

**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 18) Diamond Jubilee Palm Oil Mill and Plantations: Diamond Jubilee Estate, Bukit Asahan Estate and Welch Estate
Date of Final Report: 10/10/2024

**Report prepared by:**  
**Farrah Sahanim Binti Paduka** (Lead Auditor)

**Report Number: 3984756**

**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>
	Diamond Jubilee POM	500288804000	30/09/2024
	Diamond Jubilee Estate	522967002000	31/08/2024
	Bukit Asahan Estate	527615002000	28/02/2025
	Welch Estate	522499002000	31/07/2024
<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, GSD)		
<b>Website</b>	www.sdguthrie.com	<b>E-mail</b>	shylaja.vasudevan@sdguthrie.com
<b>Telephone</b>	+603-89478888 (HQ)	<b>Facsimile</b>	03-78484356 (HQ)

1.2 Certification Information			
<b>Certificate Number</b>	Mill: MSPO 682043 Estate: MSPO 688335	<b>Certificate Start Date</b>	10/01/2023
<b>Date of First Certification</b>	10/01/2018	<b>Certificate Expiry Date</b>	09/01/2028
<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 Annual Surveillance Assessment (ASA1_2) and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organization's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organization's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the 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 Assessment Visit Date (RAV)</b>		04/07/2022 - 08/07/2022	
<b>Continuous Assessment Visit Date (CAV) 1_1</b>		03/07/2023 - 06/07/2023	
<b>Continuous Assessment Visit Date (CAV) 1_2</b>		02/07/2024 – 05/07/2024	

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<b>Continuous Assessment Visit Date (CAV) 1_3</b>	-
<b>Continuous Assessment Visit Date (CAV) 1_4</b>	-

### 1.3 Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 591224	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019.	BSI Services Malaysia Sdn Bhd	04/10/2026
MSPO 714120	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018	BSI Services Malaysia Sdn Bhd	11/07/2029

### 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
Diamond Jubilee POM	KM 8, Jasin-Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia	2° 19' 28.02" N	102° 28' 56.21" E
Diamond Jubilee Estate	Ladang Diamond Jubilee, KM 8, Jasin-Simpang Bekoh Road, District of Jasin, 77100 Jasin, Melaka, Malaysia	2° 19' 29.50" N	102° 28' 59.12" E
Bukit Asahan Estate	Ladang Bukit Asahan, Jalan Asahan, 77100 Jasin, Melaka, Malaysia	2° 24' 25.99" N	102° 33' 47.99" E
Welch Estate	Jalan Segamat-Jementah, 85200 Segamat, Johor, Malaysia	2° 27' 24.66" N	102° 39' 18.72" E

### 1.5 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Diamond Jubilee	2,545.52*	5.58	279.54**	2,830.64	89.93
Bukit Asahan	2,965.53	1.36	105.29	3,072.18	96.53
Welch	576.20	0.95	870.67	1,447.82	39.80
<b>Total (ha)</b>	<b>6,087.25</b>	<b>7.89</b>	<b>1,255.50</b>	<b>7,350.64</b>	

Note:

1) \* 77.72 ha of total planted area at Diamond Jubilee Estate has been acquired for state Gov development project.

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- 2) \*\*Recent land surveying on Jan 2024 by Precision Agricultural Unit (PAU) (Internal R&D), the actual area has been concluded 2,830.64 ha (Reference to Estate Hectares Statement, HRVRM029 dated 1/7/2024). Hence total infrastructure area has been revised from 279.02ha in year 2023 to 279.54ha in year 2024 (as stated in above table). There is no new planting.

Attached here with is the area statement for year 2024. The figure for DJE for year 2023 was referred to GPS hectarage statement which is deemed to be inaccurate.

## 1.6 Plantings &amp; Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 30	26 - 30		
Diamond Jubilee	56.7	1,093.28	1,386.48	9.06	-	2,488.82	56.7
Bukit Asahan	534.61	614.01	1,816.91	0.00	-	2,430.92	5,34.61
Welch	0	0	543.16	33.04	-	576.20	0
<b>Total (ha)</b>	<b>591.31</b>	<b>1,707.29</b>	<b>3,746.55</b>	<b>42.10</b>	<b>-</b>	<b>5,495.94</b>	<b>591.31</b>

## 1.7 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Jan 24 - Dec 24)	Actual (Jul 23 - June 24)	Forecast (Jan 25 - Dec 25)
Diamond Jubilee	44,984.41	49,419.36	42,623.45
Bukit Asahan	40,600.00	31,526.62	4,4450.43
Welch	12,090.00	8,642.25	8,092.13
Pertang (Diversion)	-	145.19	-
Kok Foh (Diversion)	-	263.82	-
<b>Total (mt)</b>	<b>97,674.41</b>	<b>89,997.24</b>	<b>95,166.01</b>

## 1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Jan 24 - Dec 24)	Actual (Jul 23 - June 24)	Forecast (Jan 25 - Dec 25)
Nil	N/A	N/A	N/A
<b>Total (mt)</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

## 1.9 Certified Tonnage

Mill Capacity: 25 MT/hr	Estimated (Jan 24 - Dec 24)	Actual (Jul 23 - June 24)	Forecast (Jan 25 - Dec 25)
	FFB	FFB	FFB
	97,674.41	89,997.24	95,166.01
<b>SCC Model:</b>	<b>CPO (OER: 21.5 %)</b>	<b>CPO (OER: 19.67 %)</b>	<b>CPO (OER: 21.66 %)</b>

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<b>SG</b>	21,000	17,705.81	20,612.95
	<b>PK (KER: 5.16 %)</b>	<b>PK (KER: 4.91 %)</b>	<b>PK (KER: 5.40 %)</b>
	5,042.09	4,420.90	5,138.96

#### 1.10 Actual Sold Volume (CPO)

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
17,705.81	0.00	N/A	13,347.00	2,620.82	15,967.82

#### 1.11 Actual Sold Volume (PK)

PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
4,420.90	0.00	N/A	3,114.89	976.25	4,091.14

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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 02-05/07/2024. The audit programme is included as Section 2.4. The approach to the audit was to treat the Diamond Jubilee POM, Diamond Jubilee Estate, Bukit Asahan Estate and Welch Estate as a MSPO Certification Unit. 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 were based on the formula  $(r\sqrt{n})$ ; where  $r$  is the risk factor (may defer 1, 1.5 and 2 depending on risk), where  $n$  is total number of group members. 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)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Diamond Jubilee POM	✓	✓	✓	✓	✓
Diamond Jubilee Estate	-	✓	✓	-	✓
Bukit Asahan Estate	✓	-	-	✓	-
Welch Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: July 2, 2024 - July 5, 2024**

**Total No. of Mandays: 11**

### 2.1 BSI Assessment Team

Team Member Name	Role (Team Leader or Team member)	Qualifications (Short description of the team members)
Farrah Sahanim binti Paduka (FSP)	Team Leader	<p><b>Education:</b> Graduated in Bachelor of Science Forestry With Honours (Nature Park and Recreation) at University Malaysia Sabah.</p> <p><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.</p> <p><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 &amp; IRCA Certified ISO 9001:2015 and ISO 45001:2018, RSPO P&amp;C and SA 8000.</p> <p><b>Aspect covered in this audit:</b> <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental</p> <p><b>Language proficiency:</b> Able to speak and understand Bahasa Malaysia and English.</p>
Ahmad Ruffi bin Abu Talib Khan (ARA)	Team Member	<p><b>Education:</b> Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015.</p> <p><b>Work Experience:</b></p>



		<p>He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years' experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). Currently working as auditor for palm oil sustainability certifications.</p> <p><b>Training attended:</b></p> <p>He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course.</p> <p><b>Aspect covered in this audit:</b></p> <p><input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental</p> <p><b>Language proficiency:</b></p> <p>Able to speak and understand Bahasa Malaysia and English.</p>
Mohd Razaleigh bin Mohamad (MRM)	Team Member	<p><b>Education:</b></p> <p>He graduated Bachelor (Scs.) Plantations Management and Agrotechnology from Universiti Teknologi Mara (UiTM) in 2012.</p> <p><b>Work Experience:</b></p> <p>He gained his working exposure in the plantations sector, serving as Senior Assistant Manager with Tradewinds Plantations Berhad from 2012 until 2017 and has been doing audit for RSPO P&amp;C, MSPO, since 2017 until now.</p> <p><b>Training attended:</b></p> <p>He has successfully completed ISO 9001:2015 (2020), ISO 14001:2015 (2017), ISO 45001:2018 (2021), Endorsed RSPO P&amp;C Lead Auditor Course (2018), Endorsed MSPO P&amp;C Lead Auditor Course (2017), Social Accountability SA8000 (2019), Endorsed RSPO Independent Smallholder (IHS), (2022), Training on the Application of Fundamental Principles and Rights at Work and Fair Recruitment by International Labour Organization (ILO), (2024), HCV and HCS Training (2024).</p> <p><b>Aspect covered in this audit:</b></p> <p><input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input type="checkbox"/> Environmental</p> <p><b>Language proficiency:</b></p> <p>Able to speak and understand Bahasa Malaysia and English.</p>

## 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
	N/A	

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## 2.4 Assessment Plan

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

Date	Time	Subjects	FSP	ARK	MRM
Monday, 01/07/2024	-	Audit team travelling to hotel	√	√	√
Tuesday, 02/07/2024 <b>Diamond Jubilee Estate</b>	07:30	Audit team travel to Bukit Asahan Estate	√	√	√
	08:30 - 09:00	Opening meeting combine with RSPO audit team at Bukit Asahan Estate <ul style="list-style-type: none"> <li>• Presentation by BSI Lead Auditor - introduction of team member and assessment agenda</li> <li>• Confirmation of assessment scope and finalizing audit plan</li> <li>• Verification on previous audit finding</li> </ul>	√	√	√
	09:00 - 13:00	<b>Audit team travel to Diamond Jubilee Estate</b> Processing area (reception station – dispatch station), workshop, schedule waste store, chemical store, lubricant store, water treatment plant, laboratory, effluent treatment plant, diesel skid tank, mill housing and landfill area.  Personal Interview: Operation workers, and staffs Scope Assessment: Social, safety and environment issues  <b>Stakeholder Consultations</b> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities, neighboring estates, smallholders, villages, workers representative, etc.	√	√	√
	13:00 - 14:00	Lunch break	√	√	√
	14:00 - 16:30	<b>Document Review</b> P1: Management Commitment & Responsibilities P2: Transparency P3: Compliance to Legal Requirements P4: Social Responsibility, Health, Safety and Employment Condition P5: Environment, Natural Resources, Biodiversity and Ecosystem Services P6: Best Practices	√	√	√

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Date	Time	Subjects	FSP	ARK	MRM
	16:30 - 17:00	Interim closing meeting	√	√	√
Wednesday, 03/07/2024  <b>Diamond Jubilee Estate (ARK)</b>  <b>Welch Estate (FSP, MRM)</b>	08:30 - 13:00	<b>Estate Visit</b> Field operation such as harvesting, manuring, spraying, boundary inspection, buffer zone area, HCV area, workshop, chemical store, fertilizer store, schedule waste store, chemical mixing area, clinic, workers housing area and landfill area.  Personal Interview: Operation workers, and staffs Scope Assessment: Social, safety and environment issues  <b>Stakeholder Consultations</b> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities, neighboring estates, smallholders, villages, workers representative, etc.	√	√	√
	13:00 - 14:00	Lunch break	√	√	√
	14:00 - 16:30	<b>Document Review (MSPO Part 3)</b> P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social, health, safety and employment condition P5: Environment, natural resources and biodiversity P6: Best practices P7: Development of New Planting (if any)	√	√	√
	16:30 - 17:00	Interim closing meeting	√	√	√

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Date	Time	Subjects	FSP	ARK	MRM
Thursday, 04/07/2024 <b>Diamond Jubilee POM (MSPO Part 4)</b>	08:30 - 13:00	<b>Palm Oil Mill Visit</b> Field operation such as harvesting, manuring, spraying, boundary inspection, buffer zone area, HCV area, workshop, chemical store, fertilizer store, schedule waste store, chemical mixing area, clinic, workers housing area and landfill area.  Personal Interview: Operation workers, and staffs Scope Assessment: Social, safety and environment issues  <b>Stakeholder Consultations</b> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities, neighboring estates, smallholders, villages, workers representative, etc.	√	√	√
	13:00 - 14:00	Lunch break	√	√	√
	14:30 - 16:30	<b>Document Review (MSPO Part 4)</b> P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social, health, safety and employment condition P5: Environment, natural resources and biodiversity P6: Best practices P7: Development of New Planting (if any)	√	√	√
	16:30 - 17:00	Interim closing meeting	√	√	√
Friday, 05/07/2024 <b>Welch Estate</b>	08:30 - 13:00	<b>Estate Visit</b> Field operation such as harvesting, manuring, spraying, boundary inspection, buffer zone area, HCV area, workshop, chemical store, fertilizer store, schedule waste store, chemical mixing area, clinic, workers housing area and landfill area.  Personal Interview: Operation workers, and staffs Scope Assessment: Social, safety and environment issues	√	√	-
	13:00 - 14:00	Lunch break	√	√	-

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Date	Time	Subjects	FSP	ARK	MRM
	14:00 - 16:00	<b>Document Review (MSPO Part 3)</b> P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social, health, safety and employment condition P5: Environment, natural resources and biodiversity P6: Best practices P7: Development of New Planting (if any)	√	√	-
	16:00 - 16:30	Assessment team discussion and preparation for closing meeting	√	√	-
	16:30 - 17:00	Closing meeting	√	√	√

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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 & three (3) Minor nonconformities and one (1) OFI raised. The SOU 18 Diamond Jubilee 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.

Non-Conformity Report			
<b>NCR Ref #:</b>	2517951-202407-N1	<b>Issue Date:</b>	05/08/2024
<b>Due Date:</b>	Next assessment visit	<b>Date of Closure:</b>	Open
<b>Area/Process:</b>	SD Guthrie-Diamond Jubilee Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.4.5.4 Minor
<b>Requirements:</b>	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.		
<b>Statement of Nonconformity:</b>	The process of 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 is not fully implemented.		
<b>Objective Evidence:</b>	<p>It is verified that the Contractor has submitted the Employment Contract, Salary Slip, EPF Statement, and SOCSO Statement to both estates visited.</p> <p>Sample taken at Diamond Jubilee Estate – Ponxxx Entxxxxxx (Contractor) salary slip, and EPF statement found that one worker with IC No; 6005XX-XX-XXXX, found that there is no EPF Employer contribution for the specific worker. This is not in line with Third Schedule of EPF Act 1991. Thus, the Minor NC is raised.</p>		
<b>Corrections:</b>	Communicate/brief the contractor for their level of understanding on EPF contribution from employee and their employer for all age categories.		
<b>Root cause analysis:</b>	The contractor did not fully understand the requirement on EPF contribution for workers above 60 years old.		

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<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>Briefing and training to the PIC and contractor by OU Management about the awareness of EPF contribution employee above 60 years old.</li> <li>Monthly monitoring on payslip from contractor to make sure contractor comply with the regulation of the EPF deduction as per requirement.</li> </ol>
<b>Assessment Conclusion:</b>	The correction, root cause analysis and the corrective action are accepted. Evidence of effectiveness of the implementation will be verified on the next assessment.

Non-Conformity Report			
<b>NCR Ref #:</b>	2517951-202407-N2	<b>Issue Date:</b>	05/07/2024
<b>Due Date:</b>	Next assessment visit	<b>Date of Closure:</b>	Open
<b>Area/Process:</b>	SD Guthrie-Diamond Jubilee POM	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 4: 4.4.4.1 Minor
<b>Requirements:</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>Statement of Nonconformity:</b>	PPE usage has not been effectively monitored.		
<b>Objective Evidence:</b>	<p>Noise risk assessment conducted on 04/02/2020 by Ms Nxx Ixxxxx Sxxxxx NRA registration number HQ/16/PEB/00/158 report reference number HQ/LPROYKPEB/20/00078 for all operations.</p> <p>As per assessment, sighted recommendation by assessor to continue with current practices which the management has supplied 3M-1270 Earplug NRR24 and to established agreement for using earplugs for all workers and executive before enter the production plant</p> <p>HIRARC for sterilizers updated on 24/01/2024 mentioned potential risk; noise place exposure between 86dB- 115dB and action plan to wear earplug with NRR up to 24dB.</p> <p>Verified PPE matrix which sterilizer station has been classified as Others; mentioned that earplug is one of the PPE required.</p> <p>During site visit, sighted that one of the POM personnel are not wearing earplug while inspecting the sterilizer area during the process.</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>To brief all workers on their responsibility on wearing PPE as required by OSHA and enforce that PPE to be worn when performing stated jobs.</li> <li>Management to report in E-Sime+ and give warning to the particular worker.</li> </ol>		
<b>Root cause analysis:</b>	Disciplinary action for noncompliance by workers on PPE usage is not fully enforced by Mill Management which has resulted in workers not taking it seriously.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>Management to enforce safety culture to all workers by reporting any unsafe act to respective supervisor or in E-Sime+.</li> <li>Moving forward, actions will be taken to workers who do not comply with the PPE requirement which includes verbal reminder/warning &amp; issuance of warning letter for repeated offenders.</li> <li>To constantly brief workers on their responsibility to wear PPE based on legal requirement.</li> </ol>		

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<b>Assessment Conclusion:</b>	The correction, root cause analysis and the corrective action are accepted. Evidence of effectiveness of the implementation will be verified on the next assessment.
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Non-Conformity Report			
<b>NCR Ref #:</b>	2517951-202407-N3	<b>Issue Date:</b>	05/08/2024
<b>Due Date:</b>	Next assessment Visit	<b>Date of Closure:</b>	Open
<b>Area/Process:</b>	SD Guthrie-Diamond Jubilee POM	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 4: 4.4.5.4 Minor
<b>Requirements:</b>	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.		
<b>Statement of Nonconformity:</b>	The process of 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 is not fully implemented.		
<b>Objective Evidence:</b>	<p>The management has engaged the contractor for the CPO shipment from the mill to the refinery. Verified that the CPO contract the Mekxx Angxxx Sdn Bhd. The contractor has submitted the employment contract, salary slip, EPF and SOCSO statement on monthly basis.</p> <p>Sample taken on the employment contract found that there is a discrepancy between the leave offered regarding the paternity leave. Verification in the employment contract from Mexxx Angxxx Sdn Bhd dated 03/02/2024 in Clause C – Cuti Keperian (iii) Dapat Anak – (Pekerja Lelaki Sahaja) which is stated two days compared to seven days stipulated in the Employment (Amendment) Act 2022, section 60F (1).</p>		
<b>Corrections:</b>	The contractor will issue an amendment of the contract to the worker reflecting the latest eligibility of paternity leave.		
<b>Root cause analysis:</b>	The contractor did not refer to the latest amendment in the Employment Act 2022 when he issued the employment letter.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Management to ensure monthly monitoring of contractors' document.</li> <li>2. Management to enforce on legal requirement need to be complied by contractors and their responsibility to adhere with it.</li> <li>3. During annual briefing or whenever necessary, Mill management will brief the latest amendment/ update of any relevant changes to the law and regulation to contractors.</li> </ol>		
<b>Assessment Conclusion:</b>	The correction, root cause analysis and the corrective action are accepted. Evidence of effectiveness of the implementation will be verified on the next assessment.		

Opportunity For Improvement			
<b>Ref:</b>	2517951-202407-O1	<b>Clause:</b>	MSPO Part 4: 4.5.3.3
<b>Area/Process:</b>	SD Guthrie Diamond Jubilee POM		
<b>Objective Evidence:</b>	The mill management may improve on the awareness regarding the schedule waste category for the contaminated used PPE as per documentation in the Environmental Management Plan.		



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Noteworthy Positive Comments	
1.	Good commitment from the management team on the preparation of the audit
2.	Document readiness is at satisfactory level during reviewing

### 3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	N/A	Issue Date:	N/A
Due Date:	N/A	Date of Closure:	N/A
Area/Process:	N/A	Clause & Category: (Major / Minor)	MSPO Part __:
Clause:	N/A		
Requirements:	N/A		
Statement of Nonconformity:	N/A		
Objective Evidence:	N/A		
Corrections:	N/A		
Root cause analysis:	N/A		
Corrective Actions:	N/A		
Assessment Conclusion:	N/A		
Verification Statement:	N/A		

Opportunity For Improvement			
Ref:	2365405-202306-I1	Clause:	MSPO 2530 Part 3: 4.4.5.12
Area/Process:	Diamond Jubilee Estate and Bukit Asahan Estate		
Objective Evidence:	Gender Committee for Diamond Jubilee Estate and Bukit Asahan Estate may improve the agenda in minutes of meeting as per suggested topics related to women in guideline document.		
Verification Statement:	Verify the agenda in minute meeting is as per the Gender Committee Guidelines, v2 dated January 2024 approved by Chief Sustainability Officer with revision in all sections of OTR to reflect current practices.		

Opportunity For Improvement			
Ref:	2365405-202306-I2	Clause:	MSPO 2530 Part 3: 4.4.5.12
Area/Process:	Diamond Jubilee POM		
Objective Evidence:	Gender Committee for Diamond Jubilee POM may improve the agenda in minutes of meeting as per suggested topics related to women in guideline document.		

