8-9/7/19	Tractor/backhoe training	PSQM	23/7/19	OHSA hearing conservation training	Assistant Manager	4/4/19	iCARE Safety and Safety Town hall 7.00	Mill Manager	6, 7 & 14/4/19	ERP and Fire Drill training (Joint drill with BOMBA)	BOMBA	10/7/19	Chemical Safe Handling Training	R&D department	21/2/19	PPE training	Mill Assistant	21/2/19	Chemical Handling and Water treatment training	NALCO	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>v. Proper Ablation at immature training dated 19/4/2019 vi. Inspection of contractor driver competency training dated 18/4/2019 vii. Inspection of Estate driver competency training dated 17/4/2019 viii. iCare Safety and health townhall 7.0 dated 4/4/2019 ix. Proper Oil Palm Circle Cleaning by Using Blower training 19/2/2019 x. Proper Harvesting of Ripe Bunches training dated 12/2/2019 xi. Proper PPE and circle spraying at Immature field on 9/1/2019 xii. Safety and Proper PPE for CDA spraying training dated 10/12/2018 xiii. Safety and proper PPE during Cyphermethrin Spraying training dated 22/11/2018</p> <p><u>CEP Niyor Estate</u> i. Scheduled waste handling training dated 27/8/2018 ii. Harvesting SOP and PPE training dated 19/4/2019 iii. Safety Townhall 7.0 training dated 5/4/2019 iv. Tractor driver training dated 13/3/2019</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>		

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Criterion / Indicator	Assessment Findings	Compliance
5.1.1 An environmental impact assessment (EIA) shall be documented. - Major compliance -	<p><u>Bukit Benut Estate</u> The estate has established the Environmental Management Plan/Pollution Prevention Plan FY 2019 base on the significant impacts identified in the EAI/EIE conducted. The plan stated the Environmental issue, mitigating measures and person responsible. The plan was reviewed on annually basis and latest review was conducted on 1/3/2019 by the Medical Assistant and Estate Manager. The plan was monitored on monthly basis.</p> <p><u>CEP Niyor Estate</u> The estate has established the Environmental Management Plan/ FY 2019 base on the significant impacts identified in the EAI/EIE conducted. The plan stated the Management plan, objective, category, location, mitigating measures, monitoring frequency and person responsible. The plan was reviewed on annually basis monitored on monthly basis.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<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><u>Bukit Benut Estate</u> The estate monitored the progress of the management plan on monthly basis. sighted the implementation of the plan as follows:</p> <ul style="list-style-type: none"> i. Sighted during site visit at the chemical premix area, waste water from the chemical mixing was collected in collection sump. The waste water was collected and use back for chemical mixing. ii. Sighted during site visit at the workshop, all parked and repaired vehicle have containment tray under the vehicle to prevent the oil spillage at the workshop. iii. Sighted the sample preventive maintenance vehicle records for MB 18, MB 19, TF 011, TC 001 and TC 002 for the month of July 2019. The vehicle operator checked the condition of the vehicle on daily basis. v. Sighted the vehicle service program FY 2019 displayed at the workshop. <p><u>CEP Niyor Estate</u> The estate monitored the progress of the management plan on monthly basis. sighted the implementation of the plan as follows:</p> <ul style="list-style-type: none"> i. Sighted during site visit at the chemical premix area, waste water from the chemical mixing was collected in collection sump. The waste water was collected and use back for chemical mixing. ii. Sighted during site visit at buffer zone area at water reservoir area for nursery, the buffer zone was demarcated with red color stick and fenced. There are no spraying activity along the buffer zone and the vegetation along are well preserved. The estate has placed signage of prohibition to conduct activity at buffer zone area. 	<p>Complied</p>

<p>5.1.3</p>	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p><u>Bukit Benut Estate</u> The estate has established the Environmental Management Plan/Pollution Prevention Plan FY 2019 base on the significant impacts identified in the EAI/EIE conducted. The plan stated the Environmental issue, mitigating measures and person responsible. The plan was reviewed on annually basis and latest review was conducted on 1/3/2019 by the Medical Assistant and Estate Manager. The plan was monitored on monthly basis.</p> <p><u>CEP Niyor Estate</u> The estate has established the Environmental Management Plan/ FY 2019 base on the significant impacts identified in the EAI/EIE conducted. The plan stated the Management plan, objective, category, location, mitigating measures, monitoring frequency and person responsible. The plan was reviewed on annually basis monitored on monthly basis.</p> <p>Monitoring protocol is based on mill's compliance schedule in lined with DOE's Guided Self Regulation (GSR).</p> <p><u>6 monthly audit by DOE registered environmental auditor</u></p> <p>2nd half (1/7/18 – 30/6/19)</p> <p>Audit date: 20th June 2019</p> <p>Report entitled Environmental Compliance Audit Report, by registered DOE auditor: EA 0065, CESSWI reg. no.: 3760</p> <p>4 NCs raised pertaining to :</p> <p>i)Final BOD discharge limit</p> <p>ii)CEMS to include PM monitoring (150 mg/m3), CL applied on 1/6/19 while waiting for completion of ESP installation.</p> <p>iii)Opacity reading > 20% in May 2019.</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		iv) No competent person for CePPOMET and CePSWAM. <u>Boundary noise monitoring</u> Date of monitoring: 24 th July 2018 (day and night monitoring) Night: 60-62 dBA > 55 dBA (point#1) Night: 64-66 dBA > 55 dBA (point#4) Sound meter calibration, GVM181719/L, valid until 23/3/19.	
Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.			
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 -	SOU 22 has conducted the HCV Assessment on 29/9 – 2/10/2015. The report specified that most of HCV area identified for SOU 22 falls under HCV category 4: Pond/River Reserve/ Water Catchment area. The total area is 32.94 Ha distributed among Lambak Elaeis, CEP Niyor, and Bukit Benut estates.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>5.2.2</p> <p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>Reference on appropriate measures expected to be maintain or enhance was based on the group procedure of Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System (SPMS); Section III; Version: 1; Year: 2008; Issue no.: 1; Issue date: 1/11/2008; Section no.: 5; Sub-section no.: 5.8: Biodiversity & Appendix 6: List of Protected Species.</p> <p>There is no RTE or high biodiversity value identified at SOU 22 as per HCV assessment report. Since the identified HCVs were water catchment only the management plans were established as following:</p> <ul style="list-style-type: none"> i. Ensure signage is maintain at site and retrievable ii. To update the monitoring record of terracing iii. To promote awareness on HCV iv. To identify how task relating to HCV/biodiversity are to be performed 	<p>Complied</p>
<p>5.2.3</p> <p>There shall b a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance -</p>	<p>Estate visited continuously conducted training to raise awareness to all employee on HCV and RTE. Training was program and documented in the annual training plan. The training was conducted by Manager, Asst, Manager or Executive from GSQM/RSQM with knowledge in the area. Sighted the training records for Southern Region HCV training by GSQM conducted on 26/7/2019.</p> <p>Additionally, the issue on HCV and RTE has been communicated to the workers during master briefing. Signage regarding prohibition of illegal hunting was erected at few strategic places in the estates.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	<p>There is no RTE or high biodiversity value identified at SOU 22 as per HCV assessment report. HCV area identified for SOU 22 falls under HCV category 4: Pond/River Reserve/ Water Catchment area.</p> <p><u>Bukit Benut Estate</u> The estate continuously conduct the HCV monitoring on quarterly basis. The HCV monitoring focusing on area, field no, observation (encroachment, wildlife issue/conflicts/sighting, pollution/erosion issue. Sighted the HCV monitoring records conducted on 2/7/2019, 15/4/2019, 5/1/2019.</p> <p><u>CEP Niyor Estate</u> The estate continuously conduct the HCV monitoring on monthly basis. Sighted the HCV monitoring report dated 18/7/2019, 21/6/2019 and 13/4/2019.</p>	<p>Complied</p>
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 -	<p>There was no HCV set-aside that needs any negotiation process with the local communities within Bukit Benut certification unit.</p>	<p>Complied</p>
<p>Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.1 All waste products and sources of pollution shall be identified and documented. - Major compliance -</p>	<p><u>Bukit Benut Estate</u> The estate has identified the waste products and source pollution and documented in Waste Management Plan Bukit Benut Estate FY 2019. The waste identified as follows:</p> <ul style="list-style-type: none"> i. Domestic waste – Rubbish, sewage ii. Scheduled waste – spent lubricants/hydraulic oil, Clinical waste, disposed containers, used rags, plastics, papers oil filter contaminated with scheduled waste. iv. Industrial waste – Reuse empty pesticides containers v. Construction waste – deconstruction of building debris <p><u>CEP Niyor Estate</u> The estate has identified the waste products and source pollution and documented in Environmental management Plan FY 2019 under section waste management. The waste identified as follows:</p> <ul style="list-style-type: none"> i. Domestic waste – Rubbish, sewage ii. Scheduled waste – spent lubricants/hydraulic oil, Clinical waste, disposed containers, used rags, plastics, papers oil filter contaminated with scheduled waste. iii. Industrial waste – scrap metal, Reuse empty pesticides containers 	<p>Complied</p>

