

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- ☐ Initial Assessment
- ☒ Annual Surveillance Assessment (2_3)
- ☐ Recertification Assessment (Choose an item.)
- ☐ Extension of Scope

Client Company Name / Parent Company: SD Guthrie Berhad
Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 27) - Melalap Palm Oil Mill Location of Certification Unit: 14th KM, Jalan Tenom- Keningau, 89908 Tenom, Sabah, Malaysia
Date of Final Report: 17/12/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SD Guthrie Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 11, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 27) - Melalap Palm Oil Mill		
Location / Address	14th KM, Jalan Tenom- Keningau, 89908 Tenom, Sabah, Malaysia		
Website	https://www.sdguthrie.com/		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD)	E-mail	shylaja.vasudevan@sdguthrie.com
Telephone	+(603) 78484000 (HQ)	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 547124	Certificate Start Date	02/12/2021
Date of First Certification	21/01/2011	Certificate Expiry Date	01/12/2026
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	25 MT/ HR
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 685285	MSPO 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	06/03/2028
MSPO 682053	MSPO 2530-4:2013 General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	06/03/2028
MSPO 718818	MSPO Supply Chain Certification Standard 2018	BSI Services Malaysia Sdn Bhd	18/12/2024

4. Location(s) of Mill & Supply Bases

Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Melalap Palm Oil Mill	14th KM, Jalan Tenom-Keningau, 89908 Tenom, Sabah	5° 13' 58.00" N	115° 59' 15.00" E
Melalap Estate	14th KM, Jalan Tenom-Keningau, 89908 Tenom, Sabah	5° 12' 54.00" N	115° 58' 34.70" E
Sapong Estate	14th KM, Jalan Tenom-Keningau, 89908 Tenom, Sabah	5° 03' 51.50" N	115° 56' 57.10" E

5. Description of Supply Base

New Planting Development	<input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sapong Estate	2,155.81	45.72	1,215.74	3,417.27	63.09
Melalap Estate	1,241.48	88.29	890.60	2,220.37	55.91
Total	3,397.29	134.01	2,106.34	5,637.64	60.26

6. Plantings & Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Sapong Estate	308.63	572.61	1,274.57	-	1,847.18	308.63

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Melalap Estate	168.51	371.88	701.09	-	1,072.97	168.51
Total (ha)	477.14	944.49	1,975.66	-	2,920.15	477.14

Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Dec 2023 - Nov 2024)	Actual (Sep 2023 – Aug 2024)		Forecast (Dec 2024 - Nov 2025)
		Previous license period (Sep 23 - Nov 23)	Current license period (Dec 2023 - Aug 2024)	
Sapong Estate	29,644.22	6,795.20	15,752.62	21,283.00
Melalap Estate	16,672.35	3,830.91	9,867.26	13,286.27
Total	46,316.57	36,245.99		¹34,569.27

Note:¹Low FFB forecast due to most planted areas are of young and old palms. Some areas will also be undergoing replanting.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Dec 2023 - Nov 2024)	Actual (Sep 2023 – Aug 2024)		Forecast (Dec 2024 - Nov 2025)
		Previous license period (Sep 23 - Nov 23)	Current license period (Dec 2023 - Aug 2024)	
N/A		N/A	N/A	
Total		N/A		N/A

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)

Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Dec 2023 - Nov 2024)	Actual (Sep 2023 – Aug 2024)		Forecast (Dec 2024 - Nov 2025)
		Previous license period (Sep 23 - Nov 23)	Current license period (Dec 2023 - Aug 2024)	
Supplier AA	12,000.00	294.24	358.20	
Supplier AB		1.81	-	
Supplier AC		-	-	
Supplier AD		341.60	245.72	
Supplier AE		-	-	

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Supplier AF		-	-	
Supplier AG		-	-	
Supplier AH		69.04	136.04	
Supplier AI		72.52	56.18	
Total	12,000.00	1,575.35		

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Sep-23	3,286.41	518.93	3,805.34
2	Oct-23	3,539.53	106.58	3,646.11
3	Nov-23	3,800.17	153.70	3,953.87
4	Dec-23	3,088.51	40.92	3,129.43
5	Jan-24	3,647.75	197.86	3,845.61
6	Feb-24	2,221.48	194.66	2,416.14
7	Mar-24	2,377.64	132.04	2,509.68
8	Apr-24	2,612.56	123.96	2,736.52
9	May-24	2,694.88	48.16	2,743.04
10	Jun-24	3,224.46	19.04	3,243.50
11	Jul-24	3,092.74	23.78	3,116.52
12	Aug-24	2,659.86	15.72	2,675.58
TOTAL		36,245.99	1,575.35	37,821.34

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Dec 2023 - Nov 2024)	Actual (Sep 2023 – Aug 2024)		Forecast (Dec 2024 - Nov 2025)
	Previous license period (Sep 23 - Nov 23)	Current license period (Dec 2023 - Aug 2024)	
FFB	FFB		FFB
46,316.57 mt	10,626.11 mt	25,619.88 mt	134,569.27 mt
	TOTAL	36,245.99 mt	
CPO (OER: 20.80%)	CPO (OER: 22.07%, 21.71%)		CPO (OER: 21.79%)
9,633.85 mt	2,345.18 mt	5,561.49 mt	7,532.64 mt
	TOTAL	7,906.67 mt	

PK (KER: 4.77%)	PK (KER: 5.01 %, 4.71%)		PK (KER: 4.65%)
2,209.30 mt	532.05 mt	1,208.15 mt	1,607.47 mt
	TOTAL	1,740.20 mt	

Note:

¹Low FFB forecast due to most planted areas are of young and old palms. Some areas will also be undergoing replanting.

10A. Monthly Records of Certified CPO & PK since the last audit

No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Sep-23	691.27	159.07
2	Oct-23	818.00	179.26
3	Nov-23	835.91	193.72
4	Dec-23	650.37	147.88
5	Jan-24	808.21	179.12
6	Feb-24	527.72	108.80
7	Mar-24	499.74	109.44
8	Apr-24	581.29	130.81
9	May-24	544.39	134.21
10	Jun-24	692.76	144.39
11	Jul-24	658.31	129.15
12	Aug-24	598.70	124.35
TOTAL		7,906.67	1,740.20

11. Summary of Actual Volume sold**Current License period (Dec 2023 - Aug 2024)**

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	-	-	-	5,611.54	5,611.54
PK (MT)	295.76	-	-	960.36	1,256.12
Credits	-	-	-	-	-

Previous License period (Sep 2023 - Nov 2023)

CPO (MT)	-	-	-	2,518.66	2,518.66
PK (MT)	281.72	-	-	317.10	598.82
Credits	-	-	-	-	-

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Note: Conventional is RSPO certified material but sold as non-RSPO.

The volume sold of CPO and PK appear to be more than the volume production of CPO and PK (Table 9A) because of brought forward balance from Aug 2023 - 323.21 mt (CPO) and 115.76 mt (PK).

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (Sep 2023 - Aug 2024)

No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Buyer A	TR-ac00a342-3dd0	-	71.4
2	Buyer B	TR-2d1daec6-2064	-	30.80
3	Buyer C	TR-0f6c52a5-0a85	-	150.00
4	Buyer D	TR-232af83a-863b	-	29.52
5	Buyer E	TR-25db65a7-b151	-	103.78
6	Buyer F	TR-6f703e5d-374a	-	16.70
7	Buyer G	TR-199790e6-5788	-	35.44
8	Buyer H	TR-164b070e-fa85	-	14.56
9	Buyer I	TR-0fcd0a5-6a78	-	22.34
10	Buyer J	TR-760ef098-89f8	-	29.66
11	Buyer K	TR-a9fa4fc9-980b	-	73.28
TOTAL			-	577.48

11B. Records of certified CPO & PK Sold under other schemes since the last audit (Sep 2023 - Aug 2024)

No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

11C. Records of CPO & PK Sold as conventional since the last audit (Sep 2023 - Aug 2024)

No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Buyer AA	-	706.56
2	Buyer AB	-	357.08
3	Buyer AC	-	213.82
4	Buyer AD	5,788.62	-
5	Buyer AE	536.72	-
6	Buyer AF	1,804.86	-

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TOTAL	8,130.20	1,277.46
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11D. Records of Certified CPO Sold under RSPO Credits since the last audit (Sep 2023 - Aug 2024)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	N/A	N/A	N/A
TOTAL			N/A

12. Independent Smallholders Certified Tonnage (MT) / Volume									
	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
1	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A
Note: 1 mt = 1 credit						

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

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13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
1	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)

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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 is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **07/10/2024 - 10/10/2024**. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out off-site assessment was conducted on **03/12/2024**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

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This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Melalap Palm Oil Mill	✓	✓	✓	✓	✓
Melalap Estate	✓	✓	✓	✓	✓
Sapong Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: October 6, 2025 - October 9, 2025

Total Number of Mandays: 9.5

2.2 BSI Assessment Team

Name	Role	Competency
Valence Shem (VSH)	Team Leader	<p>Education: Holds a Bachelor of Technology BTech (Hons.) Industrial Technology, University of Science Malaysia.</p> <p>Work Experience: He has more than 20 years of working experience with 9 years in oil palm plantation industry and 13 years in management system auditing since 2009 for various standards such as ISO 14001, RSPO P&C, RSPO SCCS, MSPO and SMETA.</p> <p>Training attended: He has completed ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Assessor Course, MSPO Awareness Training, ISO 45001 Lead Auditor Course, SMETA Auditor training, HCV-HCS training and RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Mohd Razaleigh Mohamad (MRM)	Team Member	<p>Education: Holds a Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).</p> <p>Work Experience: He has 5 years' experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was</p>

		<p>Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.</p> <p>Training attended: He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed MSPO P&C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&C and SCCS).</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Zulkifli Kamarol Zaman (ZKZ)	Team Member	<p>Education: He graduated in Bachelor of Science (Agribusiness) from University Putra Malaysia (UPM) in 2008.</p> <p>Work Experience: He has 10 years' experience in oil palm industry whereas he has been working at plantation company as Estate Assistant Manager prior to joining Certification Body as an Auditor. He is familiar with the estate's daily operation as well as the Best Management Practices for oil palm cultivation. Prior to joining BSI, he was the auditor for several certification bodies. He is involved in auditing MSPO OPMC, MSPO SCCS, RSPO P&C, RSPO SCCS and PEFC CoC standard.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001 Lead Auditor Course in April 2018, Endorsed MSPO OPMC Lead Auditor Course in April 2019, Endorsed MSPO SCCS Auditor Course in September 2019, Endorsed RSPO P&C Lead Auditor Course in March 2020, Endorsed RSPO SCCS Lead Auditor Course in March 2020, PEFC Chain of Custody Training in December 2020, CQI IRCA ISO 9001:2015 Lead Auditor Course in October 2023, CQI IRCA ISO 45001:2018 Lead Auditor Course in November 2023, SA8000 Introduction & Basic Auditor Training Course in November 2023 and CQI IRCA ISO 14001:2015 Lead Auditor Course in June 2024.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Mohd Hidir Zainal Abidin (MHZ)	Team Member	<p>Education:</p> <p>Bachelor Degree in Chemical Engineering, National University of Malaysia</p> <p>Work Experience:</p>

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		<p>1) 7 years working experience in palm oil industry specifically on palm oil milling for 5 years</p> <p>2) Auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO since 2012</p> <p>Training attended:</p> <p>1) ISO 9001 Lead Auditor Course</p> <p>2) ISO 14001 Lead Auditor Course</p> <p>3) OHSAS 18001 Lead Auditor Course in 2012</p> <p>4) Endorsed RSPO P&C Lead Auditor Course in 2013</p> <p>5) MSPO Awareness Training in 2014</p> <p>6) Endorsed RSPO SCCS Lead Auditor Course</p> <p>7) SMETA Auditor training</p> <p>Aspect covered in this audit:</p> <p>Legal requirements, policies and commitment, social aspects, contract agreement, human rights, land use rights, and workers' welfare</p> <p>Language proficiency:</p> <p>English and Bahasa Malaysia</p> <p>Aspect covered in this audit:</p> <p>Off-site Critical NCR close-out.</p>
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Accompanying Persons:

Name	Role
N/A	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	VSH	ZKZ	MRM
Monday 07/10/2024	0900-0930	Opening meeting (combined with MSPO): <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation) 	✓	✓	✓
	0930-1300	Sapong Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. and documentation review.	✓	✓	✓

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Date	Time	Subjects	VSH	ZKZ	MRM
	1300-1400	Lunch break			
	1400-1630	Sapong Estate Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓
Tuesday 08/10/2024	0900-1300	Melalap Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. and documentation review.	✓	✓	✓
	1300-1400	Lunch break			
	1400-1630	Melalap Estate Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓
Wednesday 09/10/2024	0900-1300	Melalap POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓	✓
	1000-1300	Stakeholder consultation Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.), etc.	-	-	-
	1300-1400	Lunch break			
	1400-1630	Melalap POM Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, Supply Chain including Market communication and claim, etc.	✓	✓	✓

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Date	Time	Subjects	VSH	ZKZ	MRM
	1630-1700	Interim closing briefing	✓	✓	✓
Thursday 10/10/2024	0900-1130	Melalap POM RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	-	-
	1130-1200	Audit team discussion & preparation for closing meeting	✓	✓	✓
	1200-1300	Closing meeting	✓	-	-

Off-site Critical NCR close-out plan

Date	Time	Subjects	(MHZ)	ICT Planned
Friday, 29/10/2024	0900	Test call and communication on document preparation	✓	MS team, Teleconference, Skype, Webex, Telecon, Face-time, email
Tuesday 03/12/2024	0900	Description of activity for each day - opening meeting, documentation review, closing meeting, etc	✓	MS team, Teleconference, Skype, Webex, Telecon, Face-time
	0930	Verification on previous Major NC. 2554005-202410-M1: Document review and affected parties' interview (using MS team), video recording (if necessary)	✓	MS team, Teleconference, Skype, Webex, Telecon, Face-time, email
	1100	Report preparation and conclusion	✓	MS team, Teleconference, Skype, Webex, Telecon, Face-time
	1130	End of meeting	✓	MS team, Teleconference, Skype, Webex, Telecon, Face-time, email

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Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	SD Guthrie Berhad (<i>previously known as Sime Darby Plantation Berhad</i>) TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table. On 16/01/2020, under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://www.sdguthrie.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SD Guthrie Berhad (<i>previously known as Sime Darby Plantation Berhad</i>) acquired Bintang Palm Oil Mill in Johor in April 2017. As of Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently SD Guthrie Berhad (<i>previously known as Sime Darby Plantation Berhad</i>) have no control in the management. Refer TBP approval dated 13/07/2023.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	There are no new acquisitions. There is new propose on 2024 for Land legalization still in progress dated approval by RSPO on 13 July 2023 for these Estate. (1) Ladang Panjang Estate: 1,796.19 Ha.	Complied

<p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p>	<p>(2) Rantau Panjang Estate, Napal Estate / Karang Ringin Estate: 1,843.73 Ha. (3) Mangun Jaya Estate: 1,398.55 Ha. (4) Sungai Jernih Estate: 851.57 Ha. (5) Pelanjau Estate (PT BAL) & Beturus Estate (PT BAL): 4,071.76 Ha. (6) Karya Palma Estate (PT SNP): 476.70 Ha. (7) West and East Estate: 1,452.93 Ha.</p>	
<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>Although there is deviation has been identified at those Indonesia management units, but it has been justified and approved by RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p><u>Indonesia</u></p> <ul style="list-style-type: none"> - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. - PT Mitral Austral Sejahtera: The properties were sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. <p><u>Malaysia</u></p> <ul style="list-style-type: none"> - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. - Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction. <p><u>Papua New Guinea</u></p> <ul style="list-style-type: none"> - Markham Farming Company Limited (MFCL)/ Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation 	<p>Complied</p>

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	<p>Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement</p> <p><u>Liberia</u></p> <ul style="list-style-type: none"> - As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://sime-darbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/. <p>ACOP 2023 has been cross-referenced as below: https://rspo.org/members/1-0008-04-000-00/</p>	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/ 2023.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification:</p> <p>(1) NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</p> <p>(2) NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/ 2018 – no comments</p>	Complied

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	<p>https://rspo.org/public-consultation/new-britain-palm-oil-a-subsidiary-of-sime-darby-plantation-bhd-guadacanal-plain-palm-oil-ltd/</p> <p>(3) NBPOL (Ramu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</p> <p>(4) NBPOL (Ramu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</p> <p>(5) NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</p> <p>(6) NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/</p> <p>(7) NBPOL (Poliamba Limited – Lamendauen) 07/04/ 2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/</p> <p>(8) NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/</p> <p>(9) NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</p>	
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	<p>(10) NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</p> <p>(11) NBPOL (Ramu Agri Industries Ltd) 06/03/2012 – no comments captured in RSPO website: https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</p> <p>(12) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</p> <p>(13) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</p> <p>(14) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</p> <p>Management units for 12 – 14 above were disposed.</p>	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential</p>	Complied

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	<p>liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted. As of 04/09/2024, 19 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected management units) has been endorsed by RSPO.</p> <p>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about land conflict has been lodge by stakeholders as at the day of audit.</p>	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>SD Guthrie Berhad (<i>previously known as Sime Darby Plantation Berhad</i>) have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p> <p>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, no labour dispute issues reported.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about labour dispute has been lodge by stakeholders as at the day of audit.</p> <p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labour, stakeholders and communities are to be dealt using this mechanism.</p>	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	<p>SD Guthrie Berhad (<i>previously known as Sime Darby Plantation Berhad</i>) maintains corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to</p>	Complied

	<p>delivery their business complying to the laws and regulations of the country.</p> <p>Under RSPO DSF, the latest registered complaint for SD was in 2017. No latest complaint case reported in DSF.</p>	
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue is mainly waiting for Land Titles. Latest Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. HCV Assessment has been conducted for all SD Guthrie Berhad (<i>previously known as Sime Darby Plantation Berhad</i>) operations since 2010, there has been no clearance of HCV areas after the HCV Assessment has been conducted and verified during the annual RSPO External and Internal Audit reports. The liability happened as there were no HCV Assessment done at the time of planting for the cases which were entered into the RACP process.</p>	Complied
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>No critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.</p>	Complied
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Each site maintains stakeholder engagement as part of its estate/mill operations, especially in Indonesia, where company socialization is emphasized.</p> <p>Details of the latest stakeholder consultation conducted at the UoC can be found in Criteria 1.1.</p>	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	There is no scheme smallholders and/or outgrowers include in the scope of certification. Hence, this requirement is not applicable.	Not Applicable

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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB	REVISION OF THE TBP (Only applicable when revision is made)			
								Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
Manggala	Indonesia	Manggala Mill	13.836	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -1 Estate	4.919	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -2 Estate	4.922	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -3 Estate	3.995	Certified	Not Applicable	23-Nov-10					
Alur Dumai	Indonesia	Alur Dumai Mill	3.759	Certified	Not Applicable	16-Jan-12					
	Indonesia	Alur Dumai Estate	3.759	Certified	Not Applicable	16-Jan-12					
Teluk Siak	Indonesia	Teluk Siak Mill	11,555.31	Certified	Not Applicable	11-Oct-11					
	Indonesia	Teluk Siak Estate	3,321.20	Certified	Not Applicable	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	3,799.21	Certified	Not Applicable	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	448.00	Not Certified	2023	NA		Yes	2024	Land legalization process for 448 ha at Pinang Sebatang Estate is still in process.	13-Jul-23
	Indonesia	Aneka Persada Estate	4,434.90	Certified	Not Applicable	11-Oct-11					
Blang Simpo	Indonesia	Blang Simpo Mill	8,777.22	Certified	Not Applicable	3-May-13					
	Indonesia	Blang Simpo -1 Estate	3,460.06	Certified	Not Applicable	3-May-13					

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	Indonesia	Blang Simpo -2 Estate	2,677.83	Certified	Not Applicable	3-May-13					
	Indonesia	Tamiang (PT PPP) Estate	1,451.99	Certified	Not Applicable	3-May-13					
	Indonesia	Batang Ara (PT PSK) Estate	1,187.34	Certified	Not Applicable	3-May-13					
Teluk Bakau	Indonesia	Teluk Bakau Mill	13,317.81	Certified	Not Applicable	11-Oct-11					
	Indonesia	Teluk Bakau Estate	4,025.07	Certified	Not Applicable	11-Oct-11					
	Indonesia	Nusa Lestari Estate	3,456.74	Certified	Not Applicable	11-Oct-11					
	Indonesia	Nusa Perkasa Estate	5,836.00	Certified	Not Applicable	11-Oct-11					
Mandah	Indonesia	Mandah Mill	12,366.18	Certified	Not Applicable	1-Apr-14					
	Indonesia	Mandah Estate	5,053.18	Certified	Not Applicable	1-Apr-14					
	Indonesia	Rotan Semelur Estate	7,313.00	Certified	Not Applicable	1-Apr-14					
Sungai Pinang	Indonesia	Sungai Pinang Mill	6.513	Certified	Not Applicable	11-Sep-12					
	Indonesia	Sungai Pinang Estate	3,374.42	Certified	Not Applicable	11-Sep-12					
	Indonesia	Bukit Pinang Estate	3,138.58	Certified	Not Applicable	11-Sep-12					
Ladang Panjang	Indonesia	Ladang Panjang Mill	1,202.04	Certified	Not Applicable	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,202.04	Certified	Not Applicable	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,796.19	Not Certified	2023	NA		Yes	2024	Land legalization process for 1,796.19 ha is still in progress.	13-Jul-23
Rantau Panjang	Indonesia	Rantau Panjang Mill	10,139.91	Certified	Not Applicable	16-Mar-12					
Rantau Panjang	Indonesia	Bumi Ayu Estate	2,960.98	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rantau Panjang Estate	2,679.74	Certified	Not Applicable	16-Mar-12					

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	Indonesia	Rantau Panjang Estate	1,843.73	Not Certified	2023	NA		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Napal Estate/Karang Ringin	4,359.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Napal Estate/Karang Ringin	1,843.73	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Mangun Jaya Estate	139.45	Certified	Not Applicable	16-Mar-12					
	Indonesia	Mangun Jaya Estate	1,398.55	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1398.55 ha is still in process.	13-Jul-23
	Indonesia	Sungai Jernih Estate	851.57	Not Certified	2023	N/A		Yes	2024	Land legalization process of 851.57 ha is still in process.	13-Jul-23
Angsana	Indonesia	Angsana Mill	15,151.19	Certified	Not Applicable	6-Jul-11					
	Indonesia	Angsana Estate	3,250.06	Certified	Not Applicable	6-Jul-11					
	Indonesia	Gunung Sari Estate	2,826.94	Certified	Not Applicable	6-Jul-11					

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Mustika	Indonesia	Mustika Mill	14,840.76	Certified	Not Applicable	3-Jul-13					
	Indonesia	Mustika Estate	3,648.74	Certified	Not Applicable	3-Jul-13					
	Indonesia	Pantai bonati Estate	2,534.00	Certified	Not Applicable	6-Jul-11					
Gunung Aru	Indonesia	Gunung Aru Mill	12,740.54	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Aru Estate	2,684.41	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Kemas Estate	3,511.36	Certified	Not Applicable	5-Jul-11					
	Indonesia	Laut Timur Estate	3,207.28	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pantai Timur Estate	3,337.49	Certified	Not Applicable	5-Jul-11					
Ungkaya	Indonesia	Ungkaya Mill	4,145.00	Certified	Not Applicable	10-Jul-12					
	Indonesia	Ungkaya Estate	4,145.00	Certified	Not Applicable	10-Jul-12					
Rantau	Indonesia	Rantau Mill	24,169.56	Certified	Not Applicable	30-Dec-11					
	Indonesia	Rantau Estate	4,638.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Matalok Estate	3,082.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Selabak Estate (PT SAA)	3,757.67	Certified	Not Applicable	16-Mar-12					
	Indonesia	Randi Estate (PT SAA)	2,882.98	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sangkoh Estate (PT SAA)	3,789.34	Certified	Not Applicable	16-Mar-12					
	Indonesia	Lanting Estate (PT LMR)	3,249.27	Certified	Not Applicable	16-Mar-12					
Betung	Indonesia	Betung Mill	7,579.57	Certified	Not Applicable	1-Apr-14					
	Indonesia	Betung Estate	4,266.00	Certified	Not Applicable	1-Apr-14					
	Indonesia	Sekayu Estate	3,313.57	Certified	Not Applicable	1-Apr-14					
Bebunga	Indonesia	Bebunga Mill	14,274.77	Certified	Not Applicable	16-Mar-12					
	Indonesia	Bebunga Estate	3,958.43	Certified	Not Applicable	16-Mar-12					

