

**MSPO Public Summary Report**  
**Revision 2 (Nov 2021)****MALAYSIAN SUSTAINABLE PALM OIL**  
**MSPO OPMC Public Summary Report**

- ☐ Initial Assessment
- ☒ Annual Surveillance Assessment (1\_2)
- ☐ Recertification Assessment (Choose an item.)
- ☐ Extension of Scope

<b>SD GUTHRIE BERHAD</b> <b>(Formerly Known as Sime Darby Plantation Berhad)</b>
Client Company (HQ) Address: Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 Ara Damansara, 47301, Petaling Jaya, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 4) Flemington Palm Oil Mill & Plantations: Flemington Estate, Bagan Datoh Estate, Sabak Bernam Estate, and Sungai Samak Estate
Date of Final Report: 11/11/2024

**Report prepared by:**  
**Mohamed Hidhir Bin Zainal Abidin** (Lead Auditor)

**Report Number: 3984754**

**Assessment Conducted by:**  
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## Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
<b>Company Name</b>	SD Guthrie Berhad (Formerly Known as Sime Darby Plantation Berhad)		
<b>Mill/Estate</b>	<b>Certification Unit</b>	<b>MPOB License No.</b>	<b>Expiry Date</b>
	Flemington POM	529874004000	31/05/2025
	Flemington Estate	525193002000	30/11/2024
	Bagan Datoh Estate	525521002000	31/12/2024
	Sabak Bernam Estate	545859002000	31/01/2025
	Sungai Samak Estate	526340002000	31/01/2025
<b>Address</b>	Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301, Petaling Jaya, Selangor, Malaysia		
<b>Management Representative</b>	Mdm. Shylaja Devi Vasudevan Nair (Head Sustainability Compliance Unit, Group Sustainability Department (GSD))		
<b>Website</b>	www.simedarbyplantation.com	<b>E-mail</b>	shylaja.vasudevan@simedarbplantation.com
<b>Telephone</b>	+(603) 78484000 (Head office)	<b>Facsimile</b>	03-7848 4356 (Head office)

1.2 Certification Information			
<b>Certificate Number</b>	Mill: MSPO 682042 Estate: MSPO 690017	<b>Certificate Start Date</b>	9/02/2023
<b>Date of First Certification</b>	9/02/2018	<b>Certificate Expiry Date</b>	8/02/2028
<b>Scope of Certification</b>	<input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits		
<b>Visit Objectives</b>	The objective of the assessment was to conduct an annual surveillance assessment 1_2 of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system.		
<b>Standard</b>	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		
<b>Recertification audit 1 (RAV)</b>	15-18/08/2022		
<b>Continuous Assessment Visit Date (CAV) 1_1</b>	07-10/08/2023		
<b>Continuous Assessment Visit Date (CAV) 1_2</b>	12-15/08/2024		
<b>Continuous Assessment Visit Date (CAV) 1_3</b>	-		
<b>Continuous Assessment Visit Date (CAV) 1_4</b>	-		

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#### 1.3 Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 590802	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn Bhd	4/10/2026
MSPO 714138	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018	BSI Services Malaysia Sdn Bhd	17/09/2029

#### 1.4 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Flemington POM	Lot 5138, Jalan Sg Dulang, Sungai Sumun, 36309 Teluk Intan, Perak, Malaysia	3° 55' 42.30" N	100° 51' 23.70" E
Flemington Estate	Lot 4541, Jalan Simpang Empat - Bagan Datuk, 36309 Teluk Intan, Perak, Malaysia	3° 53' 26.50" N	100° 52' 53.30" E
Bagan Datoh Estate	Lot 3710, Bagan Datuk, 36100 Perak, Malaysia	3° 59' 33.80" N	100° 47' 24.90" E
Sabak Bernam Estate	Lot 4672, Ulu Bernam, 36500 Perak, Malaysia	3° 45' 33.77" N	101° 00' 25.12" E
Sungai Samak Estate	Lot 2094, Jalan Haji Suhaimi, 45307 Sabak Bernam, Selangor, Malaysia	3° 44' 57.30" N	101° 08' 51.90" E

#### 1.5 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Flemington Estate	1,619.34	7.38	205.65	1,832.37	88.37
Bagan Datoh Estate	3,574.83	2.00	253.73	3,830.56	93.32
Sabak Bernam Estate	2,344.36	1.24	166.19	2,511.79	93.33
Sungai Samak Estate	2,766.43	7.81	251.5	3,025.74	91.43
<b>Total (ha)</b>	<b>10,304.96</b>	<b>18.43</b>	<b>877.07</b>	<b>11,200.46</b>	

#### 1.6 Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		

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Flemington Estate	0	1,166.84	348.30	104.20	0	1,619.34	0
Bagan Datoh Estate	0	2,314.46	956.41	303.96	0	3,574.83	0
Sabak Bernam Estate	0	2,131.03	214.44	0	0	2,345.47	0
Sungai Samak Estate	0	921.29	1,176.12	552.45	0	2,649.86	0
<b>Total (ha)</b>	<b>0</b>	<b>6,533.62</b>	<b>2,695.27</b>	<b>960.61</b>	<b>0</b>	<b>10,189.50</b>	<b>0</b>

### 1.7 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Feb 24 - Jan 25)	Actual (Aug 23 - July 24)	Forecast (Feb 25 - Jan 26)
Flemington Estate	38,170.35	31,628.23	37,382.00
Bagan Datoh Estate	81,941.72	69,233.44	80,781.63
Sabak Bernam Estate	40,810.11	45,202.89	55,218.45
Sungai Samak Estate	57,665.93	59,949.87	62,555.00
<b>Total</b>	<b>218,588.11</b>	<b>206,014.43</b>	<b>235,937.08</b>

### 1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Feb 24 - Jan 25)	Actual (Aug 23 - July 24)	Forecast (Feb 25 - Jan 26)
Nil	N/A	N/A	N/A
<b>Total</b>	<b>N/ A</b>	<b>N/A</b>	<b>N/A</b>

Notes: No-non MSPO certified FFB received.

### 1.9 Certified Tonnage

<b>Mill Capacity: 60 MT/hr</b>  <b>SCC Model: SG</b>	Estimated (Feb 24 - Jan 25)	Actual (Aug 23 - July 24)	Forecast (Feb 25 - Jan 26)
	FFB	FFB	FFB
	235,937.08	206,014.43	218,794.79
	CPO (OER: 20.59%)	CPO (OER: 18.97%)	CPO (OER:20.31%)
	48,579.45	39,074.29	44,437.22
	PK (KER: 4.85%)	PK (KER:4.5%)	PK (KER:4.8%)
	11,442.95	9,275.47	10,502.15

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<b>1.10 Actual Sold Volume (CPO)</b>					
<b>CPO (mt)</b>	<b>MSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSPO</b>		
39,074.29	0	0	11,560.23	25,501.01	<b>37,061.24</b>

<b>1.11 Actual Sold Volume (PK)</b>					
<b>PK (mt)</b>	<b>MSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSPO</b>		
9,275.47	0	0	7,137.79	2,017.58	<b>9,155,37</b>

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## Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

### Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 12-15/08/2024. The audit programme is included as Section 2.4. The approach to the audit was to treat as a MSPO Certification Unit (Flemington POM, Flemington Estate, Bagan Datoh Estate, Sg Samak Estate and Sabak Bernam Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 and MS 2530-4:2013 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 Certification Unit not using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

The estates or smallholders sample were determined based on formula  $S = r\sqrt{n}$  where  $n$  is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders was based on the formula  $(r\sqrt{n})$ ; where  $r$  is the risk factor (may defers 1, 1.5 and 2 depending on risk), where  $n$  is total number of group members (include calculation of sampling taken). The sampled smallholder listed in Appendix B.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSPO 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 3.6.

This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

All the previous nonconformities are remains closed. The assessment findings from the reassessment are detailed in Section 4.2.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification and recertification decision by BSI. For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Re-Certification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Flemington POM	√	√	√	√	√
Flemington Estate	-	√	√	-	√
Bagan Datoh Estate	-	√	-	√	√
Sabak Bernam Estate	√	-	√	-	-
Sg Samak Estate	√	-	-	√	-

**Tentative Date of Next Visit: August 11, 2025 - August 14, 2025**

**Total No. of Mandays: 11-man days**

## 2.1 BSI Assessment Team

Team Member Name	Role (Team Leader or Team member)	Qualifications (Short description of the team members)
Mohamed Hidhir Zainal Abidin (MHZ)	Team Leader	<p><b>Education:</b> Bachelor's Degree in Chemical Engineering, National University of Malaysia</p> <p><b>Work Experience:</b> 1) 7 years working experience in palm oil industry specifically on palm oil milling for 5 years 2) Auditor for several standards including ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO since 2012</p> <p><b>Training attended:</b> 1) ISO 9001 Lead Auditor Course 2) ISO 14001 Lead Auditor Course 3) OHSAS 18001 Lead Auditor Course in 2012 4) Endorsed RSPO P&amp;C Lead Auditor Course in 2013 5) MSPO Awareness Training in 2014 6) Endorsed RSPO SCCS Lead Auditor Course 7) SMETA Auditor training</p> <p><b>Aspect covered in this audit:</b>  <input checked="" type="checkbox"/> Good Agriculture Practice           <input type="checkbox"/> Health and Safety           <input type="checkbox"/> Social           <input checked="" type="checkbox"/> Environmental         </p>



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		<b>Language proficiency:</b> English and Bahasa Malaysia
Ahzahar Amir (ABA)	Team Member	<b>Education:</b> He holds a Bachelor of Science Bio-industry (Hons) from University Putra of Malaysia and Diploma in Planting Industry Management from MARA Institute of Technology.  <b>Work Experience:</b> He started his career in oil palm industry as Trainee Manager at FELCRA Berhad in 1983 and pursued his career with Malaysian Palm Oil Board (MPOB) for 22 over years before joining Tradewinds Plantation Berhad for 10 years as an Estate Manager prior to retirement in year 2016. All together he has more than 32 over years of experience in oil palm industry. Has been with MSPO certification since year 2017 as freelance Auditor/Lead Auditor with various certification bodies.  <b>Training attended:</b> He has successfully obtained competency of Lead Auditor courses for the followings: 1) Malaysian Sustainable Palm Oil - MSPO 2530:2013 2) MSPO Certification Scheme Document - MS 2530:2022 3) IRCA Certified Quality Management System (ISO 9001:2015) 4) Exemplar Global Certified Integrated Management System (IMS) (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018) 5) He has also obtained ISO 370001:2016 Lead Auditor competency certificate in year 2020 conducted by SIRIM QAS International 6) Successfully attended Legal requirements Complementing to MS ISO 37001:2016 Anti Bribery Management Systems (ABMS) – For Certification Body Siri 1/2021 conducted by Akademi Pencegahan Rasuah Malaysia (MACA).  <b>Aspect covered in this audit:</b> <input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Social <input type="checkbox"/> Environmental  <b>Language proficiency:</b> English and Bahasa Malaysia
Farrah Sahanim Binti Paduka (FSP)	Team Member	<b>Education:</b> Graduated in Bachelor of Science Forestry With Honours (Nature Park and Recreation) at University Malaysia Sabah.  <b>Work Experience:</b> Experience in auditing in palm oil industry with more than 4 years. Experience in consulting, internal auditor and Training Management for various program such as MSPO, ISCC and ISO.  <b>Training attended:</b> Has undergone training of Integrated Management System (IMS) ISO 9001:2015 and ISO 14001:2015 Lead Auditor Training, Malaysian Sustainable Palm Oil MS2530:2013 Lead Auditor Course, CQI & IRCA Certified ISO 9001:2015 and ISO 45001:2018, RSPO P&C and SA 8000.

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		<b>Aspect covered in this audit:</b> <input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <b>Language proficiency:</b> English and Bahasa Malaysia
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## 2.2 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

## 2.3 Accompanying Persons

No.	Name	Role
	Nil	

## 2.4 Assessment Plan

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

Date	Time	Subjects	MHZ	FSP	ABA
Sunday 11/08/2024	PM	Audit team travel to Teluk Intan. Check in at Rivertel Hotel, Teluk Intan	✓	✓	✓
Monday 12/08/2024  <b>Flemington POM/ Estate</b>	0730	Travel to Flemington POM	✓	✓	✓
	0830 - 0930	Opening Meeting: • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan	✓	✓	✓
	0930 - 1300	Travel to Flemington Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, landfill, etc.	✓	✓	✓
	1000 - 1230	Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	-	✓	-
	1300 - 1400	Lunch break	✓	✓	✓

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	1400 - 1630	Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting (if any)	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Tuesday 13/08/2024  <b>Sabak Bernam Estate</b>	0730	Travel to Sabak Bernam Estate	√	√	√
	0830 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1000 - 1300	Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	-	√	-
	1300 - 1400	Lunch break	√	√	√
	1400 - 1630	Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting (if any)	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Wednesday 14/08/2024  <b>Flemington POM</b>	0730	Travel to Flemington POM	√	√	√
	0830 - 1000	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment.  Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.			
	1000 - 1230	Meeting with stakeholders (Government, village rep, smallholders, workers representative,	-	√	-

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Date	Time	Subjects	MHZ	FSP	ABA
		contractor etc.).			
	1230 - 1330	Lunch break	✓	✓	✓
	1330 - 1630	Continue with document review (MSPO part 4), P1: Management commitment and responsibility, P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition. P5: Environment, natural resources, biodiversity and ecosystem services P4: Social responsibility, health safety and employment condition, P6: Best practices	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Thursday 15/08/2024  <b>Flemington POM</b>	0730	Travel to Flemington POM	✓	✓	✓
	0830 - 1300	Continue with unfinished elements from day 1 & 2			
	1300 - 1400	Lunch break	✓	✓	✓
	1400 - 1530	Continue with pre-lunch activity	✓	✓	✓
	1530 - 1600	Audit team discussion	✓	✓	✓
	1600 - 1700	Closing meeting: conclusion and recommendation	✓	✓	✓
Friday 16/8/2024	AM	Audit team travel back to KL	-	✓	✓

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## Section 3: Assessment Findings

### 3.1 Details of audit results

This assessment has been assessed using the following MSPO normative requirements. The assessment details are provided in Appendix A.

- ☐ MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- ☒ MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- ☒ MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

### 3.2 Details of Nonconformities and Opportunity for improvement

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

During the assessment there were zero (0) Major & one (1) Minor nonconformities and one (1) OFI raised. The SOU 4 Flemington Palm Oil Mill and Supply Bases 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 below is the summary of the non-conformity raised during this assessment.

Non-Conformity Report			
<b>NCR Ref #:</b>	2405601-202310-N1	<b>Issue Date:</b>	15/08/2024
<b>Due Date:</b>	Next surveillance	<b>Date of Closure:</b>	Open
<b>Area/Process:</b>	Flemington POM	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 4: 4.3.1.3 Minor
<b>Requirements:</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.		
<b>Statement of Nonconformity:</b>	Legal register was not updated effectively when there are any new amendments or any new regulations coming into force.		
<b>Objective Evidence:</b>	Legal & Other requirement register (LORR) dated June 2024 has not included the new Environment Quality Act (amendment) 2024 which effective from 7/7/2024.		
<b>Corrections:</b>	GSD has already communicated with Operating Units in Upstream Malaysia on the updated LORR with the new Environment Quality Act (amendment) 2024 on 21/8/2024.		
<b>Root cause analysis:</b>	Legal & Other requirement register (LORR) is updated by Group Sustainability Department (GSD). The communication flow from other departments to GSD on legal updates is not very clear. Hence, new updates may take some time to be included in the register.		
<b>Corrective Actions:</b>	GSD to identify Acts applicable to Upstream Malaysia to the respective departments in HQ and to liaise with departments PIC periodically to ensure any legal updates are included in LORR and communicated to all Operating Units in Upstream Malaysia.		

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<b>Assessment Conclusion:</b>	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.
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Opportunity For Improvement			
<b>Ref:</b>	2534870-202408-I1	<b>Clause:</b>	MSPO 2530 Part 4: 4.4.5.3
<b>Area/Process:</b>	Flemington POM		
<b>Objective Evidence:</b>	The mill management may improve on the communication towards the foreign workers regarding the latest requirement of SOCSO contribution.		

Noteworthy Positive Comments	
1	Good cooperation given by the management and GSD team.
2	No negative comments raised by stakeholders during consultation session.
3	Good estate and mill management practices demonstrated during audit.

### 3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
<b>NCR Ref #:</b>	2377805-202308-N1	<b>Issue Date:</b>	10/08/2023
<b>Due Date:</b>	Next Assessment	<b>Date of Closure:</b>	15/08/2024
<b>Area/Process:</b>	Flemington POM	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 4: 4.6.1.1 Minor
<b>Requirements:</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.		
<b>Statement of Nonconformity:</b>	The mechanism of implementation of procedure is inadequately executed.		
<b>Objective Evidence:</b>	<p>During site visit at Flemington POM, the Shovel at Boiler area was inspected and found the reverse sensor was not functioned. Further interview verification confirmed that the Old Shovel was a standby unit and just use for 3 days (The existing Rental Shovel was under repaired). Refer records "Penyelenggaraan Mingguan &amp; Bulanan" Shovel Checklist month of August 2023, the checklist does not have checklist related reverse sensor. Refer to Occupational Safety And Health Procedure with Document No: SD/SDP/PSQM(ESH)/210/S17 dated 01/07/2012 Section 7.1.3.3 Preventive control ", 8.8.3 During Use: (a) All Transportation system/ vehicles and machineries, either owned by SDP or not, shall be operated safely according to the SOP.</p> <p>Other than that, it was verified that one of the contractors VXXX RXXX have conducted maintenance job at Boiler annual Inspection with PTW dated 13/03/2023. Stated gas testing checking in the checklist has been conducted. However, on PTW before commencing of work dated 02/03/2023 and 03/03/2023, (Cleaning activities and preparation for work by contractor) there is no evidence that gas testing inspection has been conducted as per General Checklist does not have checklist on that matter. It was not in line with Procedure Permit to Work Procedure (PTW) UM/HSE dated 10/04/2023 Section 5.8.</p>		

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<b>Corrections:</b>	<p>a) The reverse censor has been installed and the shovel operate as usual. Also mill has corrected the daily inspection checklist by include all the aspect as recommended in the machinery SOP.</p> <p>b) Mill already have a competent person (assistant manager) for AGT and will comply PTW for gas testing.</p>
<b>Root cause analysis:</b>	<p>a) Shovel which in operation was just used temporarily and still in rectification process as the existing rental shovel under repair. The checklist has been created by own/independently without reference to any guidance and does not cover all relevant aspects for Shovel operation. Also, the checklist is only checked once a month by the employer for action if needed.</p> <p>b) Poor monitoring especially if issuing PTW for any risky activities. Also, there is no AGT during inspection cleaning activities done at mill since there is no competent person at mill.</p>
<b>Corrective Actions:</b>	<p>a) Mill has corrected the daily inspection checklist by include all the aspect as recommended in the machinery SOP. Briefing on new checklist will be provide to the drivers and if any faulty will notify immediately to the management for rectification. The Checklist will be check on weekly basis by the management.</p> <p>b) Training on PTW will provide to all the PIC by Mill management and RSQM. Mill will ensure to comply and check if issuing PTW for any risky activities. If needed mill will request AGT personal from sister mill to ensure and fulfil the requirements of PTW.</p>
<b>Assessment Conclusion:</b>	CAP has been accepted and evidence of CAP effectiveness to be verified in the next assessment.
<b>Verification Statement:</b>	<p>Mill management has established Shovel Checklist 2024 weekly and monthly inspection</p> <ul style="list-style-type: none"> <li>- Latest daily inspection verified 1 August – 12 August 2024</li> <li>- Item 10 – Lampu “Reverse” dan buzzer - Good</li> </ul> <p>The management has complied to the Permit to Work Procedure (PTW) UM/HSE dated 10/04/2023 Section 5.8.</p> <p>Verified En Mohd Pahmie bin Ibrahim, Mill Senior Assistant Manager has passed and awarded with Penguji Gas Bertauliah dan Penyelia Kemasukan Bagi Ruang Terkurung dated 21/06/2023.</p> <p>No recurrence of issue observed hence, the previous major NC is remained closed.</p>

Opportunity For Improvement			
<b>Ref:</b>	Nil	<b>Clause:</b>	MSPO Part __: N/A
<b>Area/Process:</b>	N/A		
<b>Objective Evidence:</b>	N/A		
<b>Verification Statement:</b>	N/A		

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### 3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
2237838-202208-M1	4.4.4.2 Part 3: Major	18/08/2022	Closed on 13/10/2022
2237838-202208-N1	4.4.5.11 Part 3: Minor	18/08/2022	Closed on 10/08/2023
2237838-202208-N2	4.5.1.2 Part 4: Minor	18/08/2022	Closed on 10/08/2023
2237838-202208-N3	4.5.4.1 Part 4: Minor	18/08/2022	Closed on 10/08/2023
2377805-202308-N1	4.6.1.1 Part 4: Minor	10/08/2023	Closed on 15/08/2024
2534870-202408-N1	4.3.1.3 Part 4: Minor	15/08/2024	Open

### 3.5 Issues Raised by Stakeholders

IS #	Description
1	<p><b>Feedbacks: Teacher (SJK (T) Ladang Flemington, SJK (T) Ladang New Coconut)</b></p> <p>According to teachers, there are around 20 students from the estate and the mill at the school and the estate has a good relationship where the estate has contributed the manpower and allowing the school for <i>merentas desa</i> activity. He also stated that they also had the Ziarah Cakna Program where the teachers will be visiting the student at the student's house if there is long period of absence of students or any concern raised. There is no estate's activity that affecting the school.</p> <p><b>Management Responses:</b> Will keep maintaining the good practise and will improve further in giving support to all stakeholders.</p> <p><b>Audit Team Findings:</b> No further issue.</p>
2	<p><b>Feedbacks: Head of Village (Sungai Dulang)</b></p> <p>The head of village has been appointed for eight months now. Feedback from the head of village, there is no land dispute received from the head of village during the consultation as there is clearly boundary which is the main road and there is no pollution occur or open burning was sighted from the estate activity. He also attended the stakeholder meeting that organised by the estate. There are around more than five villager were working in the estate Verify there is no issues such as the estate's workers bothering the villager has been raised.</p> <p><b>Management Responses:</b> Will keep maintaining the good practise and will improve further in giving support to all stakeholders.</p> <p><b>Audit Team Findings:</b> No further issue.</p>
3	<p><b>Issue: Gender Committee Representative, worker representative, NUPW representative</b></p> <p>During the stakeholder meeting, it was informed by the representative that there is no harassment has happened in the estate premise. Any issues or complaint received will be discuss in gender committee meeting without prejudice. Regular meetings between the estate management and NUPW committee are conducted to address any matter arising from the workers. Worker's welfare including housing, salary payment and benefit are well taken care of by the estate management.</p>



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	<b>Management Responses:</b> Will keep the good practise, all workers are asset to the company, and they will be taken care.
	<b>Audit Team Findings:</b> No further issue.
4	<b>Feedbacks: Contractor (Fxxx Txxxxxxxxx)</b> Interview with the representative, the estate management and the contractor have a very good relationship between both parties. According to the contractor, he has providing services at the estate and mill for more than 20 years now. The contractor was given PTW (permit to work) every week before starting their works at the estate or the mill. The estate has also given safety briefing to the contractor before starting their services in the estate. The contractor has also provided PPE. All of his workers are locals where monitoring of their license and permits were made by the estate every month to ensure their validity.
	<b>Management Responses:</b> No further issue.
	<b>Audit Team Findings:</b> No further issue.

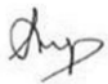

### 3.6 List of Stakeholders Contacted

<b>Government Officer:</b> 1. SJK (T) Ladang New Coconut 2. SJK (T) Ladang Flemington	<b>Community/neighbouring village:</b> 1. Head of Village Kawasan Bagan Datok 2. Head of Village Sungai Dulang
<b>Suppliers/Contractors/Vendors:</b> 1. Fxxx Txxxxxxxxx 2. Axxxx Mxxxx Axxxxxxx 3. Dxxx Mxxxx Exxxxxxxxx	<b>Worker's Representative/Gender Committee:</b> 1. NUPW representative 2. Workers representative 3. Gender committee

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#### Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment SOU 4 Flemington POM Certification Unit complies with the MS 2530-2:2013 or MS 2530-3:2013 or MS 2530-4:2013. It is recommended that the certification of SOU 4 Flemington POM Certification Unit is continued.	
Acknowledgement of Assessment Findings	Report Prepared by
<b>Name:</b> <b>Shylaja Devi Vasudevan Nair</b>	<b>Name:</b> <b>Mohamed Hidhir Bin Zainal Abidin</b>
<b>Company name:</b> <b>SD Guthrie Berhad</b>	<b>Company name:</b> <b>BSI Services Malaysia Sdn Bhd</b>
<b>Title:</b> <b>Head, Sustainability Compliance Unit</b>	<b>Title:</b> <b>Lead auditor</b>
<b>Signature:</b> 	<b>Signature:</b> 
<b>Date: 18/10/2024</b>	<b>Date: 19/09/2024</b>

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**Appendix A: Summary of the findings by Principles and Criteria**

**MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Oil Palm Plantations and Organized Smallholders**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. - <b>Major compliance</b> -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established the policy "Group Sustainability & Quality Policy Statement" signed by the Group Managing Director (Mohamad Helmy Othman Basha), dated 02/12/2019. The implementation of MSPO has been incorporated in the policy. For example, at Flemington Estate, the latest policy briefing was carried on 6/02/2024.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. - <b>Major compliance</b> -	Sime Darby Plantation Berhad has established the policy "Group Sustainability & Quality Policy Statement" signed by the Group Managing Director (Mohamad Helmy Othman Basha), dated 02/12/2019. The policy covers commitment to: - Promoting good governance and transparency - Contributing to a better society - Minimizing environmental harm - Delivering sustainability quality The policy is guided by three main documents i.e.: - Responsible Agriculture Charter - Human Rights Charter	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Internal audit process defined under Internal Audit Procedure, SDP/GSD/SCU/IAP, rev:4 dated April 2024. Under section 6.1.1: Pre-audit activities – Audit planning and scheduling by lead auditor taking into consideration the number of operating units involved, review of previous audit performance and availability of auditor. As practiced, annual internal audit carried out to identify strong and weak points and potential area for further improvement.	Complied
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. <b>- Major compliance -</b>	Guided by Internal audit procedure, SDP/GSD/SCU/IAP, rev:4 dated April 2024, audit results documented under Sustainability Certification Online Tracing System (SCOTS) and audit checklist which has included the summary of findings and process to identify root cause and corrective action plan. For example at Sabak Bernam Estate, internal audit was carried out on 29/5/2024. Total of 4 NC raised with 3 (fully closed on 6/8/24) and 1 conditionally closed on 8/8/2024.	Complied
<b>4.1.2.3</b>	Report shall be made available to the management for their review. <b>- Major compliance -</b>	Internal audit report/SCOTS was made available for management review as reported under indicator 4.1.2.1	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. <b>- Major compliance -</b>	The management conducted a review meeting after the completion of the internal audit. The purpose was to assess the ongoing suitability, adequacy, and effectiveness of the requirements for the effective implementation of MSPO and to identify areas for improvement. At Sabak Bernam Estate, latest management review was carried out on 6/6/2024.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - <b>Major compliance</b> -	Continual improvement Plans (CIP) has been established. The elements of social, environmental, safety, health, and operational aspects included in the plan demonstrates a proactive approach to responsible and sustainable business practices with allocation of budget for CAPEX/OPEX at respective estates. At Sabak Bernam Estate for example 6 units of new quarters included in the CAPEX with upgrading of tarmac road.	Complied
<b>4.1.4.2</b>	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - <b>Major compliance</b> -	System to improve practice in line with new information and techniques were carried out by the estate management through various programs as documented in the annual training program. The management on receiving this information is responsible to disseminate to all employees.	Complied
<b>4.1.4.3</b>	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - <b>Major compliance</b> -	The estate managements respectively established annual training program based on the training needs analysis for the purpose of improving the competency of their employees and to disseminating. Information. Any new update or information, if related and endorsed by the top management, shall be disseminated to the employees through the training program.	Complied
<b>4.2 Principle 2: Transparency</b>			
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>			
<b>4.2.1.1</b>	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or	The management have established a document regarding to Communication to Internal and External Stakeholder under Sustainability Plantation Management System (SPMS) under Appendix	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	disclosure that could result in negative environmental or social outcomes. <b>- Major compliance -</b>	5 Flowchart and Procedure on handling social issues dated 01/11/2008. This document has elaborated the standard procedure under Estate Quality Management System (EQMS); Standard Operation Manual (SOM) under Sub section 5.5 procedure for internal and external communication dated 1/11/2008 for estate.  Any requested information by relevant stakeholders will be discuss and communicate during stakeholder meeting. Stakeholder meeting was conducted for all estates is such as follow: Flemington Estate: 07/05/2024 Sabak Bernam Estate: 13/05/2024	
<b>4.2.1.2</b>	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. <b>- Major compliance -</b>	Management documents related to sustainability available at each operating units visited during the on-site audit upon request including sustainability policies, procedures, social and environmental assessments as well as management action plans etc. Other than that, global documents accessible via company's website.	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders. <b>- Major compliance -</b>	The management have established a document regarding to Communication to Internal and External Stakeholder under Sustainability Plantation Management System (SPMS) under Appendix 5 Flowchart and Procedure on handling social issues dated 01/11/2008. This document has elaborated the standard procedure under Estate Quality Management System (EQMS); Standard Operation Manual (SOM) under Sub section 5.5 procedure for internal and external communication dated 1/11/2008 for estate.	Complied
<b>4.2.2.2</b>	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.	<u>Flemington Estate</u>	Complied