<p>5.3.2</p>	<p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p>	<p>For estates, there are 2 options available for disposal. The empty chemical containers are categorised as non-scheduled wastes after the process of triple rinsing is undergone. The practice was based on the triple rinse procedure and in-line with national programme on recycling of used HDPE pesticide containers. Refer to approval letter issued by DOA, refer to JP KRP 207/12/471 JLD VI dated 7/12/15. Approved DOA contractor, SS Setia appointed to participate in the programme. The containers were mainly disposed through recycling companies (e.g. SS Setia Teknologi Enterprise). Whereas for used oil (SW305), was taken by Sime Darby Industries (SDI) whom was the company hired to carry out machinery & vehicles maintenance job, back to their premise. Refer to approval letter, reference no. AS(BB) 91/110/619/161 Jilid 14 (69) dated 6/9/11. In some cases, DOE's license contractor appointed for disposal of SW305 and SW410 when there is no SDI appointed for service and maintenance of tractors.</p> <p><u>Bukit Benut Estate</u> The estate maintain the inventory and disposal records for used chemical container. Sighted the latest disposal record for empty container as cash sale receipt no. 1341 dated 10/4/2019.</p> <p><u>CEP Niyor Estate</u> The estate maintain the inventory and disposal records for used chemical container. Sighted the latest disposal record for empty container as cash sale receipt no. 1396 dated 18/6/2019, 1325 dated 27/3/2019 and 1241 dated 13/12/2018. The disposal of used chemicals and containers were done in accordance with their schedule on waste management as planned. Stores for scheduled waste were inspected at audited sites i.e. Mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have a proper Scheduled Waste</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance						
	<p>Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Latest disposal records checked:</p> <table border="1" data-bbox="981 475 1863 1043"> <thead> <tr> <th data-bbox="981 475 1249 523">Operating Unit</th> <th data-bbox="1249 475 1550 523">Contractor</th> <th data-bbox="1550 475 1863 523">Disposal records</th> </tr> </thead> <tbody> <tr> <td data-bbox="981 523 1249 1043">Bukit Benut POM</td> <td data-bbox="1249 523 1550 1043">Kualiti Alam Sdn Bhd</td> <td data-bbox="1550 523 1863 1043"> 21/3/19: CN#091041-003-0020 for SW410 Quantity: 0.0068 mt 21/3/19: CN#091041-004-0025 for SW409 Quantity: 0.3 mt 21/3/19: CN#091041-008-0003 for SW109 Quantity: 0.032 mt 21/3/19: CN#091041-012-0001 for SW430 Quantity: 0.028 mt </td> </tr> </tbody> </table>	Operating Unit	Contractor	Disposal records	Bukit Benut POM	Kualiti Alam Sdn Bhd	21/3/19: CN#091041-003-0020 for SW410 Quantity: 0.0068 mt 21/3/19: CN#091041-004-0025 for SW409 Quantity: 0.3 mt 21/3/19: CN#091041-008-0003 for SW109 Quantity: 0.032 mt 21/3/19: CN#091041-012-0001 for SW430 Quantity: 0.028 mt	
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Bukit Benut POM	Kualiti Alam Sdn Bhd	21/3/19: CN#091041-003-0020 for SW410 Quantity: 0.0068 mt 21/3/19: CN#091041-004-0025 for SW409 Quantity: 0.3 mt 21/3/19: CN#091041-008-0003 for SW109 Quantity: 0.032 mt 21/3/19: CN#091041-012-0001 for SW430 Quantity: 0.028 mt						

<p>5.3.3</p>	<p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>Estates visited has established Waste management Plan base on the identification and source of pollutions and the plan were available for review.</p> <p><u>Bukit Benut Estate</u> The estate has established the Waste Management Plan – Bukit Benut Estate FY 2019. In the management plan stated the type of waste, description, source of pollution, action to be taken and person responsible. Sighted the implementation of the management plan as follows: i. The estate maintain the inventory of scheduled waste generated and documented in the 'Inventori Buangan Terjadual' Sighted the inventory records for SW 305, SW 410 and SW 404 as todate July 2019. ii. The scheduled waste was disposed through licensed contractors. Sighted the latest disposal records as follows: a. 4/7/2019, SW 305, CN no. 18150 b. 18/4/2019, SW 305, CN no. 18140 c. 4/7/2019, SW 410, CN no. 19076 d. 18/4/2019, SW 410, CN no. 18141 e. 30/4/2019, SW 404, CN no. 0275654 iii. Domestic waste was collected twice a week on Wednesday and Sunday. Sighted the domestic waste collection records for the month of March, April, May, June and July 2019. The domestic was collection was also reported during weekly linesite inspection and VMO visit.</p> <p><u>CEP Niyor Estate</u> The estate has established waste management plan and documented in Environmental management Plan FY 2019 under section waste management. The management plan was established base on the waste identified. Sighted the implementation of the management plan as follows: i. i. Domestic waste was collected three times a week. Sighted the domestic waste collection records for the month of March, April, May, June and July</p>	<p>Minor</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>2019. The domestic was collection was also reported during weekly linesite inspection.</p> <p>ii. The estate maintain the inventory of scheduled waste generated and documented in the 'Inventori Buangan Terjadual' Sighted the inventory records for SW 305, SW 410 and SW 404 as todate July 2019.</p> <p>iii. The scheduled waste was disposed through licensed contractors. Sighted the latest disposal records as follows:</p> <ul style="list-style-type: none"> a. 24/4/2019, SW 410, CN no. 16506 b. 24/4/2019, SW 305, CN no. 16507 c. 30/4/2019, SW 404, CN no. 0275652 d. 14/1/2019, SW 404, CN no. 0245542 e. 16/7/2018 for SW 305, CN no. 15875 f. 16/7/2018 for SW 410, CN no. 16978 	
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		

<p>5.4.1</p>	<p>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>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of grid supply (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler.</p> <p>The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and coiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis respectively. Average of 83.02 kWh/CPO recorded from July to December 2018.</p> <p><u>Bukit Benut Estate</u> The estate has established plan to improve efficiency of fossil fuel consumption and documented in Pollution Prevention Plan. Sighted the implementation as follows:</p> <p>i. Sighted the sample preventive maintenance vehicle records for MB 18, MB 19, TF 011, TC 001 and TC 002 for the month of July 2019. The vehicle operator checked the condition of the vehicle on daily basis. ii. Sighted the vehicle service program FY 2019 displayed at the workshop.</p> <p><u>CEP Niyor Estate</u> The estate has established the plan to improve efficiency of fossil fuel consumption and documented GHG Reduction plan. Sighted the implementation as follows:</p> <p>i. Monitoring for diesel usage was conducted on monthly basis. Sighted the monitoring records as follows:</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings		Compliance
		Month	usage	
		Jan 19	6408	
		Feb 19	5653	
		Mar 19	4728	
		Apr 19	5997	
		May 19	5655	
		Jun 19	3907	
Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.				
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law – EQA and Regulations 1974. No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.		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 -	Noted based on the records on the land clearing and felling for the replanting at visited estates, method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.		Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.				