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	Indonesia	Bakau Estate	5,342.14	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sungai Cengal Estate	4,974.20	Certified	Not Applicable	16-Mar-12					
Pondok Labu	Indonesia	Pondok Labu Mill	15,876.20	Certified	Not Applicable	16-Mar-12					
	Indonesia	Pondok Labu Estate	3,569.53	Certified	Not Applicable	16-Mar-12					
	Indonesia	Binturung Estate	4,072.01	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rampa Estate	3,656.20	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sesulung Estate	4,578.46	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sekunyir Mill	7,734.59	Certified	Not Applicable	23-Nov-10					
Sekunyir	Indonesia	Sekunyir Estate	3,555.19	Certified	Not Applicable	23-Nov-10					
	Indonesia	Seruyan Estate	4,179.40	Certified	Not Applicable	23-Nov-10					
	Indonesia	Sukamandang Mill	14,779.92	Certified	Not Applicable	5-Jul-11					
Sukamandang	Indonesia	Sukamandang Estate	3,936.56	Certified	Not Applicable	5-Jul-11					
	Indonesia	Sapiri Estate	3,530.90	Certified	Not Applicable	5-Jul-11					
	Indonesia	Baras Danum Estate	3,664.60	Certified	Not Applicable	5-Jul-11					
	Indonesia	Kuala Kuayan Estate	3,647.86	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pemantang Mill	16,601.66	Certified	Not Applicable	5-Jul-11					
Pemantang	Indonesia	Pemantang Estate	3,857.91	Certified	Not Applicable	5-Jul-11					
	Indonesia	Kawan Batu Estate	4,400.00	Certified	Not Applicable	5-Jul-11					
	Indonesia	Hatantiring Estate	3,811.00	Certified	Not Applicable	5-Jul-11					
	Indonesia	Batang Garing Estate	4,532.75	Certified	Not Applicable	5-Jul-11					
	Indonesia	Lembiru Mill	9,409.07	Certified	Not Applicable	3-Jul-14					
Lembiru	Indonesia	Lembiru Estate	4,929.49	Certified	Not Applicable	3-Jul-14					

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	Indonesia	Awatan Estate	3,476.79	Certified	Not Applicable	3-Jul-14					
	Indonesia	Pelanjau Estate (PT BAL)	1,002.79	Certified	Not Applicable	3-Jul-19					
	Indonesia	Pelanjau Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Beturus Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Karya Palma Estate (PT SNP)	476.70	Not Certified	2023	N/A		Yes	2024	Land legalization process for 476.70 ha is still in process.	13-Jul-23
Bukit Ajong	Indonesia	Bukit Ajong Mill	11,498.82	Certified	Not Applicable	18-Oct-10					
	Indonesia	West Estate	4,562.34	Certified	Not Applicable	18-Oct-10					
	Indonesia	West Estate	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
	Indonesia	East Estate	2,665.48	Certified	Not Applicable	18-Oct-10					
	Indonesia	East Estate/Sei Mawang	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha	13-Jul-23

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										(West and East Estate) is still in process.	
Sg. Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	Not Applicable	12-Aug-10					
	Malaysia	Anak Kulim Estate	1,523.35	Certified	Not Applicable	12-Aug-10					
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	Not Applicable	12-Aug-10					
	Malaysia	Somme Estate	941.56	Certified	Not Applicable	12-Aug-10					
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	Not Applicable	12-Aug-10					
	Malaysia	Padang Buluh Estate	4,008.47	Certified	Not Applicable	12-Aug-10					
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	Not Applicable	12-Aug-10					
	Malaysia	Jentayu Estate	2,178.59	Certified	Not Applicable	12-Aug-10					
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	Not Applicable	5-Oct-11					
	Malaysia	Chersonese Estate	3,293.72	Certified	Not Applicable	5-Oct-11					
	Malaysia	Kalumpang Estate	2,716.80	Certified	Not Applicable	5-Oct-11					
	Malaysia	Tali Ayer Estate	3,756.10	Certified	Not Applicable	5-Oct-11					
	Malaysia	Holyrood Estate	1,332.74	Certified	Not Applicable	5-Oct-11					
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	Not Applicable	18-Jun-11					
	Malaysia	Kamuning Estate	3,888.43	Certified	Not Applicable	18-Jun-11					
	Malaysia	Elphil Estate	1,865.43	Certified	Not Applicable	18-Jun-11					
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	Not Applicable	18-Jun-11					
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	Not Applicable	5-Oct-11					
	Malaysia	Flemington Estate	1,906.84	Certified	Not Applicable	5-Oct-11					
	Malaysia	Bagan Dato Estate	3,781.86	Certified	Not Applicable	5-Oct-11					

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	Malaysia	Sabak Bernam Estate	2,511.79	Certified	Not Applicable	5-Oct-11					
	Malaysia	Sg. Samak Estate	3,025.74	Certified	Not Applicable	5-Oct-11					
Seri Intan/Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	Not Applicable	3-Mar-11					
	Malaysia	Selaba Oil Mill	1,549.75	Certified	Not Applicable	3-Mar-11					
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sabrang Estate	3,945.23	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sogomana Estate	2,214.08	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sg. Wangi Estate	2,226.66	Certified	Not Applicable	3-Mar-11					
	Malaysia	Bikam Estate	2,075.16	Certified	Not Applicable	3-Mar-11					
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	Not Applicable	3-Mar-11					
Tennamaram	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	Not Applicable	3-Mar-11					
	Malaysia	Tennamaram Estate	1,981.60	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	Not Applicable	3-Mar-11					
	Malaysia	Bukit Talang Estate	3,572.44	Certified	Not Applicable	3-Mar-11					
Bukit Kerayong	Malaysia	Bukit Benut Oil Mill	6,346.90	Certified	Not Applicable	15-Apr-11					
	Malaysia	Bukit Benut Estate	2,699.28	Certified	Not Applicable	15-Apr-11					
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	Not Applicable	15-Apr-11					
East	Malaysia	East Oil Mill	10,902.94	Certified	Not Applicable	19-May-10					
	Malaysia	East Estate	5,634.45	Certified	Not Applicable	19-May-10					
	Malaysia	Sepang Estate	2,092.28	Certified	Not Applicable	19-May-10					
	Malaysia	Dusun Durian Estate	3,176.21	Certified	Not Applicable	19-May-10					

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West	Malaysia	West Oil Mill	5,912.69	Certified	Not Applicable	19-May-10					
	Malaysia	West Estate	5,912.69	Certified	Not Applicable	19-May-10					
Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	Not Applicable	7-Jul-11					
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	Not Applicable	7-Jul-11					
Kerdau	Malaysia	Kerdau Oil Mill	13,781.50	Certified	Not Applicable	7-Jul-11					
	Malaysia	Kerdau Estate	5,683.04	Certified	Not Applicable	7-Jul-11					
	Malaysia	Mentakab Estate	3,266.49	Certified	Not Applicable	7-Jul-11					
	Malaysia	Chenor Estate	2,834.98	Certified	Not Applicable	7-Jul-11					
	Malaysia	Sg Mai Estate	1,996.99	Certified	Not Applicable	7-Jul-11					
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	Not Applicable	7-Jul-11					
	Malaysia	Jabor Estate	2,332.92	Certified	Not Applicable	7-Jul-11					
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	Not Applicable	30-Dec-11					
	Malaysia	Labu Estate	4,529.72	Certified	Not Applicable	30-Dec-11					
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	Not Applicable	19-May-10					
	Malaysia	Tanah Merah Estate	4,341.73	Certified	Not Applicable	19-May-10					
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	Not Applicable	19-May-10					
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sua Betong Estate	2,870.75	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sengkang Estate	2,831.51	Certified	Not Applicable	18-Feb-14					
	Malaysia	Bradwall Estate	3,828.34	Certified	Not Applicable	18-Feb-14					
	Malaysia	PD Lukut Estate	1,523.79	Certified	Not Applicable	18-Feb-14					
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	Not Applicable	18-Feb-14					

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	Malaysia	Sg. Bahru Estate	1,427.31	Certified	Not Applicable	18-Feb-14					
	Malaysia	Salak Estate	3,868.86	Certified	Not Applicable	18-Feb-14					
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	Not Applicable	7-Jul-11					
	Malaysia	Muar River Estate	1,584.62	Certified	Not Applicable	7-Jul-11					
	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	Not Applicable	7-Jul-11					
	Malaysia	Kok Foh Estate	2,275.84	Certified	Not Applicable	7-Jul-11					
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	Not Applicable	7-Jul-11					
	Malaysia	St. Helier Estate	1,992.65	Certified	Not Applicable	7-Jul-11					
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	Not Applicable	7-Jul-11					
	Malaysia	Pertang Estate	1,052.49	Certified	Not Applicable	7-Jul-11					
Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	Not Applicable	20-May-10					
	Malaysia	Kempas Estate	4,505.45	Certified	Not Applicable	20-May-10					
	Malaysia	Tangkah Estate	2,537.78	Certified	Not Applicable	20-May-10					
	Malaysia	Kemuning Estate	2,671.05	Certified	Not Applicable	20-May-10					
	Malaysia	Serkam Estate	2,114.23	Certified	Not Applicable	20-May-10					
Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	Not Applicable	5-Oct-11					
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	Not Applicable	5-Oct-11					
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	Not Applicable	5-Oct-11					
	Malaysia	Welch Estate	1,447.82	Certified	Not Applicable	5-Oct-11					
Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	Not Applicable	28-Jan-14					
	Malaysia	Pagoh Estate	2,325.93	Certified	Not Applicable	28-Jan-14					

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	Malaysia	Lanadron Estate	1,964.44	Certified	Not Applicable	28-Jan-14					
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	Not Applicable	28-Jan-14					
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	Not Applicable	18-Nov-10					
	Malaysia	Chaah Estate	2,795.36	Certified	Not Applicable	18-Nov-10					
	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	Not Applicable	18-Nov-10					
	Malaysia	North Labis Estate	3,532.91	Certified	Not Applicable	18-Nov-10					
Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	Not Applicable	19-May-10					
	Malaysia	Gunung Mas Estate	3,466.17	Certified	Not Applicable	19-May-10					
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	Not Applicable	19-May-10					
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	Not Applicable	19-May-10					
	Malaysia	Yong Peng Estate	2,975.41	Certified	Not Applicable	19-May-10					
Bukit Benut	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	Not Applicable	5-Oct-11					
	Malaysia	Bukit Benut Estate	2,799.78	Certified	Not Applicable	5-Oct-11					
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	Not Applicable	5-Oct-11					
	Malaysia	CEP Nyior Estate	1,955.19	Certified	Not Applicable	5-Oct-11					
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	Not Applicable	11-Apr-11					
	Malaysia	Ulu Remis Estate	2,598.25	Certified	Not Applicable	11-Apr-11					
	Malaysia	Cenas Estate	1,974.06	Certified	Not Applicable	11-Apr-11					
	Malaysia	Bukit Badak Estate	3,234.25	Certified	Not Applicable	11-Apr-11					
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	Not Applicable	11-Apr-11					
	Malaysia	Pekan Estate	3,258.70	Certified	Not Applicable	11-Apr-11					
	Malaysia	Sembrong Estate	1,778.88	Certified	Not Applicable	11-Apr-11					

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Bukit Kerayong	Malaysia	Bukit Kerayong Oil Mill	11,371.82	Certified	Not Applicable	29-Mar-11					
	Malaysia	Sri Pulau Estate	2,049.87	Certified	Not Applicable	29-Mar-11					
	Malaysia	Kulai Estate	3,023.42	Certified	Not Applicable	29-Mar-11					
	Malaysia	Layang Estate	3,258.90	Certified	Not Applicable	29-Mar-11					
	Malaysia	CEP Renggam Estate	3,039.63	Certified	Not Applicable	29-Mar-11					
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tunku Estate	3,199.05	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tigowis Estate	2,074.02	Certified	Not Applicable	1-Oct-08					
	Malaysia	Sentosa Estate	3,545.54	Certified	Not Applicable	1-Oct-08					
	Malaysia	Segaliud Estate	4,820.13	Certified	Not Applicable	1-Oct-08					
Melalap	Malaysia	Melalap Oil Mill	5246.18	Certified	Not Applicable	21-Jan-11					
	Malaysia	Melalap Estate	2,096.73	Certified	Not Applicable	21-Jan-11					
	Malaysia	Sapong Estate	3,149.45	Certified	Not Applicable	21-Jan-11					
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	Not Applicable	16-Jan-09					
	Malaysia	Binuang Estate	3,271.08	Certified	Not Applicable	16-Jan-09					
	Malaysia	Sungang Estate	3,407.98	Certified	Not Applicable	16-Jan-09					
	Malaysia	Tingayu Estate	1,881.08	Certified	Not Applicable	16-Jan-09					
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	Not Applicable	16-Jan-09					
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	Not Applicable	16-Jan-09					
	Malaysia	Giram Estate	4,166.98	Certified	Not Applicable	16-Jan-09					
	Malaysia	Mostyn Estate	4,178.04	Certified	Not Applicable	16-Jan-09					

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Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	Not Applicable	16-Jan-09					
	Malaysia	Merotai Estate	3,052.66	Certified	Not Applicable	16-Jan-09					
	Malaysia	Imam Estate	3,773.56	Certified	Not Applicable	16-Jan-09					
	Malaysia	Tiger Estate	2,497.86	Certified	Not Applicable	16-Jan-09					
	Malaysia	Table Estate	2,221.63	Certified	Not Applicable	16-Jan-09					
Lavang	Malaysia	Lavang Oil Mill	24,836.54	Certified	Not Applicable	30-Dec-11					
	Malaysia	Lavang Estate	4,363.83	Certified	Not Applicable	30-Dec-11					
	Malaysia	Rasan Estate	3,454.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Belian Estate	2,847.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Kelida Estate	2,460.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Lavang (Special) Estate	included under Lavang Estate Ha	Certified	Not Applicable	30-Dec-11					
	Malaysia	Pekaka Estate	2,626.14	Certified	Not Applicable	30-Dec-11					
	Malaysia	Ruai Estate	2,460.96	Certified	Not Applicable	30-Dec-11					
	Malaysia	Dulang Estate	2,548.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Charquest Estate	1,448.71	Certified	Not Applicable	30-Dec-11					
	Malaysia	Paroh Estate	2,627.90	Certified	Not Applicable	30-Dec-11					
Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	Not Applicable	30-Dec-11					
	Malaysia	Rajawali Estate	6,087.27	Certified	Not Applicable	30-Dec-11					
	Malaysia	Samudera Estate	3,308.60	Certified	Not Applicable	30-Dec-11					

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	Malaysia	Semarak Estate	2,248.68	Certified	Not Applicable	30-Dec-11					
	Malaysia	Bayu Estate	2,459.90	Certified	Not Applicable	30-Dec-11					
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	Not Applicable	30-Dec-11					
	Malaysia	Derawan Estate	2,490.79	Certified	Not Applicable	30-Dec-11					
	Malaysia	Sahua Estate	2,644.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Takau Estate	2,107.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Damai Estate	2,287.04	Certified	Not Applicable	30-Dec-11					
	Malaysia	Damai Estate	2,287.04	Certified	Not Applicable	30-Dec-11					
Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Tetere Estate	2,947.79	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	Not Applicable	18-Mar-11					
Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	Not Applicable	15-Feb-13					

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	PNG	Giligili Estate	1,095.47	Certified	Not Applicable	15-Feb-13					
	PNG	Hagita Estate	2,450.02	Certified	Not Applicable	15-Feb-13					
	PNG	Waigani Estate	2,341.13	Certified	Not Applicable	15-Feb-13					
	PNG	Sagarai Estate	2,864.55	Certified	Not Applicable	15-Feb-13					
	PNG	Padipadi Estate	4,517.67	Certified	Not Applicable	15-Feb-13					
	PNG	Mariawatte Estate	1,680.14	Certified	Not Applicable	15-Feb-13					
	PNG	Smallholders - East Gurney Estate (259)	450.59	Certified	Not Applicable	15-Feb-13					
	PNG	Smallholders - West Gurney Estate (231)	479.13	Certified	Not Applicable	15-Feb-13					
	PNG	Smallholders - East Sagarai Estate (156)	283.93	Certified	Not Applicable	15-Feb-13					
	PNG	Smallholders - West Sagarai Estate (212)	345.96	Certified	Not Applicable	15-Feb-13					
Poliamba (POL)	Papua New Guinea	Poliamba Oil Mill	10,720.53	Certified	Not Applicable	19-Mar-12					
	PNG	Kara Estate	1,032.10	Certified	Not Applicable	19-Mar-12					
	PNG	Nalik Estate	2,666.75	Certified	Not Applicable	19-Mar-12					
	PNG	West Coast Estate	627.60	Certified	Not Applicable	19-Mar-12					
	PNG	Noatsi Estate	2,064.10	Certified	Not Applicable	19-Mar-12					
	PNG	Madak Estate	1,517.11	Certified	Not Applicable	19-Mar-12					
	PNG	Smallholders -North Division (615)	1,022.12	Certified	Not Applicable	19-Mar-12					
	PNG	Smallholders- South Division (866)	1,257.21	Certified	Not Applicable	19-Mar-12					

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	PNG	Smallholders -West Division (309)	533.54	Certified	Not Applicable	19-Mar-12					
Ramu Agricultural Industries Ltd (RAIL)	Papua New Guinea	Gusap Mill	14,606.08	Certified	Not Applicable	5-Aug-10					
	PNG	Gusap East (Gusap) Estate	2,856.45	Certified	Not Applicable	5-Aug-10					
	PNG	Gusap West (Paddock) Estate	3,019.09	Certified	Not Applicable	5-Aug-10					
	PNG	Surinam Estate	2,154.14	Certified	Not Applicable	5-Aug-10					
	PNG	Dumpu Estate	2,254.36	Certified	Not Applicable	5-Aug-10					
	PNG	Ngaru Estate	854.33	Certified	Not Applicable	5-Aug-10					
	PNG	J Estate (Jephcott) Estate	2,824.01	Certified	Not Applicable	5-Aug-10					
	PNG	Smallholders - Madang VOPs (71)	360.00	Certified	Not Applicable	5-Aug-10					
	PNG	Smallholders - Morobe VOPs (253)	283.70	Certified	Not Applicable	5-Aug-10					
Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill		Certified	Not Applicable	1-Feb-13					
	PNG	Mamba Oil Mill		Certified	Not Applicable	1-Feb-13					
	PNG	Embi Estate	1,737.78	Certified	Not Applicable	1-Feb-13					
	PNG	Ambogo Estate	2,040.00	Certified	Not Applicable	1-Feb-13					
	PNG	Sangara Estate	1,780.00	Certified	Not Applicable	1-Feb-13					
	PNG	Sumbiripa Estate	2,545.00	Certified	Not Applicable	1-Feb-13					
	PNG	Mamba Estate	4,013.10	Certified	Not Applicable	1-Feb-13					
	PNG	Sambogo Estate	2,637.85	Certified	Not Applicable	1-Feb-13					

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	PNG	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	Not Applicable	1-Feb-13					
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Kumbango Oil Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Kapiura Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Numundo Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Waraston Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Bebere Estate	2,226.71	Certified	Not Applicable	10-Sep-08					
	PNG	Kumbango Estate	2,610.80	Certified	Not Applicable	10-Sep-08					
	PNG	Togulo Estate	1,509.20	Certified	Not Applicable	10-Sep-08					
	PNG	Dami Estate	1,507.00	Certified	Not Applicable	10-Sep-08					
	PNG	Waisisi Estate	1,090.00	Certified	Not Applicable	10-Sep-08					
	PNG	Kautu Estate	4,280.60	Certified	Not Applicable	10-Sep-08					
	PNG	Kararusu Estate	2,387.64	Certified	Not Applicable	10-Sep-08					
	PNG	Moroa Estate	848.16	Certified	Not Applicable	10-Sep-08					

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PNG	Bilomi Estate	2,011.70	Certified	Not Applicable	10-Sep-08					
PNG	Loata Estate	562.00	Certified	Not Applicable	10-Sep-08					
PNG	Haella Estate	4,220.30	Certified	Not Applicable	10-Sep-08					
PNG	Garu Estate	3,709.60	Certified	Not Applicable	10-Sep-08					
PNG	Daliavu Estate	2,484.10	Certified	Not Applicable	10-Sep-08					
PNG	Sapuri Estate	2,180.90	Certified	Not Applicable	10-Sep-08					
PNG	Malilimi Estate	3,837.00	Certified	Not Applicable	10-Sep-08					
PNG	Rigula Estate	3,720.00	Certified	Not Applicable	10-Sep-08					
PNG	Nomundo Estate	2,645.17	Certified	Not Applicable	10-Sep-08					
PNG	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	Not Applicable	10-Sep-08					
PNG	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	Not Applicable	10-Sep-08					
PNG	Lolokoru Estate	2,453.10	Certified	Not Applicable	10-Sep-08					
PNG	Ove Estate	3,541.00	Certified	Not Applicable	10-Sep-08					
PNG	Tamare Estate	1,362.70	Certified	Not Applicable	10-Sep-08					
PNG	Smallholders LSS Mosa (1822)	5,008.53	Certified	Not Applicable	10-Sep-08					
PNG	Smallholders VOP East (1817)	5,324.37	Certified	Not Applicable	10-Sep-08					
PNG	Smallholders VOP Central (1964)	5,756.57	Certified	Not Applicable	10-Sep-08					
PNG	Smallholders VOP West (1279)	2,804.10	Certified	Not Applicable	10-Sep-08					

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	PNG	Smallholders LSS Kapiura (551)	551.00	Certified	Not Applicable	10-Sep-08					
	PNG	Smallholders VOP Kapiura (850)	847.00	Certified	Not Applicable	10-Sep-08					
	PNG	Smallholders Kaulong/Akami/Pushiki/R epamira/Sakapei (20)	700.37	Certified	Not Applicable	10-Sep-08					
Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	Not Applicable	27-Mar-20				There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.	
	PNG	Munum Estate	1,734.57	Certified	Not Applicable	27-Mar-20					
	PNG	Maralumi Estate	2,427.15	Certified	Not Applicable	27-Mar-20					
	PNG	Erap Estate	1,237.68	Certified	Not Applicable	27-Mar-20					

3.3 Details of Nonconformities

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

During this Assessment there were one (1) Critical; zero (0) Minor nonconformities and one (1) Opportunity For Improvement raised. The Melalap Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2554005-202410-M1	Issued Date	10/10/2024
Due Date	08/01/2025	Closure Date	04/12/2024
Indicator & Category (Critical / Minor)	3.3.2 – Critical (escalated from Minor)		
Statement of Nonconformity:	The mechanism to check consistent implementation of procedures and legal terms was not adequately demonstrated.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<ol style="list-style-type: none"> 1) Based on site visit at the river buffer zones at Sapong Estate Field No. P00P1 and Melalap Estate Field No. P18B, there was no marking to show the zone boundaries made. This is not in-line with the SD Guthrie's Riparian Reserve Management Document Item 3.1.1 Map & mark the riparian reserve which reads, "The reserve boundaries should be marked out clearly on official maps and documents, and on the ground to prevent accidental disturbance, clearing or encroachment". 2) Melalap Estate has had their EIA report for replanting of 564.58 ha approved by the EPD Sabah. However, there was no evidence to show that the Environmental Compliance Report has been conducted. This is not in line with the terms stipulated in the "Surat Akujanji" dated 23/01/2019 [ref.: JPAS/PP/TNM/600-1/11/1/207(37)], clause 5.0 (ii) which requires the ECR to be conducted six monthly. 3) Melalap Estate has established their waste landfill at Field No. P02P1. However, there was no evidence that shows the location of the landfill has been agreed upon by the local authorities. This is not in-line with SD Guthrie's Waste Management Procedures for Upstream Malaysia 2022, clause 5.2 which reads, "Site of the landfill should be marked on operation map and agreed upon by HOU and local authorities". 		
Corrections:	<ol style="list-style-type: none"> 1) <ol style="list-style-type: none"> i) Immediate Assessment: Conduct a detailed assessment of the current state of the river buffer zones to identify any other areas of concern resulting from erosion or environmental changes. ii) Re-establishment of Boundaries: Implement a plan to clearly mark the riparian reserve boundaries according to IEA guidelines for rivers wider than 40 meters, with a reserve width of 50 meters. This plan should include 		

	<p>ringing trees with red paint on the trunks and installing permanent signage that is easily recognizable.</p> <p>2) Ou Management has requested a quotation from consultant, Chemsains Consultant Sdn Bhd to perform ECR for overall 1,241.48 hectareage (inclusive of new EIA approval for Melalap Estate overall replanting area according Long Range replanting Program). Quotation was received on 7/10/24 and the ECR is planned in November 2024</p> <p>3) <ul style="list-style-type: none"> OU Management has initiated the process to obtain approval from local authority on 8th October 2024 for the existing landfill. The landfill has been approved by Majlis Daerah Tenom on 09th October 2024. OU Management has expedited the bin repair progress in order to make sure that the domestic waste can be pick up by Majlis Daerah Tenom as practiced previously. The new quotation for the repair is in progress. </p>
Root Cause Analysis:	<p>1) The primary reason for the lack of boundary markings is insufficient monitoring by estate management in the buffer zone, which has led to a failure to record the area properly.</p> <p>2) The ECR was not conducted for 564.58 ha of replanting area due to no monitoring mechanism in place in order to ensure compliance to JPAS requirement with regards to ECR. This matter was also not discussed in any operational meeting by OU Management.</p> <p>3) The normal practice for waste disposal for Melalap Estate is through Majlis Daerah Tenom, where bin will be collected and disposed at a public waste disposal facility. However, due to bin damage (currently under repair), OU Management has prepared a landfill at Field No. P02P1 to serve as a temporary waste disposal facility until the bin is ready. Since the facility is not permanent, OU Management has an understanding that notification and agreement from local authority is not required and overlooked to escalate this matter to RHSE for their advice.</p>
Corrective Actions:	<p>1) i) Documentation: Create a map marking the newly established boundaries and the locations of signage. This will serve as a reference for monitoring and maintenance. Record the dates and details of the marking activities for accountability and future reference. ii) Monitoring and Maintenance: Schedule regular inspections (at least quarterly) to assess the condition of the boundary markers and signage. Touch up paint as needed and replace any damaged signs to maintain visibility and clarity.</p>