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<b>Verification Statement:</b>	Verify the agenda in minute meeting is as per the Gender Committee Guidelines, v2 dated January 2024 approved by Chief Sustainability Officer with revision in all sections of OTR to reflect current practices.
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### 3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
2219455-202207-M1	4.4.5.11 Part 3 - Major	07/07/2022	Closed on 04/10/2022
2219455-202207-M2	4.4.5.11 Part 4 - Major	07/07/2022	Closed on 04/10/2022
2219455-202207-M3	4.6.1.1 Part 3 - Major	07/07/2022	Closed on 04/10/2022
2219455-202207-N1	4.4.2.2 Part 3 - Minor	07/07/2022	Closed on 06/07/2023
2219455-202207-N2	4.5.3.2 Part 3 - Minor	07/07/2022	Closed on 06/07/2023
2219455-202207-N3	4.5.5.1 Part 3 - Minor	07/07/2022	Closed on 06/07/2023
2517951-202407-N1	4.4.5.4 Part 3 – Minor	05/07/2024	Open
2517951-202407-N2	4.4.4.1 Part 4 – Minor	05/07/2024	Open
2517951-202407-N3	4.4.5.4 Part 4 – Minor	05/07/2024	Open

### 3.5 Issues Raised by Stakeholders

Stakeholders comment	
<b>1</b>	<p><b>Issues:</b> Srx Yogxxxxxxxx Kaxx, MTxx Entxxxxxx, Kix Sxxn Lxx Traxxxxxx Sdn Bhd (contractor) The contractors have a good relationship with the estate management. The contractor has also informed by the estate of the procedure of complaint and grievance during the stakeholder meeting and during the briefing/training session with the contractor. The contractor also mentions on the payment process which was done according in the stipulated contract agreement and award of contract was delivered in unbiased tendering process.</p> <p><b>Management Responses:</b> Noted on good response, will improve more in the future.</p> <p><b>Audit Team Findings:</b> No further issue.</p>
<b>2</b>	<p><b>Issues:</b> Sekolah Jenis Kxxxx (T) Lxxxxxx Bxxxt Axxxxx The school have a very good relationship with the estate management. Verify with the school principal, the estate management is very responsive and easy to discuss with if there is any issue raised from his side. The school were also attended the stakeholder meeting and they were made to understand and aware of the complaint and grievance procedure of the estate.</p> <p><b>Management Responses:</b> Will continue to good practise to make good communication.</p> <p><b>Audit Team Findings:</b> No further issue.</p>

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<b>3</b>	<p><b>Issues:</b> Kxxxxxx Txxxx</p> <p>Good cooperation given by estate management team. Contribution not only monetary but also manpower and machinery were given if there is any assistance required. Relationship and contribution with the estate management were consistent rather than ad-hoc. Estate under SD Guthrie Berhad is known for offering job opportunity to the villager. No land encroachment from SD Guthrie Berhad estates.</p> <p><b>Management Responses:</b></p> <p>Will keep maintaining the good practise and will improve further in giving support to all stakeholders.</p> <p><b>Audit Team Findings:</b></p> <p>No further issue.</p>
<b>4</b>	<p><b>Issues:</b> Worker's representative, NUPW Representative, Gender Committee Representative</p> <p>They informed that there are no outstanding issues with the estate management. 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> <p><b>Management Responses:</b></p> <p>Will keep the good practise, all workers are asset to the company, and they will be taken care.</p> <p><b>Audit Team Findings:</b></p> <p>No further issues.</p>

### 3.6 List of Stakeholders Contacted

<p><b>Government Officer:</b></p> <p>Sekolah Jenis Kxxxx (T) Lxxxxxx Bxxxt Axxxxx</p>	<p><b>Community/neighbouring village:</b></p> <p>Kxxxxxx Txxxx</p>
<p><b>Suppliers/Contractors/Vendors:</b></p> <p>Srx Yogxxxxxxxx Kaxx, MTxx Entxxxxxx, Kix Sxxn Lxx Traxxxxxx Sdn Bhd</p>	<p><b>Worker's Representative/Gender Committee:</b></p> <p>Worker's representative, NUPW Representative, Gender Committee Representative</p>

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<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
Based on the findings during the assessment SOU 18 Diamond Jubilee Palm Oil Mill and Supply Bases Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of SOU 18 Diamond Jubilee Palm Oil Mill and Supply Bases Certification Unit is continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> Shylaja Devi Vasudevan Nair	<b>Name:</b> Farrah Sahanim Binti Paduka
<b>Company name:</b> SD Guthrie Berhad	<b>Company name:</b> BSI Services Malaysia Sdn Bhd
<b>Title:</b> Head, Sustainability Compliance Unit	<b>Title:</b> Client Manager
<b>Signature:</b> 	<b>Signature:</b> 
<b>Date:</b> 10/10/2024	<b>Date:</b> 14/08/2024

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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>	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 commitment to continual improvement. - <b>Major compliance -</b>	<p>The policy established mention that SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) are committed to making:</p> <ol style="list-style-type: none"> <li>1. Promoting Good Governance and Transparency</li> <li>2. Contributing to a better society</li> <li>3. Minimizing environmental harm</li> <li>4. Delivering sustainability quality</li> </ol> <p>This policy shall be guided by the commitment spelt out in the company's:</p> <ol style="list-style-type: none"> <li>1. Responsible Agriculture Charter (RAC)</li> <li>2. Human Right Charter (HRC)</li> </ol>	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	RSPO + MSPO Internal Audit for SOU 18 Diamond Jubilee POM and supply bases was carried out on 09/04/2024 in Diamond Jubilee Estate	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	further improvement. <b>- Major compliance -</b>	and on 02/04/2024 at Welch Estate. The audit was conducted the Group Sustainability Department.	
<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>	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Internal Audit Procedure, Doc. No.: SDP/GSD/SCU/IAP, Rev. 3 dated 10/01/2023. The frequency of the internal audit shall be carried out at least once a year and when is required. Total of 10 major NC raised, and verification through the system established, found all NCs were closed.	Complied
<b>4.1.2.3</b>	Report shall be made available to the management for their review. <b>- Major compliance -</b>	The internal audit report has distributed to the estate management. The Management Representative has acknowledged on the acceptance of the Internal Audit Report at both Diamond Jubilee Estate and Welch Estate. 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>	Diamond Jubilee Estate and Welch Estate has conducted the Management Review Meeting each on 21/06/2024 and 19/04/2024. The minutes of meeting was sighted and the meeting agenda verified discussing the following: 1. Opening by Chairman 2. Previous Meeting Minutes Review 3. Matters Arising from Previous Minutes of Meeting 4. Changes In Regulations, Standards, Policies & Procedures In Relation To Sustainability Management 5. Review On Operation Performance & Product Conformity 6. Review of Management Plan	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		7. Result From System Audits & Assessment 8. Stakeholder Feedback & Complaints 9. Resource For System Implementation 10. Continual Improvement Plan 11. Conclusion	
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p><b>- Major compliance -</b></p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) issued an inter-office mail (Ref. No.: SQM.RSPO.1811/22.11) dated 23/11/2018 regarding the statement on commitment towards MSPO implementation.</p> <p>From the memo describes company commitment on emphasizing to achieved systematic approach on ensuring continuous improvement in the operation, compliance to statutory, legal, and other regulatory requirements and establishment of traceability within the supply chain in the above-mentioned memorandum.</p> <p>Both Estates has established individual continual improvement plan include with action plan to be taken updated for year 2024. Documented review, the management identified aspect and impact covered on environmental, safety and social such as action plans for:</p> <ol style="list-style-type: none"> <li>1. Introduction of mechanical sparing using Matabi Inter pump spray for circle spraying in mature field – to reduce the labour and increase productivity.</li> <li>2. Road construction to be more focus in the field.</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		3. Restructuring the workers housing, where worker living in old block to be move to new.	
<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>	Both Diamond Jubilee and Welch Estate established annual training plan based on the training needs analysis. Review on the plan, no new technology applied. The online platform for complaints submission continuously applied and included as a topic of training.	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>	Both Diamond Jubilee and Welch Estate established annual training plan based on the training needs analysis. Review on the plan, no new technology applied. The online platform for complaints submission continuously applied and included as a topic of training.	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 disclosure that could result in negative environmental or social outcomes. <b>- Major compliance -</b>	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has implemented a Communication Procedure for both Internal and External Stakeholders. This information is presented in both English and Malay languages and is made accessible to stakeholders through notice boards at the mill. The dissemination of information is carried out to both internal and external parties through Townhall Session or External Stakeholders' Meeting. Latest external stakeholder meeting conducted was on 21/06/2024 at Diamond Jubilee Estate and 13/06/2024 at Welch Estate respectively.	Complied
<b>4.2.1.2</b>	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where	It was noted that management documents related to sustainability available at all estates during the on-site audit upon request including	Complied



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Criterion / Indicator		Assessment Findings	Compliance
	disclosure of information would result in negative environmental or social outcomes. - <b>Major compliance</b> -	sustainability policies, procedures, social and environmental assessments as well as management action plans etc. Furthermore, global documents accessible via company's website.  On the other hand, confidential documents such as financial and personal records, must not be disclosed publicly. Estate Managers holds the responsibility for managing all communication and requests for documentation that may be made available to the public or stakeholders.	
<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> -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/04/2008. The objective of the procedure is to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill. The procedure describes timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation.  Stakeholders Meeting for the year 2024 for Diamond Jubilee SOU 18 that inclusive mill and estate has been conducted on 21/06/2024 at the Club House, Diamond Jubilee Estate. The meeting was attended by school, contractor, local authorities, local community representatives, neighbours, vendors and FFB suppliers as evident in the list of attendance and minutes meeting.  Stakeholder meeting at Welch Estate was conducted on 13/06/2024.  Internal stakeholders' meeting conducted for workers through Social Dialogue on Monthly Basis.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<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. - <b>Minor compliance</b> -	<p><u>Diamond Jubilee Estate</u>  Review on the procedure, describes estate manager as person in-charge and responsible to address the communication and requests from internal and external. Estate Manager has assigned social officer to assist them to handle issues related to social in estate with appointment letter for Account Admin Officer dated 01/08/2023 signed by the Estate Manager.</p> <p><u>Welch Estate</u>  Review on the procedure, describes estate manager as person in-charge and responsible to address the communication and requests from internal and external. Estate Manager has assigned social officer to assist them to handle issues related to social in estate with appointment letter for Assistant Manager dated 01/01/2024 signed by the Estate Manager.</p>	Complied
<b>4.2.2.3</b>	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - <b>Major compliance</b> -	<p>Diamond Jubilee Estate and Welch Estate maintained the List of Stakeholders FY 2024 includes categorized as Contractors, Vendors/Suppliers, Local Community and Other Interested Parties (Government Agencies, School, Hospitals, Balai Polis, OCP etc.).</p> <p>The external stakeholder meeting was conducted on 21/06/2024 at Diamond Jubilee Estate and 13/06/2024 at Welch Estate. Minutes of meeting is available for review.</p>	Complied
<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> -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established SOP for traceability and documented in Sime Darby Plantation, Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022. Refer document no.	Complied

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Criterion / Indicator		Assessment Findings	Compliance									
		SD/SDP/GSD/SCCS/0522/01. The procedure provides guidance for estates to establish and ensure effective implementation on sustainable supply chain and traceability of certified sustainable materials (FFB).										
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	For regular inspection, SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established the SIME Semua 2.0 (CRS system) for traceability purposes. An electronic tag or chip is assigned to each load or consignment, linking it to the Semua application. Before weighing and dispatch, the chip is scanned, and all relevant information is recorded in the system. This information includes details such as the field, crop type, harvesting date, number of bunches, weight, and more. The individuals responsible for each load or consignment are the harvesting 27 mandore and bunch counter. The estate has also recorded manually the each of the load's detail in a logbook for verification purposed.	Complied									
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	<div>Estates have designated a dedicated Person In-Charge specifically tasked with overseeing traceability requirements, with the purpose of monitoring and updating the traceability system and records for the data information of Fresh Fruit Bunches (FFB). This appointment underscores the organization's commitment to maintaining accurate and reliable traceability practices. Sighted the evidence of appointment letter as table below:</div> <table><tr><th>Operating Unit</th><th>Traceability Officer</th><th>Date of Appointment</th></tr><tr><td>Diamond Jubilee Estate</td><td>Sxxx Slungxxx</td><td>10/06/2024</td></tr><tr><td>Welch Estate</td><td>Mohamad Nxxxx bin Azixxx</td><td>01/01/2024</td></tr></table>	Operating Unit	Traceability Officer	Date of Appointment	Diamond Jubilee Estate	Sxxx Slungxxx	10/06/2024	Welch Estate	Mohamad Nxxxx bin Azixxx	01/01/2024	Complied
Operating Unit	Traceability Officer	Date of Appointment										
Diamond Jubilee Estate	Sxxx Slungxxx	10/06/2024										
Welch Estate	Mohamad Nxxxx bin Azixxx	01/01/2024										

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Criterion / Indicator		Assessment Findings	Compliance																																				
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained.  - Major compliance -	The management have dispatched the freshly harvested Fresh Fruit Bunches (FFB) to Diamond Jubilee Palm Oil Mill. Additionally, the estates have diligently maintained records detailing the FFB dispatch and the FFB sent to the mill, demonstrating their commitment to effective monitoring and documentation. Upon reviewing the records of FFB dispatch, the following documentations review (sample) have been made: <table><tr><td colspan="3">Diamond Estate</td></tr><tr><td>Document</td><td>FFB Receive Ticket by Mill</td><td>FFB Receive Ticket by Mill</td></tr><tr><td>D.O Number</td><td>553216</td><td>552952</td></tr><tr><td>Date</td><td>21/06/2024</td><td>31/05/2024</td></tr><tr><td>Vehicle Number</td><td>JQS8842</td><td>JQS8842D6</td></tr><tr><td>Net Weight</td><td>10010</td><td>10,880</td></tr><tr><td colspan="3">Welch Estate</td></tr><tr><td>Document</td><td>FFB Receive Ticket by Mill</td><td>FFB Receive Ticket by Mill</td></tr><tr><td>D.O Number</td><td>4660</td><td>4578</td></tr><tr><td>Date</td><td>01/06/2024</td><td>02/05/2024</td></tr><tr><td>Vehicle Number</td><td>WTM4130</td><td>WTM4130</td></tr><tr><td>Net Weight</td><td>9910 Kg</td><td>12680 kg</td></tr></table>	Diamond Estate			Document	FFB Receive Ticket by Mill	FFB Receive Ticket by Mill	D.O Number	553216	552952	Date	21/06/2024	31/05/2024	Vehicle Number	JQS8842	JQS8842D6	Net Weight	10010	10,880	Welch Estate			Document	FFB Receive Ticket by Mill	FFB Receive Ticket by Mill	D.O Number	4660	4578	Date	01/06/2024	02/05/2024	Vehicle Number	WTM4130	WTM4130	Net Weight	9910 Kg	12680 kg	Complied
			Diamond Estate																																				
			Document	FFB Receive Ticket by Mill	FFB Receive Ticket by Mill																																		
			D.O Number	553216	552952																																		
			Date	21/06/2024	31/05/2024																																		
			Vehicle Number	JQS8842	JQS8842D6																																		
			Net Weight	10010	10,880																																		
			Welch Estate																																				
			Document	FFB Receive Ticket by Mill	FFB Receive Ticket by Mill																																		
			D.O Number	4660	4578																																		
			Date	01/06/2024	02/05/2024																																		
			Vehicle Number	WTM4130	WTM4130																																		
			Net Weight	9910 Kg	12680 kg																																		

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p><u>Welch Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB License- 522499002000 expired on 31/07/2024, Lesen menjual dan mengalih buah sawit</li> <li>2. Perakuan kelayakan, Pengandung tekanan tak berapi; PMT- JH/23 205436 expired on 16/07/2024</li> <li>3. Diesel and petrol storage licenses- JH(SGR) 0168/11 PSK expired on 11/08/2024 (diesel;54600Lt, petrol; 270lt)</li> <li>4. Weighbridge calibration serial number B345967492 dated 15/05/2024</li> </ol> <p><u>Diamond Jubilee Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB licenses (Nursery) – 550648011000 expired dated 30/06/2025</li> <li>1. MPOB license-522967002000 expired 31/08/2024</li> <li>2. Diesel and petrol storage licenses- M001059 expired on 11/08/2024</li> <li>3. Water abstraction licences; 31/12/2024</li> <li>4. Diesel and petrol storage licenses: L0000438-08 expired on 30/04/2025</li> </ol>	
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>All operating units have Legal &amp; Other Requirements Register (LORR) covering all the necessary regulatory requirements. Refer to Legal Register with addition to applicable laws since last assessment as follows:</p> <ol style="list-style-type: none"> <li>1. Whistleblower Protection Act 2010</li> <li>2. Minimum Wages Order 2022, Amendment 2022</li> <li>3. Fire Services Act 1988 (Act 341) Amendment 2020</li> </ol>	Complied

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		4. "Pembangunan Sumber Manusia Berhad" Act 2000 5. Anti-Sexual Harassment Act 2021 6. Employees' Social Security (Amendment) Act 2022 7. Employment Insurance System (EIS) (Amendment) Act 2022 8. Control of Supplies Act 1961 9. Employment (Amendment) Act 2022 10. Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit 2021	
<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 procedure has 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. A mechanism to ensure compliance to legal and other requirement has been documented in EQMS (Estate Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 18.  Group Sustainability Department (GSD) 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.	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>	<u>Diamond Jubilee</u> Ms Sxxx Slungxxxx Assistant Manager has been appointed as person in charge for compliance legal requirement base on the appointment letter dated 10/06/2024. <u>Welch Estate</u>	Complied

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		Mr Mohammad Naxxx bin Azixxx has been appointed as person in charge for compliance legal requirement base on the appointment letter 13/05/2024.	
<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. - <b>Major compliance</b> -	Diamond Jubilee Estate and Welch Estate demonstrated with legal ownership or leases with legal documents. Therefore, the estates cultivation activities have not diminished the land use rights of other users. Onsite visit verified there no evidence to show that oil palm cultivation activities had diminished the land use rights of others.	Complied
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - <b>Major compliance</b> -	Diamond Jubilee Estate and Welch Estate 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. <u>Diamond Jubilee Estate</u> Verified that the management maintained the current total of 32 land titles. Copies of land titles were available as per sample sighted as follow. 1. Land title no.: 00020xxx. 2. Land title no.: 00020xxx. 3. Land title no.: 00030xxx. 4. Land title no.: 00020xxx. 5. Land title no.: 00022xxx.	Complied

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		<p>While for Welch Estate, there are 6 registered land title under Segamat district. Detail of land title as per below</p> <p>1.Land title no.: CT2xxx total 403.8762Ha</p> <p>2.Land title no.: 438xxx total 302.2280Ha</p> <p>3.Land title no.: 92xxxx total 254.4457Ha</p>	
<b>4.3.2.3</b>	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p><b>- Major compliance -</b></p>	<p>Diamond Jubilee Estate and Welch 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 poles) were present along the perimeter boundary. There was no evidence of plantings beyond the perimeter boundary, as verified during the site visit.</p> <p>All the audited units have boundary stones or markers adjacent to forest reserves or neighboring properties, as indicated on the 'GPS Surveyed Map' and verified at each site.</p>	Complied
<b>4.3.2.4</b>	<p>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).</p> <p><b>- Minor compliance -</b></p>	<p>There was no land dispute at all sampled estates. SD Guthrie Berhad (formerly known as Sime Darby Plantation Sdn Bhd) has the legal ownership documents as demonstrated by possessing land titles.</p>	N/A
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	<p>Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.</p>	<p>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 Plantation Sdn Bhd) and has been</p>	N/A



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	- <b>Major compliance</b> -	verified based on land title.	
<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 Plantation Sdn Bhd) and has been verified based on land title.	N/A
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - <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 Plantation Sdn Bhd) and has been verified base on land title.	N/A
<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 impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - <b>Minor compliance</b> -	The Diamond Jubilee Estate and Welch Estate have maintained the current Social Impact Assessment (SIA) for SOU 18, conducted by the Group Sustainability Department. This assessment, covering the Diamond Jubilee POM, Diamond Jubilee Estate, and Bukit Asahan Estate, was conducted from July 12 to July 15, 2016. The objectives were to identify existing social issues and develop a social management plan. Stakeholder participation was included, with an attendance list sighted. Issues raised by stakeholders were recorded in the SIA report.  For 2024, the SIA Management Plan was updated for both Welch Estate and Diamond Jubilee Estate. The assessment identified both negative and positive impacts, which have been documented in the plan. The implementation was verified at both the operational unit and	Complied

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		individual site levels, addressing issues such as worker complaints, housing complex areas, and management concerns.	
<b>Criterion 4.4.2: Complaints and grievances</b>			
<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 (formerly known as Sime Darby Plantation Berhad) established Standard Operation Manual, Procedure for External communication, version 1 Year 2008, Issue No 1 with no changes since dated 01/04/2008. The objective of the procedure is to ease the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/04/2008. The objective of the procedure is to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill and estates. The procedure describes timeframe for external communication to provide feedback within two weeks of 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>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established whistleblowing platform named as 'Suara Kami' for internal and external stakeholders to lodge on any grievance. The grievance mechanism can be access through <a href="#">Human Rights   SD Guthrie</a></p> <p>In additional, SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established new online platform named as 'Oil Palm Pal' (OPP) and Workers Housing Management Procedure dated 26/11/2021 as guideline to certification unit's management in</p>	Complied