<p>5.6.1</p>	<p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Aspect Impact for identifying activities that contributes significant impact to environment</p> <p>As prescribed under "Jadual Pematuhan, license# 004747, air emission from boiler stack have to be monitored twice per year. Stack sampling results for the last license period reported as per below:</p> <table border="1" data-bbox="981 619 1859 1058"> <thead> <tr> <th>Date of monitoring</th> <th>Stack no.3</th> </tr> </thead> <tbody> <tr> <td>1st half 2019 Report ref: ETD/SE/BBPOM/2019/03 /19048</td> <td>Solid particle (dust) – 7.69 mg/m³, dry@ 12%CO₂. Halogenated TOC – <0.0001 mg/m³ Non halogenated TOC – 0.0714 mg/m³ CO – 118.18 mg/m³ Opacity – not exceeding Ringellman 1</td> </tr> <tr> <td>2nd half 2018 Report ref: ETD/SE/BBPOM/2018/09 /18304</td> <td>Solid particle (dust) – 6.94 mg/m³, dry@ 12%CO₂. Halogenated TOC – <0.0001 mg/m³ Non halogenated TOC – 0.2083 mg/m³ CO – 125.85 mg/m³ Opacity – not exceeding Ringellman 1</td> </tr> </tbody> </table> <p>Ambient air monitoring</p> <table border="1" data-bbox="981 1121 1859 1377"> <thead> <tr> <th>Date of monitoring</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td>1st quarter 2019 (7/2/19) Ref: ETD/A/SDPSB/2019-01/18872</td> <td>Point A TSP: 48 ug/m³ SO₂: <0.001 ppm NO₂: <0.001 ppm</td> </tr> <tr> <td></td> <td>Point B TSP: 37 ug/m³</td> </tr> </tbody> </table>	Date of monitoring	Stack no.3	1 st half 2019 Report ref: ETD/SE/BBPOM/2019/03 /19048	Solid particle (dust) – 7.69 mg/m ³ , dry@ 12%CO ₂ . Halogenated TOC – <0.0001 mg/m ³ Non halogenated TOC – 0.0714 mg/m ³ CO – 118.18 mg/m ³ Opacity – not exceeding Ringellman 1	2 nd half 2018 Report ref: ETD/SE/BBPOM/2018/09 /18304	Solid particle (dust) – 6.94 mg/m ³ , dry@ 12%CO ₂ . Halogenated TOC – <0.0001 mg/m ³ Non halogenated TOC – 0.2083 mg/m ³ CO – 125.85 mg/m ³ Opacity – not exceeding Ringellman 1	Date of monitoring	Results	1 st quarter 2019 (7/2/19) Ref: ETD/A/SDPSB/2019-01/18872	Point A TSP: 48 ug/m ³ SO ₂ : <0.001 ppm NO ₂ : <0.001 ppm		Point B TSP: 37 ug/m ³	<p>Complied</p>
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Criterion / Indicator	Assessment Findings		Compliance
	<p>2nd quarter 2019 (23/4/19) Ref: ETD/A/SDPSB/2019-04/19231</p>	<p>SO₂: <0.001 ppm NO₂: <0.001 ppm</p> <hr/> <p>Point A TSP: 51 ug/m³ SO₂: <0.001 ppm NO₂: <0.001 ppm</p> <p>Point B TSP: 48 ug/m³ SO₂: <0.001 ppm NO₂: <0.001 ppm</p>	
<p>The emissions of all parameters tested were complied with their respective limits as stipulated in the EQ (Clean Air) Regulations 2014 and Malaysian Environmental Air Guideline.</p> <p>Smoke emission was monitored using online system (CEMS-DIS) to DOE based on the transmitted data from boiler smoke density indicator and recorder. Emission result was found in compliance with the regulatory limit.</p> <p>For effluent discharge, regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE. Refer to Indicator 4.4.3 for details</p>			

Criterion / Indicator		Assessment Findings	Compliance
5.6.2	<p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.</p> <p>- Major compliance</p>	<p>For the estate, GHG emissions identified including CO_x, SO_x and NO_x from various sources including fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area.</p> <p>For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization. 5 years plan for GHG reduction (phase I, 20 mills (Malaysia) was sighted. Programme such as feed in tariff (FIT), flaring, CNG, CaP, Co-gen was included in the plan.</p> <p>The Carbon Emission Reduction Strategy is the overall implementation plan that cuts across SDP's value chain- upstream, downstream and other related business. The group target is to reduce emission by 40% at 2021.</p>	Complied
5.6.3	<p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.</p> <p>- Minor compliance -</p>	<p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>The water samples were sent to Sime Darby R&D Laboratory for analysis. Records are maintained and verified on-site to have met the permissible regulatory limits. Quarterly reporting to DOE was also done and record documented.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied.</p>	Complied

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

Criterion / Indicator	Assessment Findings	Compliance
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.		
6.1.1 A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	<p>Latest SOU 22 Bukit Benut assessment was conducted on 16-19 May 2019 by personnel from Sime Darby Plantation Sustainability Strategy Unit of PSQM Department as per records of Social Impact Assessment (SIA) Report and Management Plan on Social Impact Assessment.</p> <p><u>Bukit Benut Estate:</u> Latest external stakeholder consultation meeting was conducted on 21/6/2019, internal/workers committee (NUPW/AMESU) meeting on 11/4/2019 and gender committee meeting on 20/6/2019.</p> <p><u>CEP Niyor Estate:</u> Latest external stakeholder consultation meeting was conducted on 25/6/2019, internal/workers committee (NUPW/AMESU) meeting on 18/4/2019 and gender committee meeting on 12/7/2019.</p>	Complied
6.1.2 There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	<p><u>Bukit Benut Estate:</u> Records of Social Impact Assessment (SIA) Report (Assessment date: 16-19/5/2019) and Management Plan on Social Impact Assessment dated 21/6/2017 shown assessment done with participation of affected parties among internal and external stakeholders. Management action plan reviewed on 4/4/2019 also included few social aspects based on latest external stakeholder consultation meeting conducted on 4/4/2019, internal/workers committee (NUPW/AMESU) meeting on 11/4/2019 and gender committee meeting on 20/6/2019.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.1.3</p> <p>Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.</p> <p>- Major compliance -</p>	<p><u>Bukit Benut Estate:</u> Plans for avoidance or mitigation of negative impacts and promotion of positive ones was established as management action plan on social impact assessment which was last reviewed on 21/6/2019 that included few social aspects based on latest external stakeholder consultation meeting conducted on 4/4/2019, internal/workers committee (NUPW/AMESU) meeting on 11/4/2019 and gender committee meeting on 20/6/2019. The plan detailing Areas of Concerns/Key Findings, Action Plan, Status, Time Frame and Person In-charge for respective social impacts identified during assessment.</p> <p><u>CEP Niyor Estate:</u> Plans for avoidance or mitigation of negative impacts and promotion of positive ones was established as management action plan on social impact assessment which was last reviewed on 21/6/2019 that included few social aspects based on latest external stakeholder consultation meeting conducted on 25/6/2019, internal/workers committee (NUPW/AMESU) meeting on 18/4/2019 and gender committee meeting on 12/7/2019. The plan detailing Areas of Concerns/Key Findings, Action Plan, Status, Time Frame and Person In-charge for respective social impacts identified during assessment.</p>	<p>Complied</p>
<p>6.1.4</p> <p>The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties.</p> <p>- Minor compliance -</p>	<p><u>Bukit Benut Estate:</u> Existing plan dated 1/5/2017 was last reviewed on 21/6/2019 upon completion stakeholder consultation meeting done on 4/4/2019 for external, 11/4/2019 for internal and and 20/6/2019 for gender committee.</p> <p><u>CEP Niyor Estate:</u> The plan was last reviewed on 27/6/2019 upon completion stakeholder consultation meeting done on 25/6/2019 for external, 18/4/2019 for internal and 12/7/2019 for gender committee.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder schemes included within Bukit Benut and CEP Niyor Estate of SOU 22 plantation.	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 -	<u>Bukit Benut Estate:</u> SDPSB has developed a documented procedure in Sustainable Plantation Management System on handling social issues, Appendix 5, Version 1, and Issue No.1, dated 01/4/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	<u>Bukit Benut Estate:</u> Nominated management official responsible for consultation and communication issues are Mr. Ramesh Rajagopal; Senior Assistant, Mr. Zulkifli Abu Bakar; Assistant Manager and Mr. Zairulnizam Mohd. Zaki; Assistant Manager of Bukit Benut Estate as per appointment letters all dated 20/4/2019. <u>CEP Niyor Estate:</u> Nominated management official responsible for consultation and communication issues is Mr. Mugilan a/l Balachandran; Assistant Manager of CEP Niyor Estate as per appointment letter dated 1/11/2019.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -</p>	<p><u>Bukit Benut Estate:</u> List of stakeholders available as per Details of Stakeholders Bukit Benut Estate SOU 22 updated 2/4/2019 records consist of authorities, local communities, contractors and vendors/suppliers. Internal stakeholders among all employees including local and foreign workers also available as per List of Local Workers and List of Foreign Workers. Records of communication including confirmation of receipt available as part of publicly available documents including records of Social Impact Assessment (SIA) Report, Management Plan on Social Impact Assessment, Complaint Book, External Complaint (form) – AP Post, S01 School Correspondence file and etc. Sighted a sample of latest official correspondence records with school (SK Ladang Bukit Benut) dated 12/1/2019 requested estate management to assist on football field grass cutting for preparation of school sports event.</p> <p><u>CEP Niyor Estate:</u> List of stakeholders available as per Details of Stakeholders CEP Niyor Estate SOU 22 updated 26/4/2019 records consist of authorities, local communities, smallholders neighbour, contractors and vendors/suppliers. Internal stakeholders among all employees including local and foreign workers also available as per List of Local Workers and List of Foreign Workers. Records of communication including confirmation of receipt available as part of publicly available documents including records of Social Impact Assessment (SIA) Report, Management Plan on Social Impact Assessment, Complaint Book, External Complaint (form) Social file and etc. Sighted a sample of latest official correspondence records with school (SK Kampung Melayu Niyor) dated 24/2/2019 requested estate management to assist on installing and dismantling of tents used for school sports event.</p>	<p>Complied</p>
<p>Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p>		