	<p>iii) Stakeholder Awareness: Inform all staff and stakeholders about the new boundary markings through training sessions, meetings, or informational sharing.</p> <p>2)</p> <p>Monitoring:</p> <p>i) ECR discussion will be made a permanent agenda in quarterly ESH meeting in order to monitor the compliance as well as monitoring continuity should the Management changes in future.</p> <p>ii) A specific monitoring plan will be developed in order to monitor the schedule for ECR to be conducted for that particular year.</p> <p>3)</p> <p>i) Additional bin: OU Management will obtain additional bin as a standby in case the current bin is damaged/ requires repair. Budget request in CAPEX will be done in 2025.</p> <p>ii) Monitoring: Should the same situation happen in the future that would require a landfill to be opened at the field, OU Management will ensure that the same location agreed with local authority to be used. If new site is proposed, another approval will be obtained from the local authority.</p>
Assessment Conclusion:	<p>1)</p> <p>i) Buffer zone assessment report dated 12/10/2024 was verified. Assessment overview for buffer zone in Melalap and Sapong Estate as to re-identify/re-demarcate/marked @ signage placement for further monitoring.</p> <p>ii) Re-establishment of boundary has been done by estate's team and verified via video recordings. Location of the protected areas (riparian buffer zone) at both Sapong and Melalap Estate have been identified and marked with GPS coordinate for easy reference.</p> <p>iii) Marking of specific riparian buffer zone area has been marked in the estate map. i.e., Melalap Estate (Field 2018B, P01K and P00K)</p> <p>iv) Monitoring of buffer zone and HCV in quarterly basis (minimum), however the estate has carried out more frequent inspection in weekly basis. Based on patrolling records in November 2024, no serious or negative issues reported.</p> <p>v) Latest awareness training was carried out on 13/11/2024 at Sapong Estate. Related training material and records were made available for verification.</p> <p>2)</p> <p>i) Quotation received from the consultant, Chemsain dated 7/10/2024, ref: CK/MO4/11/102024/0207 was verified.</p> <p>ii) Approval for the PO issuance was sighted on 2/12/2024, PO no. 4300799001 to the appointed consultant, Chemsain Konsultant Sdn Bhd. The onsite visit is expected to be completed by end of December 2024.</p>

	<p>iii) An ad-hoc ESH meeting dated 11/10/2024 has included ECR discussion as permanent agenda in the ESH meeting in order to monitor the compliance as well as monitoring continuity should the Management changes in future.</p> <p>iv) ECR monitoring plan has been established and in line with "Aku Janji" ref:JPAS/PP/TNM/600-1/11/1/534 dated 23/09/2024. The frequency of monitoring is scheduled every 6 monthly, latest by 30 April and 31 October until completion of project.</p> <p>3)</p> <p>i) Landfill location has been approved by Majlis Daerah Tenom on 9/10/2024. The application and approval letter were made available for verification.</p> <p>ii) Bin repair is still in progress as reported in progress/Gantt chart on weekly basis.</p> <p>iii) Issues related to waste handling and disposal was discussed on the latest/ad-hoc ESH meeting dated 11/10/2024. Budget will be included in next year's CAPEX @ 2025 for the new bin for domestic waste collection/disposal by Majlis Daerah Tenom.</p> <p>iv) OU Management will ensure that the same location agreed with local authority to be used. If new site is proposed, another approval will be obtained from the local authority. The appointed HSE person in charge (senior assistant) will ensure the process to be fully adhered if the same situation happened in future.</p> <p>All implemented actions have been reviewed and found to be sufficient to effectively close the NC on 4/12/2024. Continuous implementation will be further verified in the next assessment.</p>
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Opportunity for Improvements	
OFI #	Description
OFI 1	<p>2554005-202410-I1</p> <p><u>Indicator 1.1.1</u></p> <p>The completeness of the GPS maps of Melalap and Sapong estates can be further improved. As of now, the maps provided to the CB do not tally with the total certified area stated in the RSPO Certificate. The total certified area of both estates is 5,637.64 ha. However, some areas were not included in the maps which made the total area plotted on the maps are lesser than the certified area.</p>

Positive Findings	
PF #	Description
PF 1	Good cooperation from the management team in the assessment activity.
PF 2	Retrieval of relevant documents was efficient.
PF 3	High interest was shown by the sampled workforce in implementing the RSPO Standard requirements.

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2388152-202309-M1	Issued Date	07/09/2023
Due Date	06/12/2023	Closure Date	26/10/2023
Indicator & Category (Critical / Minor)	7.10.3 – Critical		
Statement of Nonconformity:	The Mitigation Measures for Pollution prevention plan was not effectively implemented.		
Requirement Reference:	Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.		
Objective Evidence:	During site visit at tractor parking bay Sapong Estate, it was observed 3 tractors were parked there. Based on interview with person in charge, 2 unit was write off units, while another 1 unit under repair. Sighted evidence of signage under repair. Sighted leakage of lubricant from tractor under repair and there is no mitigating measures for that. It was not in line with Pollution Prevention Plan FY 2023 Sapong Estate dated 05/02/2023, Issue: Leaking of lubricant, oil from servicing, parking tractor parking area, mitigating measures: To used oil tray to prevent leakage of used oil.		
Corrections:	<ol style="list-style-type: none"> 1) Oil tray to be placed immediately for every tractor in parking position to ensure any leakages do not contaminate the ground. 2) Estate to immediately clean up the leaked lubricant on the ground and dispose it according to Scheduled Waste disposal requirement. 3) Trays are placed under all tractors under repair to contain any leakage. 		
Root Cause Analysis:	<ol style="list-style-type: none"> 1) There was no follow-up plan in place to evaluate the understanding of the worker on the requirements to mitigate leakage from tractors after briefing has been conducted. <p>Ineffective supervision/workplace inspection by Management to ensure that awareness and implementation of pollution prevention measures for tractors under repair are in place at workshop area.</p>		
Corrective Actions:	<ol style="list-style-type: none"> 1) All related workers, mandores and staff working at the workshop area will be briefed on their responsibility to ensure that no recurrence of lubricants or any other oils spillage. 2) Management will put in place the follow up plan to evaluate and ensure workers understanding in mitigating leakage of lubricant if any, and to conduct random spot check monthly at workshop area to ensure all pollution prevention measures are in place. 3) Enforcement of e-SIME+ System as platform for any non-conforming practices reporting for further action. 		
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1) Briefing to all related workers, mandores and staff has been conducted on 14/10/2023. Sighted evidence of training material, attendance, and photos. Sighted training evaluation has been documented for all participants. Refer 2) Random spot check has been conducted through Workplace Inspection dated 21/09/2023. Sighted evidence of checking on spillage and availability of spill kit in the checklist 3) Monitoring on schedule waste issue has been conducted. Sighted e-Sime+ System implementation dated 14/10/2023. 		

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	<p>4) Verification through interview with Foreman and Tractor driver has been conducted via Microsoft Teams found all of them had good understanding on the issue raised. They have good awareness on managing spillage from tractors.</p> <p>5) Verification through Video Call at Tractor Parking Bay with Assistant Manager found all tractors parked day were equipped with Oil tray to ensure there is no contamination to the soil.</p> <p>6) Interview with estate management confirmed that correction and corrective action has been implemented.</p> <p>Based on the above evidence, the major non-Conformity is closed effectively on 26/10/2023. Continuous implementation will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Based on site verification at the tractors parking bay at the sampled estates, it was observed that oil trays have been placed underneath all the parked tractors. There was no trace of oil leakage nor spill seen. Interview with the tractor operators also confirmed that they are aware of the environmental risk and the necessary mitigation measures. As there is no recurrence of non-conformity, therefore the Critical NC remains closed.</p>

Previous Audit Minor Non-conformity			
NCR Ref #	2388152-202309-N1	Issued Date	07/09/2023
Due Date	Next assessment visit	Closure Date	10/10/2024
Indicator & Category (Critical / Minor)	3.3.2 – Minor		
Statement of Nonconformity:	Procedures for waste management and chemical handling was not consistently implemented.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>1) During site visit at SW Store, Sapong Estate, it was found that SW Items Old Batteries which generated 01/06/2023 was wrongly labelled with SW409 instead of SW102 as per procedure Section 2.0 SW102/ 103 for Batteries. It was not in line with Waste Management Procedures for Upstream Malaysia with reference number SD/SDP/GSD/HSE/0522/01 dated May 2022.</p> <p>During the visit to the Spraying Operation at Sapong Estate, it was identified that the tractor used to transport workers had extensive leakage of hydraulic oil at the engine. The worker had brought hydraulic oil, placed in a white container with no label, for the purpose of topping up due to the leakage. It was not in line with Chemical Handling Procedure with document reference number UM/HSE/OCP/04 dated 09/03/2021 section 6.5.1 and OSH (USECHH) Regulations 2000, Part VI Labelling & Relabelling; 21, (1) An employer shall ensure that all chemicals hazardous to health supplied or purchased by him and used in the place of work are labelled and that the labels are not removed, defaced, modified or altered. (2) When the labels mentioned in sub regulation (1) are removed, defaced, modified or altered while the chemical hazardous to health is being used at the place of work, the employer shall re-label the chemical.</p>		
Corrections:	<p>1) To immediately replace the old batteries labelling from SW409 to SW102.</p> <p>2) Management to take the immediate actions to train/source for Competent Person for the Estate.</p> <p>3) In the absence of Competent Person, a trained PIC is assigned to undertake the</p>		

	<p>workplace inspection at the Scheduled Waste Store to ensure that the Scheduled Waste Management labelling/handling is in place in accordance to the procedures.</p> <ol style="list-style-type: none"> 4) All containers with no label are immediately identified and re-labelled with the correct information. 5) To immediately conduct briefing to all tractor drivers on Chemical Handling Procedure and to ensure that all secondary containers are equipped with proper labelling.
Root Cause Analysis:	<ol style="list-style-type: none"> 1) Lapses in ensuring Competent Person availability (after the transfer of the Competent Persons to other estates) including to conduct effective workplace inspection to ensure that the Scheduled Waste Management labelling/handling is in place in accordance to the procedures. 2) No follow up evaluation plan to workers after briefing to ensure workers fully understand chemical labelling on secondary storage/container and subsequently stored hydraulic oil in a container without proper labelling. 3) Lapses in enforcement and monitoring of any non-compliant practices on scheduled waste and chemical handling.
Corrective Actions:	<ol style="list-style-type: none"> 1) To conduct refresher briefing to the store attendant on the requirement of scheduled waste storage and handling. 2) To put in place a proper human resource plan for Competent persons to ensure that relevant Competent Persons (e.g. CEP SWAM etc) is always made available for the estate. 3) Enforcement of e-SIME+ System as platform for any non-conforming practices reporting for further action 4) To conduct scheduled refresher training on chemical safety management as well as SDS requirement with the guidance from RSQM to the staff in charge, mandore and all related workers (related work with chemical/lubricant/oil) with proper training evaluation conducted including periodic evaluation plan put in place, to ensure adequate understanding on the subject matter. 5) Enforcement of e-SIME+ System as platform for any non-conforming practices reporting for further action.
Assessment Conclusion:	<p>Verification has been made during the assessment and found the following evidence:</p> <ol style="list-style-type: none"> 1. Refresher training on chemical management was conducted, covering topics such as Safety Data Sheets (SDS) and proper handling of all chemicals in the estate, including herbicides, lubricants, and diesel storage. Records of the training, conducted by personnel from Region HSE, including photos, training materials, and attendance lists, were made available for verification. The training sessions were as follows: <ul style="list-style-type: none"> • Scheduled Waste Management and Chemical Handling Training that was conducted on 14/10/2023 at Sapong Estate • Scheduled Waste and Chemical Handling Training that was conducted on 06/03/2024 at Melalap Estate • Chemical Handling Training that was conducted on 07/03/2024 at Melalap POM <p>Training evaluation forms were provided to the participants to ensure their understanding of the material. Interviews with the workers involved in handling chemicals indicate that they attended the training and received evaluation forms upon completion. They also demonstrated their understanding of chemical handling, particularly regarding the labelling of chemical containers when using alternative containers.</p>

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	<p>2. The e-Sime + System was found to be updated as of the date of the audit, listing both safe and unsafe conditions in the workplace, including any non-conformance practices against procedures. Interviews with the sampled mandore and workers during the audit indicated their understanding of the purpose of the e-Sime + System.</p> <p>3. During the site visit to the estate and mill, it was observed that there were no containers containing chemicals without proper labelling, and the sampled activities visited were conducted in accordance with the company's procedures.</p> <p>Based on the above, it was found that the implementation correlates with the corrective actions, and no re-occurrence of non-conformance findings was observed during this assessment. Hence, this minor non-conformity is closed.</p>
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Previous Audit Minor Non-conformity			
NCR Ref #	2388152-202309-N2	Issued Date	07/09/2023
Due Date	Next assessment visit	Closure Date	10/10/2024
Indicator & Category (Critical / Minor)	6.7.2 – Minor		
Statement of Nonconformity:	There were lapses in the monitoring of the first aid boxes at Sapong Estate.		
Requirement Reference:	Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites.		
Objective Evidence:	Verified the First Aid Box at the Estate Chemical Store and Schedule Waste Store Sapong Estate to have expired items. The first aid box had triangular bandage that expired on 05/2019 and 03/2021 respectively. Further verification on the First Aid Box monitoring for the Chemical Store was done on 15/08/2023 stating that all items were checked.		
Corrections:	All the expired triangular bandages in the first aid boxes are immediately replaced with new sets.		
Root Cause Analysis:	Lack of monitoring by Estate management in ensuring that expiry of all items in the First Aid Box including items that are not fast consumables/rarely used are tracked of the expiry dates and replaced on time.		
Corrective Actions:	<ol style="list-style-type: none"> 1) MA to establish a tracking list for each first aid boxes which include the expiry dates of all items including for triangular bandages and to put in place a monitoring to trigger replacement of the items before expiration dates. 2) Monthly first aid box checklist to be improved by including the monitoring of expiry date for all items including triangular bandage. 3) Estate management to include an agenda on the monitoring of First Aid Boxes (including expiry dates of items contained in First Aid Boxes) during OSH Meeting. 4) Enforcement of e-SIME+ System as platform for any non-conforming practices reporting for further action. 		
Assessment Conclusion:	<p>Melalap Oil Mill has made efforts to address this non-conformity. Verification conducted during the audit found the following evidence:</p> <ol style="list-style-type: none"> 1. Each operating unit under Melalap Oil Mill has established a dedicated checklist entitled "Healthcare Centre First Aid Inspection," which includes information on 		

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	<p>item descriptions, quantities, expiry dates, availability, and replacements. First aid inspections are conducted monthly. However, during interviews with the Medical Assistant and those in charge of first aid at each operational gang, it was confirmed that some of them take the initiative to send the first aid kits for inspection by the Medical Assistant every two weeks. All items in the first aid kits are listed on the inspection form and complete with expiry date information for items that have an expiry date.</p> <p>2. Further verification during the field visit found that all first aid kits were equipped with approved contents, and no expired items. Every item with an expiry date was labelled accordingly. The mandore responsible for bringing the first aid kit to field operations demonstrated their understanding of the key items that need to be checked in the first aid kit. This has been verified through interview during field visit.</p> <p>3. Review of the minutes from the OSH Committee meeting indicates that one of the agenda items was a briefing and discussion on the first aid status at each workstation and operation.</p> <p>4. The e-Sime + System was found to be updated as of the audit date, listing both safe and unsafe conditions in the workplace, as well as any non-conformance practices against procedures. Interviews with sampled mandore and workers during the audit indicated their understanding of the purpose of the e-Sime + System.</p> <p>Following the above, no recurrence of non-conformities was found during this assessment, and this minor non-conformity is satisfactorily closed.</p>
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Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: N/A</p> <p>Verification / Follow-up actions: N/A</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1834696-201906-M1	Critical	6.1.1	11/10/2019	Closed on 09/01/2020
1834696-201906-M2	Critical	6.5.1	11/10/2019	Closed on 09/01/2020
1834696-201906-M3	Critical	2.1.3	11/10/2019	Closed on 09/01/2020
1834696-201906-N1	Minor	4.7.3	11/10/2019	Close on 08/10/2021
1834696-201906-N2	Minor	4.7.5	11/10/2019	Close on 08/10/2021
1834696-201906-N3	Minor	4.7.5	11/10/2019	Close on 08/10/2021
1834696-201906-N4	Minor	5.3.3	11/10/2019	Close on 08/10/2021

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2111486-202110-N1	Minor	2.2.2	08/10/2021	Escalated to Major
2252028-202209-M1	Critical	2.2.2	22/09/2022	Close on 30/11/2022
2252028-202209-M2	Critical	3.6.1	22/09/2022	Close on 30/11/2022
2252028-202209-N1	Minor	2.1.2	22/09/2022	Close on 07/09/2023
2252028-202209-N2	Minor	2.1.3	22/09/2022	Close on 07/09/2023
2388152-202309-M1	Critical	7.10.3	07/09/2023	Close on 26/10/2023
2388152-202309-N1	Minor	3.3.2	07/09/2023	Closed on 10/10/2024
2388152-202309-N2	Minor	6.7.2	07/09/2023	Closed on 10/10/2024
2554005-202410-M1	Critical	3.3.2	10/10/2024	Closed on 04/12/2024

3.4 Stakeholders and previous landowner / user consultation

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

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Government agencies	Mr Huzairi Ahmad- Jabatan Tenaga Kerja Keningau.	Phone call
Government agencies	Ms Barbara S. Gohol- Head Master SK Pulong	Face to face
Contractor	Mr Jxxxx- Sxxx Exxxxxxxxx	Face to face
FFB supplier	Mr Mxxxx Mxxxxxxxxx - Lxxxxx Pxxxx	Face to face
Local communities	Mr Balukan Basinau- Kampung Mansasoh	Face to face
Local communities	Mr Kolong Sakun- Kampung Sungai Api	Face to face
Union	Ms Laisah binti Yambo- SPIEU	Face to face

Internal	Gender committee	Face to face
Internal	Local and foreign workers	Face to face

Stakeholders comment	
1	<p>Feedbacks: Jabatan Tenaga Kerja Keningau.</p> <p>There are no issues has been highlighted by Jabatan Tenaga Kerja Keningau (JTK) for all operating units under Melalap POM related to labour. The management for each operating units maintained good relationship with JTK and provided all information required upon request. JTK haven't received any complaint from the workers working at Melalap POM and supply bases.</p> <p>Audit Team verification and response: No further verification required.</p>
2	<p>Feedbacks: Ms Barbara S. Gohol - Head Master SK Pulong</p> <p>The representatives informed that the management from the estates and mill are very attentive and supportive. The management will assist whenever they requested for any assistance from the management. They have good relationship with the management. They also informed that no child labour was sighted in the estates. The management consistently contributes to school activities such as providing routes and facilities within the estate area for sports events. The teachers mentions that the estates operations do not disrupt learning or activity in the school</p> <p>Audit Team verification and response: No further verification required.</p>
3	<p>Feedbacks: Mr Jxxxx- Sxxx Exxxxxxxxx</p> <p>The contractor has a good relationship with the company where they have been providing the service for many years. The contractor also mentioned that the award of contract was done through fair and unbiased tendering process. Payments were always made on timely manner. The management and staff of the operating units have also been very accommodating should there be any issues of concern. The operating units also actively provide trainings on RSPO especially with regards to legal, OHS, best practices and employees' welfare. Although a few challenges were faced in implementing the requirements due to limited knowledge and resources, the contractors have stated that they will do their best to comply. They informed that they do not employ any child labour.</p> <p>The company has also always invited the contractor's representative to attend the stakeholder meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any. No issue with the management at this moment.</p> <p>Audit Team verification and response: No further verification required.</p>
4	<p>Feedbacks: Mr Mxxxx Mxxxxxxxx - Lxxxx Pxxxx</p> <p>Audit Team verification and response: No further verification required.</p>
5	<p>Feedbacks: Mr Balukan Basinau- Kampung Mansasoh/ Mr Kolong Sakun- Kampung Sungai Api</p> <p>Good cooperation given by estate management team. The management will help whenever they requested for help. Estate under SD Guthrie Berhad is known for offering job opportunity to the villager. No land encroachment from SD Guthrie Berhad estates. Demarcation of boundaries by the trenches, fencing and boundary stone were available. Estate provides access to the villagers using their roads for emergency cases.</p> <p>Audit Team verification and response: No further verification required.</p>
6	<p>Feedbacks: Ms Laisah binti Yambo - SPIEU</p> <p>They informed that there are no outstanding issues with the estate and mill management. Regular meetings between the management and Union are conducted to address any matter arising from the workers.</p>

	<p>Worker's welfare including housing, salary payment and benefit are well taken care of by the estate and mill management. They also informed that the management did not involve in the selection of representatives. All representatives are elected by workers. Management provides a place for election process. SPIEU will issue appointment letter to the union representatives and copy to management as for information.</p>
	Audit Team verification and response: No further verification required.
7	<p>Feedbacks: Gender committee</p> <p>They informed that no sexual harassment and violence cases reported since the last audit. Female workers understand the function of Gender Committee and aware the complaint mechanism if there are any issues occurred. They were treated equally without any discrimination by the management. The committee is tasked with planning annual activities for female workers to ensure a conducive living environment in the estate and during these activities they also can also know each other better, making easier to share any problems or thoughts. The management has also been very supportive with the programs in term of financial, facilities and other resources. They were also informed that they are treated equally and given same opportunity as the male such as promotion as mandore in the estate.</p> <p>They were briefed on the new mother's requirements for specific needs and consultation have been conducted by the management. They informed that those who handle chemical found pregnant will be transferred to other job stations that do not hazard to the worker. They allow to go back for breastfeeding during working hour in case they need</p>
	Audit Team verification and response: No further verification required.
8	<p>Feedbacks: Local and foreign workers</p> <p>Employment contract and payslip were provided, and the salaries deposited into workers bank account. Wages are paid according to Minimum Wages Order 2022. PPE is provided at no cost and can be replaced by making a request to the estate management. Foreign workers retain possession of their passports. Workers are aware of the complaint and grievance channels available to them. The management has been very accommodative to the workers in term of welfare. With regards to welfare, housing facilities, water & electricity supply were always maintained in good conditions. With the use of OPP application in smartphone, the reporting of housing defects or maintenance was very convenient. There has been no issue with regards to delivering the terms & conditions stipulated in the employment contract. Regular training on company's SOP, policies, safety and health, environmental and social aspects were conducted by operating unit. All issues has been resolved and they also channel their complaints to the workers representatives in Social Dialogue.</p>
	Audit Team verification and response: No further verification required.

List of land owner / user contacted

Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Based on comprehensive desktop studies, documentation reviews, and records reviews, there is no evidence of land ownership by other users or any customary rights associated with the land currently under oil palm operations. The Unit of Certification is in its third generation of planting, with the current landowner holding the property for over 25 years. A review of the complaint and grievance records during audits confirms that there have been no issues related to land conflict involving this Unit of Certification. Furthermore, interview records from previous and current assessments, including those with local communities, as maintained by BSI MY, indicate that there are no ongoing or historical conflicts related to the land in question.					

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As a precaution, the CB maintains a mechanism to identify and consult any interested parties should any claims or rights be identified in the future. This includes keeping track of all consultations conducted during the certification cycle to ensure comprehensive coverage.

Previous land owner / user comment	
N/A	Feedbacks: Not applicable as the estates have undergone 2nd cycle of replanting.
	Audit Team verification and response: Not applicable as the estates have undergone 2nd cycle of replanting.

3.5 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.