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		providing a safe, liveable workers housing condition including the process of handling housing repair. The procedure describes the timeline to investigate/ inspect the housing defect based on the risk category.	
<b>4.4.2.2</b>	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> -	<p>Diamond Jubilee Estate adopt SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) HQ Oil Palm Pal (OPP) online platform to record any housing repair from workers.</p> <p>Based on the records, all the complaints were lodged on defects of housing facility, and request of facility (e.g., room door damage, lamp malfunctions, etc.).</p> <p>There was no complaint or grievance lodged by external stakeholder since the last assessment. Verification of the records of complaints lodged the actions taken by the management were found to be appropriate and timely manner.</p> <p>Any communication/request/grievances from external stakeholder were recorded in the visit logbook, stakeholders' minutes meetings, Social Dialogue Action Tracker, and OPP system report. External stakeholders' meeting conducted for Diamond Jubilee Estate and Welch Estate. The meeting was attended by school, contractor, local authorities, local community representatives, neighbours, vendors and FFB suppliers.</p> <p>Internal stakeholders' meeting conducted for workers through Social Dialogue on Weekly Basis discuss on workers issues related to housing and workers' benefits.</p>	Complied
<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.	Diamond Jubilee Estate and Welch Estate adopt SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) HQ Oil Palm Pal (OPP) online platform to record any housing repair from workers.	Complied

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	- Minor compliance -	The platform is available with QR code that has been displayed at each worker house door, and the management also has established manual complain platform through Complaint Book available at the office. Onsite interviewed with attended external stakeholders informed they are aware of the complaint mechanism.	
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Employees and the surrounding communities were made aware that complaints or suggestions can be made any time through various meetings such as morning muster, training/briefing, and stakeholder consultation. Based on interview with the stakeholders, it was noted that they were aware of the complaint's procedure including the platform of 'Suara kami', Whistle Blowing, Workers Helpline, Oil Palm Pal (OPP) and Social Dialogue and they were briefed by the management during stakeholder meeting and morning briefing.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Diamond Jubilee and Welch Estate maintained complaints record and resolutions record over the past 24 months were still available as at audit.	Complied
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	Diamond Jubilee Estate and Welch Estate offer job opportunity to local communities, contribute donations to nearby internal and external stakeholders as below: 1. Rice contribution to all workers 2. Beef contribution to muslim worker during Eid. 3. Cleaning of school in the estate.	Complied

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<b>Criterion 4.4.4:</b> Employees safety and health			
<b>4.4.4.1</b>	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. <b>- Major compliance -</b>	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 05/05/2022. The estates have established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2024. The management plan includes the ESH Risk Management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring. The policy was briefed to all workers during the muster call.	Complied
<b>4.4.4.2</b>	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied 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). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe	The occupational safety and health plan cover the following: a) SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 05/05/2022. The policy has been communicated to the staffs and workers through induction training for new workers, morning briefing and displayed at various notice boards within the estate. The policy has been briefed to all workers during the muster call. b) SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) have established Standard Operating Procedure for OSH Risk Assessment – UM/HSE/SP/01 dated 09/03/2021. Both estates have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations. Among the activities verified in the HIRARC included the processing activities (Harvesting, Manuring and Spraying) and maintenance activities	Complied

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<p>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 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>	<p>(Workshop). Sample has been taken for fogging, mechanized chemical spraying using ST GEO and, pesticides application using drone.</p> <p><u>Diamond Jubilee Estate</u></p> <p>Chemical Hazard Risk Assessment (CHRA) conduct by Nxxxxxxx Cxxxxxxxxx in July 2020 done by Nxx Kxxxxxxxxx Lxxxxx bxxxx Axxxx DOSH registration number HQ/15/ASS/00/363 dated 08/07/2020.</p> <p>Medical surveillance conducted by Klinik Txxx Axxx Kxxx on 05/02/2024 and 07/02/2024 for 13 workers that handling chemical, and the report prepared by Dr. Nxx Hxxxxx Mx Axxx, Public Health Physician and 3 workers has been identified with High Manganese in blood and recommend for medical removal protection (MRP) within 3 months. MRP has been done 17/05/2024 for all 3 workers and has been identified fit to works and required to go for medical surveillance every 12 months.</p> <p>Noise risk assessment (NRA) conducted by Nur Izzati Salleh NRA registration number HQ/16/PEB/00/158 on 10/08/2020 report reference HQ/LPROYKPEB/21/00298.</p> <p>Audiometric test has been conducted on 05, 06,07/2/2024 for 24 workers where 2 workers has been identified with hearing impairment and need to be reassessed within 3 months. Reassessment conducted on 20/03/2024 and has been recommended for annual surveillance.</p> <p><u>Welch Estate</u></p> <p>Chemical Hazard Risk Assessment (CHRA) has been conducted on 10/06/2020 by Mrs. Nxx Kxxxxxxxxx Lxxxxx bxxxx Axxxx DOSH</p>	

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	<p>registration No. HQ.15/ASS/00/363 and DOSH reference number HQ/15/ASS/00/363-2020-084.</p> <p>Noise risk assessment (NRA) conducted on 15/07/2020 report reference HQ/LPROYKPEB/20/00272 conducted by Ms Nxx Ixxxxx Sxxxxx.</p> <p>Medical surveillance has been conducted on 12/02/2024 for 11 workers which include sprayer, manurer and workshop attendance and all workers has been classified as fit to work.</p> <p>Audiometric test conducted on 13-14/02/2024 for 8 workers and there is no hearing impairment has been identified.</p> <p>c) Both operating units have established a training program for employees exposed to chemicals used at the palm oil estates to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager, and representative from the chemical suppliers to the supervisors and operators. Sighted the Training records as follows.</p> <p><u>Diamond Jubilee Estate</u></p> <ul style="list-style-type: none"> <li>• Chemical safety awareness training – 20/06/2024</li> <li>• Briefing on effective OSH Committee – 25/01/2024</li> <li>• Harvesting competency training program (HCTP)- 19/02/2024</li> </ul> <p><u>Welch Estate</u></p> <ul style="list-style-type: none"> <li>• Emergency response training- 09/01/2024</li> <li>• Chemical safety awareness- 23/03/2024</li> <li>• Workplace hazard awareness training- 30/05/2024</li> </ul> <p>d) The estate have provided appropriate PPE to all workers according</p>	

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		<p>to the job type and requirements. The PPE given as per HIRARC and PPE matrix.</p> <p>Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>e) Standard Operating Procedures for Handling of Chemicals were available in several documents such as:</p> <ul style="list-style-type: none"> <li>– SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad), Chemical Safety Management Procedure; Document No.UM/HSE/OCP/04 dated 09/03/2021.</li> </ul> <p>f) <u>Diamond Jubilee Estate</u></p> <p>The Estate Manager, Mr Ahmadi Ahmad Mokhtar was appointed to be the Chairman of OSH Committee at the estate as stated in the appointment letter. The management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Manager.</p> <p><u>Welch Estate</u></p> <p>The Estate Manager, Mr Ikram Mohd Safian was appointed to be the Chairman of OSH Committee at the estate as stated in the appointment letter dated 01/05/2024 that has been signed by Mr Tang Men Kon, Regional chief executive officer. The management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Manager.</p> <p>g) The management conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur.</p>	



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		<p>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.</p> <p>Diamond Jubilee Estate</p> <p>OSH meeting conducted every 3 months and latest meeting has been conducted on 25/01/2024 and 23/04/2024.</p> <p>Welch Estate</p> <p>OSH meeting has been conducted on 08/03/2024 and 30/05/2024</p> <p>h) Accident and Emergency procedures were available in the ESH Management System Manual; Emergency Preparedness &amp; Response Procedures; Doc No: UM/HSE/SP/02 Date 17/11/2021.</p> <p>The mill has established Emergency Response Team lead by the mill Managers. The ERT chart and Fire Extinguisher Map was also available and verified. As per interview with sample workers, there is evidence that all workers.</p> <p>Emergency Response Training was conducted as below:</p> <p>Diamond Jubilee Estate- 29/06/2024</p> <p>Welch Estate- 09/01/2024</p> <p>i) Training for 1<sup>st</sup> aid conducted on 29/03/2024 for Diamond Jubilee Estate and for Welch Estate, it has been conducted on 09/01/2024 and 26/07/2024. As per verification, there is evidence that 1<sup>st</sup> aid has been maintained in every operation which are reachable if there is any emergency cases. All items has been verified up to date and check monthly by medical assistant.</p> <p>j) <u>Diamond Jubilee Estate</u></p>	

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		<p>There were 2 accidents case for the year 2023 reported in the estate. The JKKP 8 form has been submitted to DOSH for the year ending 2023 on 08/01/2024 (Ref No: JKKP8/128523/2023) and documents available for verification. JKKP 6 has been submitted for both accidents including the investigation report.</p> <p><u>Welch Estate</u></p> <p>There were 11 accidents case for the year 2023 with working hours lost reported with total 11 days. The JKKP 8 form has been submitted to DOSH for the year ending 2023 on 03/01/2024 and documents available for verification.</p>	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	<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><b>- Major compliance -</b></p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established Group Sustainability &amp; Quality Policy signed Group Managing Director dated 02/12/2019. The policy is the commitment by the company in respecting, upholding &amp; no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established Policy on the Protection of Human Rights Defenders (HRDs) with effective date on 25/03/2020. The policy is the commitment of the company in respect and safeguard human rights, notion of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SD Guthrie Berhad. This Policy is applied to all stakeholders affected by the</p>	Complied

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		business activities and relationships including directors, employees, counterparties, business partners, workers in our operations and supply chains, and communities surrounding our operations. The policy was communicated to employees at Welch Estate on 21/06/2024.	
<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>	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established 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.	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>	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established employment contract for workers. The employment contract adopts by Diamond Jubilee Estate as part as requirement to ensure the workers employment conditions received as accordingly. Review on the sampled of employment contracts verified terms and conditions outlined as per collective agreement and Employment Act 1955. The original copy kept by management demonstrated in workers' origin language and signed by the worker. Onsite interview with sampled workers informed they have been briefed on the employment conditions and benefits as stated in	Complied

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		<p>employment contract. They have also been handed a copy of the contract for own selves keeping and reference.</p> <p>Reviewed of 16 samples from Diamond Jubilee Estate and 8 samples from Welch Estate found that the workers were paid accordingly. Sample taken for the month of May 2024, January 2024, and November 2023.</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>It is verified that the Contractor has submitted the Employment Contract, Salary Slip, EPF Statement, and SOCSO Statement to the both estate visited.</p> <p>Sample taken at Diamond Jubilee Estate – Ponxxx Entxxxxxx (Contractor) salary slip, and EPF statement found that one worker with IC No; 6005XX-XX-XXXX, found that there is no EPF Employer contribution for the specific worker. This is not inline with Third Schedule of EPF Act 1991. Thus, the Minor NC is raised.</p>	Minor Non Conformance
<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>Diamond Jubilee Estate and Welch Estate registered all their workers into Employee Master Details List.</p> <p>Review on the listing included workers' personal details such as full name, gender, date of birth, date join company, race, designation, and wages were available.</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>Diamond Jubilee Estate and Welch Estate employed local and foreign workers and registered into Employee Master Details List. Review on the listing, verified all workers are employed by estate management.</p> <p>Reviewed of 16 samples from Diamond Jubilee Estate and 8 samples from Welch Estate on the contract with terms and conditions applied according to Collective Agreement and Employment Act 1955. Evident</p>	Complied

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		the employment contract between contractor and employees as stated in 4.4.5.4.	
<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>	Diamond Jubilee Estate and Welch Estate registered all their workers into Employee Master Details List. All the daily attendance and overtime work were recorded in the Daily attendance record and payroll system. Onsite interview with sampled workers informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers including compliance by contractor as per their Letter of Award.	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 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>	Diamond Jubilee Estate and Welch Estate registered all their workers into Employee Master Details List. All the daily attendance and overtime work were recorded in the Daily attendance record and payroll system. Onsite interview with sampled workers informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers including compliance by contractor as per their Letter of Award.	Complied
<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>	Diamond Jubilee Estate and Welch Estate manage workers' payslip through SAP system. 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	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) through Diamond Jubilee Estate and Welch Estate contributed 10 kg of rice once every 2 months for all their workers as evident in the	Complied

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	development, medical care and health provisions. - <b>Minor compliance</b> -	payslip. Apart from that, all the workers are provided with free medical facilities located at Diamond Jubilee Estate. 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 including subsidised electricity and water (35gallons), mosque, temples, hall, playground, creche, kindergarten (KEMAS), school bus, allowances, bonuses, etc.  The gender i.e. actively cooperates with Government Clinic (Klinik Kesihatan) for female annual medical check-up such as Pap-smear.	
<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> -	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'.  To provide guidance to management in providing a safe, livable workers housing condition in accordance with Workers Minimum Standard of Housing & Amenities (Amendment) 2021 (Act A 1604). To integrate all past policies related to workers housing & amenities management in the operating units.  Diamond Jubilee Estate and Welch Estate provided free housing facilities to staff and employees. Basic amenities such as water, electricity, football field etc. were provided to the workers. The housing condition was in accordance with the 'Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446)  Interview with the workers confirmed that they did not have any complaint or grievance related to housing to be reported.	Complied

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		Verification on the housing inspection checklist and site visit found their correlation between the checklist and actual condition. The management of both estates has conducted weekly housing inspection. Verification made through the checklist.	
<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>	<p>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.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) issued Inter-Office Mail (Ref. No.: CEOUM/064/10/2022) dated 11/10/2022 with topic 'Non-conformity on Gender Committee Meeting Frequency' from CEO, Upstream Malaysia' has incorporated its policy on violence and sexual harassment in the "Group Sustainability &amp; Quality Policy Statement" mention in Indicator 4.1.1.2 where the management is committed to prevent sexual harassment and other forms of violence. Interview with gender committee and woman workers representative showed no evidence of sexual harassment or violence happened so far.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established Gender Committee Guidelines, v2 dated January 2024 approved by Chief Sustainability Officer with revision in all sections of OTR to reflect current practices.</p>	Complied

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		Gender Committee was established in Diamond Jubilee Estate and Welch Estate to monitor and take appropriate action if there is any case of sexual harassment or violence that has been reported.	
<b>4.4.5.13</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established 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 respect the rights of their employees to form and join unions and bargain collectively.</p> <p>Social Dialogue was carried out by the management of Diamond Jubilee Estate and Welch Estate with workers to update the progress of action taken for the issues raised by workers. The initiative will discuss during management review meeting and action taken accordingly. All issues will be uploaded into Social Dialogue Online Tracker System (SDOTS) for monitoring.</p> <p>Verified the records of monitoring of issues and evidence of actions taken to resolve the issues raised by the workers. The workers that involved in the Social Dialogue were NUPW representatives, Gender Committee representatives and others' nationalities representatives. Diamond Jubilee POM management allowed their workers to form or join any association such as NUPW. Document reviewed on their payslip found that they are deducted for the NUPW subscription fees of RM 8 monthly.</p> <p>Interview with the workers informed they have freedom to join any association without any interference by management.</p>	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	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established Human Rights Charter last revised 2020 where they have	Complied



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	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>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 recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. They are eradicating child labour in all their supply chain and not employ anyone underage of 18 years.</p> <p>Document review workers master list confirmed Diamond Jubilee Estate has not employed any child labour in operations.</p>	
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	<p>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>Both operating units have established a training program for all workers based on the training need analysis conducted on a yearly basis.</p> <p>Records of trainings were maintained by the estates as below:</p> <p><u>Welch Estate</u></p> <ol style="list-style-type: none"> <li>1. Briefing on grievance channel- 05/02/2024</li> <li>2. Tractor and drivers, hearing conservation and &amp; foreman safety awareness training- 08/01/2024</li> <li>3. Schedule waste management- 26/06/2024</li> <li>4. Briefing on pay slips &amp; wages deduction- 21/06/2024.</li> <li>5. Awareness on High conservation value- 26/06/2024</li> </ol> <p><u>Diamond Jubilee Estate</u></p> <ol style="list-style-type: none"> <li>1. 1<sup>st</sup> aid training -29/03/2024</li> <li>2. Emergency Response Training- 29/06/2024</li> </ol>	Complied

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		3. Briefing on effective OSH Committee – 25/01/2024 4. Harvesting competency training program (HCTP)- 19/02/2024	
<b>4.4.6.2</b>	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>	Both operating units have conducted training need analysis for all employees, management, and contractors. The training need analysis was conducted based on the job designation and training required by the job type which is incorporated in the training plan for year 2024. Sample of training plan is as the following: 3.6.1.1 Schedule Waste Management 3.6.1.2 PPE Training 3.6.1.3 Hearing Conservation Training 3.6.1.4 HCV Training 3.6.1.5 Fire Drill Training 3.6.1.6 COBC Training 3.6.1.7 Sexual Harassment Briefing 3.6.1.8 Payslip Training 3.6.1.9 OSH Committee Function & Responsibility + Workplace Inspection Training	Complied
<b>4.4.6.3</b>	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 available in the Annual Training Programme 2024. The trainings were sighted to have been sub categorised to trainings on Environmental, SOP, Social and OSH.	Complied
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			

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<b>Criterion 4.5.1:</b> Environmental Management Plan			
<b>4.5.1.1</b>	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>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has implemented an environmental policy, which is documented in the Group Sustainability and Quality Statement signed by the Group Managing Director on 2/12/2019. Additionally, the Upstream Malaysia Health, Safety, and Environment (HSE) Policy Statement, signed by the CEO Upstream Malaysia on 1/6/2020, further reinforces the company's commitment to environmental responsibility.</p> <p>In the Policy stated commitment of SDP to minimizing Environmental Harm by:</p> <ul style="list-style-type: none"> <li>• Protecting and enhancing biodiversity and ecosystem</li> <li>• No deforestation and No new development on peat land</li> <li>• Enhancing resilience against climate change impact</li> <li>• Adopting responsible consumption and production</li> </ul> <p>Additionally, similar commitment has been displayed by Health, Safety and Environment (HSE) Department from Upstream Malaysia Division to:</p> <ul style="list-style-type: none"> <li>• Comply to emission and effluent standard</li> <li>• Efficient use of water and energy</li> <li>• Minimize waste</li> <li>• Protect the ecosystem and biodiversity</li> </ul>	Complied
<b>4.5.1.2</b>	The environmental management plan shall cover the following: a) An environmental policy and objectives;	The estates have established Environment Impact Assessment and environmental management plan base on assessment conducted.	Complied

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	b) The aspects and impacts analysis of all operations. - Major compliance -	<p>Annual review was conducted based on legal updates, changes of operation and activity as table below:</p> <table><tr><td>Operating Unit</td><td>Date of EIA Update</td></tr><tr><td>Diamond Jubilee Estate</td><td>01/05/2024</td></tr><tr><td>Welch Estate</td><td>08/03/2024</td></tr></table> <p>Activities and operation that are updated in the assessment are:</p> <ul style="list-style-type: none"><li>• Lining, holing &amp; plantation.</li><li>• LLC Establishment</li><li>• Land clearing</li><li>• Road construction</li><li>• Path/terrace construction</li><li>• Drains &amp; Pits Construction</li></ul>	Operating Unit	Date of EIA Update	Diamond Jubilee Estate	01/05/2024	Welch Estate	08/03/2024	
Operating Unit	Date of EIA Update								
Diamond Jubilee Estate	01/05/2024								
Welch Estate	08/03/2024								
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 -	<p>Each estate has established Environment Improvement Plan (EIP) reviewed annually which include of the mitigation plans of negative impacts and promote plan of the positive impacts for estate activity. Table below shown key point of the plan for each estate:</p> <table><tr><td>Estate</td><td>Objective</td><td>Action</td></tr><tr><td>Diamond Jubilee Estate</td><td>Improvement in operation and place of work</td><td>Restacking of fronds for easy access of vehicles  Introduction of mechanical spraying using ST Geo for circle spraying mature field to reduce labour dependency, wastage and pollution</td></tr></table>	Estate	Objective	Action	Diamond Jubilee Estate	Improvement in operation and place of work	Restacking of fronds for easy access of vehicles  Introduction of mechanical spraying using ST Geo for circle spraying mature field to reduce labour dependency, wastage and pollution	Complied
Estate	Objective	Action							
Diamond Jubilee Estate	Improvement in operation and place of work	Restacking of fronds for easy access of vehicles  Introduction of mechanical spraying using ST Geo for circle spraying mature field to reduce labour dependency, wastage and pollution							

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Criterion / Indicator		Assessment Findings			Compliance
		Welch Estate	Improvement in operation and place of work	Introduction of mechanical spraying using Matabi Interpump spray for circle spraying mature field to reduce labour dependency, and increase productivity	
		<p>In addition, it was found that the action taken is effectively implemented as verified during site visit at all two (2) estates and documentation review, for example:</p> <ul style="list-style-type: none"> <li>• Inventory of scheduled waste generated was recorded in the eSWIS system on monthly basis. Record inventory of SW from January 2023 to June 2024 were presented to the audit team.</li> <li>• Maintenance programme for estate vehicle was recorded in the workshop notice board.</li> <li>• Recycling bins provided in the office area and in workers living quarters to promotes recycling.</li> </ul>			
<b>4.5.1.4</b>	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p><b>- Minor compliance -</b></p>	<p>The estate's programme to promote the positive impacts was developed and recorded in Environmental Management Plan Year 2024 is available for Diamond Jubilee and Welch Estate. Generally, among programme to promote positive impacts listed in the plan are as follows:</p> <ul style="list-style-type: none"> <li>• Optimize IPM practices to reduce reliance of chemical application for palm disease treatment.</li> <li>• Beneficial plant planting.</li> <li>• Proper disposal of waste in accordance to SOP and legal requirements</li> <li>• Maximize mechanization for estates operations.</li> </ul>			Complied