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Criterion / Indicator		Assessment Findings	Compliance						
	- Minor compliance -	<p>At each operational unit, management has appointed the Manager in charge responsible for addressing social issues. The appointment is the estate manager, as specified in the appointment letter and was verify by Chief Executive Officer Northern Region on 01/01/2023.</p> <p><u>Sabak Bernam Estate</u></p> <p>At each operational unit, management has appointed the Manager in charge responsible for addressing social issues. The appointment is the estate manager, as specified in the appointment letter and was verify by Chief Executive Officer Northern Region on 01/06/2023.</p>							
4.2.2.3	<p>List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.</p> <p>- Major compliance -</p>	<p>The visited estates have established a Stakeholders list, documented in the Stakeholders List FY 2024. Stakeholders were categorized into Contractors, Vendors/Suppliers, Local Community, and Other Interested Parties (including Government Agencies, Schools, Hospitals, Police Stations, OCP, etc.). Consultation and communication took place through written reports and meetings.</p> <p>Any communication, requests, or grievances from external stakeholders were recorded in the visit logbook, stakeholders' minutes meetings, the Suara Kami Platform, and the Whistleblowing Channel.</p> <p>Any issue raised during the stakeholder meeting and verified during stakeholder consultation were included at the Management Plan on Social Impact Assessment, updated 20/05/2024 (Flemington Estate) and 27/05/2024 (Sabak Bernam Estate) respectively with on-going and continuous status.</p> <p>Stakeholder meeting conducted is such as follow:</p> <table><tr><td>Estate</td><td>Date</td></tr><tr><td>Flemington</td><td>07/05/2024</td></tr><tr><td>Sabak Bernam</td><td>13/05/2024</td></tr></table>	Estate	Date	Flemington	07/05/2024	Sabak Bernam	13/05/2024	Complied
Estate	Date								
Flemington	07/05/2024								
Sabak Bernam	13/05/2024								

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Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). <b>- Major compliance -</b>	Sime Darby Plantation Berhad has established SOP for traceability and documented in Sime Darby Plantation, Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 02, January 2024. Refer document no. SDP/GSD/SCCS/202401/SCCS. The objective of the procedure is to provide guideline for mill to establish and ensure effective implementation on sustainable supply chain and traceability of certified sustainable materials for both standards (RSPO & MSPO): Fresh Fruit Bunch (FFB), Crude Palm Oil (CPO) and Palm Kernel (PK)	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	Daily inspections were conducted to ensure compliance with the traceability system. The weighbridge operator diligently entered all pertinent data into the system, which was subsequently verified by the executive at the close of each day. This verification process included a thorough review of the weighbridge records and Fresh Fruit Bunch (FFB) delivery from estate to the mill. Details information traceability of Fresh Fruit Bunch (FFB): Own supplier under SOU4 a) The name and address of the seller/buyer - Sabak Bernam Estate b) Product(s) identification including the applicable supply chain models (mass balance, segregation) - CS FFB c) The quantity of the products delivered - nett weight: 11.29 mt d) The loading or delivery date – 31/07/2024 e) Related transportation documentation with a unique identification number – weighbridge ticket no.:28752 f) MSPO certificate number – MSPO 690017 g) MSPO certificate validity – 9/02/2023 – 8/02/2028	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		<p>a) The name and address of the seller/buyer – Bagan Datoh Estate</p> <p>b) Product(s) identification including the applicable supply chain models (mass balance, segregation) - CS FFB</p> <p>c) The quantity of the products delivered - nett weight: 8.29 mt</p> <p>d) The loading or delivery date – 31/07/2024</p> <p>e) Related transportation documentation with a unique identification number – weighbridge ticket no.: 108679</p> <p>f) MSPO certificate number – MSPO 690017</p> <p>g) MSPO certificate validity – 9/02/2023 – 8/02/2028</p> <p>Diversion from other certified management unit</p> <p>a) The name and address of the seller/buyer – Sogomana Estate (other MSPO certified group estate, SOU5)</p> <p>b) Product(s) identification including the applicable supply chain models (mass balance, segregation) – CS FFB</p> <p>c) The quantity of the products delivered – nett weight: 9.71 mt</p> <p>d) The loading or delivery date – 22/07/2024</p> <p>e) Related transportation documentation with a unique identification number – weighbridge ticket no.: 21602</p> <p>f) MSPO certificate number – MSPO 00135</p> <p>g) MSPO certificate validity – 28/01/2022 – 27/01/2027</p> <p>a) The name and address of the seller/buyer – Sg Buloh Estate (other MSPO certified group estate, SOU6)</p>	

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		b) Product(s) identification including the applicable supply chain models (mass balance, segregation) – CS FFB c) The quantity of the products delivered – nett weight: 39.07 mt d) The loading or delivery date – 6/05/2024 e) Related transportation documentation with a unique identification number – weighbridge ticket no.: 47002 f) MSPO certificate number – MSPO 00131 g) MSPO certificate validity – 21/01/2022 – 22/01/2027	
<b>4.2.3.3</b>	The management should identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	The estate has appointed personnel to be responsible for Supply Chain Certification System as per appointment letter which state the responsible of the PIC as follows: 1. Assisting Assistant on Supply Chain Certification System 2. Other related issues on SCCS At Flemington Estate has appointed the (Senior Assistant Manager) as Person Responsible for SCCS as per Appointment Letter dated 02/01/2023 signed by the Estate Manager.	Complied
<b>4.2.3.4</b>	Records of sales, delivery or transportation of FFB shall be maintained. <b>- Major compliance -</b>	The estates have sent the FFB harvested to the Palm Oil Mill. The estate has maintained the records of FFB dispatch and records of fresh Fruit Bunch (FFB) to the mill as reported under 4.2.3.2	Complied
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	<u>Flemington Estate</u>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<ol style="list-style-type: none"> <li>1. MPOB License no. 525193002000 for selling and moving of FFB under 1,832.37 ha valid from 15/06/2024 until 30/11/2024.</li> <li>2. Diesel and Petrol Permit no KPDNPRKCTIN.600-2/26/84, serial no P: A004168 valid from 30/10/2022 until 29/10/2025, Diesel: 16,000 liter, Petrol: 100 liter</li> <li>3. Weighbridge ticket, calibration no. ATI-ATK 001642, capacity: 30,000 kg indicator: BARKEL(M), stamping date: 29/07/2024 (main division)</li> <li>4. Weighbridge ticket, calibration no. A3-ATK 00524, capacity: 40,000 kg indicator: Avery ZM305, stamping date: 22/09/2023 (Teluk Buloh Division)</li> <li>5. Certificate of fitness for air compressor, PK PMT 83877 valid until 22/01/2025.</li> </ol> <p><u>Sabak Bernam Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB License no. 545859002000 for selling and moving of FFB under 2,647.63 ha valid from 1/02/2024 until 30/01/2025</li> <li>2. Diesel and Petrol Permit no. PBKB/202/P/B-000125 valid from 11/01/2024 until 10/01/2025, Diesel: 15,000 liter</li> <li>3. Salary deduction permit (water and electricity) under Labor Department, ref no.: JTKS(E) 6/115. Jld29-14(2) dated 31/10/2017.</li> <li>4. Weighbridge ticket, calibration no. B4-ATK 00880, capacity: 60,000 kg indicator: Mettler Toledo, stamping date: 3/07/2024</li> <li>5. Certificate of fitness for air compressor, SL-PMT-4704 valid until 11/09/2025.</li> </ol>	

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<b>4.3.1.2</b>	The management shall list all laws applicable to their operations in a legal requirements register. <b>- Major compliance -</b>	Documented Procedures have been established and implemented; refer to Estate Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008. All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Refer to legal register dated 31/07/24 for Sabak Bernam Estate.	Complied
<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. <b>- Major compliance -</b>	Documented procedures have been established and implemented; refer to Estate Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008. All legal requirement was documented in Legal and Other Requirement Register. Compliance to each applicable law and regulation is monitored by the operating unit. The legal register at the estate reviewed/updated on a yearly basis. Sighted the document 'Summary of Compliance' indicating the status of compliance and signed by estate manager. Refer to the latest version dated 31/7/2024 at Flemington Estate.	Complied
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. <b>- Minor compliance -</b>	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. At each respective operating units, assistant manager appointed as Person In Charge (PIC) to monitor compliance and to track and update the changes in regulatory requirements. For example at Sabak Bernam estate, appointment letter of PIC for legal dated 10/01/23 was verified.	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.	Flemington Estate and Sabak Bernam Estate demonstrated with legal ownership or leases with legal documents. Therefore, the estates	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	cultivation activities have not diminished the land use rights of other users. During site verification there is no evidence to show that oil palm cultivation activities had diminished the land use rights of others. No issues of land dispute in all estates within SOU 4 that involved other land user rights since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. Land titles were made available to the audit team. it was found that the land use right stated in the title is match with the operation conducted by the management. Total of 40 grants for the year 2024, with (two (2) grants were sold to third party company (QL Prima Sdn Bhd, Mesra Prima Sdn Bhd and Citra Jernih Sdn Bhd on 2023. Sale and purchase agreement dated 27/07/2024 between Sime Darby Plantation Berhad and the companies was available at Flemington Estate and 7 grants was available at Sabak Bernam Estate respectively. Onsite visit verified there no evidence to show that oil palm cultivation activities had diminished the land use rights of others. Sighted there is the availability of boundary stones and boundary peg (colour with red). Monitoring of boundary was conducted by auxiliary police continuously. The boundary is clearly seen in the boundary map available during audit. Given below are sample boundary stones GPS coordinates as evidence.	
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	<u>Flemington Estate</u> The Estates has the legal documents showing no restrictions on land use and legal ownership of the estates which clearly shows that the land belong to Sime Darby Plantation (Peninsular) Sdn Bhd. Further, under the heading "Rekod Ketuanpunyaan" in the land title it is clearly written that the land belongs to Sime Darby Plantation (Peninsular) Sdn Bhd. Payment voucher of quit rent – FY2023 for 40 lots is available dated 09/05/2024.	Complied

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Criterion / Indicator		Assessment Findings	Compliance																																
		<p>Flemington Estate has 40 Land Titles in total. Given below are some samples land titles as evidence:</p> <table border="1"> <thead> <tr> <th>Title Number</th><th>Lot Number</th><th>Syarat-Syarat Nyata</th><th>Ownership</th></tr> </thead> <tbody> <tr> <td>15XX</td><td>2852</td><td>Oil Palm</td><td>Sime Darby Plantation Sdn Bhd</td></tr> <tr> <td>15 XX</td><td>2847</td><td>Oil Palm</td><td>Sime Darby Plantation Sdn Bhd</td></tr> <tr> <td>15 XX</td><td>2850</td><td>Oil Palm</td><td>Sime Darby Plantation Sdn Bhd</td></tr> </tbody> </table> <p><u>Sabak Bernam Estate</u></p> <p>The Estates has the legal documents showing no restrictions on land use and legal ownership of the estates which clearly shows that the land belong to Sime Darby Plantation (Peninsular) Sdn Bhd. Further, under the heading "Rekod Ketuanpunyaan" in the land title it is clearly written that the land belongs to Sime Darby Plantation (Peninsular) Sdn Bhd. Quit rent dated 25/03/2024 for lot no. 2095 (sample) is available as per audit.</p> <p>Flemington Estate has 7 Land Titles in total. Given below are some samples land titles as evidence:</p> <table border="1"> <thead> <tr> <th>Title Number</th><th>Lot Number</th><th>Syarat-Syarat Nyata</th><th>Ownership</th></tr> </thead> <tbody> <tr> <td>51XXX</td><td>2096</td><td>None</td><td>Sime Darby Plantation Sdn Bhd</td></tr> <tr> <td>47XXX</td><td>4720</td><td>None</td><td>Sime Darby Plantation Sdn Bhd</td></tr> <tr> <td>45XXX</td><td>2095</td><td>None</td><td>Sime Darby Plantation Sdn Bhd</td></tr> </tbody> </table>	Title Number	Lot Number	Syarat-Syarat Nyata	Ownership	15XX	2852	Oil Palm	Sime Darby Plantation Sdn Bhd	15 XX	2847	Oil Palm	Sime Darby Plantation Sdn Bhd	15 XX	2850	Oil Palm	Sime Darby Plantation Sdn Bhd	Title Number	Lot Number	Syarat-Syarat Nyata	Ownership	51XXX	2096	None	Sime Darby Plantation Sdn Bhd	47XXX	4720	None	Sime Darby Plantation Sdn Bhd	45XXX	2095	None	Sime Darby Plantation Sdn Bhd	
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<b>4.3.2.3</b>	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	Flemington Estate and Sabak Bernam Estate have demonstrated legal ownership or leases through appropriate legal documents. The management has maintained the legal perimeter boundary. During the site visit to the estate block, it was verified that boundary markers (red peg) were present along the perimeter boundary. There was no evidence of plantings beyond the perimeter boundary, as verified during the site visit. All the audited units have boundary stones or markers adjacent to neighboring properties, as indicated on the 'Boundary Map' and verified at each site.	Complied
<b>4.3.2.4</b>	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). <b>- Minor compliance -</b>	There was no land dispute at all sampled estates. SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	Not applicable since there is no customary right lands has been identified. Both operating units has been owned by SD Guthrie Berhad (formerly known as Sime Darby Plantations Sdn Bhd) and has been verified based on land title.	Not Applicable
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. <b>- Minor compliance -</b>	Not applicable since there is no customary right lands has been identified. Both operating units has been owned by SD Guthrie Berhad (formerly known as Sime Darby Plantations Sdn Bhd) and has been verified based on land title.	Not Applicable
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.	Not applicable since there is no customary right lands has been identified. Both operating units has been owned by SD Guthrie Berhad	Not Applicable

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	- Major compliance -	(formerly known as Sime Darby Plantations Sdn Bhd) and has been verified based on land title.	
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (Formally known as Sime Darby Plantation Berhad) has conducted the assessment to determined social impact from the Operation Unit and documented in the Social Impact Assessment Report (SIA) Report SOU 4 Flemington dated 27/06/2016 – 01/07/2016. Based on the assessment conducted, the operation unit has established management plan on Social Impact Assessment in the document of Social Action Plan to mitigate negative impact. The plan was updated on annually basis with addition of issues raise during stakeholders meeting, NUPW meetings, stakeholders' complaints and grievances, OPP reports, Social Dialogue, feedbacks from Suara Kami, Whistleblowing and others. Objective of the Social Management Plan is to review social impacts to mitigate negative impacts, ensuring compliance to SOP and legal, to contribute to local development and others.</p> <p>For Flemington estate, the social action plan is available and documented in the document of Management Plan on Social Impact Assessment updated 20/05/2024. The plan includes the objective and action to be taken to achieve the objective.</p> <p>For Sabak Bernam Estate, issue raise during the stakeholder meeting were included in the Social Action Plan document, updated 27/05/2024 with on-going and continuous status.</p>	Complied



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Criterion / Indicator		Assessment Findings	Compliance														
<b>Criterion 4.4.2:</b> Complaints and grievances																	
<b>4.4.2.1</b>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p><b>- Major compliance -</b></p>	<p>SD Guthrie Berhad has implemented the Complaint Book (Internal), Complaint/Feedback Form (External), and Communication Book (Internal &amp; External) to document communications and complaints. The majority of complaints from internal stakeholders, primarily workers, were related to housing repairs (submitted through OPP Platform), which, according to records, were promptly addressed and resolved by estate management. Sighted the Grievance Response Standard Operating (Version 3.0, date approved on 07/05/2024). The timeline for the investigation is guided by the criteria as follow:</p> <table> <tr> <th>Criteria</th><th>Example of grievance</th><th colspan="2">Timeline</th></tr> <tr> <td>Inquiries or confirmation from operating units without interview of witness or review of documents</td><td>Request for repatriation, inquiries on housing condition and repairs, understanding of wage calculation, requests of transfer</td><td>Non-anonymous</td><td>2 weeks</td></tr> <tr> <td rowspan="2">Investigations involving interview of complaint and review of documents (not complex)</td><td rowspan="2">Does not involve interviews with randomly selected workers</td><td>Non-anonymous</td><td>Not more than 4 weeks</td></tr> <tr> <td>Anonymous</td><td>Not more than 3 months</td></tr> </table>	Criteria	Example of grievance	Timeline		Inquiries or confirmation from operating units without interview of witness or review of documents	Request for repatriation, inquiries on housing condition and repairs, understanding of wage calculation, requests of transfer	Non-anonymous	2 weeks	Investigations involving interview of complaint and review of documents (not complex)	Does not involve interviews with randomly selected workers	Non-anonymous	Not more than 4 weeks	Anonymous	Not more than 3 months	Complied
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		Anonymous	Not more than 3 months														

Criterion / Indicator		Assessment Findings				Compliance
		Investigation involving interview of randomly selected workers/witness and review of documents (complex), where the complainant is not disclosed. Complainant gives the name of the alleged. In this case, many group of randomly selected workers will have to be interviewed to validate the allegations, hence, resulting in an extended period of investigations	Harassment or disrespect by supervisor, unfair termination, Fraud, misappropriation, manipulation of documents	Non-anonymous and anonymous	Not more than 3 months	
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. <b>- Major compliance -</b>	There is a complaint received from Suara Kami for Flemington Estate. The grievant hopes the road will be repaired as there is a concern for children's safety especially on rainy season. Verify the complaint has been resolved during site visit at worker complex main division Batu 16. Sample of complaints received at OPP platform for Flemington Estate on 31/07/2024 (Latest). Sighted the complaint has been				Complied

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		resolved by the management on 02/08/2024. Verify during site visit at worker living quarters, the complaint has been complete. There is no complaint received at Suara Kami at Sabak Bernam Estate. Complaints received at OPP platform has been resolved within the agreed timeframe.	
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. <b>- Minor compliance -</b>	For Complaint/Feedback Form by the stakeholders, action taken by the management was acknowledged by the complainant to be resolved within agreed timeframe. The affected stakeholders can make complaint by scanning using the bar code provided at the premise either using Suara Kami, Whistleblowing or OPP platform	Complied
<b>4.4.2.4</b>	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. <b>- Minor compliance -</b>	<u>Flemington Estate</u> The awareness on surrounding communities for complaints or suggestion have been given during "Mesyuarat Stakeholder 2024" dated 07/05/2024 at Flemington Estate Communal Hall. The estate management has also conducted the training for employees and stakeholders respectively. Details of the training is such as follow: <ul style="list-style-type: none"> <li>Workers</li> </ul> Title: OPP/ E-Sime Refreshment Training, ILO Refreshment and Grievance Training Date: 02/02/2024, 03/01/2024 Evidence: Photos and attendance list <u>Sabak Bernam Estate</u> The awareness on surrounding communities for complaints or suggestion have been given during "Mesyuarat Stakeholder 2024" dated 13/05/2024 at Sabak Bernam Estate Communal Hall. The estate	Complied

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		<p>management has also conducted the training for employees and stakeholders respectively. Details of the training is such as follow:</p> <ul style="list-style-type: none"> <li>Workers</li> </ul> <p>Title: Grievance Channels, ILO Indicators, OPP, Working hours, Discrimination, threats, sexual and physical violence, restriction of movement, passport, and social dialogue</p> <p>Date: 5 – 15/02/2024.</p> <p>Evidence: Photos and attendance list</p>	
<b>4.4.2.5</b>	<p>Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.</p> <p><b>- Major compliance -</b></p>	A check of records revealed that complaints and requests from the last 24 months are accessible.	Complied
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
<b>4.4.3.1</b>	<p>Growers should contribute to local development in consultation with the local communities.</p> <p><b>- Minor compliance -</b></p>	<p><u>Flemington Estate</u></p> <p>For contribution to local development, the estate has contributed in helping the SJK(T) Ladang New Coconut for drainage cleaning. Sighted the letter of "Ucapan Terima Kasih dan Penghargaan di Atas Bantuan", dated 21/05/2024, reference: SJKTLNC-02/2024 and photos of the activity as per audit.</p> <p><u>Sabak Bernam Estate</u></p> <p>For contribution to local development, the estate has contributed to providing two man powers for cleaning purposed at Sri Subaramanar Temple on 23 – 24/01/2024.</p>	Complied
<b>Criterion 4.4.4: Employees safety and health</b>			

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<p><b>4.4.4.1</b> An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>SOU 4 audited estates have adopted and maintained the policy for Occupational Health and Safety as documented below:</p> <ul style="list-style-type: none"> <li>• Document: SD Guthrie Berhad Group Health, Safety &amp; Environment (HSE) Policy</li> <li>• Reference No: IOM-CEOUM/HSE-014-05-2022</li> <li>• Date: 05/05/2022</li> <li>• Signed by: Group Managing Director.</li> </ul> <p>The Policy stated the company commitment to the well-being of its employee, providing safe and healthy working environment, pre-emptively preventing our employees and external parties in the operations from injury and ill health as well as operating in an environmentally responsible manner at global operating sites.</p> <p>The policy also emphasized commitment to comply with the followings:</p> <ul style="list-style-type: none"> <li>- statutory requirements,</li> <li>- inculcating the culture of safety and health,</li> <li>- improving the management of occupational safety, health and</li> <li>- environmental matters eliminating or minimizing any potential adverse effect on the environment arising from or business activities.</li> <li>- to educate and encourage stakeholders in maintaining and enhancing the quality of the health, safety and environment.</li> </ul> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates. Verified the Communication of the Occupational Health and Safety Policy as below:</p> <p>a. Flemington Estate – 06/02/2024 attended by 146 workers.</p>	<p>Complied</p>

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		<p>b. Sabak Bernam Estate – 08/05/2024 attended by 177 workers.</p> <p>An occupational safety and health plan has been reviewed and verified as follows:</p> <ul style="list-style-type: none"> <li>• Document: Safety &amp; Health Management Plan 2024</li> <li>• Amongst OSH Plan are: <ul style="list-style-type: none"> <li>- OSH Risk Management</li> <li>- OSH Structure</li> <li>- Incident Reporting</li> <li>- Emergency Preparedness &amp; response</li> <li>- Chemical safety Management</li> <li>- Contractor Safety Management</li> <li>- Vehicle &amp; Machinery safety Management</li> <li>- Communication</li> <li>- Inspection</li> <li>- Health and Hygiene Monitoring Program</li> <li>- Awareness and competency Training</li> <li>- Reporting</li> </ul> </li> </ul> <p>The plan being monitored and reviewed on quarterly basis as follows:</p> <p><u>Flemington Estate</u></p> <ul style="list-style-type: none"> <li>- Latest Review: 30/6/2024</li> <li>- Next review: July – September 2024</li> <li>- Remarks: Maintained</li> </ul>	

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		<u>Sabak Bernam Estate</u> - Latest Review: 31/7/2024 - Next review: October - December 2024 - Remarks: Maintained	
<b>4.4.4.2</b>	<p>The occupational safety and health plan shall cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <p>i. all employees involved shall be adequately trained on safe working practices</p> <p>ii. all precautions attached to products shall be properly observed and applied</p> <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust</p>	<p>The Safety and Health Plan covered the implementation among others as below:</p> <p>a) SOU 4 audited estates have adopted and maintained the policy for SD Guthrie Berhad Group Health, Safety &amp; Environment (HSE) Policy</p> <ul style="list-style-type: none"> <li>Reference No: IOM-CEOUM/HSE-014-05-2022</li> <li>Date: 05/05/2022</li> <li>Signed by: Group Managing Director</li> </ul> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates as verified the Communication of the Occupational Health and Safety Policy as stated in 4.4.4.1.</p> <p>b) SOU 4 Certification Unit estates have conducted and duly documented risk assessments for all the operations. Verified the followings:</p> <p><u>Flemington Estate</u></p> <ul style="list-style-type: none"> <li>HIRARC was used to assess all risks associated with the operations in the estate. The HIRARC register was available for verification and recently reviewed on 03/05/2024 for Harvesting process due to occupational accident. Verified there are 13 Process/Section identified.</li> </ul>	Complied

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<p>must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<ul style="list-style-type: none"> <li>▪ Chemical Health Risk Assessment (CHRA) was conducted to assess the hazards associated with the hazardous chemicals used in the estate as verified below: <ul style="list-style-type: none"> <li>- Conducted by: Gxxxxxxx Sdn Bhd</li> <li>- Assessment date: 18/06/2020</li> <li>- Assessor: Haji Sxxxxx Cxxx</li> <li>- DOSH Registration: HQ/09/ASS/00/124</li> <li>- Report Number: HQ/09/ASS/00/124 – 2020/2022</li> </ul> </li> </ul> <p>Verified, Flemington Estate has conducted a new assessment dated 03/06/2023 and revisit dated 23/07/2024 due to introduction of operational new mechanization chemical spraying activities and new chemicals register. Pending Report.</p> <ul style="list-style-type: none"> <li>▪ Medical Surveillance as per OSHA-USECHH 2000 requirements <ul style="list-style-type: none"> <li>- Conducted by: Sxxxx Dxxxxxxxxx</li> <li>- OHD: Dr. Rxxxxxxxx R Nxxxx(HQ/08/DOC/00/131)</li> <li>- Dated 23/01/2024.</li> <li>- No of workers 29 workers</li> <li>- The result stated that all 29 workers passed the medical program and were fit to work.</li> </ul> </li> <li>▪ Noise Risk Assessment Report (NRA) was conducted in compliance with Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 and is available for verification.</li> </ul>	