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The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Melalap Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Melalap Oil Mill is remain certified.	
Report prepared by	Acceptance of Assessment Conclusion
Name: Valence Shem	Name: Shylaja Devi Vasudevan Nair
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: SD Guthrie Berhad
Title: Lead Auditor	Title: Head, Sustainability Compliance Unit
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 11/12/2024	Date: 16/12/2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	<p>There is evidence that all documents that has been specified in the RSPO P&C has been made available to public. It has been verified based on the management systems that has been established through procedure which each operating units need to respond of any information request received. Each operating units need to verify and justify each request base on types of concerns. Process of request has been stipulated in the Standard Operating Manual (SOM) Subsection 5.5; Procedure for External Communication (Issuance Date 01/04/2008). Other than that, policy of the company has been made available in the SD Guthrie Bhd's website.</p> <p>Nonetheless, the completeness of the GPS maps of Melalap and Sapong estates can be further improved. As of now, the maps provided to the CB do not tally with the total certified area stated in the RSPO Certificate. The total certified area of both estates is 5,637.64 ha. However, some areas were not included in the maps which made the total area plotted on the maps are lesser than the certified area. (OFI)</p>	OFI
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	All the document/information has been established in both Bahasa Malaysia and English. As per conversation with the management, if there is any request from the stakeholder who need explanation, the management of each operating unit is responsible to explain the information to the stakeholders.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	There is no information request has been received for all operating units and has been verified based on the records and interview with stakeholders where	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		there is only request for assistance recorded. As per interview, any information request will be recorded in the logbook.	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>The consultation and communication procedure are documented in the Standard Operating Manual (SOM), specifically outlined in Subsection 5.5, Management Responsibility, and further detailed in Appendix 5.5.3.2, Procedure for External Communication.</p> <p>For external stakeholders, the communication of the policy has been conducted through stakeholders' consultations. These consultations were attended by various stakeholders representing all operating units under Melalap Oil Mill on 07/08/2024. Onsite interview with sampled stakeholders feedback can be referred in Section 3.4 of this report.</p> <p>Additionally, policy dissemination has been ensured to all workers through regular workers' meetings and assembly sessions.</p> <p>Furthermore, as part of the UoC commitment to addressing social issues, an Assistant Manager from each operating unit has been appointed as the Official Officer Responsible for Social Issues.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>List of stakeholders has been maintained and will be updated on annual basis or if there is any amendment of the stakeholders. Sighted information for the stakeholders has been maintained such as address and contact number.</p> <p>Both the estates and the mill continued to maintain the stakeholder's information (name, address, contact number, contact number, email) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, local communities, CPO/PK customers, etc. Latest update was done in year 2024 for each operating unit.</p>	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			

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Criterion / Indicator		Assessment Findings	Compliance
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad established Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The code established in Bahasa Malaysia and English.</p> <p>SD Guthrie Berhad Group Sustainability & Quality Policy Statement (previously known as SDPB's Group Sustainability & Quality Policy Statement) signed by Group Managing Director on 02/12/2019 also includes the clause "promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC)".</p> <p>Tendering process has been established where tendering process will be initiated by operating units and will be approved by regional office. Once approve, the document will be forwarded to tendering committee and selection. There are some cases that direct awarded will be done due to certain circumstances such as insufficient supplier submitted quotation and others. Sample has been taken for the tendering process and compliance with the policy that has been established.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad established Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The code established in Bahasa Malaysia and English.</p> <p>SDPB's Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 also includes the clause "promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC)".</p> <p>Tendering process has been established where tendering process will be initiated by operating units and will be approved by regional office. Once approve, the document will be forwarded to tendering committee and</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		selection. There are some cases that direct awarded will be done due to certain circumstances such as insufficient supplier submitted quotation and others. Sample has been taken for the tendering process and compliance with the policy that has been established.	
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<p>Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Among the evidence of compliance verified were:</p> <p><u>Melalap POM:</u></p> <ul style="list-style-type: none"> - Trading license #TNM/2018/3935, valid until 31/12/2024 - DOE License #003562, valid until 30/06/2025 - BOMBA fire certificate, #JBPM: SB/7/58/2024, valid until 22/04/2025 - MPOB License, #535146004000, valid until 31/12/2024, approved to process 96,000 mt FFB/year - Certificate of Fitness (Boiler) #SB-PMD-2868, valid until 13/08/2025 - Certificate of Fitness (thermal deaerator) #SB-PMT-6253, valid until 13/08/2025 - Certificate of Fitness (back pressure vessel) #SB-PMT-6247, valid until 13/08/2025 - Certificate of Fitness (air receiver) #SB-PMT-14946, valid until 13/08/2025 <p><u>Sapong Estate:</u></p> <ul style="list-style-type: none"> - MPOB License, #532297002000, valid until 31/08/2025 - MPOB License for nursery, #616164011000, valid until 31/08/2025 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Permit to store diesel, #B.PGK.SB(KGU)27/07(PBKB), valid until 10/06/2025 - CF air compressor, #PMT-SB/23 65367, valid until 16/10/2024 - Permit to deduct workers wage #JTKSBH/PMT/113/2024/0075, valid until 31/03/2026 - Permit to hire foreign workers #JTK.H.TNM;600-4/1/92112/63, valid until 10/06/2025 <p><u>Melalap Estate:</u></p> <ul style="list-style-type: none"> - MPOB License, #531977002000, valid until 31/08/2025 - Permit to store diesel, #P: S 000266, valid until 02/10/2024 – new license is still pending for approval - CF air compressor, #SB-PMT-597, valid until 24/10/2025 - Permit to deduct workers wage #JTKSBH/PMT/113/2023/0077, valid until 31/08/2025 - Permit to hire foreign workers #JTK.H.TNM;600-4/1/92112/577, valid until 11/03/2025 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Addressed in Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 20. The Group Sustainability Department (GSD) and the 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.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Tracking system is available to identify changes in the relevant regulations through head office, website information and the information is communicated from the Group Head Office. The sampled OUs have their list of all relevant laws and legal requirements documented in Legal and Other Requirement Register (LORR). The lists are reviewed from time to time and updated whenever necessary.	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	Based on site visit at the sampled estates, legal or authorised boundaries between neighbouring third party were clearly demarcated and visibly maintained. Among the method of demarcation used were trenches, field roads and boundary pegs. There was no oil palm planted beyond the legal boundaries observed.	Complied
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	<u>Sapong Estate</u> There are 3 contractors has been listed for Sapong Estate which are Pxxxxx Axxxx for FFB transport, Sxxxxx Exxxx for hiring machineries and Pxxxxx Kxxxxxx for construction of workers houses The list has been maintained in the contractor list. <u>Melalap POM</u> List of contracted parties has been maintained in the stakeholders list. Samples has been taken for 2 contractors which is for hiring machineries and CPO transportations.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.	Letter of appointment (LOA) sighted for all the contractors that has been appointed, other than that, all contractors Vendor Integrity Pledge and Vendor Code of Business Conduct which contained statement commitment by the contractor to comply with all applicable laws and regulations. <u>Sapong Estate</u>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	<p>Sample has been taken as per below.</p> <ol style="list-style-type: none"> 1. Pxxxxx Axxxx dated 20/03/2024 with reference SPE/RTC/xx-xxxx/xx 2. Sxxxxx Exxxx dated 01/06/2024. 3. Pxxxxx Kxxxxxx dated 29/05/2024 reference M2024/xxxx/xxxx/xxx d <p><u>Melalap POM</u></p> <p>2 samples of contract agreement has been taken and verified as per below</p> <ol style="list-style-type: none"> 1. Sxxxxx Exxxx dated 15/01/2024 reference number SSxx/Bxxxxxxxxxxxx/xxxx/Fxxxx 2. Pxxxxxxxx Dxxxxxxxx Txxxx reference number T/Sxx/Sxx/CPxx/xxxx/xx3 dated 15/02/2022 <p>Due diligence and monitoring for compliance of legal requirement has been monitored through "Checklist of contractor and vendor".</p>	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. - Minor compliance -	Stated in the Code of Business Conduct clause for the contractor disallowing child, forced and trafficked labour. Stated also in the document, that the contractors are not allowed to recruited workers below than 18 years old. COBC has been signed by all the contractors that has been sampled.	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims 	<p>Melalap POM has 2 own supply bases under Melalap Oil Mill namely Sapong Estate and Melalap Estate. All estates under SD Guthrie Berhad possessed complete information as verified during the audit as following:</p> <ul style="list-style-type: none"> • Information of GPS. • Evidence of the ownership status as per land title. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> Valid MPOB license <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> Delivery notes as supporting documents for claim. Valid MPOB license with purpose 'Menjual dan Mengalih FBB' 	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>A new announcement has been made on the RSPO website regarding updates for the interim measure for the fulfilment of indicator 2.3.2 of the 2018 RSPO Principles & Criteria whereby mentioned "In reference to the Announcement made on 14 February 2022, the Standard Standing Committee (SSC) has endorsed the extension of the interim measure for the fulfilment of Indicator 2.3.2 of the 2018 P&C until the revised Principles and Criteria (P&C) is adopted by RSPO Members at the General Assembly in the year 2024. This indicator relates to the data collection required to demonstrate the legality and locality of all indirect FFB suppliers to the mill. The extension of the interim measure is only applicable to cases that have been registered within the deadline stipulated in the previous announcement. New registrations of cases after the deadline will not be accepted." The announcement can be access through the link below:</p> <p>Updates: Interim Measure for the Fulfilment of Indicator 2.3.2 of the 2018 RSPO Principles and Criteria - Indirect FFB Suppliers - Roundtable on Sustainable Palm Oil (RSPO)</p> <p>Previously, following the 1st RSPO Announcement dated 14 February 2022 in Interim Measure for Fulfilment of Indicator 2.3.2, SD Guthrie Berhad has submitted the indicator 2.3.2 Case Register to RSPO Secretariat as evident in email communication dated 11/11/2022. Acknowledgement from RSPO Secretariat was received on 24/11/2022. SD Guthrie aimed to fulfil the requirement of this indicator by November 2023.</p> <p>Reflecting to the above, SD Guthrie Berhad has taken steps in objective to comply with 2.3.1 and 2.3.2 of this requirement by developed Standard Operating Procedures (SOP) entitled Responsible Sourcing Guideline for FFB Traceability (Doc. No.: SD/SDP/GS/001, date: June 2020). This SOP is a guideline to trace and record the indirect FFB supplier. As mentioned in section</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>3.1 and 3.3 of the SOP, the mandatory requirements to be followed by third party FFB suppliers are:</p> <ul style="list-style-type: none"> i) Valid MPOB license ii) Oil palm farm is legally owned to demonstrate legal entitlement to the land ownership. Evidence may include grant/land title. iii) Geolocation of the third party FFB suppliers <p>Several indirectly sourced FFB for Melalap POM were recorded in the Trace to Plantation (TTP) Master list system and file. Information on locations with GPS coordinate, MPOB license no., MPOB license validity and land title no. was kept in the system. In the system and file also recorded the palm oil local scheme certificate i.e.: Malaysian Sustainable Palm Oil (MSPO) such as MSPO certificate no. and validity of certificate for each FFB supplier. The list was updated on July 2024 by Supply Chain Executive from HQ. The executive gathers information on indirectly sourced FFB from all POM under SD Guthrie Berhad and proceed to input this data into the TTP system and file. The supporting documents for FFB despatch to Melalap POM were demonstrated by the delivery note from indirect FFB supplier, for example:</p> <ul style="list-style-type: none"> - Wxxx Mxxxxxxxxx Exxxxxxxxx; Ticket No.: 001315 - Axxx Sxxxx Cxxxxx; Ticket No.: 027924 - Lxxxx Pxxx Sxx Bxx; Delivery Order No.: 008 and 002 - Jxxxx Sxxxx; FFB Despatch Chit No.: 31236 	
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	The business or management plans for the estates and mill were presented in the form of annual budget (MPLAN) with 4 years projection (2025 – 2028). The annual budget contains the crop projection and the finance allocation for field & mill operation and administrations. The management has their monthly	Complied

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Criterion / Indicator		Assessment Findings					Compliance																							
	- Critical (Major) compliance -	progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.																												
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	The estates have prepared the replanting programme with minimum of 5 years projection. The review of the programme is done at the end of every year. Below are the details of the programme: <table><tr><td rowspan="2">Estate</td><td colspan="5">Ha</td></tr><tr><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Sapong</td><td>162.60</td><td>176.76</td><td>334.70</td><td>366.93</td><td>233.58</td></tr><tr><td>Melalap</td><td>168.51</td><td>241.86</td><td>239.16</td><td>220.07</td><td>0</td></tr></table>					Estate	Ha					2024	2025	2026	2027	2028	Sapong	162.60	176.76	334.70	366.93	233.58	Melalap	168.51	241.86	239.16	220.07	0	Complied
Estate	Ha																													
	2024	2025	2026	2027	2028																									
Sapong	162.60	176.76	334.70	366.93	233.58																									
Melalap	168.51	241.86	239.16	220.07	0																									
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	Management review meeting for the operating units were last conducted on 25/09/2024 (Sapong and Melalap Estate) and 28/08/2024 (Melalap POM). The meetings were chaired by the respective managers of the operating units and attended by the key personnel. Based on the minutes of meeting for both estate and mill, among the agenda discussed were: <ul style="list-style-type: none">• Matters arising from previous meeting• Changes in regulations, standards, policies & procedures in relation to sustainability management system• Review on operation performance & product conformity• Review on management plans• Results from system audits & assessments• Stakeholder feedback and complaints• Resources for system implementation• Continual improvement plan					Complied																							

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Conclusion/meeting outputs 	
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	Continuous improvement has been established by the management which include both environment and social aspect. It has been verified based on the document provided. Details as per below: <ol style="list-style-type: none"> 1. Construction of new housing quarters replacing all the wooden houses. 2. Providing rice to all workers every 2 months 3. Providing free education to all kids for foreign workers by establishing HUMANA 4. Providing extra water storage to all houses 5. Optimising fossil fuel consumption 6. Reduction in water consumption 	Complied
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template]. - Minor Compliance -	The Certification Unit has filled their RSPO metrics template version 2.1. Based on verification through various documents such as land titles, JKPP report, employees register, computer software recording system, to name a few, the data reported in the metrics template were found to be accurate.	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -	Melalap Oil Mill management unit has adopted the documents established by SD Guthrie Berhad, including the following: <ol style="list-style-type: none"> a) Plantations / Mill Quality Management System (PQMS / MQMS) b) Agricultural Reference Manual for Oil Palm Plantings c) PQMS/MQMS Standard Operating Manual & Procedures (SOP) d) Palm Oil Mill Lab Process Control Procedure / Oil Mill Lab 	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>e) Operations & Test Method Guidelines f) Sustainable Plantation Management System (SPMS) Manual g) RSPO Supply Chain Manual h) ESH Management System Manual i) Occupational Safety and Health Manual j) Pictorial Safety Standards k) Laboratory Process Control Manual l) Security Guidelines.</p> <p>The mill processing system is documented in the Sustainability Plantation Management System MQMS/SQM/08 v 1 dated 01/11/2008 which includes the mill SOP, and Mill Quality Management Manual v.1 2008/MQMS/QMM/08. These documents provide guidelines and standards in the mill operations. The Standard Operating procedures (SOPs) described details from the</p> <ol style="list-style-type: none"> 1. reception, sterilisation, 2. threshing, pressing, 3. clarification, nut polishing station, 4. effluent, laboratory, 5. workshop, dispatches etc. <p>In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p> <p>The procedures were communicated to workers through training and infield supervision. Interview with workers showed that the information in the procedures had been effectively communicated. Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs.</p>	

Criterion / Indicator		Assessment Findings	Compliance
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Estate and mill under Melalap Oil Mill had an established mechanism to perform checking to ensure consistent implementation of procedures. Among of mechanism are as follows:</p> <p>a) Internal audit for inspect compliance on RSPO/MSPO standard requirement have been conducted by Group Sustainability Department for each operating unit as follows:</p> <ul style="list-style-type: none"> Sapong Estate: 25/07/2024 Melalap Estate: 24/07/2024 Melalap POM: 23/07/2024 <p>b) Regulatory authority visits, for example as below:</p> <ul style="list-style-type: none"> Sapong Estate: DOSH machinery inspection was conducted on 25/07/2024. Melalap Estate: DOSH machinery inspection was conducted on 28/06/2024. Melalap POM: DOSH machinery inspection and compliance visit conducted on 14/05/2024. Comments from the compliance visits indicate that ergonomic awareness training has been conducted by the mill, the chemical store is well managed, the cleanliness of the mill is satisfactory, and workers' welfare is supported by management through provisions such as drinking water, a surau, and a first aid kit. <p>c) Operational audit and inspection from Structured Estate Performance Assessment Unit (SEPA) and mill performance assessment unit as below:</p> <ul style="list-style-type: none"> Sapong Estate: Performance Monitoring Unit (PMU) visits that has been conducted on 09/09/2024. Melalap Estate: Performance Monitoring Unit (PMU) visits that has been conducted on 10/09/2024. 	Non-compliance

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Melalap POM: Structured Oil Recovery Assessment (SORA) visits that has been conducted on 21 to 30/08/2024. <p>Nonetheless, the following lapses were identified, and a Critical non-conformity was raised due to recurrence of non-conformity against the same indicator:</p> <ol style="list-style-type: none"> Based on site visit at the river buffer zones at Sapong Estate Field No. P00P1 and Melalap Estate Field No. P18B, there was no marking to show the zone boundaries made. This is not in-line with the SD Guthrie's Riparian Reserve Management Document Item 3.1.1 Map & mark the riparian reserve which reads, "The reserve boundaries should be marked out clearly on official maps and documents, and on the ground to prevent accidental disturbance, clearing or encroachment". Melalap Estate has had their EIA report for replanting of 564.58 ha approved by the EPD Sabah. However, there was no evidence to show that the Environmental Compliance Report has been conducted. This is not in line with the terms stipulated in the "Surat Akujanji" dated 23/01/2019 [ref.: JPAS/PP/TNM/600-1/11/1/207(37)], clause 5.0 (ii) which requires the ECR to be conducted six monthly. Melalap Estate has established their waste landfill at Field No. P02P1. However, there was no evidence that shows the location of the landfill has been agreed upon by the local authorities. This is not in-line with SD Guthrie's Waste Management Procedures for Upstream Malaysia 2022, clause 5.2 which reads, "Site of the landfill should be marked on operation map and agreed upon by HOU and local authorities". 	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The implementation of SOP is monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance. The estates among others maintained the following records.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>a) Work program, b) Bin cards, Harvesting Intervals, c) Monthly rainfall records, d) Pest and diseases application, e) Monthly chemical usage, f) Internal Audit Report preformed once a year. g) Department of Occupational Safety and Health (DOSH) logbook visit h) Daily and Monthly FFB production, etc.</p> <p>For mill, the monitoring records maintained among others were related to: a) Monitoring of effluent / black smoke b) Processing & produce parameters. c) Dispatches / scheduled wastes etc. d) Monitoring consistent implementation of procedures through internal audit e) Department of Occupational Safety and Health (DOSH) and Department of Environment (DOE) logbook visit.</p>	
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting or new operations has been identified for all operating units under SOU-27, Melalap POM which includes both estates, Melalap Estate and Sapong Estate. It has been verified based on sites visit, document review of area statement, and interview with workers and sample stakeholders.</p> <p>The assessment of environmental impact of its existing activities is documented in the following documents:</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE <p>Social impact assessment has been conducted in year 2015, from 19-21/05 that has been done by team lead by Madam Sabarinah Marzuki. The findings have been classified into 5 different category which are positive comment, issues, complaints, suggestions and other findings from the stakeholders. Several issues have been highlighted such as stray animal at workers quarters and understanding on employment contract.</p> <p>Addendum social impact assessment (SIA) on replanting activity sighted dated 03/01/2024 done by Mr Noordi Jikah and Mr Jason Jonik for replanting that has will be conducted in year 2024.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The environmental management plans were developed based on the results of the environment impact assessment in various forms such as pollution prevention plan, waste management plan, GHG reduction plan, and water management plan to name a few.</p> <p>Social management plan has been established and documented for year 2024 several actions has been established such as to organize stakeholders` meeting annual basis, gender committee meeting every 3 months once, and social dialogue every 2 months. Other than that, the management has plan to monitor the pay and conditions of workers and contractors` workers in compliance with legal and collective agreement requirement.</p>	Complied

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		Sighted that, the management has established action plan for social impact assessment based on the stakeholders' consultations that has been done on 07/08/2024. Issues that have been highlighted are related to request for drain maintenance and land request issues. Management plan has been established and has been classified as resolved by the management.	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -	<p>Management plan was review and updated regularly in a participatory way based on feedback and issues collected during various of meeting such as stakeholder meeting, social dialogue session, OSH meeting, trade union meeting, and complaint book. Social Impact Assessment Plan for year 2024 has been developed by each operating unit which consists of list of issues, sources of issues, action plan, status, person in charge and date of commenced. Verification during the audit found that there is evidence that all issues that has been highlighted in the social impact assessment and management plan that has been established has been implemented based on document review. It has been further confirmed through interview with sampled stakeholders that there are no repeating same issues for issues that has been highlighted in the assessment.</p> <p>Updating of the progress of plan is carried out by the relevant persons in-charge and the results of the monitoring effectiveness are reviewed in the management units operating meetings. Mitigation measures were included in the management plan related to environment such as waste management plan, water management plan, and HCV management plan.</p>	Complied
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	SD Guthrie Berhad has documented its employment procedures in two key documents, Migrant Worker Responsible Recruitment Procedure, dated 20/08/2021 and Guideline on the Recruitment of Local Workers, dated 07/12/2020. The purpose of this documents is to explain recruitment processes for both local and foreign workers including pre and post recruitment. Among	Complied

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<p>- Minor Compliance -</p>	<p>other aspects, the procedure has outlined the selection, hiring, promotion, retirement, and termination of workers.</p> <p>As specified in the Migrant Worker Responsible Recruitment Procedure, SD Guthrie Berhad conduct selection and recruitment of migrant workers directly in the respective countries of origin. The recruitment of foreign workers will be carried out by the Workforce Management Unit (WMU) and HR department. WMU is responsible for conducting a briefing to potential workers on the job and provide the following information to the potential candidates during interview session:</p> <ul style="list-style-type: none"> - Job requirements - Terms and condition of the work (e.g., wages, work hours, leave, benefit, safety, and health) - Policy - Grievance channels available <p>After the interview, workers will also be questioned about whether they have encountered any unethical practice, deceptive processes, or intimidation from any party involved.</p> <p>Section 3.2 of the procedure also mentions that where there is a requirement to use the services of recruitment agents (vendor) in the origin country, company shall enter into partnership agreements to ensure the process recruitment managed by recruitment agents is transparent and follow the rules and standard required by the company. Other part mentions in the procedure are no charging of recruitment fees, transparent terms and conditions of employment in contracts, no withholding of passports or personal documents and grievance channels. The appendix in the procedure has summarizes the process flow of migrant workers recruitment from start of the recruitment process to the end.</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>While for hiring local workers, section 4 of the Guideline on the Recruitment of Local Workers states that operating unit need to identify vacant positions in operations and request for necessary approvals to recruit new workers. Interested applicants are required to fill out an Application Form. They will be screened and shortlisted for an interview by Assistant Manager at the operating unit. During interview, the Assistant Manager is to brief the applicant the job, tasks, and expectations, in a language that they understand. List of successful applicant will be provided to the Manager for final approval for recruitment. Prior to commencing work, workers will be given an induction briefing and the briefing includes information on:</p> <ul style="list-style-type: none"> - Employment contract terms and conditions - Company policies - Housing rules - General details on operations 	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Based on interview with sampled workers and relevant stakeholder and documentation review, it was found that employment procedures as mentioned in indicator 3.5.1 were implemented and all the records are adequately maintained. Induction process is mandatory to be carried out by operating units to ensure company's rules and regulations were socialized and acknowledged by the workers.</p> <p>Induction briefing, fill out application form, medical checkup, interview session, briefing on salary, employment terms and conditions, as well as information about grievance channel were conducted as per required in the procedures established. This was confirmed during interview with sampled workers comprising both of foreign workers from different origin countries and local workers. During the audit, stakeholder consultation was conducted with several neighbouring operating unit and local community. It was noted that job vacancies, if any, would be advertised near the locations of the operating units.</p>	Complied

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		At the operating units, application forms, interview assessment form, medical check-up report, copy of identification documents and employment contract for newly recruited employees were made available for verification. These are among the pre-requisites outlined in the recruitment procedure.	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Policy for Occupational Health and Safety has been documented in the Health, Safety and Environment (HSE) Policy Statement dated 01/06/2020 and signed by Chief Executive Officer Upstream Malaysia.</p> <p>In the policy stated the company commitment to the well-being of its employee, providing safe and healthy working environment, pre-emptively preventing our employees and external parties in the operations from injury and ill health as well as operating in an environmentally responsible manner at global operating sites.</p> <p>Policy also stated the commitment to comply with statutory requirements, inculcating the culture of safety and health, improving the management of occupational safety, health related and environmental matters eliminating or minimizing any potential adverse effect on the environment arising from or business activities and to educate and encourage stakeholders in maintaining and enhancing the quality of the health, safety, and environment.</p> <p>Reflecting to the above policy, all operations were risk assessed to identify all health and safety issues by estates and mill under Melalap Oil Mill. Mitigation plans and procedures were available, documented and implemented.</p> <p>Risk assessment for HIRARC is guided by procedure entitled UM HSE Management System; OSH Risk Management Procedure; Doc Number: HSE/SP/01; Dated: 2021. Appropriate risk control measures were determined and implemented for the respective activities and operation at all visited estates and mill. HIRARC will revise once accident happen to the activities in the estates and mill.</p>	Complied

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	<p>Risk assessed carried out are as below:</p> <p><u>Sapong Estate</u></p> <ol style="list-style-type: none"> 1. HIRARC was established in the estate to assess all risks and hazards associated to all operations in the estate using latest format OSH Risk Assessment Register. Risk level divided into 3 categories: Not acceptable – risk level (15-25) Tolerable – risk level (5-12) Low – risk level (1-4) Observed during site visit to spraying, harvesting and replanting operation, found that the workers were worn PPE as per HIRARC recommendation. Revised HIRARC document dated 01/06/2024 was made available for verification. 2. Chemical Health Risk Assessment (CHRA) has been conducted on 16/08/2024. Report of the CHRA is provided for verification during the audit (report no.: HQ/15/ASS/00/364-2024/32). The assessment has been conducted by competent person with DOSH registration no.: HQ/15/ASS/00/364. Based on CHRA report, the assessment conducted at the work unit of workshop technician, sprayer operator and manuring operator. All workers were exposed to the chemical hazards have undergo medical surveillance programme as recommended in CHRA report. The latest medical surveillance was conducted on 02/09/2024, and the results are still pending receipt by the estate. Last year's medical surveillance was conducted on 27/11/2023 by Occupational Health Doctor (OHD) with DOSH registration no.: HQ/13/DOC/00/315. In the report, the next medical surveillance shall be performed by the 27/11/2024. From the report, 26 workers were undergone medical surveillance and the result medical surveillance have been acknowledged by the workers. All workers 	