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Criterion / Indicator		Assessment Findings	Compliance																																				
		<ul style="list-style-type: none"><li>Reduction in use of pesticides through implementation of IPM (Barn Owl Boxes).</li><li>Planting of LCC to prevent RB breeding and depress weed growth.</li><li>EFB mulching.</li></ul> Verify during site visit and documentation review found that the programme to promote the positive impacts has been implemented by the estate management																																					
4.5.1.5	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.  - Major compliance -	<p>The estates continuously provided training to the employee to ensure the understanding on the environmental policy, objectives, and management plans. Sighted the evidence:</p> <table><tr><th>No</th><th>Description</th><th>Date</th></tr><tr><td colspan="3">Diamond Jubilee Estate</td></tr><tr><td>1.</td><td>Refresher briefing to PIC regarding schedule waste management</td><td>28/06/2024</td></tr><tr><td>2.</td><td>Training SOP and chemical handling for all PIC</td><td>20/06/2024</td></tr><tr><td>3.</td><td>Labelling container with skull symbol</td><td>28/06/2024</td></tr><tr><td>4.</td><td>Collected schedule waste (SW) and Industrial waste at Scrap Yard area</td><td>28/06/2024</td></tr><tr><td>5.</td><td>In house training on EIA, EIE and High Conservation Value training</td><td>03/05/2024</td></tr><tr><td colspan="3">Welch Estate</td></tr><tr><td>1.</td><td>Briefing on HCV awareness, open burning, schedule waste to all employees</td><td>26/06/2024</td></tr><tr><td>2.</td><td>HCV training</td><td>21/06/2024</td></tr><tr><td>3.</td><td>Chemical handling training</td><td>26/06/2024</td></tr><tr><td>4.</td><td>Scheduled Waste Training</td><td>21/06/2024</td></tr></table>	No	Description	Date	Diamond Jubilee Estate			1.	Refresher briefing to PIC regarding schedule waste management	28/06/2024	2.	Training SOP and chemical handling for all PIC	20/06/2024	3.	Labelling container with skull symbol	28/06/2024	4.	Collected schedule waste (SW) and Industrial waste at Scrap Yard area	28/06/2024	5.	In house training on EIA, EIE and High Conservation Value training	03/05/2024	Welch Estate			1.	Briefing on HCV awareness, open burning, schedule waste to all employees	26/06/2024	2.	HCV training	21/06/2024	3.	Chemical handling training	26/06/2024	4.	Scheduled Waste Training	21/06/2024	Complied
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		5.	In house EAI, EIE & High Conservation Value training	03/05/2024		
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	The estates visited discussed the issues on environmental concern during Environmental, Safety and Health committee meeting conducted on quarterly basis. The agenda the meeting commonly on zero burning, domestic waste management and environment related matters and details of meeting conducted as table below:			Complied	
		Operating Unit		Date of latest meeting		
		Diamond Jubilee Estate		23/04/2024		
		Welch Estate		30/05/2024		
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 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. - Major compliance -	The estate has established Non-Renewable Energy Monitoring Plan. Reviewed implementation of the plan as follows:  Estates monitor their consumption of diesel, electricity, and water usage and was closely monitor with baseline value for each of the non-renewable energy. Average baseline is such as follows:  Diesel: 1.31 Electricity: 4.68			Complied	
		Diamond Jubilee Estate		Diesel/FFB Ration (litre/mt)		Electricity/FFB Ratio (kWh/mt)
		Oct '23		1.04		3.61
		Nov '23		1.21		3.79
		Dec '23		1.45		3.87
		Jan '24		1.54		3.72
		Feb '24		1.85		5.98
		Mar '24		1.48		5.94

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		Apr '24	1.28	4.84	
		May '24	1.32	4.08	
		June '24	1.13	3.64	
		Average baseline for Welch Estate is such as follows: Diesel: 2.84 Electricity: 22.79			
		Welch Estate	Diesel/FFB Ratio (litre/mt)	Electricity/FFB Ratio (kWh/mt)	
		Jan 2023	4.88	29.25	
		Feb 2023	4.31	26.12	
		Mar 2023	4.50	27.24	
		Apr 2023	3.15	33.47	
		May 2023	3.42	32.55	
		Jun 2023	4.17	36.45	
		Jul 2023	2.81	22.10	
		Aug 2023	2.67	19.05	
		Sep 2023	2.15	18.15	
		Oct 2023	1.72	20.33	
		Nov 2023	2.02	21.28	
		Dec 2023	2.69	22.94	
		Jan 2024	2.79	19.52	
		Feb 2024	3.00	22.29	
		Mar 2024	2.92	22.93	
		Apr 2024	1.95	20.76	
		May 2024	2.28	16.37	
		June 2024	2.14	21.43	



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		<p>The usage of electricity is above the baseline average is because of the high utilisation due to increase of resident in housing complex. Other than that, the diesel usage is also above the average because of the high utilisation on FFB evacuation due to surplus crop versus budget.</p> <p>Plan to assess usage of diesel is available in Energy Management Plan dated 31/01/2024. Example of plan are as follow:</p> <table border="1"> <thead> <tr> <th>Category</th><th>Types/Location</th><th>Action</th><th>Frequency</th></tr> </thead> <tbody> <tr> <td>Electricity</td><td>Worker's housing, office area</td><td>Worker's housing inspection to ensure no illegal wiring</td><td>Weekly</td></tr> <tr> <td>Diesel</td><td>Transport machineries</td><td>Preventive maintenance programme for estate vehicle</td><td>Daily</td></tr> </tbody> </table>	Category	Types/Location	Action	Frequency	Electricity	Worker's housing, office area	Worker's housing inspection to ensure no illegal wiring	Weekly	Diesel	Transport machineries	Preventive maintenance programme for estate vehicle	Daily	
Category	Types/Location	Action	Frequency												
Electricity	Worker's housing, office area	Worker's housing inspection to ensure no illegal wiring	Weekly												
Diesel	Transport machineries	Preventive maintenance programme for estate vehicle	Daily												
<b>4.5.2.2</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>The estimate for the direct usage of non-renewable energy for estate operations, including diesel and electricity, to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the estate yearly budgets. Refer to the indicator 4.5.2.1 above, figures were extracted from the diesel issuance of estate diesel tank and electricity monthly bill from TNB.</p>	Complied												
<b>4.5.2.3</b>	<p>The use of renewable energy should be applied where possible.</p> <p><b>- Minor compliance -</b></p>	<p>No usage of renewable energy at the estate.</p>	Complied												
<b>Criterion 4.5.3: Waste management and disposal</b>															

Criterion / Indicator		Assessment Findings	Compliance																	
4.5.3.1	All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b>	<div>Waste products and sources of pollution are identified and documented in the estate's 'Waste Management Plan' that was available in the Environmental Management Plan for all estates. The waste is categorized as follows:</div> <table><tr><td>Source of waste</td><td>Category</td></tr><tr><td rowspan="2">Domestic Waste</td><td>Household &amp; general waste (workers housing complex, office, workshop, store)</td></tr><tr><td>Sewage (septic tank at workers housing complex &amp; office)</td></tr><tr><td>Industrial Waste</td><td>Scrap Metal yard</td></tr><tr><td rowspan="4">Scheduled Waste</td><td>Used lubricant</td></tr><tr><td>Used hydraulic oil</td></tr><tr><td>Clinical waste</td></tr><tr><td>Empty chemical container</td></tr><tr><td rowspan="2">Recycleable Waste</td><td>Contaminated rags, glove and other PPE</td></tr><tr><td>Empty Pesticide Container</td></tr><tr><td></td><td>Fertilizer bags</td></tr></table>	Source of waste	Category	Domestic Waste	Household & general waste (workers housing complex, office, workshop, store)	Sewage (septic tank at workers housing complex & office)	Industrial Waste	Scrap Metal yard	Scheduled Waste	Used lubricant	Used hydraulic oil	Clinical waste	Empty chemical container	Recycleable Waste	Contaminated rags, glove and other PPE	Empty Pesticide Container		Fertilizer bags	Complied
Source of waste	Category																			
Domestic Waste	Household & general waste (workers housing complex, office, workshop, store)																			
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	Used hydraulic oil																			
	Clinical waste																			
	Empty chemical container																			
Recycleable Waste	Contaminated rags, glove and other PPE																			
	Empty Pesticide Container																			
	Fertilizer bags																			
4.5.3.2	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 value-added by-products <b>- Major compliance -</b>	<div>Sighted and verified the document of Waste Management Plan updated for 2024 for both estates as table below:</div> <table><tr><td>Category</td><td>Types</td><td>Action Plan</td></tr><tr><td>Domestic Waste</td><td>Household &amp; general waste (workers housing complex, office, workshop, store)</td><td>Arrangement of tractor to collect domestic waste from office and workers house complex in black bins to bin collection.  Disposal by contractor</td></tr></table>	Category	Types	Action Plan	Domestic Waste	Household & general waste (workers housing complex, office, workshop, store)	Arrangement of tractor to collect domestic waste from office and workers house complex in black bins to bin collection.  Disposal by contractor	Complied											
Category	Types	Action Plan																		
Domestic Waste	Household & general waste (workers housing complex, office, workshop, store)	Arrangement of tractor to collect domestic waste from office and workers house complex in black bins to bin collection.  Disposal by contractor																		

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			Sewage (septic tank at workers housing complex & office)	Monitoring of housing complex cleanliness	
				To monitor during housing inspection/from residents' complaint	
				To engagement with licensed contractor for sewage maintenance	
		Industrial Waste	Scrap Metal	To barricade the areas of scrap iron	
				To arrange for disposal by contractor	
		Scheduled Waste	Used lubricant Used hydraulic oil Clinical waste Empty chemical container Contaminated rags, glove, and other PPE	SW stored at designated SW stored	
				To maintain inventory for storage as SW (manual and E-Swiss)	
				Disposal of SW by contractors licensed by DOE	
				To maintain copy of license of SW contractors	
				Disposal of clinical waste by VMO clinic. Contract agreement with VMO, inventory to be maintain	
		Recycleable Waste	Empty Pesticide Container	To store recyclable waste in locked store	

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Criterion / Indicator		Assessment Findings			Compliance
				To dispose empty pesticide containers through license contractor registered with Jabatan Pertanian	
			Fertilizer bags	To display labelling at the reuse container	
<b>4.5.3.3</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>The SOP on Scheduled Waste disposal is established and implemented. Details as provided in Waste Management Procedure For Upstream Malaysia 2022. Doc ID : SD/SDP/GSD/HSE/0522/01. During site visit at schedule waste store, it was found the following compliance:</p> <ul style="list-style-type: none"> <li>Scheduled wastes are stored at the designated area which is far away from area of employee's activities.</li> <li>Details of scheduled waste disposed to registered contractor, Pexxxx Fxxxx (Mxxxxx) Sdn Bhd as table above:</li> <li>Adequate signage has been put up clearly such as danger, and scheduled waste store.</li> <li>The scheduled waste store is cover with roofed.</li> <li>Floor of store are covered with concrete.</li> <li>Sticker labelling of scheduled waste generated are according to the Regulation 10 of Scheduled Waste Regulations 2005.</li> </ul>			Complied

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Criterion / Indicator		Assessment Findings				Compliance
		Estate	Date	SW	Consignment No.	
		Diamond Jubilee	27/12/2023	SW 305	20231227095VBYPD	
				SW 306	20231227090QR14X	
				SW 410	202312270958QGWE	
		Welch Estate	07/06/2024, 04/06/2024	SW 404	2024060709PG8ACV	
				SW 410	202406041164BVSU	
				SW 409	2024060412X&WRBP	
4.5.3.4	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. <b>- Major compliance -</b>	The estate declared empty pesticide containers as non-schedule wastes after it was triple rinsed and puncture according to the letter issue by Jabatan Alam Sekitar, dated 20/11/2003, which was sighted in the Waste Management Procedure For Upstream Malaysia 2022. Doc ID: SD/SDP/GSD/HSE/0522/01. Disposal of empty pesticide containers was done by license contractor (Sx Sxxxx Txxxxxxx Enterprise) registered to Department of Agriculture. Sighted the payment voucher (No. 2601) dated 22/02/2024 for the disposal is available as per audit. Empty pesticide containers that have not been yet disposed by the contractors will be store in the empty pesticide container store. Empty pesticide containers that were re-used for spraying activity were marked with skull symbol. Sighted the triple rinsing record is available as per audit				Complied
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. <b>- Minor compliance -</b>	The disposal of domestic waste was guided by procedures entitled SDP - Waste Management Procedures for Upstream Malaysia ref SD/SDP/GSD/HSE/0522/01 dated May 2022. The management of domestic waste was concluded in table below:				Complied
		Estate	Contractor		Disposal Site	
		Diamond Jubilee Estate	Rxxxxxxx Sxxxx Sdn Bhd		GxxxxVxxx Sxxxxxxx Sdn Bhd	

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Criterion / Indicator		Assessment Findings			Compliance
			Majlis Perbandaran Jasin	Majlis Perbandaran Jasin dumpsite	
		Welch Estate	Majlis Perbandaran Segamat	Majlis Perbandaran Segamat dumpsite	
<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 all polluting activities has been conducted by the estates, including greenhouse gas emissions and scheduled wastes. Pollutant activities has been identified in the environment aspect impact analysis which is available and documented in the Environmental Management Plan Year 2024. In addition, assessment of the pollution activities also was conducted in the following documents: <ul style="list-style-type: none"> <li>• Energy Management Plan</li> <li>• Environmental Risk Management</li> <li>• Pollution Prevention Plan</li> <li>• Waste Management Action Plan</li> </ul> All the above has outlined the sources of pollutions, category of pollution and mitigation plan.			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>	An action plan to reduce identified significant pollutants and emission has been established and available during the audit for verification. This has been verified in the document entitled Pollution Prevention Management Plan. Among example of implementation of the action plan documented are:			Complied

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Criterion / Indicator		Assessment Findings	Compliance									
		<ul style="list-style-type: none"><li>To maintain oi trap as to prevent oil spillage and to provide proper spilled kit</li><li>To ensure all schedule waste is stored and disposed as per legal requirement</li><li>Preventive maintenance of farm vehicle</li><li>To clean and maintain the parking area free from oil residue</li><li>Spill tray for farm vehicle (tractor)</li><li>Sump/oil trap at workshop and premix area</li><li>To erect “No Open Burning” signage</li><li>Weekly housing inspection</li></ul>										
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</p>	<p>Estate management had established its Water Management Plan for the Financial 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.</p> <p>a. The assessment of water usage was available, indicating that the water source for domestic and operational use is from Sxxxxxxx Axx Mxxxxx Bxxxxx (SAMB). Additionally, rainwater harvesting is utilized for cleaning and watering purposes. Water usage, as recorded below, is tabulated in meter cubic per metric ton of Fresh Fruit Bunches (m3/FFB mt):</p> <table><tr><td>Month</td><td>Diamond Jubilee Estate</td><td>Welch Estate</td></tr><tr><td>Oct '23</td><td>1.02</td><td>10.29</td></tr><tr><td>Nov '23</td><td>1.51</td><td>2.05</td></tr></table>	Month	Diamond Jubilee Estate	Welch Estate	Oct '23	1.02	10.29	Nov '23	1.51	2.05	Complied
Month	Diamond Jubilee Estate	Welch Estate										
Oct '23	1.02	10.29										
Nov '23	1.51	2.05										

Criterion / Indicator		Assessment Findings			Compliance
	or before planting or replanting, along all natural waterways within the estate.	Dec '23	1.71	12.03	
	e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.  f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.  <b>- Major compliance -</b>	Jan '24	1.75	7.70	
		Feb '24	2.27	8.51	
		Mar '24	2.09	7.24	
		Apr '24	1.74	4.85	
		May '24	1.84	4.79	
		June '24	1.65	9.86	
		b. It was confirmed that there is no natural waterway for Diamond Jubilee Estate and Welch Estate within or along the boundary of the estate compound as per verification via site visit and documentation review.			
		c. As confirmed during site visit, estates utilize water recycling practices. Water from the sump at the premix area is reused for chemical mixing, while rainwater is recycled for washing tractors and machinery. These measures are implemented to optimize water and nutrient usage, thereby reducing wastage.			
		d. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The estate consistently adheres to the practice of avoiding chemical activities near the identified buffer zone along the water catchment area at Diamond Jubilee Estate. This was confirmed through interviews with sampled workers conducted during the audit.			
e. There were no issues on removal natural vegetation in riparian areas as verified during the field visit. If any issues occurred, investigation will be conducted as per River Reserve Management					



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Criterion / Indicator		Assessment Findings	Compliance
		(Management of River Reserve in Sime Darby Plantation dated April 2014). f. No bore well is being use for water supply. The water source for domestic and operational use is from Sxxxxxxx Axx Mxxxxx Bxxxxx (SAMB).	
<b>4.5.5.2</b>	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. <b>- Minor compliance -</b>	No construction of bunds/ weirs and dams has been identified. This has been clarified by the estate personnel during the assessment and verified during the field visit.	Complied
<b>4.5.5.3</b>	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). <b>- Minor compliance -</b>	Water harvesting practices such as silt pits, roadside drains and good ground cover has been implemented and well maintained by the estate management. This has been verified during site visit. It was also verified as a part of the common practices introduced within the SDP Group Agriculture Procedures.	Complied
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>			
<b>4.5.6.1</b>	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: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. 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.	Group Sustainability Department of SD Guthrie (formally known as Sime Darby Plantation Berhad) has conducted the High Conservation Value (HCV) assessment for SOU 18 Version 2.0, April 2017 (Diamond Jubilee Estate) and HCV Assessment Report, Version 2.0, August 2016 (Welch Estate). This report delineates the biodiversity value, ecosystem services, and social & cultural values within landscape of SOU 18. The report covers the following: - Overview of HCV Assessment (Objectives, scope of the assessment, assessment team and methodology and participatory) - Description of assessment area	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p><b>- Major compliance -</b></p>	<ul style="list-style-type: none"> <li>- Landscape context of SOU 18 (Biodiversity and conservation values, ecosystem service and social &amp; cultural values)</li> <li>- HCV criteria &amp; application to agriculture (Visual observation and supporting information, wildlife in plantation and decision on HCV status)</li> <li>- Recommendation (HCV management and monitoring)</li> <li>- Appendices (HCV maps and attendance records)</li> </ul> <p>References used for the establishment of the report, among others are as follows:</p> <ul style="list-style-type: none"> <li>- High Conservation Value Forest (HCVF) Toolkit for Malaysia; National guide for identifying, managing and monitoring High Conservation Value Forest, published by WWF Malaysia.</li> <li>- Managing Biodiversity in the Landscape; Guideline for Planners, Decision Makers &amp; Practitioner, published by Wild Asia (Malaysia)</li> <li>- A practical toolkit for identifying and monitoring biodiversity in oil palm landscape; published by Zoological Society of London</li> <li>- HCV Threat Monitoring Protocol; HCV monitoring protocol for oil palm landscape, published by Zoological Society of London</li> <li>- Common Guidance for the Identification of High Conservation Value; published by HCV Resource Network</li> <li>- Common Guidance for the Management &amp; Monitoring of High Conservation Value; published by HCV Resource Network</li> </ul> <p>The map showing the coverage area in performing the HCV assessment is available in the report, which covering all estates under SOU 18. Type of HCV identified for each estates are given in Table 1 under Executive Summary for the report as below:</p>	

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Criterion / Indicator		Assessment Findings				Compliance												
		<table><tr><td>Estate</td><td>HCV Area</td><td>Hectare</td><td>HCV Type</td></tr><tr><td>Diamond Jubilee Estate</td><td>Water Catchment</td><td>5.58</td><td>HCV 4</td></tr><tr><td>Welch Estate</td><td>Water Catchment (water body 6)</td><td>0.95</td><td>HCV 4</td></tr></table>	Estate	HCV Area	Hectare	HCV Type	Diamond Jubilee Estate	Water Catchment	5.58	HCV 4	Welch Estate	Water Catchment (water body 6)	0.95	HCV 4	<p>Besides the above, the conservation status of the identified flora and fauna species are provided in the report, there is no RTE at all estates except for reported presence of Birds, mammals, reptiles, insect (least concern and vulnerable). The management and monitoring plan for HCV areas was established and reviewed annually. There were displays of signage made during site visit at area of HCV.</p> <p>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 estates had been identified and being monitored</p>			
Estate	HCV Area	Hectare	HCV Type															
Diamond Jubilee Estate	Water Catchment	5.58	HCV 4															
Welch Estate	Water Catchment (water body 6)	0.95	HCV 4															
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a. Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b. Discouraging any illegal or inappropriate hunting, fishing, or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p>	<p>According to HCV Assessment Report, Version 2.0, April 2017 (Diamond Jubilee Estate) and HCV Assessment Report, Version 2.0, August 2016 (Welch Estate), there is no RTE at all estates except for reported presence of Birds, mammals, reptiles, insect (least concern and vulnerable). The management and monitoring plan for HCV areas was established and reviewed annually. There were displays of signage made during site visit at area of HCV.</p> <ul style="list-style-type: none"><li>No fishing, no manuring / no spraying</li></ul>				Complied												