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		<ul style="list-style-type: none"> <li>- Conducted by: Sx Sxxxxx Cxxxxxxxxxxx Sdn Bhd</li> <li>- Date: 07/07/2020</li> <li>- Assessor: Muhamad Hafiz bin Hasan</li> <li>- DOSH Reg Number: HQ/18/PEB/00/00021</li> </ul> <ul style="list-style-type: none"> <li>▪ Audiometric test – Not applicable for Flemington Estate.  <u>Sabak Bernam Estate</u></li> <li>▪ HIRARC was used to assess all risks associated with the operations in the estate. The HIRARC register was available for verification and recently reviewed on 15/04/2024 for all operations.</li> <li>▪ Chemical Health Risk Assessment (CHRA) was conducted to assess the hazards associated with the hazardous chemicals used in the estate as verified below: <ul style="list-style-type: none"> <li>- Conducted by: Gxxxxxx. Sdn Bhd</li> <li>- Assessment date: 26/06/2020</li> <li>- Assessor: Haji Sxxxxx Cxxx</li> <li>- DOSH Registration: HQ/09/ASS/00/124</li> <li>- Report Number: HQ/09/ASS/00/124 – 2020/0024</li> </ul> </li> <li>▪ Medical Surveillance as per OSHA-USECHH 2000 requirements <ul style="list-style-type: none"> <li>- Conducted by: Sxxxx Dxxxxxxxxxx</li> <li>- OHD: Dr. Rxxxxxxxx R Nxxx (HQx/08/DOC/00/131)</li> <li>- Dated 23/01/2024.</li> <li>- Report Number: OHD/10001/23012024</li> <li>- No of workers 21 workers</li> <li>- The result stated that all 21 workers passed the medical</li> </ul> </li> </ul>	

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		<p>program and were fit to work.</p> <ul style="list-style-type: none"> <li>▪ Noise Risk Assessment Report (NRA) was conducted in compliance with Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 and is available for verification. <ul style="list-style-type: none"> <li>- Conducted by: Mxxxx Sxxxx</li> <li>- Date: 12/06/2023</li> <li>- Assessor: Mxxx Hxxxx bin Yxxxx</li> <li>- DOSH Reg Number: HQ/09/PEB/00/97</li> </ul> </li> <li>▪ Audiometric test – was conducted in compliance with Section 56 Occupational Safety and Health Act 1994 (Act 514) <ul style="list-style-type: none"> <li>- Conducted by: Exxxxxxx Nx Lxxxxxxx Sdn Bhd</li> <li>- Date: 26/10/2023</li> <li>- Assessor: Wxxx Kxx Lxx</li> <li>- DOSH Reg. No: HQ/08/DOC/00/3</li> </ul> </li> </ul> <p>Result:</p> <ul style="list-style-type: none"> <li>○ Tested 5 workers</li> <li>○ Results – Hearing impairment 2, Hearing Loss 3</li> </ul> <p>c) (i) SOU 4 audited estates have established training programs for management teams, workers and contractors including pesticides applicators, programmed throughout the year. The training was conducted by those with knowledge of chemical handling.</p> <p><u>Flemington Estate</u></p> <ul style="list-style-type: none"> <li>- Trunk injection training – 03/05/2024 attended by 17 workers</li> <li>- Chemical handling training and PPE – 10/05/2024 attended – 2</li> </ul>	

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		<p>workers</p> <p><u>Sabak Bernam Estate</u></p> <ul style="list-style-type: none"> <li>- Refresher training Chemical handling – 06/06/2024 – attended by 6 workers</li> </ul> <p>ii) The up-to-date chemical register, trade and generic names, and their Safety data Sheet were available for verification.</p> <p><u>Flemington Estate</u></p> <ul style="list-style-type: none"> <li>• Latest chemical register updated 29/04/2024</li> <li>• Sample SDS <ul style="list-style-type: none"> <li>- Product Name: PROMAX</li> <li>- Formulation: Soluble Powder</li> <li>- Chemical group: Organophosphate</li> <li>- Recommended use: Insecticide</li> <li>- Hazard Classification: <ul style="list-style-type: none"> <li>○ Not listed as hazardous under the criteria of the OSHA Industry Code of Practice on Chemicals Classification and Hazard Communication 2014 (Malaysia)</li> <li>○ Classification of the hazardous chemical according to the Regulation (EC) No. 1272/008 <ul style="list-style-type: none"> <li>- Acute oral toxicity, Category 4 – H302</li> </ul> </li> </ul> </li> </ul> </li> </ul> <p><u>Sabak Bernam Estate</u></p>	

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		<ul style="list-style-type: none"> <li>- Latest chemical register updated 02/05/2024.</li> <li>- Sample SDS <ul style="list-style-type: none"> <li>• Trade name: Metfuron 20</li> <li>• Recommended use: Herbicide</li> <li>• Supplier: Farmcochem Sdn Bhd</li> <li>• Hazard classification <ul style="list-style-type: none"> <li>- H-412: Harmful to aquatic life with long lasting effects</li> </ul> </li> </ul> </li> <li>d. Appropriate PPE is provided by the estate's management based on potentially hazardous identified in the risk assessment and control (HIRARC). PPE Issuance record is available for verification. Inspected with sample workers interviewed found all PPE was given according to their task given.  Verified the PPE issuance as follows:</li> </ul> <p><u>Flemington Estate</u>  Recipient – Rxxxx</p> <ul style="list-style-type: none"> <li>• Wellington Boot – 22/2/2024, 19/4/2024, 13/6/2024, 7/8/2024</li> <li>• Cotton Glove – 10/05/2024, 13/06/2024,</li> </ul> <p><u>Sabak Bernam Estate</u>  Recipient – Rxxxx a/l Sxxxxxxxxxx</p> <ul style="list-style-type: none"> <li>• Safety boot dated – 25/3/2024</li> </ul>	

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		<p>e) Standard Operating Procedures for Handling of Chemicals were available and documented as follows:</p> <ul style="list-style-type: none"> <li>• Document: Chemical Safety Management Procedure</li> <li>• Reference No: UM/HSE/OCP/04</li> <li>• Approved date: 09 March 2021</li> </ul> <p>All chemicals were found stored in accordance with Occupational Safety Health(Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>At the entrance door, signage requiring donning of PPE was visibly posted as verified from the pictures provided. The Chemical Store signage with the required Hazard Symbols were available at the entrance. The up-to-date chemical register, trade and generic names, and their Safety data Sheet were available for verification.</p> <p>f) The management have appointed responsible person in their respective estates as the person responsible for all safety and health issues within the operating unit.</p> <p><u>Flemington Estate</u></p> <ul style="list-style-type: none"> <li>• Appointed person: Tn. Roshaisam bin Roselee</li> <li>• Date: 01 January 2023</li> <li>• Appointed by: Pn. Nik Maziah Nik Mustapha, Regional Chief Executive Officer.</li> </ul>	

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		<p>The management has also appointed En. Syamsul Qamar bin Mohamed Yusof as OSH Coordinator as per appointment letter dated 01 January 2024 by Estate Manager</p> <p><u>Sabak Bernam Estate</u></p> <ul style="list-style-type: none"> <li>• Appointed person: Tn. Mohd Mahyudin bin Mohd Yunus</li> <li>• Date: 06 January 2023</li> <li>• Appointed by: Nik Maziah Nik Mustapha, Regional Chief Executive Officer.</li> </ul> <p>The management has also appointed En. Zulkarnain Mohammed as OSH Coordinator as per appointment letter dated 20 March 2023 by Estate Manager</p> <p>g) SOU 4 Certification Unit estates conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees' safety, health, and welfare such as operational risks and health achievement report, estate security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training. Sighted the latest OSH Meeting Minutes dated as follows:</p> <p><u>Flemington Estate</u></p> <ul style="list-style-type: none"> <li>▪ Year 2024 – 22/03/2024, 25/06/2024</li> </ul>	

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		<p><u>Sabak Bernam Estate</u></p> <ul style="list-style-type: none"> <li>▪ Year 2024 – 26/01/2024, 25/4/2024, 24/7/2024</li> </ul> <p>h) Emergency Response Plan Flow Charts were available to address emergencies as per verified document below:</p> <ul style="list-style-type: none"> <li>• Document: Emergency Preparedness &amp; Response Procedures</li> <li>• Reference No: UM/HSE/SP/02</li> <li>• Date: 17/11/2021</li> </ul> <p>Therein, the management emphasized the procedures of:</p> <ol style="list-style-type: none"> <li>i. Categories of emergencies</li> <li>ii. Responding to Incidents and Emergency Situations such as <ul style="list-style-type: none"> <li>- Fire, Explosion, Injuries/Trauma, Major Spillage, Building Failure, Electrical shock, Radiation leak, Bomb threat, public unrest, Disease outbreak, Gas leak, Food poisoning, Human/animal epidemic, Haze, Flood, Tsunami, Typhoon, Earthquake, Water supply interruption, Electrical supply interruption, Adverse weather.</li> </ul> </li> <li>iii. Emergency Drills</li> </ol> <p>Both audited estates have established Emergency Response Team lead by the Estate Managers. The ERT chart and Fire Extinguisher Map were available for verification.</p> <p>Sighted the ERP trainings as below:</p> <p>Flemington Estate</p> <ul style="list-style-type: none"> <li>- Fire Drill and Fire Fighting Training– 13/05/2024 attended by 41</li> </ul>	

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		<p>workers.</p> <p><u>Sabak Bernam Estate</u></p> <ul style="list-style-type: none"> <li>- Fire Drill Training – 15/5/2024 attended by 16 workers.</li> </ul> <p>i) First aiders were stationed at all workstation/operations at the estates. The first aiders were responsible for first aid box at each workstation/operation assigned to them by the management. The first aid boxes are frequently replenished with to replace used items and expired items.</p> <p>The first aid box holders are regularly trained, and the training records were verified as below:</p> <p><u>Flemington Estate</u></p> <ul style="list-style-type: none"> <li>- Refresher First Aid Training – 9/5/2024 attended by 8 workers</li> <li>- Basic Occupational First Aid &amp; CPR Training (First Aider) – 25-26 October 2023 <ul style="list-style-type: none"> <li>i. Pxxxxxx a/p Sxxxxxxx</li> <li>ii. Nxx Sxxxxxxx binti Axxxx</li> </ul> </li> </ul> <p><u>Sabak Bernam Estate</u></p> <ul style="list-style-type: none"> <li>- Refresher First Aid Training – 7/6/2024 attended by 10 workers</li> <li>- Basic Occupational First Aid &amp; CPR Training (First Aider) – 25-26 /10/2023 <ul style="list-style-type: none"> <li>i. S. Pxxxxxxxx</li> <li>ii. Nxxxxxxxx binti Zxxxx</li> </ul> </li> </ul>	



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		<p>j) Records of accidents were maintained by all estates and updated to the HQ monthly. Accidents that occur are also discussed in the quarterly held JKKP Meetings. Verified the followings:</p> <p><u>Flemington Estate</u></p> <ul style="list-style-type: none"><li>- Submission of 2023 JKKP 8 – 23/01/2024 Reference No: JKKP 8/165516/2023.</li><li>- Accident reported - There was a total of 2 accident cases reported for the year with LTI of 50 days.</li><li>- There was no accident cases reported for the year 2024.</li></ul> <p><u>Sabak Bernam Estate</u></p> <ul style="list-style-type: none"><li>- Submission of 2023 JKKP 8 – 30/01/2024 Reference No: JKKP 8/165115/2023.</li><li>- Accident reported - There was a total of 13 accident cases reported for the year with LTI 19 days.</li><li>- There was no accident cases reported for the year 2024.</li></ul>			
Criterion 4.4.5: Employment conditions					
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>The good social practices regarding human rights in respect of industrial harmony has been embedded in SD Guthrie Berhad’s established policy of “Group Sustainability &amp; Quality Policy Statement” which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019.</p> <p>Estate policy briefing was conducted such as follow:</p> <table><tr><td>Estate</td><td>Date</td></tr></table>	Estate	Date	Complied
Estate	Date				

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Criterion / Indicator		Assessment Findings		Compliance
		Flemington	06/02/2024	
		Sabak Bernam	12/06/2024	
<b>4.4.5.2</b>	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - <b>Major compliance</b> -	Records of employments and interview conducted on-site with randomly selected sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against. This verified as per interview with gender committee and workers representatives.		Complied
<b>4.4.5.3</b>	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - <b>Major compliance</b> -	Based on agreements and pay slips sighted for sample employees as per indicator 4.4.5.6 below, management has ensured that employees' pay and conditions are in line with the mandatory Minimum Wage Order 2022 enforced by the government. Sample of the wages received by the workers is such as follow: <u>Flemington Estate</u> 1. Employee Number: 0000139xxx <ul style="list-style-type: none"> <li>May: RM 2,725.95</li> <li>June: RM 2,440.42</li> <li>July: RM 2,635.75</li> </ul> 2. Employee Number: 0000076xxx <ul style="list-style-type: none"> <li>May: RM 2,195.82</li> <li>June: RM 2,070.19</li> <li>July: RM 2,198.20</li> </ul> 3. Employee Number: 0000151xxx <ul style="list-style-type: none"> <li>May: RM 3,269.93</li> </ul>		Complied

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		<ul style="list-style-type: none"> <li>June: RM 2,855.92</li> <li>July: RM 3,594.37</li> </ul> <p>4. Employee Number: 0000123xxx</p> <ul style="list-style-type: none"> <li>May: RM 2,865.35</li> <li>June: RM 2,030.63</li> <li>July: RM 2,195.84</li> </ul> <p>5. Employee Number: 0000153xxx</p> <ul style="list-style-type: none"> <li>May: RM 2,703.51</li> <li>June: RM 2,553.46</li> <li>July: RM 2,694.33</li> </ul> <p>6. Employee Number: 0000116xxx</p> <ul style="list-style-type: none"> <li>May: RM 3,395.80</li> <li>June: RM 2,508.34</li> <li>July: RM 3,122.49</li> </ul> <p>7. Employee Number: 0000162xxx</p> <ul style="list-style-type: none"> <li>May: RM 3,286.57</li> <li>June: RM 2,866.54</li> <li>July: RM 3,094.20</li> </ul> <p>8. Employee Number: 0000xxx885</p> <ul style="list-style-type: none"> <li>May: RM 2,759.60</li> <li>June: RM 2,348.33</li> <li>July: RM 560.43</li> </ul>	

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		<p><u>Sabak Bernam Estate</u></p> <ul style="list-style-type: none"> <li>Employee Number: 0000091xxx <ul style="list-style-type: none"> <li>May: RM 3,290.17</li> <li>June: RM 2,340.81</li> <li>July: RM 2,724.98</li> </ul> </li> <li>Employee Number: 0000082xxx <ul style="list-style-type: none"> <li>May: RM 2,746.41</li> <li>June: RM 2,054.63</li> <li>July: RM 2,125.51</li> </ul> </li> <li>Employee Number: 0000107xxx <ul style="list-style-type: none"> <li>May: RM 3,028.31</li> <li>June: RM 2,759.19</li> <li>July: RM 2,907.01</li> </ul> </li> <li>Employee Number: 0000185xxx <ul style="list-style-type: none"> <li>May: RM 547.68 (8 working days)</li> <li>June: RM 1,838.25</li> <li>July: RM 1,873.51</li> </ul> </li> <li>Employee Number: 0000151xxx <ul style="list-style-type: none"> <li>May: RM 2,710.44</li> <li>June: RM 2,484.25</li> <li>July: RM 2,832.03</li> </ul> </li> <li>Employee Number: 0000020xxx</li> </ul>	

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		<ul style="list-style-type: none"> <li>May: RM 2,247.56</li> <li>June: RM 2,228.42</li> <li>July: RM 2,190.48</li> <li>Employee Number: 0000116xxx <ul style="list-style-type: none"> <li>May: RM 3,002.15</li> <li>June: RM 2,751.47</li> <li>July: RM 3,059.94</li> </ul> </li> <li>Employee Number: 0000xxx005 <ul style="list-style-type: none"> <li>May: RM 1,579.94</li> <li>June: RM 1,506.45</li> <li>July: RM 1,619.63</li> </ul> </li> </ul>	
<b>4.4.5.4</b>	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>The estate kept records of contractor's workers agreement (Fxxx Txxxxxxxxxxxx FFB Transporter), attendance and pay slips as per records. Employees sampling shows the compliance of minimum wages 2022. It is verified that the Contractor has submitted the Employment Contract, Salary Slip, EPF Statement, and SOCSO Statement to both estate visited. Sample of the workers is such as follow:</p> <ol style="list-style-type: none"> <li>Mxxxxxxxx A/L Cxxxxx</li> <li>Dxxx A/L Sxxxxxxxx</li> <li>Pxxxx Mxxxxx A/L Sxxx</li> </ol> <p><u>Sabak Bernam Estate</u></p> <p>The estate kept records of contractor's workers agreement (Axxxx Mxxx Axxxxxxxx Sdn Bhd, FFB Transporter), attendance and pay slips</p>	Complied

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		<p>as per records. Employees sampling shows the compliance of minimum wages 2022. It is verified that the Contractor has submitted the Employment Contract, Salary Slip, EPF Statement, and SOCSO Statement to the both estate visited. Sample of the workers is such as follow:</p> <ol style="list-style-type: none"> <li>1. Sxxxxxxxx Bxx Oxxxxx</li> <li>2. Pxxxxx A/L Sxxxxxxxxx</li> <li>3. Kxxxxxxxx A/L Rxxxxxx</li> </ol>	
<b>4.4.5.5</b>	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>	<p>The established records of Employee Masterlist which available as a database in computerized Checkroll System able to provide accurate account of all employees including their particulars of full names, gender, date of birth, date joined company, wages grade and position etc.</p>	Complied
<b>4.4.5.6</b>	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>Review on the sampled of employment contracts verified terms and conditions outlined as per collective agreement and Employment Act 1955.</p> <p>The original copy kept by management demonstrated in workers' origin language and signed by the worker.</p> <p>Onsite interview with sampled workers informed they have been briefed on the employment conditions and benefits as stated in employment contract. They have also been handed a copy of the contract for own selves keeping and reference. Sample as following:</p> <p><u>Flemington Estate</u></p> <ol style="list-style-type: none"> <li>1. Employee Number: 0000139xxx</li> <li>2. Employee Number: 0000076xxx</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>3. Employee Number: 0000151xxx 4. Employee Number: 0000123xxx 5. Employee Number: 0000153xxx 6. Employee Number: 0000116xxx 7. Employee Number: 0000162xxx 8. Employee Number: 0000xxx885</p> <p><u>Sabak Bernam Estate</u> 1. Employee Number: 0000091xxx 2. Employee Number: 0000082xxx 3. Employee Number: 0000107xxx 4. Employee Number: 0000185xxx 5. Employee Number: 0000151xxx 6. Employee Number: 0000020xxx 7. Employee Number: 0000116xxx 8. Employee Number: 0000xxx005</p>	
<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. <b>- Major compliance -</b>	Attendance (out-turn) and work hours (normal time & overtime) recording system established in both manual and computerized check roll system which makes working hours and overtime transparent for both employees and employer. The monitoring of time recording system was monitor through the system of Estate Daily Attendance Report.	Complied
<b>4.4.5.8</b>	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations	Interview with the workers, verify that they are all aware with the working hour and break in the estate. Based on records of sample	Complied

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	and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - <b>Major compliance</b> -	employees sighted in indicator 4.4.5.6 above, the working hours found in compliance with employees' terms and conditions of MAPA Circular No. 4/2020, The Malayan Agricultural Producers Association; Date: 30/1/2020; MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019. This also in line with Malaysia Employment Act 1955.	
<b>4.4.5.9</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - <b>Major compliance</b> -	Interview with the workers, verify that they are all aware with the working hour and break in the estate and also know how to calculate their wages and overtime payment. Based on records of sample employees sighted in indicator 4.4.5.6 above, the working hours found in compliance with employees' terms and conditions of MAPA Circular No. 4/2020, The Malayan Agricultural Producers Association; Date: 30/1/2020; MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019. This also in line with Malaysia Employment Act 1955. Daily attendance and total hours of overtime will be recorded into SAP system. Wages and overtime were paid according to the Daily Attendance Report, and productivity reports. Copy printed of the payslip will be kept to workers upon payday as evidence for reference.	Complied
<b>4.4.5.10</b>	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - <b>Minor compliance</b> -	<u>Flemington Estate</u> The workers are given allowance for attending the Social Dialogue sessions. The allowance was given RM25 per month and also received 10kg rice for every 2 months. <u>Sabak Bernam Estate</u> The workers are given allowance for attending the Social Dialogue sessions. The allowance was given RM25 per month and also received	Complied



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		10kg rice for every 2 months. The workers were also provided with phone allowance (RM 5).	
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. <b>- Major compliance -</b>	<p>All workers are provided with free housing facilities that included basic amenities such as clean water, community hall, sport facilities, etc. were provided to the workers. Electricity which is obtained from the national grid. The housing condition was in accordance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446). SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established Workers Housing Management Procedure 2022, Ver.01, dated 30/06/2022 as guidelines to continuously improve of living standards of their employee in estates and mill operations. Its shown company commitment in managing employee's housing repair and maintenance through digital platform named Digital Housing Complaint system or 'OilPalmPal'.</p> <p>Interview with the workers confirmed that they did not have any complaint or grievance related to housing to be reported.</p> <p>Verification on the housing inspection checklist and site visit found the correlation between the checklist and actual condition. The management of both estates has conducted weekly housing inspection. Verification made through the checklist.</p>	Complied
<b>4.4.5.12</b>	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. <b>- Major compliance -</b>	The management have already established the Sexual Harassment Policy under Human Rights Charter revised 2020. The management established Term of Reference for Gender Representatives and Gender Committees on March 2021. Based on the SOP of Gender Committee Guidelines (version 2.0, date approved January 2024), the meeting was conducted minimum every 3 months. Verify from the interview with the gender committee representative and female workers, no issues of sexual harassment or physical violence activity have been	Complied

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		and confirmed. Gender committee meeting was conducted such as follow: <table><tr><th>Estate</th><th>Date</th></tr><tr><td>Flemington</td><td>17/05/2024</td></tr><tr><td>Sabak Bernam</td><td>08/08/2024</td></tr></table>	Estate	Date	Flemington	17/05/2024	Sabak Bernam	08/08/2024	
Estate	Date								
Flemington	17/05/2024								
Sabak Bernam	08/08/2024								
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. <b>- Major compliance -</b>	Policy to respect the rights of all employees has been embedded in SD Guthrie Berhad (formally known as Sime Darby Plantation Berhad) established policy of "Group Sustainability & Quality Policy Statement" which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019. During interview with the workers, verify the worker were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample sighted as per sample latest minutes of meeting between Management and NUPW representatives. <table><tr><th>Estate</th><th>Date</th></tr><tr><td>Flemington</td><td>06/12/2023</td></tr><tr><td>Sabak Bernam</td><td>06/02/2023</td></tr></table>	Estate	Date	Flemington	06/12/2023	Sabak Bernam	06/02/2023	Complied
Estate	Date								
Flemington	06/12/2023								
Sabak Bernam	06/02/2023								
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions. <b>- Major compliance -</b>	Policy to protect children and young person has been embedded in SDPB's established policy of "Group Sustainability & Quality Policy Statement" which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 02/12/2019. Based on the interview, sight inspection and sighted records of worker's database, there is no young person below 18 years old were employed within all operating units within SOU 4.	Complied						
Criterion 4.4.6: Training and competency									

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<p><b>4.4.6.1</b> All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p><b>- Major compliance -</b></p>	<p>SOU 4 audited estates have established a training program for all workers based on the training need analysis conducted on a yearly basis. Annual Safety &amp; Health Program; Safety and Health Program for the year 2024.</p> <p>Such training programmes verified are:</p> <ul style="list-style-type: none"> <li>- SDP Policies</li> <li>- Chemical Handling Management</li> <li>- Hearing Conservation Training</li> <li>- Ergonomic Training</li> <li>- S&amp;H Committee Training</li> <li>- Emergency Response Team Training</li> <li>- Basic Occupational First Aid &amp; CPR Training</li> <li>- Schedule Waste Management Training</li> <li>- Environment Risk Assessment (EIE, EAIA)</li> <li>- Water Quality Management</li> <li>- High Conservation value training</li> <li>- RSPO &amp; MSPO Training (including Supply Chain)</li> <li>- Contract Management</li> <li>- COBC, Whistle Blowing &amp; Policy</li> <li>- HCTP</li> <li>- ILO 11 Indicator Component training</li> <li>- Social Dialogue Training to WR/Management by HQ</li> <li>- Accident and LFI sharing session</li> <li>- TDOIT/TDCC</li> </ul>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance																																				
		<div><div><div><div><div><div></div><div>Repair work procedure</div></div><div><div></div><div>Permit to work</div></div></div></div></div><div>Records of trainings conducted were maintained by the estates as below:</div><table><thead><tr><th colspan="3">Flemington Estate</th></tr><tr><th>Training</th><th>Date</th><th>Attendees</th></tr></thead><tbody><tr><td>Occupational Health and Safety Policy</td><td>06/02/2024</td><td>146</td></tr><tr><td>Chemical handling training and PPE</td><td>10/05/2024</td><td>2</td></tr><tr><td>Fire Drill and Fire Fighting Training</td><td>13/05/2024</td><td>41</td></tr><tr><td>Refresher First Aid Training</td><td>09/05/2024</td><td>8</td></tr></tbody></table><table><thead><tr><th colspan="3">Sabak Bernam Estate</th></tr><tr><th>Training</th><th>Date</th><th>Attendees</th></tr></thead><tbody><tr><td>Contractor Compliance Training on Safety &amp; Social Aspects</td><td>23/02/2024</td><td>10</td></tr><tr><td>Refresher training RSPO/MSPO Sime Darby Policies, COBC, Environmental,HCV training</td><td>08/05/2024</td><td>177</td></tr><tr><td>Refresher Training Schedule Waste</td><td>17/07/2024</td><td>9</td></tr><tr><td>Refresher Training Chemical Handling</td><td>06/06/2024</td><td>6</td></tr></tbody></table></div>	Flemington Estate			Training	Date	Attendees	Occupational Health and Safety Policy	06/02/2024	146	Chemical handling training and PPE	10/05/2024	2	Fire Drill and Fire Fighting Training	13/05/2024	41	Refresher First Aid Training	09/05/2024	8	Sabak Bernam Estate			Training	Date	Attendees	Contractor Compliance Training on Safety & Social Aspects	23/02/2024	10	Refresher training RSPO/MSPO Sime Darby Policies, COBC, Environmental,HCV training	08/05/2024	177	Refresher Training Schedule Waste	17/07/2024	9	Refresher Training Chemical Handling	06/06/2024	6	
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Refresher Training Chemical Handling	06/06/2024	6																																					
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. <b>- Major compliance -</b>	SOU 4 audited estates have identified training need analysis for all employees, management, and contractors. The training need was identified and analyzed based on the job designation and training required by the job scope and the requirement categorized as Awareness (A), Knowledge (K) and S (Skill). Sighted the followings: <ul style="list-style-type: none"><li>Document: Training Needs and Frequency Analysis</li></ul>	Complied																																				

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Criterion / Indicator		Assessment Findings	Compliance														
		<ul style="list-style-type: none"><li>Reference: Version 1 Year 2008, Issue 1 dated 01/11/2008</li><li>Revision date: 01/01/2024</li></ul>															
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. <b>- Minor compliance -</b>	A training programme has been developed and is available in the Annual Training Programme Year 2024. The established training programme guided by Standard Operating Manual Sub section 6.2 Procedure which covers competence, Awareness and training, Ref: Version 1 Year 2008, Issue 1 dated 01/11/2008.	Complied														
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services																	
Criterion 4.5.1: Environmental Management Plan																	
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. <b>- Major compliance -</b>	<div>SOU 4 audited estates have adopted and maintained the policy for SDP Group Health, Safety &amp; Environment (HSE) Policy<ul style="list-style-type: none"><li>Reference No: IOM-CEOUM/HSE-014-05-2022</li><li>Date: 05/05/2022</li><li>Signed by: Group Managing Director</li></ul>The policy has been communicated to the workers through training and displayed at various notice boards within the estates. Sighted the evidence:<table><tr><td rowspan="2">Description</td><td colspan="2">Estates</td></tr><tr><td>Flemington</td><td>Sabak Bernam</td></tr><tr><td>Document</td><td>Training Record</td><td>Training Record</td></tr><tr><td>Training</td><td colspan="2">Refresher Training RSPO &amp; MSPO, Sime Darby Policies</td></tr><tr><td>Date</td><td>23/04/2024</td><td>08/05/2024</td></tr></table></div>	Description	Estates		Flemington	Sabak Bernam	Document	Training Record	Training Record	Training	Refresher Training RSPO & MSPO, Sime Darby Policies		Date	23/04/2024	08/05/2024	Complied
Description	Estates																
	Flemington	Sabak Bernam															
Document	Training Record	Training Record															
Training	Refresher Training RSPO & MSPO, Sime Darby Policies																
Date	23/04/2024	08/05/2024															