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		<p>undergo medical surveillance is fit to continue their work without any abnormal results.</p> <p>In addition, site visit at chemical store, fertilizer store and chemical premix area found that the workers understand and able to demonstrate the used of appropriate PPE for conducting the work related to chemical as recommended in the CHRA report. Apart of medical surveillance, which is conducted yearly, monthly clinical checks are also carried out by the Medical Assistant to the workers exposed to the chemical hazards. Monthly health checking records (done at the clinics) were available and satisfactorily maintained. Health check includes nail, pulse, blood pressure and skin.</p> <p>3. Noise Risk Assessment (NRA) was conducted on 19-20/08/2024 by competent person with DOSH registration no.: HQ/14/PEB/00/125. From the report, it was found that the activity assessed in the assessment were grader, compactor, excavator, tractors (including grabber), grasscutter, backhoe, bulldozer and blowers. This is found in compliance to the Occupational Safety and Health (Noise Exposure) Regulations 2019.</p> <p>Site verification at field and store found that recommendation from the assessment were implemented such as fixing sticker hearing protection sticker and wearing personal hearing protector at the noise area and to conduct audiometric test annually to the workers who exposed and work at the noise area. Latest audiometric test was conducted on 02/09/2024 and the results are still pending receipt by the estate. Last year, audiometric test was conducted on 27/11/2023 resulted in out of 16 workers inspected, none were found to have abnormal audiometry results.</p> <p><u>Melalap POM</u></p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<ol style="list-style-type: none"> <li data-bbox="1010 411 1928 603">1. HIRARC was established in the mill to assess and identified risks and hazards of all operations in the mill and to provide control measures to reduce and eliminate where possible the risks. Latest HIRARC was reviewed on 15/05/2024 for workshop activity. Among the HIRARC verified were for Kernel Plant, Boiler Operation, Sterilizer Operation, FFB Ramp and Effluent Treatment Plant. <li data-bbox="1010 614 1928 1390">2. Chemical Health Risk Assessment (CHRA) has been conducted on 02 to 03/04/2024 to check the compliance to the provisions of the USECHH Regulations 2000 with respect to exposure to chemicals hazardous to health at the workplaces. Report of the CHRA is provided for verification during the audit (report no.: HQ/10/ASS/00/277-2024/10). The assessment has been conducted by competent person with DOSH registration no.: HQ/10/ASS/00/277. Based on CHRA report, the assessment conducted at the work unit of lab analyst, effluent treatment plant operator, water treatment plant operator, boiler attendant, kernel plant operator, maintenance fitter and storekeeper. No chemical exposure monitoring is recommended to be conducted at laboratory as the previous results showed monitored parameters were below Action Level (AL) and Permissible Exposure Limit (PEL). The mill has used chemical analytical machine i.e., NIRS DA1650 which found by the assessor showed the significantly reduce the usage of chemical in laboratory especially hexane. Among recommendation in the CHRA report is to conducted medical surveillance and biological monitoring to the workers exposed to chemical hazards such as manganese and N-Hexane. Medical surveillance and biological monitoring were conducted on 15/05/2024 by Occupational Health Doctor (OHD) with DOSH registration no.: HQ/08/DOC/00/695 and the result was received on 16/07/2024. Based on the results of medical surveillance, 39 of the workers who exposed to chemical exposure consists of manganese and hexane are fit to work and no medical removal protection is recommended. The result has been acknowledged by the 	

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		<p>workers as confirmed during the interview with the sampled workers who exposed to the chemical.</p> <p>3. Noise Risk Assessment (NRA) was conducted on 20/08/2024 by competent person with DOSH registration no.: HQ/14/PEB/00/125. The report was received by the management on 06/09/2024. The NRA report was available for verification. All work unit that exposed to the noise exposure were assessed such as grading, steriliser's, threshers, press, oil room, kernel plant, engine room, boiler, water treatment plant, store, workshop, lab, effluent treatment plant and store.</p> <p>Site visit at the mill workstation found that recommendation from the NRA were implemented such as fixing signage hearing protection zone at the noise area and ear plug and earmuff were used as personal hearing protection (PHP) by workers at high pitch area. In addition, there is an Audiometric test was conducted on 15/05/2024 to all workers stationed at high pitch area such as oil extraction station, kernel plant, press station, boiler plant, engine room and water treatment. The report was received in June 2024. In the latest audiometric test, out of 79 workers inspected, only one of them declared as having abnormal results i.e., temporary/permanent standard threshold shift. The OHD recommends these workers to undergo retest in 3 months from the date receipt the report. One workers were sent to undergo retest audiometric on 18/07/2024 at Oxxxxxx Hxxxxxx Sxxxxxxxxx and the OHD recommended this workers to be continue undergo annually audiometric test.</p> <p><u>Melalap Estate</u></p> <p>1. HIRARC was assessed and documented by the estate management. There was risk identified as significant and control measures determined to mitigate the risks. Sampled HIRARC of spraying, transporting of FFB and harvesting were verified and found it satisfactorily assessed and</p>	

Criterion / Indicator		Assessment Findings	Compliance
		<p>mitigation measured identified are effectively implemented by the management as observed during site visit. Latest HIRARC activities are reviewed on 18/09/2024 for frond stacking activities.</p> <p>2. Chemical Health Risk Assessment (CHRA) was conducted on 16/08/2024. Report of the CHRA (report no.: HQ/15/ASS/00/364-2024/30) is provided for verification during the audit. Work of unit identified to be assessed consists of spraying and mixing operation, manuring operation and workshop operation.</p> <p>Among recommendation in the CHRA report is to undergo medical surveillance, wear appropriate PPE, bring first aid and clean water to the workers exposed to chemical hazards. Latest medical surveillance was conducted on 02/09/2024, however the result is yet to receive. Last year's medical surveillance was conducted on 27/11/2023 by the Occupational Health Doctor (OHD) with DOSH registration no.: HQ/13/DOC/00/315. 17 workers were undergone medical surveillance is fit to continue their work without any abnormal results. In the report states that the next medical surveillance shall be performed by the 27/11/2024.</p> <p>3. Noise Risk Assessment (NRA) was conducted on 17/08/2024 by competent person with DOSH registration no.: HQ/14/PEB/00/125. It was found that the activity assessed in the assessment were grasscutter, water treatment plant, blowers, transportation (including lorries and tractor), workshop, carpenter and backhoe. Based on recommendation in the NRA report, latest audiometric test was conducted 02/09/2024, however the results have not yet been received by the estate. Audiometric test for the last year was conducted on 27/11/2023 by Occupational Health Doctor (OHD) with registration no.: HQ/13/DOC/00/315). Total number of 12 workers had undergone the test and all of them have normal hearing.</p>	

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3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Estate and mill were monitored the effectiveness of safety and health plan to the workers by established Environment, Safety & Health Programme for the year 2024 which listing assessment, recommendation from assessment, briefing and meeting to be conducted for year 2024. The plan had been reviewed annually, updated by the estate and mill, and approved by respective manager for estate and mill.</p> <p>OSH Policy found to be clearly displayed at mill and in the estate's office. Interview with sampled workers demonstrated awareness towards occupational safety and health.</p> <p>Referring to Environment, Safety & Health Programme for the year 2024 that has been prepared by certification units. Among the safety and health plan discussed were:</p> <ol style="list-style-type: none"> 1. ESH Risk Management 2. ESH Structure 3. Incident Reporting 4. Emergency Preparedness & Response 5. Chemical Safety Management 6. Contractor Safety Management 7. Vehicle & Machinery safety Management 8. Communication 9. Inspection 10. Health and Hygiene Monitoring program 11. Awareness, competency & Training 12. Reporting <p>Reflecting on the above, programmes for workers health and safety were satisfactorily implemented. Estates and mill have established training plan for</p>	Complied

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	<p>year 2024 as mentioned in indicator 3.7.1 to ensure that safety and health plan is implemented. Quarterly workplace inspection conducted by OSH Committee to address the identified health and safety risks is a one mechanism of monitoring the safety and health plan implementation. In addition, the safety performance of estate and mill is monitored through the internal audit conducted by the Group Sustainability Department. Latest internal audit was conducted in each operating unit as below:</p> <ul style="list-style-type: none"> • Sapong Estate: 25/07/2024 • Melalap Estate: 24/07/2024 • Melalap POM: 23/07/2024 <p>Rapid 4 system is also used for monitoring accident cases occurred in the estate and mill. As mentioned in indicator 3.6.1, medical surveillance and audiometric test programme was conducted by the estate and mill annually as recommended in the CHRA and NRA report. To report unsafe act/condition in the workplace, e-Sime+ System is used as a mechanism for monitoring. For all operating unit visited, it was found the system is reported and updated as to date of audit. The system tabulates the time of reporting, classification of issue, reprimanded, issue details, action taken and status of the issue. Moreover, supervising safety of the workers is part of responsibility of staff, assistant manager, and manager of each operating unit. Hence, monitoring safety and health plan is done through directly involvement from management.</p> <p>OSH Committee minutes meeting (conducted quarterly) and muster call briefing was discussed the results of the above monitoring mechanism and appropriate action are taken. Moreover, workplace inspection was conducted once in every 3 months prior to OSH Committee also indicates that the monitoring for safety procedures and practice is in place.</p>	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.		

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<p>3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>A documented training programme has been developed and available for each operating unit visited. Training plan for year 2024 are listing trainings covering aspects of safety, health, environment and social which involves staff, workers, and contractors. It also found the training programme covers all aspects of the RSPO P&C requirements. Training evaluation form were provided to the workers after training session to evaluate status of their competency. Melalap POM has documented training plan in 'Training Plan FY 2024 KKS Melalap'. For Sapong and Melalap Estate, documented training plan are as below:</p> <ol style="list-style-type: none"> 3. Training Requirement for Operating Unit ESH Training Matrix 4. Good Agriculture Procedure Plan for Year 2024 5. Social Annual Training Plan for Year 2024 6. Environmental Training Plan for Year 2024 <p>Furthermore, each operating unit visited has established training needs of individual employees prior to planning and implementation of the training programme/plan with purpose to provide the specific skill and competency required to all employees based on their job description. The training analysis was conducted based on the job designation and training required by the job type. This has been verified in Training Requirement for Operating Units (Mills & Estate).</p> <p>Interview with sampled workers during field visit, found that the workers have been trained with their specific task, safety and emergency procedure and mention that the training was conducted on yearly basis. The training was sighted to include Gender Specific Training at each operating unit visited.</p> <p>Based on the documents reviewed and interview conducted, it was concluded that the training program has been effectively established.</p>	<p>Complied</p>

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3.7.2	Records of training are maintained. - Minor Compliance -	Records of trainings were maintained by the mill and all estates visited. It was observed that the records consist of all necessary information (attendance, photos, and training contents). Example of the verified records are as follows: <u>Sapong Estate</u>	Complied																										
		<table><tr><td>Name of Training</td><td>Date</td></tr><tr><td>Hearing Conservation Training</td><td>26/09/2024</td></tr><tr><td>First Aid Training</td><td>19/09/2024 and 06/03/2024</td></tr><tr><td>Harvesting Training</td><td>05/08/2024 and 23/07/2024</td></tr><tr><td>Training for Sprayer</td><td>26/07/2024 and 15/02/2024</td></tr><tr><td>HCV Training</td><td>06/06/2024</td></tr><tr><td>CHRA Briefing</td><td>16/08/2024</td></tr><tr><td>Schedule Waste Management and Chemical Handling Training</td><td>14/10/2023</td></tr><tr><td>Schedule Waste Management Refresher Training</td><td>29/11/2023</td></tr><tr><td>Grievance Channel Briefing</td><td>16/07/2024</td></tr><tr><td>Hours of working including OT Briefing</td><td>26/09/2024</td></tr><tr><td>Policies Briefing</td><td>25/09/2024</td></tr><tr><td>Tractor Training</td><td>11 & 12/09/2023</td></tr></table>		Name of Training	Date	Hearing Conservation Training	26/09/2024	First Aid Training	19/09/2024 and 06/03/2024	Harvesting Training	05/08/2024 and 23/07/2024	Training for Sprayer	26/07/2024 and 15/02/2024	HCV Training	06/06/2024	CHRA Briefing	16/08/2024	Schedule Waste Management and Chemical Handling Training	14/10/2023	Schedule Waste Management Refresher Training	29/11/2023	Grievance Channel Briefing	16/07/2024	Hours of working including OT Briefing	26/09/2024	Policies Briefing	25/09/2024	Tractor Training	11 & 12/09/2023
		Name of Training		Date																									
		Hearing Conservation Training		26/09/2024																									
		First Aid Training		19/09/2024 and 06/03/2024																									
		Harvesting Training		05/08/2024 and 23/07/2024																									
		Training for Sprayer		26/07/2024 and 15/02/2024																									
		HCV Training		06/06/2024																									
		CHRA Briefing		16/08/2024																									
		Schedule Waste Management and Chemical Handling Training		14/10/2023																									
		Schedule Waste Management Refresher Training		29/11/2023																									
		Grievance Channel Briefing		16/07/2024																									
		Hours of working including OT Briefing		26/09/2024																									
		Policies Briefing		25/09/2024																									
Tractor Training	11 & 12/09/2023																												

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		<u>Melalap POM</u>		
		Name of Training	Date	
		Company Policy Briefing	03/10/2024	
		Chemical Handling Training	07/03/2024	
		First Aid Training	11/03/2024	
		Training for Working at Height	07/03/2024	
		e-Sime + System Training	07/03/2024	
		Lab Refresher Training and Sampling Method	13/03/2024	
		Fire Drill Training	04/10/2024 and 18/12/2024	
		Contract and Vendor Briefing (Grievance Channel, Suara Kami, COBC and Whistleblowing)	03/07/2024	
		Salary Calculation, ILO and Grievance Channel Briefing	03/10/2024	
		Hearing Conservation Training	26/09/2024	
		Refresher Training for SW Labelling	08/08/2024	
		Noise Awareness Sharing	21/08/2024	
		SCCS Training	23/08/2024	
		Human Right Briefing	09/09/2024	
		Spill Tray and PPE Training	10/08/2024	
		Cleaning Storage PK/CPO Procedure	10/08/2024	

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		Emergency Response Team Briefing	23/08/2024	
		Training for Boiler Station	23/08/2024	
		<u>Melalap Estate</u>		
		Name of Training	Date	
		First Aid Training	01/10/2024 and 07/03/2024	
		Hearing Conservation Training	14/08/2024 and 27/09/2024	
		Fire Drill Training	04/10/2024	
		Chemical Handling Training	06/03/2024	
		Schedule Waste Management Training	06/03/2024	
		Training on Estate Vehicle Inspection and SOP Briefing	27/09/2024	
		Spraying Activity Training (focus on PPE)	13/06/2024	
		Chemical Mixing, Spraying Technique Refresher and Spillage Kit Training	12/07/2024	
		Policies Briefing	26/03/2024	
		Refresher Training for Sprayer	13/07/2024	
		Manuring Training	07/06/2024	
		HCV Training	23/07/2024	

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		Sexual Harassment Briefing	01/10/2024	
		Policy, Human Right Defender and Human Right Charter, Grievance Channel and Wages Calculation	24/07/2024	
		Contract and Vendor Briefing on ILO, COBC, Laws Payslip and Employment Contract	03/07/2024	
		Contractor Briefing on PPE, 10 Golden Rules, Employment Contract, Work Permit, COBC and Safe Working Procedure	27/01/2024	
		Harvesting Training	13/06/2024	
		Tractor Driver Training	30 to 31/10/2023	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -	There were two trainings on supply chain conducted since the last visit. The first one was conducted on 18/07/2024 for the third party FFB suppliers and the second one on 23/08/2024 which was attended by key personnel from various departments such as assistant managers, laboratory, weighbridge operators, admin clerks, CPO & PK transporter, and third party FFB suppliers. The training record was available for verification.		Complied
Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)				
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the	NA as the mill opted for MB model.		Complied

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	implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.		
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	The mill receives both certified and non-certified FFB. Therefore, qualifies for the Mass Balance supply chain system and module. The volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products, were verified.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report (see Table 10).	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The parent company (SD Guthrie Berhad) is the member of RSPO. Membership No.: 1-0008-04-000-00 since 07/09/2004. Palmtrace member ID: RSPO_PO1000000300 (Melalap Oil Mill).	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all</p>	Documented Procedures were made available for verification and the requirements have been adhered to as follows:	Complied

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	<p>elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<ul style="list-style-type: none"> a) Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia, Issued by Group Sustainability Department, ver. 02, dated January 2024 b) Complete and up to date records and reports in relation to RSPO SCCS were maintained and available for verification. Among the records available were Mass Balance Sheet, Internal Audit Reports, and SCCS Training records. c) Specified in Procedure section 4.0 Responsibilities; 4.1 The Head of Operating Unit shall have the overall responsibility for the implementation of SOP; 4.2 The Head of Operating Unit may assign roles to relevant personnel or invite personnel from various departments where necessary to assist in the implementation of SOP d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the Sustainable Supply chain and Traceability Procedure Section 7.0 Receiving FFB at the Mill. 	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- 	<p>The latest internal audit was conducted on 23/07/2024 by trained internal auditors sourced from the Group Sustainability Department (GSD). Based on the audit report, the supply chain elements were adequately covered. There was no non-conformity raised as a result of the audit. The results from the internal audit had been discussed by the management during their management review which was last conducted on 28/08/2024.</p>	Complied

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	conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.		
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>i) When certified FFB delivered to the mill from the estate, the transporters presented dispatch chit to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g., of information available in the estate's dispatch chit is as follows:</p> <ul style="list-style-type: none"> • FFB dispatch chit no. • Estate's name • Date & time of delivery • Field No. <p>ii) There has been no projected overproduction for the period under reviewed. Nonetheless, the mill is aware of the action to be taken should there be any.</p> <p>iii) Should there be any non-conforming FFB and/or documents it will be handled according to supply chain procedure.</p>	Complied
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <p>a) The name and address of the buyer;</p> <p>b) The name and address of the seller;</p> <p>c) The loading or shipment / delivery date;</p>	<p>The mill ensured the required information is available in document form. Based on the sampled sales/purchase contracts, all the required information by the standard was made available in several documents such as weighbridge tickets, delivery order, and commercial invoice to name a few. For the period under review, the mill has only sold certified PK physically.</p>	Complied

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	<ul style="list-style-type: none"> d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 		
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. 	<p>The mill does not outsource any of its milling activities to any third party. With regards to the contracted CPO and PK transporter, it is stated in the contract agreement between the mill and the contractor (validity: 01/01/2021 to 31/12/2024) in Annexure 5, RSPO Supply Chain Certification Standard, that the site has legal ownership of all input material to be included in outsourced processes and CB has the access to the contractor's operation should an audit is deemed necessary.</p>	Complied

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	<p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of all contractors used for the physical handling of CSPO is listed under the stakeholder list for year 2024.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No change of names and contract details of transporter for the physical handling of RSPO certified oil palm products.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p>	<p>i) The mill has maintained the accurate, complete, up-to-date, and accessible records and reports covering all aspects of this standard, which among others are:</p> <ul style="list-style-type: none"> - Mass balance accounting - FFB dispatch documents from supplying estates - Daily Production Report - PK Transportation documents - Training records - Internal audit reports <p>ii) Records are to be kept for 3 years as addressed in their Sustainable Supply Chain and Traceability Procedure.</p> <p>iii) NA as the mill opted for MC model.</p> <p>iv) Verification of the MB accounting showed that:</p>	Complied

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	iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<ul style="list-style-type: none"> a) all receipts of RSPO certified FFB and deliveries of RSPO certified PK were recorded and balanced on a three-monthly basis. b) all volumes of certified PK that were delivered were deducted from the material accounting system according to the mill's actual OER/KER c) all deliveries of certified PK were made from positive stock. 	
3.8.13	Extraction Rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	Conversion factor of CPO and PK production is depending on the actual OER and KER. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-	NA as the mill opted for MB model.	Complied

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	certified oil palm products, including during transport and storage to strive for 100% separation.		
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Shipping announcement in the RSPO PalmTrace platform is carried out by the mill when RSPO certified products are sold as certified to buyers. Based on samples, all the announcements were made within three months after the dispatch dates.</p> <p>Removal of certified volumes sold as conventional has also been made accordingly as verified in the user's PalmTrace.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	Corporate communication which highlighting its RSPO membership and/or its commitment to the objectives and principles of RSPO was seen made on the company's website.	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <p>A. display its RSPO membership status</p> <p>B. display the RSPO web address (www.rspo.org)</p> <p>C. state that the member supports the work of RSPO</p> <p>D. state the member's history with regard to RSPO</p>	Verification of the company's website showed that the parent company has highlighted their RSPO membership status, and commitment to meet the standard requirements. There was no RSPO Trademark used.	Complied

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	E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership		
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	The mill does not use the RSPO corporate logo in any of their communication tools such as company's website, letterhead, business cards, and flyers to name a few.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	The mill does not make any statement that may lead to believe that RSPO memberships by itself implies the selling of RSPO certified oil palm product.	Complied
4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." • "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." 	The mill does not make any statements that highlight their RSPO certification status and product-related claims.	Complied

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	<ul style="list-style-type: none"> • “We are RSPO certified. Ask us for our RSPO certified products.” 		
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <p>i. “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).”</p> <p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: “This reported figure is not audited through RSPO Certification”.</p>	NA as the mill is an RSPO member under its parent company, SD Guthrie Berhad.	Not Applicable
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters,	NA as no product specific communication was made.	Not Applicable

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	displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.		
5.1.2	Product-specific communications are voluntary.	NA as no product specific communication was made.	Not Applicable
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	NA as no product specific communication was made.	Not Applicable
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	NA as no product specific communication was made.	Not Applicable
5.1.5	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 	NA as no product specific communication was made.	Not Applicable
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as	NA as no product specific communication was made.	Not Applicable

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	retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain		
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	NA as no RSPO Label was used in all the off-pack claims made.	Not Applicable
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Verification on the sampled shipping documents of the certified PK sales such as sales contract, weighbridge tickets, delivery order, and commercial invoice confirmed that the supply chain model and certificate number were correctly stated.	Complied
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil 	NA as the facility is not a distributor or wholesaler.	Not Applicable

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	<p>products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation.</p> <ul style="list-style-type: none"> • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 		
5.3 On pack claims			
5.3.1	<p>Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.</p>	NA as no on-pack claim was made.	Not Applicable
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* 	NA as no on-pack claim was made.	Not Applicable

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	*Add RSPO TM Licence Number below or next to the claim.		
	B) or Mass Balance (MB) Certified Products: <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* *Add RSPO TM Licence Number below or next to the claim.	NA as no on-pack claim was made.	Not Applicable
	C) For Partially Certified Products: <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* *Add RSPO TM Licence Number below or next to the claim.	NA as no on-pack claim was made.	Not Applicable
	D) For Products covered with Book and Claim (B&C): <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* *Add RSPO TM Licence Number below or next to the claim.	NA as no on-pack claim was made.	Not Applicable
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	NA as no on-pack claim was made.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	NA as no on-pack claim was made.	Not Applicable
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	NA as no on-pack claim was made.	Not Applicable

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5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	NA as no on-pack claim was made.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	Oil palm claimed for MB certified contain of 100% CPO or PK MB-certified.	Complied
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm claimed for MB certified contain of 100% CPO or PK MB-certified.	Complied
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. • The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	No evidence of storytelling in product related communication. Thus, this requirement is not applicable.	Complied
Product-Specific Communications Labelling			
	Members are allowed to use the RSPO Label in one of the following ways:	NA as no product-specific communications labelling was made by the facility.	Not Applicable

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	<ul style="list-style-type: none"> The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 		
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad established the Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & 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. Under section 3.2.1 of HRC stated that the company's commitment on eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking, and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. Furthermore, the company is committed to provide decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs.</p> <p>Aside the above, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. SD Guthrie Berhad respect and safeguard human rights, nation of democracy and its institution. They</p>	Complied

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		<p>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 business activities and relationships including directors, employees, counterparties, business partners, workers in our operations and supply chains, and communities surrounding our operations.</p> <p>All the above policies were communicated to the employees during induction training for new employees and morning muster. While for external stakeholder, the policies were communicated during stakeholder meeting on 07/08/2024 which combined all estates and mill under Melalap Oil Mill.</p> <p>Reflecting to the above, feedback received from stakeholders' consultation conducted during the audit with sampled workers and several external stakeholders found, there is no issue raised related to the human right at each visited operating unit. During the interview with some of the workers (both local and migrant), they mentioned that they were aware of such policy and commitments by company even though they are not able to remember it word by word but is reflected in their working environment and the management always remind about it during morning muster and other training or meeting. They also provided with training and reminded during morning muster.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad prohibits any form of violence or harassment in their operation as per the above-mentioned policies. Based on interview with sampled workers and gender committee representatives, there has been no case reported with regards to violence and harassment. No harsh or insulting words are in used for giving orders to do the operation tasks, have been reported by workers. Most of the workers gave feedback that they are comfortable working at Melalap Oil Mill Should there be any such case, it can</p>	Complied