Criterion / Indicator		Assessment Findings	Compliance																				
	- Major compliance -	<ul style="list-style-type: none"> <li>No spraying/ no hunting / no swimming</li> </ul> <p>The estates had established an HCV action plan for FY2024 such as:</p> <ul style="list-style-type: none"> <li>Ensuring all legal requirements to the protection of species/habitat are met.</li> <li>Controlling any illegal /inappropriate hunting, fishing, and developing measures to resolve human-wildlife conflicts.</li> </ul> <p>Protection of buffers zones for water catchment as identified in the HCV assessment. Communications are made to all employees, contractors, suppliers, and neighbour informing that encroachment and hunting are not allowed.</p>																					
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>All estates have established HCV Management Plan base on the HCV identified in the report. Reviewed and sighted the implementation of the management plan as follows:</p> <p><u>Diamond Jubilee Estate</u></p> <table border="1"> <thead> <tr> <th>Objective</th><th>Category</th><th>Types</th><th>Action</th></tr> </thead> <tbody> <tr> <td>Protection of erosion prone area</td><td>Erosion prone area</td><td>Field</td><td>Roadside pit</td></tr> <tr> <td></td><td>Maintenance of erosion area</td><td></td><td>Road patching by crusher run</td></tr> <tr> <td></td><td></td><td></td><td>Natural vegetation</td></tr> <tr> <td>Management of human wildlife conflict</td><td>HCV assessment report</td><td>Water catchment and other field area</td><td>To train workers on RTE species internally or</td></tr> </tbody> </table>	Objective	Category	Types	Action	Protection of erosion prone area	Erosion prone area	Field	Roadside pit		Maintenance of erosion area		Road patching by crusher run				Natural vegetation	Management of human wildlife conflict	HCV assessment report	Water catchment and other field area	To train workers on RTE species internally or	Complied
Objective	Category	Types	Action																				
Protection of erosion prone area	Erosion prone area	Field	Roadside pit																				
	Maintenance of erosion area		Road patching by crusher run																				
			Natural vegetation																				
Management of human wildlife conflict	HCV assessment report	Water catchment and other field area	To train workers on RTE species internally or																				

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Criterion / Indicator		Assessment Findings				Compliance
					engagement with Department of Wildlife, GSQM or related agencies	
					Recording Of wildlife sighted in HCV Monitoring	
		Enhancement of HCV areas/biodiversity in the estate			To erect signage of HCV  To ensure no encroaching or trespassing  To observe no sign of soil erosion  No chemical application near water stream	
		Welch Estate				
		Objectives	Category	Types	Action	

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		Management of human wildlife conflict	Promotion of RTE	Water catchment and other field area (P02C)	To train/brief workers on HCV and RTE species	
					Recording the wildlife sighted in the HCV monitoring record	
		Enhancement of HCV areas/biodiversity in the estate	HCV assessment report		To do monitoring of HCV	
					To ensure signage of HCV display	
					To ensure no encroachment or trespassing	
					No chemical application near HCV Area	
		The buffer zone was demarcated with red and white colour ring at the palm trunks. No evidence of chemical application sighted at the area. Signage on prohibition to conducts activities such as swimming, fishing and chemical applications has been installed at the each identified buffer zone area. Noted during interview with the sample of workers, the understanding on prohibition of activities in the buffer zone area if satisfactory.				
Criterion 4.5.7: Zero burning practices						

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Criterion / Indicator		Assessment Findings	Compliance
<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 (formerly known as Sime Darby Plantation Berhad) has established a Group Sustainability & Quality Policy Statement as part of the company's commitment towards implementation of zero burning practices. This policy is guided by commitments spelt out in the company's Responsible Agriculture Charter (RAC). Under section 3.2.5 of documents entitled Responsible Agriculture Charter (RAC) stated that 'zero use of fire for land preparation and establish effective monitoring and prevention as well as proactive firefighting measures within a reasonable radius beyond our operational boundaries.  Based on records review during the audit, the palm trunks will be felled and shredded to ensure implementation of zero burning practice during land preparation for replanting	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> -	Not applicable as no special application is made for areas where risk of disease spread as to date.	N/A
<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> -	Not applicable as no application for controlled burning is made as to date.	N/A
<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> -	Replanting activity for Diamond Jubilee Estate will be take place on the year 2025. Latest replanting for Welch Estate was conducted 2024. The method of the replanting is felled, chipped and shredded as mentioned in the company's Responsible Agriculture Charter (RAC). This has been verified during site visit at field R01B1.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<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> -	Standard Operating Procedures (SOPs) for the estates are developed and available. Generally, Sime Darby Plantation has formulated Agricultural reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) for operation guidance to all their estates. Among critical SOP for as listed below: <ul style="list-style-type: none"> <li>• Health, Safety &amp; Environment Management System (HSEMS) Manual, Doc No. UM/HSE/MS/01, Edition 2021</li> <li>• Safe Harvesting Procedure, Doc. No. UM/HSE/OCP/02, Edition 2021</li> <li>• Personal Protective Equipment (PPE), Doc. No. UM/HSE/OCP/03, Edition 2021</li> <li>• Chemical Safety Management, Doc. No. UM/HSE/OCP/04, Edition 2021</li> <li>• Permit To Work (PTW), Doc. No. UM/HSE/OCP/05, Edition 2021</li> <li>• OSH Risk Management Procedure, UM/HSE/SP/01, Edition 2021</li> <li>• Incidents, Accidents and Non-Compliance Management Procedures, Doc. No. UM/HSE/SP/03, Edition 2022</li> <li>• Managing Occupational Safety and Health (Noise Exposure) Regulation 2019 Compliance, Doc. No. UM/HSE/SP/06</li> </ul>	Complied
<b>4.6.1.2</b>	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	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established Group Sustainability & Quality Policy Statement followed by commitment under SDP Responsible Agriculture Charter (RAC) Rev.:02 on year 2020. The revise charter describes company	Complied



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	contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. - <b>Major compliance</b> -	commitment as sighted in section 3.1 of Protect and conserve biodiversity and ecosystems. Which in subsection 3.1.2, SDPB enhanced on their commitment on managing of erosion by protecting of steep slopes and river reserves within their own operations and promoting restoration programs.  Observations and site visit indicated that implementation to minimize and control soil erosion was conducted effectively. These measures included proper stacking of fronds, application of Empty Fruit Bunches (EFB), avoiding blanket spraying, constructing terraces, maintaining roads, and preserving soft vegetation in interlines. Additionally, cover crops were planted both in replanted areas and mature sections of the estates. Management also introduced legume cover crops as a cover crop along certain slopes.	
<b>4.6.1.3</b>	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 division and blocks. Each block is named by visual identification (field marker) erected for reference. Observed during site visit, field number (2013A) are marked on the palm and signboards.	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. - <b>Major compliance</b> -	Diamond Jubilee Estate and Welch Estate has established five (5) years business plan as the guideline for estate operations. Review on the business plan containing the activity costing for estate labor overhead, oil palm mature upkeep, admin costs, total oil palm mature cost, and oil palm new planting total cost. In addition, the budgets included projections on yield/Ha, and total cost of production per MT & per Ha. Sighted that Diamond Jubilee and Welch Estate management updated	Complied

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		their expenditure (Actual and Budget) in the Oil Palm Expenditure For May 2024 and Oil Palm Yield Statistics (Actual & Budget) For May 2024.	
<b>4.6.2.2</b>	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>	(formerly known as Sime Darby Plantation Berhad) established Group Sustainability & Quality Policy Statement followed by commitment under SDP Responsible Agriculture Charter (RAC) Rev.:02 on year 2020. The revise charter describes company commitment as sighted in section 3.1 of Protect and conserve biodiversity and ecosystems. Which in subsection 3.1.2, SDPB enhanced on their commitment on managing of erosion by protecting of steep slopes and river reserves within their own operations and promoting restoration programs. Observations and site visit confirmed that Diamond Jubilee Estate will start the replanting program on 2025. Verified that replanting program has been established until 2029 (For DJ Estate). Replanting program for Welch Estate is available in the MPLAN 2025 New Planting and Replanting 2024 – 2029. Verify during site visit that new planting has already started and replanting will take place on 2025	Complied
<b>4.6.2.3</b>	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 e) Financial indicators: cost benefit, discounted cash flow, return on investment <b>- Major compliance -</b>	Diamond Jubilee Estate and Welch Estate has established five (5) years business plan as the guideline for estate operations. Review on the business plan containing the activity costing for estate labor overhead, oil palm mature upkeep, admin costs, total oil palm mature cost, and oil palm new planting total cost. In addition, the budgets included projections on yield/Ha, and total cost of production per MT & per Ha. Sighted that Diamond Jubilee and Welch Estate management updated their expenditure (Actual and Budget) in the Oil Palm Expenditure for May 2024 and Oil Palm Yield Statistics (Actual & Budget) For May 2024.	Complied

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<b>4.6.2.4</b>	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>	The management plan was effectively implemented, and the achievement of the goals and objectives were regularly monitored, documented, and reviewed through Monthly Progress Reports, Monthly Accounts Reports, Annual Financial Reports, Agronomist Visit Reports and Internal Audit Report. All the report had been reviewed during the audit for verification. Any variation if significant from the budgeted amount is justified with reasons in the Monthly progress Report and Monthly Accounts Reports.	Complied
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	<u>Diamond Jubilee Estate</u> Sighted and verified supplemental Agreement between Sime Darby Plantation Berhad and Rxxxxxxx Sxxxxx Sdn Bhd (rubbish collection transporter) with validity until 31/12/2024. Appendix 1 showed the Schedule of Transport Rates (Transport Rates). Both parties have signed the agreement accordingly. <u>Welch Estate</u> Sighted and verified Letter of Extension Of FFB Transporter between SD Guthrie Berhad and Kxx Sxxx Lxx Txxxxxxx Sdn Bhd, with validity until 31/12/2024. Appendix 1 showed the Schedule of Transport Rates (Transport Rates). Both parties have signed the agreement accordingly.	Complied
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	SD Guthrie Berhad implemented a pricing mechanism in accordance with the contract agreements with contractors. Upon reviewing the contract agreement, the pricing for job tasks was identified, and payment terms for contract work were clearly outlined.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		During stakeholder interview session, there is no concern regarding payment were raised by contractors.	
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	The contractor also has signed contract agreement and Sime Darby Plantation Group's Vendor Code of Business Conduct (Vendor COBC), Vendor Integrity Pledge and declaration on compliance of ISCC/RSPO/MSPO requirements: 1. Ponxxx Entxxxxxxxxx 2. Srx Yogxxxxxxxxx Kaxx Entxxxxxxxxx 3. Rajaxxxxxx Sexxx Sdn Bhd	Complied
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established pricing mechanism and conducted as per contract agreement with contractors. Review on the contract agreement, sighted pricing of the job task is available at West Estate for the FFB transporting, EFB munching. 1. Ponxxx Entxxxxxxxxx 2. Srx Yogxxxxxxxxx Kaxx Entxxxxxxxxx 3. Rajaxxxxxx Sexxx Sdn Bhd	Complied
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. <b>- Minor compliance -</b>	Contractors have signed on the letter for the compliance of RSPO/ ISCC/ MSPO/ SCCS requirements in accordance with SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) HQ Estate Quality Management System which mentioned the contractor shall provide access to the RSPO/ ISCC/ MSPO/ SCCS auditors to contractors' operation site(s) and employees whenever deemed necessary and evident as follows:	Complied

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		1. Ponxxx Entxxxxxxxxx 2. Srx Yogxxxxxxxxx Kaxx Entxxxxxxxxx 3. Rajaxxxxxx Sexxx Sdn Bhd	
<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>	Stated also the Letter of Award (LOA), stated that the Service Provider acknowledges and agrees that the Service Fee will only be paid by the company upon satisfactory completion of the services by the service provider in accordance with the terms and conditions. Review on the contract agreement, sighted pricing of the job task is available. Sampled contract/Letter of Award to contractors as follows for Diamond Jubilee Estate and Welch Estate: 1. Ponxxx Entxxxxxxxxx 2. Srx Yogxxxxxxxxx Kaxx Entxxxxxxxxx 3. Rajaxxxxxx Sexxx Sdn Bhd	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>	Not applicable in the estate.	N/A
<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	Not applicable in the estate.	N/A

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	requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - <b>Major compliance</b> -		
<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. - <b>Major compliance</b> -	Not applicable in the estate.	N/A
<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. - <b>Major compliance</b> -	Not applicable in the estate.	N/A
<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. - <b>Major compliance</b> -	Not applicable in the estate.	N/A
<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. - <b>Major compliance</b> -	Not applicable in the estate.	N/A

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<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. <b>- Minor compliance -</b>	Not applicable in the estate.	N/A
<b>Criterion 4.7.4:</b> Soil and topographic information			
<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. <b>- Major compliance -</b>	Not applicable in the estate.	N/A
<b>4.7.4.2</b>	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. <b>- Major compliance -</b>	Not applicable in the estate.	N/A
<b>Criterion 4.7.5:</b> Planting on steep terrain, marginal and fragile soils			
<b>4.7.5.1</b>	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. <b>- Major compliance -</b>	Not applicable in the estate.	N/A
<b>4.7.5.2</b>	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.	Not applicable in the estate.	N/A

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	- Major compliance -		
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	Not applicable in the estate.	N/A
<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. - Major compliance -	Not applicable in the estate.	N/A
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	Not applicable in the estate.	N/A
4.7.6.3	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. - Major compliance -	Not applicable in the estate.	N/A
4.7.6.4	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.	Not applicable in the estate.	N/A



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	- Major compliance -		
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	Not applicable in the estate.	N/A
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	Not applicable in the estate.	N/A
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	Not applicable in the estate.	N/A
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	Not applicable in the estate.	N/A

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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> -	<p>The established policy underscores SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad)'s steadfast commitment to a multifaceted approach, aiming to:</p> <ol style="list-style-type: none"> <li>1. Foster Good Governance and Transparency.</li> <li>2. Contribute to the betterment of society.</li> <li>3. Minimize environmental impact.</li> <li>4. Deliver sustainable quality.</li> </ol> <p>These principles are guided by the overarching commitments articulated in the company's:</p> <ol style="list-style-type: none"> <li>1. Responsible Agriculture Charter (RAC),</li> <li>2. Human Rights Charter (HRC),</li> <li>3. Innovation &amp; Productivity Charter (IPC).</li> </ol> <p>These charters serve as foundational pillars, providing a comprehensive framework for aligning actions with the company's</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		values and ensuring a holistic commitment to responsible and sustainable practices in agriculture, human rights, innovation, and productivity.	
<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>	An internal audit for RSPO (Roundtable on Sustainable Palm Oil) and MSPO (Malaysian Sustainable Palm Oil) was conducted for SOU 18 Diamond Jubilee POM on 04/04/2024 by the Group Sustainability Department (GSD). The audit procedures adhered to the reference standards outlined in MS 2530.  During the audit, a total of 8 major non-conformities. The subsequent Internal Audit Report provided a comprehensive overview, including the identification of root causes for the non-conformities and OFIs.  It is noteworthy that all identified non-conformities and OFIs were diligently addressed and closed, in alignment with the corrective actions outlined in the Internal Audit Report. This proactive approach underscores the commitment to maintaining and enhancing compliance with RSPO and MSPO standards in the Diamond Jubilee POM.	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>	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established an Internal Audit Standard Operating Procedure entitled Internal Audit Procedure dated April 2024.  The Internal Audit Plan was submitted to the mill management from the Group Sustainability Department on 12/03/2024.  According to this procedure, internal audits are scheduled to be conducted at least once a year.	Complied

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		<p>In the latest audit, a total of 8 major non-conformities, Subsequent to a thorough examination detailed in the Internal Audit Report, root causes for the non-conformities.</p> <p>It is noteworthy that all identified non-conformities were duly addressed and closed in accordance with the corrective actions outlined in the Internal Audit Report, ensuring the continuous improvement of the internal audit process.</p>	
<b>4.1.2.3</b>	<p>Reports shall be made available to the management for their review.</p> <p><b>- Major compliance -</b></p>	<p>The internal audit report has distributed to the mill's management. The Management Representative has acknowledged on the acceptance of the Internal Audit Report on 04/04/2024 at Diamond Jubilee Palm Oil Mill. Management review meeting was conducted to review the findings of the internal audit.</p>	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established a guidelines for Management Review documented in Management Review Guidelines dated March 2024. Based on the guidelines established, the frequency for management review needs to be carried out at least once a year. The latest management review meeting was carried out on 05/04/2024 at Diamond Jubilee POM with 24 attendees where the agenda that discussed as below:</p> <ol style="list-style-type: none"> <li>1. Introduction</li> <li>2. Matters arising</li> <li>3. Changes in regulation, standards, policies &amp; procedures in relation</li> <li>4. Review on operation input and output</li> </ol>	Complied

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		5. Review on management plan 6. Result from system audit and assessment 7. Stakeholder feedback 8. Resources for system implementation 9. Continual Improvement Plan 10. Conclusion & meeting output	
Criterion 4.1.4 – Continual Improvement			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. <b>- Major compliance -</b>	The Continuous Improvement Plan was established and categorized. Sample is taken as the following: 1. Process – To replace raw water pipe from catchment pond to mill. 2. Safety – To fabricate station bench work at sludge oil recovery system. 3. Environment – to conduct campaign on managing the domestic waste at workers housing complex. 4. Social – to repair broken drainage workers housing complex.	Complied
<b>4.1.4.2</b>	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. <b>- Major compliance -</b>	Upon the confirmation of any new projects. Employees receive comprehensive briefings on new developments, fostering a foundational understanding, during the weekly briefings. The management team, in turn, is kept abreast of such developments through dedicated discussions during the monthly management meetings.  Moreover, the dissemination of pertinent information is facilitated by the Regional Chief Executive Officer (RCEO) and Regional	Complied

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		<p>General Manager (RGM) during the monthly Managers meetings and through official email channels.</p> <p>In a commitment to ongoing enhancement, the management consistently engages in the rigorous review of estate performance and work methodologies. This persistent evaluation is geared towards fostering continual improvement, with the aim of achieving superior results.</p>	
<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>	<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 (SDPB)) has implemented a Communication Procedure for both Internal and External Stakeholders. This information is presented in both English and Malay languages and is made accessible to stakeholders through notice boards at the mill. The dissemination of information is carried out to both internal and external parties through Townhall Session or External Stakeholders' Meeting. Latest external stakeholder meeting conducted was on 21/06/2024.</p>	Complied
<b>4.2.1.2</b>	<p>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>It was noted that management documents related to sustainability available at mill during the on-site audit upon request including sustainability policies, procedures, social and environmental assessments as well as management action plans etc. Furthermore, global documents accessible via company's website.</p> <p>On the other hand, confidential documents such as financial and personal records, must not be disclosed publicly. Mill Manager holds the responsibility for managing all communication and requests for</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		documentation that may be made available to the public or stakeholders	
<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> -	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 to estate's performance.  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 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.	Complied
<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> -	The Mill Manager has officially appointed Nur Iman Sodja binti Zulkarnain-Assistant Manager, appointed on 01/06/2024.  These appointed individual will serve as the Person in Charge (PIC) for social issues, which includes actively in investigating any social social issue, to keep the complain record, to give counseling to workers, and give training regarding social compliance.	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	A documented list of stakeholders for the year 2024 has been observed. This list was subsequently updated on 01/06/2024.	Complied

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	shall be properly maintained. - <b>Major compliance</b> -	Notably, the most recent meeting with stakeholders transpired on 21/06/2024, underscoring the ongoing engagement and communication with relevant parties.	
<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> -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has implemented standard operating procedures (SOP) to ensure traceability, as detailed in the document titled "Sime Darby Plantation, Sustainable Supply Chain and Traceability for Upstream Malaysia", Doc. No.: SDP/GSD/202401/SCCS updated and approved in January 2024 by Rashyid Redza Anwarudin, Chief Sustainability Officer. The changes have been made for Section 8, Section 9.2 and 10.8 Appendix 2.  This procedure aims to guide mills in establishing and effectively implementing sustainable supply chain practices and traceability measures for certified sustainable materials (FFB).  The Standard Operating Procedures also outline the Critical Control Points (CCPs), which include situations where there's a risk of mixing certified and non-certified FFB, along with measures for controlling the flow and transportation of FFB from estates to mill.	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. - <b>Major compliance</b> -	SOU 18 Diamond Jubilee management maintain the current practice with conduct inspection on the compliance of the traceability system on daily basis. Onsite interview with weighbridge operator informed they key in all the related data into the system and verified by the executive at the end of the day. Review on the weighbridge records and FFB delivery notes, sighted incoming and outgoing document been signed by operators and executives.	Complied



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4.2.3.3	The management shall identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	The mill has appointed Assistant Engineer, Ms. Nur Ixxx Soxxx binti Zulkarnain on 13/03/2024 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 on Supply Chain Certification System</li> <li>Maintenance of relevant records, to ensure records is controlled as per procedure</li> <li>Monitoring of the mass balance incoming and outgoing, sustainable, and non-sustainable material</li> <li>Other related issues on SCCS</li> </ul>	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>	The management has established the Standard Operating Procedure for Sustainable Supply Chain and Traceability for Upstream Malaysia, Doc. No.: SDP/GSD/202401/SCCS updated and approved in January 2024 by Rashyid Redza Anwarudin, Chief Sustainability Officer. The changes have been made for Section 8, Section 9.2 and 10.8 Appendix 2. Stated in the procedure under Control of Documents and Records, all records for the implementation and maintenance of sustainable supply chain systems shall be identified and kept up to-dated such as weighbridge tickets, consignment notes, training records, contract, etc.  Review on the records, sighted mill management maintain the CPO and PK sold delivery records with evidence as follows:	Complied