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		<table><tr><td>Attendees</td><td>146 workers</td><td>177</td></tr></table> <p>The management also has established the environmental management plan to meet the objective and sustaining the environment and biodiversity. Sighted the evidence:</p> <ul style="list-style-type: none"><li>Document: Environmental Management Plan</li><li>Year: FY2024</li></ul>			Attendees	146 workers	177	
Attendees	146 workers	177						
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations.</p> <p><b>- Major compliance -</b></p>	<p>The management of SOU4 audited estates have established an environmental management (EMP) plan based on environmental aspect and impacts (EAI) analysis of all operations conducted. Sighted the evidence:</p> <ul style="list-style-type: none"><li>Document: Environmental Management Plan (EMP)</li><li>Year: FY2024</li></ul> <p>Therein, the plan emphasizes on the followings:</p> <ul style="list-style-type: none"><li>Environmental Risk Management<ul style="list-style-type: none"><li>To maintain the effectiveness of EIA/EIE</li></ul></li><li>Pollution Prevention<ul style="list-style-type: none"><li>Minimize pollution from estate activities.</li><li>Management of Scheduled waste</li><li>To ensure proper domestic disposal in accordance to SOP</li><li>To ensure no open burning at the workers housing complex</li></ul></li></ul> <p>The environment aspect impact (EAI) analysis has been established for all operation in the estate. Sighted the evidence:</p>			Complied			

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Criterion / Indicator		Assessment Findings			Compliance			
		<ul style="list-style-type: none"><li>▪ Document: Environment Aspect Impact Assessment</li><li>▪ Date review: 04/01/2024.</li></ul> Activities: Vehicle maintenance, storage diesel /petrol, chemical store, workshop, harvesting, spraying, manuring, weeding, road maintenance, transportation, dispensary, creche, compound, replanting. Verified the following: <ul style="list-style-type: none"><li>• Area station: FFB Loading – operation of FFB loading with implement (Grabber)<ul style="list-style-type: none"><li>▪ Environmental aspect – oil spillage</li><li>▪ Environmental impact – water pollution, land contamination, unpleasant working environment, business impact</li><li>▪ Mitigation plan<ul style="list-style-type: none"><li>- Waste collected to be stored and disposed as Scheduled waste.</li><li>- To maintain oil trap and parking bay, to provide spill tray for each vehicle and to prepare spill kit at worksite.</li><li>- To maintain regular vehicle inspection</li></ul></li></ul></li></ul>						
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.  - Major compliance -	The management has developed an environmental management plan (EMP) to mitigate the negative impacts and to promote the positive ones that were effectively implemented.  The monitoring on the action plan was reviewed on Year 2024. Sighted the evidence: <table><tr><td>Area</td><td>Negative Impacts</td><td>Positive Impacts</td></tr></table>			Area	Negative Impacts	Positive Impacts	Complied
Area	Negative Impacts	Positive Impacts						

Criterion / Indicator		Assessment Findings			Compliance									
		<table><tr><td>Housing Complex</td><td>Open burning can cause pollution</td><td>Prohibited open burning and rubbish collection every week</td></tr><tr><td>Chemical mixing</td><td>Chemical spillage cause pollution to environment</td><td>Built chemical sump at mixing area and reuse the chemical</td></tr><tr><td>Schedule waste</td><td>Chemical spillage cause pollution to environment</td><td>Provide spillage kit at schedule waste store The ensure proper of waste disposal as per legal</td></tr></table>	Housing Complex	Open burning can cause pollution	Prohibited open burning and rubbish collection every week	Chemical mixing	Chemical spillage cause pollution to environment	Built chemical sump at mixing area and reuse the chemical	Schedule waste	Chemical spillage cause pollution to environment	Provide spillage kit at schedule waste store The ensure proper of waste disposal as per legal	During the site visit, it was verification at schedule waste store, housing area and mixing chemical area. <ul style="list-style-type: none"><li>• No chemical spillage at schedule waste store</li><li>• There is spillage kit was provided at schedule waste store</li><li>• The wastewater from triple rinsing was recycle for spraying</li><li>• No evidence of burning at housing area</li><li>• There is bin provided at housing area</li></ul>		
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4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	A programmed to promote the positive impact has been included in the environmental management plan (EMP). The person in charge was included in the plan for monitoring the progress. Sighted the evidence: <ul style="list-style-type: none"><li>• Document: Environmental Management Plan (EMP)</li><li>• Year: FY2024</li></ul> Among action plan for the environment verified were: <ul style="list-style-type: none"><li>• Environmental Risk Management</li></ul>			Complied									



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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>- To maintain the effectiveness of EIA/EIE</li> <li>• Pollution Prevention <ul style="list-style-type: none"> <li>- Minimize pollution from estate activities.</li> <li>- Management of Scheduled waste</li> <li>- To ensure proper domestic disposal in accordance with SOP</li> <li>- To ensure no open burning at the workers housing complex</li> </ul> </li> </ul>	
<b>4.5.1.5</b>	<p>An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.</p> <p><b>- Major compliance -</b></p>	<p>For Year 2024, the management has continuously provided training to the workers to create awareness regarding the environment. This is to ensure the employees' understanding of the company policy and working towards achieving the environmental objectives.</p> <p>Among awareness and training carried out:</p> <p>Scheduled waste training: 17/07/2024</p> <p>Chemical Safe Handling (ERP and First Aid Measures): 6/06/20244</p>	Complied
<b>4.5.1.6</b>	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p><b>- Major compliance -</b></p>	<p>The management has been discussing the concern of environmental issues. The discussions on environmental issues were discussed with employees at the following forums. Sighted the evidence:</p> <ul style="list-style-type: none"> <li>• Stakeholder Meeting - 30/05/2023</li> <li>• ESH Meeting – 26/06/2023</li> <li>• Daily Master Briefing – 06/08/2023</li> </ul> <p>The meeting mainly discussion focused on the environmental issue such as:</p> <ul style="list-style-type: none"> <li>• Schedule waste management</li> <li>• Domestic waste management</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																																		
		<ul style="list-style-type: none"><li>• Housing inspection &amp; housing condition</li><li>• Legal compliance status</li></ul>																																			
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																																					
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- Major compliance -</p>	<p>The management has recorded the following range of diesel data and tabulated the ratio against FFB Produce to determine the efficiency of their operations.</p> <p>An assessment of the usage of non-renewable energy, including fossil fuels and electricity supply. It was made to include the operations over the base period recorded as follows:</p> <table><tr><th colspan="3">Year 2023 – Diesel usage</th></tr><tr><th rowspan="2">Description</th><th colspan="2">Estate</th></tr><tr><th>Flemington</th><th>Sabak Bernam</th></tr><tr><td>FFB production (m/tan)</td><td>33,095.84</td><td>40,763.00</td></tr><tr><td>Diesel usage (liter)</td><td>47,503.50</td><td>100,920.00</td></tr><tr><td>Baseline (l/mtan FFB)</td><td>1.47</td><td>2.48</td></tr><tr><th colspan="3">Year 2023 – Electricity usage</th></tr><tr><th rowspan="2">Description</th><th colspan="2">Estate</th></tr><tr><th>Flemington</th><th>Sabak Bernam</th></tr><tr><td>FFB production (m/tan)</td><td>33,095.84</td><td>40,763.00</td></tr><tr><td>Electric usage (kwh)</td><td>709,406.00</td><td>248,690.00</td></tr><tr><td>Baseline (kwh/mtan FFB)</td><td>21.58</td><td>6.10</td></tr></table> <p>Monthly records on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimize the use of renewable energy.</p>	Year 2023 – Diesel usage			Description	Estate		Flemington	Sabak Bernam	FFB production (m/tan)	33,095.84	40,763.00	Diesel usage (liter)	47,503.50	100,920.00	Baseline (l/mtan FFB)	1.47	2.48	Year 2023 – Electricity usage			Description	Estate		Flemington	Sabak Bernam	FFB production (m/tan)	33,095.84	40,763.00	Electric usage (kwh)	709,406.00	248,690.00	Baseline (kwh/mtan FFB)	21.58	6.10	Complied
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4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and	Estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy	Complied																																		

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	<p>electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p><b>- Major compliance -</b></p>	<p>efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations. Verified the followings:</p> <table><tr><th colspan="3">Flemington Estate – Year 2024</th></tr><tr><th></th><th>Estimate</th><th>To date Usage</th></tr><tr><td>Diesel Usage (Liter)</td><td>439,202.00</td><td>362,831.10</td></tr><tr><td>FFB Production (m/tan)</td><td>23,251.68</td><td>20,766.17</td></tr><tr><td>Baseline (L/mtan FFB)</td><td>18.89</td><td>17.47</td></tr></table> <p></p> <table><tr><th colspan="3">Sabak Bernam Estate – Year 2024</th></tr><tr><th></th><th>Estimate</th><th>To date Usage</th></tr><tr><td>Diesel Usage (Liter)</td><td>131,040</td><td>55,960</td></tr><tr><td>FFB Production (m/tan)</td><td>48,121</td><td>25,919</td></tr><tr><td>Baseline (L/mtan FFB)</td><td>2.72</td><td>2.16</td></tr></table> <p></p> <table><tr><th colspan="3">Flemington Estate – Year 2024</th></tr><tr><th></th><th>Estimate</th><th>To date Usage</th></tr><tr><td>Electric usage (kwh)</td><td>47,250.00</td><td>29,038.50</td></tr><tr><td>FFB Production (m/tan)</td><td>23,251.68</td><td>20,766.17</td></tr><tr><td>Baseline (L/mtan FFB)</td><td>2.032</td><td>1.40</td></tr></table> <p></p> <table><tr><th colspan="3">Sabak Bernam Estate – Year 2024</th></tr><tr><th></th><th>Estimate</th><th>To date Usage</th></tr><tr><td>Electric usage (kwh)</td><td>280,000</td><td>144,666</td></tr><tr><td>FFB Production (m/tan)</td><td>48,121</td><td>25,919</td></tr><tr><td>Baseline (kwh/mtan FFB)</td><td>5.82</td><td>5.5</td></tr></table>	Flemington Estate – Year 2024				Estimate	To date Usage	Diesel Usage (Liter)	439,202.00	362,831.10	FFB Production (m/tan)	23,251.68	20,766.17	Baseline (L/mtan FFB)	18.89	17.47	Sabak Bernam Estate – Year 2024				Estimate	To date Usage	Diesel Usage (Liter)	131,040	55,960	FFB Production (m/tan)	48,121	25,919	Baseline (L/mtan FFB)	2.72	2.16	Flemington Estate – Year 2024				Estimate	To date Usage	Electric usage (kwh)	47,250.00	29,038.50	FFB Production (m/tan)	23,251.68	20,766.17	Baseline (L/mtan FFB)	2.032	1.40	Sabak Bernam Estate – Year 2024				Estimate	To date Usage	Electric usage (kwh)	280,000	144,666	FFB Production (m/tan)	48,121	25,919	Baseline (kwh/mtan FFB)	5.82	5.5	
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4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Verified during the audit, both audited estates did not practice any renewable energy in their operations.	Complied																		
Criterion 4.5.3: Waste management and disposal																					
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<div>All waste and pollution are identified and documented in the Waste Management Action Plan (WMP). Details of waste generated from the estates operations among others as shown below. Sighted the evidence:</div> <div><ul style="list-style-type: none"><li>Document: Waste Management Plan (WMP)</li><li>Date: FY 2024</li></ul></div> <table><tr><th>Waste category</th><th>Types</th><th>Source</th></tr><tr><td>Domestic waste</td><td><div>- Rubbish</div><div>- Scrap metal</div><div>- Used tyres</div><div>- Sewage</div></td><td><div>- Workers housing</div><div>- Office</div><div>- Workshop</div><div>- Store</div><div>- Shop</div></td></tr><tr><td>Industrial waste</td><td>Scrap metal</td><td>workshop</td></tr><tr><td>Scheduled waste</td><td><div>- Used lubricant container</div><div>- Pesticide/Chemical Container</div><div>- Spent Chemical (Lab)</div></td><td><div>- Workshop</div><div>- Chemical store</div></td></tr><tr><td>Clinical Waste</td><td>- Clinical wastes</td><td>- Estate Clinic</td></tr><tr><td>Recycle waste</td><td><div>- Empty pesticide containers</div><div>- Re-use empty container</div><div>- Re-use fertilizer bags</div><div>- EFB</div></td><td><div>- Chemical store</div><div>- General store</div></td></tr></table>	Waste category	Types	Source	Domestic waste	<div>- Rubbish</div> <div>- Scrap metal</div> <div>- Used tyres</div> <div>- Sewage</div>	<div>- Workers housing</div> <div>- Office</div> <div>- Workshop</div> <div>- Store</div> <div>- Shop</div>	Industrial waste	Scrap metal	workshop	Scheduled waste	<div>- Used lubricant container</div> <div>- Pesticide/Chemical Container</div> <div>- Spent Chemical (Lab)</div>	<div>- Workshop</div> <div>- Chemical store</div>	Clinical Waste	- Clinical wastes	- Estate Clinic	Recycle waste	<div>- Empty pesticide containers</div> <div>- Re-use empty container</div> <div>- Re-use fertilizer bags</div> <div>- EFB</div>	<div>- Chemical store</div> <div>- General store</div>	Complied
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Industrial waste	Scrap metal	workshop																			
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Clinical Waste	- Clinical wastes	- Estate Clinic																			
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		Sewage	- Septic tank	- Housing Complex	
		<ul style="list-style-type: none"> <li>Document: Inventory of Schedule Waste</li> <li>Date: 31/07/2024</li> </ul> <p>Inventory of schedule waste well recorded in Fifth Schedule and duly documented as follows:</p> <p><u>Flemington Estate</u></p> <ul style="list-style-type: none"> <li>SW 305 – Spent Lubricating Oil balance 0.0300 m.tan</li> <li>SW 404 – Clinical Waste balance 0.0001 m.tan</li> <li>SW 409 – Contaminated PPE balance 0.0001 m.tan</li> <li>SW 409 – Empty Container/drums/bags balance 0.0200 m.tan</li> <li>SW 410 – Paper, Oil Filter &amp; Rags balance 0.3500 m.tan</li> </ul> <p><u>Sabak Bernam Estate</u></p> <ul style="list-style-type: none"> <li>SW 404 – Clinical Waste balance 0.0010 m.tan</li> <li>SW 409 – Inner fertilizer balance 0.0108 m.tan</li> <li>SW 409 – Empty Container/drums/bags balance 0.0025 m.tan</li> <li>SW 410 – Contaminated PPE 0.01 m.tan</li> </ul>			
<b>4.5.3.2</b>	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into	<p>The management has developed a waste management plan (WMP) to ensure the waste generated in the estate is well manage. The waste product and waste pollution has been identified. Sighted the followings evidence:</p> <ul style="list-style-type: none"> <li>Document 1: Waste Management Plan (WMP) FY 2024</li> </ul>			Complied

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Criterion / Indicator		Assessment Findings	Compliance						
	value-added by-products <b>- Major compliance -</b>	<ul style="list-style-type: none"><li>Document 2: Inventory of Schedule Waste dated 31/07/2024</li></ul> Verified the implementation of recycling waste and potential waste converted into value added by product. Sighted the evidence: <ul style="list-style-type: none"><li>Recycling waste<ul style="list-style-type: none"><li>Empty container: reused for spraying activity</li><li>Fertilizer bag: reused for loose fruit collection activity</li></ul></li><li>Potential waste<ul style="list-style-type: none"><li>EFB: use as organic fertilizer</li></ul></li></ul> Frond: user as organic fertilizer							
4.5.3.3	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. <b>- Major compliance -</b>	<p>The procedure of Schedule waste management has been established. Refer Waste Management Procedure for Estates &amp; Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01.</p> <p>Other reference made was Guidelines for Packaging, Labelling and Storage of Scheduled Wastes in Malaysia. During site visit to schedule waste store.</p> <p>It was sighted the implementation and practices as below:</p> <ul style="list-style-type: none"><li>Signboard of schedule waste store</li><li>Safety signages are available and displayed</li><li>Labelling of each schedule waste and date generated</li><li>PPE provided by the company</li><li>Spillage kit available</li></ul> <p>Verified disposal of Scheduled waste as per below:</p> <table><tr><td colspan="2">Flemington Estate</td></tr><tr><td>Document</td><td>Consignment Note for Scheduled Waste</td></tr><tr><td>Consignment Note No.</td><td>2024073118043RZ</td></tr></table>	Flemington Estate		Document	Consignment Note for Scheduled Waste	Consignment Note No.	2024073118043RZ	Complied
Flemington Estate									
Document	Consignment Note for Scheduled Waste								
Consignment Note No.	2024073118043RZ								

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Criterion / Indicator		Assessment Findings		Compliance
		Date	31/07/2024	
		Contractor	PenXXX FXXXX (Ipoh) Sdn Bhd	
		Waste code	SW 305 Spent Lubricating Oil	
		Quantity	0.05000 metric tonne	
		Sabak Bernam Estate		
		Document	Consignment Note for Scheduled Waste	
		Consignment Note No.	2024052316JX2ZCO	
		Date	29/07/2024	
		Contractor	EdXXXXX MedXXXXXX Sdn Bhd	
		Waste code	• SW 404 – Clinical Waste	
		Quantity	0.0016 metric tonne	
		Disposal of scheduled waste related to vehicle maintenance and servicing agreed as follows:		
		i. Kubota Malaysia Sdn Bhd – approval letter by Jabatan Alam Sekitar dated 13/4/2022.		
		Verified:		
		- Bring back Scheduled waste Form		
		- Serial no: 1665		
		- Date: 26/04/2024		
		- Scheduled waste:		
		• Spent lubricating oil (SW 305) – 146 litres		
		• Used oil filters (SW 410) – 8 pcs		
• Used Rags (SW 410) – 21 pcs				

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Criterion / Indicator		Assessment Findings	Compliance
		<p>ii. Sime Darby Industrial Sdn Bhd - – approval letter by Jabatan AXXX SeXXXXX dated 6 September 2011.</p> <p>Verified:</p> <ul style="list-style-type: none"> <li>- Scheduled waste Delivery Form</li> <li>- Serial no: 5161</li> <li>- Date: 06/02/2024</li> <li>- Scheduled waste: <ul style="list-style-type: none"> <li>• Spent lubricating oil (SW 305) – 126 litres</li> <li>• Used oil filters (SW 410) – 18 pcs</li> <li>• Used Rags (SW 410) – 15 pcs</li> </ul> </li> </ul>	
<b>4.5.3.4</b>	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>SD Guthrie Berhad has established the Standard Operation Procedure for Schedule Waste Management. This is to ensure the proper of handling schedule waste from storage until disposal.</p> <p>The SOP has included the triple rinsing procedures and the relevant training to be conducted. Under the operational control procedure established as given in 6.6.1.1 above the guideline and practice for handling empty pesticides containers are as follows.</p> <ol style="list-style-type: none"> <li>a. All class 2 and above containers are tripled rinsed, and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste.</li> <li>b. Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.</li> <li>c. Empty containers were tripled rinsed, punctured, and delivered as SW 409.</li> <li>d. Other used of recycled chemical containers for spraying purposes.</li> </ol>	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		The estates also maintained records of empty pesticide containers where it will be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health.	
<b>4.5.3.5</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. <b>- Minor compliance -</b>	Domestic waste was disposed of according to the waste management plan. Sighted the evidence: Document: Contract Agreement between FAME Transportation and Estate management Collection: 3 times for every week and stored in waste bin Observation: The wastes was collected by Majlis Perbandaran Teluk Intan	Complied
<b>Criterion 4.5.4:</b> Reduction of pollution and emission			
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	An assessment of polluting activity was conducted for greenhouse gas emissions calculation. The emission sources included: manufacture, transport and use of fertilizer, nitrous oxide resulting from the field application of fertilizer, crop sequestration, fossil fuel used in the field (harvesting, collecting FFB).	Complied
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	The management has established the Pollution Prevention Plan laid out an action plan for; 1. To minimize soil erosion during replanting 2. To comply with EQA (Scheduled Waste) Reg 2005 3. To ensure the activities do not pollute the environment 4. To ensure no open burning at the workers' housing complex area 5. To ensure pesticide/herbicide usage at an optimum level	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
Criterion 4.5.5: Natural water resources															
4.5.5.1	<p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <p>a. Assessment of water usage and sources of supply.</p> <p>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.</p> <p>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p><b>- Major compliance -</b></p>	<p>SD Guthrie Berhad estate’s had established its Water Management Plan for year 2024 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <p>1) Implementation of rain water harvest</p> <p>2) Construction of water gate for effective management of field drains</p> <p>3) Establishment of <i>Mucuna bracteata</i> to prevent erosion</p> <p>4) Side drain at field road to control water, frond stacking</p> <p>5) Enhancement of ground vegetation at bare ground area.</p> <p>a) The water sources are as shown below;</p> <table><tr><th>Source</th><th>Usage</th><th>Monitoring &amp; measurement</th></tr><tr><td>Lembaga Air Perak</td><td>Purchased for domestic consumption</td><td>Monitoring water supply</td></tr><tr><td>Rain water</td><td>Domestic use Workshop Chemical mixing</td><td>Rain fall data</td></tr><tr><td>Water tank</td><td>Emergency water supply</td><td>Monitor utilization/ stock</td></tr></table> <p>The Estates had implemented water managements plans which covered:</p> <p>a) Water shortage contingencies</p>	Source	Usage	Monitoring & measurement	Lembaga Air Perak	Purchased for domestic consumption	Monitoring water supply	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	Water tank	Emergency water supply	Monitor utilization/ stock	Complied
Source	Usage	Monitoring & measurement													
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Water tank	Emergency water supply	Monitor utilization/ stock													

Criterion / Indicator		Assessment Findings	Compliance									
		<p>b) Water pollution prevention</p> <p>c) Reduce wastage</p> <p>d) Identification &amp; management of waste waters</p> <p>e) Monitoring rainfall</p> <p>f) Regular water quality analysis.</p> <p>The estates monitor the rainfall data on daily basis for water management for the crop growth and catchment purposes and own treatment where required. Annual records as shown below;</p> <table><tr><td>Estate</td><td>Sabak Bernam</td><td>Flemington</td></tr><tr><td>Volume /mm</td><td>3376</td><td>2710</td></tr><tr><td>Days of rain</td><td>147</td><td>134</td></tr></table> <p>Water management plan review date was sighted and verified with NIL changes as follows:</p> <p>a) Sabak Bernam Estate - 05/01/2024</p> <p>b) Flemington Estate – 10/01/2024</p> <p>b) The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SD Guthrie Berhad policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Reclassification of</p>	Estate	Sabak Bernam	Flemington	Volume /mm	3376	2710	Days of rain	147	134	
Estate	Sabak Bernam	Flemington										
Volume /mm	3376	2710										
Days of rain	147	134										

Criterion / Indicator		Assessment Findings				Compliance																																																																											
		<p>conservation set aside (CSA) for Upstream Operations dated 31/05/2019. The buffer zones established are as follows:</p> <p>The signboards were displayed accordingly at the site where applicable. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:</p> <p>a) Sabak Bernam Estate - Sg Bernam River Reserve</p> <p>b) Flemington Estate - Bund of Bernam River</p> <table><tr><td>River width</td><td>Buffer zone</td><td></td><td>River width</td><td>Buffer zone</td></tr><tr><td>&gt; 40 m</td><td>50 m</td><td></td><td>5 - 10 m</td><td>10 m</td></tr><tr><td>20 - 40 m</td><td>40 m</td><td></td><td>&lt; 5 m</td><td>5 m</td></tr><tr><td>10 - 20 m</td><td>20 m</td><td>-</td><td></td><td>-</td></tr><tr><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Parameter</td><td>Standard</td><td></td><td>Parameter</td><td>Standard</td></tr><tr><td>pH</td><td>6-9</td><td></td><td>SS</td><td>50</td></tr><tr><td>BOD</td><td>3</td><td></td><td>AN</td><td>0.3</td></tr><tr><td>COD</td><td>25</td><td></td><td>DO</td><td>5-7</td></tr><tr><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Parameter</td><td>Standard</td><td></td><td>Parameter</td><td>Standard</td></tr><tr><td>Aldrin</td><td>0.02 ppb</td><td></td><td>Heptachlor</td><td>0.05 ppb</td></tr><tr><td>Dieldrin</td><td>0.02 ppb</td><td></td><td>lindane</td><td>2 ppb</td></tr><tr><td>t-DDT</td><td>0.1 ppb</td><td></td><td>endosulfan</td><td>10 ppb</td></tr><tr><td>BHC</td><td>2 ppb</td><td></td><td>Chlordane</td><td>0.08 ppb</td></tr></table> <p>Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for detection of fertilizer application</p>				River width	Buffer zone		River width	Buffer zone	> 40 m	50 m		5 - 10 m	10 m	20 - 40 m	40 m		< 5 m	5 m	10 - 20 m	20 m	-		-						Parameter	Standard		Parameter	Standard	pH	6-9		SS	50	BOD	3		AN	0.3	COD	25		DO	5-7						Parameter	Standard		Parameter	Standard	Aldrin	0.02 ppb		Heptachlor	0.05 ppb	Dieldrin	0.02 ppb		lindane	2 ppb	t-DDT	0.1 ppb		endosulfan	10 ppb	BHC	2 ppb		Chlordane	0.08 ppb	
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Criterion / Indicator		Assessment Findings	Compliance
		<p>effect to the water courses. Parameters monitored as shown above. The management plan taken among others as shown below:</p> <ul style="list-style-type: none"> <li>a) Regular inspection at buffer/HCV areas</li> <li>b) Monitor water from surrounding areas</li> <li>c) Track, measure and report all activities around river</li> <li>d) Train and educate workers.</li> </ul> <p>The following water analysis results (made on quarterly basis) were sighted and verified.</p> <ul style="list-style-type: none"> <li>a) Sabak Bernam Estate – 09/07/2024</li> <li>b) Flemington Estate - 25/07/2024 and 20/05/2024</li> </ul> <p>The sampling sites taken as follows. There were no major issues on the water quality. Variation if any is investigated as per the SOP.</p> <ul style="list-style-type: none"> <li>a) Sabak Bernam Estate - P19C/19H/20E/13B</li> <li>b) Flemington Estate Upstream - WG1/WG3/Drain</li> </ul> <p>All employees including workers in the estates use the same source of clean water i.e LAP. No bore well used as water source.</p>	
4.5.5.2	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p><b>- Minor compliance -</b></p>	No construction of bund, weirs and dams across waterways passing through the estates.	Complied
4.5.5.3	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p><b>- Minor compliance -</b></p>	<p>The management has continued the practice of optimized the usage of water and reduce of wastage. It has view during audit where is implemented in the estate such as:</p> <p>Action plan 1: To collect the rainwater by water tank at housing area</p>	Complied