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		be addressed in accordance with the SD Guthrie Berhad's Standard Operating Procedure of Suara Kami Helpline, dated 15/04/2020.	
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Grievance procedure has been established Grievance Response Standard Operating Procedure updated on 18/07/2022 where the management of has established several methods to make any complaint such as workers representative meeting (social dialogue on monthly basis), gender committee meeting every 2 months, online platform (suara kami, whistleblowing) and also through email that will be handle by Grievance units. The procedure also classified the cases for complainer that required to maintain anonymous or not.</p> <p>The awareness on surrounding communities for complaints or suggestion have been given during "Mesyuarat Bersama Pihak Berkepentingan" included village head, school representative, OCP supplier, contractor and others. The estate management has also conducted the training for employees and stakeholders respectively.</p> <p>As per interview, both stakeholders and workers can demonstrate their understanding on the procedure that has been established.</p> <p>Stakeholders' meetings have been conducted on 07/08/2024 and has been attended by the all the stakeholders. Communication on the grievance procedure is one of the agenda and has been recorded in the minute's meetings.</p> <p>While for workers, it has been conducted during the morning muster call.</p>	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	There is evidence that the procedure has been made available and in place where their procedure has been communicated to all workers during morning mustercall on weekly basis. Other than that, it has been posted at the housing quarters, muster round and office. QR for suara kami has been pasted at the	Complied

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	- Minor compliance -	safety helmet for each worker. As per interview, workers and stakeholders can demonstrate their understanding on procedures. There is no illiterate parties has been identified for each operating units.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	All operating units under SOU-27 Melalap POM did not receive any complaint which has been verified based on Suara Kami records and Buku aduan dan Cadangan. For any cases of housing repair, it has been recorded under OPP and sighted that all the issues report has been responded with 7 days from the days received.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	SD Guthrie Berhad has implemented Grievances Response Standard Operating Procedure dated 18/07/2022 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	SD Guthrie Berhad is deeply committed to promoting sustainable development in local communities through extensive consultation and addressing social and environmental issues. The company's contributions are diverse and aimed at fostering social and environmental benefits. 1. Approval to use estate football field on 06/09/2024 to Pasukan Bola Sepak Wira SIB Sapong Tenom 2. Free rice has been provided to the workers on monthly basis	Complied

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Criterion / Indicator		Assessment Findings	Compliance																
		3. Assistance for manpower and machineries to Sekolah Kebangsaan Pulong 4. Provide space for cemetery for Kampung Mosusun local communities																	
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.																			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>There is evidence of land ownership verified for both operating units (Sapong Estate/ Melalap Estate). For Sapong Estate, there are 8 land titles which 1 has been leased from the Sabah State Government and 7 land title is leased as provisional lease with total hectarage of 3420.40 Ha. Verification has been done by auditor base on the hectarage master listing updated on 08/10/2024 registered total 3,417.27Ha. Sample of land title as per below</p> <table border="1"> <thead> <tr> <th>Land title No.</th><th>District</th><th>Hectarage</th><th>Leasing period.</th></tr> </thead> <tbody> <tr> <td>16xxxxxx</td><td>Tenom</td><td>42.94</td><td>999 years</td></tr> <tr> <td>16xxxxxx</td><td>Tenom</td><td>18.44</td><td>999 years</td></tr> <tr> <td>16xxxxxxx</td><td>Tenom</td><td>163.45</td><td>999 years</td></tr> </tbody> </table> <p>Melalap POM is located on the land of Melalap Estate under Land Title# Country Lease 165314643. A copy of the land title was kept in the mill. Melalap Estate has 6 land titles with a total area of 2,257.25 Ha.</p>	Land title No.	District	Hectarage	Leasing period.	16xxxxxx	Tenom	42.94	999 years	16xxxxxx	Tenom	18.44	999 years	16xxxxxxx	Tenom	163.45	999 years	Complied
Land title No.	District	Hectarage	Leasing period.																
16xxxxxx	Tenom	42.94	999 years																
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16xxxxxxx	Tenom	163.45	999 years																
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>As reflected earlier in indicator 4.4.1, all estates under Melalap Oil Mill have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad.</p> <p>Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.</p>	Complied																

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Criterion / Indicator		Assessment Findings	Compliance
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	As reflected earlier in indicator 4.4.1, all estates under Melalap Oil Mill have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad. Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	As reflected earlier in indicator 4.4.1, all estates under Melalap Oil Mill have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad. Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	As reflected earlier in indicator 4.4.1, all estates under Melalap Oil Mill have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad. Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	As reflected earlier in indicator 4.4.1, all estates under Melalap Oil Mill have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Critical (Major) compliance -	Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	As reflected earlier in indicator 4.4.1, all estates under Melalap Oil Mill have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad. Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	As reflected earlier in indicator 4.4.1, all estates under Melalap Oil Mill have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad. Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	As reflected earlier in indicator 4.4.1, all estates under Melalap Oil Mill have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad. Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			

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4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>There is evidence of land ownership verified for both operating units (Sapong Estate/ Melalap Estate). For Sapong Estate, there are 8 land titles which 1 has been leased from the Sabah State Government and 7 land title is leased as provisional lease with total hectarage of 3420.40 Ha. Verification has been done by auditor base on the hectarage master listing updated on 08/10/2024 registered total 3,417.27Ha. Sample of land title as per below</p> <table border="1"> <thead> <tr> <th>Land title No.</th><th>District</th><th>Hectarage</th><th>Leasing period.</th></tr> </thead> <tbody> <tr> <td>16xxxxxx</td><td>Tenom</td><td>42.94</td><td>999 years</td></tr> <tr> <td>16xxxxxx</td><td>Tenom</td><td>18.44</td><td>999 years</td></tr> <tr> <td>16xxxxxx</td><td>Tenom</td><td>163.45</td><td>999 years</td></tr> </tbody> </table> <p>Melalap POM is located on the land of Melalap Estate under Land Title# Country Lease 165314643. A copy of the land title was kept in the mill. Melalap Estate has 6 land titles with a total area of 2,257.25 Ha.</p>	Land title No.	District	Hectarage	Leasing period.	16xxxxxx	Tenom	42.94	999 years	16xxxxxx	Tenom	18.44	999 years	16xxxxxx	Tenom	163.45	999 years	Complied
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16xxxxxx	Tenom	42.94	999 years																
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4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under Melalap Oil Mill. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under Melalap Oil Mill, there has been no new planting on local people's land since the last assessment.</p>	Complied																
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during	Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under Melalap Oil Mill. The existing estates are not encumbered by any legal, customary and user rights.	Complied																

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	negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under Melalap Oil Mill, there has been no new planting on local people's land since the last assessment.	
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under Melalap Oil Mill. The existing estates are not encumbered by any legal, customary and user rights. This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under Melalap Oil Mill, there has been no new planting on local people's land since the last assessment.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under Melalap Oil Mill. The existing estates are not encumbered by any legal, customary and user rights. This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under Melalap Oil Mill, there has been no new planting on local people's land since the last assessment.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under Melalap Oil Mill. The existing estates are not encumbered by any legal, customary and user rights. This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under Melalap Oil Mill,	Complied

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		there has been no new planting on local people's land since the last assessment.	
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under Melalap Oil Mill. The existing estates are not encumbered by any legal, customary and user rights. This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under Melalap Oil Mill, there has been no new planting on local people's land since the last assessment.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under Melalap Oil Mill. The existing estates are not encumbered by any legal, customary and user rights. This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under Melalap Oil Mill, there has been no new planting on local people's land since the last assessment.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	SD Guthrie Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved.	Complied

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		<p>Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p> <p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under Melalap Oil Mill. This has also been evident through interview with the local communities.</p>	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p> <p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under Melalap Oil Mill. This has also been evident through interview with the local communities.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under Melalap Oil Mill. This has also been evident through interview with the local communities.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under Melalap Oil Mill. This has also been evident through interview with the local communities.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	<p>SD Guthrie Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p> <p>There is no acquisition on the new land planned or currently in progress, made by operating units under Melalap Oil Mill for the coming future project. This has been verified through field visit and interview with sampled stakeholders which consists of local communities and neighbouring smallholders.</p>	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	<p>SD Guthrie Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p> <p>There is no acquisition on the new land planned or currently in progress, made by operating units under Melalap Oil Mill for the coming future project. This has been verified through field visit and interview with sampled stakeholders which consists of local communities and neighbouring smallholders.</p>	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including	There is no customary right land for all operating unit under Melalap Oil Mill. No evidence that community have lost access and rights to land for plantation	Complied

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	employment and supply contracts to benefit from plantation development. - Minor compliance -	expansion as the operating units expands the planting area under certified area. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues.	
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	There is no customary right land for all operating unit under Melalap Oil Mill. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	There is no customary right land for all operating unit under Melalap Oil Mill. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will	There is no customary right land for all operating unit under Melalap Oil Mill. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	There is no customary right land for all operating unit under Melalap Oil Mill. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	FFB pricing has been classified as publicly available document and can be requested by the FFB supplier. As per interview with sample FFB supplier information of current FFB pricing can be sighted at the entrance of Melalap POM.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	The management has communicated with all the external FFB suppliers on 18/07/2024 by OCP department on RSPO certification, explanation of FFB pricing, payment terms and contract agreement.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	As per verification through the evidence of payment to the FFB supplier, there is evidence that the FFB pricing has been calculated based on the international CPO price, deduction of national tax and other services. As per interview, FFB supplier able to demonstrate their understanding on the FFB pricing calculations	Complied

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5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>There is only 1 independent smallholder that has supplied to Melalap POM and has been fully managed by their self. Contract agreement has been signed by both parties and they have full says on the decision making.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>There are 4 external FFB supplier for Melalap POM, 3 of them are collections centre and 1 is smallholders. Contract agreement sighted and sample as per below.</p> <ol style="list-style-type: none"> 1. Lxxxxx Pxxx agreement number P/x/xxxx/xxxxxxxxx dated 01/01/2024 for period Jan'24 until December'24 2. Axxx Sxxxx Cxxxx agreement number P/x/xxxx/xxxxxxxxx 01/01/2024 for period Jan'24 until December'24. <p>All contract agreement includes information on quality of FFB, term of terminations of contract, confidentiality etc. The agreement has been signed by both parties.</p>	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Payment has been made on weekly basis and has been verified based on the self-billed invoice and monthly crop received. The invoice has information on specified price, FFB price calculations and amount paid. Sample has been taken as per below.</p> <p>FFB supplier: Lxxxxxx Pxxx Invoice number: G/xxxxx- xxxxxxxx Dated: 30/09/2024</p>	Complied

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		<p>Period: 01/09/2024- 30/09/2024 Tonnage: 20.28mt</p> <p>FFB supplier: Axxx Sxxxxx Cxxxxxx Invoice number: G/xxxxx- xxxxxxx Dated: 17/01/2024 Period: 08/01/2024- 14/01/2024 Tonnage: 37.92mt.</p> <p>This been further confirmed through interview with sample FFB supplier confirmed that there is no issues of payment.</p>	
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>There are 2 weighbridges for Melalap POM and calibrations has been done on 17/02/2024 through De Mxxxxx Sdn Bhd reference DMxx/xx/xx/xxx/503 and DMxx/xx/xx/xxx/212.</p>	Complied
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>There is only 1 independent smallholder that supplying to Melalap POM which are Lxxxxxx xxxx. The independent smallholder has been certified under Malaysia Sustainable Palm Oil (MSPO) and has been communication on RSPO certification has been done on 18/07/2024. As per interview, as for now the SH has no interest for RSPO certifications.</p>	Complied
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p>	<p>SD Guthrie Berhad has established SOP to handle any grievances documented in Grievance Response Standard Operating Procedure, ver. No. 2 dated 18/07/2022. There is no grievance has been received which has been confirmed records and interview sample stakeholder.</p>	Complied

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	- Critical (Major) compliance -		
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains. The management has consulted with all the external FFB suppliers on 18/07/2024 by OCP department on RSPO certification, explanation of FFB pricing, payment terms, support by the UOC needed to improve the livelihood. and contract agreement. As per interview with sample smallholders, there is no support needed by the smallholder at the time of audit.	Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	The management has consulted with all the external FFB suppliers on 18/07/2024 by OCP department on RSPO certification, explanation of FFB pricing, payment terms and contract agreement.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	SD Guthrie Berhad has established a Standard Operating Procedure for Responsible Sourcing Guidelines (RSG), documented under Doc. No.: SD/SDP/GS/001, dated June 2020. This procedure is designed to guide the approach to third-party Fresh Fruit Bunches (FFB) and Crude Palm Oil (CPO) suppliers, ensuring that the products are sourced from verified, legal, and responsible sources. The responsibility for identifying potential external suppliers lies with the Outside Crop Purchaser (OCP) in the upstream sector. Additionally, an OCP Engagement Program was conducted on August 8, 2023, to involve smallholders and collection centers, aiming to educate them about sustainability and the RSG.	Complied

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5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There is only 1 SH supplying to Melalap POM which is Lxxxxx Pxxx and the SH has acquired license to sell FFB issued by Malaysian Palm Oil Board (MPOB)	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Not applicable since there is no scheme smallholders supplying to Melalap POM	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	Documented in the human right charter revised in year 2020 which clearly stated that SD Guthrie Berhad will not tolerate 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. As per verification for each operating units, there is evidence that there is no discrimination has been practices. Foreign workers from different origin, different gender has been treated equally and has been given same opportunities. This has been verified by the auditor through interview with the workers from different origin, races, gender.	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	There is evidence that there are no parties has been discriminated by the management where it has been confirmed through interview, site visit and records review. Sample has been taken for women workers where they have been treated equally as other workers where there has been paid equally with other workers which work as same job scope and entitle with the same benefits. All foreign workers have been allocated at the same housing compound and received same benefits regardless of the origin. There are no recruitment fees	Complied

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		has been charged to all foreign workers that has been recruited in year 2024. It has been confirmed through interview with the new recruited workers.	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	There is evidence that operating units has demonstrate that recruitment base on capabilities and qualities which has been verified during the interview by the operating units and for foreign workers at the origin countries. Sample of 12 workers has been taken from Indonesia and Malaysia, races and gender and has been verified based on interview, and documentation such as medical checkup and interview records.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	There is no pregnancy test has been done in all operating units. It has been confirmed through interview with Hospital Assistant and female workers. If there is any cases of delaying on menstrual, hospital assistant will advised the female workers to conducted test to nearest government health clinic.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	Guideline for establishing gender committee documented in "Gender Committee Guidelines" year 2024 revision 02 which outline the process of gender committee establishment including structure, roles & responsibilities and gender committee meeting and activities. Stated also related to reporting of sensitive issues clause 4.1, in the event of GC chair or any of the GC members receive complaints/grievances or incident of sensitive nature such as case to sexual harassment, domestic abuse and children in the OU, gender committee chair shall report to the OU manager directly for his next actions to report to the regional HR Manager. <u>Sapong Estate</u> Chaired by Ms Alice Seleng and latest meeting has been conducted on 12/07/2024 and 13/05/2024.	Complied

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		<p><u>Melalap Estate</u> Chaired by Ms Arbayah binti Sail and latest meeting has been conducted on 24/06/2024 and 09/09/2024.</p> <p><u>Melalap POM</u> Chaired by Ms Lydia Jubeleh and latest meeting has been conducted on 18/06/2024 and 28/09/2024.</p> <p>Several issues have been discussed such as ant and midge issues at the housing compound. Sighted that the gender committee has conducted several activities to improve women such as fire drill for housewife. Communication of the policy and procedure has been communicated during the meetings.</p>	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	There is evidence that all workers have been paid according to minimum wages order 2022 and as per collective agreement with SPIEU. It has been confirmed with through interview with sample workers and pays documentation such as pay slips, punch card for Month April'24, June'24 and September '24.	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Collective agreement sighted between SD Guthrie Berhad and Sabah Plantation Industry Employees Union for period 01/01/2023 until 31/12/2025. Collective agreement has outlined pay and condition which has been agreed by both parties such as annual leave, sick leave, public holiday, allowance etc. Other than that, the pays and benefits has been outline in the employment contract	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working	Payment details and employment terms are clearly outlined and formally recorded in employment contracts provided to all employees. These contracts encompass various aspects, such as the employment duration, working hours,	Complied

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	<p>hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>overtime policies, annual and medical leave entitlements, public holiday arrangements, mutual termination provisions, maternity benefits, and more. Importantly, these terms are in strict adherence to the Sabah Labour Ordinance, the Minimum Wages Order of 2020, the SOCSO Act of 1969, the EPF Act of 1991, the EIS Act of 2017, and the MAPA/NUPW agreement.</p> <p>Additionally, payroll documents, specifically payslips, provide accurate and comprehensive information regarding compensation for all labor performed. This encompasses individuals receiving daily-rated wages, piece-rated wages, payments for any overtime work, and remuneration for public holidays. Furthermore, our examination of sampled payslips confirms that all wages were disbursed in full compliance with the applicable national legal requirements. Salary deductions and overtime payments align with the stipulations of the relevant laws, including SOCSO, EPF, EIS, and are also in accordance with Labor Office permits.</p> <p>Stated in the employment contract working hours, deduction, overtime and leave entitlement. Mentioned in the employment contract that entitlement of leave is depending on the length of service. For workers less than 2 years services, they are entitled for 14 days of sick leave and 8 days of annual leave. Highlighted in the contract reasons for dismissal, period of notice and other legal labour requirements.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Sample of workers has been taken by the auditor for each operating units to verify the compliance of legal requirement and as per employment contract. Verification has been done through pay slips, employment contract, punch cards, check roll book and confirmation through interview with sample workers where there is evidence that the management for each operating units complies with legal requirement as per stipulated in the indicator 6.2.1</p>	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no</p>	<p>There is evidence that all operating units has been provided adequate housing to all workers at the workers housing complex with 2 rooms, toilet, shower area, dining hall and kitchen. Waters has been supplied through water</p>	Complied

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	such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. - Critical (Major) compliance -	treatment plans for all operating units, while for other estate it has been supplied through government water supplies the management has provided transport to school for kids free. There is sport facilities as been established such as football field and badminton court and worship area such as surau and temple. All operating units has appointed their own hospital assistant with sufficient equipment clinic to treat workers. Line site inspection has been conducted on weekly basis by the hospital assistant and VMO visit has been done every 2 weeks.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	All workers were also provided with 10kg of rice once every two months as per company's policy. Records of distribution of rice at all the operating units were made available for verification. Interview with the workers confirmed that they have easy access to adequate, sufficient and affordable foods at the nearby town. Sundry shops were also available nearby the estate/POM area and the price of goods were reasonable.	Complied
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. - Minor compliance -	Melalap Oil Mill and supply bases has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. The assessment has been done which the data has been verified form the checkrol-worker for period of January 2024, check roll- operating unit for period of Jan-Dec 2023 (calculation is RMxx/12), HR-fixed and denominator of total head count. The assessment has included wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc in the calculation. It has been verified by auditor base on the sample payslips for each operating units showed that the salary received complied with the minimum wage order 2022	Complied

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6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>All core activities such as milling activities, harvesting, chemical spraying and fertilizer application were performed by the permanent employee.</p> <p>Sighted during site visit, each operating unit is using SAP (System Application and Product in Data Processing) system to maintain and update the administration and operation information. By using the SAP, each operating unit has established 'Employee Master List' which includes an information such as:</p> <ul style="list-style-type: none"> • Employee number • Full name • Date of Birth • Nationality • Date of Join • Employment Status • Race <p>Each visited operating unit has appointed a contractor for POME transport, FFB transport and replanting. Through documentation review, estates and mill has established a contract agreement between the contractors and describe the term and condition of the job awarded. Verification on the contract agreement found, the contract agreement is signed by both parties. There are no casual or temporary workers has been recruited by all operating units as verified in the master list of workers.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			

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6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad adopt Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 which includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. 2. Respecting Freedom of Association: We respect the rights of employees to join and form organizations of their own choice and to bargain collectively. 3. Company respects the rights of all personnel to form and join trade unions of their choice to bargain collectively. <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the Sabah Plantation Industry Employees Union (SPIEU) union. Sighted list of workers that already registered as NUPW member and records memberships payments.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Minutes meeting has been made available for all operating units which has been conducted through social dialogue on monthly basis and the minutes meeting been classified as publicly available. There is evidence that the meeting has been attended by workers representative that has been elected by workers from the same origin countries. Details of social dialogue meeting that has been done on monthly basis as per below:</p> <p>Sapong Estate- 26/09/2024, 27/08/2024 and 29/07/2024 Melalap Estate- 23/09/2024, 14/08/2024 Melalap POM- 27/09/2024 and 22/08/2024</p>	Complied

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6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	Election of workers has been done through Whatapp which has been handle by regional support services and will be calculate and summarized. The outcome will be submitted social welfare services and appointment letter will be provided. There is evidence representative from different origin countries, gender has been elected for both operating units. It has been confirmed through interview that there is no interference from the management on the election process.	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	SD Guthrie Berhad adopted Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 with no changes on the policy which is includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labor and child pornography. Review of workers master list, interview and site visit confirmed that there are no workers below than 18 years old.	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	As per verification through sample of workers from different categories which are origin countries, gender, types of workers found that there are no workers below than minimum ages has been recruited. It has been verified based on master list, personal file and interview by the workers itself. Procedure for age screening has been established for both migrant and local workers in the recruitment procedure.	Complied
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	There is compliance to Human Right Charter which clearly stated the management commitment in clause 3.3 Respect and Uphold Children's Rights	Complied

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	- Critical (Major) compliance -	3.3.1 Eradicating child labour in our supply chain. SDPB will not employ anyone under the age of 18 years. Review of workers master list, interview and site visit confirmed that there is no workers below than 18 years old has been recruited.	
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	All operating units under Melalap Oil Mill able to demonstrate communication on no child labour policy which has been documented in Human Right Charter which clearly stated the management commitment in clause 3.3 Respect and Uphold Children's Rights 3.3.1 Eradicating child labour in our supply chain which has been conducted during the stakeholder meetings. As per interview, all stakeholders can demonstrate their understanding on the policy and procedure.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	SD Guthrie Berhad has developed Human Rights Charter (HRC) last revised 2020 where stated the policy and commitment of the company to prevent all forms of sexual harassment and violence at the workplace. Under section 3.2.1 of HRC stated that the company's commitment on eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking, and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. Furthermore, under section 3.2.6 mentioned the company is committed to creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. The policy has been communicated to the workers through musters and display on notice boards. Based on the interview with the workers (male and female), no issues on sexual harassment have been lodged or happened. They were also aware of the channels that they can use to lodge their concern. This has also been reminded during morning muster once in a while. Furthermore, the female workers are	Complied

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		aware of the procedure if such incident occurs whereby, they can reports using the Grievance channel such as Suara kami and whistleblowing, or direct report to the management.	
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	<p>Stated in the human right charter year 2020, commitment of SD Guthrie Berhad in protecting reproductive right and has been clearly outline in clause 3.2.5. There is evidence that the policy has been implemented where there is no restriction by the management for pregnancy and there are no pregnant/breastfeeding women handling with chemical. It has been further confirmed through interview with the female workers.</p> <p>Communication of the policy sighted based on briefing records for each operating units and further verified based on interview with the sampled stakeholders and workers which can demonstrate their understanding on the policy that has been established.</p>	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	<p><u>Sapong Estate</u></p> <p>New mother assessment has been done latest on 11/06/2024 and 01/10/2024 where there are 3 female workers with infant below than 24 months. The assessment has been done by medical assistant All of the new mother sent their kids to day care centre and has been allowed for breast feeding if needed. There is no special request has been recorded. As per interview with sample new mother, confirmed the statement above.</p> <p><u>Melalap POM</u></p> <p>There are 2 new mothers has been identified for Melalap POM which delivered in November 2023. One of the new mothers has been interviewed, she mentioned that she required specific times for breastfeeding and using company van for breastfeeding. All the request has been approved and</p>	Complied

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		confirmed that management has responded on the request that has been received.	
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	<p>It has been clearly stated in the Policy on the protection of human rights defenders (HRDs) year 2020 clause 3.3; protection against threats and retaliations that HRD and individual shall be protected from violence, threats and all form of retaliation and clause 3.1; the identity of individuals and information shared in by HRDs, shall be kept confidential to the fullest possible extent in a manner consistent with the need to conduct an investigation, unless the individual consents to disclosure or if disclosure is otherwise required by law. Based on the feedback received from the interview with sampled workers, it is confirmed that the grievance mechanism and policy have been effectively communicated to the workers.</p> <p>Each operating unit has established gender committee with objective to improve awareness, identify opportunity and improvement and issue of the workers specifically on women. The committee will act as the mechanism to monitor and investigate if there is any sexual harassment, domestic violence, and abusive children in the operating unit. The frequency of the meeting is once in three months.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. Contract substitution Involuntary overtime 	<p>Human Rights Charter 2020 included the commitment to respect and uphold labour rights, under which included the commitment as required in this indicator.</p> <p>Based on interview with the sampled workers, observation, documentation review and site visit to the labour quarters and estate facilities, the following were verified:</p> <p>a. Retention of identity documents or passports: All workers are free to keep their own passports. There is no retention of identity documents or</p>	Complied