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		CPO Buyer Customer: 500-002750 - Sxxx Despatch Ticket: 012139 Date: 29/06/2024 Nett Weight: 40,800 kg P.O No: 1859 Contract No.: S/PSD/2406/CPO0011C	PK Buyer Customer: SDX CAXXX ISXXXX KCX Despatch Ticket: 012071 Date: 24/05/2024 Nett Weight: 31,240 kg P.O No: 068671 Contract No.: S/PSD/2403/PK0032	
<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 shall be in compliance with applicable local, state, national and ratified international laws and regulations. <b>- Major compliance -</b>	Diamond Jubilee POM continue to comply with the legal requirements. Among the evidence of legal compliance as follows 1) Weighbridge calibration; DE18011014 conducted on 08/08/2024. 2) Chargemen competency reference ST(MLK)P/S/MLK/00832: 08/08/024; 21/05/2024. 3) Water abstraction permit; BKSAM01712 expired on 30/04/2025. 4) Environment compliance schedule: 30/06/2025. 5) MPOB licenses; 500288804000 expired on 30/09/2024.		Complied
<b>4.3.1.2</b>	The management shall list all relevant laws related to their operations in a legal requirements register. <b>- Major compliance -</b>	All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Refer to Legal Register with addition to applicable laws since last assessment as follows: 1. Whistleblower Protection Act 2010		Complied

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		2. Minimum Wages Order 2022, Amendment 2022 3. Fire Services Act 1988 (Act 341) Amendment 2020 4. "Pembangunan Sumber Manusia Berhad" Act 2000 5. Anti-Sexual Harassment Act 2021 6. Employees' Social Security (Amendment) Act 2022 7. Employment Insurance System (EIS) (Amendment) Act 2022 8. Control of Supplies Act 1961 9. Employment (Amendment) Act 2022 10. Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit 2021	
<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 procedure has 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. A mechanism to ensure compliance to legal and other requirement has been documented in MQMS (Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 18. Group Sustainability Department (GSD) 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.	Complied
<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>	Group Sustainability Department will update the operating regarding any changes on applicable laws to the operating units. The person responsible appointed at the operating units will update the changes in the Legal Register.	Complied

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		The Asst. Manager, Nur Ixxx Soxxx binti Zulkarnain has been appointed as person responsible to monitor any changes to the LORR and update, when necessary, as per appointment letter dated 01/09/2022 signed by the Mill Manager.	
<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> -	Diamond Jubilee POM located within Diamond Jubilee 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 the land use rights of other users. No issues of land dispute issue occurred in the mill that involved other land user rights.	Complied
<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> -	Diamond Jubilee POM located within Diamond Jubilee 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.  Diamond Jubilee Estate Verified that the management maintained the current total of 32 land titles. Based on the review. One copy of land titles is applicable to Diamond Jubilee POM available with land title no.: 20xxx.	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> -	Diamond Jubilee POM located within Diamond Jubilee 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	Complied

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		monsoon drain and fencing. The housing and other recreational facilities are located within the same vicinity for ease of employees' management.	
<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 Diamond Jubilee POM. SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has the legal ownership documents as demonstrated by possessing land titles.	N/A
<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> -	There was no land dispute at Diamond Jubilee POM. SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has the legal ownership documents as demonstrated by possessing land titles.	N/A
<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> -	There was no land dispute at Diamond Jubilee POM. SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has the legal ownership documents as demonstrated by possessing land titles.	N/A
<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> -	There was no land dispute at Diamond Jubilee POM. SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has the legal ownership documents as demonstrated by possessing land titles.	N/A
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			

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<b>Criterion 4.4.1:</b> Social Impact Assessment (SIA)			
<b>4.4.1.1</b>	<p>Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.</p> <p><b>- Minor compliance -</b></p>	<p>The management has conducted a Social Impact Assessment (SIA) for SOU 18 which include the Diamond Jubilee 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.</p> <p>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 30/06/2024. This strategic plan takes into careful consideration the diverse perspectives and concerns from different stakeholders, including workers, surrounding 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.</p>	Complied
<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>The company has developed a documented procedure in Sustainable Plantation Management System on handling social issues, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008. The procedure has detailed the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.</p>	Complied

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		<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 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill. Timeframe for external communication to provide feedback within two weeks of 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 has conducted the grievance channel training through the ILO training on 20/02/2024.</p>	
<b>4.4.2.2</b>	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.</p> <p><b>- Major compliance -</b></p>	<p>Consultation and communication were conducted through written reports and meetings. Any communication/request/grievances from external stakeholder were recorded in the communication logbook or complaints form for stakeholders.</p> <p>For internal stakeholders, main grievances recorded were regarding housing repair. Sighted the Housing Repair form with latest report dated 03/07/2024. All complaints have been satisfactorily addressed by the mill.</p>	Complied
<b>4.4.2.3</b>	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p> <p><b>- Minor compliance -</b></p>	<p>The mill has established communication book/form for internal and external complaint. The communication logbook/forms is available at mill office.</p> <p>In case the complainant would want to make an anonymity complaint it can be made through electronic Complaint form or email to Senior Director or Whistleblowing committee or toll-free number or fax or by mail. Oil Palm Pal was use by the workers to lodge complaint regarding the house digitally, and the progress of each report are monitored.</p>	Complied

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4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - <b>Minor compliance</b> -	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 during stakeholder meeting. "Workers Helpline System was the latest method for workers to make any complaint and grievances, Awareness training has been conducted 20/02/2024	Complied
4.4.2.5	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: Commitment to contribute to local sustainable development</b>			
4.4.3.1	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. Bubur Lambuk give away during the Ramadhan. Dated 26-27/03/2024 2. Job opportunities to local communities.	Complied
<b>Criterion 4.4.4: Employees safety and health</b>			
4.4.4.1	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> -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 05/05/2022. The estates have established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2024. The management plan includes the ESH Risk Management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring.	Minor Non Compliance



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		<p>Sighted the noise risk assessment conducted on 04/02/2020 by Ms Nxx Ixxxxx Sxxxxx NRA registration number HQ/16/PEB/00/158 report reference number HQ/LPROYKPEB/20/00078 for all operations. As per assessment, sighted recommendation by assessor to continue with current practices which the management has supplied 3M-1270 Earplug NRR24 and to established agreement for using earplugs for all workers and executive before enter the production plant. HIRARC for sterilizers updated on 24/01/2024 mentioned potential risk; noise place exposure between 86dB- 115dB and action plan to wear earplug with NRR up to 24dB. Verified PPE matrix which sterilizer station has been classified as Others; mentioned that earplug is one of the PPE required.</p> <p>The PPE usage has not been effectively monitored and effectively communicate to the worker. During site visit, sighted that one of the POM personnel are not wearing earplug while inspecting the sterilizer area during the process.</p>	
<b>4.4.4.2</b>	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risk of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> <li>3.7 All employees involved are adequately trained on safe working practices;</li> </ul> </li> </ul>	<p>The occupational safety and health plan cover the following:</p> <ul style="list-style-type: none"> <li>a) SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) have established the Group Policy on Health, Safety &amp; Environment (HSE) Policy Statement signed by the CEO on 05/05/2022. The policy has been communicated to the staffs and workers through induction training for new workers, morning briefing and displayed at various notice boards within the estate. The policy has been briefed to all workers during the muster call on 02/02/2024 and 20/03/2024.</li> <li>b) SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) have established Standard Operating Procedure for</li> </ul>	Complied

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<p>3.8 All precautions attached to products should 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 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>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>OSH Risk Assessment – UM/HSE/SP/01 dated 09/03/2021. Diamond Jubilee POM have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations. Among the activities verified in the HIRARC included the processing activities (Press Station, Kernel Plant, Oil Room) and maintenance activities (Workshop)</p> <p>c) HIRARC is reviewed on annually and as and when there are any accidents that occur in the estate. Verified the latest review of HIRARC dated 25/01/2024.</p> <p>Chemical hazard risk assessment (CHRA) has been conducted on 08/07/2020 by Nxxxxx Cxxxxxxxxx DOSH reference HQ/15/ASS/00/363-2020-107.</p> <p>Addendum of CHRA done on 14/12/2022 by Lxxxxx Rxxxxxxxxx, Ms. Rxxxxxxxx bxxxx Axxxx for Biocatalyst application CHRA report number HQ/11/ASS/00/296-2022/46.</p> <p>Noise risk assessment conducted on 04/02/2020 by Ms Nxx Ixxxxx Sxxxxx NRA registration number HQ/16/PEB/00/158 report reference number HQ/LPROYKPEB/20/00078 for all operations.</p> <p>Addendum Noise risk assessment (NRA) conducted on 23/04/2024 by Ms. Nxx Ixxxxx Sxxxxx NRA registration No. HQ/16/PEB/00/158</p> <p>Audiometric test has been conducted on which identified 10 persons which need medical examination by OHD including bone conduction within 30 days from the report and 7 workers required retest within 3 months. Medical examination with bone</p>	

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<p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>conduction conducted on 19/03/2024 and retest conducted on 01/02/2024 done by Pxxxxxx Exxxxxxxxx (M) Sdn Bhd.</p> <p>Medical surveillance conducted on 15/02/2024 and 05/03/2024 and identified workers required for medical removal protection and retest conducted on 15/05/2024. P Jxxxxxxxx A/L recommend to refer to chest specialist and Txxx Txxxxx Mxxxxx Cxxxxx on 02/03/2024 and has been referred to Hxxxxxxxx Jxxxx on 06/03/2024</p> <p>d) Diamond Jubilee POM have established a training program for employees exposed to chemicals used at the palm oil estates to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager, and representative from the chemical suppliers to the supervisors and operators. Sighted the Training records as follows</p> <p>Chemical Handling Training: 31/05/2023</p> <p>LOTO Training: 23/05/2023</p> <p>PPE Training: 31/05/2024</p> <p>e) The mill have provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC and PPE matrix.</p> <p>Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>f) Standard Operating Procedures for Handling of Chemicals were available in several documents such as:</p> <p>Sime Darby Plantation Berhad, Chemical Safety Management</p>	

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	<p>Procedure; Document No.UM/HSE/OCP/04 dated 09/03/2021.  Appointment letter sighted as OSH chairman to Mr. Zxxxxx bxx  Axxxxxxx dated 15/03/2024 signed by Mr Txxx Mxxx Kxxx with  8 employer representative and 8 employee representative.</p> <p>g) The management 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 OSH Meeting Minutes dated as  follows:  OSH meeting conducted on 02/02/2024 and 02/05/2024.</p> <p>h) Accident and Emergency procedures were available in the ESH  Management System Manual; Emergency Preparedness &amp;  Response Procedures; Doc No: UM/HSE/SP/02 Date  17/11/2021. The mill has established Emergency Response  Team lead by the mill Managers. The ERT chart and Fire  Extinguisher Map was also available and verified.  Emergency Response Training was conducted as below:  <u>Diamond Jubilee POM</u>  ERT Team Fire Handling Competency Training with BOMBA –  21/03/2023</p> <p>i) First aiders were assigned to various workstation at the estates.  The mandores and staffs were responsible for first aid boxes at  each workstation assigned to them by the management. The  first aid box was recently replenished with all stated items  available in the box. First Aid trainings were conducted regularly</p>	

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		<p>at the mill. The management has conducted the internal training for the workers. Sighted the First Aid training were conducted on 26/06/2024. The accident occurred was reviewed on quarterly basis during OSH committee meeting.</p> <p>j) <u>Diamond Jubilee POM</u></p> <p>There were 6 accidents case for the year 2023 with working hours lost reported in the POM with total 13 days. The JKPP 8 form has been submitted to DOSH for the year ending 2023 on 11/01/2024 (Ref No: JKPP8/154277/2023) and documents available for verification.</p>	
<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</p>	Complied

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		<p>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 20/02/2024. These initiatives reflect the company's commitment to effective communication, addressing social issues, and ensuring a responsive and accountable approach to stakeholder concerns.</p> <p>The management has conducted the policy briefing on 18/03/2024.</p>	
<b>4.4.5.2</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>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. The policy has been briefed to all the employees and stakeholders.</p>	Complied
<b>4.4.5.3</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2022. Sampled of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker.</p>	Complied

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		Sampled of eight workers agreement and pay slips for May 2024, November 2023 and August 2023 are verified.	
<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 used the contractor for the CPO shipment from the mill to the refinery. Verified that the CPO contract the Mekxx Angxxx Sdn Bhd. The contractor has submitted the employment contract, salary slip, EPF and SOCSO statement.</p> <p>Sample taken on the employment contract found that there is a discrepancy between the leave offered regarding the paternity leave. Verification in the employment contract from Mexxx Angxxx Sdn Bhd dated 03/02/2024 in Clause C – Cuti Keperian (iii) Dapat Anak – (Pekerja Lelaki Sahaja) which is stated two days compared to seven days stipulated in the Employment Act.</p> <p>In the same contract agreement, it is mentioned on the pre employment medical check-up payment is bared by the employees without reimbursement from the employers. This is not inline with the Vendor COBC (5.7) which stated that the vendor's employees are not charged with recruitment fees for the purpose of restricting free movement. Thus, Minor Non-Conformity is raised.</p>	Minor Non Compliance
<b>4.4.5.5</b>	<p>The management shall establish records that provide an accurate overview 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>	The mill management has registered all their workers into Employee Master Details Listing in SEMUA system where personal details such as full name, gender, date of birth, date join company, race, designation, and wages were recorded.	Complied
<b>4.4.5.6</b>	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment	The mill management has employed local and foreign workers from Indonesia and Bangladesh. They are all under direct employment to the mill. All of them have signed on the employment contract	Complied

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	contract shall be made available for each and every employee indicated in the employment records. - <b>Major compliance</b> -	prior to work and extension contract where the original contract has expired. Terms and conditions were according to Collective Agreement and Employment Act 1955.	
<b>4.4.5.7</b>	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 the 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
<b>4.4.5.8</b>	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - <b>Major compliance</b> -	All the 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 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).	Complied
<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	The management has contributed 10kg of rice once every 2 months for all their workers. Apart from that, all the workers are provided	Complied



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	work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - <b>Minor compliance</b> -	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.	
<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. The mill workers are using Syarikat Air Melaka Berhad (SAMB) water. Linesite inspection was carried out on weekly basis by Mill Supervisor using Housing Complex/ Nest/ Community Hall Inspections.	Complied
<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 Diamond Jubilee POM on 18/03/2024.	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	Union meeting conducted on 03/04/2023 together with the working hour training conducted by the Labor Office Melaka. The meeting and training was conducted at Diamond Jubilee Estate Hall. The minute of meeting is sighted, together with the attendance list. For 2024, the meeting will be conducted in July 2024.	Complied

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	negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. <b>- Major compliance -</b>	Latest Social Dialogue was conducted 28/05/2024 – verification of the issues were tracked in Social Dialogue Tracking System.													
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. <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.	Complied												
Criterion 4.4.6: Training and competency															
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. <b>- Major compliance -</b>	<div>Diamond Jubilee POM have established a training program for all workers based on the training need analysis conducted on a yearly basis. Records of trainings were maintained by the estates as below: - <u>Diamond Jubilee POM</u></div> <table><tr><th>Training</th><th>Date</th></tr><tr><td>Hearing Conservation, Human Right Charter, Human Right Defender, and HIRARC Training</td><td>22/03/2024</td></tr><tr><td>Contractor Safety Training -</td><td>20/02/2024</td></tr><tr><td>SCCS, MSPO and RSPO Training</td><td>24/02/2023</td></tr><tr><td>Sexual Harassment Briefing</td><td>26/03/2023</td></tr><tr><td>PPE Training</td><td>31/05/2024</td></tr></table>	Training	Date	Hearing Conservation, Human Right Charter, Human Right Defender, and HIRARC Training	22/03/2024	Contractor Safety Training -	20/02/2024	SCCS, MSPO and RSPO Training	24/02/2023	Sexual Harassment Briefing	26/03/2023	PPE Training	31/05/2024	Complied
Training	Date														
Hearing Conservation, Human Right Charter, Human Right Defender, and HIRARC Training	22/03/2024														
Contractor Safety Training -	20/02/2024														
SCCS, MSPO and RSPO Training	24/02/2023														
Sexual Harassment Briefing	26/03/2023														
PPE Training	31/05/2024														
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.	Diamond Jubilee POM have conducted training need analysis for all employees, management and contractors. The training need analysis was conducted based on the job designation and training required by the job type which is incorporated in the training plan	Complied												

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	- <b>Major compliance</b> -	for Diamond Jubilee POM 2024. Sample of training plan is as the following: 1. Schedule Waste Management 2. PPE Training 3. Hearing Conservation Training 4. HCV Training 5. Fire Drill Training 6. COBC Training 7. Sexual Harassment Briefing 8. Payslip Training 9. OSH Committee Function & Responsibility + Workplace Inspection Training	
<b>4.4.6.3</b>	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.  - <b>Minor compliance</b> -	A training programme has been developed and available in the Annual Training Programme 2024. The trainings were sighted to have been sub categorised to trainings on Environmental, SOP, Social and OSH.	Complied
<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>	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.  - <b>Major compliance</b> -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established the Group Health, Safety & Environment (HSE) Policy that was signed by the Group Managing Director on 05/05/2022. SD Guthrie Berhad is committed to the well-being of its employees, providing safe and healthy working environment,	Complied

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		<p>pre-emptively preventing its employees and external parties in an environmentally responsible manner at global operating sites. The company is also committed to:</p> <ul style="list-style-type: none"> <li>Continually improving the management of occupational safety, health-related and environment matters</li> <li>Eliminating or minimizing any potential adverse effect on the environment arising from our business activity</li> <li>Value the importance of river and ecosystem functions</li> <li>Educate and encourage stakeholders in maintaining and enhancing the quality of the health, safety and environment</li> </ul> <p>The Environmental Management Plan review confirms objectives, action steps, completion dates, and tracking mechanisms in place. Additionally, an Environmental Impact Assessment has been conducted at the mill to assess and mitigate any adverse impacts.</p>	
<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>All operating unit in SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) adopted with environment policy as mentioned in indicator 4.5.1.1. Mill management has established the Environment Management Plan dated 30/06/2024. The environment management plan has covered the following:</p> <p>a) Energy Management Plan</p> <p>b) Pollution Prevention Plan</p> <p>c) Waste Management Plan</p> <p>d) EAI, EIE</p> <p>The environment aspect impact analysis has been established for all operation under documents entitled Environmental Impact</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance						
		Evaluation Form. Latest revision for EIA was on 29/05/2024 with regards to updated for operation of weighbridge activity. Sighted and verified among activities covered in the EIE and EIA are operation of weighbridge, maintenance of weighbridge and EFB yard,							
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.  - Major compliance -	<p>The developed environmental improvement plan to mitigate the negative impacts and to promote the positive ones were effectively implemented and monitored.</p> <p>Environmental Management Plan dated 30/06/2024 having details of mitigation of the negative impacts. Example as per below:</p> <table><tr><th>Environmental Objectives</th><th>Actions</th></tr><tr><td>To maintain the effectiveness of EAI/EIE</td><td>To review EAI/EIE for any changes in operation</td></tr><tr><td>Proper disposal of waste in accordance to SOP and legal requirement</td><td>Domestic waste collection by tractor and dumped in trash bin before disposed by the contractor  Used cooking oil collection program  Ensure good working condition of SW store (locked, no chemical spill, signage is available)</td></tr></table> <p>Site visit conducted on samples of mill activity, found that environmental management plan related to the process were implemented and mitigate the negative impacts in mill.</p>	Environmental Objectives	Actions	To maintain the effectiveness of EAI/EIE	To review EAI/EIE for any changes in operation	Proper disposal of waste in accordance to SOP and legal requirement	Domestic waste collection by tractor and dumped in trash bin before disposed by the contractor  Used cooking oil collection program  Ensure good working condition of SW store (locked, no chemical spill, signage is available)	Complied
Environmental Objectives	Actions								
To maintain the effectiveness of EAI/EIE	To review EAI/EIE for any changes in operation								
Proper disposal of waste in accordance to SOP and legal requirement	Domestic waste collection by tractor and dumped in trash bin before disposed by the contractor  Used cooking oil collection program  Ensure good working condition of SW store (locked, no chemical spill, signage is available)								

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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>	Programmed to promote the positive impact has been included in the continual improvement plan as evident in document entitled Environmental Management Plan dated 30/06/2024. Objectives, category, types/location, action, frequency and person in charge were included in the plan for monitoring the progress. Among the plan to promote positive impact as follows: <ul style="list-style-type: none"><li>• Recycle scrap metal or sell to potential buyer</li><li>• To maintain locked and good working of schedule waste store</li><li>• Used cooking oil collection program (as and when necessary)</li></ul>	Complied												
4.5.1.5	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. <b>- Major compliance -</b>	Diamond Jubilee POM consistently conducts training sessions for workers to raise awareness about environmental issues. This ensures that employees understand the company's policies and work towards achieving environmental objectives. <table><tr><td>No</td><td>Description</td><td>Date</td></tr><tr><td>1.</td><td>Briefing of RSPO/MSPO and HCV Awareness</td><td>03/04/2024</td></tr><tr><td>2.</td><td>In house EAI, EIE &amp; High Conservation Value Training</td><td>30/05/2024</td></tr><tr><td>3.</td><td>Safety chemical handling training</td><td>25/05/2024 &amp; 31/05/2024</td></tr></table>	No	Description	Date	1.	Briefing of RSPO/MSPO and HCV Awareness	03/04/2024	2.	In house EAI, EIE & High Conservation Value Training	30/05/2024	3.	Safety chemical handling training	25/05/2024 & 31/05/2024	Complied
No	Description	Date													
1.	Briefing of RSPO/MSPO and HCV Awareness	03/04/2024													
2.	In house EAI, EIE & High Conservation Value Training	30/05/2024													
3.	Safety chemical handling training	25/05/2024 & 31/05/2024													
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. <b>- Major compliance -</b>	Diamond Jubilee POM consistently conduct meeting regards to environment to discuss all environment concerns via Environment Performance Monitoring Committee (EPMC). Verified latest meeting conducted was on 25/06/2024 who attended by 9 staffs and workers. Among issues discussed during the meeting but not limited to:	Complied												