Criterion / Indicator		Assessment Findings	Compliance
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 -	<u>Bukit Benut & CEP Niyor Estate:</u> A documented dispute resolution procedure is available in the Estate Quality Management System (EQMS) Manual which is effective, timely, appropriate and open to any affected parties. The complaint and grievances is open to effected parties including internal and external stakeholders.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	The mill management has implemented internal/external and Record of Request Book logbook and Borang Aduan/Cadangan for CEP Niyor Estate. Most of the complaints were regarding repairs the housing facilities, request for documents, request for giving the seminar and others. The management has taken action to rectify the problem. The estate’s management has implemented Workers’ quarters/office/building repairs complaint form for internal workers. Most of the complaints were regarding house repair such as toilet clogged. No other complaint received other than housing facilities.	Complied
Criterion 6.4:			
Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	<u>Bukit Benut & CEP Niyor Estate:</u> SOP to identify legal and customary rights as well as people entitled to compensation has been established with titled “Handling Land Disputes” dated 1/11/2008. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied

Criterion / Indicator	Assessment Findings	Compliance
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>Complied</p>
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>Complied</p>
<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>		

<p>6.5.1</p>	<p>Documentation of pay and conditions shall be available. - Major compliance -</p>	<p><u>Bukit Benut Estate:</u> Documentation of pay and conditions available as per sample sighted as following: - Employee ID # 134107 (Malaysia); Date joined: 1/6/2017; Post: Field Worker - Employee ID # 134574 (Malaysia); Date joined: 1/7/2017; Post: Field Worker - Employee ID # 117001 (Malaysia); Date joined: 1/7/2019; Post: Field Worker - Employee ID # 147963 (Indonesia); Date joined: 25/1/2019; Post: Harvester - Employee ID # 140638 (Indonesia); Date joined: 13/1/2019; Post: Harvester - Employee ID # 141440 (India); Date joined: 28/3/2018; Post: Harvester - Employee ID # 90285 (Bangladesh); Date joined: 3/5/2018; Post: Sprayer/Weeder - Employee ID # 136523 (Nepal); Date joined: 30/8/2017; Post: Field Worker - Employee ID # 96849 (Myanmar); Date joined: 1/11/2013; Post: Field Worker</p> <p><u>CEP Niyor Estate:</u> Documentation of pay and conditions available as per sample sighted as following: - Employee ID # 015750 (Malaysia); Date joined: 1/10/1998; Post: General Worker - Employee ID # 105556 (Indonesia); Date joined: 1/4/2019; Post: Harvester - Employee ID # 126479 (Indonesia); Date joined: 13/10/2016; Post: Harvester - Employee ID # 065902 (Malaysia); Date joined: 1/5/2011; Post: General Worker</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Employee ID # 100080 (Indonesia); Date joined: 28/12/2018; Post: Field Worker - Employee ID # 133712 (Indonesia); Date joined: 25/5/2017; Post: Field Worker - Employee ID # 134943 (Indonesia); Date joined: 13/7/2017; Post: Field Worker - Employee ID # 071019 (India); Date joined: 1/5/2019; Post: Harvester 	
6.5.2	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p> <p><u>Bukit Benut Estate:</u></p> <ul style="list-style-type: none"> - Existing foreign worker work agreement still contained para 8. Foreign Workers Compensation Scheme (FWCS) as per sample for foreign worker work agreement template EMP01/INDO/2017/01 - Sime Darby Plantation HQ HR has already notify operating units via email dated 30/5/2019 on the new templates for foreign worker work agreement that has been revised para 8. Foreign Workers Compensation Scheme (FWCS) to SOCSO effective immediately to be use for new foreign worker employment 	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.3</p>	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –</p> <p>Based on visit to the line site and interview with the worker, confirmed that the estates provide adequate housing, water supplies, medical, educational and welfare amenities in accordance with Workers’ Minimum Standard of Housing and Amenities Act 1990 (Act 446). There is on-going upgrading of housing. Water is supplied to workers housing through SAJ piping while electricity via TNB grid supply.</p> <p>Accesses to food for the workers are considered adequately and sufficiently as the estate is very near to the town.</p> <p><u>Bukit Benut Estate:</u> Line site inspection was done weekly by HA and recorded in the log book. Weekly summary reported via checklist for Bukit Benut estate housing inspection i.e. housing complex/NEST/Community Hall Inspections records shown latest inspection done by Medical Assistant dated on 25/7/2019. Previous inspection done on 18/7/2019. Other records of inspection including Crèche book VMO’s report latest dated 17/7/2019 and 24/7/2019 as well as VMO visiting book latest dated 13/7/2019 and 17/7/2019.</p> <p><u>CEP Niyor Estate:</u> Line site inspection was done weekly by HA and recorded in the log book. Weekly summary reported via checklist for Bukit Benut estate housing inspection i.e. housing complex/NEST/Community Hall Inspections records shown latest inspection done by Medical Assistant dated on 26/7/2019. Previous inspection done on 12/7/2019. Other records of inspection including VMO visiting book latest dated 27/7/2019 and 13/7/2019.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
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><u>Bukit Benut Estate:</u> There's a grocery shop operating within Bukit Benut Estate housing compound i.e. Chop Nam Bee Enterprise. Consultation with workers confirm that the price of daily sundries sold at the shop to be fair and goods available are sufficient. Furthermore, the estate located near Kluang town and workers are also convenient to get to the town when needed.</p> <p><u>CEP Niyor Estate:</u> There's a grocery shop operating within Bukit Benut Estate housing compound i.e. Eng Hup Heng Enterprise. Consultation with workers confirm that the price of daily sundries sold at the shop to be fair and goods available are sufficient. Furthermore, the estate located near Kluang town and workers are also convenient to get to the town when needed.</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>			
6.6.1	<p>A published statement in local languages recognising freedom of association shall be available.</p> <p>- Major compliance -</p>	<p><u>Bukit Benut & CEP Niyor Estate:</u> A Social Policy dated January 2015 was established and signed by Managing Director stated the employees have freedom of association. The employees can freely decide to join workers union.</p>	Complied
6.6.2	<p>Minutes of meetings with main trade unions or workers representatives shall be documented.</p> <p>- Minor compliance -</p>	<p><u>Bukit Benut Estate:</u> Latest meeting between estate management and representatives of NUPW/AMESU was conducted on 11/4/2019 as per minutes of meeting records maintained.</p> <p><u>CEP Niyor Estate:</u> Latest meeting between estate management and representatives of NUPW/AMESU was conducted on 11/4/2019 as per minutes of meeting records maintained.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	<u>Bukit Benut Estate:</u> A Child Labor policy dated January 2015 was established and signed by Managing Director. Review of records of employment and consultation with workers confirmed that the minimum age policy and legal requirement were met and no employees below the age of 18 employed in Bukit Benut 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 -	SDPSB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	All groups among local and foreign workers are given equal opportunity and treated fairly on the housing provided, job that has been offered, salary and etc. Salary of local workers and foreign workers were based on MAPA/NUPW and Minimum Wage Order 2016 and no discrimination happened.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	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.			