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		& mixing chemical area. Action plan 2: To Repair if any leakage at housing area Action plan 3: To reused wastewater in sump for reused for pre mixing During site visit, there is roadside drain has been implemented in the estate for water harvesting practices.	
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>			
<b>4.5.6.1</b>	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p><b>- Major compliance -</b></p>	<p>a) The HCV re-assessment was compiled by RHSE – Regional Health Safety Environment team on Sept 2016 for Estates of SOU 04. Thereafter being reviewed on July 2020. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <p>i) Overview of HCV assessment</p> <p>ii) Description of assessment area</p> <ul style="list-style-type: none"> <li>- Landscape context</li> <li>- Biodiversity &amp; conservation values</li> <li>- Ecosystem service / social &amp; cultural values</li> </ul> <p>iii) HCV criteria &amp; application to agriculture</p> <ul style="list-style-type: none"> <li>- Visual observation &amp; supporting information</li> <li>- Wildlife in plantation</li> <li>- Decision on HCV status</li> </ul> <p>iv) HCV management / Monitoring.</p> <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																																
		<p>identified areas are also detailed therein. The HCV areas presence as identified by the estates within SOU 04 are given below;</p> <table border="1"> <thead> <tr> <th>Area</th><th>Site</th><th>Ha</th><th>Type</th></tr> </thead> <tbody> <tr> <td>Bund Bernam River</td><td>FE</td><td>0.20</td><td>HCV 4</td></tr> <tr> <td>Mill Water Catchment</td><td>FE</td><td>7.18</td><td>HCV 4</td></tr> <tr> <td>Bund Perak River</td><td>BDE</td><td>2.00</td><td>HCV 4</td></tr> <tr> <td>Bernam River Reserve</td><td>SBE</td><td>1.24</td><td>HCV 4</td></tr> <tr> <td>Sg Erong/Sg Chawang/Sg Dua Reserve</td><td>SSE</td><td>7.32</td><td>HCV 4</td></tr> <tr> <td>Pond</td><td>SSE</td><td>0.49</td><td>HCV 4</td></tr> <tr> <td>Total</td><td></td><td>18.43</td><td></td></tr> </tbody> </table> <p>All areas were sighted and verified. Hectare for the re-categorized areas has not affected the others category including the planted areas. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.</p> <p>b) No RTE species identified in the estates visited as per Addendum to High conservation value, Final Report for Strategic Operating Unit 4, ver. 2.0 dated July 2020.</p>	Area	Site	Ha	Type	Bund Bernam River	FE	0.20	HCV 4	Mill Water Catchment	FE	7.18	HCV 4	Bund Perak River	BDE	2.00	HCV 4	Bernam River Reserve	SBE	1.24	HCV 4	Sg Erong/Sg Chawang/Sg Dua Reserve	SSE	7.32	HCV 4	Pond	SSE	0.49	HCV 4	Total		18.43		
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<b>4.5.6.2</b>	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <ul style="list-style-type: none"> <li>Ensuring that any legal requirements relating to the protection of the species are met.</li> </ul>	<p>The management has established the HCV Report to identify the value habitat ecosystem in the estate. The method of assessment has activities such interview with stakeholder, site visit on the field ground, observation of animal habitat. Management also discourages any illegal of hunting, fishing or collecting activities as measure for resolve human wildlife conflict. Sighted the evidence:</p>	Complied																																

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Criterion / Indicator		Assessment Findings		Compliance
	<ul style="list-style-type: none"> <li>Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</li> </ul> <p><b>- Major compliance -</b></p>	Discouraging of activities to protect the HCV Area: <ul style="list-style-type: none"> <li>Installation signboard No Hunting</li> <li>Installation signboard No Fishing</li> <li>Installation signboard No Swimming</li> <li>Installation signboard Prohibited Area.</li> </ul>		
<b>4.5.6.3</b>	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. <p><b>- Major compliance -</b></p>	The established HCV management plan as per below: Action steps	Action Plan	Complied
		Inspection of HCV	Continuous inspection and recommendation To liaise with related agency	
		Protection or conservation & monitoring of biodiversity area.	To continuously collaborate with R& D to monitor the status & health of trees	
		Protection & conservation of mangrove forests area.	To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.	
		Rehabilitation & habitat enhancement	To participate in tree planting divers tree species to enhance the surrounding biodiversity.	
		Interface with animals	Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with <i>Jabatan Perhilitan</i> on wildlife encounter/discovery	



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		Education and awareness	Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/ no hunting/ no swimming	
<b>Criterion 4.5.7: Zero burning practices</b>				
<b>4.5.7.1</b>	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. <b>- Major compliance -</b>	SD Guthrie Berhad has established the Group Sustainability & Quality Policy related to Zero Open Burning as referred to in the Responsible Agriculture Charter revised 2020. The statement as the following: Under 3.2.5 - Zero use of fire for land preparation and establish effective monitoring and prevention as well as proactive firefighting measure within reasonable radius beyond our operational boundary		Complied
<b>4.5.7.2</b>	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. <b>- Major compliance -</b>	No special approval from the relevant authorities has been made to date. As mentioned by the company's representative should controlled burning be required, an official letter of approval shall be obtained.		Not Applicable
<b>4.5.7.3</b>	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. <b>- Major compliance -</b>	Since no special approval has been obtained, this requirement is not applicable.		Not Applicable
<b>4.5.7.4</b>	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. <b>- Minor compliance -</b>	The requirement is included in the scope of work orders in the land preparation during replanting, of which it is a standard practice in SD Guthrie Berhad.		Complied

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		However, there are variations of practices between inland and coastal estates. Trunks are felled and chipped without having to shred and windrowed in certain conditions. Adjustment of work requirement are finalized from the directive of the replanting unit and the Region office.	
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - <b>Major compliance</b> -	<p>Standard Operating procedure has been addressed in the Sustainability Management Procedure Manual, Standard Operating Procedures (SOP) and The Oil Palm Manual.</p> <p>The manual covering the activity for future replanting, oil palm nursery practices, planting techniques, soil conservation and terracing, pest, and diseases, weed management, manuring of oil palm, immaturity, harvesting, crop forecasting and managing difficult soils. All the activities have been described comprehensively in the Standard operating procedure (SOP) and pictorial SOP. The estate implemented the SOPs through its daily operations.</p> <p>Monitoring of audited estates operations verified through:</p> <ul style="list-style-type: none"> <li>- Performance Monitoring Visit Summary Report dated 05/07/2024 (Twice a year)</li> <li>- Estate Structured Crop Recovery Assessment Report (SCRA) dated 19/06/2024 (Quarterly)</li> </ul> <p>Interview with workers and stakeholders confirmed that the SOP had been implemented and they understood the requirements of the SOP,</p>	Complied

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		the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment. <ul style="list-style-type: none"><li>• Agriculture Reference Manual</li><li>• SOP – operations such as harvesting, manuring, spraying etc.</li></ul>													
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. <b>- Major compliance -</b>	The management emphasized on the appropriate soil conservation measures as addressed in the followings: <ul style="list-style-type: none"><li>• SD Guthrie Berhad Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019.</li><li>• Responsible Agriculture Charter under section 3.1 Protect and conserve biodiversity and ecosystems stated as follows:<ul style="list-style-type: none"><li>- 3.1.2 - Management of erosion by protection of steep slopes and river reserves within our operations and promote restoration programs”.</li></ul></li><li>• Stated in the Environment Plan FY 2024, Do not fill area more than 25 degree and marking/signage to be established at slope area &gt;25 degree.</li></ul>	Complied												
4.6.1.3	A visual identification or reference system shall be established for each field. <b>- Major compliance -</b>	Visual identification has been established for each field and divided into divisions and blocks. Each block is named by visual identification (field marker) erected for reference. Sighted and verified sampled as follows: <table><tr><td colspan="2">Flemington Estate</td></tr><tr><td>Field No</td><td>2017 A</td></tr><tr><td>Hectarage</td><td>90.35</td></tr><tr><td>Year of Planting</td><td>2017</td></tr></table> <table><tr><td colspan="2">Sabak Bernam Estate</td></tr><tr><td>Field No</td><td>219 F</td></tr></table>	Flemington Estate		Field No	2017 A	Hectarage	90.35	Year of Planting	2017	Sabak Bernam Estate		Field No	219 F	Complied
Flemington Estate															
Field No	2017 A														
Hectarage	90.35														
Year of Planting	2017														
Sabak Bernam Estate															
Field No	219 F														

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		Hectarage	42.77																																								
		Year of Planting	2019																																								
Criterion 4.6.2: Economic and financial viability plan																																											
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. <b>- Major compliance -</b>	The management have established 5 years business plan as a guide for daily estate operations. Sighted the 5-year business plan is available for verification. The business plan contains Total mature ha, Estimated FFB Price/mt, Yield Per Hectare, Estimated FFB/mt, Upkeep & Maintenance, Harvesting, General Charges, Income and Profit Loss. <ul style="list-style-type: none"><li>Document: Management Plan - Budget</li><li>Year Plan: 2024 – 2028</li></ul>					Complied																																				
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. <b>- Major compliance -</b>	The SOU 4 audited estates have established a 5 – year replanting program as verified below: <table><tr><th colspan="6">Flemington Estate</th></tr><tr><td>Year</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Ha</td><td>0.00</td><td>104.20</td><td>0.00</td><td>0.00</td><td>94.07</td></tr></table> <table><tr><th colspan="6">Sabak Bernam Estate</th></tr><tr><td>Year</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2025</td></tr><tr><td>Ha</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr></table>					Flemington Estate						Year	2024	2025	2026	2027	2028	Ha	0.00	104.20	0.00	0.00	94.07	Sabak Bernam Estate						Year	2024	2025	2026	2027	2025	Ha	0.00	0.00	0.00	0.00	0.00	Complied
Flemington Estate																																											
Year	2024	2025	2026	2027	2028																																						
Ha	0.00	104.20	0.00	0.00	94.07																																						
Sabak Bernam Estate																																											
Year	2024	2025	2026	2027	2025																																						
Ha	0.00	0.00	0.00	0.00	0.00																																						
4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast	The management have established 5 years business plan as a guide for daily estate operations. Sighted the 5-year business plan is available for verification. The business plan contains Total mature ha, Estimated FFB Price/mt, Yield Per Hectare, Estimated FFB/mt, Upkeep & Maintenance, Harvesting, General Charges, Income and Profit Loss. <ul style="list-style-type: none"><li>Document: 5-year Business Management Plan</li></ul>					Complied																																				

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Criterion / Indicator		Assessment Findings						Compliance																								
	e) Financial indicators: cost benefit, discounted cash flow, return on investment <b>- Major compliance -</b>	<ul style="list-style-type: none"><li>Year: 2024 – 2028</li><li>Area covers</li></ul> <table><tr><th colspan="6">FLEMINGTON AND SABAK BERNAM ESTATES</th></tr><tr><th>Description</th><th>2024</th><th>2025</th><th>2026</th><th>2027</th><th>2028</th></tr><tr><td>Mature Ha</td><td colspan="5" rowspan="7">Document verified. However, due to confidentiality all figures cannot be reveal as part of report evidence.</td></tr><tr><td>Immature Ha</td></tr><tr><td>FFB Tons</td></tr><tr><td>Yield/Ha</td></tr><tr><td>OER</td></tr><tr><td>KER</td></tr><tr><td>Cost/Ton FFB</td></tr></table>						FLEMINGTON AND SABAK BERNAM ESTATES						Description	2024	2025	2026	2027	2028	Mature Ha	Document verified. However, due to confidentiality all figures cannot be reveal as part of report evidence.					Immature Ha	FFB Tons	Yield/Ha	OER	KER	Cost/Ton FFB	
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KER																																
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4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. <b>- Major compliance -</b>	<p>The management plan was effectively implemented, and the achievement of the goals and objectives were regularly monitored, documented and reviewed through the followings:</p> <ul style="list-style-type: none"><li>Monthly Progress Reports,</li><li>Monthly Accounts Reports,</li><li>Annual Financial Reports,</li><li>Agronomist Visit Reports (Twice a year)</li><li>HSE Flyby Visit (Twice a year)</li><li>Internal Audit Report.</li></ul>						Complied																								
Criterion 4.6.3: Transparent and fair price dealing																																

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Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.6.3.1</b> Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p><b>- Major compliance -</b></p>	<p>The management has established pricing mechanism and conducted as per contract agreement with contractors.</p> <p>Review on the contract agreement, sighted pricing of the job task is available. Sampled contract/Letter of Award to contractors as follows for:</p> <p><u>Flemington Estate</u></p> <p>1. Letter of Extension for FFB Transportation Services for Sime Darby Plantation Berhad's Estates dated 20/03/2022 to Fxxx Txxxxxxxxxxxxx Sdn Bhd. The contract valid from 01/04/2024 to 31/12/2024 signed by both parties on 27/03/2024. The rate of payment has been elaborated in the agreement, Appendix 1 under Schedule of Transport Rates ("Transport Rates"). Evident of invoice (invoice no: FTSB-JUN24-012, contract form:4300676719) dated 02/07/2024 is available for the payment of July.</p> <p><u>Sabak Bernam Estate</u></p> <p>Sighted the Supplemental Agreement for FFB Transportation Services for Sime Darby Plantation Berhad's Estates, effective dated 01/01/2024 to Axxxx Mxxx Axxxxxxx Sdn Bhd with validity one year after effective date and was signed by both parties on 01/01/2024. The rate of payment has been elaborated in the agreement, clause II (c) under Schedule of Transport Rates to Main Oil Mill(s). Evident the payment advice, Doc No: 4300679626 dated 05/08/2024 to Axxxx Mxxx Axxxxxxx Sdn Bhd was available for the payment of July.</p>	<p>Complied</p>
<p><b>4.6.3.2</b> All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p><b>- Major compliance -</b></p>	<p>The company has established pricing mechanism and conducted as per contract agreement with contractors.</p>	<p>Complied</p>

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		<p>Review on the contract agreement, sighted pricing of the job task is available. Payment terms for contract work were stated in the contract agreement as briefed in 4.6.3.1.</p> <p>Onsite stakeholder consultation with contractors informed their payments were made as per payment terms stated in the contracts. No delayed of payments recorded.</p>	
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p><b>- Major compliance -</b></p>	<p><u>Flemington Estate</u></p> <p>The estate management has conducted the briefing for MSPO requirement on the contractor Fxxx Txxxxxxxxxxxxx Sdn Bhd. The briefing was conducted on 30/05/2024. Sighted the training record "Briefing to Vendor and Supplier regarding RSPO/MSPO/ILO/SDP Policy/VCOCB"</p> <p>The contractor needs to follow MSPO guideline in accordance with the Sime Darby Plantation Berhad. In addition, contract has specified the following revised requirement among others such as:</p> <ul style="list-style-type: none"> <li>• All contractors engaged by estates were bound to understand and comply to their contractual agreements that includes MSPO requirements through signing of Vendor Integrity Pledge (VIP) which enable accredited CB to audit them.</li> <li>• Vendor Code of Business Conduct (COBC)</li> <li>• The contractor shall upon request by the Company allow certification bodies access to audit the Contractors premise or operations if deemed necessary.</li> </ul>	Complied
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor.	<u>Flemington Estate</u>	Complied

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	- <b>Major compliance</b> -	<p>Sighted the contractor Fxxx Txxxxxxxxxxxxx Sdn Bhd that is provides services for FFB Transportation. Sighted the Letter of Extension dated 20/03/2024, with validity from 01/04/2024 to 31/12/2024.</p> <p><u>Sabak Bernam Estate</u></p> <p>Sighted the contractor Axxxx Mxxx Axxxxxxx Sdn Bhd that is provides services for FFB Transportation. Sighted the Supplemental Agreement that was signed on 01/01/2024 (effective date), with validity one year after effective date.</p>	
<b>4.6.4.3</b>	<p>The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.</p> <p>- <b>Minor compliance</b> -</p>	<p><u>All sample estate</u></p> <p>This requirement has been specified and explained during the stakeholder meeting which includes the presence of Contractors and vendors. All Contractors/Vendors need to follow MSPO guideline in accordance with the Sime Darby Plantation Berhad. Sighted the memo of Acceptance of Audit from Manager, Central West Region, Sime Darby Berhad to all suppliers and contractor dated 04/03/2024. Based on the letter clause (iv), the suppliers and contractors are required to "Provide access to the RSPO/ISCC/MSPO/SCCS auditors to contractors' operation site(s) and employees whenever deemed necessary". Sighted the letter was signed by both parties.</p> <p>The contractor has also signed the Vendor Integrity Pledge (VIP) which require contractor to comply with labour and human rights, environment, safety and health, ethic and management practice and regulation relating to anti-bribery, fraud and corruption. Based on the Vendor COBC document, it was sighted in the clause 4 "...We have the right to audit Vendors to verify compliance with this Vendor COBC and/or with the requirement set out in the third-party agreement to permit ongoing assessment risk..."</p>	Complied



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<b>4.6.4.4</b>	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - <b>Major compliance</b> -	<u>All sample estate</u> All works performed at the estates are checked and verified by the estate's personnel. Projects where tenders are issued by HQ are checked by representatives from HQ	Complied
<b>4.7 Principle 7: Development of new planting</b>			
<b>Criterion 4.7.1: High biodiversity value</b>			
<b>4.7.1.1</b>	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - <b>Major compliance</b> -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
<b>4.7.1.2</b>	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - <b>Major compliance</b> -	No new planting within SOU4Group estates. Thus, this indicator is not applicable.	Not applicable
<b>Criterion 4.7.2: Peat Land</b>			
<b>4.7.2.1</b>	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable

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	- Major compliance -		
<b>Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)</b>			
<b>4.7.3.1</b>	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
<b>4.7.3.2</b>	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
<b>4.7.3.3</b>	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
<b>4.7.3.4</b>	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
<b>Criterion 4.7.4: Soil and topographic information</b>			
<b>4.7.4.1</b>	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable

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	- Major compliance -		
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
<b>Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils</b>			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
<b>Criterion 4.7.6: Customary land</b>			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable

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	- <b>Major compliance</b> -		
<b>4.7.6.2</b>	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - <b>Minor compliance</b> -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
<b>4.7.6.3</b>	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - <b>Major compliance</b> -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
<b>4.7.6.4</b>	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - <b>Major compliance</b> -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
<b>4.7.6.5</b>	Identification and assessment of legal and recognised customary rights shall be documented. - <b>Major compliance</b> -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
<b>4.7.6.6</b>	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - <b>Major compliance</b> -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable
<b>4.7.6.7</b>	The process and outcome of any compensation claims shall be documented and made publicly available. - <b>Major compliance</b> -	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.7.6.8</b>	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. <b>- Minor compliance -</b>	No new planting within SOU4 Group estates. Thus, this indicator is not applicable.	Not applicable

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**MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mills**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. - <b>Major compliance</b> -	Sighted Group Sustainability & Quality Policy Statement dated 02/12/2019 signed by Group Managing Director Mr. Mohamad Helmi Othman Basha.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - <b>Major compliance</b> -	The policy established mentions that the management is committed to making: 1. Promoting Good Governance and Transparency 2. Contributing to a better society 3. Minimizing environmental harm 4. Delivering sustainable quality  This policy shall be guided by the commitment spelled out in the company's: a. Responsible Agriculture Charter (RAC) b. Human Right Charter (HRC)	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - <b>Major compliance</b> -	RSPO + MSPO Internal Audit for SOU 4 was carried out on 21/05/2024. The audit was carried out based on the reference of MS 2530-3:2013 and MS 2530-4:2013. Noticed the summary of finding was categorized under NC major, NC Minor and OFI.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Seen the Internal Audit Report with root cause identified for the nonconformities and OFIs raised. All the non-conformities were closed accordingly except for one (1) outstanding NC which yet to be closed by the internal auditor.	
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. <b>- Major compliance -</b>	The management has developed an Internal Audit Procedure, Doc. No.: SD/SDP/PSQM/IAP, version 4 dated April 2024. The frequency of the internal audit shall be carried out at least once a year and when required.  Seen the Internal Audit Report with root cause identified for the nonconformities and OFIs raised. All the non-conformities were closed accordingly except for one (1) outstanding NC which yet to be closed by the internal auditor.	Complied
<b>4.1.2.3</b>	Reports shall be made available to the management for their review. <b>- Major compliance -</b>	The internal audit report has been distributed to the mill's management. Management review meeting was conducted to review the findings of the internal audit.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. <b>- Major compliance -</b>	SD Guthrie berhad (formerly known as Sime Darby Plantation Berhad) has established SOP for Management Review documented in Standard Operation Manual, Sub-Section 5.6, dated: 25/05/2015. Management review carried out at least once a year after the internal audit. The latest meeting was done on 10/06/2024 and has discussed the pertinent elements with regards to:  i) Matters arising from previous meeting ii) Changes in regulations, standards, policies & procedures in relation to sustainability management system iii) Review on operation performance & product conformity	Complied

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Criterion / Indicator		Assessment Findings	Compliance																		
		iv) Review on management plan v) Results from system audits and assessment vi) Other assessment vii) Stakeholder feedback and complaints viii)Resources for system implementation ix) Continual improvement plan																			
Criterion 4.1.4 – Continual Improvement																					
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	<div>The continual improvement plan includes environmental, occupational health and safety, and operation improvement. Sighted the Continual Improvement Plan for Flemington POM FY 2024. Among gazetted CAPEX:</div> <table><tr><td>Flemington POM</td><td></td></tr><tr><td>Operations</td><td>1unit 40mt Boiler RM14M</td></tr><tr><td>Operations</td><td>Steam Turbine RM1.80M</td></tr><tr><td>Operations</td><td>SORS system - technical grade oil RM1.3M</td></tr><tr><td>Operations</td><td>2 units new sterilizers RM2.4M</td></tr><tr><td>Operations</td><td>New cages 18 units RM600K</td></tr><tr><td>Security</td><td>Fencing at ETP area RM120K</td></tr><tr><td>Security</td><td>Fencing Workers quarters RM110K</td></tr><tr><td>Operation</td><td>Omega Project- RM4.6M machinery/facility</td></tr></table>	Flemington POM		Operations	1unit 40mt Boiler RM14M	Operations	Steam Turbine RM1.80M	Operations	SORS system - technical grade oil RM1.3M	Operations	2 units new sterilizers RM2.4M	Operations	New cages 18 units RM600K	Security	Fencing at ETP area RM120K	Security	Fencing Workers quarters RM110K	Operation	Omega Project- RM4.6M machinery/facility	Complied
Flemington POM																					
Operations	1unit 40mt Boiler RM14M																				
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Security	Fencing at ETP area RM120K																				
Security	Fencing Workers quarters RM110K																				
Operation	Omega Project- RM4.6M machinery/facility																				
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	This is being made upon confirmation of any new projects. Employees were briefed on any new developments in basic understanding during the weekly briefings. The management team will be informed of such developments during the monthly management meetings. Dissemination of information by the RCEO	Complied																		



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		and RGM is transacted during the monthly Managers' meetings and emails.	
<b>4.2 Principle 2: Transparency</b>			
<b>Criterion 4.2.1</b> – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	<p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p><b>- Major compliance -</b></p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/04/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill. While for procedure related for internal stakeholder was documented in the Sustainable Plantation Management System, Appendix 5, version 1 dated 01/11/2008 under section Flowchart and Procedures on Handling Internal Issues.</p> <p>Timeframe for internal and external communication to provide feedback within two weeks from the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation.</p> <p>The management have communicated the information to the relevant stakeholders during stakeholder meeting. Latest stakeholder meeting conducted on 21/06/2024.</p> <p>In addition, the management has established a mechanism as per Standard Operating Manual (SOM) said above for the relevant stakeholder to request mill information. The audit team found that request made by stakeholders has been response by the mill</p>	Complied

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		management within stipulated time frame as stated in the procedure above.	
<b>4.2.1.2</b>	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>Mill management documents related to sustainability available during the on-site audit upon request including sustainability policies, procedures, social impact assessment report, land titles, occupational safety &amp; health plan, complaints &amp; grievance records, continuous improvement plan and environmental assessments as well as management action plans.</p> <p>Furthermore, annual sustainability report, sustainability policies, Human Right Charter documents, company statement and global documents are published in the company's website; <a href="https://www.sdguthrie.com/sustainability/reports-policies-and-statements/">https://www.sdguthrie.com/sustainability/reports-policies-and-statements/</a>. The website is found accessible for public user.</p> <p>Management also have listed confidential documents such as financial statement, account statements, personal file, stock book and contract agreement.</p>	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established the Standard Operation Procedure for External Communication, specifically detailed in Appendix 5.5.3.2, version 1, dated 1/4/2008. This manual serves as a framework to systematically and effectively communicate with external interested parties regarding the estate's performance.</p> <p>As outlined in this procedure, the timeframe for external communication involves providing feedback within two weeks from the date of receipt for communications requiring direct feedback. For communications necessitating investigation, feedback is</p>	Complied

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		committed to being provided within one week of the completion of the investigative process. This structured approach ensures timely and transparent communication with external stakeholders, reflecting the company's commitment to responsiveness and accountability.	
<b>4.2.2.2</b>	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - <b>Minor compliance</b> -	At each operational unit, management has appointed Mr. Abd Ghafar bin Sulaiman (Mill Manager) in charge responsible for addressing social issues. The appointment as specified in the appointment letter and was verify by Mrs. Nik Maziah Binti Mustapha (Chief Executive Officer Northern Region) on 01/01/2023.	Complied
<b>4.2.2.3</b>	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - <b>Major compliance</b> -	A documented list of stakeholders for the year 2024 has been observed. This list was subsequently updated on 01/06/2024. Notably, the most recent meeting with stakeholders transpired on 21/06/2024, underscoring the ongoing engagement and communication with relevant parties.	Complied
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - <b>Major compliance</b> -	The management has established a Standard Operating Procedure (SOP) for traceability, which has been thoroughly documented. The primary objective of this procedure is comprehensive guidelines, ensuring the seamless and effective implementation of a sustainable supply chain for certified materials, including the delivery of products.  Sighted the evidence, document titled Sustainability Supply Chain & Traceability Procedure, referenced as SD/SDP/202401/SCCS, version: 02 effective date January 2024,	Complied

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4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	Daily inspections were conducted to ensure compliance with the traceability system. The weighbridge operator diligently entered all pertinent data into the system, which was subsequently verified by the executive at the close of each day. This verification process included a thorough review of the weighbridge records and product delivery.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. <b>- Minor compliance -</b>	The estate has appointed Assistant Engineer on 01/01/2023 to be responsible for Supply Chain Certification System as per appointment letter which state the responsible of the PIC as follows: <ul style="list-style-type: none"> <li>• Assisting Assistant on Supply Chain Certification System</li> <li>• Other related issues on SCCS</li> </ul> The mill has appointed the (Assistant Engineer) as Person Responsible for SCCS as per Appointment Letter dated 01/01/2023 signed by the Mill Manager.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. <b>- Major compliance -</b>	Daily inspections were conducted to ensure compliance with the traceability system. The weighbridge operator diligently entered all pertinent data into the system, which was subsequently verified by the executive at the close of each day. This verification process included a thorough review of the weighbridge records and product delivery.	Complied
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.	SD Guthrie Berhad have established a mechanism to ensure compliancy to legal and other requirement and documented in MQMS (Mill Quality Management System) under Standard	Complied

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<p><b>- Major compliance -</b></p>	<p>Operation Manual distributed to all operating units. Group Sustainability 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 Sime Darby Plantation Berhad, ESH Management System Manual, ESH Legal &amp; Other Requirements; Guidelines and Procedures; Document ID: SD/SDP/SQM (ESH)/001-2-2; Revision:0. Date: 01/07/2012.</p> <p>Among the License and Permits sampled were:  <u>Flemington POM</u></p> <p>i) Mill's compliance schedule under license no. 006013, ref: JAS.ATI.600-3/1/104 valid from 1/7/24 to 30/6/25. Mill processing capacity is 60 mt/hr for waterway discharge. Limit of discharge parameters are:</p> <ul style="list-style-type: none"> <li>- BOD<sub>3</sub>: 100 mg/l</li> <li>- SS: 400 mg/l</li> <li>- O&amp;G: 50 mg/l</li> <li>- AN: 150 mg/l</li> <li>- TN: 200 mg/l</li> <li>- pH (with 5 to 9)</li> <li>- Temperature (&lt; 45°C)</li> </ul> <p>ii) 3<sup>rd</sup> party environmental audits, at least once (1) a year, clause 24 of compliance schedule.</p> <p><u>2024</u></p> <p>Audit carried out by registered environmental auditors, lead auditor (EA0132). Date of assessment: 8/05/2024, No non-conformity</p>	