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		<ul style="list-style-type: none"><li>Environmental Impact Assessment &amp; EIE</li><li>Inspection from government body (DOE, DOSH &amp; MPOB)</li><li>Legal and Other Requirement Register (LORR)</li><li>Schedule Wastes and open burning</li><li>Industrial Wastes</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>Diamond Jubilee POM has implemented a monitoring system to track non-renewable energy usage for the year 2024, and these records are reported monthly to the head office using the SAP system. The usage recorded as table below:</p> <table><tr><td>Month</td><td>Diesel/FFB ratio</td><td>Electric/FFB ratio</td></tr><tr><td>January</td><td>0.17</td><td>11.70</td></tr><tr><td>February</td><td>0.11</td><td>14.43</td></tr><tr><td>March</td><td>0.12</td><td>13.84</td></tr><tr><td>April</td><td>0.08</td><td>11.45</td></tr><tr><td>May</td><td>0.13</td><td>10.68</td></tr></table> <p>Diamond Jubilee POM has formulated energy management plan to enhance the efficiency of non-renewable energy usage and establish a baseline consumption level. Verify the diesel baseline average is 0.12 and electric baseline average is 12.19. Plan to assess usage of diesel is available in Energy Management Plan dated 30/06/2024. Example of plan are as follow:</p> <table><tr><td>Category</td><td>Types/Location</td><td>Action</td><td>Frequency</td></tr><tr><td>Electricity</td><td>Worker’s housing, office area</td><td>Worker’s housing inspection to ensure no illegal wiring</td><td>Weekly</td></tr></table>	Month	Diesel/FFB ratio	Electric/FFB ratio	January	0.17	11.70	February	0.11	14.43	March	0.12	13.84	April	0.08	11.45	May	0.13	10.68	Category	Types/Location	Action	Frequency	Electricity	Worker’s housing, office area	Worker’s housing inspection to ensure no illegal wiring	Weekly	Complied
Month	Diesel/FFB ratio	Electric/FFB ratio																											
January	0.17	11.70																											
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		Diesel	Transport machineries	Preventive maintenance programme for estate vehicle	Daily									
4.5.2.2	Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. <b>- Major compliance -</b>	Diamond Jubilee POM has formulated energy management plan to enhance the efficiency of non-renewable energy usage and establish a baseline consumption level. Based on the plan, mill confirmed the estimation of direct non-renewable energy usage for operational activities, encompassing fossil fuels, electricity, transportation, and machinery. This estimation also covers the usage of fossil fuels and electricity by contractors.				Complied								
4.5.2.3	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	The fibre and shell are used in the boiler for fuel recycled in the process system. EFB is used in the estates for mulching.				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. <b>- Major compliance -</b>	All waste and pollution are identified and documented in the Waste Management Plan, dated 30/06/2024. Inside the plan, the mill also maintained records of source identification and type of scheduled waste. The waste generated from the mill operations are as follows: <table><tr><td>Waste</td><td>Item</td><td>Action</td><td>Frequency</td></tr><tr><td>Scheduled Waste</td><td>Used lubricants &amp; hydraulic oil Used empty chemical</td><td>To ensure good working condition of SW store (locked, no</td><td>Weekly</td></tr></table>				Waste	Item	Action	Frequency	Scheduled Waste	Used lubricants & hydraulic oil Used empty chemical	To ensure good working condition of SW store (locked, no	Weekly	Complied
Waste	Item	Action	Frequency											
Scheduled Waste	Used lubricants & hydraulic oil Used empty chemical	To ensure good working condition of SW store (locked, no	Weekly											



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			container, spent chemical from lab, contaminated rags, contaminated PPE, Discarded/off spec paints or other waste from maintenance activities	chemical spill, signage) Identification of SW items: SW305- spent lubricant oil SW306- spent hydraulic oil SW322- spent hexane SW409- empty chemical containers (from lab, chemical store and painting), used contaminated PPE SW410- used rags (used rags,	As and when necessary	

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Criterion / Indicator		Assessment Findings				Compliance
				contaminated cotton gloves		
				SW418-discarded or off specification solvent based paints		
		Industrial waste	Scrap metal	Recycle scrap metal or sell to potential buyer	As and when necessary	
		Operational waste/by product	EFB	Monitor EFB production and disposal	Daily	
		Air pollution	Boiler operation	CEMS Conduct boiler stack monitoring	Daily Annually	
		Industrial wastewater	POME	Land application as fertiliser	As and when necessary	
<b>4.5.3.2</b>	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution.	All waste and pollution are identified and documented in the Waste Management Plan, dated 30/06/2024. Inside the plan, the mill also maintained records of source identification and type of scheduled waste. The waste generated from the mill operations are as follows:				Complied
		Waste	Item	Action	Frequency	

Criterion / Indicator		Assessment Findings				Compliance
	b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. <b>- Major compliance -</b>	Scheduled Waste	Used lubricants & hydraulic oil Used empty chemical container, spent chemical from lab, contaminated rags, contaminated PPE, Discarded/off spec paints or other waste from maintenance activities	To ensure good working condition of SW store (locked, no chemical spill, signage)	Weekly	
				Identification of SW items: SW305- spent lubricant oil  SW306- spent hydraulic oil  SW322- spent hexane  SW409- empty chemical containers (from lab, chemical store and painting), used contaminated PPE	As and when necessary	

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Criterion / Indicator		Assessment Findings				Compliance
				SW410- used rags (used rags, contaminated cotton gloves		
				SW418- discarded or off specification solvent based paints		
		Industrial waste	Scrap metal	Recycle scrap metal or sell to potential buyer	As and when necessary	
		Operational waste/by product	EFB	Monitor EFB production and disposal	Daily	
		Air pollution	Boiler operation	CEMS Conduct boiler stack monitoring	Daily Annually	
		Industrial wastewater	POME	Land application as fertiliser	As and when necessary	
		Verify during site inspection, segregation of wastes such as general waste and schedule waste was in satisfactory practice. Proper				

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		<p>storage areas were available for the schedule wastes, general waste and recyclable wastes at the mill. Records on the usage and disposal were well maintained by the management.</p> <p>Also, one of the sources of mill pollution generated from the mill is the smoke emission from the boiler. It is monitored from the Stack Emission Monitoring during the entire operations. Sighted the sample report of Stack Emission Monitoring for Boiler No.1, which was conducted on 18/01/2023 by Third-Party Assessor (Sxxxxxxx Lxxxxxxxxx (Jxxxxx) Sdn Bhd) is available as per audit. The assessment was conducted to determine the concentration of the air pollutants emitted from the boiler's stack to the atmosphere as per Environmental Quality (Clean Air) Regulation 2014. These reports are reviewed by the mill and submitted to DOE as per stated in the Jadual Pematuhan Syarat – Syarat Lesen No. 21 (i) and (ii).</p> <p>Based on the report, the emission level of all parameters tested for Boiler No. 1 is in compliance with their respective limits under Environmental Quality (Clean Air) Regulation 2014 except for Carbon Monoxide (CO). The result is such as follow:</p> <table> <tr> <th>Description</th><th>Unit</th><th>Boiler No. 2</th><th>Limits</th></tr> <tr> <td>Particulate Matter (Dust)</td><td>Mg/m3, dry, @ 12% CO2</td><td>28.12</td><td>150</td></tr> <tr> <td>Carbon Monoxide (CO)</td><td>Mg/m3, dry, @ 12% CO2</td><td>710</td><td>1000</td></tr> </table>	Description	Unit	Boiler No. 2	Limits	Particulate Matter (Dust)	Mg/m3, dry, @ 12% CO2	28.12	150	Carbon Monoxide (CO)	Mg/m3, dry, @ 12% CO2	710	1000	
Description	Unit	Boiler No. 2	Limits												
Particulate Matter (Dust)	Mg/m3, dry, @ 12% CO2	28.12	150												
Carbon Monoxide (CO)	Mg/m3, dry, @ 12% CO2	710	1000												

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Criterion / Indicator		Assessment Findings	Compliance
		Verify the stack emission for the year 2024 supposedly conducted on the month of February but postpone due to mill shutdown and was conducted on 30/05/2024 (for boiler No. 2) and 27/06/2024 (for boiler No. 1). Result of the analysis has yet issue by the Third-Party Assessor (Pxxxxxx Exxxxxxxxxxxxx Sdn Bhd). Evidence of the assessment such as photos is available as per audit.	
<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>Standard Operating Procedure (SOP) for Scheduled Waste disposal is established and implemented. Details as provided in Waste Management Procedure for Upstream 2022 (ref: SD/SDP/GSD/HSE/0522/01 and SDP Plantation Sustainability and Quality Management (PSQM) Scheduled Waste (Hazardous Waste) Management ref no. SD/SDP/PSQM (ESH)/203- EN1, dated 06/01/2015. The SOP established with objective to ensure proper and safe handling, storage, and disposal of scheduled waste.</p> <p>The mill management has taken actions such as training provided to workshop personnel on schedule waste awareness, all schedule waste generated in the workshop been collected and placed in SW store as verified during site visit and interview with the Storekeeper. Verification during site visit has confirmed that schedule waste is labelling according to 3<sup>rd</sup> Schedule of Environmental Quality (Scheduled Waste) Regulation 2005. This has been verified during site visit by the audit team. The labelling of schedule waste consists of the following information required in the 3<sup>rd</sup> Schedule of Environmental Quality (Scheduled Waste) Regulation 2005:</p> <ul style="list-style-type: none"> <li>• Date of waste generate</li> <li>• Name of waste generator</li> </ul>	OFI

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		<ul style="list-style-type: none"><li>• Address of waste generator</li><li>• Telephone number of waste generator</li><li>• Schedule waste code and warning signage of the schedule waste</li></ul> <p>In addition, the audit team found that inventory of schedule waste from January 2024 to June 2024 is made available for verification during the audit. Inventory of schedule waste was reported online in E-SWISS system which is developed by DOE and submitted by the mill on monthly basis. Schedule waste consists of SW305, SW306, SW322, SW409, SW410 and SW 418 were disposed to the approved contractor by DOE, Pxxxxx Fxxxx (Mxxxxx) Sdn Bhd. Latest disposal was on 29/01/2024 as per reviewed consignment notes and details of scheduled waste disposed as table below:</p> <table><tr><th>Type of Scheduled Waste</th><th>Quantity (mt)</th></tr><tr><td>SW 322</td><td>0.0667</td></tr><tr><td>SW 110</td><td>0.0030</td></tr><tr><td>SW 409</td><td>0.2730</td></tr><tr><td>SW 410</td><td>0.5955</td></tr><tr><td>SW 418</td><td>0.0775</td></tr></table> <p>From the objectives evidence captured during the audit, it was found that the mill practices are according to the procedure established and in line with Environment Quality Regulations (Scheduled Waste) 2005.</p> <p>The mill management may improve on the awareness regarding the schedule waste category on the contaminated used PPE as per documentation in the Environmental Management Plan - OFI</p>	Type of Scheduled Waste	Quantity (mt)	SW 322	0.0667	SW 110	0.0030	SW 409	0.2730	SW 410	0.5955	SW 418	0.0775	
Type of Scheduled Waste	Quantity (mt)														
SW 322	0.0667														
SW 110	0.0030														
SW 409	0.2730														
SW 410	0.5955														
SW 418	0.0775														
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.	Domestic waste generated from workers quarters and mill complex were collected by appointed contractor, Uxx Rxxxxxxxxx Sdn Bhd	Complied												

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	- Minor compliance -	and disposed by Gxxxxxxx Sxxxxxxx Sdn Bhd. Frequency of collection domestic waste is 3 times per week. The disposal of domestic waste was guided by procedures entitled SDP - Waste Management Procedures for Upstream Malaysia ref SD/SDP/GSD/HSE/0522/01 dated May 2022. The risk of contamination has been minimized through this system.												
<b>Criterion 4.5.4:</b> Reduction of pollution and emission including greenhouse gas														
<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. - Major compliance -	<p>All waste and pollution are identified and documented in the Waste Management Plan, dated 30/06/2024. Inside the plan, the mill also maintained records of source identification and type of scheduled waste. The waste generated from the mill operations are as follows:</p> <table border="1"> <thead> <tr> <th>Waste</th><th>Item</th><th>Action</th><th>Frequency</th></tr> </thead> <tbody> <tr> <td rowspan="2">Scheduled Waste</td><td>Used lubricants &amp; hydraulic oil</td><td>To ensure good working condition of SW store (locked, no chemical spill, signage)</td><td>Weekly</td></tr> <tr> <td>Used empty chemical container, spent chemical from lab, contaminated rags, contaminated PPE, Discarded/off spec paints or other waste</td><td>Identification of SW items: SW305- spent lubricant oil  SW306- spent hydraulic oil</td><td>As and when necessary</td></tr> </tbody> </table>	Waste	Item	Action	Frequency	Scheduled Waste	Used lubricants & hydraulic oil	To ensure good working condition of SW store (locked, no chemical spill, signage)	Weekly	Used empty chemical container, spent chemical from lab, contaminated rags, contaminated PPE, Discarded/off spec paints or other waste	Identification of SW items: SW305- spent lubricant oil  SW306- spent hydraulic oil	As and when necessary	Complied
Waste	Item	Action	Frequency											
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Criterion / Indicator		Assessment Findings				Compliance
			from maintenance activities	SW322- spent hexane  SW409- empty chemical containers (from lab, chemical store and painting), used contaminated PPE  SW410- used rags (used rags, contaminated cotton gloves  SW418- discarded or off specification solvent based paints		
		Industrial waste	Scrap metal	Recycle scrap metal or sell	As and when necessary	

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				to potential buyer		
		Operational waste/by product	EFB	Monitor EFB production and disposal	Daily	
		Air pollution	Boiler operation	CEMS Conduct boiler stack monitoring	Daily Annually	
		Industrial wastewater	POME	Land application as fertiliser	As and when necessary	
		<p>The mill management has also waste management plan, pollution prevention plan and greenhouse gas (GHG) reduction plan, which was available and documented in the document of Environmental Management Plan Diamond Jubilee POM 2024, prepared on 30/06/2024. Among others action been taken by the mill are as follows:</p> <ul style="list-style-type: none"> <li>• Scheduled wastes – disposed to Pxxxxxx Fxxxx Sdn Bhd within 180 days</li> <li>• Full compliance to zero burning practice</li> <li>• Monitoring of BOD level at final discharge pond</li> <li>• Conduct boiler stack monitoring</li> </ul> <p>The mill also equipped with a Continuous Emission Monitoring System (CEMS). During the audit, it was verified that the condition of the CEMS was found to be in functional condition. Data from the stack is connected online to DOE's office. Boiler smoke emission</p>				

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		<p>data are within the DOE limit</p> <p>Also, one of the sources of mill pollution generated from the mill is the smoke emission from the boiler. It is monitored from the Stack Emission Monitoring during the entire operations. Sighted the sample report of Stack Emission Monitoring for Boiler No.1, which was conducted on 18/01/2023 by Third-Party Assessor (Sxxxxxxx Lxxxxxxxxx (Jxxxxx) Sdn Bhd) is available as per audit. The assessment was conducted to determine the concentration of the air pollutants emitted from the boiler's stack to the atmosphere as per Environmental Quality (Clean Air) Regulation 2014. These reports are reviewed by the mill and submitted to DOE as per stated in the Jadual Pematuhan Syarat – Syarat Lesen No. 21 (i) and (ii).</p> <p>Based on the report, the emission level of all parameters tested for Boiler No. 1 is in compliance with their respective limits under Environmental Quality (Clean Air) Regulation 2014 except for Carbon Monoxide (CO). The result is such as follow:</p> <table border="1"> <thead> <tr> <th>Description</th><th>Unit</th><th>Boiler No. 2</th><th>Limits</th></tr> </thead> <tbody> <tr> <td>Particulate Matter (Dust)</td><td>Mg/m3, dry, @ 12% CO2</td><td>28.12</td><td>150</td></tr> <tr> <td>Carbon Monoxide (CO)</td><td>Mg/m3, dry, @ 12% CO2</td><td>710</td><td>1000</td></tr> </tbody> </table> <p>Verify the stack emission for the year 2024 supposedly conducted on the month of February but postpone and was conducted on 30/05/2024 (for boiler No. 2) and 27/06/2024 (for boiler No. 1).</p>	Description	Unit	Boiler No. 2	Limits	Particulate Matter (Dust)	Mg/m3, dry, @ 12% CO2	28.12	150	Carbon Monoxide (CO)	Mg/m3, dry, @ 12% CO2	710	1000	
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		<p>Result of the analysis has yet issue by the Third-Party Assessor (Pxxxxxx Exxxxxxxxxxx Sdn Bhd).</p> <p>The Bund and Freeboard was monitored every month by Assistant Engineer. The samples of monitoring date 02/07/2024 and 25/06/2024 for Raw, Acid Digester 1,2,3, anaerobic 1,2,3, holding, Sedimentation 1 &amp; 2 – 0.5 – 1.5m</p>	
<b>4.5.4.2</b>	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p><b>- Major compliance -</b></p>	<p>Action plan to reduce identified significant pollutants and emission is available in the waste management plan, pollution prevention plan and greenhouse gas (GHG) reduction plan, which was available and documented in of Environmental Management Plan Diamond Jubilee POM 2024, prepared on 30/06/2024.</p> <p>In addition, site inspection to the workers areas as well as production compound confirms that scheduled waste is managed according to the plan. it was verified that the condition of the CEMS was found to be in functional condition and stack emission monitoring was conducted accordingly (refer 4.5.4.1).</p> <p>The mill management has also appointed Third Party Environment Audit as per requirement in the DOE License which covers all operation in the mill. The third-party audit was conducted on 14/06/2024, audited by Lead Auditor (reg. no: EA0114). The audit report is documented and available as per audit with nil compliance, two (2) Observation and six (6) good management practices sighted.</p>	Complied
<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>Diamond Jubilee POM continually treated palm oil mill effluent (POME). This is to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations of 1977.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																		
	- Major compliance -	<div>1. Premises License 006085 is valid from 01/07/2024 to 30/06/2025. The license indicated that the mill has a capacity of 30 mt/hr.</div> <div>2. Analysis of the final effluent discharge was carried out monthly. A review of the results indicated that all parameters were within the regulatory limit.</div> <div>3. POME land application approval by DOE under items 3 of the permitted license</div> <div>All parameters for the effluent final discharge were within the regulatory limit, such as BOD discharged to land application, which was not more than 5000 mg/l. The lab report for final discharge was carried out by accredited laboratories (SD Guthrie Research Sdn Bhd). The result was within the limit, sample for the 20/06/2024 as per the results as follows:</div> <table><tr><th>Parameter</th><th>Result</th><th>Standard Quality</th></tr><tr><td>pH</td><td>7.65</td><td>5.0 – 9.0</td></tr><tr><td>*BOD (mg/L)</td><td>1550</td><td>5000</td></tr><tr><td>Suspended solids (mg/L)</td><td>13650</td><td>1200</td></tr><tr><td>AN (mg/L)</td><td>252</td><td>25</td></tr><tr><td>Oil and Grease</td><td>12</td><td>150</td></tr></table> <div>Due to the POME land application, only the BOD limitation result has been monitored. The quarterly report on final discharge, effluent discharge, water consumption, and production data was sent to DOE accordingly through the Online Environmental Reporting, and the first quarters (sample) report was sent on 02/04/2024 (01/01/2024 – 31/03/2024)</div>	Parameter	Result	Standard Quality	pH	7.65	5.0 – 9.0	*BOD (mg/L)	1550	5000	Suspended solids (mg/L)	13650	1200	AN (mg/L)	252	25	Oil and Grease	12	150	
Parameter	Result	Standard Quality																			
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Criterion / Indicator		Assessment Findings	Compliance																												
		Diamond Jubilee POM has appointed Mr. Sxxx Mxxxxxxx Fxxxxx Bxx Sxxx Mxxxxxx (assistant manager) as a competent person for effluent management. He has attended training on scheduled waste effluent treatment (CePPOME) and obtained a certificate of competency reference series number (CePPOME/2321098)																													
<b>Criterion 4.5.5: Natural water resources</b>																															
<b>4.5.5.1</b>	<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> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>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.).</li> </ul> <p><b>- Major compliance -</b></p>	<p>Sighted and reviewed water management plan established and updated on 30/06/2024. It was found that Diamond Jubilee POM gets its water for processing from a water catchment. Monitoring record for water consumption per FFB processes as table below:</p> <ul style="list-style-type: none"> <li>a) The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made monthly with the recording detailed (water usage m<sup>3</sup>/per mt of fresh fruit bunches (FFB) 2024 as below:</li> </ul> <table border="1"> <thead> <tr> <th>Month</th><th>FFB (mt)</th><th>Water (L)</th><th>Ratio</th></tr> </thead> <tbody> <tr> <td colspan="4">2024</td></tr> <tr> <td>Jan</td><td>7534.48</td><td>12250</td><td>1.63</td></tr> <tr> <td>Feb</td><td>5281.31</td><td>9533</td><td>1.81</td></tr> <tr> <td>Mar</td><td>6478.26</td><td>10641</td><td>1.64</td></tr> <tr> <td>Apr</td><td>7432.03</td><td>11471</td><td>1.54</td></tr> <tr> <td>May</td><td>8900.85</td><td>13285</td><td>1.49</td></tr> </tbody> </table> <ul style="list-style-type: none"> <li>b) Water sampling analysis at Sungai Chabau was conducted once a month. Sample taken for the month of June dated 14/06/2024, test report number: IE968/2024. Result of the water sampling is such as follow:</li> </ul>	Month	FFB (mt)	Water (L)	Ratio	2024				Jan	7534.48	12250	1.63	Feb	5281.31	9533	1.81	Mar	6478.26	10641	1.64	Apr	7432.03	11471	1.54	May	8900.85	13285	1.49	Complied
Month	FFB (mt)	Water (L)	Ratio																												
2024																															
Jan	7534.48	12250	1.63																												
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Mar	6478.26	10641	1.64																												
Apr	7432.03	11471	1.54																												
May	8900.85	13285	1.49																												