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<ul style="list-style-type: none"> • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>passports unless these are needed for passport/work permit renewal. Sampled workers were interviewed and confirmed that they keep their passports themselves. This was further verified during the site visit to the labour quarters, where passport was observed to be kept in the workers houses. Furthermore, the management provides lockers for workers to keep their passport safely. The locker keys are kept by the workers with no duplicate keys held by the management.</p> <p>b. Charging of recruitment fee: As specified in the Migrant Worker Responsible Recruitment Procedure 2024, all recruitment fees are borne by the company. Interviews conducted with sampled workers also confirmed that they have not been charged any recruitment fees. They inform that the workers can report any recruitment fees incurred by them to the management prior to departure in source countries, after arrival, during induction process and through grievance procedures.</p> <p>c. Contract substitution: Based on document review, worker interview and site tour, it was noted all the migrant workers are legally recruited. Written employment contract was provided to them in a language that was understood by the workers. Explanation of terms and condition in the contracts was conducted in their origin country. Interview with the sampled workers confirmed that they have entered employment by voluntarily and freely basis. They also informed that all contract signed in their origin country is consistent with the terms and condition that they received upon arrival.</p> <p>d. Involuntary overtime: Based on interviews conducted with the sampled workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work.</p> <p>e. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers. There is no term and condition for any resignation and the flight tickets will bear by the company. Verification of the repatriation records and</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>interview with the sampled workers, shows that the workers are given freedom to going back for long leaves or going back for goods. Some workers, who have been employed in the estate and mill for 5 to 12 years, have taken long leaves 2 or 3 times during their services.</p> <p>f. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no loan/borrowing money has been given by the management to the workers. The is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement.</p> <p>g. Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by account and can be withdraw at the nearest bank and sighted evidence of payment that has been signed by the workers. There is evidence that there no workers' wages have been withheld. It has been further confirmed through interview with sampled workers.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Human Rights Charter 2020 included the commitment to respect and uphold labour rights, under which included the commitment as required in this indicator.</p> <p>SD Guthrie Berhad has established Migrant Worker Responsible Recruitment Procedure, dated 01/2024. This procedure serves as operational guidance on company commitments in the Human Rights Charter, 2020. The procedure among others included the appointment and monitoring of the agent's performance, and the benefits and rights of the workers at their home country and upon arrival in Malaysia.</p> <p>There are migrant workers has been recruited from Indonesia to work in Melalap Oil Mill. Verification during the audit found that there is evidence that</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		the policy and procedures has been implemented where each process of recruitment has been done such as signing employment contract, interview, and consultation with migrant workers at origin countries and One Stop Centre. Based on interview with sampled workers, it has been confirmed that all facilities and benefits has been provided equally for all foreign workers. Passport has been kept by the workers itself. There is no evidence of contract substitution where all migrant workers have been explained the content of the employment contract at the origin countries. It has been confirmed through interview with the workers itself.	
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The responsibility and accountability to ensure safety and health at each operating unit lie with the respective estate and mill manager. The estate and mill manager has been appointed by Regional Chief Executive Officer – Sabah Region as Chairman for OSH Committee at the respective unit. They are assisted by their nominated Assistant Manager and other OSH Committee members, representing both employer and employee of each operating unit. Official letters of appointment were provided to all OSH committee members for their respective roles. OSH Committee Organization Chart was updated in all operating unit visited.</p> <p>Furthermore, all operating unit visited has conducted regular meetings and two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare and discussed openly. OSH Meeting has been conducted on quarterly basis, attended by employer and employee representatives. The meeting was chaired by estate and mill manager at their respective unit. Minutes of OSH meeting was kept, and all the concern of the employees and any remedial actions taken was recorded. Workplace inspections were made prior to the committee meeting.</p> <p>Generally, among agenda discussed in the meeting are as follows:</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> • Safety briefing • Previous matter arising • Laws compliance • PPE inspection • Accident report • Training and competency • Workplace inspection report • Health report • PPE report • Other matters <p>Minutes of OSH meeting for visited operating unit were verified during the audit as follows:</p> <p><u>Sapong Estate</u></p> <p>OSH Committee meeting was conducted on 11/09/2024 (3rd quarter 2024), 13/06/2024 (2nd quarter 2024), 15/03/2024 (1st quarter 2024) and 15/12/2023 (4th quarter 2023).</p> <p><u>Melalap POM</u></p> <p>OSH Committee meeting was conducted on 13/09/2024 (3rd quarter 2024), 15/06/2024 (2nd quarter 2024), 21/03/2024 (1st quarter 2024) and 18/12/2023 (4th quarter 2023).</p> <p><u>Melalap Estate</u></p>	

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Criterion / Indicator		Assessment Findings	Compliance
		OSH Committee meeting was conducted on 12/09/2024 (3 rd quarter 2024), 24/06/2024 (2 nd quarter 2024), 26/03/2024 (1 st quarter 2024) and 21/12/2023 (4 th quarter 2023).	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad has established procedures on accident and emergency to be adopted by all operating units. This was referred to document title Emergency Preparedness & Response Procedures with reference number UM/HSE/SP/02 dated 17/11/2021 and Standard Operating Procedure of Incidents, Accidents & Non-Compliance Management dated 01/05/2023 with reference number SDP/GS-HSE/SP/01. Flowchart for emergency has been placed at strategic location e.g., office notice board, store, etc. It was observed emergency contact numbers were also displayed in notice board, workstation and facilities at all operating unit visited. Furthermore, there are list of Emergency Response Plan (ERP) has been established and published as for guidance:</p> <ul style="list-style-type: none"> • ERP for emergency • ERP for natural disaster • ERP for road accident • ERP for chemical spillage • ERP for fire <p>In addition, the organization for the ERP team was established by each operating unit. Interview with sample workers found they have good understanding on accident and emergency procedures. Portable eye wash was provided to the sprayers as verified during the field visit. While at the workstation, observed emergency shower and eyewash were installed at area which is exposed to the chemical hazards such as chemical premix area, chemical store, and laboratory. During site visit at the POM and audited estates, it was verified that adequate fire extinguishers and hose reels found to be located at strategic locations, operational and maintained in good conditions.</p>	Complied

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	<p>Records of training consists of attendance list, photos and briefing material is available for verification. Training for fire drill and emergency response plan at each estate was conducted as follows:</p> <p><u>Sapong Estate</u> Fire Drill training was conducted on 10/07/2024.</p> <p><u>Melalap POM</u> Fire Drill training was conducted on 04/10/2024 and 18/12/2024.</p> <p><u>Melalap Estate</u> Emergency Response Plan training for Emergency Response Team was conducted 11/09/2024 and Fire Drill training was conducted on 04/10/2024.</p> <p>Observed during site visit at all operating unit visited found, first aid kit is available with approved content. Record of monthly monitoring and inventory of first aid item also is available in the first aid box. First aid item was monitored by Medical Assistant at each operating unit. Interviewed with the person in charge in the visited area confirmed that they have attended first aid training and know how to use the item in the first aid kit. Record of training first aid were verified as follows:</p> <p><u>Sapong Estate</u> First Aid training was conducted on 19/09/2024.</p> <p><u>Melalap POM</u> First Aid training was conducted on 11/03/2024.</p> <p><u>Melalap Estate</u> First Aid training was conducted on 01/10/2024 and 07/03/2024.</p>	

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Criterion / Indicator		Assessment Findings	Compliance												
		<p>Accident record was verified during the audit. In practice, accident record and investigation were recorded and discussed during quarterly OSH meeting. JKKP 8 Form is submitted every year to Department of Occupational Safety and Health (DOSH). Sighted reporting system namely Rapid 4 System as an internal control system to report the accident cases to HQ for investigation. Each operating unit visited has submitted the JKKP 8 form through MyKKP portal as below:</p> <table><tr><td>Estate/Mill</td><td>Reference No</td><td>Date Submission</td></tr><tr><td>Sapong Estate</td><td>JKKP 8/168800/2023</td><td>23/01/2024</td></tr><tr><td>Melalap POM</td><td>JKKP 8/152413/2023</td><td>16/01/2024</td></tr><tr><td>Melalap Estate</td><td>JKKP 8/153763/2024</td><td>10/01/2024</td></tr></table>	Estate/Mill	Reference No	Date Submission	Sapong Estate	JKKP 8/168800/2023	23/01/2024	Melalap POM	JKKP 8/152413/2023	16/01/2024	Melalap Estate	JKKP 8/153763/2024	10/01/2024	
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6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The management provides appropriate PPE to the employees in accordance with HIRARC and Standard Operating Procedure. PPE issuance records were well maintained and made available for verification. Among information available in the record was name of employee, type of PPE, date of PPE received and receipt acknowledgement by the recipient. On-site verification and interview with workers showed that the appropriate PPE was provided to the workers. All worker sampled during the audit have been adequately trained in understanding SDS, safe working practices and the correct use of PPE. Interview with workers also indicated that each PPE they received was free, and the management did not charge any payments for the PPE. If there is any damage or it is time to change to new PPE, the worker only needs to bring the used PPE to the management and the management will issue new PPE to the worker.</p> <p>In addition, the management provides adequate shower room and soap for workers use after returning from activities involving chemical application.</p>	Complied												

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Criterion / Indicator		Assessment Findings	Compliance									
		<p>Lockers are also provided for convenience of employees to keep clean clothes for them to use to go home. To prevent PPE from being taken home, the management has provided area to wash and store PPE.</p> <p>Training records regarding PPE were verified and conducted as follows:</p> <p><u>Sapong Estate</u> PPE training was conducted by stages based on job assigned on 23/07/2024, 21/08/2024, 23/08/2024 and 05/08/2024.</p> <p><u>Melalap POM</u> PPE training was conducted on 07/03/2024 and 13/03/2024 under Laboratory and Chemical Handling training.</p> <p><u>Melalap Estate</u> PPE training was conducted on 13/06/2024.</p>										
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees by the organization and covered by accident insurance. Reviewed on workers profile records found that all workers are covered by the accident insurances. All local workers and foreign workers were covered under SOCSCO scheme. Sighted the contribution form (8A) "Jadual Caruman" for January, May and August 2024 for the mill and estate visited.</p> <p>Example of records verified are as follows:</p> <p><u>Sapong Estate</u></p> <table><tr><td>Month</td><td>Total Worker</td><td>Amount</td></tr><tr><td>January 2024</td><td>272</td><td>RM10,194.90</td></tr><tr><td>May 2024</td><td>263</td><td>RM11,650.90</td></tr></table>	Month	Total Worker	Amount	January 2024	272	RM10,194.90	May 2024	263	RM11,650.90	Complied
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Criterion / Indicator		Assessment Findings			Compliance																											
		<table><tr><td>August 2024</td><td>272</td><td>RM11,074.00</td></tr></table> <p><u>Melalap Estate</u></p> <table><tr><td>Month</td><td>Total Worker</td><td>Amount</td></tr><tr><td>January 2024</td><td>145</td><td>RM5,092.90</td></tr><tr><td>May 2024</td><td>140</td><td>RM6,166.90</td></tr><tr><td>August 2024</td><td>148</td><td>RM7,199.90</td></tr></table> <p><u>Melalap POM</u></p> <table><tr><td>Month</td><td>Total Worker</td><td>Amount</td></tr><tr><td>January 2024</td><td>81</td><td>RM3,297.40</td></tr><tr><td>May 2024</td><td>81</td><td>RM3,848.60</td></tr><tr><td>August 2024</td><td>82</td><td>RM3,827.70</td></tr></table> <p>Furthermore, workers have access free medical consultation and medication at the clinics located in their respective estate and mill. They are attended to by certified Medical Assistant. Records of medical inventory, VMO visit, and patients treated were made available for verification.</p>			August 2024	272	RM11,074.00	Month	Total Worker	Amount	January 2024	145	RM5,092.90	May 2024	140	RM6,166.90	August 2024	148	RM7,199.90	Month	Total Worker	Amount	January 2024	81	RM3,297.40	May 2024	81	RM3,848.60	August 2024	82	RM3,827.70	
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>Records on Lost Time Accident (LTA) metrics at the operating unit visited were available for verification. JKPP 8 Form is submitted every year to Department of Occupational Safety and Health (DOSH). Each operating unit visited has submitted the JKPP 8 form through MyKKP portal as below:</p> <table><tr><td>Estate/Mill</td><td>Reference No</td><td>Date Submission</td></tr><tr><td>Sapong Estate</td><td>JKPP 8/168800/2023</td><td>23/01/2024</td></tr><tr><td>Melalap POM</td><td>JKPP 8/152413/2023</td><td>16/01/2024</td></tr></table>			Estate/Mill	Reference No	Date Submission	Sapong Estate	JKPP 8/168800/2023	23/01/2024	Melalap POM	JKPP 8/152413/2023	16/01/2024	Complied																		
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Criterion / Indicator		Assessment Findings			Compliance
		<div>Melalap Estate</div>	JKKP 8/153763/2024	10/01/2024	
		Further verification in the above JKKP 8 Form submitted, it was found the following: <u>Sapong Estate</u> 3 LTA cases recorded resulting in a total of 21 lost working days. <u>Elphil POM</u> One LTA cases recorded resulting in a total of 1 lost working days. <u>Melalap Estate</u> One accident cases recorded resulting in total of 1 lost working days.			
Principle 7: Protect, conserve and enhance ecosystems and the environment					
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.					
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	IPM plans for the estate is guided by the ARM Section 15, Crop Protection (issue no. 3, Dec 2023). Among the plans established and implemented were: i) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as Turnera subulata, Cassia cobanensis, Antigonon leptopus, along the roadsides. ii) Establishment of legume cover crop (LCC) and chipping of felled trunks at the replanting area to prevent the breeding of rhinoceros beetles.			Complied
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	Based on site visit, there was no evidence of species under Global Invasive Species Database and CABI.org are used by the estate.			Complied

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Criterion / Indicator		Assessment Findings	Compliance
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	Based on site visit, there was no evidence of fire is used for pest control by the estate.	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The justification of all pesticides used in the estate were documented in Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by SD Guthrie Berhad. Section 16: Weed Control of Agricultural Reference Manual, latest update issue no. 3, dated December 2023 was clearly stated the justification of pesticides used in the estate which includes chemical list indicates the purpose of usage (intended target), active ingredients names as well as the specific targets. All pesticides used were those officially registered under the Pesticide Act 1974. The certification units confined usage to only class II, class III & class IV pesticides. Among types of pesticides used with justifications included: <ul style="list-style-type: none"> • Glyphosate Isopropylamine 41% • 2,4-D Dimethylamine 60%, • Metsulfuron Methyl 20%, • Triclopyr Butotyl 32.1%, • Diuron 42%, • Glufosinate Ammonium 13.5%, • Sodium Chlorate 99%, • Fluroxypyr Meptyl Ester 29.6%, • Brodifacoum 0.005% • Cypermethrine 16% 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		All chemicals usage was based on the "need to do basis" to enhance field operations. Specific pesticides had been used to deal with respective target pest, weed, or disease. Based on the document review and inspection at the chemical store, all sampled estates had used only class II, class III & class IV pesticides. No illegal agrochemicals (stated by local and international laws) in particular Paraquat were used in the estates. No Class 1 chemicals had been used by audited estates.	
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -	Records of pesticides used and active ingredient (a.i) per Ha is monitored monthly in the "Monitoring Pesticide Usage per Hectare and per Ton FFB Production" for year 2024. Records of pesticides used (including active ingredients used and their Lethal Dosage (LD 50), quantity of usage and amount of a.i applied) is maintained by Sapong and Melalap Estate. Average data for estates as below: <ul style="list-style-type: none"> Melalap Estate: 2.83 Sapong Estate: 2.51 	Complied
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -	The justification of all pesticides used in the estate were documented in Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by SD Guthrie Bhd. Section 16: Weed Control of Agricultural Reference Manual, latest update issue no. 3, dated December 2023 was clearly stated the justification of pesticides used in the estate which includes chemical list indicates the purpose of usage (intended target), active ingredients names as well as the specific targets. All pesticides used were those officially registered under the Pesticide Act 1974. All sampled estates emphasis on implementing biological control to manage oil palm pests, such as leaf-eating pests and rats. IPM techniques employed at the estate involve regular monitoring of pest populations and the utilization of triggers to determine when control measures should be initiated.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Although there have been no significant outbreaks of leaf-eating pests, the visited estate actively promotes the establishment of beneficial plants along main roads and block boundaries to attract natural predators. This has been verified during field visits at each operating units.</p> <p>To reduce chemical usage, the estate has implemented a spraying program for each field, applying the correct dosage of chemicals according to guidance from ARM. This also applies to the spraying equipment, such as knapsack pumps, which are calibrated periodically to ensure accurate dosages are applied in the field. Targeted weeds were communicated to the workers, as verified during interviews with the sprayers. For flat areas, grass cutting is performed as part of efforts to minimize chemical usage.</p>	
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>No prophylactic use of pesticide was detected during the audit at all audited estates. This was confirmed through pesticide usage records and interviews with staff, mandores and pesticide applicator. Further verification found that the amount of chemical usage was based on recommendation provided on the chemical label. This indicates that chemical calibration process was in place to determines the correct amount of chemical needed and how to premix it in the water. Such practices aim to optimize the effectiveness of chemical applications while minimizing waste and potential environmental impact.</p> <p>In practice, the estates approach to pesticide usage is based on targeted, where pesticides are applied only when necessary to address specific target problem. This means that pesticides are not applied as a preventive measure before any pest related issues arise.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence</p>	<p>Based on sampled estates Chemical Register using OSHA regulated format, there were only class II, III & IV chemicals used by the estates. There were no pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat used.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>		
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Trainings on safe handling of chemical and right method of spraying were given to the relevant workers which include storekeeper, pre-mixers, and herbicides sprayer. This also in line with recommendation by CHRA assessor. Various methods of training such as briefing, practical training and on-the-job supervision were used to ensure effective delivery of knowledge. Training includes spraying technique, precautions, and symptoms of toxic reactions as skin disorders, rashes, breathing difficulties or nail problems. Records of training were well maintained for verification at all the visited estates.</p> <p>Example of training verified are as below:</p> <p><u>Sapong Estate</u></p> <ul style="list-style-type: none"> • Training for sprayer (include the chemical handler training) that was conducted on 26/07/2024 and 15/02/2024. <p><u>Melalap Estate</u></p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Chemical handling training that was conducted on 06/03/2024. • Spraying activity training that was conducted on 13/06/2024. • Refresher training for sprayer that was conducted on 13/07/2024. <p>Precautions attached to products has been properly observed and applied as verified during interview with sampled workers that handle the chemical. During site visit at chemical activities area and chemical store for all visited estates found that implementation of the chemical activities is according to the SDS especially for PPE usage and the emergency response. Interviews with the sprayers showed that they have a good understanding of their job, including the chemicals they use on a given day and the PPE required during spraying activities. Portable signage also displayed at areas of spraying activity which indicates that the date of spraying. The estate has adequate facilities for mixing of pesticides and cleaning up after work.</p>	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>All mill and estates under SD Guthrie Bhd adopted with Chemical Safety Management Procedure reference number UM/HSE/OCP/04 dated 09/03/2021 to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. The procedure contains the following:</p> <ul style="list-style-type: none"> • Objectives, scope, roles & responsibilities • General provision • Requirement & procedure: Procurement of chemical (selection of chemical), Assessment of chemical hazardous to health, transportation of chemical, receiving of chemicals, storage of chemical, disposal of chemical wastes, training, and maintenance of equipment. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>During site visit at all sampled estates, it was found the following:</p> <ul style="list-style-type: none"> • Stores are locked and only authorized person allowed to enter. • Appropriate safety and warning signage • Original labelling is available for chemical, fertilizer and lubricants. • Spill kit is available. • Good ventilation at chemical store. <p>Chemical were mixed in the pre-mixing areas of the store that was locked. Emergency shower and eye wash were available at the pesticides store in case of any accidents happen. The water pressure was noted to be sufficient for such purpose. In addition, Safety Data Sheets (SDS) were available in the stores. The SDS are in English and Bahasa Malaysia.</p>	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>The Standard Operating Procedure (SOP) for the disposal of pesticide container is mentioned under procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management. This procedure includes details on triple rinsing procedure and outlines the relevant training to be conducted in this regard.</p> <p>In the procedure also mentioned that all class 2 and above containers shall tripled rinsed and punctured at the bottom if the waste generator intends to dispose of them as non-scheduled waste. However, if the containers are to be disposed of as scheduled waste, the triple rinsing and puncturing process is not required.</p> <p>During site visit, interview, and documentation review, it was verified that excess empty pesticides container in the estate were triple rinsed and punctured. Following this process, these containers are treated as non-scheduled waste. Chemical container labelled with 'skull' were re-used for spraying purposes. For Sapong Estate, the company, Lxxxxxx Bxxxxxx Xxx Xxx</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		(a DOE-approved licensed contractor) has been appointed to collect recycled empty chemical containers, with the latest collection occurring on 24/06/2024. At Melalap Estate, the latest collection for the disposal of empty pesticide containers was on 30/09/2024, also handled by a DOE-approved licensed contractor, Kxxxxxx Axxx Xxx Xxx. Chemical container was re-used for spraying purpose by Sapong and Melalap Estate and found that record of issued in and out of the chemical container is tally with the physical inventory at recycle store.	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>There was no aerial spraying at Melalap Estate. However, drone spraying was conducted at the nursery in Sapong Estate for pest and disease control.</p> <p>SD Guthrie Berhad has established a Standard Operating Procedure (SOP) entitled 'Spraying Application of Pesticide Combination for Pest and Disease Control in Oil Palm Nursery using Unmanned Aerial Vehicle Blanket Sprayer (All Regions)' (Ref.: CP-SOP-M-37) to ensure that drone spraying aligns with the company's vision of practicing mechanization in its operations, with the objective of reducing dependency on manual labour in oil palm operations.</p> <p>Sighted an agreement for drone spraying between the Sapong Estate and Juru Ukur Juta Sdn Bhd, dated 01/01/2024, and available for verification.</p> <p>As of the audit date, the application for government authority approval is in progress. An email dated 20/03/2023 from the Malaysian Research Accelerator for Technology and Innovation (MRANTI), an agency under the Ministry of Science, Technology and Innovation (MOSTI), indicated that the Civil Aviation Authority of Malaysia (CAAM) permits drone spraying to be conducted if safety SOPs are met and the operator obtains an Aerial Work Certificate (AWC). Due to limitations in reviewing and approving incoming applications related to drone operations including those beyond agriculture, approval may take up more than 17 months.</p> <p>Furthermore, an email dated 29/03/2023 stated that MRANTI, on behalf of CAAM, advises and encourages all drone operators, especially in the agriculture</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>or plantation sector, to apply for the AWC. In the meantime, if operations are ongoing, it is essential to ensure that drone activities are conducted safely in accordance with the existing SOPs and guidelines from CAAM. This email was issued following discussions between MRANTI and CAAM.</p> <p>To comply with the requirements set by the authority mentioned in the email, the drone operators have obtained the following AWCs:</p> <ul style="list-style-type: none"> • Remote Pilot Certificate of Competency Basic (RCoC-B): Training conducted from 01 to 23/02/2024 by SG Akademi (M) Sdn Bhd, an approved remote pilot training organization. • DJI AGRAS T20P & T10 Agriculture Drone Pilot Training: Conducted by Keningau Kimia Sdn Bhd, with certificates issued on 21/07/2023 and 01/08/2024. <p>In addition, a briefing for workers and staff regarding drone spraying was conducted by management during the muster call on 19/06/2024, ensuring that the briefing took place at least 48 hours before the commencement of drone spraying activities in the nursery. Briefings for neighbouring stakeholders were not conducted, as the nursery area is located in the middle of the estate and is far from stakeholder locations. This was confirmed by sampled stakeholders and workers interviewed during the audit.</p> <p>Records of aerial spraying activities were maintained and are available for verification, prepared by the estate supervisor and verified by estate managers, including application records for July and August 2024.</p>	
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>All chemical handlers for each operating unit were undergo medical surveillance to ensuring the health and safety of workers exposed to hazardous chemicals. The medical surveillance is conducted in accordance with the Use and Standard of Exposure to Chemical Hazardous to Health (USECHH) Regulations 2000, which is outlined in the Occupational Safety and Health Act (OSHA) 1994. In addition, one of the recommendation from the CHRA report for each operating</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>unit is to conducted medical surveillance to the workers exposed to hazardous chemicals. The results of medical surveillance were as follows:</p> <p><u>Sapong Estate</u></p> <p>All workers were exposed to the chemical hazards have undergo medical surveillance programme as recommended in CHRA report. The latest medical surveillance was conducted on 02/09/2024, and the results are still pending receipt by the estate. Last year's medical surveillance was conducted on 27/11/2023 by Occupational Health Doctor (OHD) with DOSH registration no.: HQ/13/DOC/00/315. In the report, the next medical surveillance shall be performed by the 27/11/2024. From the report, 26 workers were undergone medical surveillance and the result medical surveillance have been acknowledged by the workers. All workers undergo medical surveillance is fit to continue their work without any abnormal results. In addition, site visit at chemical store, fertilizer store and chemical premix area found that the workers understand and able to demonstrate the used of appropriate PPE for conducting the work related to chemical as recommended in the CHRA report. Apart of medical surveillance, which is conducted yearly, monthly clinical checks are also carried out by the Medical Assistant to the workers exposed to the chemical hazards. Monthly health checking records (done at the clinics) were available and satisfactorily maintained. Health check includes nail, pulse, blood pressure and skin.</p> <p><u>Melalap POM</u></p> <p>Medical surveillance and biological monitoring were conducted on 15/05/2024 by Occupational Health Doctor (OHD) with DOSH registration no.: HQ/08/DOC/00/695 and the result was received on 16/07/2024. Based on the results of medical surveillance, 39 of the workers who exposed to chemical exposure consists of manganese and hexane are fit to work and no medical</p>	

Criterion / Indicator		Assessment Findings	Compliance
		<p>removal protection is recommended. The result has been acknowledged by the workers as confirmed during the interview with the sampled workers who exposed to the chemical.</p> <p><u>Melalap Estate</u></p> <p>Latest medical surveillance was conducted on 02/09/2024, however the result is yet to receive. Last year's medical surveillance was conducted on 27/11/2023 by the Occupational Health Doctor (OHD) with DOSH registration no.: HQ/13/DOC/00/315. 17 workers were undergone medical surveillance is fit to continue their work without any abnormal results. In the report states that the next medical surveillance shall be performed by the 27/11/2024. Results of the medical surveillance have been acknowledged by the workers, as verified during interviews with the sampled workers who undergone the medical surveillance.</p>	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Mill and estates under Melalap Oil Mill have prohibited women workers who are confirmed pregnant or breast-feeding to handle chemicals as per Group Sustainability & Quality Policy Statement signed by Group Managing Director dated 02/12/2019 and Human Rights Charter, revised 2020.</p> <p>Section 3.2.3 and 3.2.5 of Human Rights Charter were stated as follows:</p> <ul style="list-style-type: none"> • Section 3.2.3 Providing a safe and healthy working environment by delivering accident prevention training, risk minimisation, focused training, and providing appropriate protective equipment. • Section 3.2.5 Promoting 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. We will facilitate opportunities for advancement for our employees, 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>especially women, by removing barriers to progress and respecting reproductive and maternal rights.</p> <p>Observed throughout the field visit and verification during interview with sampled workers, it was found that no pregnant or breastfeeding women, nor workers with medical restrictions, were assigned to tasks related to chemicals in the operating units visited.</p>	
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Wastes management plan was developed based on the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through landfill authorised by the Keningau District Council, and recyclable wastes were sent to recycle centres.</p>	Complied
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Generally, the workers have demonstrated good understanding in proper disposal of wastes. The visited labour quarters were observed to be in clean conditions. Wastes were properly disposed as mentioned in Indicator 7.3.1.</p> <p>SW disposed through licensed contractors which were verifiable through eSwis. Spent lubricants (SW305), and contaminated rags, PPE and filters (SW410) were collected by licensed vendor.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>There was no evidence of open fire was used for waste disposal at all the visited operating units.</p>	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>ARM Section 8 covers the procedure for fertilizer application for both immature and mature. The procedure gives the guideline type of fertilizers to be used, timing to apply, dosage and placement.</p>	Complied

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Criterion / Indicator		Assessment Findings		Compliance		
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Periodic foliar sampling analysis was last conducted on 12/06/2024 (Sapong Estate) and 12/02/2024 (Melalap Estate) to monitor the changes in nutrient status. The results of the analysis were used by the agronomist for their recommendation for fertilisers applications programme. The soil analysis is done once in 5 years. The last analysis was conducted on 16/10/2023 (report #S9/2023) for Sapong Estate and 02/11/2023 (report #S8/2023) for Melalap Estate. Analysis reports were made available for verification.		Complied		
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	EFB mulching was done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Melalap POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/Ha. Palm residues such as fronds and trunks were left to naturally decompose in the field which eventually be the organic nutrient enriching the soils. The POME sludge from the effluent pond desludging activity is kept in a retention pond within the ETP system. It would be applied in the field whenever necessary.		Complied		
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Records of fertiliser input were well maintained in various documents such as store issuance record, bin cards and month end account to name a few. Among the information available in the records was type of fertiliser, quantity and field number applied including date of application. Based on sampled fields, the quantity of fertilisers issued out (i.e., applied) from the store according to SAP software system was tally with the recommendations by agronomist.		Complied		
Criterion 7.5: Practices minimise and control erosion and degradation of soils.						
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	There were no soils classified as marginal or fragile. Based on the soil maps, among the major soil series exist in the estates are as follows: <table><tr><td>Soil type</td><td>Area (%)</td></tr></table>		Soil type	Area (%)	Complied
Soil type	Area (%)					

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Criterion / Indicator		Assessment Findings			Compliance
			Melalap	Sapong	
		Kelawat	36	-	
		Koyah	18	-	
		Tanjung Lipat	41	-	
		Sinaron	-	66	
		Bingkor	-	16	
		Brantian	-	10	
		Maps identifying steep terrain were also made available for verification. The current practice of the estate is to exclude the previous palms in the steep slope (> 25°) from being replanted and classified it as Conservation Set Aside (CSA).			
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	Based on the visits of the replanted fields at the sampled estates, there was no replanting at the area which identified as steep terrain.			Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	There was no new planting at the sampled estates.			Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.					

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Criterion / Indicator		Assessment Findings	Compliance
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	There was no new planting at the sampled estates.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	There was no new planting at the sampled estates.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	There was no new planting at the sampled estates.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	NA as there was no new planting nor there was soil categorised as peat at the sampled estates.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. - Minor compliance -	NA as there was no new planting nor there was soil categorised as peat at the sampled estates.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	NA as there was no new planting nor there was soil categorised as peat at the sampled estates.	Not Applicable

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Criterion / Indicator		Assessment Findings	Compliance
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	NA as there was no new planting nor there was soil categorised as peat at the sampled estates.	Not Applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -	NA as there was no new planting nor there was soil categorised as peat at the sampled estates.	Not Applicable
7.7.6	(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -	NA as there was no new planting nor there was soil categorised as peat at the sampled estates.	Not Applicable
7.7.7	(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building	NA as there was no new planting nor there was soil categorised as peat at the sampled estates.	Not Applicable

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Criterion / Indicator		Assessment Findings	Compliance
	<p>and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>		
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Water management plans were in place and documented at all the sampled OUs which in general aimed to promote more efficient use and maintaining the availability of water sources and to avoid negative impacts on other users in the catchment. Based on review, it was noted that the plans have addressed the following:</p> <p>a) No restriction of access to clean water or contribute to pollution of water used by communities.</p> <p>b) The estate and mill have their sources of clean water from the treated river water. The water supply is 24 hours/day.</p>	Complied
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>The protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones was guided by a few references such as:</p> <ul style="list-style-type: none"> SDG's Riparian Reserve Management dated April 2021, by Conservation and Biodiversity Unit/Group Sustainability Department The RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit were referred in the establishment of the abovementioned references. 	Complied

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7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	The mill applies the biological system with ponds in series for its treatment of effluent. The mill is disposing its effluent to waterways. The condition of the discharged effluent was analysed every month by an accredited laboratory and among the parameters analysed are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Verification of the last 12 months results showed that all the BOD results were within the regulated limit (i.e., 20 ppm).	Complied
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring was done daily through flowmeter readings. Based on the records, the mill has been using less than 2 m ³ /mt FFB per year as of to-date.	Complied
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	This is addressed in the annual Energy Management Plan by all the sampled OUs. Among the action plans established were: <ul style="list-style-type: none"> doing regular maintenance of diesel-powered machinery educational programme for the operators on fuel saving utilisation of fibre and shell as biofuel for boiler operation Records of fossil fuel consumption were well maintained by the Ous and made available for verification. The records were also referred to update the RSPO GHG calculator.	Complied
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	Among the main sources of GHG emission identified were methane (CH ₄) emission through POME treatment and fertiliser. Other less significant GHG emissions identified were fossil fuel consumptions. The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator	Complied

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		ver. 4. Based on verification of various records such as store issuance records and SAP system, all the data was found to be accurate.	
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	NA as no new development area was initiated after 2014.	Complied
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Plans to minimise the environmental impact were mainly established through implementing the best practices documented in the procedures and guidelines, apart from the environment management plans. Among the monitoring methods in place were on-line Continuous Emission Monitoring System (CEMS) for boiler chimney dark smoke emission, third-party environmental audit, and POME analysis. Based on verification of these monitoring records, all the regulated limits were complied.	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Newly replanting fields were observed to have no trace or signs of burning. Interview with stakeholders confirmed that there was not open burning for land preparation. The estate practises felling and chipping method in land preparation for replanting.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.	Signage for no open burning have been put up within the vicinity of the estate. Continuous awareness is given to workers during morning briefing. Fire response teams have also been established and trained to fight fire using the	Complied

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	- Minor compliance -	firefighting equipment prepared. There was no incident of fire breakout reported since the last assessment.																		
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Engagement with adjacent stakeholders on fire prevention and control measures was made through Stakeholder Consultation and meeting in-person. The last stakeholder consultation was held on 07/08/2024 which includes all the operating units.	Complied																	
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.																				
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	Not applicable since no new development by the certification unit.	Not Applicable																	
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder	An HCV assessment had been conducted internally in 2016 with report dated March 2016 by SDP GSD (formerly known as PSQM Dept.). The assessment was conducted in participatory with stakeholders including surrounding communities and government authorities. Based on the report, HCV 4 was identified to be present as the following details: <table border="1" data-bbox="1008 1220 1926 1372"> <thead> <tr> <th>Estates</th><th>Type</th><th>Ha</th><th>HCV #</th></tr> </thead> <tbody> <tr> <td rowspan="4">Melalap</td><td>Water catchment</td><td>3.67</td><td>4</td></tr> <tr> <td>River reserve</td><td>84.25</td><td>4</td></tr> <tr> <td>Aki Tampulan</td><td>0.0045</td><td>6</td></tr> <tr> <td>Stone Cemetery</td><td>0.37</td><td>7</td></tr> </tbody> </table>	Estates	Type	Ha	HCV #	Melalap	Water catchment	3.67	4	River reserve	84.25	4	Aki Tampulan	0.0045	6	Stone Cemetery	0.37	7	Complied
Estates	Type	Ha	HCV #																	
Melalap	Water catchment	3.67	4																	
	River reserve	84.25	4																	
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	Stone Cemetery	0.37	7																	

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	consultation and take into account wider landscape-level considerations. - Critical (Major) compliance -	Sapong	Stream buffer zone	41.89	4	
			Slope area	0.40	4	
			Cemetery	3.43	6	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable.				Not Applicable
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -	HCV management plan was made available for verification. Generally, the main objectives of the management plan are to prevent river pollution by establishing riparian zones and preserve biodiversity by restricting human intrusion to the HCV area. Among the established action plans were creating awareness among employees about HCV and RTE and conducting monitoring of the HCV areas through patrolling.				Complied
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	There was no changes as per previous year record. There were no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations.				Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce	Among the educational programmes conducted for the workers on protection of RTE were training on policy and legal compliance in relating to conservation of RTE species, regular reminder during muster call and placing of pictorial and				Complied

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Criterion / Indicator		Assessment Findings	Compliance
	about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	no hunting signage. Records of training were made available by the operating units for verification. Interview with the sampled workers showed that the understanding on RTE among them was good.	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	Although there is no new land development after 15/11/2018, the estates continue to monitor the status of their identified HCVs in 2016 through a few ways such as regular patrolling and getting feedback from the workforce. The objective of the patrolling was to report sighting of RTE and observed any signs of intrusion and hunting.	Complied
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	There was no land clearing after November 2005. The estate was established for Oil Palm since 1970s. Thus, the Remediation and Compensation Procedure (RaCP) does not apply.	Complied

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2023 for Melalap Oil Mill and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2023 for Melalap Oil Mill and supply base are as follows:

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	1.36	OER	20.37
PKO	1.36	KER	4.86

Production	t/yr	Land Use	Ha
FFB Processed	49,918.55	OP Planted Area	3397.29
CPO Produced	10169.6	OP Planted on peat	0
PKO Produced	2425.69	Conservation (forested)	126.14
		Conservation (non-forested)	4.07
		Total	3527.50

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	33553.77	0.80	0	0	0	0	33553.77	0.80
CO ₂ Emission from fertilizer	2999.86	0.07	0	0	0	0	2999.86	0.07
NO ₂ Emission	1434.17	0.03	0	0	0	0	1434.17	0.03
Fuel Consumption	16.67	0	0	0	0	0	16.67	0
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-31804.54	-0.76	0	0	0	0	-31804.54	-0.76
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	6199.94	0.15	0	0	1151.69	0	7351.63	0.15

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	9784.88	0.20
Fuel Consumption	3.48	0
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	9788.36	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

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

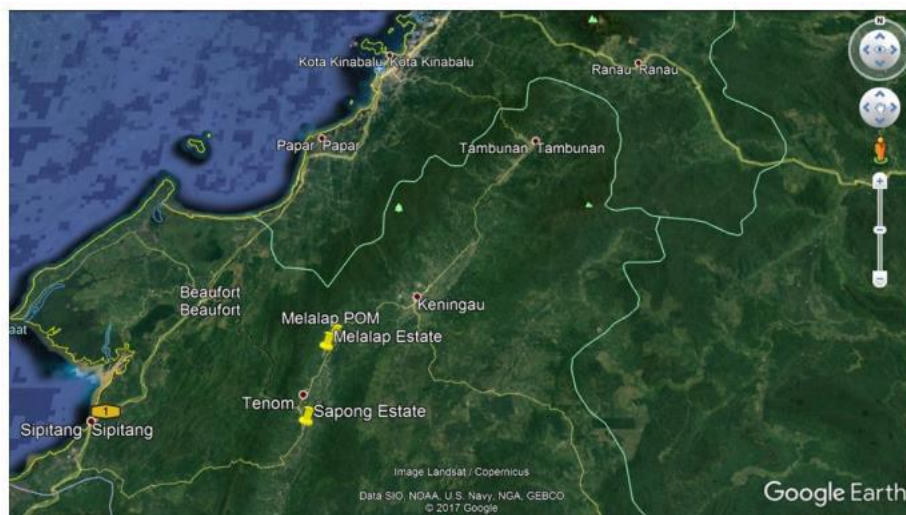
*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

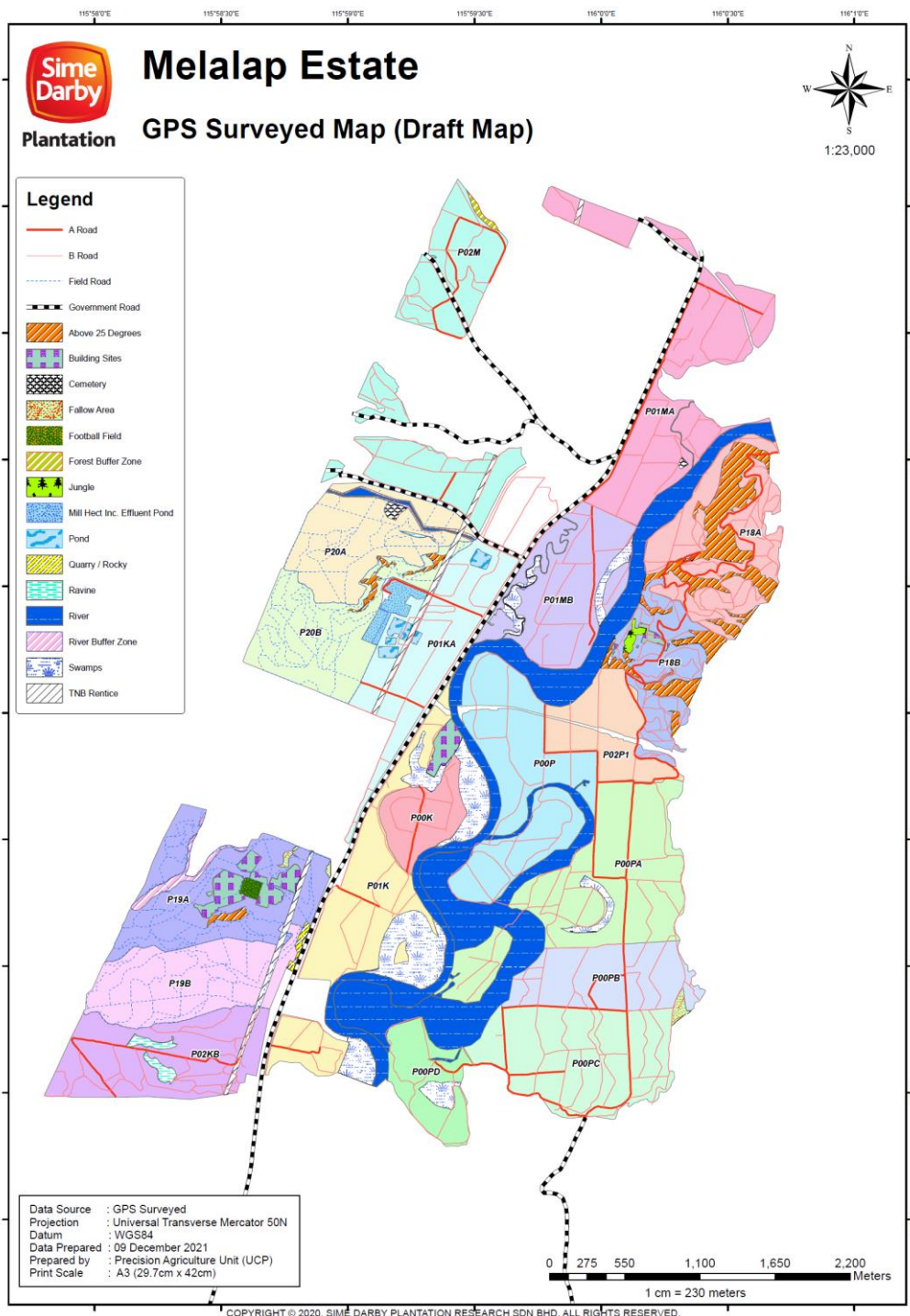
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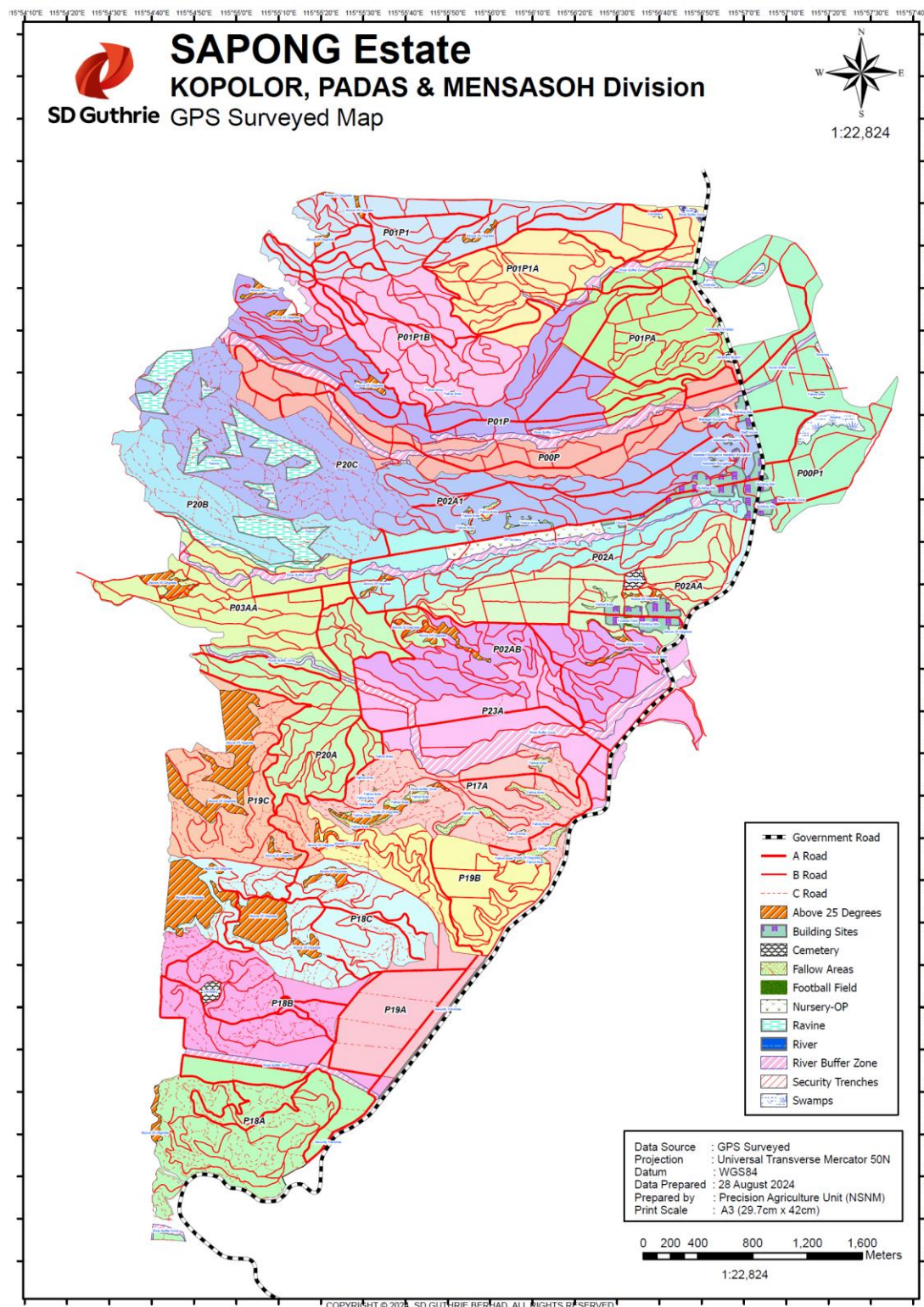
Appendix C: Location Map of Certification Unit and Supply bases

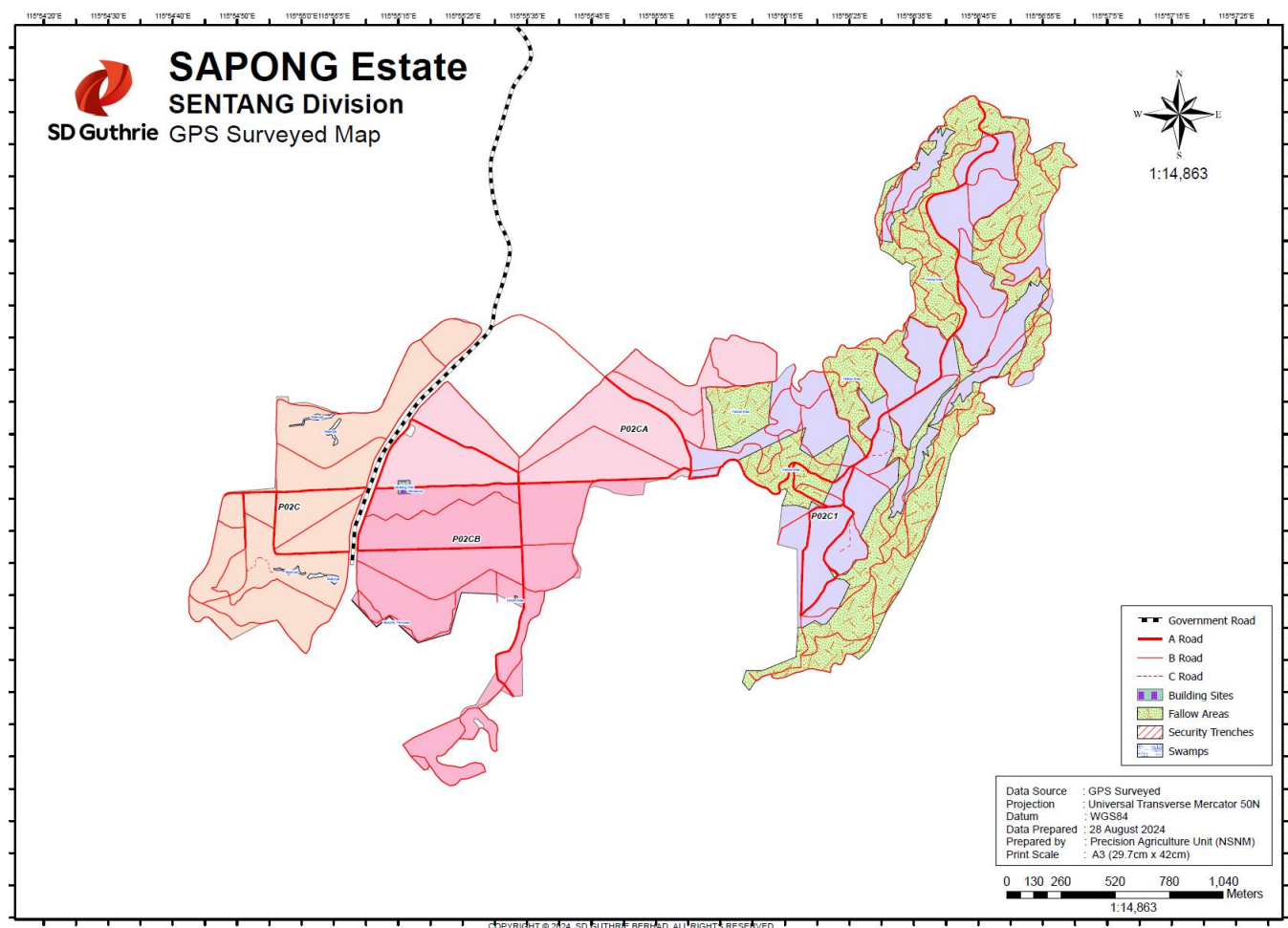


Appendix D: Estate Field Map

Melalap Estate



Sapong Estate

Sapong Estate – Sentang Division

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Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other:
Risk Factor Applied	N/A	N/A	N/A
Justification of Risk Factor Applied			
Number of samples			
Remarks			

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Not Applicable									
Total									
Note: * are smallholders sampled in this audit.									

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Appendix F: List of Abbreviations

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