Criterion / Indicator		Assessment Findings	Compliance
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 -	SDPSB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. For Bukit Benut Estate, latest briefing by estate management to all workers was conducted during muster ground on 8/1/2019 explaining on HCV, COBC, RSPO, MSPO and Policies including sexual harassment prevention. For CEP Niyor Estate, latest briefing by estate management to all workers was conducted during Town Hall: iCARE Safety & Health Townhall 7.0 on 5/4/2019 explaining on all matters relevant to Safety, Environmental, HCV, COBC, RSPO, MSPO and Policies including sexual harassment prevention.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPSB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Communication also done directly and indirectly through programs such as Gender activity 5/7/2019 – Majlis Rumah Terbuka Raya Ala 'Pot Luck'.	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 -	The mill and estate management have established a Gender Committee to discuss and resolve issues related to women. The managements had implemented procedure for sexual harassment grievance and complaint form to any incidences of sexual harassment is implemented. For Bukit Benut Estate, communications done latest through external stakeholder consultation meeting was conducted on 21/6/2019, internal/workers committee (NUPW/AMESU) meeting on 11/4/2019 and gender committee meeting on 20/6/2019. For CEP Niyor Estate, communications done latest through external stakeholder consultation meeting was conducted on 25/6/2019, internal/workers committee (NUPW/AMESU) meeting on 18/4/2019 and gender committee meeting on 12/7/2019.	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 -	Bukit Benut POM process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	<u>Bukit Benut & CEP Niyor Estate:</u> The contract documents template were included with the provision for contractors to comply with all Sime Darby Plantation requirements including Code of Business Conduct (COBC) particularly under items 7 and 8 of the COBC which is made available online at www.simedarby.com for the Vendor and its Representatives review.	Complied

Criterion / Indicator	Assessment Findings	Compliance
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 -	Contracts were included with provision of all Sime Darby Requirements and signed by contractors as agreements. Evidence available as per sample sighted as following: <u>Bukit Benut Estate:</u> - Agreement between Sime Darby Plantation Berhad Bukit Benut Estate and LTT Transport Agency (Contract School Bus Transport); Contract period: 1/1/2019 – 31/12/2019 - Agreement between Sime Darby Plantation Berhad Bukit Benut Estate and Sivanathan Maju Enterprise (EFB Transport); Contract period: 1/1/2019 – 31/12/2019 - Agreement between Sime Darby Plantation Berhad Bukit Benut Estate and Zaidah Terus Maju Enterprise (Contract Grass Cutting); Contract period: 1/1/2019 – 31/12/2019 <u>CEP Niyor Estate:</u> - Memorandum of Agreement between Sime Darby Plantation Berhad CEP Niyor Estate and Sakthi Enterprise (Machinery Supply – Backhoe NCM 5008); Contract period: 1/11/2018 – 31/10/2019 - Memorandum of Agreement between Sime Darby Plantation Berhad CEP Niyor Estate and Eng Hup Heng Majujaya Enterprise (Tenancy Agreement); Tenancy period: 1/1/2019 – 31/12/2019	Complied
6.10.4 Agreed payments shall be made in a timely manner. - Minor compliance -	<u>Bukit Benut Estate:</u> Agreed payments made in timely manner as per sample sighted as following: - Contract form payment doc. # 4300472892; Date: 1/7/2019; Contractor: Sakthi Enterprise - Contract form payment doc. # 43004669195; Date: 1/6/2019; Contractor: RKSP Brothers - Contract form payment doc. # 4300462075; Date: 1/4/2019; Contractor: LTT Transport Agency	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	<u>Bukit Benut Estate:</u> Contributions were made based on consultations results as per sample as following: - Football field grass cutting for preparation of school sports event SK Ladang Bukit Benut dated 12/1/2019 - Contribution for Kejohanan Merentas Desa SK Ladang Bukit Benut dated 24/1/2019 - Majlis Rumah Terbuka Raya Ala 'Pot Luck' to all employees via Gender community dated 5/7/2019 - Free bus for employees' children transport to school <u>CEP Niyor Estate:</u> Contributions were made based on consultations results as per sample as following: - Labour provision for installing and dismantling tents used for SK Kampung Melayu Niyor sports event dated 28/2/2019 and 3/3/2019 - School field grass cutting for preparation of school sports event SK Kampung Melayu Niyor dated 26/2/2019 - Provision of access to school children to use estate path for " <i>Aktiviti Kembara Hutan Peringkat Sekolah</i> " for SJK(T) CEP Niyor dated 15/11/2018	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	There were no scheme smallholders under the certification unit.	Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.			

Criterion / Indicator		Assessment Findings	Compliance
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	All employees are legal with local identification card for local employees and foreign employees are with valid passports and working permits. No evident of trafficked workers were found during the audit.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No contract substitution was noted in the document as well as based on the worker’s interview during line site visit.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Equal opportunity and non-discriminatory policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals.	Complied
Criterion 6.13:			
Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	<p>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.</p> <p>For Bukit Benut Estate, latest briefing by estate management to all workers was conducted during muster ground on 8/1/2019 explaining on HCV, COBC, RSPO, MSPO and Policies including sexual harassment prevention.</p> <p>For CEP Niyor Estate, latest briefing by estate management to all workers was conducted during Town Hall: iCARE Safety & Health Townhall 7.0 on 5/4/2019 explaining on all matters relevant to Safety, Environmental, HCV, COBC, RSPO, MSPO and Policies including sexual harassment prevention.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	This site is located at Peninsular Malaysia, hence this requirement is not applicable.	Not applicable
Principle 7: Responsible development of new plantings			
Bukit Benut Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this surveillance assessment. The immature areas are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>The company is continues committed to reduce pesticide use and hazardous agrochemical use. All operating units are not using paraquat and class 1a or 1b agrochemicals. Alternative for class 1b chemical, Acephate was introduced for Bagworm treatment which less hazardous under class III category.</p> <p>These efforts are continue to reflect the commitment to reduce the use of hazardous agrochemicals. Systemic herbicides such as glyphosate are used with increased efforts in IPM. Barn owl is being introduced as well. These are the continuous efforts from operating units to reduce pesticide use. All operating units have carried out annual review of the environmental and social aspects of its operations to identify improvements.</p> <p>The Social Action Plan has continued to work towards improving stakeholder relationship through engagement and dialogue besides further improving the workers housing. Initiative on KAIZEN project at operating units showed commitment towards continual improvement to improve safety and environment quality through 5s implementation. On the social improvement efforts, the operating units continue to have good relationship with stakeholders.</p>	<p>Complied</p>

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Appendix B: Approved Time Bound Plan

SDP- RSPO Certification Status for Malaysia Operations

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11-Aug-20	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	Mill was closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543594	N.A
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Mill was closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '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	

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

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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

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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

Legends

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

Appendix C: GHG Reporting Executive Summary

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

Emission per product	tCO ₂ e/tProduct
CPO	1.21
PKO	1.21

Extraction	%
OER	21.01
KER	5.43

Production	t/yr
FFB Process	119,255,78
CPO Produced	25,056.14
PKO Produced	0

Land Use	Ha
OP Planted Area	29,181.7
OP Planted on peat	562.4471
Conservation (forested)	0
Conservation (non-forested)	0
Total	29,744.1471

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	54,558.38	0.5	4,794.05	0.51	0	0	59,352.4	1.01
CO ₂ Emission from fertilizer	6,828.67	0.06	492.99	0.06	0	0	7,321.66	0.12
NO ₂ Emission	5,020.77	0.05	353.6	0.05	0	0	5,374.37	0.1
Fuel Consumption	595.72	0.01	64.93	0.01	0	0	660.65	0.02
Peat Oxidation	0	0	47.75	0.07	0	0	47.75	0.07
Sink								
Crop Sequestration	-51,714.1	-0.47	-4,544.14	-0.48	0	0	-56,258.24	-0.95

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Conservation Sequestration	0	0	0	0	0	0	0	0
Total	15,289.44	0.14	1,209.18	0.21	0	0	16,498.62	0.35

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	20368.76	0.17
Fuel Consumption	32.51	0
Grid Electricity Utilisation	1199.7	0.01
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	21,600.97	0.18

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	7,828.88
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 (%)	0
Divert to anaerobic diversion (%)	100

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

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

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence 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 Bukit Benut Oil Mill: RSPO_PO1000000194.	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.	Bukit Benut Oil Mill 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: 1-0008-04-000-00 since 06 September 2004. Company has registered in PalmTrace system as follows: Members ID – Bukit Benut Oil Mill: RSPO_PO1000000194. 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			

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.	Bukit Benut Oil Mill only received and processed FFB from own certified supplying estates. Declassification of the CPO or PK was done in accordance to the correct order.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Bukit Benut Oil Mill only produced IP certified palm product and the sales of product were IP or conventional. Therefore, Bukit Benut Oil Mill is certified with Module D: Identity Preserved.	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 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</p>	Yes

		16.0 Production Volume 17.0 Conversion Factors 18.0 Internal Audit 19.0 Complaints 20.0 Management Review	
	<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> <ol style="list-style-type: none"> Weighbridge tickets Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document Daily production summary report Record and balance Training records for SCCS <p>All the records were found to be up-to-date.</p>	Yes
	<ul style="list-style-type: none"> Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard. 	<p>The Mill Manager has the overall responsibility for the implementation of the SCCS requirements. The Mill Manager has appointed Assistant Engineer as person-in-charge for the RSPO/ MSPO SCCS. Appointment letter dated 27/9/2017 was sighted. Interviewed with the Assistant Engineer confirmed that he was able to demonstrate the implementation of their procedures in accordance to the standard.</p>	Yes
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<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 24/4/2019 by Sustainability Unit, GSQM. Seen the internal audit checklist and internal report found that 1 Major non-conformance was raised for SCCS. Corrective action has taken accordingly to rectify the non-conformance.</p>	<p>Yes</p>
<p>5.4. Purchasing and goods in</p>			
<p>5.4.1</p>	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the DO is as follows:</p> <ul style="list-style-type: none"> • Consignment note no. (47147) • Estate’s names (CEP Rengam – E031) • Date & time of delivery (1/7/19) • Field No. (2010A) • No. of bunches (963 bunches) • Vehicle no. (JMP3189) • Seal no. (107646) <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> • Weighbridge ticket no.:86975 • Name of estates (CEP Rengam – E031) • Field No. (2010A) • Name of driver (anonymous) • Vehicle no. (JMP3189) • Date & time in/out (11:59 AM, 12:06 PM) • Total bunches (963 bunches) • Seal no. (107646) <p>Net weight (12.78 mt)</p>	<p>Yes</p>