Criterion / Indicator		Assessment Findings								Compliance
		Sample ref	pH	BOD (mg/L)	COD (mg/L)	SS (mg/L)	AN (mg/L)	DO (mg/L)	P (mg/L)	
		Upstream	7.56	1	16	8	<1	3.79	0.048	
		Midstream	7.34	1	12	4	<1	3.62	0.069	
		Downstream	7.24	<1	8	16	<1	3.91	0.018	
		Based on the test report, issuance date: 01/07/2024, sighted that the DO result is off limit. Arrangement for re-sampling and analysis of the concern will be done concurrently and sent to the laboratory within 1 week of receiving the results. This is inline with the Standard Operating Procedure (SOP) for Water Quality Monitoring, Appendix 7, Issue No: 2, Issue Date: 01/06/2016								
		c) Ways to optimize water and nutrient usage and reduce wastage are described in the mill 'Water Management Plan', dated 30/06/2024. The POM will conduct monitor the usage of treated water for mill operation and also contingency plan during water shortage. The implementation has been verified in the document 'Water Consumption FY2024'.								
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.  - Major compliance -	POME was discharged through land application. All parameters were within the regulatory limits. The BOD final discharge was no more than 5000 mg/l. The lab report for final discharge was carried out by the accredited laboratories on a monthly basis. Refer to item 4.5.4.3 for the result, which was sighted within the limit. During the site visit, no evidence of effluent overflow was observed, and daily flow meter readings were taken and recorded in the log book.								Complied
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>Diamond Jubilee POM implemented Standard Operating Procedure (SOP) as per outlined in the Sustainable Plantation Management System (SPMS) ver. 1 dated 1/11/2008 and the Mill Quality Management System ver. 1 dated 1/11/2008. Both documents include the mill's Standard Operating Procedures (SOPs) and Mill Quality Management Manual v.1 2008/MQMS/QMM/08, providing guidelines and standards for mill operations.</p> <p>The SOPs cover all operation stations including reception, sterilization, threshing, pressing, clarification, nut polishing station, effluent management, laboratory procedures, workshop operations, and dispatch processes.</p> <p>Additionally, there are other documents referred for operation, maintenance and compliance purpose which are:</p> <ul style="list-style-type: none"> <li>• RSPO Supply Chain Manual</li> <li>• ESH 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>The Mill Manuals and SOP 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>	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		<p>Monitoring of the SOP mainly conducted by management of Diamond Jubilee POM and executives. Additionally, there are also other representative from headquarter responsible for monitoring purpose such as:</p> <ul style="list-style-type: none"> <li>• Visit and checking by Mill Advisor</li> <li>• Structured Oil Recovery Assessment by Headquarter Team</li> <li>• Monitoring of Oil and Kernel Losses on daily basis</li> <li>• Sustainability RSPO/MSPO Annual Internal Audit</li> </ul>	
<b>4.6.1.2</b>	<p>All palm oil mills shall implement best practices.</p> <p><b>- Major compliance -</b></p>	<p>The mill has a mechanism in place to conduct regular checks to ensure consistent implementation of procedures. The Daily Production Summary Report, observed updated for 30/06/2024, includes details such as:</p> <ul style="list-style-type: none"> <li>• Quantity of FFB received, processed, and remaining.</li> <li>• Breakdown of certified and non-certified FFB quantities</li> <li>• Mill performance based on FFB Processed</li> </ul> <p>In addition, mill also maintained documented information which include:</p> <ul style="list-style-type: none"> <li>• Monitoring of effluent and black smoke emissions</li> <li>• Parameters related to processing and production.</li> <li>• Dispatch records and tracking of scheduled waste disposal.</li> <li>• Monitoring of consistent procedure implementation through internal audits</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance									
		All the monitoring of best management practices were conducted to ensure compliance with policies and procedures regarding mill operations, financial matters, occupational safety and health (OSH), welfare, and other relevant areas.										
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.  - Major compliance -	<div>Diamond Jubilee POM continued its commitment to long term sustainability and improvements through a capital expenditure program. The management has forecasted 5 years business plan from FY 2024-2028. The projection for 5 years prepared as guidance for future planning. Sighted the annual budget FY 2024 and business plan FY 2025 - FY 2028. In the 5 years business plan include items as follows:  a) Environment Budgeting for:<ul style="list-style-type: none"><li>Effluent Treatment Plant</li><li>Boiler station</li><li>Laboratory</li></ul> b) Future planning and improvement:<table><tr><th>Project</th><th>Budget required &amp; Status</th><th>Target Completion</th></tr><tr><td>Effluent treatment plan improvement:</td><td>Budget: (figures were excluded for reason of confidentiality)</td><td>December 2024</td></tr><tr><td>In progress to install freeboard</td><td>To plan the project with engineering department</td><td></td></tr></table></div>	Project	Budget required & Status	Target Completion	Effluent treatment plan improvement:	Budget: (figures were excluded for reason of confidentiality)	December 2024	In progress to install freeboard	To plan the project with engineering department		Complied
Project	Budget required & Status	Target Completion										
Effluent treatment plan improvement:	Budget: (figures were excluded for reason of confidentiality)	December 2024										
In progress to install freeboard	To plan the project with engineering department											

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Criterion / Indicator		Assessment Findings			Compliance
		<p>indicator at all ponds</p> <p>Piping for POME application in Diamond Jubilee Estate field</p>	<p>Furrow system piping will included in CAPEX 2025</p>		
		<p>c) Crop processed with anticipated extraction ratios including a 5-year forecast.</p> <p>d) Cost components include the following:</p> <ul style="list-style-type: none"> <li>• General charges statement</li> <li>• General charges</li> <li>• Cost of supervision/ labour / overheads</li> <li>• Cost of RSPO/MSPO / Other Management system</li> <li>• Capital expenditure statement.</li> <li>• Building, utilities, welfare</li> <li>• Plant &amp; machinery / Electrical Installation</li> <li>• Office equipment / Furniture &amp; fittings</li> <li>• Plant /Mill inclusive of processing /dispatch cost</li> </ul> <p>The main key areas of the projections are as follows (figures were excluded for reason of confidentiality):</p> <ul style="list-style-type: none"> <li>• Unit cost RM/CPO</li> <li>• Operating cost</li> <li>• FFB processed (Mt)</li> <li>• CPO production (Mt)</li> </ul>			

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Criterion / Indicator		Assessment Findings	Compliance						
		<ul style="list-style-type: none"><li>• Kernal production (Mt)</li><li>• OER%</li><li>• KER%</li></ul>							
Criterion 4.6.3: Transparent and fair price dealing									
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	<div>Diamond Jubilee POM has established a pricing mechanism and conducts transactions according to letter of extension with contractors. It was noted that mill received and processes FFB from owned supplying estates. The pricing terms outlined in the contract are mutually acknowledged by Diamond Jubilee POM and contractors under Appendix 2, Schedule of Transportation Rates. Reviewed contract agreements and Letters of Award for service providers confirm this arrangement.</div> <table><tr><td>Contractor/Vendor</td><td>Work Description</td><td>Validity</td></tr><tr><td>Mxxxx Axxxxx Sdn Bhd</td><td>Transportation Service for CPO</td><td>31/10/2024</td></tr></table>	Contractor/Vendor	Work Description	Validity	Mxxxx Axxxxx Sdn Bhd	Transportation Service for CPO	31/10/2024	Complied
Contractor/Vendor	Work Description	Validity							
Mxxxx Axxxxx Sdn Bhd	Transportation Service for CPO	31/10/2024							
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	<div>The FFB suppliers/contractors were provided with contracts that are fair, legal, and transparent, including agreed-upon payment terms. These terms were specified in Clause 3.0 "Transportation Rates", Clause 4.0 "Payment Terms" within the contract agreement.</div> <div>There is substantial evidence to support that the mill consistently fulfilled their agreed payment obligations in a timely manner. All payment were made by Account Department at HQ. Verification on invoices, account statement and payment voucher for the samples contractor indicates that the payment to the contractor are made</div>	Complied						

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Criterion / Indicator		Assessment Findings			Compliance
		as per clause Payment Term in the contract agreement. Sample of documents of payment reviewed as table below:			
		Contractor/Vendor	Work Description	Validity	
		Mxxxx Axxxxx Sdn Bhd	Transportation Service for CPO	31/10/2024	
Criterion 4.6.4: Contractor					
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.  - Major compliance -	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 21/06/2024.  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.  Sampled contract agreement were reviewed during the audit. For CPO and PK transporter, the company has engaged the following contractor:  1. Mekxx Angxxx Sdn Bhd : CPO transporter. Contract valid from 01/11/2023 to 31/10/2024			Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.  - Major compliance -	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.			Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<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 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:</p> <p>1. Mekxx Angxxx Sdn Bhd : CPO transporter. Contract valid from 01/11/2023 to 31/10/2024</p>	
<b>4.6.4.3</b>	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p><b>- Minor compliance -</b></p>	<p>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.</p> <p>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.</p>	Complied

## Appendix B: Smallholder Member Details

[illegible]

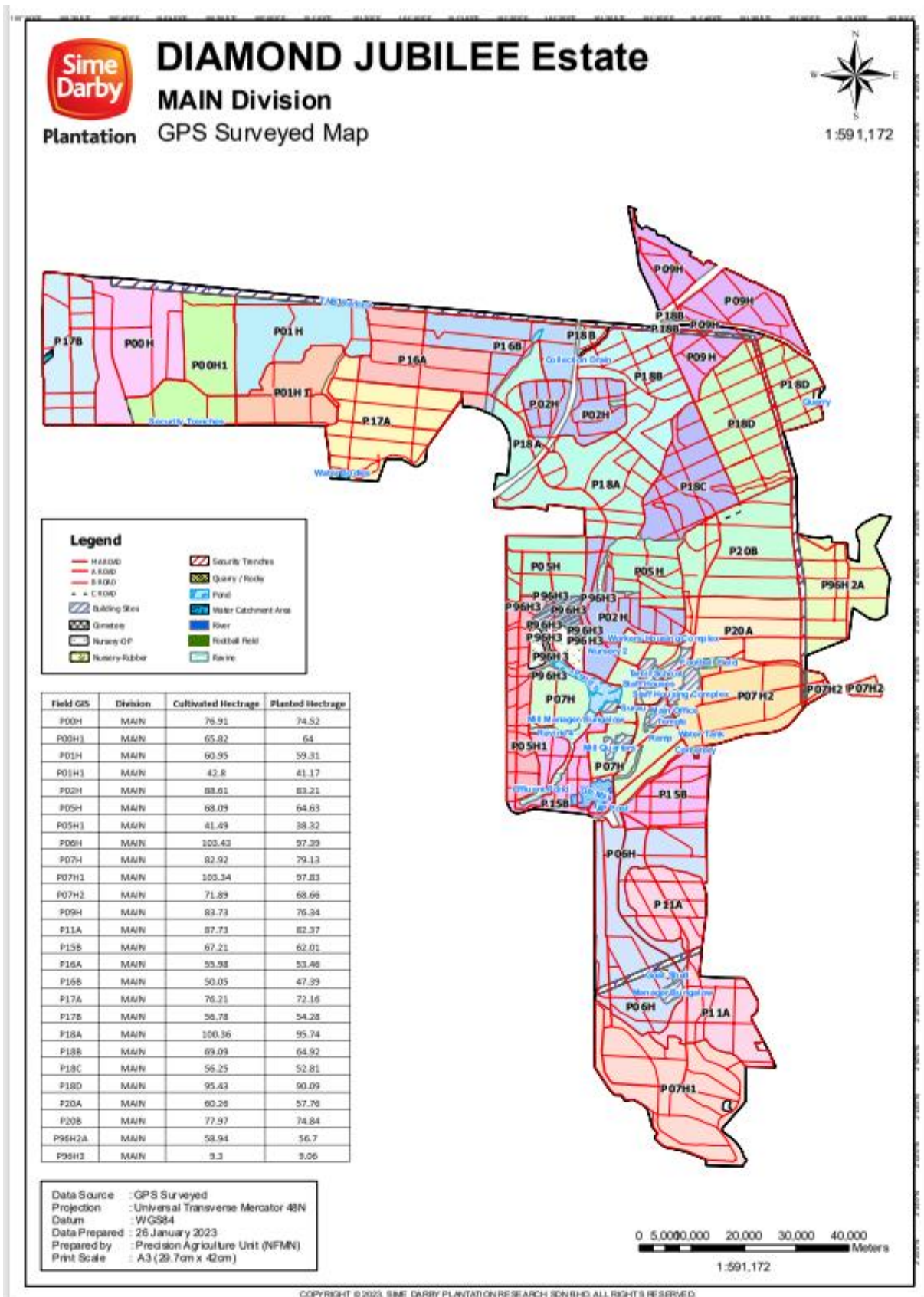
**Appendix C: Location and Field Map**



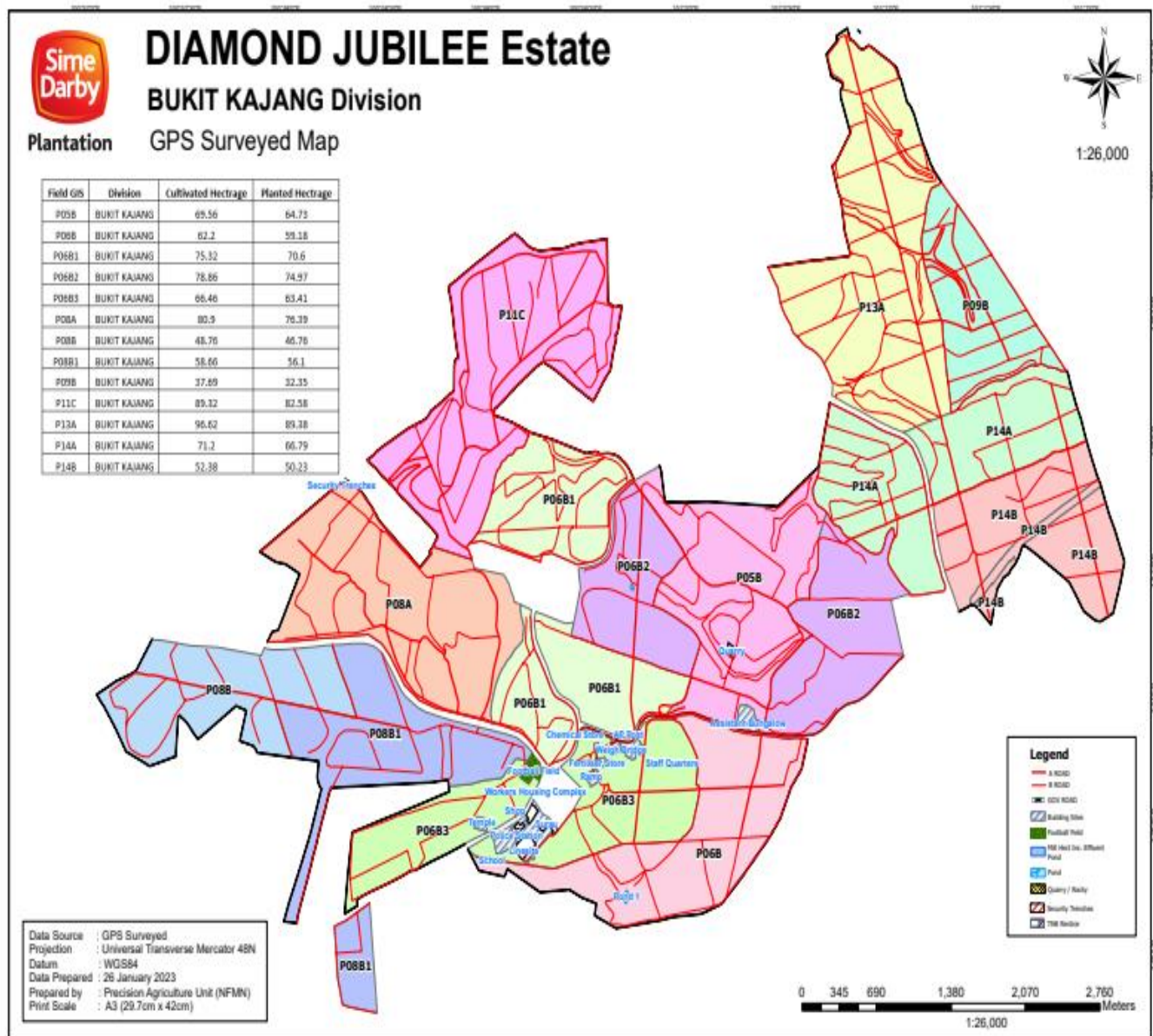


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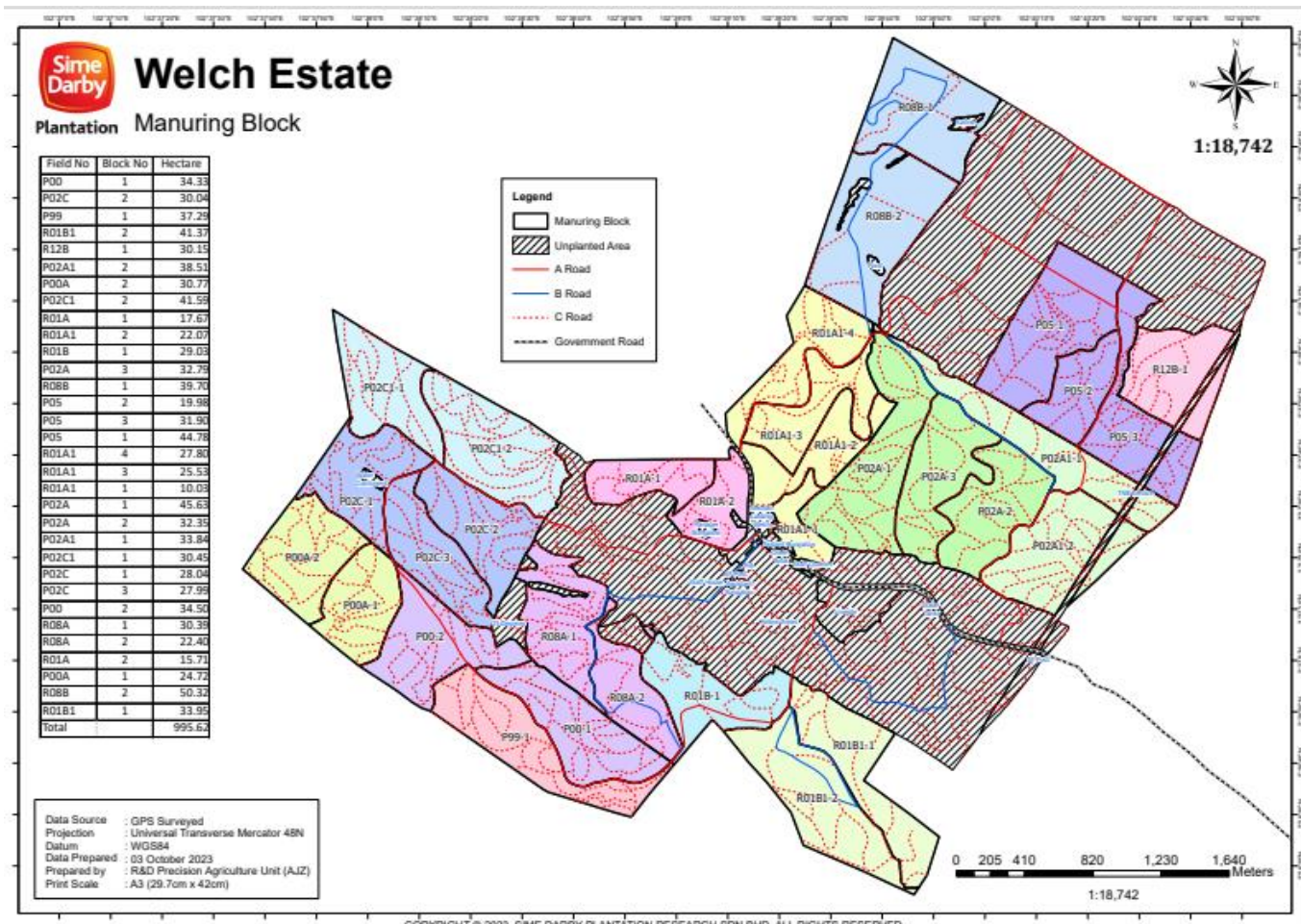


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## **Appendix D: List of Abbreviations**

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