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		<p>raised and only 2 observations raised by the auditor. Mill has addressed the observation based on site verification.</p> <p><u>Stack sampling</u></p> <table><tr><th>Year</th><th>Stack sampling</th><th>Results vs limit</th></tr><tr><td>2024</td><td>Iso kinetic sampling by PXXXXXX Environmental (M) Sdn Bhd, dated 26/7/2024</td><td>Dust/particulate: 98.9 mg/m<sup>3</sup> vs 150 mg/m<sup>3</sup> CO: 43,51 mg/m<sup>3</sup> vs 1000 mg/m<sup>3</sup></td></tr></table> <p>iii) List of certificates of fitness</p> <table><tr><th>Registration no.</th><th>Validity period</th><th>Remarks</th></tr><tr><td>PK PMD 8703</td><td>Until 9/09/2025</td><td>Steam Boiler</td></tr><tr><td>PK PMD 80683</td><td>Until 22/01/2025</td><td>Steam Boiler</td></tr><tr><td>PK PMT 147319</td><td>Until 9/09/2025</td><td>Sterilizer</td></tr><tr><td>PK PMT 147316</td><td>Until 9/09/2025</td><td>Sterilizer</td></tr><tr><td>PK PMT 147302</td><td>Until 9/09/2025</td><td>Thermal Deaerator</td></tr></table> <p>iv) Electrical Installation License for private installation, capacity: 3,400 kW valid from 30/10/2023 – 29/10/2024.</p> <p>v) Diesel and petrol permit, serial no. A004168, ref. no.: KPDNPRKCTIN.600-2/26/84, Diesel: 16,000 liter, Petrol: 100 liter valid from 30/10/2022 – 29/10/2025</p> <p>vi) List of competent persons</p> <table><tr><th>Competent person</th><th>Validity period</th><th>Remarks</th></tr><tr><td>Certified Environmental Professional in Scheduled Waste</td><td>Certified person by 7/10/2016 by DOE</td><td>CePSWaM/01248</td></tr></table>	Year	Stack sampling	Results vs limit	2024	Iso kinetic sampling by PXXXXXX Environmental (M) Sdn Bhd, dated 26/7/2024	Dust/particulate: 98.9 mg/m <sup>3</sup> vs 150 mg/m <sup>3</sup> CO: 43,51 mg/m <sup>3</sup> vs 1000 mg/m <sup>3</sup>	Registration no.	Validity period	Remarks	PK PMD 8703	Until 9/09/2025	Steam Boiler	PK PMD 80683	Until 22/01/2025	Steam Boiler	PK PMT 147319	Until 9/09/2025	Sterilizer	PK PMT 147316	Until 9/09/2025	Sterilizer	PK PMT 147302	Until 9/09/2025	Thermal Deaerator	Competent person	Validity period	Remarks	Certified Environmental Professional in Scheduled Waste	Certified person by 7/10/2016 by DOE	CePSWaM/01248	
Year	Stack sampling	Results vs limit																															
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Competent person	Validity period	Remarks																															
Certified Environmental Professional in Scheduled Waste	Certified person by 7/10/2016 by DOE	CePSWaM/01248																															

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		Management (CePSWaM)			
		Certified Environmental Professional in the Treatment of Palm Oil Mill Effluent (CePPOME)	Certified person by 7/10/2016 by DOE	CePPOME/00040	
		Steam Engineer, 1 <sup>st</sup> Grade	087/2007	20/04/2007	
		Steam Engineer, 2 <sup>nd</sup> Grade	011/2017	12/01/2017	
		Engine driver grade 1	PK/10/EIS/01/10	15/07/2010	
		Engine driver grade 2	PK/11/EIS/02/54	28/07/2011	
		AGT-AESP	AGT379247-24	Valid until 20/12/2025	
		AGT-ES	AGT379241-24	Valid until 20/12/2025	
		vii)MPOB license no. 529874004000 valid until 1/06/2024 – 31/05/2025.			
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. <b>- Major compliance -</b>	Documented Procedures have been established and implemented; Doc No: Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008. All legal requirements were documented in the Legal and Other Requirement Register available at the estates. The register is reviewed regularly and updated as and when there are new or amended legal requirements that are applicable to the estate operations.			Complied

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<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. <b>- Major compliance -</b>	Documented procedures have been established and implemented; refer to Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008. All legal requirements were documented in the Legal and Other Requirement Register. Compliance with each applicable law and regulation is monitored by the mill. The legal register at the mill was reviewed/updated on a yearly basis / as and when needed for new updates/licenses. Sighted the document 'Summary of Compliance' available at the mill undersigned by the Top Management. The document lists the latest applicable laws and amendments, revision dates, and acknowledgment by the management.  Legal & Other requirement register (LORR) dated June 2024 has not included the new Environment Quality Act (amendment) 2024 which effective from 7/7/2024. This was not updated in the register thus a minor NC was issued.	Minor Non-Compliance
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. <b>- Minor compliance -</b>	A tracking system is available to identify changes in the relevant regulations through head office, and website information, and the information is communicated from the Group Head Office.  Sighted appointment letter for Mr XXXX, Mill Manager dated 02/01/2023 for person in charge Legal & Other Requirement Register (LORR) for Flemington POM	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	Flemington POM located within Flemington Estate land area and demonstrated with legal ownership or leases with legal documents.  The mill has ensured the oil palm milling activities do not diminish	Complied



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		the land use rights of other users. No issues of land dispute issue occurred in the mill that involved other land user rights.	
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - <b>Major compliance</b> -	Flemington POM located within Flemington Estate land area and demonstrated with legal ownership or leases with legal documents. Document review on the land titles demonstrated with SDPB name written as evidence of the legal ownership of the lands as sample follow.  Flemington Estate Verified that the management maintained the current total of 40 land titles. Based on the review. One copy of land titles is applicable to Flemington POM available with land title no.: 14XXXX, lot 5138.	Complied
<b>4.3.2.3</b>	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - <b>Major compliance</b> -	Flemington POM located within Flemington Estate land area and demonstrated with legal ownership or leases with legal documents. Legal perimeter boundary around the mill building complex to separate the management boundary of estate and the mill with monsoon drain and fencing. The housing and other recreational facilities are located within the same vicinity for ease of employees' management.	Complied
<b>4.3.2.4</b>	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - <b>Minor compliance</b> -	There was no land dispute at Flemington POM. SDPB has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable
<b>Criterion 4.3.3 – Customary rights</b>			

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<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	As at time of visit, there was no evidence to show that any land was encumbered by customary rights or land disputes.	Not Applicable
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. <b>- Minor compliance -</b>	As at time of visit, there was no evidence to show that any land was encumbered by customary rights or land disputes.	Not Applicable
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. <b>- Major compliance -</b>	As at time of visit, there was no evidence to show that any land was encumbered by customary rights or land disputes.	Not Applicable
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance -</b>	The management has conducted a Social Impact Assessment (SIA) for SOU 4 which include the Flemington POM and Supply Bases. The assessment has comprehensively integrated feedback obtained from stakeholder engagement meetings. Alongside presenting socio-economic baseline data, the resultant report highlighted a spectrum of issues, encompassing complaints, requests, and comments raised by various stakeholders associated with the mill. To address and resolve these identified issues, the mill has formulated an action plan specific to the Social Assessment for the year 2024, documented on 10/08/2024. This strategic plan takes into careful consideration the diverse perspectives and concerns from different stakeholders, including workers, surrounding	Complied

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		communities, government agencies, suppliers, contractors, as well as staff and management. This comprehensive approach ensures that the action plan is responsive to the specific needs and expectations of all relevant stakeholders, fostering a proactive and socially responsible mill operation. The issues in that has been raised during stakeholder meeting were also closely monitored in the SIA Action Plan, where verification during stakeholders consultation shows positive reaction from the stakeholders.									
<b>Criterion 4.4.2:</b> Complaints and grievances											
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	<p>SD Guthrie Berhad has implemented the Complaint Book (Internal), Complaint/Feedback Form (External), and Communication Book (Internal &amp; External) to document communications and complaints. The majority of complaints from internal stakeholders, primarily workers, were related to housing repairs (submitted through OPP Platform), which, according to records, were promptly addressed and resolved by estate management. Sighted the Grievance Response Standard Operating (Version 3.0, date approved on 07/05/2024). The timeline for the investigation is guided by the criteria as follow:</p> <table> <tr> <th>Criteria</th><th>Example of grievance</th><th colspan="2">Timeline</th></tr> <tr> <td>Inquiries or confirmation from operating units without interview of witness or review of documents</td><td>Request for repatriation, inquiries on housing condition and repairs, understanding of wage calculation,</td><td>Non-anonymous</td><td>2 weeks</td></tr> </table>	Criteria	Example of grievance	Timeline		Inquiries or confirmation from operating units without interview of witness or review of documents	Request for repatriation, inquiries on housing condition and repairs, understanding of wage calculation,	Non-anonymous	2 weeks	Complied
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			requests of transfer			
		Investigations involving interview of complaint and review of documents (not complex)	Does not involve interviews with randomly selected workers	Non-anonymo us	Not more than 4 weeks	
				Anonymo us	Not more than 3 months	
		Investigation involving interview of randomly selected workers/witness and review of documents (complex), where the complainant is not disclosed. Complainant gives the name of the alleged. In this case, many group of randomly selected workers will have to be	Harassment or disrespect by supervisor, unfair termination, Fraud, misappropriation, manipulation of documents	Non-anonymo us and anonymo us	Not more than 3 months	

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		interviewed to validate the allegations, hence, resulting in an extended period of investigations				
<b>4.4.2.2</b>	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. <b>- Major compliance -</b>	Consultation and communication were conducted through written reports and meetings. Any communication/request/grievances from external stakeholder were recorded in Suara Kami and Whistleblowing platform for stakeholders. For internal stakeholders, main grievances recorded were regarding housing repair. Sighted the Housing Repair form with latest report dated 06/07/2024. All complaints have been satisfactorily addressed by the mill.				Complied
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. <b>- Minor compliance -</b>	The mill has established communication book/form for internal and external complaint. The communication logbook/forms is available at mill office. In case the complainant would want to make an anonymity complaint it can be made through Suara Kami or Whistleblowing committee or toll-free number or fax or by mail. Oil Palm Pal (OPP) was use by the workers to lodge complaint regarding the house digitally, and the progress of each report are monitored. During site visit, sighted the QR code available for Suara Kami and OPP at the mill premises such as office area and living quarters.				Complied
<b>4.4.2.4</b>	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.	Interview with the internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure, and they were briefed by the management				Complied

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	- <b>Minor compliance</b> -	during stakeholder meeting that was conducted on 07/05/2024. The mill management has conducted the grievance training to the workers on 26/02/2024. Sighted the training record is available.	
<b>4.4.2.5</b>	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - <b>Major compliance</b> -	A check of records revealed that complaints and requests from the last 24 months are accessible.	Complied
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			
<b>4.4.3.1</b>	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - <b>Minor compliance</b> -	Since the last assessment, among the contributions from the mill were: 1. Gotong-royong at local housing area at Sungai Dulang on 08/06/2023 2. Yayasan Sime Darby Sinar Harapan – Bantuan Perayaan untuk Asnaf on 05/04/2024	Complied
<b>Criterion 4.4.4:</b> Employees safety and health			
<b>4.4.4.1</b>	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - <b>Major compliance</b> -	Flemington Palm Oil Mill has adopted and maintained the policy for Occupational Health and Safety as documented below: <ul style="list-style-type: none"> <li>Document: SD Guthrie Berhad Group Health, Safety &amp; Environment (HSE) Policy</li> <li>Reference No: IOM-CEOUM/HSE-014-05-2022</li> <li>Date: 05/05/2022</li> <li>Signed by: Group Managing Director.</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>The Policy stated the company commitment to the well-being of its employee, providing safe and healthy working environment, pre-emptively preventing our employees and external parties in the operations from injury and ill health as well as operating in an environmentally responsible manner at global operating sites.</p> <p>The policy also emphasized commitment to comply with statutory requirements, inculcating the culture of safety and health, improving the management of occupational safety, health related and environmental matters eliminating or minimizing any potential adverse effect on the environment arising from or business activities and to educate and encourage stakeholders in maintaining and enhancing the quality of the health, safety and environment.</p> <p>Verified the Communication of the Occupational Health and Safety Policy as below:</p> <ul style="list-style-type: none"> <li>• Document: Training record</li> <li>• Training: COBC, Human Right Charter, Whistle Blowing and Policies</li> <li>• Date: 19/01/2024</li> <li>• Attendees: 20 pax</li> </ul> <p>An occupational safety and health plan has been reviewed and verified as follows:</p> <ul style="list-style-type: none"> <li>• Document: Safety &amp; Health Management Plan 2024</li> </ul> <p>The plan covers the followings:</p>	

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		<ul style="list-style-type: none"> <li>- OSH Risk Management</li> <li>- OSH Structure</li> <li>- Incident Reporting</li> <li>- Emergency Preparedness &amp; response</li> <li>- Chemical safety Management</li> <li>- Contractor Safety Management</li> <li>- Vehicle &amp; Machinery safety Management</li> <li>- Communication</li> <li>- Inspection</li> <li>- Health and Hygiene Monitoring Program</li> <li>- Awareness and competency Training</li> <li>- Reporting</li> </ul> <ul style="list-style-type: none"> <li>• Quarterly reviewed</li> <li>• Latest Review: 14/06/2024 (reviewed during OSH Meeting)</li> <li>• Next review: September 2024</li> <li>• Remarks: Maintained</li> </ul> <p>Based on the site verification, documents reviewed and interview with the sampled workers an occupational safety and health policy and plan has been documented, effectively communicated and implemented.</p>	
<b>4.4.4.2</b>	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented.	The occupational safety and health plan cover the following:	Complied



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<p>b) The risk of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:</p> <ul style="list-style-type: none"> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded.</p>	<p>a) Policy for Occupational Health and Safety has been documented as verified below:</p> <ul style="list-style-type: none"> <li>- Document: SD Guthrie Berhad Group Health, Safety &amp; Environment Policy</li> <li>- Reference No: IOM-CEOUM/HSE-014-05-2022</li> <li>- Date: 05/05/2022</li> <li>- Signed by: Group Managing Director.</li> </ul> <p>b) The risk of all operation has been assessed and documented in as follows:</p> <ul style="list-style-type: none"> <li>▪ <b>HIRARC</b> <ul style="list-style-type: none"> <li>• Reference: UM/HSE/SP/01</li> <li>• Effective date: 09/03/2021</li> <li>• Latest reviewed:02/05/2024</li> <li>• Among verified reviewed stations: <ul style="list-style-type: none"> <li>- Kernel plant – 10/07/2024</li> <li>- Press station – 02/08/2024</li> <li>- Boiler station – 30/09/2023</li> <li>- Workshop – 12/10/2023</li> <li>- Sterilization station – 14/12/2023</li> </ul> </li> </ul> </li> <li>▪ <b>CHRA</b> <ul style="list-style-type: none"> <li>▪ Conducted by: Gxxxxxx Sdn Bhd</li> </ul> </li> </ul>	

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<p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<ul style="list-style-type: none"> <li>▪ Assessment date: 02/07/2020</li> <li>▪ Assessor: Hj Sxxxxxx Cxxx</li> <li>▪ DOSH Reg. No: HQ/09/ASS/110/124</li> <li>▪ CHRA, Report No: HQ/09/ASS/110/124 – 2020/0026</li> <li>▪ Medical Surveillance as per OSHA-USECHH 2000 requirements               <ul style="list-style-type: none"> <li>• Conducted by: Sxxxx Dxxxxxxxxx</li> <li>• OHD: Dr. Rxxxxxxxx R Nxxxx (HQ/08/DOC/00/131)</li> <li>• Dated 12/07/2024</li> <li>• No of workers 12 workers</li> <li>• The result stated that all 12 workers passed the medical program and were fit to work.</li> </ul> </li> <li>▪ Noise Risk Assessment Report (NRA) was conducted in compliance with Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 and is available for verification.               <ul style="list-style-type: none"> <li>- Conducted by: Sxxxx Txxx Cxxxxxxxxxxx Sdn Bhd</li> <li>- Date: 24 &amp; 25/5/2024</li> <li>- Assessor: Mxxxxxx Hxxxx bin Hxxxx</li> <li>- DOSH Reg Number: HQ/18/PEB/00/00021</li> </ul> </li> <li>▪ Audiometric Test Report 2023 – Occupational Safety and Health (Noise Exposure) Regulation 2019               <ul style="list-style-type: none"> <li>• Conducted by: Pxxxxxx Exxxxxxxxxxx (M) Sdn Bhd</li> </ul> </li> </ul>	

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		<div><ul style="list-style-type: none"><li>Date Testing: 21/08/2023</li><li>Tested by: Mxxxxxx Nxxxx bin Sxxxxxx</li><li>DOSH Reg No: HQ/17/DOC/00/00042</li><li>Results:<ul style="list-style-type: none"><li>- Tested: 32</li><li>- Normal Hearing: 24</li><li>- Abnormal: 8 (STS – 6) – (Retest within 3 months)</li><li>- (Conducted 08/11/2023 – Continue Annual Audiometry, Training + PHP)</li></ul></li></ul></div> <div>Verified for year 2024, PO 4300683516 dated 09/0/2024 awarded to Pxxxxxx Exxxxxxxxxxxxx (M) Sdn Bhd to conduct audiometric test by 31/08/2024 for 28 persons.</div> <div>▪ Engineering Control Examination Report – Local Exhaust Ventilation (LEV) Monitoring</div> <table><tr><td>Conducted by</td><td>: Pxxxxxx Exxxxxxxxxxxxx (M) Sdn Bhd</td></tr><tr><td>Hygiene Technician</td><td>: Mxxx Rxxxxx bin Hj Gxxxxxx</td></tr><tr><td>DOSH Registration</td><td>: HQ/16/JHII/00/23</td></tr><tr><td>Date monitoring</td><td>: 05/9/2023</td></tr><tr><td>Date completion</td><td>: 09/11/2023</td></tr></table> <div>Regulation 25 – Safety, Health &amp; Welfare Regulation 1970</div>	Conducted by	: Pxxxxxx Exxxxxxxxxxxxx (M) Sdn Bhd	Hygiene Technician	: Mxxx Rxxxxx bin Hj Gxxxxxx	DOSH Registration	: HQ/16/JHII/00/23	Date monitoring	: 05/9/2023	Date completion	: 09/11/2023	
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Date monitoring	: 05/9/2023												
Date completion	: 09/11/2023												

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		<p>Conclusion:</p> <p>Based on the examination and testing results it shows that the Laboratory Fume Cupboard performance has complied to ACGIH (American Conference of Governmental Industrial Hygiene) specification.</p> <p>The LEV system should be observed and inspected monthly by the internal maintenance staff appointed the company and every twelve months by an Industrial Hygiene Technician registered with DOSH</p> <p>Periodical maintenance and inspection of the LEV System is important in ensuring that the overall system performance is satisfactorily. The next testing should be carried out in September 2024.</p> <p>c) Annual training programmed has been established with document title Sime Darby Plantation Berhad SOU 04 – Flemington FY 2023 dated 02/02/2023 and prepared by Assistant Manager.</p> <p>Training record on safety verified as below:</p> <ul style="list-style-type: none"> <li>• ESH &amp; Other Policies – Apr 2024</li> <li>• HIRARC – Apr 2024</li> <li>• Notification of accident and dangerous occurrence – Apr 2024</li> <li>• OSH Committee Function &amp; Responsibility – March 2024</li> <li>• Accident Investigations technique Safety Plan, Training Program – Dec 2024.</li> </ul>	

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		<ul style="list-style-type: none"> <li>Basic Occupational First Aid – Feb 2024.</li> </ul> <p>Safe working sign are adequate at every station, etc. PPE use at workstation verified at the workshop and at laboratory. SDS also update and displayed in the chemical store.</p> <p>d) Management has provided appropriate PPE to workers to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). PPE Issuance record was available for verification. Inspected with sample workers interviewed found all PPE was given accordingly to their task given. PPE Matrix has been established as per HIRARC, SDS, CHRA and NRA.</p> <p>Sampled evidence:</p> <ul style="list-style-type: none"> <li>Recipient – Vxxxxxxxxx a/l Mxxxxxxxx               <ul style="list-style-type: none"> <li>- Ear Plug – 04/04/2024</li> <li>- L/Glove – 14/7/2024</li> <li>- Safety Shoe – 16/12/2023</li> </ul> </li> <li>Recipient – Zxxxxxx               <ul style="list-style-type: none"> <li>- Ear Plug – 07/07/2024</li> <li>- L/Glove – 24/7/2024</li> <li>- Safety Shoe – 06/06/2024</li> </ul> </li> </ul>	

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		<p>e) Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000 has been established with document title Sime Darby Plantation Berhad Upstream Malaysia (Chemical Safety Management) reference number UM/HSE/OCP/04 dated 09/03/2021 and prepared by Head Health Safety Environment, Upstream Malaysia</p> <ul style="list-style-type: none"> <li>• Objective – As guideline to define the requirement for the procurement, transportation, receiving, handling, storage, disposal and training on the handling or use of chemicals.</li> </ul> <p>f) Management has appointed responsible person for workers safety and health.</p> <ul style="list-style-type: none"> <li>• Appointed person – Mr. Abd Ghafar bin Sulaiman</li> <li>• Appointed – OSH Committee Chairman</li> <li>• Date – 01/01/2023</li> <li>• Appointed by – Nik Maziah Nik Mustapha, CEO Northern Region</li> </ul> <p>The management has appointed Mr. Pahmie bin Ibrahim (PK 23/OSHC/02/01814) appointed as OSH Coordinator as per letter dated 01/01/2024 by Chairman of OSH Committee.</p>	

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		<p>g) Management has conducted regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. OSH Meeting has been conducted on quarterly basis.</p> <p>For Year 2024 OSH Meeting conducted as follows:</p> <ul style="list-style-type: none"> <li>- Meeting 01/2024 – 20/03/2024</li> <li>- Meeting 02/2024 – 14/06/2024</li> </ul> <p>Referring to the OSH minutes of meeting, records were kept, and all the concern of the employees and any remedial actions taken was recorded.</p> <p>h) Management has established procedures on Accident and emergency. Verified the followings:</p> <ul style="list-style-type: none"> <li>• Document: Sime Darby Plantation Berhad Upstream Malaysia (Incidents, Accidents and Non-Compliance Managements Procedures)</li> <li>• Reference No: UM/HSE/SP/03 dated 01/06/2022.</li> </ul> <p>Flowchart for emergency has been placed at strategic location e.g Office notice board, Line site, store etc. Safety was given upon entrance of sample site visited. Interview with sample workers found they have good understanding on accident and emergency procedures.</p> <p>i) Verified the management has established the Emergency Response Team Year 2024 as per below:</p>	

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		<ul style="list-style-type: none"> <li>• Emergency Commander – Mr. Abdul Ghafar bin Sulaiman</li> <li>• Operation Controller – Mr. Pahmie Ibrahim</li> <li>• Fire Fighting &amp; Spillage Team – 5 representatives</li> <li>• Search &amp; Rescue Team – 5 representatives</li> <li>• First Aider Team – 5 representatives</li> <li>• Accident and Investigation Team – 5 representatives</li> </ul> <p>A fire drill training has been conducted on 06/06/2024 and attended by 60 participants.</p> <p>First aid box was inspected during site visit and found contains with approved contents. Verified that first aid box was available at each worksite. Verified the followings:</p> <ul style="list-style-type: none"> <li>• First Aid Refresher Training – 25/04/2024 attended by 11 persons</li> <li>• Verified First Aid Kit – Layout plan at mill</li> <li>• BOFA Training - 30 – 31/10/2023 <ul style="list-style-type: none"> <li>○ Kxxxxxx Jxxxxxx – Chargeman</li> <li>○ Mxxx Hxxxx bin Axxxx Rxxxxx – Wireman</li> <li>○ Certificate valid for 2 years</li> </ul> </li> </ul> <p>j) Accident record was verified during the audit. Accident record and investigation was recorded and discussed during quarterly OSH meeting. Refer JKKP 6,7 and 8 report.</p> <p>Submission of JKKP 8 2023 dated 11/01/2024 Reference number: JKKP 8/1612945/2023</p>	



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		<ul style="list-style-type: none"> <li>A total of 10 accidents reported with LTI 247 days.</li> <li>As for year 2024, 1 accident reported dated 29/7/2024, LTI 9 days</li> </ul>	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established the Human Right Charter in 2020.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has implemented a systematic approach to address social issues within the Sustainable Plantation Management System, as outlined in the documented procedure found in Appendix 5, Version 1, Issue No.1, dated 01/11/2008. This procedure provides a detailed framework for managing social issues raised by stakeholders, emphasizing effective, timely, and appropriate resolution.</p> <p>Additionally, the company has established a Standard Operation Manual (SOM) specifically for External Communication, documented in Appendix 5.5.3.2, Version 1. This manual sets forth a structured system for communicating with external interested parties regarding the mill's performance. The outlined timeframe for external communication ensures that feedback is provided within two weeks from the date of receipt for communications requiring direct feedback and within one week of the completion of investigations for communications requiring further investigation.</p> <p>Furthermore, the company has instituted the Suara Kami helpline Procedure, documented on 15/04/2020, and conducted Grievance Channel Training on 26/02/2024. These initiatives reflect the company's commitment to effective communication, addressing</p>	Complied

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		social issues, and ensuring a responsive and accountable approach to stakeholder concerns. The management has conducted the policy briefing on 05/03/2024 and 18/03/2024.	
<b>4.4.5.2</b>	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. <b>- Major compliance -</b>	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity union membership, political affiliation or age. Briefing on wages were also conducted to the workers. Sighted the briefing record of "Briefing to PMI/TKI/Nepal workers – Payslip component/wages calculation/offer letter/ILO Indicator/OPP/Social Dialogue/Grievance Channel/OSH/medical access/Freedom of movement/passport management/passport locker" on 19/02/2024.	Complied
<b>4.4.5.3</b>	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. <b>- Major compliance -</b>	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic	OFI

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		<p>origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity union membership, political affiliation or age. The policy has been briefed to all the employees and stakeholders. Sighted the briefing record of "Briefing to PMI/TKI/Nepal workers – Payslip component/wages calculation/offer letter/ILO Indicator/OPP/Social Dialogue/Grievance Channel/OSH/medical access/Freedom of movement/passport management/passport locker" on 19/02/2024. Sample of the worker is such as follow:</p> <ol style="list-style-type: none"> <li>1. 0000123xxx</li> <li>2. 0000183xxx</li> <li>3. 0000xxx080</li> <li>4. 0000xxx081</li> <li>5. 0000096xxx</li> <li>6. 0000102xxx</li> <li>7. 0000047xxx</li> </ol> <p>The mill management may improve on the communication towards the foreign workers regarding the latest requirement of SOCSO contribution - OFI</p>	
<b>4.4.5.4</b>	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>The management has use the contractor for the rental of machineries at the estate and mill. Verified that the rental of machineries contracts the M.x Rxxx Enterprise. The contractor has submitted the employment contract, salary slip, EPF and SOCSO statement. Verify the payment received by the employees of contractor is compliance in Minimum Wages Order 2022.</p>	Complied
<b>4.4.5.5</b>	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and</p>	<p>The mill management has registered all their workers into Employee Master Details Listing in SEMUA system where personal</p>	Complied

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	subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - <b>Major compliance</b> -	details such as full name, gender, date of birth, date join company, race, designation, and wages were recorded.	
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - <b>Major compliance</b> -	The mill management has employed local and foreign workers from Indonesia and Nepal. They are all under direct employment to the mill. All of them have signed on the employment contract prior to work and extension contract where the original contract has expired. Terms and conditions were according to Collective Agreement and Employment Act 1955. Interview session verify that the workers were given their own contract for own references. Sample of the workers is such as follow: 1. 0000123xxx 2. 0000183xxx 3. 0000xxx080 4. 0000xxx081 5. 0000096xxx 6. 0000102xxx 7. 0000047xxx	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - <b>Major compliance</b> -	All daily attendance were recorded by punch card system on daily basis and overtime was recorded in the individual card. Besides, the summary of Mill Daily Attendance Report for every month was developed and maintained as well.	Complied
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective	All daily attendance were recorded by punch card system on daily basis and overtime was recorded in the individual card. SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has	Complied