	<ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	The information was available in various documents such as delivery order and weighbridge tickets.	Yes
	<ul style="list-style-type: none"> The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. 	The mill has a list of certified FFB suppliers which has the information about certificate number and validity period. This is applied to both second and third party FFB suppliers [ref.: clause 7.2 of SOP for Sustainable Supply Chain and Traceability]	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. 	<p>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 East Mill, e.g. from Ulu Remis and Hadapan POM certification unit was verified. Validity check was done prior to each FFB delivery.</p> <p>Ulu Remis POM certification unit, certificate no. BVC-RSPO-20170705-1 valid from 5/1/17 – 10/4/21. (list of estates: Ulu Remis estate, ukit BAdak, Sembrong, Pekan Ropel, Tun Dr Ismail and Cenas Ropel)</p> <p>Hadapan POM certification unit, certificate no BVC-RSPO-20170623-01 valid from 23/6/17 – 28/3/21. (list of estates: CEP Rengam, Kulai, Layang and Seri Pulai)</p>	Yes
	<ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	NA – this part is applicable for supply chain actor after refinery.	Yes
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Addressed in the SOP clause 10.0 Non-conforming Products and/or Documents. Based on the procedure, where there is	Yes

		<p>contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: IP to MB to conventional.</p> <p>Material received with insufficient information shall be treated as non-conforming documents. The documents shall be investigated, verified and corrected in order to allow processing of material. Authorization for release shall be by the mill manager.</p>	
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 independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>Bukit Benut Oil Mill is using 3rd party transporter for CPO to buyers. The 3rd party transporter physically handled the palm product but the legal ownership is belongs to Bukit Benut Oil Mill 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, Teo Tuan Kwee 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 contractor has acknowledged on the addendum of RSPO/ SCCS/ MSPO dated 17/5/2019 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 on 29/6/2019.</p>	Yes

5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a. The site has legal ownership of all input material to be included in outsourced processes;	Not applicable. No outsourcing activity 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	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; 	Bkt Benut POM ensured the required information is available in document form. Sampled of PK contract: S/C-	Yes

	<ul style="list-style-type: none"> • 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>PSD/1905/PK0258 dated 13/5/19, quantity 300 mt (delivery month – may 2019)</p> <ul style="list-style-type: none"> • The name and address of the buyer; XXX • The name and address of the seller: KKS Bkt Benut, Kluang, Johor • The loading or shipment/ delivery date; e.g. 13/5/19 • 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); Palm Kernel (PK) RSPO IP • The quantity of the products delivered; e.g. 39.15 mt • Any related transport documentation; e.g. Despatch note e.g. #008072 • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 591229 • A unique identification number: palm trace no. TR- 70b767e9- c036 • Available in a few forms e.g. DN no., seal no., etc. <p>Bkt Benut POM ensured the required information is available in document form. Sampled of CPO contract: S/C-PSD/1905/CPO0280 dated 13/6/19, quantity 600 mt (delivery month – December 2018)</p> <ul style="list-style-type: none"> • The name and address of the buyer; XXX • The name and address of the seller: KKS Bkt Benut, Kluang Johor. • The loading or shipment/ delivery date; e.g. 13/6/19 • The date on which the documents were issued; 	
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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); Crude Palm Oil (CPO) RSPO IP • The quantity of the products delivered; e.g. 39.66 mt • Any related transport documentation; e.g. Despatch note e.g. #008148 • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 591229 • A unique identification number: palm trace no. TR- 83c7724b-258d • Available in a few forms e.g. DN no., seal no., etc. 	
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	Information is complete and available in various documents such as sales contract, mill weighbridge ticket, delivery note, transporter collection order.	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. 	Review period from July 2018 to July 2019. Shipping announcement details refer to table C.	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 	The registration of Palm Trace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the Palm Trace.	Yes

	their transaction in the RSPO IT platform and confirm upon receipt where applicable.		
5.7.2	The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. 	Summary of shipping announcement/confirmation is reported under table C and cross reference with table 7 and 8.	Yes
	<ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	Not applicable. Products are not sold beyond refinery.	Not Applicable
	<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. 	Conventional volume sold reported reconcile in 3 (three) monthly basis and reported under mass balance sheet.	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Final volume sold is based on shipping confirmation acknowledge by refinery or buyer.	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 Program for 2019 was developed where training for Supply Chain has been 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	Training for MSPO & RSPO Supply Chain was conducted on 23/7/2019 to all the personnel such as weighbridge	Yes

	chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	operator, laboratory personnel, auxiliary police and process workers. A regional training for SCCS training was carried out on 27/6/2019. Besides, training to contractors and the drivers was conducted on 29/6/2019. Seen the attendance list and training material of the training. Interviewed with the weighbridge operator found that he is able to demonstrate the understanding of RSPO SCCS.	
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	Conversion factor of CPO and PK production is depending on the actual OER and KER.	Yes

	Oleochemicals and its derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.		
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 which explained in the Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019.	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 Bukit Benut Oil Mill 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 Bukit Benut Oil Mill 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 Bukit Benut Oil Mill 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 Bukit Benut Oil Mill as to date.	Yes
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Bukit Benut Oil Mill 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 CPO and PK, it stated with product – Crude Palm Oil RSPO IP and Palm Kernel RSPO IP with RSPO Certificate Number indicated in the weighbridge tickets.	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.	Bukit Benut Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.	N/A

	<p>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.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>Bukit Benut Oil Mill 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 Bukit Benut Oil Mill 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 Bukit Benut Oil Mill 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 Bukit Benut Oil Mill and only producing crude and unfinished product. This is not applicable for POM.</p>	N/A

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

	applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Yes
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	No SG claim made.	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 requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Yes
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.	As to date, no RSPO trademark used by Bukit Benut Oil Mill.	Yes
Messaging (IP)			

	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>As to date, no RSPO trademark used by Bukit Benut Oil Mill.</p>	<p>Yes</p>
<p>MODULE B – MASS BALANCE SPECIFIC RULES</p>			
<p>Minimum Mass Balance content (MB)</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Not applicable as Bukit Benut Oil Mill is producing RSPO IP product and no MB claim made as to date.</p>	<p>N/A</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Not applicable as Bukit Benut Oil Mill is producing RSPO IP product and no MB claim made as to date.</p>	<p>N/A</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p>	<p>Not applicable as Bukit Benut Oil Mill is producing RSPO IP product and no MB claim made as to date.</p>	<p>N/A</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. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. • In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. 	<p>Not applicable as Bukit Benut Oil Mill is producing RSPO IP product and no MB claim made as to date.</p>	<p>N/A</p>

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

	Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made: 95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made	Not applicable as Bukit Benut Oil Mill is producing RSPO IP product and no MB claim made as to date.	N/A
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 29/7/2019 which chaired by Mill Manager.	Yes
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. 	Seen the meeting minutes found the following agenda was discussed: <ul style="list-style-type: none"> • Internal Audit RSPO- SCCS <ul style="list-style-type: none"> ➢ 1 Major NC raised during the internal audit and was closed on 20/6/2019. • Customer feedback <ul style="list-style-type: none"> ➢ No complaint received by external parties. 	Yes

	<ul style="list-style-type: none"> • Changes that could affect the management system. • Recommendations for improvement. 	<ul style="list-style-type: none"> • Process performance and product conformity <ul style="list-style-type: none"> ➢ No complaint on product quality from buyers. • Status of correction and corrective action <ul style="list-style-type: none"> ➢ All corrective actions were completed. • Follow up actions from previous management reviews <ul style="list-style-type: none"> ➢ Training SCCS to be provided to the new weighbridge operator completed on 6/6/2019. • Changes that could affect the RSPO-SCCS system <ul style="list-style-type: none"> ➢ No changes. • Recommendation for improvement <ul style="list-style-type: none"> ➢ Training to be carry out twice a year by GSQM to comply the training requirement. • Complaints and grievances <ul style="list-style-type: none"> ➢ No complaints and grievance obtained. • Other matters 	
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 management review 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: Identity Preserved)

D.1 Definition			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
D.1.1	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.	Bukit Benut palm oil mill received only certified FFB from supply base. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. There were diversion crop received from other certified estate for this review period.	Yes
D.2 Explanation			
D.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report	Yes
D.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).	Sime Darby Plantation Bhd held RSPO membership number: 1-0008-04-000-00 since 06 September 2004. Company has registered in PalmTrace system as follows: Members ID – Bukit Benut Oil Mill: RSPO_PO1000000194. Licensee valid until 4/10/2019 Member category : Oil Mill	Yes

D.3 Documented procedures		
D.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> <ul style="list-style-type: none"> 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 20.0 Management Review
	<p>b. The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.</p>	<p>The Mill Manager has the overall responsibility for the implementation of the SCCS requirements. The Mill Manager has appointed Assistant Engineer as person-in-charge for RSPO/ MSPO SCCS. Appointment letter dated 27/9/2017 was sighted. Interviewed with the Assistant Engineer confirmed that he was</p>

		able to demonstrate the implementation of their procedures in accordance to the standard.	
D.3.2	The site shall have documented procedures for receiving and processing 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
D.4 Purchasing and goods in			
D.4.1	The site shall verify and document the tonnage and sources of certified FFBS received.	<p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill. E.g. of information available in the DO is as follows:</p> <ul style="list-style-type: none"> • Consignment note no. (47147) • Estate’s names (CEP Rengam – E031) • Date & time of delivery (1/7/19) • Field No. (2010A) • No. of bunches (963 bunches) • Vehicle no. (JMP3189) • Seal no. (107646) <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> • Weighbridge ticket no.:86975 • Name of estates (CEP Rengam – E031) • Field No. (2010A) • Name of driver (anonymous) • Vehicle no. (JMP3189) • Date & time in/out (11:59 AM, 12:06 PM) • Total bunches (963 bunches) • Seal no. (107646) 	Yes

D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	<ul style="list-style-type: none"> Net weight (12.78 mt) Overproduction of certified tonnage recorded for the actual volume from July 2018 until July 2019; 134,919.13 mt which exceeded the registered certified tonnage of 121,332.60 mt. Thus, a major NC was issued.	Major nonconformance
D.5 Record keeping			
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. <i>IP Mill must report on real time basis.</i>	All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place. Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the FFB received. Records of certified FFB received verified during this audit. Sighted the Mass Balance Sheet monthly basis was updated with FFB receiving, FFB processed, CPO and PK production.	Yes
D.6 Processing			
D.6.1	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.	During this assessment it was confirmed that only certified source of FFB from own plantation is processed. This ensures that there is no possibility of mixing during processing.	Yes

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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit (July 2018-July 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	July 2018	8,651.64	0	8,651.64
2	August 2018	10,159.58	0	10,159.58
3	September 2018	12,480.33	0	12,480.33
4	October 2018	12,028.93	0	12,028.93
5	November 2018	11,326.35	0	11,326.35
6	December 2018	11,367.71	0	11,367.71
7	January 2019	10,505.30	0	10,505.30
8	February 2019	10,630.32	0	10,630.32
9	March 2019	9,787.17	0	9,787.17
10	April 2019	10,871.06	0	10,871.06
11	May 2019	10,722.05	0	10,722.05
12	June 2019	9,645.40	0	9,645.40
13	July 2019	6,743.28	0	6,743.28
Total		134,919.12	0	134,919.12

B. Monthly Records of Certified CPO & PK since the last audit (July 2018-July 2019)			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	July 18	1,761.78	468.18
2	Aug 18	2,102.57	628.65
3	Sept 18	2,534.30	681.89
4	Oct 18	2,511.81	641.72
5	Nov 18	2,349.56	591.71
6	Dec 18	2,446.25	645.16
7	Jan 19	2,235.31	566.93
8	Feb 19	2,314.89	593.36
9	Mar 19	2,037.59	519.95
10	Apr 19	2,205.21	569.58
11	May 19	2,281.15	584.33

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12	June 19	1,950.61	484.81
13	July 19	1,411.36	354.02
	Total	28,142.38	7,330.30

C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) (July 2018-July 2019)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	A	TR-77b84f87-5a4e, TR-0af15a0e- faf3,	6,100	0
2	B	TR-e21afb7d- d71c, TR-46e63f82-77ba, TR- 83c7724b-258d, TR-ea923f31-d0cd, TR-a2c4e269- 19c3, TR-f4447671- 0994, TR-d70cc0aa- 70b6, TR-67a7ba61- 757f, TR-9e323b2f- d496, TR-9caa62e6- 7912, TR-04fb9802-fcc0, TR-53017cf3- 05d5, TR- 003b0a84-1353, TR-4a37fb00-fe5b	9,528	0
3	C	TR-1a3b61cc- b319, TR-999ad17f- 5344, TR-7f057da6-bb24, TR-f787a8f8- 9370, TR- 89646494-574e, TR- 70b767e9-c036, TR- 9570a274-8e3d, TR-8a5c74fb-27da, TR-5e5004fa- 94f8, TR- 429633ce-d7c8	0	2,350
	Total		15,628	2,350

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any) (July 2018-July 2019)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
Nil				

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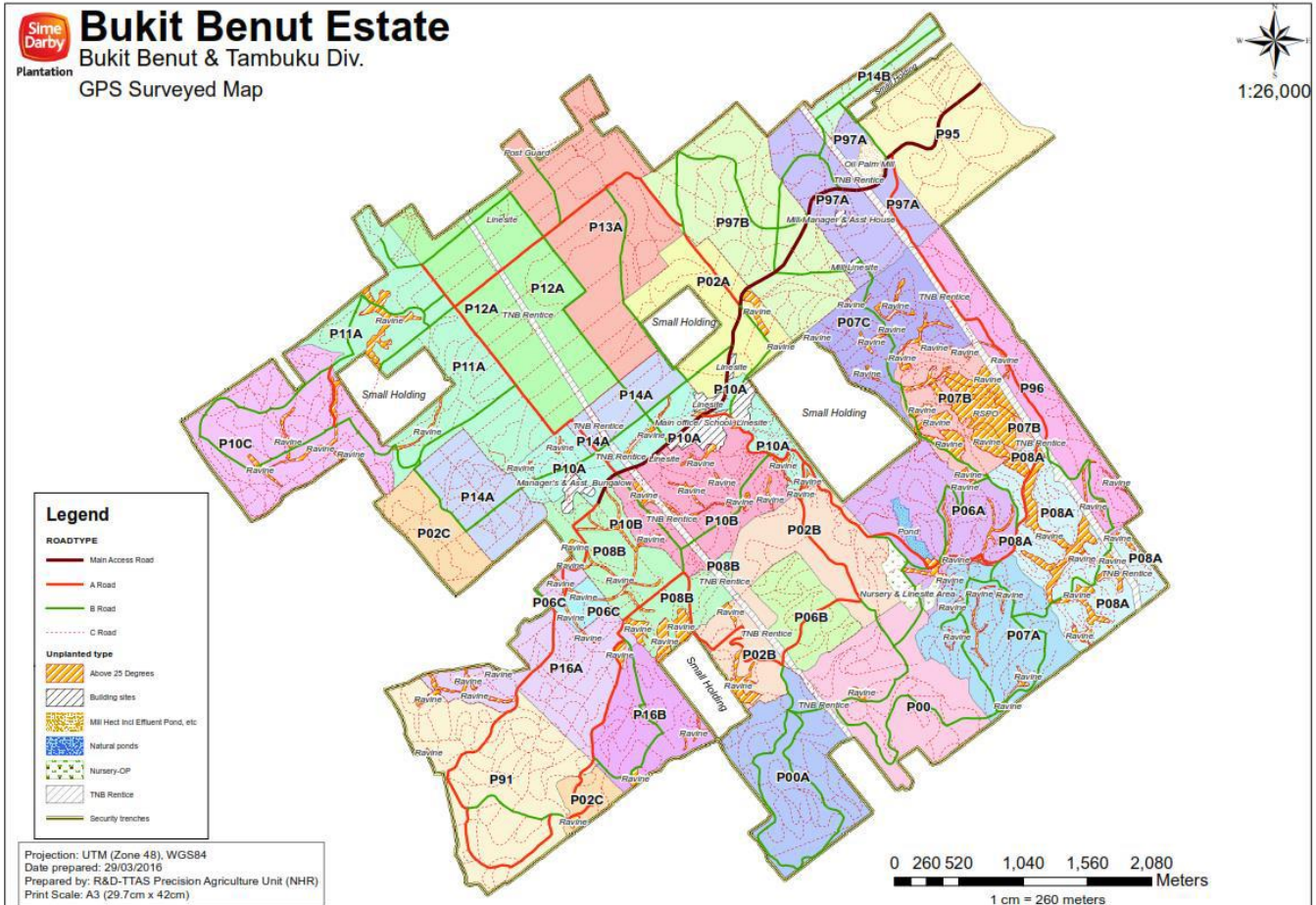
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) (July 2018-July 2019)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	VW	11,708	0
2	XY	0	4,743
		11,708	4,703

F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any) (July 2018-July 2019)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
Nil			

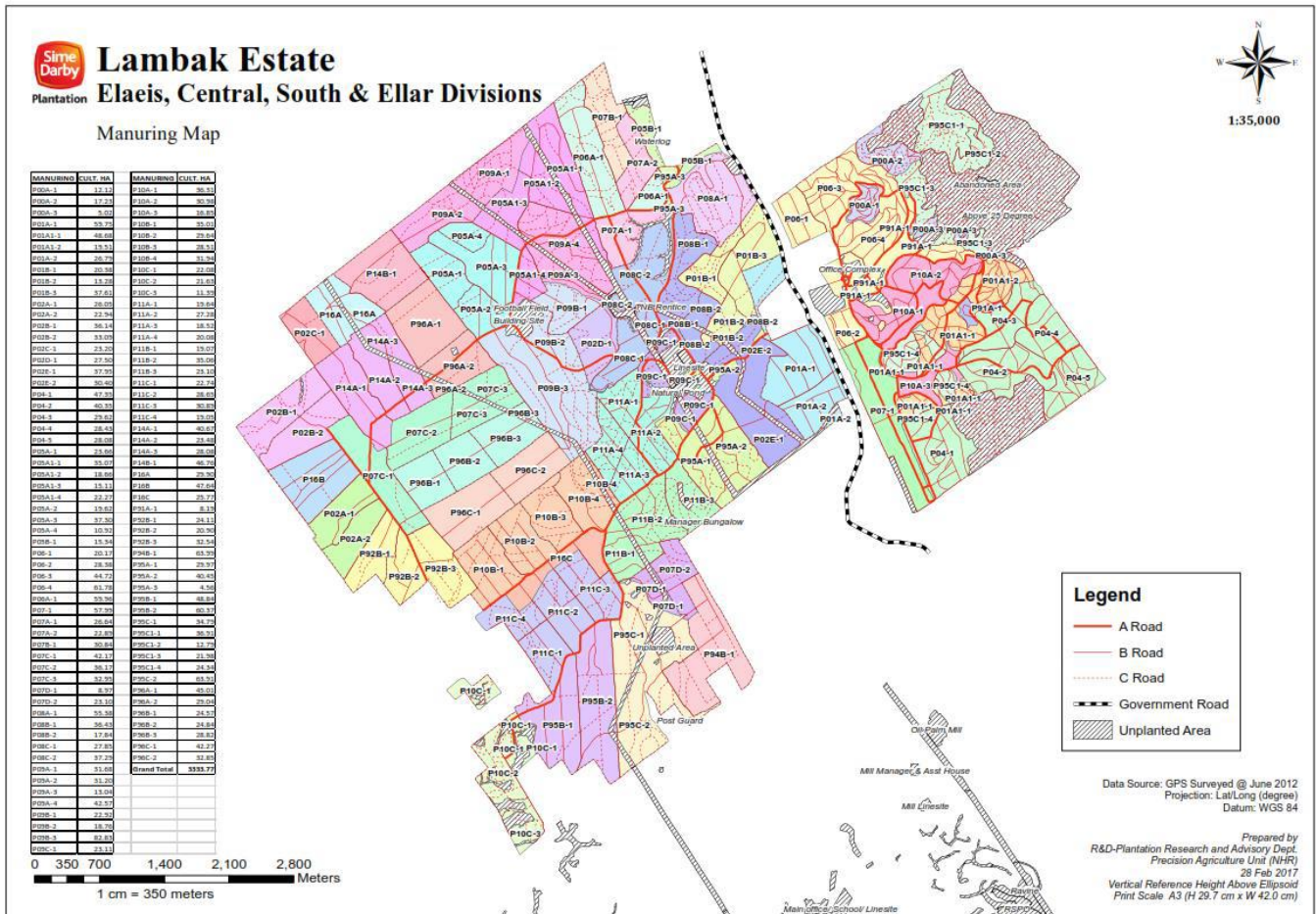
Appendix F: Location Map of Bukit Benut Palm Oil Mill and Supply bases



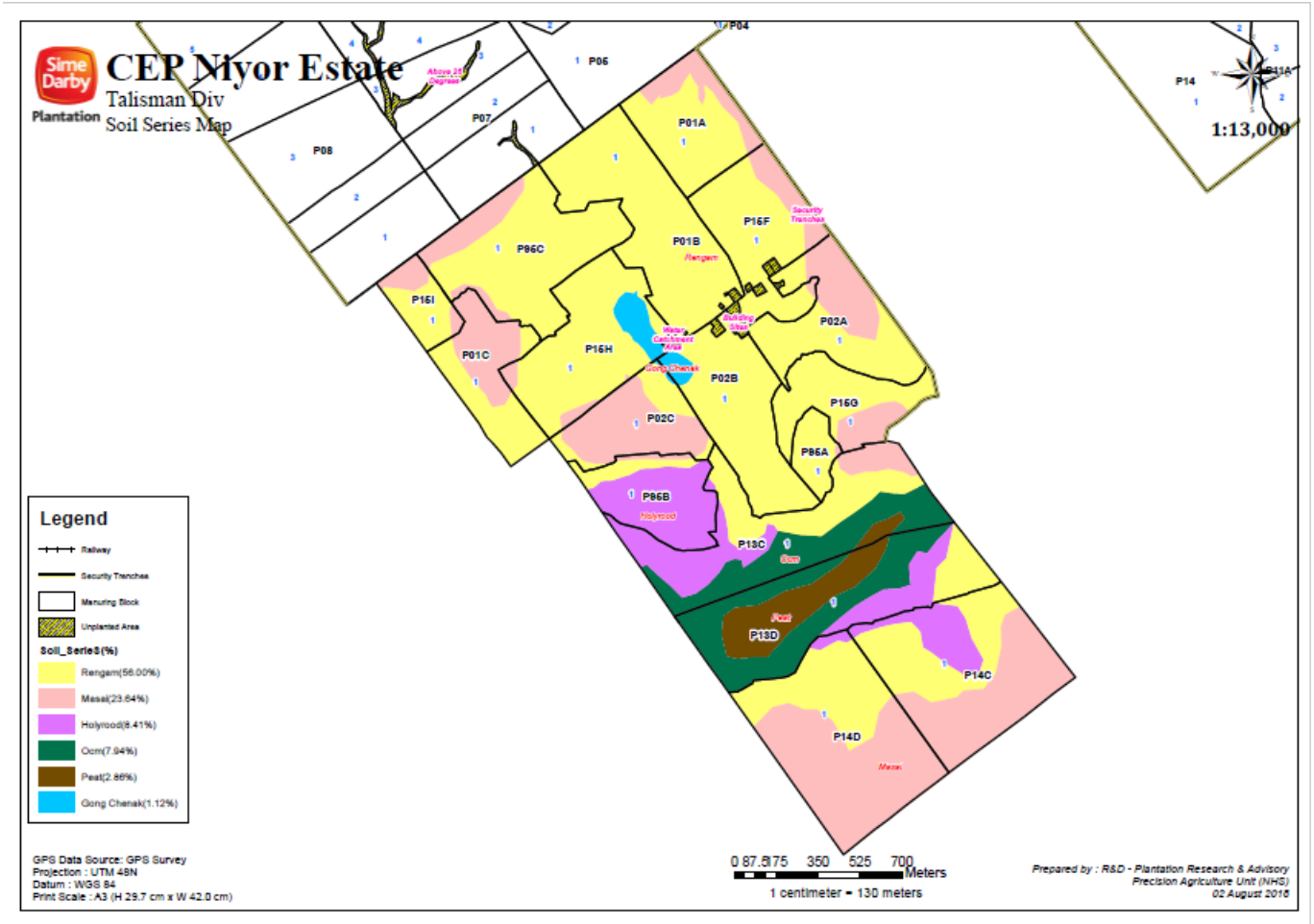
Appendix G: Bukit Benut Estate Field Map



Appendix H: Lambak Estate Field Map



Appendix I: CEP Nyior Estate Field Map



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

Appendix L: List of Abbreviations

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