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	agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. <b>- Major compliance -</b>	obtain permit for overtime work not more than 130 hours per month from Peninsular Malaysia Labour Office as per letter dated 27/3/2017. Refer letter ref. no. BHG.PU/9/134 JLD 9 (11). Monitoring of the working hours and overtime were also conducted via Mill Daily Attendance Report	
<b>4.4.5.9</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. <b>- Major compliance -</b>	Wages and overtime were paid according to the "Punch card system". Total hours of overtime and daily attendance has recorded in the individual card. All of the sampled employees above have been paid in accordance to the Minimum Wage Order 2022 i.e. RM1500/month or RM57.69/day. Hours of overtime has recorded in the payslip and the payment for overtime were paid according to the legal requirements. Sampled of eight workers agreement and pay slips for May 2024, November 2023 and August 2023 are verified.	Complied
<b>4.4.5.10</b>	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. <b>- Minor compliance -</b>	The management has contributed 10kg of rice once every 2 months for all their workers. Apart from that, all the workers are provided with free medical facilities. In additional, all the workers are entitled with the phone allowance of RM5 for every month. Free housing facilities were provided to all the workers and their families.	Complied
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. <b>- Major compliance -</b>	The mill's management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers. Linesite inspection was carried out on weekly basis by Mill Supervisor using Housing Complex/ Nest/ Community Hall Inspections.	Complied

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<b>4.4.5.12</b>	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. <b>- Major compliance -</b>	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They seek to create a working environment with zero tolerance for sexual harassment and abuse and in which violence is never used to resolve issues or conflict.  Latest Policy Briefing was conducted at Flemington POM on 19/01/2024. Gender meeting was also conducted in the mill on 20/04/2024 where sexual harassment and violence has also been discusses if there is any report regarding the issue.	Complied
<b>4.4.5.13</b>	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. <b>- Major compliance -</b>	Union meeting conducted on 08/05/2024. The minute of meeting is sighted, together with the attendance list. Latest Social Dialogue was conducted 21/06/2024 – verification of the issues were tracked in Social Dialogue Tracking System.	Complied
<b>4.4.5.14</b>	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. <b>- Major compliance -</b>	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has incorporated its policy on protecting the rights of children in the "Group Sustainability & Quality Policy Statement" mention in Indicator 4.1.1.2. Based on verification of workers register, there was no evidence that anyone below 18 years of age was recruited for employment. The mill management has also	Complied

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		conducted training regarding the employment of children and young person. Sighted the training record of "ILO Briefing to Workers by Manager" on 05/03/2024	
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p><b>- Major compliance -</b></p>	<p>A documented training programme has been developed and available in the Training and Safety Briefing Plan for Year 2024. The trainings were sighted to have included Gender Specific Training and involves staffs and workers. Verified the followings:</p> <ul style="list-style-type: none"> <li>- <b>Document 1:</b> Year 2024 Training Programme</li> <li>The programme covers: <ol style="list-style-type: none"> <li>1. ESH &amp; Other Policies</li> <li>2. SDP Policies, SOBC, HRDC</li> <li>3. HIRARC</li> <li>4. Basic Occupational First Aid</li> <li>5. Ergonomic Training</li> <li>6. Hearing Conservation Training</li> <li>7. Emergency Response Team Training</li> <li>8. EIE/EAI</li> <li>9. 5 major high risk (mill)</li> <li>10. LO-TO System</li> <li>11. Safe work Procedure for all Stations (SOP)</li> <li>12. RSPO &amp; MSPO Training (Including Supply Chain)</li> </ol> </li> <li>- <b>Document 2:</b> Year 2024 Training Record</li> </ul>	Complied

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		<p>The programme covers:</p> <ol style="list-style-type: none"> <li>1. Emergency Response Plan – Spillage dated 06/06/2024</li> <li>2. Schedule waste management dated 26/07/2024</li> <li>3. EIA/EIE dated 06/06/2024</li> <li>4. HCV Management dated 02/04/2024</li> <li>5. RSPO/MSPO Training (including supply chain) dated 10/07/2024</li> <li>6. SDP Policies, SOBC, HRDC dated 16/01/2024</li> </ol> <p>Based on the documents reviewed it was concluded that the training program has been effectively established and is accessible to all staffs and stakeholders. The program also includes gender specific needs.</p>	
<b>4.4.6.2</b>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p><b>- Major compliance -</b></p>	<p>The training need analysis was conducted based on the job designation and training required by the job type.</p> <p>Documented information: SD Guthrie Berhad SOU 4 Flemington Oil Mill FY 2024 (KPOM/OSH-08) Training need analysis, Training evaluation.</p> <p>Based on the documents reviewed it was concluded that the training program has been effectively established and is accessible to all staffs and workers.</p>	Complied
<b>4.4.6.3</b>	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p><b>- Minor compliance -</b></p>	<p>The management has established a procedure related to resource management – provision for resource emphasizing on competence, awareness and training, "Standard Operating Manual Section 6, Sub Section 6.2 dated 01/11/2008".</p>	Complied



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		<p>A training programme has been developed and available. Refer Annual Training Plan FY 2024. Training has been implemented as per training programme. Sample workers checked has undergo training and have good understanding on their job function and responsibility.</p> <p>Trainings were effectively conducted for all work process. The effectiveness of the trainings was then assessed, and evidence of understanding were available and verified.</p>	
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>Flemington Palm Oil Mill has adopted and maintained the policy for SDP Group Health, Safety &amp; Environment (HSE) Policy</p> <ul style="list-style-type: none"> <li>• Reference No: IOM-CEOUM/HSE-014-05-2022</li> <li>• Date: 05/05/2022</li> <li>• Signed by: Group Managing Director</li> </ul> <p>The policy has been communicated to the workers through induction training, morning briefing and displayed at various notice boards within the estates. Sighted the evidence:</p> <ul style="list-style-type: none"> <li>• Document: Training Record</li> <li>• Training: SD Guthrie Berhad Policies, COBC, HRD briefing</li> <li>• Date: 19/01/2024</li> <li>• Attendees: 44 persons</li> </ul>	Complied

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		<p>The management also has established the environmental management plan to meet the objective and sustaining the environment and biodiversity. Sighted the evidence:</p> <ul style="list-style-type: none"> <li>• Document: Environmental Management Plan</li> <li>• Year: FY20234</li> </ul> <p>Among action plan for the environment verified were:</p> <ul style="list-style-type: none"> <li>- Environmental Management</li> <li>- Pollution Prevention</li> <li>- HCV/Biodiversity</li> </ul>	
<b>4.5.1.2</b>	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations</p> <p><b>- Major compliance -</b></p>	<p>The management has established environmental management (EMP) plan based on environment aspect and impacts (EAI) analysis of all operation conducted. Sighted the evidence:</p> <ul style="list-style-type: none"> <li>• Document: Environmental Management Plan (EMP)</li> <li>• Year: FY2024</li> </ul> <p>Among action plan for the environment verified were:</p> <ul style="list-style-type: none"> <li>▪ <b>Environmental Management</b></li> </ul> <p>Objectives – to maintain the effectiveness of EAI/EIE</p> <p>The environmental aspect impact (EAI) analysis has been established for all operations in the mill. Sighted the evidence:</p> <ul style="list-style-type: none"> <li>- Document: Environment Aspect Impact Assessment (EAI)</li> <li>- Date review: 01/06/2018</li> <li>- Activities: laboratory, pump house, mixing tank, reception station, sterilizer station, pressing station, oil room station,</li> </ul>	Complied

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		<p>effluent treatment plant, clarification station, diesel storage, EFB yard.</p> <p>Verified the following:</p> <ul style="list-style-type: none"> <li>- Area station: Boiler</li> <li>- Activity – Washing and Cleaning at Boiler</li> <li>- Environmental Aspect – Solid Waste Disposal</li> <li>- Environmental Impact – Air Pollution, Land Contamination, unpleasant working environment <ul style="list-style-type: none"> <li>▪ Mitigation plan <ul style="list-style-type: none"> <li>- Boiler ash used as road resurfacing i.e Flemington Estate</li> </ul> </li> </ul> </li> </ul>	
<b>4.5.1.3</b>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>The management has developed environmental management plan (EMP) to mitigate the negative impacts and to promote the positive ones were effectively implemented. The monitoring on the action plan was reviewed on Year 2024. Sighted the evidence:</p> <ul style="list-style-type: none"> <li>• Document: Environmental Management Plan (EMP)</li> <li>• Year: FY2024</li> </ul> <p>Among action plan for the environment verified were:</p> <ul style="list-style-type: none"> <li>- To ensure all scheduled waste is stored and disposed as per legal requirement</li> <li>- To provide regular inspection for vehicle for operation purposes</li> <li>- To maintain oil trap as to prevent oil spillage and to provide proper spill kit</li> </ul> <p>Referring to environmental management plan (EMP) it was highlighted the negative impact and to promote to positive and monitored. Sighted the evidence:</p>	Complied

Criterion / Indicator		Assessment Findings			Compliance												
		<table><tr><th>Area</th><th>Negative Impact</th><th>Positive Impact</th></tr><tr><td>Housing complex</td><td>Open burning can cause air pollution</td><td>Prohibited open burning and carry out rubbish collection every week</td></tr><tr><td>POME</td><td>POME discharge can cause water pollution</td><td>POME being treated before discharge to water course</td></tr><tr><td>Scheduled waste</td><td>Chemical spillage cause pollution to environment.</td><td>Provide a spillage kit at scheduled waste store. To ensure proper of waste disposal as per legal</td></tr></table>	Area	Negative Impact	Positive Impact	Housing complex	Open burning can cause air pollution	Prohibited open burning and carry out rubbish collection every week	POME	POME discharge can cause water pollution	POME being treated before discharge to water course	Scheduled waste	Chemical spillage cause pollution to environment.	Provide a spillage kit at scheduled waste store. To ensure proper of waste disposal as per legal			
Area	Negative Impact	Positive Impact															
Housing complex	Open burning can cause air pollution	Prohibited open burning and carry out rubbish collection every week															
POME	POME discharge can cause water pollution	POME being treated before discharge to water course															
Scheduled waste	Chemical spillage cause pollution to environment.	Provide a spillage kit at scheduled waste store. To ensure proper of waste disposal as per legal															
		During site visit, it was verification at schedule waste store and effluent treatment plant: <ul style="list-style-type: none"><li>• No chemical spillage at schedule waste store</li><li>• There is spillage kit at schedule waste store</li><li>• There is labelling &amp; safety signage at schedule waste store</li><li>• POME discharge were monitoring at effluent treatment plant</li><li>• POME discharge meet the specification of parameter</li><li>• Good maintenance &amp; upkeep of pond at effluent treatment plant</li></ul>															
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	A programmed to promote the positive impact has been included in the environmental management plan (EMP). The person in charge were included in the plan for monitoring the progress. Sighted the evidence:			Complied												

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		<ul style="list-style-type: none"> <li>- Document: Environmental Management Plan (EMP)</li> </ul> Refer Indicator: 4.5.1.3	
<b>4.5.1.5</b>	<p>An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.</p> <p><b>- Major compliance -</b></p>	<p>The management has continuously provided training to the workers to create awareness regarding on the environment. This is to ensure the employee were understanding the company policy and working towards achieving the environment objectives. Sighted the evidence:</p> <ul style="list-style-type: none"> <li>• Document: Training Programme - Environment</li> <li>• Date: FY 2024 <ul style="list-style-type: none"> <li>- Training 1: Environment Policy Training</li> <li>- Training 2: Schedule Waste Training</li> <li>- Training 3: HVC &amp; Biodiversity Training</li> <li>- Training 4: Chemical Handling &amp; Spillage</li> <li>- Training 5: Environmental Impact Assessment</li> </ul> </li> </ul>	Complied
<b>4.5.1.6</b>	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p><b>- Major compliance -</b></p>	<p>The management has been discussed the concern of environmental issues. The discussions on environmental issues were discussed with employees at the following forums. Sighted the evidence:</p> <ul style="list-style-type: none"> <li>• Stakeholder Meeting – 07/05/2024</li> <li>• EPMC Meeting <ul style="list-style-type: none"> <li>- 01/2024 dated 29/03/2024</li> <li>- 02/2024 dated 28/06/2024</li> </ul> </li> </ul> <p>The meeting mainly discussion focused on the environmental issue such as:</p> <ul style="list-style-type: none"> <li>• Laporan Schedule waste management</li> <li>• Laporan Waste</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance									
		<ul style="list-style-type: none"><li>• Laporan Pemantauan Udara Bersih</li><li>• Laporan Effluen</li><li>• Laporan Water Discharge</li><li>• Reporting and Communication</li></ul>										
Criterion 4.5.2: Efficiency of energy use and use of renewable energy												
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period  - Major compliance -	<p>Flemington POM maintains records of energy usage, which is reported monthly to head office through SAP system. The use of the steam turbine for electricity generation has been optimized in order to reduce the dependence on diesel fossil fuel.</p> <p>The monitoring of non-renewable energy usage was conducted monthly.</p> <table><tr><td></td><td>2023</td><td>2024 (todate)</td></tr><tr><td>kWh turbine</td><td>2,547,300</td><td>1,717,800</td></tr><tr><td>RE/CPO</td><td>70.91 kWh/CPO</td><td>71.15 kWh/CPO</td></tr></table> <p>The Flemington POM maintained the monthly records non-renewable energy include actual usage, estimate usage and baseline value. The bar chart graph is also established to show the non-renewable usage trend.</p>		2023	2024 (todate)	kWh turbine	2,547,300	1,717,800	RE/CPO	70.91 kWh/CPO	71.15 kWh/CPO	Complied
	2023	2024 (todate)										
kWh turbine	2,547,300	1,717,800										
RE/CPO	70.91 kWh/CPO	71.15 kWh/CPO										
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.  - Major compliance -	<p>The management has an estimation of the total energy required. This estimation was compared to the actual usage on a monthly basis and reported to the head office for monitoring purposes. Fossil fuel usage for 2023 and to date 2024 summarized as per below table:</p> <table><tr><td></td><td>2023</td><td>2024 (todate)</td></tr><tr><td>Diesel usage (liter)</td><td>2,749</td><td>2,300</td></tr></table>		2023	2024 (todate)	Diesel usage (liter)	2,749	2,300	Complied			
	2023	2024 (todate)										
Diesel usage (liter)	2,749	2,300										

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Criterion / Indicator		Assessment Findings			Compliance			
		<table border="1"><tr><td>Diesel/CPO</td><td>0.077 litre/CPO</td><td>0.095 litre/CPO</td></tr></table> <p>The estimation of the total energy required is available in the annual budget prepared by the management of Flemington POM.</p>			Diesel/CPO	0.077 litre/CPO	0.095 litre/CPO	
Diesel/CPO	0.077 litre/CPO	0.095 litre/CPO						
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	<p>The mill makes use of the mill's FFB by-product for power generation; fibre, shredded fibre, and palm shell are used in the boiler.</p> <p>Noticed that there is 14 units renewable energy (solar panel) for street lighting at security post, office compound and influent treatment fond area.</p>			Complied			
Criterion 4.5.3: Waste management and disposal								
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>All waste and pollution are identified and documented in the Waste Management Action Plan (WMP). The compilation was made at by the Sustainability Department applicable to the Palm Oil Mill. Details of waste generated from the operations among others as shown below. Sighted the evidence:</p> <ul style="list-style-type: none"><li>• Document: Waste Management Plan (WMP)</li><li>• Date: FY 2024</li></ul> <p>The objectives are as follows:</p> <p>Proper disposal of waste in accordance to SOP and legal requirements. Waste identified and categorized as:</p> <ul style="list-style-type: none"><li>- Domestic waste – household general waste, sewage</li><li>- Industrial waste – Scrap metal yard, Used tyres</li><li>- Scheduled waste – Used lubricants, Empty container, contaminated/used rags</li></ul>			Complied			

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Criterion / Indicator		Assessment Findings	Compliance
		<p>- Production waste – EFB, shell, fibre, POME, boiler ash</p> <p>Document: Inventory of Schedule Waste Date: 31/07/2024</p> <p>Refer to inventory of schedule waste. It was mentioning the storage of schedule waste in the estate:</p> <ul style="list-style-type: none"> <li>• SW 109 – Fluorescent Lamp 0.0040mt generated 28/6/2024</li> <li>• SW 110 – Lampu LED Terpakai 0.0390mt generated 27/02/2024</li> <li>• SW 305 – Minyak terpakai 1.0500mt generated 27/02/2024</li> <li>• SW 409 – Bekas kimia terpakai 0.4800 mt generated 27/02/2024</li> <li>• SW 410 – Oil Filter &amp; Rags 0.94 mt generated 27/02/2024</li> </ul>	
<b>4.5.3.2</b>	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p><b>- Major compliance -</b></p>	<p>The management has developed waste management plan (WMP) to ensure the waste generated in estate are good well manage. The waste product and waste pollution has identified. Sighted the evidence:</p> <ul style="list-style-type: none"> <li>• Document: Waste Identification</li> <li>• Date: FY 2024</li> <li>• Document: Inventory of Schedule Waste</li> <li>• Date: 31/07/2024</li> </ul> <p>The recycling of waste and potential waste has been implemented in the estate where is converting them into value added of by product. Sighted the evidence:</p> <ul style="list-style-type: none"> <li>• Recycle waste. <ul style="list-style-type: none"> <li>- Paper, Plastic, Bottle: 3R product for recycle purpose</li> </ul> </li> </ul>	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Potential waste <ul style="list-style-type: none"> <li>EFB: use as organic fertilizer</li> <li>Decanter cake: sale back as animal feed</li> <li>Effluent Solid: use as organic fertilizer</li> <li>Shell: reused as boiler fuel combustion</li> <li>Fibre: reused as boiler fuel combustion</li> </ul> </li> </ul>	
<b>4.5.3.3</b>	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p><b>- Major compliance -</b></p>	<p>Procedure of Schedule waste management has been established. Refer Waste Management Procedure for Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01. Other reference made was Guidelines for Packaging, Labelling and Storage of Scheduled Wastes In Malaysia.</p> <p>During site visit to schedule waste store. It was sighted the implementation and practices as following below:</p> <ul style="list-style-type: none"> <li>Signboard of schedule waste store</li> <li>PPE has provided from company</li> <li>Safety signage has available and displayed</li> <li>Spillage kit has available</li> <li>Labelling of each schedule waste has displayed</li> </ul> <p>Refer to inventory of schedule waste. It was mentioning the storage of schedule waste in the estate:</p> <ul style="list-style-type: none"> <li>SW 109 – Fluorescent Lamp 0.0040mt generated 28/6/2024</li> <li>SW 110 – Lampu LED Terpakai 0.0390mt generated 27/02/2024</li> </ul>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> <li>• SW 305 – Minyak terpakai 1.0500mt generated 27/02/2024</li> <li>• SW 409 – Bekas kimia terpakai 0.4800 mt generated 27/02/2024</li> <li>• SW 410 – Oil Filter &amp; Rags 0.94 mt generated 27/02/2024</li> </ul> <p>Verified latest disposal of Scheduled Waste:</p> <ul style="list-style-type: none"> <li>• Document: Consignment Note for Scheduled Waste</li> <li>• Consignment Note No: 2023112715J5IFVE</li> <li>• Date: 27/11/2023</li> <li>• Contractor: Kxxxxxxx Axxx Sdn Bhd</li> <li>• Waste Code: SW 410 – Rags, Plastic, paper or filter – 0.552 mt</li> </ul> <ul style="list-style-type: none"> <li>• Document: Consignment Note for Scheduled Waste</li> <li>• Consignment Note No: 2023112715PKR7T0</li> <li>• Date: 27/11/2023</li> <li>• Contractor: Kxxxxxxx Axxx Sdn Bhd</li> <li>• Waste Code: SW 109 – waste Containing mercury or its compound – 0.0050 mt</li> </ul> <ul style="list-style-type: none"> <li>• Document: Consignment Note for Scheduled Waste</li> <li>• Consignment Note No: 2023112715D85GTI</li> <li>• Date: 27/11/2023</li> <li>• Contractor: Kxxxxxxx Axxx Sdn Bhd</li> </ul>	

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Waste Code: SW 322 – waste of non-halogenated organic solvents compound – 0.0800 mt</li> </ul>	
<b>4.5.3.4</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. <b>- Minor compliance -</b>	<p>The management has organized the domestic waste collection at housing area 3 times a week and disposed to proper designated Majlis Perbandaran Teluk Intan approved landfill.</p> <p>Collection: 3 times for every week and stored in waste BIN</p> <p>Transported by Fxxx transportation</p>	Complied
<b>Criterion 4.5.4:</b> Reduction of pollution and emission			
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	<p>The environmental aspect and impact have been identified the polluting activities in estate. This included gas emissions, scheduled waste and solid waste. Sighted the evidence:</p> <p>Schedule Waste Management</p> <ul style="list-style-type: none"> <li>Document: Inventory of Schedule Waste</li> </ul> <p>Verified inventory as per Indicator 4.5.3.3</p> <p>Among assessment conducted:</p> <ul style="list-style-type: none"> <li>Boiler Emission Monitoring</li> <li>Document: Stack Monitoring Report Boiler No. 3</li> <li>Date: 26 July 2024</li> <li>Conducted by: Pxxxxxx Exxxxxxxxxxxx (M) Sdn Bhd</li> </ul>	Complied
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	The management has established management plan to identify the significant pollution and action plan to reduce the pollution and emission. Sighted the evidence:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Document: Pollution Prevention Plan (PPP) Date review: 22/05/2023 Action plan 1: Mangrove wood to support of bund Action plan 2: Monitor &amp; check the level of pond Action plan 3: Use metal tray for prevent spillage Action plan 4: Schedule waste stored in SW Store Document: Waste Management Plan (WMP) Date review: 01/07/2023 Action plan 1: Collect &amp; record the schedule waste item Action plan 2: Dispose SW by registered contractor Action plan 3: Collection of domestic waste 3 times a week Action plan 4: Appointed the PIC for schedule waste</p>	
<b>4.5.4.3</b>	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p><b>- Major compliance -</b></p>	<p>The management has sent the POME to the external laboratory for analysis of sample effluent to ensure that the effluent meet the specification. Sighted the evidence: Document: Monthly Effluent Analysis – Final Discharge Month: July 2024 Reference: EP415/2024 Results: pH – 9.2 (Resampling carried out) 8.93 BOD – 33 SS – 150 TN – 40 AN - &lt;1</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																																				
		O&G - < 1																																					
Criterion 4.5.4: Reduction of pollution and emission																																							
4.5.5.1	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <p>a) Assessment of water usage and sources.</p> <p>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</p> <p>c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>- Major compliance -</p>	<p>The management has established the Water Management Plan state the follow;</p> <p>1. Protection watercourse</p> <p>To monitor the water quality by sending water sampling for analysis by R&amp;D.</p> <p>2. Contingency plan during water shortage</p> <p>a) To record water usage level to be capped at the volume permitted in license.</p> <p>b) To renew license for abstracting of water from water bodies.</p> <p>c) Treated water to process</p> <p>a) The mill consume the raw water from reservoir (rain water in catchment) to be process and treated for the mill operation for purpose. The clean water supply for domestic consumption via Lembaga Air Perak (LAP)</p> <p>b) The mill water analysis results taken on monthly basis based on "Jadual Pematuhan" and results as sampled below;</p> <table><tr><td></td><td></td><td colspan="2">09/07/2024</td><td colspan="2">11/06/2024</td></tr><tr><td>Parameters</td><td>Std</td><td>Hulu</td><td>Hilir</td><td>Hulu</td><td>Hilir</td></tr><tr><td>pH</td><td>6-9</td><td>7.29</td><td>7.28</td><td>7.24</td><td>7.26</td></tr><tr><td>BOD mg/l</td><td>3</td><td>2</td><td>2</td><td>1</td><td>2</td></tr><tr><td>COD mg/l</td><td>25</td><td>28</td><td>32</td><td>16</td><td>32</td></tr><tr><td>S Solids mg/l</td><td>50</td><td>116</td><td>84</td><td>36</td><td>48</td></tr></table>			09/07/2024		11/06/2024		Parameters	Std	Hulu	Hilir	Hulu	Hilir	pH	6-9	7.29	7.28	7.24	7.26	BOD mg/l	3	2	2	1	2	COD mg/l	25	28	32	16	32	S Solids mg/l	50	116	84	36	48	Complied
		09/07/2024		11/06/2024																																			
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Criterion / Indicator		Assessment Findings						Compliance																																								
		<table><tr><td>Amm Nitrogen mg/l</td><td>0.3</td><td>&lt;1</td><td>&lt;1</td><td>&lt;1</td><td>&lt;1</td></tr><tr><td>D Oxygen mg/l</td><td>5-7</td><td>2.88</td><td>2.60</td><td>3.56</td><td>3.71</td></tr><tr><td>Phosphorus mg/l</td><td>0.2</td><td>0.048</td><td>0.025</td><td>0.039</td><td>0.042</td></tr></table> <p>Deviation was investigated via document dated 10/08/2024 and 28/06/2024 and respectively explained. i.e. DO decreased exponentially as salt levels increases.</p>						Amm Nitrogen mg/l	0.3	<1	<1	<1	<1	D Oxygen mg/l	5-7	2.88	2.60	3.56	3.71	Phosphorus mg/l	0.2	0.048	0.025	0.039	0.042																							
Amm Nitrogen mg/l	0.3	<1	<1	<1	<1																																											
D Oxygen mg/l	5-7	2.88	2.60	3.56	3.71																																											
Phosphorus mg/l	0.2	0.048	0.025	0.039	0.042																																											
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. <b>- Major compliance -</b>	<p>Based on Jadual Pematuhan FPOM disposed effluent on water discharge final point exit to Sg Dulang via Flemington Estate field. Sighted quarterly report has been submitted to DOE (license no 006277 (01/07/2024 - 30/06/2025) by quarterly basis. Submission to DOE on July for period April – June 2024. Among others the indicators were:</p> <table><tr><td>Jan – Mac</td><td>STD</td><td>17/04/24</td><td>20/05/24</td><td>19/06/24</td></tr><tr><td>pH</td><td>5-9</td><td>8.87</td><td>8.91</td><td>9.25</td></tr><tr><td>BOD mg/l</td><td>100</td><td>75</td><td>36</td><td>36</td></tr><tr><td>A Nitrogen</td><td>150</td><td>18</td><td>2</td><td>2</td></tr><tr><td>Total N</td><td>200</td><td>89</td><td>46</td><td>46</td></tr><tr><td>Oil &amp; Grease</td><td>50</td><td>4</td><td>5</td><td>7</td></tr><tr><td>Total Solids</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>S Solids</td><td>400</td><td>400</td><td>330</td><td>330</td></tr></table> <p>All parameters tested complied with regulatory standards except for marginal pH level.</p>						Jan – Mac	STD	17/04/24	20/05/24	19/06/24	pH	5-9	8.87	8.91	9.25	BOD mg/l	100	75	36	36	A Nitrogen	150	18	2	2	Total N	200	89	46	46	Oil & Grease	50	4	5	7	Total Solids	-	-	-	-	S Solids	400	400	330	330	Complied
Jan – Mac	STD	17/04/24	20/05/24	19/06/24																																												
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Total Solids	-	-	-	-																																												
S Solids	400	400	330	330																																												
4.6 Principle 6: Best Practices																																																

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Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.6.1: Mill Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. <b>- Major compliance -</b>	<p>SOU 4 continued to use the documents established by the Sime Darby Plantation Berhad among others as follows:</p> <ul style="list-style-type: none"> <li>• Plantations - Mill Quality Management System (PQMS/MQMS) Manual</li> <li>• PQMS - MQMS Std Operating Manual (SOM) &amp; Procedures (SOP)</li> <li>• Sustainable Plantation Management System (SPMS) Manual</li> <li>• RSPO Supply Chain Manual</li> <li>• Health, safety and Environment Management System Manual</li> <li>• Occupational Safety and Health Manual</li> <li>• Pictorial Safety Standards</li> <li>• Laboratory Process Control Manual</li> <li>• Security Guidelines.</li> </ul> <p>In addition, technical guidelines as listed in the Agricultural Reference Manual were also used. In general, the documents included operation activities in the mills from:</p> <ul style="list-style-type: none"> <li>• Plantation upkeep to mill FFB receipt, grading, processing.</li> <li>• Quality analysis and dispatch of CPO &amp; PK.</li> </ul> <p>Contents of the Manual were disseminated to the workers through.</p> <ul style="list-style-type: none"> <li>• Morning muster</li> <li>• Mill weekly briefings</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>• Training as ad hoc and programmed basis.</li> </ul> <p>The Manuals are also kept in the administration office to facilitate reference by any interested parties. Site inspection and interview with workers confirmed that the SOP had been implemented and the employees understood the requirements of the SOP. In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p> <p>The mill operation also guided by Safe Working Practices documented as follows:</p> <ul style="list-style-type: none"> <li>• Document: SWP – Pengendalian Operasi Stesen Boiler</li> <li>• Reviewed date: 11/10/ 2021 <ul style="list-style-type: none"> <li>- Keselamatan Pekerjaan</li> <li>- Boiler sebelum process</li> <li>- Memulakan Proses</li> <li>- Semasa Proses</li> <li>- Selepas Proses</li> </ul> </li> </ul>	
<b>4.6.1.2</b>	All palm oil mills shall implement best practices. <b>- Major compliance -</b>	A mechanism on checking the consistency of mill implementation of their procedures was in place. Among the mechanism such as Performance Monitoring Visit, SORA/SCRA visit, and Internal Audit.	Complied
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.	The management have established 5 years business plan as a guide for daily mill operations. Sighted the 5-year business plan is available for verification. The business plan contains total cost	Complied



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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	production, total FFB processing, cost / tonne FFB, OER & KER. Sighted the evidence: Document: 5 Year Planning - Budget Year Plan: FY 2023 – FY 2028	
<b>Criterion 4.6.3:</b> Transparent and fair price dealing			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	The management has established pricing mechanism and conducted as per contract agreement with contractors. Review on the contract agreement, sighted pricing of the job task is available. Sampled contract/Letter of Award to contractors as follows: Letter of Award (LOA) for the rental of machineries for 1+1 year at estates and mill dated 09/05/2024 to M.x Rxxx Enterprise. The contract valid for 1 year from 01/06/2024 until 31/05/2025 and signed by both parties on 21/05/2024. The service fee has been elaborated in the agreement under Appendix 1 (Scope of Services). Evident the payment voucher Doc No: 4300678620 dated 31/07/2024 to M.x Rxxx Enterprise	Complied
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	The company has established pricing mechanism and conducted as per contract agreement with contractors. Review on the contract agreement, sighted pricing of the job task is available. Payment terms for contract work were stated in the contract agreement as briefed in 4.6.3.1. Onsite stakeholder consultation with contractors informed their payments were made as per payment terms stated in the contracts. No delayed of payments recorded.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	<p>Mill management has provided a list of contractors engaged by the mill. Briefing to all contractors regarding MSPO requirements including company policy by conducted stakeholder meeting with contractor on 07/05/2024.</p> <p>During the audit, a selection of contracts was reviewed, and it was found that these contracts contained a clause emphasizing the importance of complying with legal requirements. Specifically, clause compliance of laws and guidelines of the contract agreement stipulated that contractors shall comply with the provision of the relevant act, regulations and laws. Interview during stakeholder consultation also verify that the contractor was given briefing and training regarding the MSPO requirement. Sighted the training record of "Contractor compliance Training on Safety and Social Aspects" that was conducted on 2/03/2024.</p> <p>Sampled contract agreement were reviewed during the audit. For rental of machineries for 1+1 year at estates and mill. Sighted is the following contractor:</p> <p>1. M.X RXXX Enterprise: Contract valid from 01/06/2024 to 31/05/2025</p>	Complied
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	<p>Contract agreements between the mill and its contractors were made available. Generally, the elements of sustainability such as obligations to legal compliance, workers' welfare, safety and environmental issues are stated in the contract agreements.</p> <p>The contracts examined during this audit demonstrate that all agreements are equitable, legal, and transparent, with clearly defined terms and conditions. Key elements covered in these</p>	Complied

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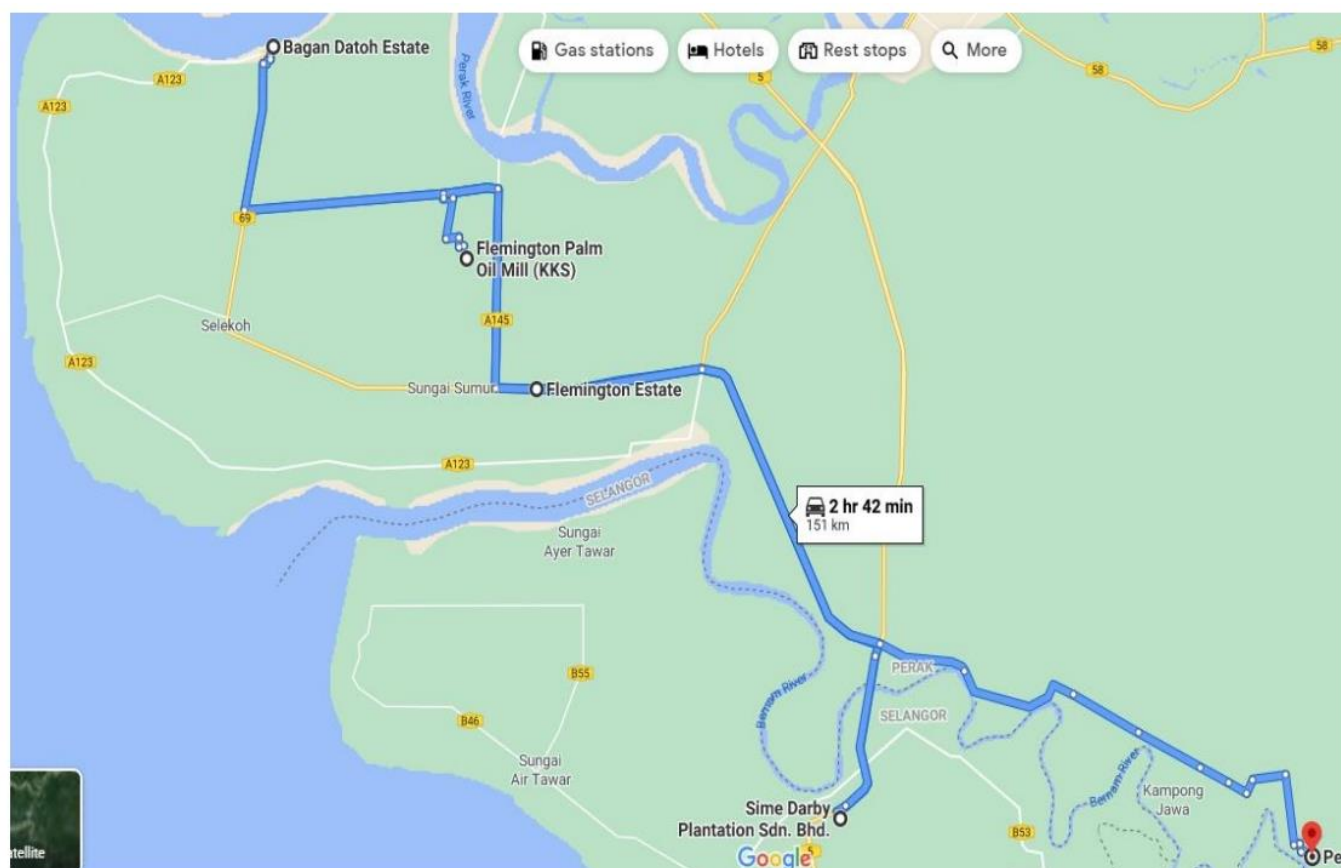
Criterion / Indicator		Assessment Findings	Compliance
		contracts include the purpose of the agreement, rights and obligations of both parties, contract amount and payment terms, insurance, contractor responsibility and mutual termination clause. Notable contracts reviewed include: 1. M.X RXXX Enterprise: Contract valid from 01/06/2024 to 31/05/2025	
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. <b>- Minor compliance -</b>	No restriction of the accessibility of auditors. The mill management and contractor agreed and accepted MSPO approved auditors to verify assessments through inspection of records, sighting of the workers performing work in the field and interviews with contractor's employees.  The reviewed sample of contract agreements, as mentioned in indicator 4.6.4.2, found that there is a specific clause where stated the contractor to provide and allow the certification bodies (CBs) MSPO to access the contractor operation when requested by CB.	Complied

## Appendix B: Smallholder Member Details

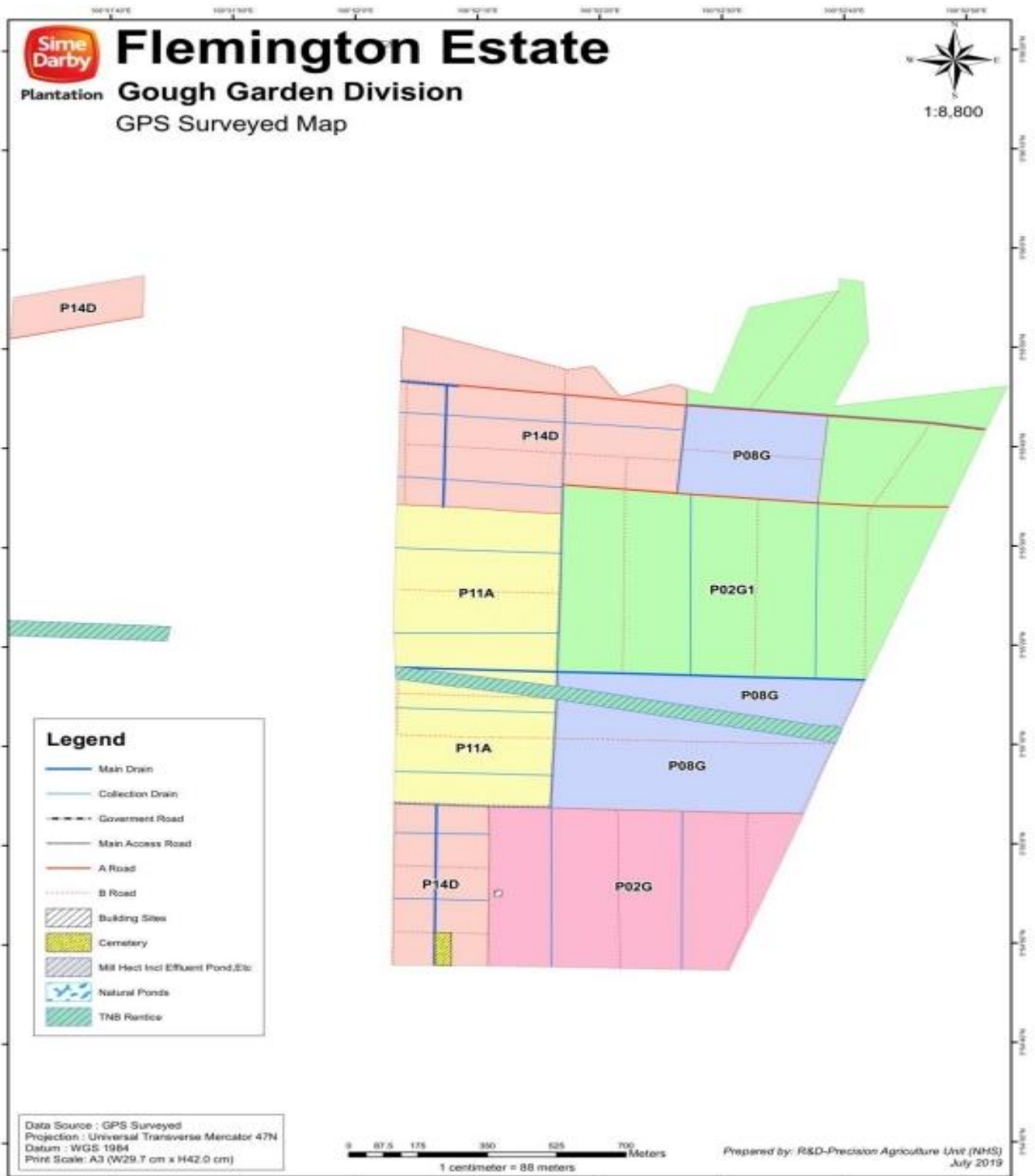
[illegible]

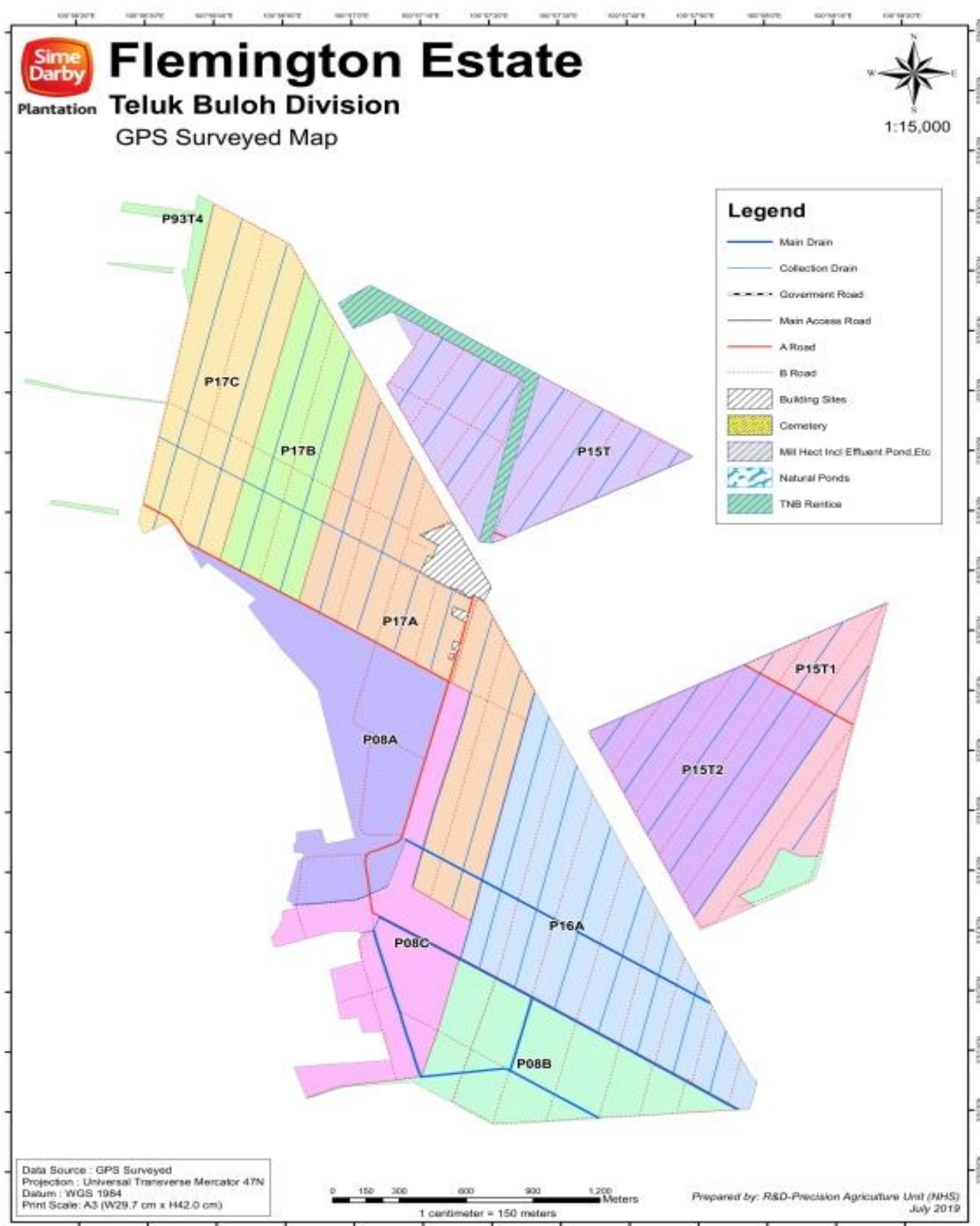
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**Appendix C: Location and Field Map**



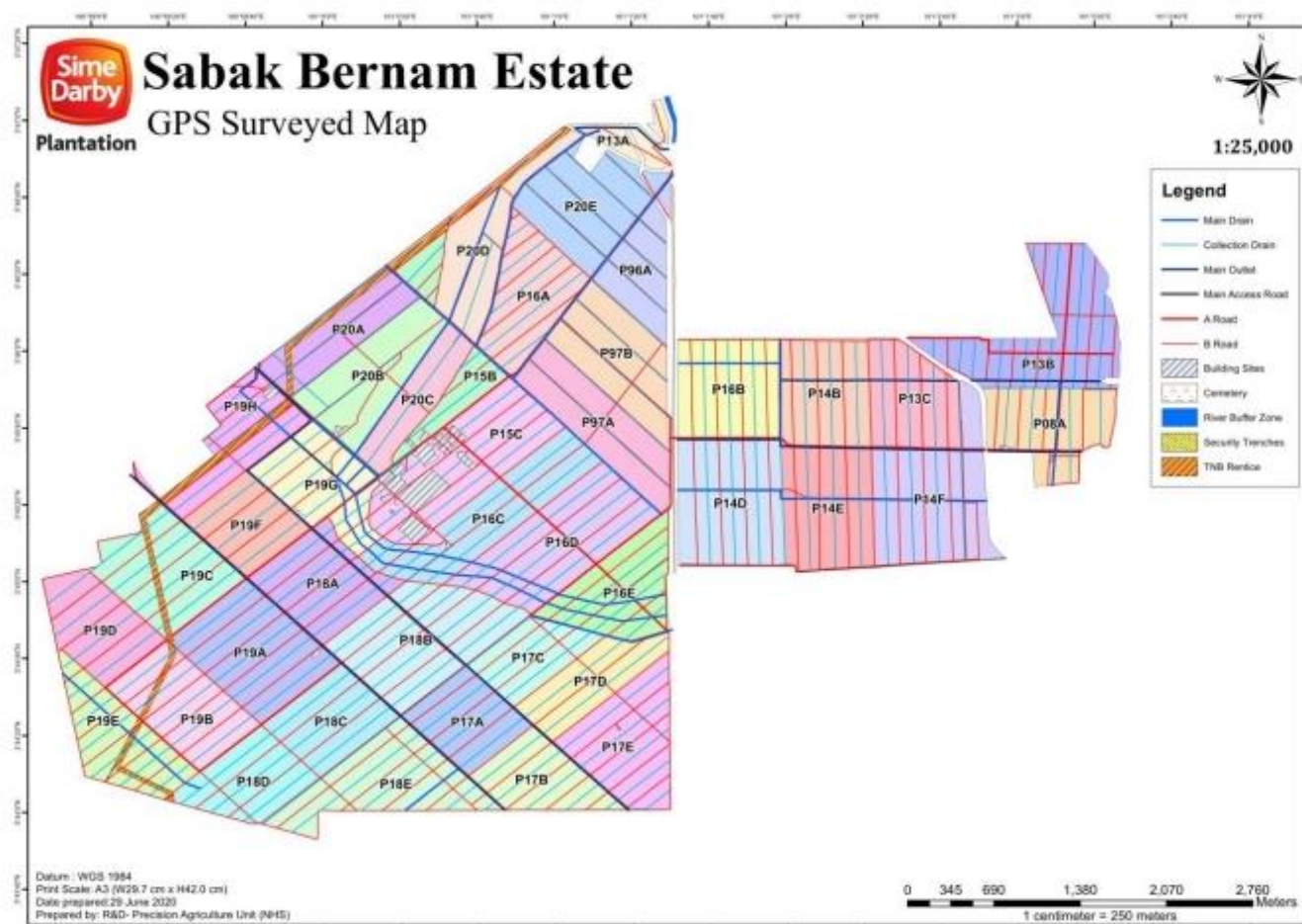
**Flemington Estate**





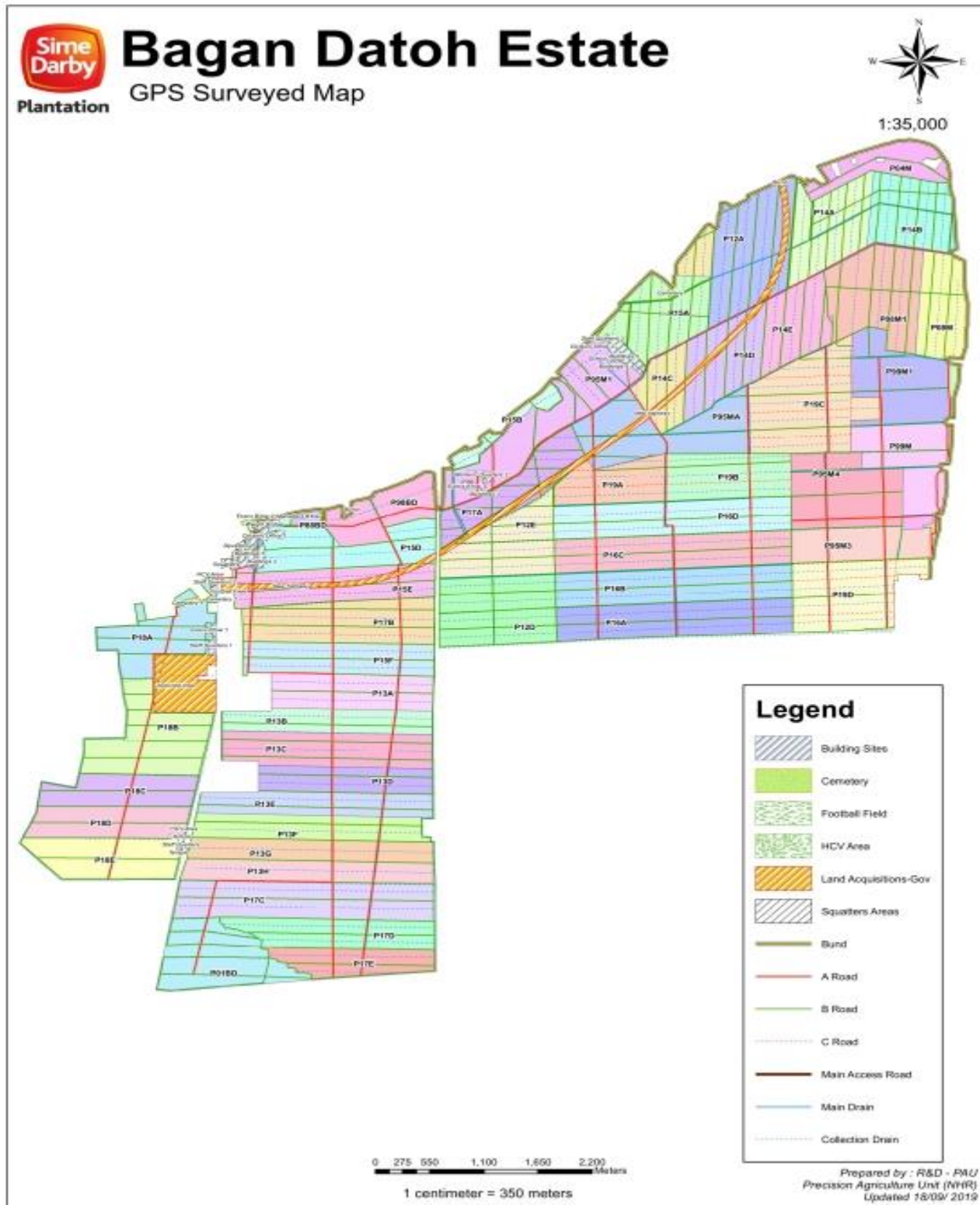


**Sabak Bernam Estate**





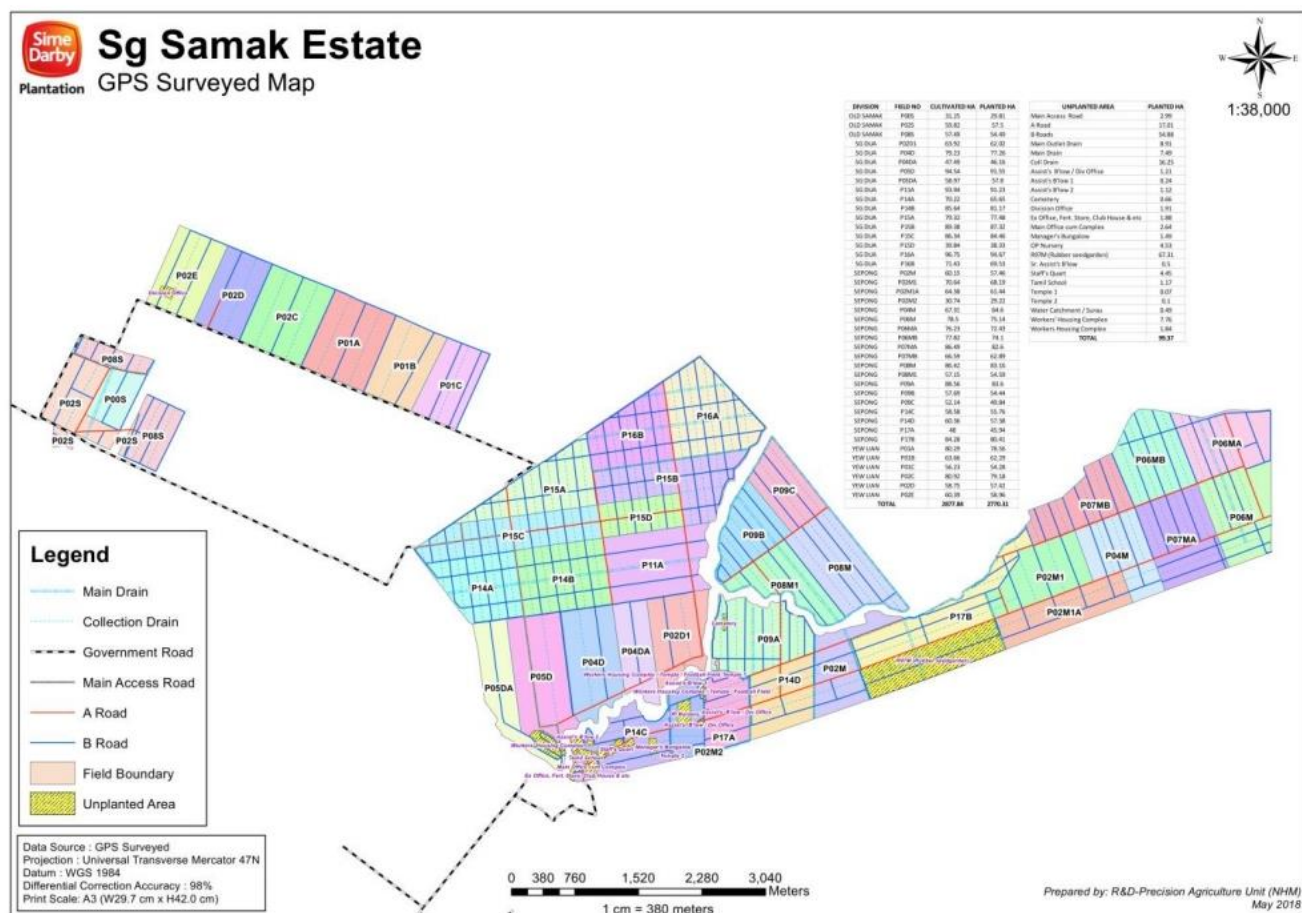
**Bagan Datoh Estate**



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## Sg Samak Estate



**Appendix D: List of Abbreviations**

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm 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
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
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
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure