

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: Sime Darby Plantation Berhad
Client Company Address: Level 11, Main Block, Plantation Tower, No 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU) 7- Bukit Kerayong Palm Oil Mill Location of Certification Unit: Bukit Kerayong Road, 42200 Kapar, Klang, Selangor, Malaysia
Date of Final Report: 05/06/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Sime Darby Plantation Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 11, Main Block, Plantation Tower, No 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU) 7 – Bukit Kerayong Palm Oil Mill		
Location / Address	Bukit Kerayong Road, 42200 Kapar, Klang, Selangor, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD)	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	+(603) 78484000 (HQ)	Facsimile	-
Bukit Kerayong Mill is in transition to permanently shut down tentatively start 31 st March 2024			

2. Certification Information			
Certificate Number	RSPO 550181	Certificate Start Date	15/04/2021
Date of First Certification	15/04/2011	Certificate Expiry Date	14/04/2026
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 type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	30 mt/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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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)
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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 690368	MS 2530-3:2013 (MSPO Part 3) – General principles for oil palm plantations and organised smallholders	BSI Services (M) Sdn. Bhd.	13/03/2028
MSPO 682049	MS 2530-4:2013 (MSPO Part 4) – General principles for palm oil mills	BSI Services (M) Sdn. Bhd.	13/03/2028
MSPO 714128	MSPO SCCS: 2018	BSI Services (M) Sdn. Bhd.	31/07/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Kerayong Palm Oil Mill	Jalan Bukit Kerayong, 45600 Kapar, Selangor	3° 11' 11.94" N	101° 22' 25.21" E
Bukit Kerayong Estate	Jalan Bukit Kerayong, 45600 Kapar, Selangor	3° 10' 31.04" N	101° 20' 55.00" E
Bukit Cheraka Estate	Jalan Simpang 3, 45800 Jeram, Selangor	3° 13' 37.31" N	101° 21' 56.74" 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
Bukit Kerayong Estate	2,325.85	3.00	211.30	2,540.15	91.56%
Bukit Cheraka Estate	3,400.65	55.52	*191.18	3,647.35	93.23%
Total	5,726.50	58.52	402.48	6,187.50	92.55%
Note: *Bkt Cheraka Estate – a reduction by 3.27 ha due to Precise Agriculture Unit R&D surveyed conducted in November 2023					

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		

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Bukit Kerayong Estate	89.32	1,363.11	873.42	0.00	2,236.53	89.32
Bukit Cheraka Estate	276.40	1,556.61	1,567.64	0.00	3,124.25	276.40
Total (ha)	365.72	2,919.72	2,441.06	0.00	5,360.78	365.72
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 (Apr 2023 – Mar 2024)	Actual (Feb 2023 – Jan 2024)		Forecast (Apr 2024 – Mar 2025)
		Previous license period (Feb 2023 – Mar 2023)	Current license period (Apr 2023 – Jan 2024)	
Bukit Kerayong Estate	37,506.00	6,320.64	19,008.33	46,697
Bukit Cheraka Estate	64,442.00	8,299.06	11,090.30	69,884
Total	101,948.00	44,718.33		116,581.00

Note: Low actual production due Bukit Kerayong POM was in the process of shutting down and crop was divert to Tennamaram POM. The low production also affected from harvester to area ratio, rain fall pattern and consideration of prime age of the OP.

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Apr 2023 – Mar 2024)	Actual (Feb 2023 – Jan 2024)		Forecast (Apr 2024 – Mar 2025)
		Previous license period (Feb 2023 – Mar 2023)	Current license period (Apr 2023 – Jan 2024)	
East Estate		0.00	113.22	
Sepang Estate		79.35	158.28	
Sg Buloh Estate		19.32	115.83	
West Estate		0.00	33.30	
Tennamaram Estate		0.00	35.53	
Total		554.83		18858.64

Note: Certified FFB was received from sister estate under Sime Darby Plantation Berhad which RSPO Certified. Refer TBP.

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

Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Apr 2023 – Mar 2024)	Actual (Feb 2023 – Jan 2024)		Forecast (Apr 2024 – Mar 2025)
		Previous license period (Feb 2023 – Mar 2023)	Current license period (Apr 2023 – Jan 2024)	

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Outside Crop Provider (OCP)	-	3,359.90	14,724.17	-
Total	-	18,084.07		-

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	Feb 2023	7,512.32	1,938.02	9,450.34
2	Mar 2023	7,206.05	1,421.88	8,627.93
3	Apr 2023	2,697.11	2,807.99	5,505.10
4	May 2023	4,265.13	3,747.61	8,012.74
5	Jun 2023	1,819.93	1,992.98	3,812.91
6	July 2023	5,497.96	1,385.96	6,883.92
7	Aug 2023	8,577.84	1,511.51	10,089.35
8	Sept 2023	1,215.81	1,377.85	2,593.66
9	Oct 2023	644.13	739.60	1,383.73
10	Nov 2023	725.47	586.46	1,311.93
11	Dec 2023	2,885.96	574.21	3,460.17
12	Jan 2024	2,225.45	0.00	2,225.45
TOTAL		45,273.16	18,084.07	63,357.23

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Apr 2023 – Mar 2024)	Actual (Feb 2023 – Jan 2024)		Forecast (Apr 2024 – Mar 2025)
	Previous license period (Feb 2023 – Mar 2023)	Current license period (Apr 2023 – Jan 2024)	
FFB	FFB		FFB
101,948.00 mt	14,718.37 mt	30,554.79 mt	116,581.00 mt
	TOTAL	45,273.16 mt	
CPO (OER: 19.90%)	CPO (OER: 18.52 %)		CPO (OER: 19.00%)
20,287.65 mt	2,756.48 mt	5,629.30 mt	22,150.39 mt
	TOTAL	8,385.78 mt	
PK (KER: 4.80%)	PK (KER: 4.28 %)		PK (KER: 4.50%)
4,077.92 mt	698.04 mt	1,238.02 mt	5,246.15 mt
	TOTAL	1,936.06 mt	

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Note: Low actual FFB production due Bukit Kerayong POM was in the process of shutting down and crop was divert to Tennamaram POM. The low production also affected from harvester to area ratio, rain fall pattern and consideration of prime age of the OP.

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

No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Feb 2023	1,393.87	339.54
2	Mar 2023	1,362.61	358.50
3	Apr 2023	528.08	131.90
4	May 2023	785.95	209.30
5	Jun 2023	331.72	87.83
6	July 2023	1,015.35	65.87
7	Aug 2023	1,578.79	417.24
8	Sept 2023	217.39	54.47
9	Oct 2023	120.13	32.34
10	Nov 2023	129.64	34.39
11	Dec 2023	531.02	112.55
12	Jan 2024	391.23	92.13
TOTAL		8,385.78	1,936.06

11. Summary of Actual Volume sold

Current License period (Apr 2023 – Jan 2024)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0.00	0.00	0.00	867.62	867.62
PK (MT)	170.38	0.00	0.00	390.75	561.13
Credits	0	0	0	0	0

Previous License period (Feb 2023 – Mar 2023)

CPO (MT)	0.00	0.00	0.00	523.71	523.71
PK (MT)	0.00	0.00	0.00	91.87	91.87
Credits	0	0	0	0	0

Note.

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Buyer A	TR-XXXXXXXX-XXXX	0.00	170.38
TOTAL			0.00	170.38
Note: Data is consolidated, and each transaction were verified against PalmTrace				

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
-	-	-	-	-
TOTAL			-	-

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Buyer B	1,391.33	482.62
TOTAL		1,391.33	482.62
Note: Removal has been made as verified with palm Trace.			

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
-	-	-	-
TOTAL			-

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (N/A)			Actual (N/A)			Forecast (N/A)		
	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			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

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)
-	-	-	-	-	-	-
TOTAL		-	-	-	-	-
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 (-)							
Credits				-	-	-	-
Physical	-	-	-				
Previous License period (-)							
Credits				-	-	-	-
Physical	-	-	-				

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)
-	-	-	-	-	-	-	-
TOTAL			-	-	-	-	-
Note:							

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.

Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639

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

Website: www.bsigroup.com

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 **19/02/2024 – 22/02/2024**. 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 on-site assessment was conducted on **25/04/2024**. 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. RSPO P&C 2018 for Production of Sustainable Palm Oil 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 Units 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.

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 (Recertification 2)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Bukit Kerayong Palm Oil Mill	✓	✓	✓	✓	✓
Bukit Kerayong Estate	✓	✓	✓	✓	✓
Bukit Cheraka Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: February 17, 2025 - February 20, 2025

Total Number of Mandays: 9.5 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Nor Halis Abu Zar (NHA)	Team Leader	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma In Plantation and Industry Management from UiTM in 2009.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS2530:2013 and RSPO Auditor for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed RSPO P&C Lead Auditor Course in Oct 2020, Refresher RSPO P&C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in December 2021, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 & ISO 14001:2015) Lead Auditor Course, HCV & HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, MSPO SCCS Auditor in February 2019 and also trained in</p>

		<p>SMETA Requirement Training on May 2021 & ISH Training by RSPO in August 2023</p> <p>Language proficiency: 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>
<p>Mohd Amirul Saifullah Mohamad Senan (MAS)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor of Agricultural Science from Universiti Putra Malaysia.</p> <p>Work Experience: With over 6 years of experience in oil palm plantation operations, agriculture, safety, and health-related fields, he has been an integral part of a large publicly listed plantation organization since 2012. His job responsibilities include supervising and monitoring estate operations to ensure compliance with RSPO, ISCC, and MSPO requirements and regulations, Good Agricultural Practice, and other standard operating procedures. He has also actively participated in internal audits of plantation operations to ensure adherence to RSPO, ISCC, and MSPO requirements.</p> <p>Subsequently, he spent 6 years working with an international Certification Body (CB), conducting certification audits of plantation operations for compliance with RSPO, MSPO, and ISCC requirements. He is a qualified Lead Auditor for RSPO P&C, RSPO Supply Chain, ISCC, MSPO OPMC, and MSPO Supply Chain certification audits, as well as a qualified Auditor for ISO 9001:2015 certification audits. Since January 2019, he has conducted audits in various countries, including Malaysia, Indonesia, Cambodia, Thailand, Singapore, Japan, India, Germany, and Spain. His expertise extends to the Palm Oil sector, encompassing industry fundamentals such as good agricultural practices (GAP), best management practices (BMP), sustainability, social issues (e.g., worker welfare and employment terms, gender issues), occupational health and safety (OHS) matters, and environmental considerations (e.g., pollution control and resource conservation).</p> <p>Training attended: Attended, completed and passed ISO 9001:2015 Lead Auditor Course (CQI-IRCA certified), ISO 45001:2018 Lead Auditor Course (CQI-IRCA certified), RSPO P&C Lead Auditor Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification Training Course (endorsed by RSPO Secretariat), RSPO P&C 2018 Version Introduction Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification Update Course (endorsed by RSPO Secretariat), MSPO Lead Auditor Course (endorsed by MPOCC), MSPO Supply Chain Certification Training Course (endorsed by MPOCC), ISCC EU and PLUS Basic Training, ISCC Greenhouse Gas Training, ISCC Waste and Residues Training, SA8000 Introduction & Basic Auditor Course, HCV-HCSA Assessor Training Course & ISH Training by RSPO in March 2022.</p> <p>Language proficiency: Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p>

		<input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
Ahmad Ruffi Bin Abu Talib Khan (ARK)	Team Member	<p>Education: Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015</p> <p>Work Experience: He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years' experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering all over Malaysia</p> <p>Training attended: He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course.</p> <p>Language proficiency: Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: <input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system) </p>

Accompanying Persons:

Name	Role
-	-

2.3 Assessment Plan

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

Date	Time	Subjects	NHA	MAS	ARK
Sunday 18/02/2024	-	Audit Team Travel to Hotel	√	√	√
Monday 19/02/2024	0830 - 0900	Opening Meeting: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).	√	√	√

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Date	Time	Subjects	NHA	MAS	ARK
Bukit Kerayong Estate	0900 - 1200	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, waste management, worker housing, clinic, Landfill etc. Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)	✓	✓	✓
	1230 - 1330	Lunch Break	✓	✓	✓
	1330 - 1630	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 20/02/2024 Bukit Cheraka Estate	0830 - 1230	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, waste management, worker housing, clinic, Landfill etc. Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)	✓	✓	✓
	1230- 1330	Lunch Break	✓	✓	✓
	1330 - 1630	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	✓	✓	✓

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Date	Time	Subjects	NHA	MAS	ARK
Wednesday 21/02/2024 Bukit Kerayong POM	0830 - 1230	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc. Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)	✓	✓	✓
	1230 - 1330	Lunch Break	✓	✓	✓
	1330 - 1600	Document review P1 – P7: 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.	✓	✓	✓
	1600 - 1700	Audit Team Discussion and Closing Meeting	✓	✓	✓
Thursday 22/02/2024 Bukit Kerayong POM	0830 – 1130	Supply chain requirements for POM <ul style="list-style-type: none"> • SCCS Module • Internal Audit • Outsourcing activities • Purchasing and Goods In • Sales and Goods Out - Outsourcing Activities • Record keeping - Extraction Rate • Processing • Registration of transaction – Claims • Rules on market communication and claim 	✓	-	-
	1130 – 1230	Closing Meeting	✓	-	-

Major NC Close Out

Date	Time	Subjects	NHA
Wednesday 24/04/2024	-	Auditor Travel to Hotel	✓
Tuesday	-	Auditor Travel to Site	✓

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Date	Time	Subjects	NHA
25/04/2024 Bukit Kerayong POM Bukit Cheraka Estate Bukit Kerayong Estate	0900 - 1200	Soft Opening Meeting: <ul style="list-style-type: none"> Verification on previous Major NC: <ul style="list-style-type: none"> 2459582-202402-M1 2459582-202402-M2 2459582-202402-M3 2459582-202402-M4 2459582-202402-M5 2459582-202402-M6 Site observation, workers interview (individual and group session) if necessary Document review – implemented evidence 	√
	1200 - 1300	Lunch Break	√
	1300 - 1600	Continue of verification	√
	1600 - 1700	Closing Meeting	√

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?	Sime Darby Plantation Berhad 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, Sime Darby Plantation Berhad 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): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-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, Sime Darby Plantation Berhad 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 Sime Darby Plantation Berhad 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. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	There are no new acquisitions. There is new propose on 2024 for Land legalization still in progress dated approval by RSPO on 13 Julai 2023 for these Estate. 1. Ladang Panjang Estate-1,796.19 ha 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)- 4,071.76ha 6. Karya Palma Estate (PT SNP)-476.70 Ha West and East Estate- 1,452.93 ha	Complied

Any deviations from the maximum periods requires approval by the RSPO Secretariat.	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.	Complied
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>Indonesia - 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> <p>Malaysia - 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> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: 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): www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations.</p> <p>ACOP 2020 has been cross-referenced as below: www.rspo.org/members/29</p>	Complied
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 and approved by the RSPO Secretariat on 13/07/2023 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> <ol style="list-style-type: none"> 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/ 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/ 3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/ 4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/ 5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/ 6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/ 7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website 	Complied

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	<p>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> <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 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</p>	Complied

	<p>Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of August 2023, 16 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO.</p> <p>As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, 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>Sime Darby Plantation Berhad 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>Sime Darby Plantation 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 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>	Complied
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>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. The last audit was conducted in July 2022. 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 SDP 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</p>	Complied

	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.	
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?	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.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company	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.	Not applicable as there are no scheme smallholders or scheme outgrowers under the certification unit.	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	19-20 July 21				
	Malaysia	Anak Kulim Estate	1,523.35	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Somme Estate	941.56	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Padang Buluh Estate	4,008.47	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Jentayu Estate	2,178.59	Certified	Not Applicable	12-Aug-10	19-20 July 21				
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Chersonese Estate	3,293.72	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Kalumpang Estate	2,716.80	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Tali Ayer Estate	3,756.10	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Holyrood Estate	1,332.74	Certified	Not Applicable	5-Oct-11	19-20 July 21				
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	Not Applicable	18-Jun-11	19-20 July 21				
	Malaysia	Kamuning Estate	3,888.43	Certified	Not Applicable	18-Jun-11	19-20 July 21				
	Malaysia	Elphil Estate	1,865.43	Certified	Not Applicable	18-Jun-11	19-20 July 21				
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	Not Applicable	18-Jun-11	19-20 July 21				
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Flemington Estate	1,906.84	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Bagan Dato Estate	3,781.86	Certified	Not Applicable	5-Oct-11	19-20 July 21				

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	Malaysia	Sabak Bernam Estate	2,511.79	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Sg. Samak Estate	3,025.74	Certified	Not Applicable	5-Oct-11	19-20 July 21				
Seri Intan/Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Selaba Oil Mill	1,549.75	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Sabrang Estate	3,945.23	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Sogomana Estate	2,214.08	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Sg. Wangi Estate	2,226.66	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Bikam Estate	2,075.16	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	Not Applicable	3-Mar-11	19-20 July 21				
Tennamaram	Malaysia	Tennamaram Estate	1,981.60	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Bukit Talang Estate	3,572.44	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Bukit Benut Oil Mill	6,346.90	Certified	Not Applicable	15-Apr-11	19-20 July 21				
Bukit Kerayong	Malaysia	Bukit Benut Estate	2,699.28	Certified	Not Applicable	15-Apr-11	19-20 July 21				
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	Not Applicable	15-Apr-11	19-20 July 21				
	Malaysia	East Oil Mill	10,902.94	Certified	Not Applicable	19-May-10	19-20 July 21				
East	Malaysia	East Estate	5,634.45	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Sepang Estate	2,092.28	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Dusun Durian Estate	3,176.21	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia										

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West	Malaysia	West Oil Mill	5,912.69	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	West Estate	5,912.69	Certified	Not Applicable	19-May-10	19-20 July 21				
Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	Not Applicable	7-Jul-11	19-20 July 21				
Kerdau	Malaysia	Kerdau Oil Mill	13,781.50	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Kerdau Estate	5,683.04	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Mentakab Estate	3,266.49	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Chenor Estate	2,834.98	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Sg Mai Estate	1,996.99	Certified	Not Applicable	7-Jul-11	19-20 July 21				
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Jabor Estate	2,332.92	Certified	Not Applicable	7-Jul-11	19-20 July 21				
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Labu Estate	4,529.72	Certified	Not Applicable	30-Dec-11	19-20 July 21				
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Tanah Merah Estate	4,341.73	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	Not Applicable	19-May-10	19-20 July 21				
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	Not Applicable	18-Feb-14	19-20 July 21				
	Malaysia	Sua Betong Estate	2,870.75	Certified	Not Applicable	18-Feb-14	19-20 July 21				
	Malaysia	Sengkang Estate	2,831.51	Certified	Not Applicable	18-Feb-14	19-20 July 21				
	Malaysia	Bradwall Estate	3,828.34	Certified	Not Applicable	18-Feb-14	19-20 July 21				
	Malaysia	PD Lukut Estate	1,523.79	Certified	Not Applicable	18-Feb-14	19-20 July 21				
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	Not Applicable	18-Feb-14	19-20 July 21				

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	Malaysia	Sg. Bahru Estate	1,427.31	Certified	Not Applicable	18-Feb-14	19-20 July 21				
	Malaysia	Salak Estate	3,868.86	Certified	Not Applicable	18-Feb-14	19-20 July 21				
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Muar River Estate	1,584.62	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Kok Foh Estate	2,275.84	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	St. Helier Estate	1,992.65	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Pertang Estate	1,052.49	Certified	Not Applicable	7-Jul-11	19-20 July 21				
Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	Not Applicable	20-May-10	19-20 July 21				
	Malaysia	Kempas Estate	4,505.45	Certified	Not Applicable	20-May-10	19-20 July 21				
	Malaysia	Tangkah Estate	2,537.78	Certified	Not Applicable	20-May-10	19-20 July 21				
	Malaysia	Kemuning Estate	2,671.05	Certified	Not Applicable	20-May-10	19-20 July 21				
	Malaysia	Serkam Estate	2,114.23	Certified	Not Applicable	20-May-10	19-20 July 21				
Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Welch Estate	1,447.82	Certified	Not Applicable	5-Oct-11	19-20 July 21				
Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	Not Applicable	28-Jan-14	19-20 July 21				
	Malaysia	Pagoh Estate	2,325.93	Certified	Not Applicable	28-Jan-14	19-20 July 21				

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	Malaysia	Lanadron Estate	1,964.44	Certified	Not Applicable	28-Jan-14	19-20 July 21				
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	Not Applicable	28-Jan-14	19-20 July 21				
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	Not Applicable	18-Nov-10	19-20 July 21				
	Malaysia	Chaah Estate	2,795.36	Certified	Not Applicable	18-Nov-10	19-20 July 21				
	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	Not Applicable	18-Nov-10	19-20 July 21				
	Malaysia	North Labis Estate	3,532.91	Certified	Not Applicable	18-Nov-10	19-20 July 21				
Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Gunung Mas Estate	3,466.17	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Yong Peng Estate	2,975.41	Certified	Not Applicable	19-May-10	19-20 July 21				
Bukit Benut	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Bukit Benut Estate	2,799.78	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	CEP Nyior Estate	1,955.19	Certified	Not Applicable	5-Oct-11	19-20 July 21				
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Ulu Remis Estate	2,598.25	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Cenas Estate	1,974.06	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Bukit Badak Estate	3,234.25	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Pekan Estate	3,258.70	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Sembrong Estate	1,778.88	Certified	Not Applicable	11-Apr-11	19-20 July 21				

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Bukit Kerayong	Malaysia	Bukit Kerayong Oil Mill	11,371.82	Certified	Not Applicable	29-Mar-11	19-20 July 21				
	Malaysia	Sri Pulai Estate	2,049.87	Certified	Not Applicable	29-Mar-11	19-20 July 21				
	Malaysia	Kulai Estate	3,023.42	Certified	Not Applicable	29-Mar-11	19-20 July 21				
	Malaysia	Layang Estate	3,258.90	Certified	Not Applicable	29-Mar-11	19-20 July 21				
	Malaysia	CEP Renggam Estate	3,039.63	Certified	Not Applicable	29-Mar-11	19-20 July 21				
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	Not Applicable	1-Oct-08	19-20 July 21				
	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	Not Applicable	1-Oct-08	19-20 July 21				
	Malaysia	Tunku Estate	3,199.05	Certified	Not Applicable	1-Oct-08	19-20 July 21				
	Malaysia	Tigowis Estate	2,074.02	Certified	Not Applicable	1-Oct-08	19-20 July 21				
	Malaysia	Sentosa Estate	3,545.54	Certified	Not Applicable	1-Oct-08	19-20 July 21				
	Malaysia	Segaliud Estate	4,820.13	Certified	Not Applicable	1-Oct-08	19-20 July 21				
Melalap	Malaysia	Melalap Oil Mill	5246.18	Certified	Not Applicable	21-Jan-11	19-20 July 21				
	Malaysia	Melalap Estate	2,096.73	Certified	Not Applicable	21-Jan-11	19-20 July 21				
	Malaysia	Sapong Estate	3,149.45	Certified	Not Applicable	21-Jan-11	19-20 July 21				
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Binuang Estate	3,271.08	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Sungang Estate	3,407.98	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Tingayu Estate	1,881.08	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	Not Applicable	16-Jan-09	19-20 July 21				
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Giram Estate	4,166.98	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Mostyn Estate	4,178.04	Certified	Not Applicable	16-Jan-09	19-20 July 21				

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Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Merotai Estate	3,052.66	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Imam Estate	3,773.56	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Tiger Estate	2,497.86	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Table Estate	2,221.63	Certified	Not Applicable	16-Jan-09	19-20 July 21				
Lavang	Malaysia	Lavang Oil Mill	24,836.54	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Lavang Estate	4,363.83	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Rasan Estate	3,454.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Belian Estate	2,847.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Kelida Estate	2,460.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Lavang (Special) Estate	included under Lavang Estate Ha	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Pekaka Estate	2,626.14	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Ruai Estate	2,460.96	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Dulang Estate	2,548.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Charquest Estate	1,448.71	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Paroh Estate	2,627.90	Certified	Not Applicable	30-Dec-11	19-20 July 21				
Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Rajawali Estate	6,087.27	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Samudera Estate	3,308.60	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Semarak Estate	2,248.68	Certified	Not Applicable	30-Dec-11	19-20 July 21				

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	Malaysia	Bayu Estate	2,459.90	Certified	Not Applicable	30-Dec-11	19-20 July 21				
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Derawan Estate	2,490.79	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Sahua Estate	2,644.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Takau Estate	2,107.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Damai Estate	2,287.04	Certified	Not Applicable	30-Dec-11	19-20 July 21				
Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Tetere Estate	2,947.79	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	Not Applicable	18-Mar-11	19-20 July 21				
Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Giligili Estate	1,095.47	Certified	Not Applicable	15-Feb-13	19-20 July 21				

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	PNG	Hagita Estate	2,450.02	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Waigani Estate	2,341.13	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Sagarai Estate	2,864.55	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Padipadi Estate	4,517.67	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Mariawatte Estate	1,680.14	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Smallholders - East Gurney Estate (259)	450.59	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Smallholders - West Gurney Estate (231)	479.13	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Smallholders - East Sagarai Estate (156)	283.93	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Smallholders - West Sagarai Estate (212)	345.96	Certified	Not Applicable	15-Feb-13	19-20 July 21				
Poliamba (POL)	Papua New Guinea	Poliamba Oil Mill	10,720.53	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Kara Estate	1,032.10	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Nalik Estate	2,666.75	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	West Coast Estate	627.60	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Noatsi Estate	2,064.10	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Madak Estate	1,517.11	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Smallholders -North Division (615)	1,022.12	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Smallholders- South Division (866)	1,257.21	Certified	Not Applicable	19-Mar-12	19-20 July 21				

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	PNG	Smallholders -West Division (309)	533.54	Certified	Not Applicable	19-Mar-12	19-20 July 21				
Ramu Agricultural Industries Ltd (RAIL)	Papua New Guinea	Gusap Mill	14,606.08	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Gusap East (Gusap) Estate	2,856.45	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Gusap West (Paddock) Estate	3,019.09	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Surinam Estate	2,154.14	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Dumpu Estate	2,254.36	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Ngaru Estate	854.33	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	J Estate (Jephcott) Estate	2,824.01	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Smallholders - Madang VOPs (71)	360.00	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Smallholders - Morobe VOPs (253)	283.70	Certified	Not Applicable	5-Aug-10	19-20 July 21				
Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill		Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Mamba Oil Mill		Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Embi Estate	1,737.78	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Ambogo Estate	2,040.00	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Sangara Estate	1,780.00	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Sumbiripa Estate	2,545.00	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Mamba Estate	4,013.10	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Sambogo Estate	2,637.85	Certified	Not Applicable	1-Feb-13	19-20 July 21				

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	PNG	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	Not Applicable	1-Feb-13	19-20 July 21				
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Kumbango Oil Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Kapiura Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Numundo Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Waraston Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Bebere Estate	2,226.71	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Kumbango Estate	2,610.80	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Togulo Estate	1,509.20	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Dami Estate	1,507.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Waisisi Estate	1,090.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Kautu Estate	4,280.60	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Karassu Estate	2,387.64	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Moroa Estate	848.16	Certified	Not Applicable	10-Sep-08	19-20 July 21				

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PNG	Bilomi Estate	2,011.70	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Loata Estate	562.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Haella Estate	4,220.30	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Garu Estate	3,709.60	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Daliavu Estate	2,484.10	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Sapuri Estate	2,180.90	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Malilimi Estate	3,837.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Rigula Estate	3,720.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Nomundo Estate	2,645.17	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Lolokoru Estate	2,453.10	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Ove Estate	3,541.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Tamare Estate	1,362.70	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Smallholders LSS Mosa (1822)	5,008.53	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Smallholders VOP East (1817)	5,324.37	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Smallholders VOP Central (1964)	5,756.57	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Smallholders VOP West (1279)	2,804.10	Certified	Not Applicable	10-Sep-08	19-20 July 21				

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	PNG	Smallholders LSS Kapiura (551)	551.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Smallholders VOP Kapiura (850)	847.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Smallholders Kaulong/Akami/Pushiki/R epamira/Sakapei (20)	700.37	Certified	Not Applicable	10-Sep-08	19-20 July 21				
Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	Not Applicable	27-Mar-20	19-20 July 21			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	19-20 July 21				
	PNG	Maralumi Estate	2,427.15	Certified	Not Applicable	27-Mar-20	19-20 July 21				
	PNG	Erap Estate	1,237.68	Certified	Not Applicable	27-Mar-20	19-20 July 21				

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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 Six (6) Critical; Zero (0) Minor nonconformities and No of OFI Opportunity For Improvement raised. The Sime Darby Plantation Berhad SOU 7 Bukit Kerayong Palm Oil Mill & Supply Bases Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the Corrective 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 #	2459582-202402-M1	Issued Date	22/02/2024
Due Date	21/05/2024	Closure Date	25/04/2024
Indicator & Category (Critical / Minor)	2.1.1 Critical Major		
Statement of Nonconformity:	Certificate of competence person of CePPOME was expired.		
Requirement Reference:	(C) The Unit of Certification complies with legal requirements		
Objective Evidence:	Based on document verification and interview, it was found there is no competence person available for CePPOME. It was verified the certificate #CePPOME/2318230 for Personnel with NRIC 940704-XX-XXXX was expired (Validity 12/12/2022 until 12/10/2023). The FTR (Field Training Report) report was yet to submit as per verification with management.		
Corrections:	Management will request an extension to the EiMAS to extend FTR period for another 6 months and will submit the FTR by April 2024.		
Root Cause Analysis:	Mill is in the process of shutting down which leads to uncertainty on the decision to renew PIC's cePPOME license.		
Corrective Actions:	1. Monitoring the validity of license and other legal requirement including cePPOME competence person by mill management. 2. To liaise with RHR on competency training update from time to time.		
Assessment Conclusion:	Major NC Close Out 1. Monitoring Has been done on legal requirement using checklist CePPOME palm Oil Mill Effluent. Person In Charge was Assistant Manager. Request on Extension has been request to DOE and FTR Timeframe has been extended until 12/10/2024. Refer Email correspondence dated 18/04/2024. 2. Mill has liase with RHR on Monitoring the licence status using checklist CePPOME-Palm Oil Mill Effluent. 3. Interview with estate management confirmed that correction and corrective action has been implemented. Based on the above evidence, the major non-Conformity is closed effectively on 25/04/2024. Continuous implementation will be further verified in the next assessment.		

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Non-conformity			
NCR Ref #	2459582-202402-M2	Issued Date	22/02/2024
Due Date	21/05/2024	Closure Date	25/04/2024
Indicator & Category (Critical / Minor)	3.8.11 Critical Major		
Statement of Nonconformity:	The changes of new contractors of handling RSPO certified of oil palm products was not informed to CB.		
Requirement Reference:	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.		
Objective Evidence:	Based on verification, it was found the new contractor was appointed to handling CPO Transportation (MX BXXXXXXXX JXXX Sdn Bhd: Validity 22/12/2023 – 21/03/2024 and PXXXXXXXXXX SXX TXXXXXX SXXXX: 07/11/2023 – 06/02/2024) as per email dated 21/12/2023. Verified previous transporter was FXX TXXXXXXXXXX SXXXXXXXXX Sdn Bhd with T/SDPB/PEN/CPO/0720/003. It was not in line with procedure Section 13.6 "The Mill at its next RSPO Audit inform its CB of the names and contact details of any contractor used".		
Corrections:	To immediate inform GSD on the ad-hoc transporter.		
Root Cause Analysis:	Due to termination of previous transporter in October 2023 and selected of new ad-hoc transporter was arranged in November and December 2023 by Group Procurement, Mill Management was inattentive on the requirement and failed to inform/notify the CB prior to the external audit.		
Corrective Actions:	1.GSD to send reminder on the SCCS requirement to all mill. 2.Management to assign the PIC to track any ad-hoc contractor assigned and to verify with the PIC on any ad-hoc transporter on monthly basis.		
Assessment Conclusion:	Major NC Close Out 1. Refer correspondence email by GSD to Mill Management dated 24/04/2024 title Alert on RSPO Supply Chain Related Non Conformities on the SCCS Requirements. 2. Person In charge on to track any ad hoc contractors has been assigned. Refer appointment letter to Admin Officer. Refer letter Person In charge of CPO/PK Ad Hoc Transporter Contractor dated 01/03/2024. Interview conducted found she have good awareness on their responsibilities. 3. Interview with Mill management confirmed that correction and corrective action has been implemented. Based on the above evidence, the major non-Conformity is closed effectively on 25/04/2024. Continuous implementation will be further verified in the next assessment.		

Non-conformity			
NCR Ref #	2459582-202402-M3	Issued Date	22/02/2024
Due Date	21/05/2024	Closure Date	25/04/2024

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Indicator & Category (Critical / Minor)	3.8.16 Critical Major
Statement of Nonconformity:	There is no removal of PK has been made in the RSPO IT Platform for Certified PK sold as conventional.
Requirement Reference:	Registration of Transactions 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. 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.
Objective Evidence:	Based on verification of Mass Balance Record 2023, Pre Audit Info 2024 and CPO and PK Delivery Record sighted availability RSPO Certified CPO and PK sold as conventional, CPO: 523.71 MT and PK: 91.87 MT in the period Feb to Mar 2023 (Previous License Periods). Verification with RSPO IT Platform (Palm Trace), Removal for CPO has been made however there is no evidence of removal has been made for the PK.
Corrections:	Immediate notification to PIC at GTM on alert of the NCR on removal of PK not conducted.
Root Cause Analysis:	The removal for CSPO & CSPK was done separately by different PIC and the consolidation of CSPO volume is from either physical announcement or the credit selling, CSPK only physical sales and mostly ex-mill basis.
Corrective Actions:	1. Centralised the removal process. Puan Merdu / Nisa identified as PIC doing removal for both products to avoid same issue happen again. 2. GSD to send reminder to all mill and GTM on the SCCS requirement.
Assessment Conclusion:	Major NC Close Out 1. Email correspondence has been verified. Refer email dated 01/03/2024 from HQ level to Global Trade Marketing and Mill Management on the NCR on PK Removal for GTM Response. 2. Refer correspondence email by GSD to Mill Management dated 24/04/2024 title Alert on RSPO Supply Chain Related Non Conformities on the SCCS Requirements. 3. Interview with Mill management confirmed that correction and corrective action has been implemented. Based on the above evidence, the major non-Conformity is closed effectively on 25/04/2024. Continuous implementation will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2459582-202402-M4	Issued Date	22/02/2024
Due Date	21/05/2024	Closure Date	25/04/2024
Indicator & Category (Critical / Minor)	6.2.4 Critical Major		

Statement of Nonconformity:	The condition of the surrounding linesite area is unsatisfactory.
Requirement Reference:	(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no 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 (5 years) is allowed to upgrade the infrastructure.
Objective Evidence:	<p>(1) Location: Bukit Kerayong Palm Oil Mill and Bukit Cheraka Estate Section 23 (1) of Employees' Minimum Standards of Housing, Accommodations and Amenities Act 1990 (Act 446) stated:</p> <p>It shall be the duty of the employer of a place of employment where employees and their dependants are provided with housing accommodation to ensure that—</p> <p>(a) the area surrounding the employees' housing is kept clear of undergrowth and maintained in a clean and sanitary condition;</p> <p>(b) the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water;</p> <p>(c) all refuse in the housing site is collected daily and disposed of satisfactorily; and</p> <p>(d) all communal latrines and bathrooms are kept in a clean, sanitary and working condition.</p> <p>However, upon conducting a site visit in the linesite area, it was observed that there are domestically generated wastes such as plastic bottles, used mattresses, and food containers/wrappers that are not being appropriately managed/disposed. Stagnant water was also noted in perimeter drains, and undergrowth grass was observed growing in both perimeter and main drains. These observations are contravening the stipulations outlined in Section 23 (1) of Act 446.</p> <p>(2) Location: Bukit Cheraka Estate Workers Housing Management Procedure 2022 Section 4.1.9 states "Employees are responsible in maintaining good house cleanliness and hygiene including prohibition to open burning, chemical spraying, wildlife keeping". However, during site visit at the linesite area, two instances of open burning activities were identified – one behind a house and another at the designated waste collection point before the local authorities' collection. These activities are not aligned with Workers Housing Management Procedure 2022 Section 4.1.9.</p>
Corrections:	<ol style="list-style-type: none"> 1. The OU Manager and the PIOA (HA/MA) will do full inspection within three days to identify the areas that need immediate cleaning and repair. A plan will be developed to address the findings based on criticality. 2. To brief the PIOA (HA/MA), VMO and EWC on the requirement related to weekly inspection as per SOP, requirement under Act 446 and checklist. 3. To immediately revert the form currently used from typed/digital form to physical form (filled in physically/manually). 4. Refresher briefing to workers on utilizing OPP reporting and understanding to ensure complaints related to Housing (drainage condition) is promptly addressed to.

Root Cause Analysis:	<p>1. The current way of recording the finding (type in the office after the inspection) is not reflecting the actual condition as the PIC could missed some of the issues that need to be addressed.</p> <p>2. As per Workers Housing Management Procedure, VMO is responsible to conduct inspection and assessment of workers housing complex and amenities together with PIOA (HA/MA) however their roles were not executed effectively.</p>
Corrective Actions:	<p>1. EWC to review if assigning just one MA to inspect the entire estate once a week is practical.</p> <p>2. Establishing inspection roster /schedule for the identified PIOA (HA/MA) to ensure the task given is manageable.</p> <p>3. To regularly enforce the condition set in the house rules, OPP reporting and conduct gotong-royong activity to inculcate the awareness among the workers, by updating OUs' Social Management Plans.</p> <p>4. The findings from the inspection are translated into plan to address and categorise outcome/issue identified based on criticality and urgency, and for discussion in EWC meetings.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> MA has been appointed based on division. Refer appointment letter dated 18/03/2024 to MA assigned to Bukit Cloh and Braunston Division and Field officer to Main Division. Refer appointment letter titled Person In Charge Of Accommodation (PIOA). Inspection roster has been established. Refer Housing Inspection Schedule (PIOA, VMO, EWC) FY 2024. Refresher briefing has been made on 25/03/2024 at Bukit Kerayong POM and 05/03/2024 at Bukit Cheraka Estate. Sighted evidence of training materials, attendance and photos. Social Management Plan has been updated. Refer section OPP Housing Repair FY 2024. Monitoring has been made on quarterly basis. Employee Welfare Committee (EWC) Meeting has been conducted on 30/03/2024 at Bukit Cheraka Estate and 08/03/2024 at Bukit Kerayong POM discussed matters related linesite inspection. Refer Section 1 in the Minutes of meeting. Site visit at Linesite area, found that cleanliness was satisfactory. Some section was in progress and documented in the workplace inspection as per latest report 24/04/2024.. Interview with estate management confirmed that correction and corrective action has been implemented. <p>Based on the above evidence, the major non-Conformity is closed effectively on 25/04/2024. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	2459582-202402-M5	Issued Date	22/02/2024
Due Date	21/05/2024	Closure Date	25/04/2024

Indicator & Category (Critical / Minor)	6.7.3 Critical Major
Statement of Nonconformity:	The process of workers use appropriate PPE is not fully implemented
Requirement Reference:	(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.
Objective Evidence:	<p>Site visit at Bukit Kerayong Palm Oil Mill EFB yard found that contractor were working on top of the lorry covering the EFB with canvas. The contractor was not wearing proper safety harness while working on top of the lorry. Site visit at boiler station found that a worker working at the station without proper PHP.</p> <p>This is not in line with the PPE matrix develop by the mill, which stated that working at height must be equipped with safety harness and workers working at boiler station must be wearing PHP.</p>
Corrections:	<ol style="list-style-type: none"> 1.To immediately brief the contractors to install canvas at dispatch area (AP post) 2. To immediately brief all workers on the requirement on wearing PHP and enforce that PPE to be worn by anyone presence at the site.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Management has not properly utilized the tools made available to identify and act on unsafe acts/ conditions of mills' machineries/ vehicles e.g. pre-Start Checklist, E-SIME+, Refer to : <ol style="list-style-type: none"> a) Generic Safety Procedure UM/HSE/OCP/14 b) E-SIME+ System Procedure UM/HSE/OCP/12 2. Based on the investigation, it was identified that the person is not working from the station and the worker not aware on the requirement of wearing PHP. 3. Insufficient mechanism to check the effectiveness of the Risk Controls of the HIRARC and CHRA.
Corrective Actions:	<ol style="list-style-type: none"> 1. Daily monitoring and weekly review on E-SIME+ System for its effectiveness by mill manager/ assigned personnel. 2. To review, brief and remind Safety & Health Committee on their roles to monitor the implementation of risk controls stated in HIRARC during Safety Committee Meeting. 3. To provide training on PPE to the EFB contractors' driver. 4. To provide refresher training on noise exposure to the workers.
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Monitoring Has been done. Refer e-Sime+ (Mills). Latest inspection was conducted on 21/04/2024. It was verified by the Mill Manager.

	<p>2. Briefing on HIRARC risk control has been communicated in the Safety Meeting dated 08/03/2024. Refer section 7.0. HIRARC has been updated on 08/03/2024 for the Working at Height and Boiler station.</p> <p>3. Training on Working at Height for EFB Contractor Driver has been conducted on 25/03/2024. Hearing Conservation Training has been conducted on 04/03/2024. Sighted evidence of training materials, attendance and photos.</p> <p>4. 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 25/04/2024. Continuous implementation will be further verified in the next assessment.</p>
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Non-conformity			
NCR Ref #	2459582-202402-M6	Issued Date	22/02/2024
Due Date	21/05/2024	Closure Date	25/04/2024
Indicator & Category (Critical / Minor)	7.10.3 Critical Major		
Statement of Nonconformity:	The pollution prevention plan was not fully monitored and implemented		
Requirement Reference:	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.		
Objective Evidence:	During the site visit to the Workshop area of Bukit Kerayong Estate, it was discovered that one unit of Water Pump Engine Trailer was parked there without an oil tray. Additionally, in the Workshop Area of Bukit Cheraka Estate, one unit of Write-off Grabber Tractor also parked without an oil tray. Evidence of soil contamination from leakage was observed for both instances. These findings are inconsistent with the Pollution Prevention Plan 2023/2024, which addresses the issue of leakage or spillage of lubricant fluids from aged vehicles parked at the parking bay. The suggested mitigating measure is to place a tray underneath the vehicles.		
Corrections:	<p>1. Estate had immediately cleared the contaminated soil. These contaminated soils then registered as scheduled waste SW408 - Contaminated soils.</p> <p>2. Immediate action was taken to place a tray underneath the water pump engine trailer and Write-off Grabber Tractor to avoid any potential leakage and spillage.</p>		
Root Cause Analysis:	<p>1. Ineffective workplace inspection due to lack of verification by OSH Committee Chairman</p> <p>2. Insufficient mechanism to check the effectiveness of the pollution prevention plan.</p>		
Corrective Actions:	<p>1. Daily monitoring and weekly review on E-SIME+ System for its effectiveness by estate manager/ assigned personnel</p> <p>2. OSH Committee Chairman to verify workplace inspection conducted by PIC.</p>		

	3. To review Workplace Inspection Checklist to ensure coverage of all stations/ areas in estate operation
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Monitoring Has been done. Refer eSime+ Estate Dashboard Bukit Kerayong and Bukit Cheraka estate dated April 2024. Report has been verified with Person In Charge. 2. Manager has been verified the monitoring done by OSH Coordinator. Refer Workplace Inspection Form dated 16/04/2024. 3. Matters related workplace inspection has been discussed in the OSH Meeting dated 20/03/2024. Refer section 2.0. 4. Updated workplace inspection has been done. Refer item 11.19 including matters related oil leakage. This updating has been discussed in the OSH Meeting dated 20/03/2024. 5. Site verification was conducted found all the machineries parked there equipped with oil tray. 6. Interview with estate management confirmed that correction and corrective action has been implemented. <p>Based on the above evidence, the major non-Conformity is closed effectively on 25/04/2024. Continuous implementation will be further verified in the next assessment.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good cooperation given to the audit team by site and HQ team
PF 2	Good comment and feedbacks from stakeholder as per consultation.

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2311042-202302-M1	Issued Date	16/02/2023
Due Date	17/05/2023	Closure Date	28/03/2023
Indicator & Category (Critical / Minor)	3.6.2 (Major)		
Statement of Nonconformity:	The monitoring of implementation of the Safety and Health Plan was not effective.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		

Objective Evidence:	<p>Bukit Cheraka Estate</p> <p>As per report PRO/JAN/22 (LBC/25) JKPP/2021/11-04/00029, from 25 workers went for test, 1 workers were found with abnormal results and recommended the estate management to appoint OHD to conduct proper medical examination and follow up. However, there is no evidence that the worker were send for examination with OHD.</p> <p>Bukit Kerayong POM</p> <p>During site visit at the Empty Fruit Bunch yard, sighted two pesticides containers inside the shovel cockpit. Noted during interview with the driver, the containers were used to store diesel for shovel fuel. There is no labelling of diesel on the containers.</p> <p>During site visit at CPO Despatch Bay, Bukit Kerayong POM, It was found that there is one unit of IBC Tank containing CPO was placed on the ground and sighted there are leakages oil on the ground. This could lead to potential safety hazards such as slip and fall.</p> <p>The safety issues were not addressed by the management and was not captured during workplace inspection.</p>
Corrections:	<p>Bukit Cheraka Estate</p> <p>The affected employee has been sent for next Audiometric Assessment. To send the affected employees from Audiometric Assessment Report result to Occupational Health Doctor as per recommendation by the report.</p> <p>Bukit Kerayong POM</p> <ol style="list-style-type: none"> 1. To instruct and ensure the contractor to remove the diesel container from their shovel immediately. To immediately conduct briefing session to contractor on chemical handling. <p>Mill to immediately clean up the leakages on the ground at the IBC tank area and to relocate the IBC tank to proper designated area with safety signage.</p>
Root Cause Analysis:	<p>Bukit Cheraka Estate</p> <p>No proper communication or handover of pending task for action discussed in OSH Plan when changes in management personal i.e: resigned or transfer of Assistant.</p> <p>Bukit Kerayong POM</p> <ol style="list-style-type: none"> 1. Contractor is unaware on the requirement of chemical storage as previously, the loading of EFB was carried out by Mill's vehicle, and diesel for heavy machinery was stored inside Mill's skid tank. The current contractor was newly appointed, and no briefing was conducted related to the requirement of chemical storage, especially on diesel. <p>The safety issues were not addressed by the management and was not captured during workplace inspection because no specific checklist for that particular process step.</p>
Corrective Actions:	<p>Bukit Cheraka Estate</p> <ol style="list-style-type: none"> i. Management will assign Medical Assistant and an Assistant Manager to monitor and follow up any upcoming result from Audiometric Assessment Report. ii. To ensure communication with the PIC assign on any handover of pending task to avoid any lapses in future. iii. To include the schedule of Audiometric Assessment and follow up schedule in OSH plan. iv. To ensure the effectiveness of OSH plan implementation by discuss during OSH Meeting.

	<p>Bukit Kerayong Mill</p> <ul style="list-style-type: none"> i. To provide chemical handling training to contractor before any start work. The contractor will bring their own diesel container with proper labelling directly from their workshop to refuel their vehicle at the mill. After refueling, the diesel container will be brought back to the contractor's workshop. ii. To include monitoring of contractor's compliance on chemical handling during workplace inspection. iii. To discuss the effectiveness of workplace inspection on contractor's chemical handling in the OSH Meeting' <p>i. To assess the activity under HIRARC and to include IBC tank as part as workplace inspection.</p> <p>To ensure the effectiveness of OSH plan implementation by discuss during OSH Meeting.</p>
Assessment Conclusion:	<p>Major NC Close Out verification.</p> <p>Sighted and reviewed the evidence as follows:</p> <p>Bukit Cheraka Estate</p> <p>1. Audiometric test</p> <ul style="list-style-type: none"> a. The affected employee has been send for medical examination by OHD with DOSH reg. no. HQ/17/DOC/00/0043 on 22/03/2023. The report will be submitted within one month after the medical examination. b. The estate has appointed the Asst. Manager and Medical Asst. as person responsible to monitor the results of any Risk Assessment, Audiometric Test and Medical Surveillance as per appointment letter dated 30/12/2022 and acknowledge by the person responsible on 05/01/2023 and 10/01/2023 respectively. c. The estate has established Handing/Taking over notes to communicate any pending task to avoid any lapses during changes of person responsible. d. The estate has included Audiometric test and audiometric retest results monitoring in the Safety and Health Plan FY 2023. Reviewed the Safety and Health Plan dated 01/03/2023. d. The estate includes the results of any Risk Assessment, Audiometric Test and Medical Surveillance and recommendation implementation in the Safety and Health Committee meeting agenda. Reviewed the minutes meeting dated 26/01/2023. <p>Bukit Kerayong POM</p> <p>1. Chemical container in contractor shovel</p> <ul style="list-style-type: none"> a. The mill has removed chemical container from the shovel. for current practice the contractor refuel their vehicle at the mill. After refueling, the diesel container will be brought back to the contractor's workshop located outside the mill premise. Sighted during site visit, there is no diesel/ lubricant stored in the shovel. b. The mill has conducted training on Safety Chemical Handling to the Contractor and the Contractors' workers. Reviewed the training attendance and training materials dated 01/03/2023. c. The mill has established Daily Vehicle Inspection checklist which included item no. 21. No Chemical Container in Cockpit. Reviewed the inspection records dated

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	<p>24/03/2023, 25/03/2023 and 27/03/2023. Sighted during site visit, the conditions was consistent with the report.</p> <p>d. The mill also included the monitoring in e-SIME+ system. The system is using QR Code scanning to reports any Unsafe Condition in the mill</p> <p>e. The contractors compliance and Daily Vehicle Inspection results has been included in the Safety and Health committee meeting agenda. Reviewed the minutes meeting dated 09/03/2023.</p> <p>2. IBC tank for CPO storage</p> <p>a. Sighted during site visit, the mill has cleanup and removed the soil at the surrounding area of the IBC tank. The mill has constructed containment bund complete with steps for the IBC tank to ensure ease the filling up process and prevent spillage to the area and cause hazard such as slippery floor. Safety signage "Caution: Slippery Floor" has been displayed at the area.</p> <p>b. The mill has reviewed the HIRARC for CPO and Kernel Storage and Dispatch Station on 09/03/2023 with addition on Transfer/ Sampling CPO from tanker to IBC tank process with risk level recorded at 4.</p> <p>c. The mill has included the IBC tank area in the Workplace Inspection Checklist under section 15: Dispatch Bay. Reviewed the latest workplace inspection reports dated 07/03/2023.</p> <p>d. The mill also included the monitoring in e-SIME+ system. The system is using QR Code scanning to reports any Unsafe Condition in the mill.</p> <p>e. The HIRARC review and Workplace Inspection results has been included in the Safety and Health committee meeting agenda. Reviewed the minutes meeting dated 09/03/2023.</p> <p>The evidences found adequate to address the Major Non-Conformity. Thus, the major NC were effectively closed on 28/03/2023.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>The site visit verification at Bukit Kerayong Palm Oil Mill found that the IBC Tank area is properly maintain, with bund was constructed around the tank to prevent any leaking to contaminate the area and prevent the area from becoming slippery. There was no evidence of oil on the floor.</p> <p>Verification on the wheel loader found that there are no chemical container inside the cabin. Interview with the driver found that the understanding on chemical handling is good.</p> <p>The management of Bukit Cheraka Estate has conducted the audiometric dated 21/12/2023, and the repot were received on 15/02/2024. Found that there are 3 workers were having abnormal audiometric (Not STS). Verification on communication records found the Estate Medical Assistant has followed up thoroughly with the vendor to produce the report. The management has arrange with the OHD to sent the workers for the examination.</p> <p>The records of trainings and workplace inspections were thoroughly examined, and no recurrence of non-conformities was found. As a result, the Major Non-Conformity is remained closed.</p>

Previous Audit Minor Non-conformity			
NCR Ref #	N/A	Issued Date	

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Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: N/A Verification / Follow-up actions: N/A

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1874552-202001-M1	Critical	6.2.3	24/01/2020	10/04/2020
1874552-202001-M2	Critical	3.6.1	24/01/2020	10/04/2020
1874552-202001-N1	Minor	4.2.3	24/01/2020	Closed on 07/01/2021
1874552-202001-N2	Minor	2.2.2	24/01/2020	Escalated to Major NC
1874552-202001-N3	Minor	7.12.7	24/01/2020	Closed on 07/01/2021
1874552-202001-N4	Minor	3.3.2	24/01/2020	Escalated to Major NC
1874552-202001-N5	Minor	6.7.2	24/01/2020	Escalated to Major NC
2007911-202101-M1	Critical	2.2.2	07/01/2021	Closed on 06/04/2021
2007911-202101-M2	Critical	6.7.2	07/01/2021	Closed on 06/04/2021
2007911-202101-M3	Critical	3.3.2	07/01/2021	Closed on 06/04/2021
2007911-202101-M4	Critical	6.7.3	07/01/2021	Closed on 06/04/2021
2007911-202101-N1	Minor	3.4.2	07/01/2021	Closed on 24/01/2022
2007911-202101-N2	Minor	3.5.2	07/01/2021	Closed on 24/01/2022

2007911-202101-N3	Minor	2.1.2	07/01/2021	Closed on 24/01/2022
2156242-202201-M1	Critical	2.1.1	28/01/2022	Closed on 25/04/2022
2156242-202201-M2	Critical	3.4.3	28/01/2022	Closed on 25/04/2022
2156242-202201-M3	Critical	6.2.4	28/01/2022	Closed on 25/04/2022
2156242-202201-N1	Minor	3.7.3	28/01/2022	Closed on 16/02/2023
2156242-202201-N2	Minor	7.3.1	28/01/2022	Closed on 16/02/2023
2311042-202302-M1	Critical	3.6.2	16/02/2023	Closed on 28/03/2023
2459582-202402-M1	Critical	2.1.1	22/02/2024	Closed on 25/04/2024
2459582-202402-M2	Critical	3.8.11	22/02/2024	Closed on 25/04/2024
2459582-202402-M3	Critical	3.8.16	22/02/2024	Closed on 25/04/2024
2459582-202402-M4	Critical	6.2.4	22/02/2024	Closed on 25/04/2024
2459582-202402-M5	Critical	6.7.3	22/02/2024	Closed on 25/04/2024
2459582-202402-M6	Critical	7.10.3	22/02/2024	Closed on 25/04/2024

3.4 Stakeholders and previous land owner / 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 Sime Darby Plantation Berhad SOU 7 Bukit Kerayong Palm Oil Mill and Supply Bases 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)
Contractors	MX MXXXXXX SXX BXX	Face to face
Transporter	FXXX TXXXXX SXX BXX	Face to face
Contractors	BXXXXX MXXX EXXXXXXXX	Face to face
Contractors	RXXX EXXXXXXXX	Face to face
Worker's Representative	R. AXXXXX NXXXXX	Face to face

Gender Committee's Representative	S. YXXXXXXX SXXXXXX	Face to face
Worker's Representative (Foreign)	IXXXXXX	Face to face

Stakeholders' comments	
1	<p>Feedbacks: Contractor</p> <p>The contractor has provided positive feedback regarding the training conducted by management. The training comprehensively covered essential aspects including policy, safety, environmental, and social considerations related to RSPO and MSPO certification.</p> <p>The contractor demonstrated a strong understanding of minimum wage requirements and safety protocols, indicating a positive outcome from the training session.</p> <p>Audit Team verification and response:</p> <p>Management has undertaken stakeholder meetings and diligently documented the minutes of these meetings. Furthermore, contractors have acknowledged their agreement by signing the relevant forms, affirming their understanding and commitment.</p> <p>This proactive approach underscores the company's dedication to compliance and transparency in stakeholder engagements, ensuring that all parties are informed and involved in decision-making processes.</p>
2	<p>Feedbacks: Transporter</p> <p>The transporter has provided positive feedback, stating that payments for all completed work are consistently received within the agreed timeframe without any delays. Moreover, there have been no disputes or disagreements encountered thus far. The transporter regularly submits necessary documents required by certification units, such as monthly workers' payslips demonstrating payment of minimum wages and statutory payments. Additionally, they have been invited to attend stakeholder consultation meetings and are well-informed about Company Policies, Standard Operating Procedures (SOPs), and the grievance procedure.</p> <p>Audit Team verification and response:</p> <p>The audit team has observed that management has effectively conducted stakeholder meetings, facilitating two-way communication between the company and its stakeholders.</p>
3	<p>Feedback: Gender Committee Representative</p> <p>The representative from the Gender Committee provided positive feedback, noting that management has conducted comprehensive training sessions for all employees, encompassing critical areas such as safety, environment, and social considerations. Additionally, it was highlighted that management is supportive of employees joining any trade union, promoting inclusivity and cooperation. This reflects a commitment to employee welfare and empowerment.</p> <p>Audit Team verification and response:</p> <p>The audit team has verified the minutes of the meeting and noted that the Gender Committee conducted a training session among its committee members. This indicates proactive efforts by the committee to enhance awareness and understanding of relevant issues.</p>
4	<p>Feedback: Foreign Workers Representative</p> <p>The foreign workers representative expressed satisfaction with the management's commitment to equal treatment for all employees, devoid of discrimination. Salaries are disbursed in compliance with the Employment Act of 1955 and the latest Minimum Wage Order. Additionally, every employee is afforded the right to join any association of their choice. The estate conducts Social Dialogue Meetings, providing a platform for workers to openly discuss work-related and social matters with management. This open</p>

	dialogue fosters a conducive environment for communication. Moreover, workers are well-informed about the available channels for lodging complaints and grievances.
	Audit Team verification and response: The audit team reviewed payslips for all sampled workers and confirmed that all workers were paid in accordance with legal requirements. No further issues were identified.

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
Not Applicable as the estates have undergone 2 nd cycle of replanting.					

Previous land owner / user comment	
	Feedbacks: N/A
	Audit Team verification and response: N/A



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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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Sime Darby Plantation Berhad SOU 7 Bukit Kerayong Palm Oil Mill and Supply Bases 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 Sime Darby Plantation Berhad SOU 7 Bukit Kerayong Palm Oil Mill and Supply Bases is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: NOR HALIS ABU ZAR	Name: Shylaja Devi Vasudevan Nair
Company Name: BSI SERVICES MALAYSIA SDN BHD	Company Name: SD Guthrie Bhd
Title: CLIENT MANAGER	Title: Head, Sustainability Compliance Unit, Group Sustainability Dept.
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: 26/04/2024	Date: 4/6/2024

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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 -	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 Sime Darby Plantation website.	Complied
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 there is only request for assistance recorded. As per interview, any information request will be recorded in the logbook.	Complied

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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 is 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 held on 23/01/2024. These consultations were attended by various stakeholders representing all operating units under SOU 7 – Bukit Kerayong Palm Oil Mill (POM). 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. This appointment is evidenced by appointment letters issued to the Senior Assistant Manager from the Estate Manager dated 01/01/2022 for Ladang Bukit Kerayong, and for Bukit Cheraka, an appointment letter dated 01/01/2024 has been issued to the Assistant Manager. Similarly, for the Bukit Kerayong Palm Oil Mill, an appointment letter dated 03/01/2023 has been issued to the Assistant Manager.</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,</p>	Complied

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		schools, local communities, CPO/PK customers, etc. Latest update was done in Jan-2024 for each operating unit.	
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	<p>Sime Darby Plantation Berhad has established ethical conduct policy which documented in the document code of business conduct policy that has been signed by Group Managing Director. Stated in the policy that Sime Darby Plantation Berhad uphold 5 core values in all business transaction which are integrity, respect & responsibilities, enterprise and excellence.</p> <p>The latest Group Sustainability & Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC) signed by Group Managing Director on 02/12/2019.</p>	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	<p>Sime Darby Plantation 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 selection. There are some cases that direct awarded</p>	Complied

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		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>Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit continues to comply with all verified legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and HQ. The sampled mill and estates had obtained and renewed license and permits as required by the law. Among others the licenses/permit verified were:</p> <p>Bukit Kerayong Estate</p> <ol style="list-style-type: none"> 1. MPOB Licence #525572002000 valid from 14/02/2024 until 31/12/2024 2. Air Receiver #SL PMT 21473 valid until 03/12/2024 3. Air Receiver Tank #SL PMT 5865 valid until 02/12/2024 4. Weighbridge calibration #A033828 inspected by De Metrology on 15/12/2023 5. Fire Extinguisher inspected and valid until 07/02/2025. <p>Bukit Cheraka Estate</p> <ol style="list-style-type: none"> 1. MPOB Licence #526188002000 valid from 01/02/2024 until 31/01/2025 	Non-compliance

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		<p>2. Deduction permit for electricity #JTKS€ 6/115 Jld 34-10(2) dated 05/02/2018</p> <p>3. Air Receiver Tank #SL PMT 34554 valid until 15/04/2025</p> <p>4. Air Receiver #SL PMT 34552 valid until 15/04/2025</p> <p>5. Air Receiver #SL PMT 34551 valid until 15/04/2025</p> <p>Bukit Kerayong POM</p> <p>1. MPOB Licence #562906004000 valid from 01/08/2023 until 31/07/2024</p> <p>2. Energy Commission Permit #2023/02211 valid until 07/08/2024</p> <p>3. DOE Licence #003124 valid until 30/06/2024</p> <p>4. Weighbridge calibration #D216814 inspected by De Metrology on 21/10/2023</p> <p>5. Boiler #SL PMD 80918 valid until 26/02/2025</p> <p>6. Back Pressure Receiver #SL PMT 3763 valid until 26/02/2025</p> <p>7. Steam Separator #PMT77662 valid until 26/02/2025</p> <p>8. Competence person #CePPOME/2318230 to Assistant Mill Manager NRIC 940704-XX-XXXX</p> <p>9. Competence person #NW-HQ-AGT-0069-V to Assistant Mill Manager NRIC 940704-XX-XXXX valid until 19/02/2025</p> <p>Certificate of competence person of CePPOME was expired.</p> <p>Based on document verification and interview, it was found there is no competence person available for CePPOME. It was verified the certificate #CePPOME/2318230 for Personnel with NRIC 940704-XX-XXXX valid expired (Validity 12/12/2022 until 12/10/2023). The</p>	
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		FTR (Field Training Report) report was yet to submit as per verification with management. Thus, major Nc was raised.	
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>The operating units have maintained compliance with legal requirements through established and implemented documented procedures, as outlined in the Estate/Mill Quality Management System, Level 2: Standard Operating Manual, specifically Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. This mechanism ensures adherence to legal and other requirements and is documented in the EQMS & MQMS (Estate & Mill Quality Management System), which is distributed to all operating units. The GSQM Department and respective operating units are responsible for identifying, managing, updating, and tracking legal requirements, as well as monitoring legal compliance status.</p> <p>Furthermore, all operating units maintain a Legal & Other Requirements Register (LORR) that covers all necessary regulatory requirements. A legal register dated July 2023 lists additional applicable laws, including:</p> <ul style="list-style-type: none"> • Minimum Wages Order 2022 • Fire Service Act 1988 (Act 341) Amendment 2020 • Human Resources Development Act 2001 • Anti-Sexual Harassment Act 2021 • Employees' Social Security (Amendment) Act 2022 • Employees' Insurance System (EIS) (Amendment) Act 2022 • Control of Supplies Act 1961 • Employment (Amendment) Act 2022 	Complied

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2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the sampled estates, during the field inspection confirmed that they were clearly marked and maintained. Trenches were constructed at most areas.</p> <p>Bukit Cheraka Estate</p> <p>Sighted boundary at P2020B neighbouring with Villagers. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p>Bukit Kerayong Estate</p> <p>Sighted boundary at P09A neighbouring with Bukit Cheraka Estate. Other than that, at P14C neighbouring with Industrial Area. Verified that there is no planting beyond these legal or authorised boundaries.</p>	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	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>List of contracted parties are included in the stakeholder lists, which are maintained by each operating unit. The information in the stakeholder lists includes name and addresses of contractors, their contact person and contact numbers.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>All contracts including FFB supplier, contain clauses on specific clauses on meeting applicable legal requirements and demonstrated by the third party. Refer Section 5(A) compliance with applicable Laws and Guidelines. Sighted evidence of legal due diligence of all contractors. Detailed in the Letter of Award to the contractors. Sighted evidence of Contact agreement, employees contract agreement, payslip has been documented and verified. Reviewed the sampled contracts as follows:</p>	Complied

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		<p>(1) KXX Exxxxxxxxx (FFB Transporter): Signed on 01/01/2024, valid until 31/03/2024.</p> <p>(2) RXXX Exxxxxxxxx (Backhoe Service Provider): Signed on 05/01/2024, valid until 31/12/2024.</p> <p>(3) Bxxxx Mxxx Exxxxxxxxx (Grass Cutting Contractor): Signed on 05/01/2024, valid until 30/06/2024.</p> <p>(4) BXXXX Exxxxxxxxx (EFB Loading, Transport & Application Contractor): Signed on 22/01/2024, valid until 31/12/2024.</p> <p>(5) Lxxxx Txx Exxxxxxxxx (Supply Contract Labour for Preventive Maintenance, Corrective Maintenance, and Project): Signed on 16/03/2023, valid until 31/12/2023 + 1 year ("Initial Term").</p> <p>Each contract contains a Vendor Integrity Pledge, underscoring commitment to legal compliance encompassing labor and human rights, environmental health and safety (EHS), ethics, and management practices. Notably, the pledge mandates contractors of Sime Darby Plantation Berhad estates and mills to ensure non-withholding of employee passports and payment of minimum wages.</p> <p>All operating units adhere to the Contractor & Vendor Management Procedures (Ver. No. 0, dated 17/11/2021), established by SDP management. This framework outlines policies and procedures for contractor and vendor selection and performance monitoring. It encompasses processes at both the Group and Operating Unit levels, including contractor classification, selection, kick-off meetings, monthly KPI monitoring, participation in Safety & Health Committees, and Vendor Performance Evaluation.</p> <p>Each operating unit maintains a Contractor Master List, which includes company names and worker details, facilitating diligent</p>	
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		oversight. The due diligence process, conducted on appointed contractors and vendors, is meticulously recorded, ensuring accountability and compliance.	
2.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has established the Vendor Integrity Pledge and Vendor Code of Business Conduct (VCOBC). The VCOBC contains clauses disallowing child, forced and trafficked labour. It can be sighted under:</p> <p>5.7 Eradication of Exploitation - The Group endeavours to eradicate all forms of bonded and forced labour, slavery, human trafficking, and sexual exploitation by implementing International Labour Organisation (ILO) core labour standards and conventions. When supplying labour to perform work for the Group, Vendors shall refrain from using or facilitating any of the following activities:</p> <ul style="list-style-type: none"> • The Vendors' Employees are not charged with recruitment fees for the purpose of restricting free movement. • Original identification documents of the Vendors' Employees such as passport or work permits are not retained involuntarily by Vendors. • Payment of the Employees' salaries are not withheld or delayed beyond the extent permitted by applicable laws and regulations in the countries where the Vendors operate. • In addition, the Vendors shall ensure that recruitment of its Employees and workers are done via legitimate recruitment agencies, which are properly licensed to operate under applicable laws. 	Complied

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		<p>5.8 Abolishment of Child Labor & Protecting the Rights of Children – The Group seeks to promote the well-being of children and safeguard them from any form of maltreatment or exploitation, including but not limited to child sex tourism, child trafficking, and child pornography. As such, Vendors shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate, unless in vocational and/or formal and structured apprenticeship, educational and training programmes.</p> <p>Verified against contractor list, OVR and signed copies of Vendor Integrity Pledge.</p>	
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 • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>The mill has established all the records of all directly sourced FFB. Sample of directly source FFB taken is as following:</p> <ol style="list-style-type: none"> 1. Bxxxt Laxxxg Esxxx – MPOB License No: 6188XXXX2000, Expiry Date: 31/10/2024. Coordinate: 3.260526, 101.551576. 2. Clarxxx Crxxx – MPOB License No: 5026XXXX2000, Expiry Date: 30/04/2024. Coordinate: 101°34'55.60 E, 3°33'26.93" 3. Mexx Estxxe – MPOB License No: 5022XXXX2000, Expiry Date: 30/11/2024, Coordinate: 3.1695555, 101.4602222. <p>All Estate sample are MSPO Certified Estate.</p>	Complied
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>The mill is in the process of gathering information on indirectly sourced FFB, aligning with RSPO Announcement dated 15 February 2022. To fulfill Indicator 2.3.2 of the 2018 RSPO Principles & Criteria, Sime Darby Plantation Berhad submitted a case register to RSPO on 11/11/2022. Challenges include obtaining land ownership evidence, MPOB licenses, and geo-locations for indirect suppliers.</p>	Complied

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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	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The business plan for the mill is reflected in the form of an annual budget (MPLAN) and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget (MPLAN) with 5 years projection (2024 – 2028). The annual budget contains the crop projection and the finance allocation for field operation and administration. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p> <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. In the 5 years business plan include items as follows:</p> <ul style="list-style-type: none"> a) Palm oil mill <ul style="list-style-type: none"> i. Mill intake – FFB input ii. Production of CPO iii. Production of PK iv. Total Palm Oil Extraction v. Total Palm Kernel Extraction vi. Mill cost b) Oil Palm Estate 	Complied

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		<table><tr><td>Bukit Kerayong Estate</td><td>97.23</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>Bukit Cheraka Estate</td><td>95.19</td><td>71.80</td><td>150.02</td><td>204.83</td><td>142.51</td></tr></table>	Bukit Kerayong Estate	97.23	0.00	0.00	0.00	0.00	Bukit Cheraka Estate	95.19	71.80	150.02	204.83	142.51	
Bukit Kerayong Estate	97.23	0.00	0.00	0.00	0.00										
Bukit Cheraka Estate	95.19	71.80	150.02	204.83	142.51										
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit held management reviews at their respective sites on a yearly basis. Among the matters discussed during the management review are as follows: -</p> <ol style="list-style-type: none">1. Introduction by Chairman2. Results of Internal Audits covering RSPO & MSPO3. Customer feedback4. Status up preventive and corrective actions5. Follow up actions from management review6. Changes that could affect the management system7. Recommendations for improvement8. Improvement of the effectiveness of the management system and process9. Resources need <p>The minutes of the meeting indicated that Internal audit findings were each thoroughly examined, and the corrective action plan were discussed. The management review was conducted at the respective operating units as follows:</p>	Complied												

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		<p>Bukit Kerayong POM: 03/11/2023</p> <p>Bukit Kerayong Estate: 09/11/2023</p> <p>Bukit Cheraka Estate: 29/09/2023</p>	
<p>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.</p>			
3.2.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The action plan for continuous improvement within each operating unit of the certification unit is a strategic initiative aimed at enhancing various aspects, particularly focusing on the social impacts of their operations. This involves a more comprehensive approach to consider and address factors such as the welfare of employees and the relationships with key stakeholders.</p> <p>Sample of Continuous Improvement Plan are as following:</p> <ol style="list-style-type: none"> 1. Intensive planting of beneficial plant 2. Rat baiting training 3. Fixing the barl owl box to achieve target ratio of 1:10 ha 4. To achieve harvester ration of 1:18 ha 5. Monitoring of estate quarters for cleanliness 6. Zero loose fruit campaign 7. Maximise the mechanization for estate operations 	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p>	<p>The RSPO metric template version 2.1 is employed for reporting the metrics of Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit, encompassing economic, social, and environmental aspects. The data reporting period spans from January to December 20223 for social and environmental metrics,</p>	Complied

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	<p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>and for economic metrics, it covers January 2023 to December 2023, counting back from the audit month. Following a verification process with the input data, no discrepancies were identified in the reported data for all metrics during the specified period.</p>	
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) for the estate and mill has been established. Sime Darby SOP issued dated 02/01/2008 and Agricultural Reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU 7 Bukit Kerayong as a guidance document to conduct estate operation. The estate also holds the Safety Work Procedure. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Palm Mill holds two SOPs: Sustainable Plantation Management System (SPMS) version 1 dated 1/11/2008 and Mill Quality Management System version 1 dated 1/11/2008 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, Sime Darby has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. Sime Darby continuously updated the SOP established. Among the updated SOP FY 2023 as follows:</p> <ol style="list-style-type: none"> 1. UM HSE Management System Manual, UM/HSE/MS/01 	Complied

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		<ol style="list-style-type: none"> 2. First Aid in Workplace Procedure, UM/HSE/OCP/01 3. Safety Harvesting Procedure, UM/HSE/OCP/02 4. Personal Protective Equipment Procedure, UM/HSE/OCP/03 5. Chemical Safety Management Procedure, UM/HSE/OCP/04 6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05 7. OSH Risk Management Procedure, UM/HSE/SE/01 <p>Sime Darby Plantation Berhad has established the procedure for estate operations. te has established the Safe Operating Procedure (SOP) for all estate operation, specifically for each work. Sample of estate SOP sighted is as the following:</p> <ol style="list-style-type: none"> 1. General Guidelines, Lightning Safety 2. General Guidelines, Chemical Storage And Disposal 3. General Guidelines, Workshop Safety 4. Trunk Injection 5. Circle Weeding 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The management of Sime Darby Plantation Berhad has the Mechanisation Upstream Malaysia Monitoring report dated 21/06/2023, Structured Oil Recovery Assessment, Structured Crop Recovery Assessment, and Mature Upkeep Assessment dated 09-18/10/2023 for SOU 07 Bukit Kerayong POM.</p> <p>Bukit Kerayong Palm Oil Mill has conducted the Internal Audit to check the implementation of SOP. The mill has conducted the Internal Audit on 21/09/2023. Sighted the Internal Audit Report together with the non-conformities correction and corrective action. The internal audit was conducted by the Group Sustainability</p>	Complied

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		<p>Department (GSD). Two Major NC, Two Minor NC, and One OFI were raised. All closed.</p> <p>Bukit Kerayong Estate has conducted the Internal Audit on 20/09/2023. The internal audit was conducted by the Group Sustainability Department. The Internal Audit process is the mechanism to check the implementation of SOPs, together with monthly occupational safety and health check that will check the operation on the safety requirement. Four minor conformities were raised. All closed.</p> <p>Bukit Cheraka Estate has conducted the Internal Audit on 19/09/2023. The internal audit was conducted by the Group Sustainability Department. The Internal Audit process is the mechanism to check the implementation of SOPs, together with monthly occupational safety and health check that will check the operation on the safety requirement. There were 4 minor non-conformities were raised during the internal audit. All closed.</p> <p>All verification of audit finding were verified through Sustainability Certification Online Tracking System (SCOTS).</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Both the estates and mill audited maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. Estates / Mill performances are reviewed during the monthly meeting with Regional General Manager or Zone Head. Records sampled for verification as stated under indicated 3.3.2.</p>	Complied
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</p>	<p>Since the last audit, there have been no new operations initiated at the mill, nor have there been any new planting activities conducted</p>	Complied

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	<p>stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>at each estate of the Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit that could potentially alter their social and environmental impacts. The social and environmental impacts arising from both mill and estate operations have remained consistent.</p> <p>Despite the lack of significant changes in operations, each operating unit has diligently conducted their Social Impact Assessment (SIA) and Environmental Impact Assessment (EIA).</p> <p>Detailed information regarding these assessments can be found in Indicator 3.4.2, provided below.</p> <p>For the year 2023/2024, an Environmental Impact Assessment (EIA) was established to identify environmental aspects in all estate activities. This assessment was documented using Environmental Aspects Impacts Identification and Environmental Impacts Evaluation forms, covering all activities in the estates and mill. The EIA was conducted in accordance with established Standard Operating Procedures (SOP), as outlined in the SOP Standard Operating Manual, subsection 5.4: Planning, and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure. Sample of activity verified were:</p> <p>Estates</p> <ol style="list-style-type: none"> 1. Grass cutting 2. Parking vehicle 3. Herbicide spraying 4. Maintenance station 5. Store cleaning 	
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		<p>Mill</p> <ol style="list-style-type: none"> 1. Steriliser 2. Boiler 3. Laboratory 4. EFB dumpsite 5. Final discharge <p>New planting activities in Bukit Cheraka Estate were undertaken in 2019, involving a conversion area of 11.95 ha from nursery to Oil Palm within the certified area. A Social and Environmental Impact Assessment (SEIA) dated 28/11/2018, along with Land Use Change Analysis (LUCA) and Carbon Stock Assessment, were conducted in 2018 by the Group Sustainability Department.</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 Social Impact Assessment (SIA) was conducted from 02 to 04 Nov-2015 by the Social & Environment Projects Unit (PSQM Department). The assessment employed various methods, including a rational mechanism for assessing impact and consultation with stakeholders, involving operating units under Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit. Stakeholders consulted during the assessment are documented in the attendance records.</p> <p>The findings of the assessment were categorized into five distinct areas: good practices/findings, issues, complaints, suggestions, and other findings by stakeholders.</p> <p>New planting activities in Bukit Cheraka Estate were undertaken in 2019, involving a conversion area of 11.95 ha from nursery to Oil Palm within the certified area. A Social and Environmental Impact Assessment (SEIA) dated 28/11/2018, along with Land Use Change</p>	Complied

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		<p>Analysis (LUCA) and Carbon Stock Assessment, were conducted in 2018 by the Group Sustainability Department.</p> <p>The Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit Management Plan was updated on 03/01/2024 by the respective operating unit management, focusing on areas identified in the Social Impact Assessment, including:</p> <ul style="list-style-type: none"> • Working Conditions: Enhancing understanding of workers' benefits entitlements. • Housing Condition/Living Improvement: Improving overall maintenance and cleanliness of housing complexes, organizing more social activities such as family days, and conducting meetings with stakeholders. <p>The SEIA, along with its management and monitoring plan, is continuously reviewed and updated, with the participation of affected stakeholders, both internal employees and external stakeholders. The latest external stakeholder consultation meeting was conducted on 23/01/2024.</p> <p>The management plan entails various action plans as outlined below:</p> <ul style="list-style-type: none"> • Environmental Risk Management: Reviewing Environmental Impact Assessments (EIA) / Environmental Impact Evaluations (EIE) to address any operational changes. • Domestic Waste Management: Disposing of domestic waste through MDKL (Majlis Daerah Kuala Langat). • Sewage Waste Management: Engaging with licensed contractors for effective sewage management. 	
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		<ul style="list-style-type: none"> • Scheduled Waste Management: Maintaining an inventory and ensuring proper disposal of scheduled waste. • Recyclable Waste Management: Disposing of recyclable waste through registered purchasers and conducting frequent checks. • Water Management: Immediately repairing broken pipelines and identifying any leakages for efficient water management. <p>New planting activities in Bukit Cheraka Estate were undertaken in 2019, involving a conversion area of 11.95 ha from nursery to Oil Palm within the certified area. A Social and Environmental Impact Assessment (SEIA) dated 28/11/2018, along with Land Use Change Analysis (LUCA) and Carbon Stock Assessment, were conducted in 2018 by the Group Sustainability Department.</p> <p>The SEIA, along with its management and monitoring plan, were continuously reviewed and updated with the participation of affected stakeholders, both internal among employees and external stakeholders, with the latest external stakeholder consultation meeting conducted on 07/02/2023.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The management plan is established based on operations with significant impacts on social aspects and is subject to annual review. It comprehensively outlines social issues, mitigation actions, monitoring plans, and assigns responsibility for implementation monitoring.</p> <p>The Social Management Plan is derived from the Social Impact Assessment (SIA) conducted from 02 to 04 Nov-2015 by the Social & Environment Projects Unit (PSQM Department). The Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit Management Plan was updated on 03/01/2024 by the respective</p>	Complied

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		<p>operating unit management, focusing on areas identified in the Social Impact Assessment, including:</p> <ul style="list-style-type: none">• Working Conditions: Enhancing understanding of workers' benefits entitlements.• Housing Condition/Living Improvement: Improving overall maintenance and cleanliness of housing complexes, organizing more social activities such as family days, and conducting meetings with stakeholders. <p>The SEIA, alongside its management and monitoring plan, undergoes continuous review and updates, with the participation of affected stakeholders, both internal employees and external stakeholders. The latest external stakeholder consultation meeting was conducted on 23/01/2024.</p> <p>Continuous implementation and monitoring of the Social Management Plan include:</p> <ul style="list-style-type: none">• Provision of Decent Accommodation: Ensuring workers are provided with decent accommodation, including basic furniture such as beds, mattresses, and cupboards. Regular housing inspections, as per legal requirements, are conducted weekly (PIOA) and quarterly (EWC) to ensure compliance with housing conditions.• Monitoring of Minimum Wages: Ensuring compliance with legal requirements for both own checkroll and contractor's workers.• Contribution to Community Development: Contributing towards the development of local communities through initiatives such as school donations, prioritizing employment among local communities, and supporting local business providers.	
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		<p>The management plan, established based on operations with significant environmental impacts, undergoes annual review. It outlines environmental issues, mitigation actions, monitoring plans, and assigns responsibilities for implementation oversight. Among the plan established were:</p> <ol style="list-style-type: none"> 1. Environmental management plan <ul style="list-style-type: none"> - To review EAI/EIE for any changes in operation - Create further awareness on recycling among workers through training - Monitoring of estate quarters 2. Waste Management Plan <ul style="list-style-type: none"> - Maintain inventory of SW - Inventory for storage of SW - Put signages and centralised all the waste of scrap iron bay 3. Pollution Prevention Plan <ul style="list-style-type: none"> - Ensure the preventive maintenance vehicles checklist were in place. Regularly inspection is carried out to these vehicles. - To place a tray under neath the vehicles 4. Water Management Plan <ul style="list-style-type: none"> - Water supply to purchase from SYABAS - Awareness of water consumption - To carry out immediately repair of broken pipelines and identify any leakages. 	
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		<p>5. IPM Management Plan</p> <ul style="list-style-type: none"> - Intensive planting of beneficial plant - Fixing barn owl box achieve target ration 1:10 - IPM Bagworm refreshment training 	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit is adhering to the Hiring of Local Workers Procedure (revised in 2020), as well as the Migrant Worker Responsible Recruitment Procedure (revised on 20/08/2021). Both of these procedures have been put in place by the management of SDP. These procedures meticulously outline the recruitment processes for both local and foreign workers, ensuring that all hiring practices are conducted in accordance with established guidelines and ethical standards. The procedures also detailed on the retirement and termination process. The process was according to the legal requirements.</p> <p>The guideline for the recruitment of local workers in the year 2020 delineates the recruitment process into two phases: pre-recruitment and post-recruitment. During pre-recruitment, vacant positions in the operating units are identified by management. Interested parties submit applications, which are then screened and shortlisted. During interviews, assistant managers provide briefings about job roles, tasks, and expectations. Successful applications are approved by managers and proceed to the medical examination stage. Post-recruitment involves successful candidates undergoing medical check-ups before being issued offer letters. They then sign employment contracts, undergo induction and on-the-job training before commencing work.</p>	Complied

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		<p>For migrant workers, recruitment procedures are outlined in the Migrant Worker Recruitment Procedure of 2021. The recruitment of foreign workers is handled by the headquarters through appointed agents in respective countries.</p> <p>Procedure Career Progression for Workers Level (SDP/HRUM/2020/SOP01 Date: 01/01/2020) was established for the promotion procedure. The detail as below</p> <ul style="list-style-type: none"> • General Worker/Harvester to Mandore Level • Mandore to Supervisor Level <p>Staff career progression is determined by Key Performance Indicators (KPIs) and years of experience.</p>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Employment procedures are well implemented with records well maintained application form for employment, interview form, medical check-up report, photocopied of identification card, employment contract and induction training record were sighted for new recruited employees.</p> <p>For local workers, verified job application form, records for interview, medical check-up records and offer letter. While for foreign workers, records verified is medical check-up (FOMEMA), and offer letter.</p> <p>As per interview with workers, it has been confirmed that the recruitment process is in line with the procedure.</p> <p>There is no promotion and termination has taken place in year 2023 and has been confirmed through interview, document review.</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			

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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>Sime Darby Plantation Berhad have established OSH Risk Management Procedure UM/HSE/SP/01 effective date 09 March 2021. Risk were identified and assessed in accordance to the established HIRARC an also in compliance to legal requirements as stated below.</p> <p><u>Bukit Kerayong Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. HIRARC was available to address all the risks and hazards associated to the operations in the estate. The sample HIRARC taken was reviewed on 23/08/2023 for Clarification Opeation, 09/08/2023 for Workshop Electrical, 07/12/2023 for laboratory Operation and 22/11/2022 for Boiler Operation 2. Chemical Health Risk Assessment was conducted in the mill in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. CHRA Report Reference Number: HQ/09/ASS/00/124-2020/0017 Date of Assessment: 24/02/2020. – there is no medical surveillance were recommended by the assessor 3. Medical Surveillance Programme has been performed successfully for the year 2023 on 07/02/2023 for 10 workers, found that all of them are fit. 4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. Noise Risk Assessment (NRA) has been conducted on 07/02/2022 . NRA Report (Assessor Registration Number: HQ/94/PEB/00/08) available for verification. The recommendation stated by the assessor have been affectively addressed as verified. 	Complied
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		<p>5. An audiometric testing was done on 11/09/2023. The results indicated that there were 2 workers were recommended to OHD due to abnormal audiometric result. Retest was conducted on 10/10/2023 and found that both of them were normal</p> <p><u>Bukit Kerayong Estate</u></p> <ol style="list-style-type: none"> 1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Spraying, Manuring and Office Operations. Verification done on the documentations and operations indicated that all the risk controls were adhered to. 2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. Chemical Hazard Risk Assessment dated 24/08/2020, Ref No: HQ/09/ASS/00/124-2020/0042. 3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification. The management has conducted the medical surveillance dated 08/05/2023, for 60 workers. All workers are declared fit to work by OHD. 4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. Noise risk assessment dated 27/10/2021, conducted by assessor with registration number SL/19/04/196. For details, please refer to report no. HQ/10/PEB/00/112 – 176/2021. 	
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		<p>5. The management has issued Purchase Order to conduct the audiometric test on 29/02/2024, as there is no slot from the contractor to conduct the test. Previous report dated 07/02/2023 found that all workers found to have normal audiometric.</p> <p><u>Bukit Cheraka Estate</u></p> <ol style="list-style-type: none"> 1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Spraying, Manuring and Office Operations. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Sample taken is as the following, Harvesting, dated 16/01/2023, Manuring, dated 11/03/2022, Spraying, dated 11/03/2022 2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. Chemical Hazard Risk Assessment dated 22/02/2020, Ref No: HQ/09/ASS/00/124-2020/0016. 3. The management has conducted the medical surveillance dated 08/05/2023, for 30 workers. All workers are declared fit to work by OHD. 4. Noise Risk Assessment was conducted on 24/06/2020 with report Ref No: HQ/18/PEB/00/00021, by Muhaxxxx Haxxz Bin Hxxan. <p>The management has conducted the audiometric dated 21/12/2023, and the report were received on 15/02/2024. Found</p>	
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		that there are 3 workers were having abnormal audiometric (Not STS).	
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>Annual Health and Safety Plan available for the estate and mill are mostly implemented through Annual Training Program 2023 and monitored via inspections to address the identified health and safety risks. The emphasis is on safe work by providing,</p> <ul style="list-style-type: none"> ▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk. ▪ Awareness and understanding of workplace hazards and how to identify, report, and control them. ▪ Specialized training when their work involves unique hazards. <p>Besides formal classroom training, other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"> • Internal Audit conducted by the Sustainability Department. • Work Site Inspection (WSI) by site OSH Committee. • Direct involvement of supervisor and rounds by Asst Manager. • Safety incidents reporting via Rapid4. • Health / medical surveillance. • Chemical exposure monitoring, and • Daily Monitoring Checklist such as PPE Checklist 	Complied

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		The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(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>The operating units visited has conducted training need analysis for all employee, management, and contractors. The need analysis was conducted based on the job designation and training required by the job type.</p> <p>Trainings was identified for management, employee and contractors and programmed throughout FY 2024. The training identified covers the safety and health, environmental and social aspect.</p> <p>Means implemented by Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit were to assess understanding of participants include:</p> <ul style="list-style-type: none"> • Participants completing post-training evaluation/feedback form and give suggestions. • Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended. <p>Random interviews with workers showed that they understood what RSPO is, the several subsidiaries' policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, etc.</p>	Complied

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3.7.2	Records of training are maintained. - Minor Compliance -	<div>The operating units maintained the training records conducted. Sample of the training records are as following:</div> <div><u>Bukit Kerayong Estate</u></div> <table><thead><tr><th>Training</th><th>Date</th></tr></thead><tbody><tr><td>Fertiliser Briefing And Practical</td><td>05/12/2023</td></tr><tr><td>NADOPOD Refresher Training</td><td>27/11/2023</td></tr><tr><td>Water Sampling Training</td><td>21/11/2023</td></tr><tr><td>ILO Training</td><td>30/10/2023</td></tr><tr><td>Medical Training</td><td>14/09/2023</td></tr><tr><td>Safety Briefing to FFB Transporter</td><td>11/09/2023</td></tr><tr><td>Noise Exposure Training</td><td>04/08/2023</td></tr><tr><td>First Aid training and CPR Demo</td><td>12/05/2023</td></tr></tbody></table> <div><u>Bukit Cheraka Estate</u></div> <table><thead><tr><th>Training</th><th>Date</th></tr></thead><tbody><tr><td>SOP Training</td><td>20/10/2023</td></tr><tr><td>Chemical And Spraying Training</td><td>29/11/2023</td></tr><tr><td>First Aid Training</td><td>27/09/23</td></tr><tr><td>Emergency Response Plan Training</td><td>18/10/2023</td></tr></tbody></table>	Training	Date	Fertiliser Briefing And Practical	05/12/2023	NADOPOD Refresher Training	27/11/2023	Water Sampling Training	21/11/2023	ILO Training	30/10/2023	Medical Training	14/09/2023	Safety Briefing to FFB Transporter	11/09/2023	Noise Exposure Training	04/08/2023	First Aid training and CPR Demo	12/05/2023	Training	Date	SOP Training	20/10/2023	Chemical And Spraying Training	29/11/2023	First Aid Training	27/09/23	Emergency Response Plan Training	18/10/2023	Complied
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3.7.3	<p>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.</p> <p>- Minor Compliance -</p>	<p>The mill has designated personnel involved in supply chain certification and established a committee, as per the appointment letter signed by the Mill Manager. The identified personnel and committee members include Assistant Managers, Weighbridge Clerks, Operation Supervisors, Laboratory Analysts, FFB Graders, and Auxiliary Police.</p> <p>To ensure understanding and awareness of the supply chain certification system among all workers, the management conducted training sessions. The reviewed training sessions include:</p>	Complied																						

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		SCCS Standard Operating Procedure training conducted on 07/02/2024. Awareness training on updated SCCS Procedure was conducted through Microsoft Teams on 13/02/2024.	
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 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.	Bukit Kerayong POM is under mass balance module. Thus, this indicator is not applicable.	Not Applicable
3.8.2	Mass Balance Module 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.	Bukit Kerayong POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified FFB as MB certified.	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)	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public	Complied

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	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.	summary report. The actual tonnage produced from last audit date is reported in the summary in Table 7 and Table 10.									
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<div>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</div> <table><tr><td>Member Name</td><td>Strategic Operating Unit (SOU 7) – Bukit Kerayong Palm Oil Mill</td></tr><tr><td>Member ID</td><td>RSPO_PO1000000155</td></tr><tr><td>RSPO Membership Number</td><td>1-0008-04-000-00 (Sime Darby Plantation Berhad)</td></tr><tr><td>Type of Business</td><td>Oil mill</td></tr></table>	Member Name	Strategic Operating Unit (SOU 7) – Bukit Kerayong Palm Oil Mill	Member ID	RSPO_PO1000000155	RSPO Membership Number	1-0008-04-000-00 (Sime Darby Plantation Berhad)	Type of Business	Oil mill	Complied
Member Name	Strategic Operating Unit (SOU 7) – Bukit Kerayong Palm Oil Mill										
Member ID	RSPO_PO1000000155										
RSPO Membership Number	1-0008-04-000-00 (Sime Darby Plantation Berhad)										
Type of Business	Oil mill										
3.8.5	<div>Documented procedures</div> <div>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</div> <div><div>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</div><div>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</div><div>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</div></div>	<div>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</div> <div><div>a) Refer Sustainable Supply chain and Traceability Procedure dated January 2024 with reference number SD/GSD/202401/SCCS.</div><div>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.</div><div>c) Mill have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated in Sustainable Supply chain and Traceability Procedure dated January 2024 Section 4.0 Responsibilities.</div></div>	Complied								

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	<p>able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the Sustainable Supply chain and Traceability Procedure dated January 2024 Section 7.0 Receiving FFB at the Mill. Bukit Kerayong POM was MB Mill thus there is no issue on the contamination.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>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-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>i) The procedure to conduct annual internal audit is addressed in the Sustainable Supply chain and Traceability Procedure dated January 2024. Refer section 18.0 Internal Audit. Refer latest SCCS Internal Audit dated 21/09/2023. Based on the internal audit report and checklist, the elements of RSPO supply chain were adequately covered including the RSPO Market Communications and Claims elements.</p> <p>ii) There was one non-conformity raised from the internal audit. For non-conformity, corrective action has been established to rectify the lapse found. The status of the non-conformity shall also be discussed in the management review meeting.</p>	Complied
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>Bukit Kerayong POM maintain the daily records of all certified and uncertified FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details. The mill has maintained records of FFB received such as Delivery Notes and Weighbridge operator. Sample of FFB delivery records:</p> <p>Incoming FFB</p> <p>Certified Supply Base</p>	Complied

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		<p>Company: Sime Darby Plantation Berhad</p> <ul style="list-style-type: none"> Estate: Bukit Kerayong Estate Certified No: RSPO 550181 Date: 29/12/2023 Ticket Number: 69XX Vehicle Number: SMCXXXX Field / Block: P 2018C FFB Weight: 9.73 MT <p>Certified Supply Base</p> <p>Company: Sime Darby Plantation Berhad</p> <ul style="list-style-type: none"> Estate: Bukit Cheraka Estate Certified No: RSPO 550181 Date: 29/12/2023 Ticket Number: 589XX Vehicle Number: NBEXXX Field / Block: P 2010 A FFB Weight: 14.19 MT <p>Non-Certified 3rd Party FFB</p> <ul style="list-style-type: none"> Company: SXXXXXXXX SXXXX Estate: SXXXXXXXX SXXXX Estate Date: 29/12/2023 	
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		<ul style="list-style-type: none"> Ticket Number: 186XXX Vehicle Number: BRNXXXX FFB Weight: 12.45 MT <p>Mechanism to handle non-conforming FFB and documents has been detailed up in the Procedure Sustainable Supply chain and Traceability Procedure dated January 2024 Section 11.0.</p>	
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> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>Bukit Kerayong POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - MB</p> <ol style="list-style-type: none"> The name and address of the buyer; BUYERXXXXXX The name and address of the seller; Bukit Kerayong POM The loading or shipment / delivery date; 01/02/2023 The date on which the documents were issued; 01/02/2023 RSPO Certificate Number: RSPO 550181 A description of the product: CPO MB The quantity of the products delivered; 37.88 Mt Any related transport documentation; WLEXXX A unique identification number: 014XXX <p>PK - MB</p> <ol style="list-style-type: none"> The name and address of the buyer; BUYERXXXXXX The name and address of the seller; Bukit Kerayong POM 	Complied

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		c) The loading or shipment / delivery date; 29/12/2023 d) The date on which the documents were issued; 29/12/2023 e) RSPO Certificate Number: RSPO 550181 f) A description of the product: PK MB g) The quantity of the products delivered; 19.63 Mt h) Any related transport documentation; BLVXXXX i) A Unique identification number: 015XXX	
3.8.9	<p>Outsourcing Activities</p> <p>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</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>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> <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>Bukit Kerayong POM has established Standard Operating Procedure related Outsourcing Activities. Refer Sustainable Supply chain and Traceability Procedure dated January 2024 with reference number SDP/GSD/202401/SCCS Section 13.0.</p> <p>i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Bukit Kerayong POM was for CPO and PK transportation.</p> <p>ii. Sighted the contract agreement between Sime Darby Plantation Berhad and contractor:</p> <p>a) Bukit Kerayong POM has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB Supplier Certified and Non-Certified. The contract agreement and details like MPOB licence were kept in the file.</p> <p>b) Refer Contract Agreement between Sime Darby Plantation Berhad and CPO Transportation (MX BXXXXXXXX JXXX Sdn Bhd: Validity 22/12/2023 – 21/03/2024 and PXXXXXXXXXX SXX TXXXXXX SXXXX: 07/11/2023 – 06/02/2024) as per email dated 21/12/2023. Refer Ad Hoc</p>	Complied

	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>Contract for CPO Transportation Services for KKS Bkt Kerayong.</p> <p>c) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on agreements, transporter has no ownership of transported products and owned by buyer.</p> <p>d) The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements. Refer Section 8.0 Obligation, Undertakings and Covenants Of The Transporter.</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 transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system. The independent third parties involve in Mill operation is only transportation services for CPO and PK.	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.	<p>There are new contractors used for the handling of certified CPO and PK. As per stated in the procedure Section 13.5 "The Mill shall inform in advance the outsourced contractors if audit is deemed necessary by Certification Bodies (CB) and ensure that the contractors engaged provide relevant access for the CBs to their respective operations, system, and any and all information, when this is announced in advance."</p> <p>The changes of new contractors of handling RSPO certified of oil palm products was not informed to CB.</p> <p>Based on verification, it was found the new contractor was appointed to handling CPO Transportation (MX BXXXXXXXX JXXX Sdn Bhd: Validity 22/12/2023 – 21/03/2024 and PXXXXXXXXXX SXX TXXXXXX SXXXX: 07/11/2023 – 06/02/2024) as per email dated</p>	Non-compliance

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		21/12/2023. Verified previous transporter was FXX TXXXXXXXXX SXXXXXXXX Sdn Bhd with T/SDPB/PEN/CPO/0720/003. It was not in line with procedure Section 13.6 "The Mill at its next RSPO Audit inform its CB of the names and contact details of any contractor used". Thus, major NC was raised.	
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> 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. 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. 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. 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. 	<p>Record Keeping</p> <ul style="list-style-type: none"> i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible. ii) The retention period for maintaining the traceability records is 3 years as stated in the January 2024 with reference number SDP/GSD/202401/SCCS, Section 5.4. iii) NA as the mill is using MB model. iv) For Mass Balance Module: <ul style="list-style-type: none"> a. Bukit Kerayong POM have kept all records and maintained balance of RSPO certified FFB and CPO and PK Deliveries. b. Certified CPO and PK despatch that are delivered was deducted from the material accounting system. c. Bukit Kerayong POM has delivered Mass balance from a positive stock. Verified through Mass Balance sheet and Palm Trace transaction. 	Complied

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3.8.13	<p>Extraction Rate</p> <p>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.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Verified OER and KER as below.</p> <table><tr><td>Month</td><td>OER</td><td>KER</td></tr><tr><td>Feb 2023 – Jan 2024</td><td>18.54</td><td>4.28</td></tr></table>	Month	OER	KER	Feb 2023 – Jan 2024	18.54	4.28	Complied
Month	OER	KER							
Feb 2023 – Jan 2024	18.54	4.28							
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Bukit Kerayong POM derives the extraction rates based on the actual extraction rate produced in the mill. Therefore, the accuracy is continuously maintained.</p>	Complied						
3.8.15	<p>Processing</p> <p>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-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>NA as the mill is using MB module.</p>	Not Applicable						
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>Registration of transactions</p> <p>i) The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Verified the registration of CPO Sale and PK Sale.</p> <p>ii) RSPO Certified Volumes Sold under as different scheme or unconventional was not able to be confirmed its shipping announcement by the buyer for the current licence period. Sime Darby Plantation Berhad have a system in place to remove the stocks at their respective time interval which was not at this particular audit. Refer correspondence email between Representative HO with Global Trading Department dated</p>	Non-compliance						

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		<p>16/10/2023 titled "Palmtrace CSPO & CSPK Volume Removal for month of October and November 2023".</p> <p>There is no removal of PK has been made in the RSPO IT Platform for Certified PK sold as conventional.</p> <p>Based on verification of Mass Balance Record 2023, Pre Audit Info 2024 and CPO and PK Delivery Record sighted availability RSPO Certified CPO and PK sold as conventional, CPO: 523.71 MT and PK: 91.87 MT in the period Feb to Mar 2023 (Previous License Periods). Verification with RSPO IT Platform (Palm Trace), Removal for CPO has been made however there is no evidence of removal has been made for the PK. Thus, major NC was raised</p>	
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>	<p>RSPO trademark was not used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
General corporate communications			
4.1	<p>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.</p>	<p>The Sime Darby Plantation Berhad has highlighted its RSPO membership and its commitment to the objectives and principles of RSPO via Sime Darby Plantation's (SDP) 2021 Sustainability Report, which stated "SDP was a founding member of the Roundtable on Sustainable Palm Oil (RSPO) in 2004. We started working towards 100% RSPO certification across our operations in 2008, making sustainable, ethically-sourced palm oil our rallying cry."</p>	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>In the Sime Darby Plantation's (SDP) 2021 Sustainability Report, SDP has stated their targets and progress, i.e., 100% RSPO certified estates and mills, Support 100% scheme smallholders in Indonesia</p>	Complied

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	<p>C. state that the member supports the work of RSPO</p> <p>D. state the member's history with regard to RSPO</p> <p>E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership</p>	<p>to obtain RSPO certification and Maintain RSPO certification for 100% of smallholders in PNG and Solomon Islands.</p> <p>Details of RSPO Trademark License of Sime Darby Plantation as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, in the corporate communications, no usage of RSPO Trademark License.</p>	
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.	Based on the desktop studies, site visit and documentation review, it is confirmed that there is no usage of the RSPO corporate logo.	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.	Based on the desktop studies and documentation review, it is confirmed that there is no statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	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)." 	Evident from the Sime Darby Plantation's (SDP) 2021 Sustainability Report that the management has made statements that highlight their RSPO certification status and product-related claims in their corporate communication tools which complied with the requirement of RSPO Market Communication and Claims 2020.	Complied

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	<ul style="list-style-type: none"> • “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.” • “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>	<p>As indicated on the RSPO website (https://rspo.org/members/1-0008-04-000-00/), Sime Darby Plantation Berhad has been an RSPO member since 07 September 2004, holding RSPO Membership No. 1-0008-04-000-00. Therefore, this specific indicator is deemed Not Applicable for this UoC.</p>	Not Applicable
Product-specific communications			

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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, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the UoC does not make on-pack claims. However, it has been noted that off-pack claim is made by the UoC through shipping documents and invoices, specifically for RSPO-certified Crude Palm Oil (CPO) and Palm Kernel (PK). Additionally, an off-pack claim is also stated in Sime Darby Plantation's (SDP) 2021 Sustainability Report.	Complied
5.1.2	Product-specific communications are voluntary.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the Product-specific communications are made voluntary by the management.	Complied
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.	<p>Details of RSPO Trademark License of Sime Darby Plantation as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
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.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that there is no usage of any other trademark or label by the management.	Complied
5.1.5	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	As Bukit Kerayong Palm Oil Mill processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable

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	<p>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. 		
5.1.6	<p>Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as 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</p>	<p>As Bukit Kerayong Palm Oil Mill processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.</p>	Not Applicable
5.2 Off pack claims			
5.2.1	<p>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.</p>	<p>Bukit Kerayong POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - MB</p> <p>a) The name and address of the buyer; BUYERXXXXXX</p> <p>b) The name and address of the seller; Bukit Kerayong POM</p>	Complied

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		c) The loading or shipment / delivery date; 01/02/2023 d) The date on which the documents were issued; 01/02/2023 e) RSPO Certificate Number: RSPO 550181 f) A description of the product: CPO MB g) The quantity of the products delivered; 37.88 Mt h) Any related transport documentation; WLEXXX i) A unique identification number: 014XXX PK - MB a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; Bukit Kerayong POM c) The loading or shipment / delivery date; 29/12/2023 d) The date on which the documents were issued; 29/12/2023 e) RSPO Certificate Number: RSPO 550181 f) A description of the product: PK MB g) The quantity of the products delivered; 19.63 Mt h) Any related transport documentation; BLVXXXX i) A Unique identification number: 015XXX	
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.	Bukit Kerayong POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below: CPO - MB	Complied

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		<p>a) The name and address of the buyer; BUYERXXXXXX</p> <p>b) The name and address of the seller; Bukit Kerayong POM</p> <p>c) The loading or shipment / delivery date; 01/02/2023</p> <p>d) The date on which the documents were issued; 01/02/2023</p> <p>e) RSPO Certificate Number: RSPO 550181</p> <p>f) A description of the product: CPO MB</p> <p>g) The quantity of the products delivered; 37.88 Mt</p> <p>h) Any related transport documentation; WLEXXX</p> <p>i) A unique identification number: 014XXX</p> <p>PK - MB</p> <p>a) The name and address of the buyer; BUYERXXXXXX</p> <p>b) The name and address of the seller; Bukit Kerayong POM</p> <p>c) The loading or shipment / delivery date; 29/12/2023</p> <p>d) The date on which the documents were issued; 29/12/2023</p> <p>e) RSPO Certificate Number: RSPO 550181</p> <p>f) A description of the product: PK MB</p> <p>g) The quantity of the products delivered; 19.63 Mt</p> <p>h) Any related transport documentation; BLVXXXX</p> <p>i) A Unique identification number: 015XXX</p>	
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5.2.3	<p>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:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil 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. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	As Bukit Kerayong Palm Oil Mill processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable
5.3 On pack claims			
5.3.1	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>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
5.3.2	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.	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 	Complied

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	<p>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)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<ul style="list-style-type: none"> • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been</p>	Complied

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		made. Consequently, further assessment of this requirement cannot be conducted.	
	<p>D) For Products covered with Book and Claim (B&C):</p> <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* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 	Complied

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		<ul style="list-style-type: none"> License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	
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.	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
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.	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
MODULE B – MASS BALANCE SPECIFIC RULES			

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Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	Oil palm content for CPO and PK is 100% RSPO MB certified. Non-certified FFB is come from external crop and since Bukit Kerayong POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	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.	Bukit Kerayong POM only applies MB model, and the conventional CPO are downgraded from MB whenever demanded. Non-certified FFB is come from external crop and since Bukit Kerayong POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	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 RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Bukit Kerayong POM is producing crude palm product and does not involve in any labelling of end product.	Complied
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <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 	No messaging involved since Bukit Kerayong POM is producing crude palm product and does not involve in any labelling of end product.	Complied

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	<p>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.</p> <ul style="list-style-type: none"> 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>Sime Darby Plantation Berhad has established Human Rights Charter as commitment to respect human right revised in 2020. Commitment of Sime Darby Plantation Berhad has been outlined in Clause 3.2 which included but not limited to equal opportunities, respecting freedom of association, combating modern slavery, enhancing health and safety, protecting the right of children, and eliminating violence and harassment. Other than that, Sime Darby Plantation Berhad has been established other policy regards to human right defender in the document “Policy on the Protection of Human Rights Defenders (HRDs)” updated 2020 which clearly stated in Clause 3.2 that in the course of their engagement with SDP shall be protected from violence, threats and all forms of retaliation.</p> <p>For external stakeholders, the communication of the policy has been conducted through stakeholders' consultations held on 23/01/2024. These consultations were attended by various stakeholders representing all operating units under Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit. Additionally, policy dissemination has been ensured to all workers through regular workers' meetings and assembly sessions.</p>	Complied

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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>As per verification through interview and documentation, there is evidence that all operating units under Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit did instigate violence or use any form or harassment There is no cases of harassment included sexual harassment, bullying and abuse has been reported and identified by auditor during the audit.</p>	Complied
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 whistleblowers, 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 (<i>Suara Kami</i>, whistleblowing) and 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>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>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 <i>Suara Kami</i> has been pasted at the safety helmet for each worker. As per interview, workers and stakeholders can demonstrate their understanding on procedures. Based on interview also confirmed that there are no illiterate parties has been identified for each operating unit.</p>	Complied
4.2.3	<p>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.</p>	<p>There is evidence that any grievance that has been raised by workers/stakeholders has been responded in timely manner. As per</p>	Complied

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	- Minor compliance -	interview with the workers, the management of each operating units is responsive for all complaint/grievance receive.	
4.2.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation 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.</p>	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation 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.</p> <p>The company's sustainable development initiatives, including consultations with local communities, are prominently showcased on its website. For example, projects highlighted on the company's website, such as those detailed at https://www.yayasansimedarby.com/our-projects/community-health, exemplify efforts to address community health needs and enhance well-being.</p>	Complied

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		<p>Specific contributions to community development initiatives by the uoC, derived from consultations with local communities, include:</p> <ul style="list-style-type: none"> (1) Facilitating Hindu Worship Practices: Supporting the affairs of Hindu workers to worship at the temple by providing clean water. (2) Support for School Activities: Contributing cash or equipment for various school events, enriching educational opportunities for local students. (3) Community Water Provision: Contributing to providing water access to local communities, addressing essential needs for clean water. (4) Support for Research Initiatives: Assisting final year students at UiTM with research matters and thesis preparation, nurturing academic excellence and knowledge dissemination. <p>These contributions underscore Sime Darby Plantation Berhad's dedication to community development and reflect tangible outcomes resulting from consultations with local communities. By actively engaging with stakeholders and addressing identified needs, the company continues to make meaningful contributions to local sustainable development.</p>	
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>Based on the provided information and land title samples, it is confirmed that Sime Darby Plantation Berhad (SDP) owns the land titles for the mentioned estates, and the right to use the land for oil palm cultivation is legally established. The land titles are held in perpetuity, and there are no recorded disputes over the ownership of the land. Additionally, there have been no changes to land ownership or new land acquisitions since the last assessment. The</p>	Complied

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		<p>sampled land titles include details such as lot number, land title number, lot area, and ownership records, with SDP identified as the legal owner. Samples as below:</p> <p><u>Bukit Kerayong Palm Oil Mill:</u></p> <table><tr><th>Lot. No.</th><th>Land Title No.</th><th>Area (Ha.)</th></tr><tr><td>Lot 2894</td><td>52712</td><td>11.7106</td></tr></table> <p><u>Bukit Kerayong Estate:</u></p> <p>21 land title available. Samples:</p> <table><tr><th>Lot. No.</th><th>Land Title No.</th><th>Area (Ha.)</th></tr><tr><td>Lot 1592</td><td>51653</td><td>404.7862</td></tr><tr><td>Lot 2896</td><td>52713</td><td>424.0087</td></tr><tr><td>Lot 5495</td><td>47151</td><td>222.6526</td></tr><tr><td>Lot 5497</td><td>41054</td><td>252.7005</td></tr><tr><td>Lot 5498</td><td>41046</td><td>224.5496</td></tr></table> <p><u>Bukit Cheraka Estate:</u></p> <p>133 land titles available. Samples:</p> <table><tr><th>Lot. No.</th><th>Land Title No.</th><th>Area (Ha.)</th></tr><tr><td>Lot 1983</td><td>340</td><td>2.5799</td></tr><tr><td>Lot 1573</td><td>347</td><td>3.0098</td></tr><tr><td>Lot 2111</td><td>1500</td><td>1.6946</td></tr></table>	Lot. No.	Land Title No.	Area (Ha.)	Lot 2894	52712	11.7106	Lot. No.	Land Title No.	Area (Ha.)	Lot 1592	51653	404.7862	Lot 2896	52713	424.0087	Lot 5495	47151	222.6526	Lot 5497	41054	252.7005	Lot 5498	41046	224.5496	Lot. No.	Land Title No.	Area (Ha.)	Lot 1983	340	2.5799	Lot 1573	347	3.0098	Lot 2111	1500	1.6946	
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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>In order to deal with future arising land dispute (if any), Sime Darby Plantation Berhad established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.</p>	Complied																											

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4.4.2a	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>In order to deal with future arising land dispute (if any), Sime Darby Plantation Berhad established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.</p>	Complied
4.4.2b	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation Berhad has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.</p>	Complied
4.4.2c	<p>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.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were</p>	Complied

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	<p>involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>available to demarcate the boundary of land. Verification also was done through Boundary Map with neighboring and found in order.</p> <p>Sime Darby Plantation Berhad has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.</p>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>In order to deal with future arising land dispute (if any), Sime Darby Plantation Berhad established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.</p>	Complied
4.4.5	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>In order to deal with future arising land dispute (if any), Sime Darby Plantation Berhad established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.</p>	Complied

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4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>In order to deal with future arising land dispute (if any), Sime Darby Plantation Berhad established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.</p>	Complied
<p>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.</p>			
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>New planting in Bukit Cheraka Estate has been conducted in 2019, conversion area of 11.95 ha from nursery to Oil Palm within the certified area. SEIA dated 28/11/2018, LUCA and Carbon Stock Assessment has been conducted in 2018. The new planting has been conducted as per company policies and Standard Operating Procedures established and does not involve planting beyond existing legal or authorised boundaries. Since the new planting was conducted within estate own certified area and not affecting any external parties, hence no negotiated agreements through FPIC need to be implemented.</p> <p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 7 – Bukit Kerayong Palm Oil Mill & Supply Bases since last audit. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally</p>	Complied

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		owned by SDP. Therefore, community representation through institutions of their own choosing cannot be further assessed.	
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>New planting in Bukit Cheraka Estate has been conducted in 2019, conversion area of 11.95 ha from nursery to Oil Palm within the certified area. SEIA dated 28/11/2018, LUCA and Carbon Stock Assessment has been conducted in 2018. The new planting has been conducted as per company policies and Standard Operating Procedures established and does not involve planting beyond existing legal or authorised boundaries. Since the new planting was conducted within estate own certified area and not affecting any external parties, hence no negotiated agreements through FPIC need to be implemented.</p> <p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit since last audit. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SDP. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.</p>	Complied
4.5.3	<p>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 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.</p> <p>- Minor compliance -</p>	<p>New planting in Bukit Cheraka Estate has been conducted in 2019, conversion area of 11.95 ha from nursery to Oil Palm within the certified area. SEIA dated 28/11/2018, LUCA and Carbon Stock Assessment has been conducted in 2018. The new planting has been conducted as per company policies and Standard Operating Procedures established and does not involve planting beyond existing legal or authorised boundaries. Since the new planting was conducted within estate own certified area and not affecting any</p>	Complied

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		<p>external parties, hence no negotiated agreements through FPIC need to be implemented.</p> <p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit since last audit. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SDP. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.</p>	
4.5.4	<p>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.</p> <p>- Minor compliance -</p>	<p>New planting in Bukit Cheraka Estate has been conducted in 2019, conversion area of 11.95 ha from nursery to Oil Palm within the certified area. SEIA dated 28/11/2018, LUCA and Carbon Stock Assessment has been conducted in 2018. The new planting has been conducted as per company policies and Standard Operating Procedures established and does not involve planting beyond existing legal or authorised boundaries. Since the new planting was conducted within estate own certified area and not affecting any external parties, hence no negotiated agreements through FPIC need to be implemented.</p> <p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit since last audit. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SDP. Therefore, FPIC is obtained</p>	Complied

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		for all oil palm development through a comprehensive process cannot be further assessed.	
4.5.5	<p>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.</p> <p>- Minor compliance -</p>	<p>New planting in Bukit Cheraka Estate has been conducted in 2019, conversion area of 11.95 ha from nursery to Oil Palm within the certified area. SEIA dated 28/11/2018, LUCA and Carbon Stock Assessment has been conducted in 2018. The new planting has been conducted as per company policies and Standard Operating Procedures established and does not involve planting beyond existing legal or authorised boundaries. Since the new planting was conducted within estate own certified area and not affecting any external parties, hence no negotiated agreements through FPIC need to be implemented.</p> <p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit since last audit. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SDP. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.</p>	Complied
4.5.6	<p>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.</p> <p>- Minor compliance -</p>	<p>New planting in Bukit Cheraka Estate has been conducted in 2019, conversion area of 11.95 ha from nursery to Oil Palm within the certified area. SEIA dated 28/11/2018, LUCA and Carbon Stock Assessment has been conducted in 2018. The new planting has been conducted as per company policies and Standard Operating Procedures established and does not involve planting beyond existing legal or authorised boundaries. Since the new planting was conducted within estate own certified area and not affecting any</p>	Complied

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		external parties, hence no negotiated agreements through FPIC need to be implemented. Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit since last audit. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SDP. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.	
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 -	There is no evidence of any land acquired for plantations or mill after 15 November 2018 within Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no evidence of any new lands acquired in areas inhabited by communities in voluntary isolation.	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 -	Sime Darby Plantation Berhad established Flowchart and Procedures on Handling Land Disputes (Version 1, dated 01/11/2008). The procedure has no changes, and it describes the process on any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional	Complied

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		Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	
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>	Sime Darby Plantation Berhad established Flowchart and Procedures on Handling Land Disputes (Version 1, dated 01/11/2008). The procedure has no changes, and it describes the process on any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	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>	The absence of reported issues related to the loss of legal customary rights with indigenous peoples, local communities, and other stakeholders is a positive finding during the audit. Additionally, the presence of boundary stones and trenches to demarcate land boundaries adds a layer of transparency and visibility, contributing to clear delineation and potentially minimizing disputes over land boundaries.	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>	The absence of reported issues related to the loss of legal customary rights with indigenous peoples, local communities, and other stakeholders is a positive finding during the audit. Additionally, the presence of boundary stones and trenches to demarcate land boundaries adds a layer of transparency and visibility, contributing to clear delineation and potentially minimizing disputes over land boundaries.	Complied

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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	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	Sime Darby Plantation Berhad established Flowchart and Procedures on Handling Land Disputes (Version 1, dated 01/11/2008). The procedure has no changes, and it describes the process on any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.7.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	Sime Darby Plantation Berhad established Flowchart and Procedures on Handling Land Disputes (Version 1, dated 01/11/2008). The procedure has no changes, and it describes the process on any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	There was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area. It was confirmed during interview with local communities where all operating unit under Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit has been planted with oil palm for second cycle.	Complied

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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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	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 be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied

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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	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>The weighbridge notice board exhibited the FFB price, and upon verification, it was confirmed to align with MPOB standards. This information was accessible to FFB suppliers. It's important to note that Bukit Kerayong POM doesn't directly obtain FFB from smallholders but acquires it from external sources such as independent estates, dealers, or collection centers. The purchasing prices for FFB are clearly outlined in the FFB purchasing contract, and these prices are determined based on the MPOB pricing methodology.</p>	Complied
5.1.2	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>Training for FFB suppliers was provided during the stakeholders' meeting and the contract signing process, as documented in the Stakeholder meeting. It's important to note that Bukit Kerayong POM does not directly procure FFB from independent smallholders but rather obtains it from external sources such as independent estates, dealers, or collection centers. The pricing mechanism is clearly outlined in the FFB purchasing contract. Sighted the record that the management has briefed the OCP on 06/12/2023.</p>	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>The FFB Price was confirmed to adhere to MPOB standards and was publicly accessible for smallholders. Notably, Bukit Kerayong POM doesn't directly acquire FFB from smallholders but rather procures it externally from independent estates, dealers, or collection centers. The FFB purchasing prices are explicitly outlined in the FFB purchasing contract, and these prices are determined in accordance with the MPOB pricing.</p>	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>	Bukit Kerayong POM does not buy FFB directly from independent smallholders; therefore, this indicator is not applicable	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Sample of FFB Sales and Purchase Contract is available for review, sighted the following sample:</p> <ol style="list-style-type: none"> 1. Gax Estxxx Contrxxxx Sdn Bhd – Bukxx Lagxxxx Estxxx – Agreement Number: P/P/1222/FFB04xxxx 2. Timxx Jahaxxxx Bx Abdxx Ghaxx Agreement Number: P/P/1222/FFB04xxxx <p>The FFB Pricing is details as per stipulated in section 9 – FFB Pricing.</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>	Evidence of payments from invoices and payment vouchers was verified, with the payment process being managed at the headquarters level. The details of payment documents, including weighbridge tickets, were reviewed, and it was confirmed that the payment process aligns with the agreed-upon agreement.	Complied
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>The management has conducted the regular inspection for the weighbridge. Details of the inspection is as following</p> <ol style="list-style-type: none"> 1. Serial No: B844688377 2. Safety Sticker No: DE18013647 3. Calibration Date: 31/10/2023 	Complied

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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>Bukit Kerayong POM doesn't directly obtain FFB from independent smallholders; instead, the mill acquires FFB externally from independent estates, dealers, or collection centers. Upstream, Outside Crop Purchasers (OCP) are responsible for identifying potential external suppliers. Adhering to Sime Darby Plantation Responsible Sourcing Guidelines (RSG), these potential suppliers undergo assessment to ensure no deforestation occurred after 2010, no planting in peat areas after 2010, possession of a valid land title (as demonstrated by sample suppliers or dealers), and holding a valid MPOB license for oil palm planting, transportation, and the sale of FFB.</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>- Critical (Major) compliance -</p>	<p>A grievance mechanism has been established, as outlined in the Grievance Response Standard Operating Procedure dated 18/07/2022. It's important to note that Bukit Kerayong POM does not directly procure FFB from independent smallholders.</p>	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>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.</p> <p>- Minor compliance -</p>	<p>As there are no smallholder programs within the Unit of Certification, this indicator is not applicable.</p>	Not Applicable
5.2.2	<p>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).</p> <p>- Minor compliance -</p>	<p>As there are no smallholder programs within the Unit of Certification, this indicator is not applicable.</p>	Not Applicable

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5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	As there are no smallholder programs within the Unit of Certification, this indicator is not applicable. Sime Darby Plantation Berhad has devised and implemented Responsible Sourcing Guidelines to encourage the legal production of FFB by smallholders. Traders or collection centers that source from the program developed by SDP undergo an annual evaluation of the smallholders associated with them.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	As there are no smallholder programs within the Unit of Certification, this indicator is not applicable. Outside crop suppliers are invited to stakeholders' meetings, where briefings and training sessions are conducted. Further details can be found in the minutes of the meeting with the stakeholders.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	As there are no smallholder programs within the Unit of Certification, this indicator is not applicable.	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 Rights Charter revised in year 2020 which clearly stated that Sime Darby Plantation 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	Complied

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		been given same opportunities. This has been verified by the auditor through interview with the workers from different origin, races, gender.	
6.1.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	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 has been charged to all foreign workers that has been recruited in year 2023. It has been confirmed through interview with the new recruited workers.	Complied
6.1.3	<p>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.</p> <p>- Minor compliance -</p>	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 different origin countries, races and gender and has been verified based on interview, and documentation such as medical check-up and interview records.	Complied
6.1.4	<p>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.</p> <p>- Minor compliance -</p>	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 are any cases of delaying on menstrual, hospital assistant will advise the female workers to conducted test to nearest government health clinic.	Complied

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6.1.5	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The Gender Committee Guidelines, approved by the Chief Sustainability Officer (Version No. 2.0, approved in Jan-2024), signify Sime Darby Plantation Berhad's commitment to gender equality and inclusivity within its operations.</p> <p>At both operating and regional levels, Gender Committees have been established with the objective of raising awareness of company policies and addressing gender-related issues. Meetings are conducted every six months, with documented minutes verifying discussions and issue resolutions.</p> <p>At each operational units within Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit, Gender Committees have been formed, each chaired by a designated officer. Recent meeting dates and activities for each committee are as follows:</p> <p>(1) Bukit Kerayong Estate: A Gender & Child Protection Committee, chaired by the Store Clerk, held meetings on 24/11/2023, 22/09/2023, 15/07/2023, and 07/04/2023.</p> <p>(2) Bukit Cheraka Estate: A Women's Committee, led by the Chief Clerk, convened meetings on 11/01/2024, 22/12/2023, 25/10/2023, and 13/08/2023.</p> <p>(3) Bukit Kerayong Palm Oil Mill (POM): A Gender Committee, chaired by the Weighbridge Operator, held meetings on 14/02/2024, 23/01/2024, 27/10/2023, and 28/07/2023.</p> <p>These committees serve as vital mechanisms for addressing gender-related concerns and fostering a culture of inclusivity and equality within Sime Darby Plantation Berhad's operations.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Based on the review of employment contracts and monthly pay slips, it has been confirmed that each operating unit within the Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification</p>	Complied

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		<p>Unit ensures equal pay for the same scope of work irrespective of gender and nationality. The evidence indicates that all workers are remunerated in accordance with the Minimum Wages Order 2022 and the Collective Agreement between MAPA and NUPW.</p> <p>Interviews conducted with sampled workers corroborate this finding, and documentation such as pay slips and punch cards for the months of April 2023, August 2023, and December 2023 further support the adherence to fair pay practices across the board.</p>	
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	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Collective agreement between Sime Darby Plantation Berhad and national union of plantation workers (NUPW) for Palm Oil Mill Employees, 2020 registered 09/03/2020 valid until December 2022 reference number COG. NO: 057/2020. Other than all operating units complies with Minimum Wage Order 2022 at rate RM1,500/months, RM57.69/day or RM7.21/hour. The latest CA was still pending endorsement by both parties and the cases still in industrial court.</p> <p>In addition to management's explanation of the collective agreement to each employee, local NUPW committees for each operating unit disseminate information about the agreement to their members. This ensures that all employees are informed about their rights and entitlements under the collective agreement, fostering transparency and cooperation within the workforce. The term and condition was according to national languages.</p>	Complied
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for</p>	<p>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</p>	Complied

	<p>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>employment duration, working hours, 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 Employment Act of 1955, 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. Document verification was done and 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. It is noteworthy that none of the sampled employees had family members engaged in any work within this context.</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>For all operating units, 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>	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 such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on</p>	<p>The essential services and amenities available to workers in the company-provided housing include electricity, water, and domestic waste disposal. The government supplies electricity, and the cost is deducted from the employees' salaries. Regarding water, the</p>	Non-compliance

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	<p>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.</p> <p>- Critical (Major) compliance -</p>	<p>company offers up to 35 gallons per employee per day at no cost, and any additional usage is subject to charges based on prevailing domestic rates. The budget for housing repairs, sanitation, garden maintenance, as well as CAPEX and OPEX across all operating units has been reviewed.</p> <p>The records for weekly on-site inspections by the Medical Assistant (estate) and QA (mill) are examined on a fortnightly basis in accordance with the Workers Minimum Housing and Amenities Regulation 2020.</p> <p>Workers Housing Management Procedure and 'OilPalmPal' Digital Housing Complaint System (OPP DHCS). Inter-office mail (Ref. No: UM/HSE/013/11/2021), dated 26/11/2021 from CEO Upstream Malaysia. General house rule is written under "Peraturan Umum Kompleks Perumahan Pekerja".</p> <p>For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g., mattress, cooking utensils).</p> <p>However, the condition of the surrounding linesite area is unsatisfactory as sighted below:</p> <ol style="list-style-type: none"> 1. Location: Bukit Kerayong Palm Oil Mill and Bukit Cheraka Estate <p>Section 23 (1) of Employees' Minimum Standards of Housing, Accommodations and Amenities Act 1990 (Act 446) stated: It shall be the duty of the employer of a place of employment where employees and their dependants are provided with housing accommodation to ensure that — (a) the area surrounding the employees' housing is kept clear of undergrowth and maintained in a clean and sanitary condition;</p>	
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		<p>(b) the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water; (c) all refuse in the housing site is collected daily and disposed of satisfactorily; and (d) all communal latrines and bathrooms are kept in a clean, sanitary and working condition. However, upon conducting a site visit in the linesite area, it was observed that there are domestically generated wastes such as plastic bottles, used mattresses, and food containers/wrappers that are not being appropriately managed/disposed. Stagnant water was also noted in perimeter drains, and undergrowth grass was observed growing in both perimeter and main drains. These observations are contravening the stipulations outlined in Section 23 (1) of Act 446.</p> <p>2. Location: Bukit Cheraka Estate</p> <p>Workers Housing Management Procedure 2022 Section 4.1.9 states "Employees are responsible in maintaining good house cleanliness and hygiene including prohibition to open burning, chemical spraying, wildlife keeping". However, during site visit at the linesite area, two instances of open burning activities were identified – one behind a house and another at the designated waste collection point before the local authorities' collection. These activities are not aligned with Workers Housing Management Procedure 2022 Section 4.1.9.</p> <p>Therefore, Major NC was raised against this indicator.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There are sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient, and affordable foods and goods. Price of goods was displayed at the sundry shops. Workers'</p>	Complied

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		interview confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town.	
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p>	<p>Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. 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.</p> <p>The management conducted Prevailing Wage Assessment based on check-roll worker for period 2023 and published in January 2024. Total received per month as below:</p> <ul style="list-style-type: none"> Local worker = RM 2,150.75 per month Foreign worker = RM 2,224.73 per month 	Complied

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	<p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
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>The core job in Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit are exclusively carried out by permanent, full-time employees. No temporary or contract workers have been engaged in these operations. The estate has, however, enlisted the services of a contractor for the transportation of FFBs and EFBs, and these workers maintain a permanent presence within the estate's operations.</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>Freedom of Associations Statement was endorsed by respective OU Manager stated, "the Company is in full respect and with no intention of obstruction for workers to get involve in Workers Union Act 1959" and "the Company also allows each worker that is eligible to be represent by the union if there is any argument that will be discussed accordingly to the Collective Agreements basis".</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>NUPW Committee was established in Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit and sighted minutes meeting for latest meeting. Management plan was developed for the issues raised by the NUPW representatives and action has been taken accordingly. Interviewed with the NUPW representatives confirmed that the issues raised during the meeting were resolved. He informed that there is no further pending issue reported during the time of audit. The minutes meeting has been established in Bahasa Malaysia. Latest meeting at Bukit Kerayong POM conducted on 24/10/2023, Bukit Kerayong Estate on 05/12/2023, and Bukit Cheraka Estate on 06/02/2024.</p>	Complied
6.3.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The NUPW Committee Members are democratically elected by the members during the Biennial General Meeting. Following the election process, NUPW Cawangan Selangor notifies the management of each operating unit regarding the newly elected committee members. Sighted memos dated as follows:</p> <ul style="list-style-type: none"> • Memo Ref. No. NUPW/SSB/OM:007/24, dated 01/02/2024, informing Bukit Kerayong Palm Oil Mill management of the latest NUPW Committee Members. • Memo Ref. No. NUPW/SSB/E:006/23, dated 12/06/2023, informing Bukit Kerayong Estate management of the latest NUPW Committee Members. 	Complied

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		<ul style="list-style-type: none"> Memo Ref. No. NUPW/SSB/E:002/23, dated 18/01/2023, informing Bukit Cheraka Estate management of the latest NUPW Committee Members. <p>These memos serve to officially communicate the composition of the NUPW Committee to the respective management teams, facilitating collaboration and communication between the union and management.</p>	
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>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.</p> <p>- Minor compliance -</p>	SDP has established policy to protect children and prohibition of child labour which has clearly stated in clause 3.3 Respect and Uphold Children's Rights which clearly stated commitment of the management to recognise that protect wellbeing of children and from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography by. Sighted in clause 3.3.1 Eradicating child labour in all operating units and will not employ anyone under the age of 18 years.	Complied
6.4.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	As per verification through the master list, there is evidence that the minimum ages requirement (18 years) has been met. It also has been further verified based on the personal file and interview with sample workers. Site visit has been conducted as additional method to confirm compliance. Age screening process has been documented in the Guidance on recruitment of local workers dated 30/08/2023 where any application received need to include with identity cards and for migrant workers it has been documented in Migrant workers recruitment procedure year 2021.	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p>	There are no young persons that has been recruited in all operating units under Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit and has been verified based on master list of	Complied

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	- Critical (Major) compliance -	workers, interview with sample workers and site visit. It also has been clearly mentioned in the Human Eight Charter revised 2020 clause 3.3 Respect and Uphold Children's Rights 3.3.1; Eradicating child labour in our supply chain and SDP will not employ anyone under the age of 18 years.	
6.4.4	<p>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.</p> <p>- Minor compliance -</p>	Communication of the policy has been done through the stakeholders' consultations that that has been conducted on 24/08/2023 with attendance for various stakeholders for all operating units under Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Stated in the Human Right Charter revised in 2020 in clause 3.2.6 which the management of the Sime Darby Plantation Berhad is committed in creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict.</p> <p>Verification has been done by the auditor in term of implementations of the procedure where all the workers has been communicated on the policy and prohibition to do any types of harassment. There are no cases of harassment happen in all operating units.</p> <p>For external stakeholders, the communication of the policy has been conducted through stakeholders' consultations held on 23/01/2024. These consultations were attended by various stakeholders representing all operating units under Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit. Additionally, policy</p>	Complied

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		dissemination has been ensured to all workers through regular workers' meetings and assembly sessions.	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Stated in the Human Right Charter revised in 2020 in clause 3.2.5 which the management of the Sime Darby Plantation Berhad is committed to facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. Implementation of the procedure has been verified where there is no prohibition for the local workers to pregnant and deliver.</p> <p>For external stakeholders, the communication of the policy has been conducted through stakeholders' consultations held on 23/01/2024. These consultations were attended by various stakeholders representing all operating units under Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit. Additionally, policy dissemination has been ensured to all workers through regular workers' meetings and assembly sessions.</p>	Complied
6.5.3	<p>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.</p> <p>- Minor compliance -</p>	<p>As verified during on-site interview with relevant stakeholders, management of mill and estates within Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit conducted the assessment of new mothers in consultation with new mothers and taken actions to address their needs.</p> <ul style="list-style-type: none"> • Bukit Kerayong POM: 1 new mother (with infant under 24 months). The assessment conducted on 28/07/2023 by Assistant Engineer. Based on the assessment, the new mother mentioned that no needs requested as the baby taken care by the family member. • Bukit Kerayong Estate: No new mother (with infant under 24 months) since last assessment 	Complied

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		Bukit Cheraka Estate: 2 new mothers (with infant under 24 months). The assessment conducted on 06/02/2024 by Clinic Assistant. Based on the assessment, both mothers mentioned that no needs requested as the baby taken care by respective family member. 1 mother was removing from pesticide and fertilizer application works as the baby is breastfeeding.	
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 -	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.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited: <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 • Lack of freedom of workers to resign • Penalty for termination of employment 	As per verification through interview and documentation, there is evidence that all workers included migrant workers has been recruited voluntarily. <ul style="list-style-type: none"> i) There is no retention of passport has been practised for each operating unit. It has been verified base interview through interview with sample of migrant workers during the site visit at workers quarters. As per respond, the workers said that they only need submit their passport for permit renewal. ii) As per interview, there is no recruitment fees has been charged to all newly recruited workers for both local and migrant workers. All the workers that have been interviewed recruited 	Complied

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	<ul style="list-style-type: none"> • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>for free from the origin countries until the allocated estates. Sample has been taken for recruitment done in year 2023.</p> <p>iii) There is no contract substitution has been practices which has been confirmed through interview. All the workers responded that they are aware that they will locate at Sime Darby Plantation Berhad and works as plantation workers and decision on which operating units will be decided at induction centre located at Bukit Kerayong Estate.</p> <p>iv) For all operating units, there is absence of involuntary overtime, a fact that has been verified through interviews. Workers expressed that they have the freedom to decline overtime if they are unwilling to take on additional hours. Furthermore, the workers conveyed that they find greater satisfaction in willingly engaging in overtime rather than remaining at home.</p> <p>v) There is no withholding of wages has been practices where wages have been paid through bank account. It has been confirmed based on interview and verification of salary payment and sample has been taken for month April 2023, August 2023, and December 2023.</p> <p>vi) No debt bondage or debt has been provided to all the workers. It has been verified based on the pay slips and interview with the workers.</p> <p>All workers that have been recruited is free to resign as per stipulated in the employment contract. However, the workers are tied with agreement to provide notice prior to resignation and there is no penalty has been issued for any resignation.</p>	
6.6.2	(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	Sime Darby Plantation Berhad has established specific procedure for migrant workers which has been established in the document title	Complied

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	<p>- Critical (Major) compliance -</p>	<p>Migrant Worker Responsible Recruitment Procedure year 2021. The objective of the procedure is to ensure that our workforce is hired ethically and responsibly.</p> <p>Stated in the procedure that clear and transparent term and condition need to be provided to all migrant workers and there is no retention of passport.</p> <p>Verification has been done by sample of migrant workers found out that all workers has been provided with transparent and clear employment contract and has been signed by both parties. Interview with the workers also confirmed that they have been provided copy of the employment contact.</p> <p>Passport has been kept by the workers itself. During site visit to workers housing, the auditor asked the workers to show the passport and there is evidence it has been kept at the house.</p> <p>From the verification, there is evidence that the procedure has been implemented by the management of each operating units.</p>					
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>Bukit Kerayong Palm Oil Mill has appointed the Mill Sr Assistant Manager In Charge to be the OSH Committee Chairman dated 03/012023. The appointment was made by Regional Chief Executive Officer.</p> <p>The safety meeting was conducted at mill once every three months: Sighted the records of the meeting:</p> <table><tr><td>No</td><td>Meeting date</td></tr><tr><td>1</td><td>07/12/2023</td></tr></table>	No	Meeting date	1	07/12/2023	Complied
No	Meeting date						
1	07/12/2023						

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		<table><tr><td>2</td><td>08/09/2023</td></tr><tr><td>3</td><td>09/06/2023</td></tr><tr><td>4</td><td>09/03/2023</td></tr></table>	2	08/09/2023	3	09/06/2023	4	09/03/2023						
		2	08/09/2023											
		3	09/06/2023											
		4	09/03/2023											
		<p>During these meetings, the well-being and safety of all involved parties are addressed, with any raised concerns being duly noted.</p> <p>Bukit Kerayong Estate has appointed Estate Manager to be the OSH Chairman for Bukit Kerayong Estate dated 06/07/2023. The appointment was made by Regional Chief Executive</p> <p>The estate has conducted the safety meeting which are done once every three months. Sample sighted regarding the meeting; details are as the following:</p>												
		<table><tr><td>No</td><td>Meeting date</td></tr><tr><td>1</td><td>20/12/2023</td></tr><tr><td>2</td><td>21/09/2023</td></tr><tr><td>3</td><td>21/06/2023</td></tr><tr><td>4</td><td>31/03/2023</td></tr></table>	No	Meeting date	1	20/12/2023	2	21/09/2023		3	21/06/2023	4	31/03/2023	
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<p>During these meetings, the well-being and safety of all involved parties are addressed, with any raised concerns being duly noted.</p> <p>Bukit Cheraka Estate has appointed Estate Manager to be the OSH Chairman for Bukit Cheraka Estate, dated 03/01/2023. The appointment was made by Regional Chief Executive</p>														

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		<p>The estate has conducted the safety meeting which are done once every three months. Sample sighted regarding the meeting; details are as the following:</p> <table><tr><th>No</th><th>Meeting date</th></tr><tr><td>1</td><td>19/01/2024</td></tr><tr><td>2</td><td>20/10/2023</td></tr><tr><td>3</td><td>24/07/2023</td></tr><tr><td>4</td><td>25/04/2023</td></tr></table> <p>During these meetings, the well-being and safety of all involved parties are addressed, with any raised concerns being duly noted.</p> <p>The agenda of the meeting as the following:</p> <ol style="list-style-type: none">1. Chairman’s Opening Speech2. Previous meeting conformation3. OSH policy4. HIRARC Checking5. CHRA Checking6. Health Surveillance Report7. Health Assessment8. PPE9. Emergency Response Plan10. Workplace Inspection	No	Meeting date	1	19/01/2024	2	20/10/2023	3	24/07/2023	4	25/04/2023	
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		11. Other issues related to OSHA	
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>The management of Bukit Kerayong Estate, Bukit Cheraka Estate has established the Accident/Incident Management Flow Chart. The chart is divided into three main clause which are the near miss, minor accident and major accident. Training has been conducted at each site on the emergency procedure. Interview with the workers found that they understood the flow if any emergency happened during working hour as well as off hours.</p> <p>Trained and certified first aid personnel were stationed within the operating units. During visits to the mill and estates, it was observed that each station and group had access to first aid kits. Conversations with the designated first aid providers revealed their proficiency in utilizing the contents of the first aid boxes. These boxes undergo regular supervision by Hospital Assistants from the mill and estate, ensuring the replenishment of used items and the replacement of expired ones. Comprehensive records of utilized items are diligently maintained and kept within the boxes.</p> <p>Accidents records are available at each site with the summary of accidents happened is sighted in JKKP 8 forms. Details of JKKP 8 reviewed in clause 6.7.5</p>	Complied
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 visited mill and estates ensured the provision of suitable personal protective equipment (PPE) based on job roles, following the guidelines outlined in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC) framework and the Personal Protective Equipment (PPE) Procedure, UM/HSE/OCP/03 dated 09/03/2021.</p> <p>All employees have been furnished with appropriate PPE at no cost, in accordance with management regulations. During the on-site assessment of the Spraying Gang and Manuring Gang, as well as</p>	Non-compliance

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		<p>visits to the storage areas of the respective estates and mill, it was observed that personnel were properly attired in the provided PPE.</p> <p>Moreover, the estates have well-maintained facilities that enable workers to sanitize themselves before departing from work. The showers were found to be in excellent working condition.</p> <p>Site visit at Bukit Kerayong Palm Oil Mill EFB yard found that contractor were working on top of the lorry covering the EFB with canvas. The contractor was not wearing proper safety harness while working on top of the lorry.</p> <p>Site visit at boiler station found that a worker working at the station without proper PHP.</p> <p>This is not in line with the PPE matrix develop by the mill, which stated that working at height must be equipped with safety harness and workers working at boiler station must be wearing PHP. Thus Major NC is raised.</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>All workers is provided with medical care and covered by accident insurance as required by Malaysian law. This ensures that any costs resulting from work-related incidents causing injury or sickness are appropriately addressed. Such measures prioritize the well-being and safety of workers, promoting responsible and compliant practices in line with legal requirements. Sighted the record of SOCSO Contribution for each estate as the following:</p> <p>Bukit Kerayong Estate</p> <table><tr><th>Month</th><th>Total Workers</th><th>Contribution (RM)</th></tr><tr><td>August 2023</td><td>202</td><td>8,842.70</td></tr><tr><td>October 2023</td><td>199</td><td>8,594.40</td></tr></table>	Month	Total Workers	Contribution (RM)	August 2023	202	8,842.70	October 2023	199	8,594.40	Complied
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>All accidents incidents are reviewed during the quarterly held safety meetings in the operating units. Records on Lost Time Accident (LTA) are maintained and presented during the meetings. Accident records were updated and available for verification. JKPP 8 have been submitted to DOSH accordingly and available for verification.</p> <p>Bukit Kerayong Palm Oil Mill has submitted the JKPP 8 form to DOSH dated 12/01/2024 (Ref No: JKPP8/162778/2023), 39 days of LTI recorded with 3 accidents.</p>	Complied																											

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		<p>Bukit Kerayong Estate, 24 accidents recorded with 49 days of LTI. The incident is documented under JKKP 8 - JKKP8/167773/2023, with a date of 23/01/2024.</p> <p>Bukit Cheraka Estate, 8 accidents reported, with 61 days of LTI. The incident were reported to JKKP through JKKP8 on 11/01/2024.</p>	
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	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have developed Integrated Pest Management (IPM) plans to effectively control pests and reduce chemical usage. Here are the plans established for each estate:</p> <p>Bukit Cheraka Estate:</p> <ul style="list-style-type: none"> Planting beneficial plants extensively in immature areas. Implementing IPM planting of beneficial plants in areas prone to bagworm attacks. Conducting IPM bagworm refreshment training. Installing barn owl boxes to achieve a target ratio of 1 box per 10 hectares. <p>Bukit Kerayong Estate:</p> <ul style="list-style-type: none"> Following calendar baiting religiously as per the programmed schedule. Conducting rat damage census in immature areas and initiating treatment when fresh damage reaches 5%. Increasing owl population by installing barn owl boxes at a ratio of 1 box per 10 hectares. 	Complied

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		<ul style="list-style-type: none"> Monitoring owl population through census every 6 months. Expediting the establishment of beneficial plants for integrated pest management. <p>The estates monitor the implementation of the management plan. During a site visit at P08D, it was observed that the beneficial plants were well established.</p>	
7.1.2	<p>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.</p> <p>- Minor compliance -</p>	<p>None of the plant species mentioned, which are referenced in the Global Invasive Species Database and CABI.org, are utilized in their IPM management. In SOU 7, three plant species were employed for IPM, including <i>Tunera subulata</i>, <i>Cassia cobanensis</i>, and <i>Antigonan leptopus</i>.</p>	Complied
7.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no evidence or records indicating the use of fire for pest control at any of the estates visited. This practice is explicitly addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement, signed by the Group Managing Director on 02/12/2019, supported by SDP Responsible Agriculture Charter under section 3.2: Protect and enhance forest. The policy states:</p> <p>"We will seek to protect and enhance forest and wildlife, and minimise carbon emissions from land use change through:</p> <p>Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as protective firefighting measures in and around our operation."</p>	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			

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7.2.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Plantation Agricultural Reference Manual, issue:2 dated June 2021. Selected products are specific to the target pest, weed and disease.	Complied																	
7.2.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The estate has established the record of pesticides for all field. The a.i per hectare is available for all estate. Sample taken as below.</p> <table><tr><td>Estate</td><td>Month</td><td>a.i (kg)/hectare</td></tr><tr><td rowspan="3">Bukit Kerayong</td><td>Oct 2023</td><td>0.11</td></tr><tr><td>Nov 2023</td><td>0.12</td></tr><tr><td>Dec 2023</td><td>0.08</td></tr><tr><td rowspan="3">Bukit Cheraka</td><td>Aug 2023</td><td>0.05</td></tr><tr><td>June 2023</td><td>0.02</td></tr><tr><td>Apr 2023</td><td>0.01</td></tr></table>	Estate	Month	a.i (kg)/hectare	Bukit Kerayong	Oct 2023	0.11	Nov 2023	0.12	Dec 2023	0.08	Bukit Cheraka	Aug 2023	0.05	June 2023	0.02	Apr 2023	0.01	Complied
Estate	Month	a.i (kg)/hectare																		
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	June 2023	0.02																		
	Apr 2023	0.01																		
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual (ARM), Section 15 Plant Protection [Issue No. 2 dated June 2021] and Section 16 Weed Control [Issue No. 2 dated June 2021]. The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. The implementation in the field is consistent with the SOP established. Among the IPM plans implemented by the	Complied																	

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		estates were establishment of beneficial plants (e.g., antigonan, tunera and cassia) and barn owl (<i>Tyto alba</i>). Sighted during the site visit at the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	There is no evidence of prophylactic use of pesticides in the estates.	Complied
7.2.5	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 process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: 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. - Minor compliance -	Sighted in the Chemical Registers showed that only class III & IV chemicals were used at the estates. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used.	Complied

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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>The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application. The training was conducted by the personnel with knowledge on pesticide application such as Estate Manager, Asst. Manager and pesticide supplier. Reviewed of training records at Bukit Kerayong Estate dated 21/03/2023, and Bukit Cheraka dated 29/11/2023. Interview was conducted to the pesticide operator and found their awareness was in order.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>In accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations, the mill and estate's Chemical Store were found to contain stored pesticides. The stores remained locked at all times, and during the visit, the store clerk was observed unlocking the padlock to open the entrance door for the auditor to inspect the store. A prominently displayed sign at the entrance door indicated the requirement to wear personal protective equipment (PPE). The Chemical Store also had signage displaying the necessary Hazard Symbols at the entrance. The facility's ventilation fan was operational, ensuring adequate ventilation. Additionally, an up-to-date chemical register, including the trade and generic names of the stored pesticides, as well as their Safety Data Sheets, were readily available</p>	Complied
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 practice observed involves repurposing all chemical containers as premix containers for transporting diluted chemicals to the fields for application. Alternatively, any unused chemical containers are subjected to a triple rinsing process and subsequently punctured prior to disposal. These punctured containers are then collected by licensed schedule waste collectors for recycling purposes.</p>	Complied

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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>	Pesticide application by aerial spraying is not practiced in Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit.	Complied
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>Each operating unit conducted the annual medical surveillance for chemical handlers that are working at each operating unit. Records of medical surveillance is as the following:</p> <p>Bukit Kerayong Estate</p> <p>The management has conducted the medical surveillance dated 08/05/2023, for 60 workers. All workers are declared fit to work by OHD.</p> <p>Bukit Cheraka Estate</p> <p>The management has conducted the medical surveillance dated 05/12/2023, for 30 workers. All workers are declared fit to work by OHD.</p>	Complied
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>All estates have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on 05/05/2022. It was sighted during the visit to the stores there were signage stating that pregnant and breast-feeding women are not allowed to enter the chemical stores.</p> <p>As per verification with master list of workers, medical surveillance report, interview with management and site visit, it was confirmed that there is no under age of 18, pregnant or breastfeeding women and other people that have medical restrictions was assigned for</p>	Complied

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		chemical related works in the two estates visited. If there is any workers having medical restrictions as per examination during medical surveillance, they will be offered alternative equivalent work in the estates.	
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	Addressed in the Waste Management Procedure for Estates & Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01, waste management is categorized as follows: 1. Scheduled Waste 2. Hazardous Waste 3. Non-Hazardous Waste 4. Industrial Waste 5. Construction Waste 6. Agricultural Waste 7. Office Waste 8. General Waste	Complied
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	The procedure for managing scheduled waste has been established, as outlined in the Waste Management Procedure for Estates & Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01. Additional reference was made to the Guidelines for Packaging, Labelling, and Storage of Scheduled Wastes in Malaysia.	Complied

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		<p>Awareness training on scheduled waste management has been conducted on the following dates:</p> <p>Bukit Cheraka Estate: 18/10/2023</p> <p>Bukit Kerayong Estate: 18/10/2023</p> <p>Bukit Kerayong POM: 19/09/2023</p> <p>Interviews with the person in charge and workers revealed that they have a good awareness of scheduled waste management practices.</p> <p>Record of Inventory of Schedule Waste and Disposal Record as per details below:</p> <p>Bukit Cheraka Estate</p> <p>Inventory</p> <ul style="list-style-type: none"> • File reference Number: (B)B11/123/000/016 • Date Reporting: 19/02/2024 • Waste Generated: SW102, SW305, SW404, SW409, SW410. <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 2023122308DOJE53 • Date Disposal: 23/12/2023 • SW409 – Clinical waste: 0.490 MT by Pentas Flora Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> • Disposal consignment note: 2023122308KPT7YU • Date Disposal: 23/12/2023 	
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		<ul style="list-style-type: none"> SW410 – Contaminated PPE: 0.5600 MT by Pentas Flora Sdn Bhd <p>Bukit Kerayong Estate</p> <p>Inventory</p> <ul style="list-style-type: none"> File reference Number: (B)B11/123/000/017 Date Reporting: 29/12/2023 Waste Generated: SW102, SW305, SW404, SW409, SW410. <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 2023081611YO7F56 Date Disposal: 16/08/2023 SW305 – Spent Lubricating Oil: 5.2000 MT by Pentas Flora Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> Disposal consignment note: 2023081610L62UCI Date Disposal: 16/08/2023 SW410 – Used Rags and Filters – 0.9150 MT by Pentas Flora Sdn Bhd <p>Bukit Kerayong POM</p> <p>Inventory</p> <ul style="list-style-type: none"> File reference Number: JAS.BHQ.600-3/1/10 Date Reporting: 01/02/2024 	
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		<ul style="list-style-type: none"> Waste Generated: SW305, SW322, SW409, SW410. <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 20230926165VWCP1 Date Disposal: 26/09/2023 SW322 – Filters: 0.2700 MT by Pentas Flora Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> Disposal consignment note: 2023092616F8XZDV Date Disposal: 26/09/2023 SW410 – Filters: 0.2000 MT by Pentas Flora Sdn Bhd 	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>During visits to all estates, no evidence was found of fire being used for waste disposal. Domestic waste was collected by the municipal authorities, specifically the MPKS (Majlis Perbandaran Kuala Selangor), and disposed of at the municipal landfill.</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>A Standard Operating Procedure (SOP) for managing soil fertility to optimize yield and minimize environmental impacts has been established. The preservation of soil fertility is guided by the organization's SOPs, which include the following sections from various documents:</p> <ul style="list-style-type: none"> EQMS chapter B8: Leguminous Cover Crops EQMS chapter B14: Manuring ARM Section 8: Manuring 	Complied

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7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Foliar and soil sampling were conducted by the Research and Development Department prior to fertilizer recommendations for the upcoming financial year. Leaf and soil nutrient analyses are standard practices for diagnosing fertilizer requirements in oil palms. Leaf sampling is typically conducted annually, while soil sampling is done at five-year intervals.</p> <p>Sampling records were reviewed as follows:</p> <p>Bukit Cheraka Estate:</p> <ul style="list-style-type: none"> • The latest soil sampling was conducted on 04/08/2022, as indicated in report no. S57/2022 dated 07/10/2022. • The latest leaf sampling was conducted on 19/07/2023, as indicated in report no. P407/2023 dated 02/09/2023. <p>Bukit Kerayong Estate:</p> <ul style="list-style-type: none"> • The latest soil sampling was conducted on 18/03/2022, as indicated in report no. S30/2022 dated 27/04/22. • The latest leaf sampling was conducted on 20/12/2023, as indicated in report no. P48/2024 dated 29/01/2024. 	Complied
7.4.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The mill disposed EFB by send to neighbouring sister estate as nutrient recycle program. Reviewed the EFB disposal records FY 2022 as follows:</p> <p>The following practices are applied in the estates in relation to the nutrient recycling strategy;</p> <ol style="list-style-type: none"> 1. EFB application in designated fields at dosage of 35 mt/ha applied in inter rows subject to Agronomist recommendations. 2. Cut frond are stacked in between the palm's rows left to 	Complied

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		<div>discompose.</div> <div>The estate has established EFB and Bio-Compost application program FY 2023. Reviewed the application records as to date December 2023 as follows:</div> <table><tr><td>Estate</td><td>EFB Transported for Field Application (MT)</td></tr><tr><td>Bukit Cheraka Estate</td><td>P2009B, P2009A, P2013C, P2009C</td></tr><tr><td>Bukit Kerayong Estate</td><td>P2011A, P2009C, P2022A</td></tr></table>	Estate	EFB Transported for Field Application (MT)	Bukit Cheraka Estate	P2009B, P2009A, P2013C, P2009C	Bukit Kerayong Estate	P2011A, P2009C, P2022A	
Estate	EFB Transported for Field Application (MT)								
Bukit Cheraka Estate	P2009B, P2009A, P2013C, P2009C								
Bukit Kerayong Estate	P2011A, P2009C, P2022A								
7.4.4	<div>Records of fertiliser inputs are maintained.</div> <div>- Minor compliance -</div>	<div>Fertilizer application was carried out based on recommendations provided by agronomists, which were derived from foliar sampling conducted. Records of fertilizer application were accessible for review at the visited estate. The estate reported the fertilizer application to the Research and Development Carey Island. For details, refer to the 2023 and 2024 Fertilizer Programme and Application Record.</div>	Complied						
Criterion 7.5: Practices minimise and control erosion and degradation of soils.									
7.5.1	<div>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</div> <div>- Critical (Major) compliance -</div>	<div>Soil maps were readily available at all estates, delineating the various soil series and their respective area percentages within the estate boundaries. Notably, there were no marginal or fragile soils identified across the assessed estates. During field visits to the estates, it was observed that there were no oil palm plantings on steep terrains.</div> <div>In Bukit Cheraka Estate, new planting was undertaken in 2019, converting an area of 11.95 hectares from a nursery to oil palm within the certified area. Environmental assessments, including SEIA dated 28/11/2018, LUCA, and Carbon Stock Assessment</div>	Complied						

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		<p>conducted in 2018, ensured that the new planting adhered to company policies and established Standard Operating Procedures (SOPs).</p> <p>There is no new oil palm plantings were initiated on steep terrain. This was verified through site visits, interviews, and document verification processes.</p>	
7.5.2	<p>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.</p> <p>- Minor compliance -</p>	<p>The commitment to protect and conserve biodiversity and ecosystems is articulated in the Sime Darby Plantation Group Sustainability and Quality Policy Statement, signed by the Group Managing Director on 2/12/2019, as well as the Responsible Agriculture Charter. Under section 3.1 of the Responsible Agriculture Charter, specifically 3.1.2, it is stated:</p> <p>"Management of erosion by protection of steep slopes and river reserves within our operations and promote restoration programs."</p> <p>This underscores the company's dedication to managing erosion risks by safeguarding steep slopes and river reserves within its operations, while also actively promoting restoration efforts in relevant areas.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>New planting activities were carried out in 2019 within Bukit Cheraka Estate, involving the conversion of 11.95 hectares from a nursery to oil palm within the certified area. Environmental assessments, including SEIA dated 28/11/2018, LUCA, and Carbon Stock Assessment conducted in 2018, ensured compliance with company policies and established Standard Operating Procedures (SOPs).</p> <p>There were no new oil palm plantings were undertaken on steep terrain. This was verified through thorough site visits, interviews, and document verification processes.</p>	Complied

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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.			
7.6.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series and topography maps were observed at the sampled estates, revealing no categorization of fragile soils within the sampled estates. During planning for replanting, the estate considered factors such as land terrain, drainage, and road systems. The table below illustrates the identified soil series for each estate:</p> <p>Estate Soil Series</p> <p>Bukit Cheraka Estate - Bernam, Bungor, Colluvium, Local Alluvium, Malacca, Munchong, Organic Clay, Sedu, Selangor, Serdang, Tongkang, Unclassified</p> <p>Bukit Kerayong Estate - Bernam, Jawa, Sedu, Selangor, Serdang, Tongkang, Bria, Kankong</p> <p>New planting activities in Bukit Cheraka Estate were carried out in 2019, involving the conversion of 11.95 hectares from a nursery to oil palm within the certified area. Environmental assessments, including SEIA dated 28/11/2018, LUCA, and Carbon Stock Assessment conducted in 2018, ensured compliance with company policies and established Standard Operating Procedures (SOPs).</p> <p>During verification through site visits, it was confirmed that the new planting did not involve planting on marginal or fragile soils.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Soil series and topography maps were available for the sampled estates, and no fragile soil was categorized within these estates. In planning for replanting, the estate considered factors such as land terrain, drainage, and road systems.</p> <p>New planting activities were conducted in Bukit Cheraka Estate in 2019, involving the conversion of 11.95 hectares from a nursery to</p>	Complied

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		oil palm within the certified area. Environmental assessments, including SEIA dated 28/11/2018, LUCA, and Carbon Stock Assessment conducted in 2018, ensured compliance with company policies and established Standard Operating Procedures (SOPs). Verification through site visits at the conversion area of 11.95 hectares from the nursery to oil palm confirmed that planting did not occur on marginal or fragile soils.																								
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	<div>The Agronomy Advisory and Services Department carried out assessments and supplied the estates with topography maps. Below are the sampled topography details observed at the estates:</div> <table><tr><th rowspan="2">Degree</th><th colspan="2">Percentage, %</th></tr><tr><th>Bukit Cheraka Estate</th><th>Bukit Kerayong Estate</th></tr><tr><td>0°-2° Flat</td><td>89.81</td><td>97.41</td></tr><tr><td>2°-6° Undulating</td><td>4.54</td><td>2.11</td></tr><tr><td>6°-12° Rolling</td><td>2.49</td><td>0.35</td></tr><tr><td>12°-20° Gentle Slope</td><td>1.72</td><td>0.10</td></tr><tr><td>20°-25° Hilly</td><td>0.87</td><td>0.03</td></tr><tr><td>>25° Steep</td><td>0.57</td><td>0.01</td></tr></table> <div>In 2019, new planting took place in Bukit Cheraka Estate, converting an area of 11.95 hectares from a nursery to an oil palm plantation within the certified area. Prior environmental assessments, including SEIA dated 28/11/2018, LUCA, and Carbon Stock Assessment in</div>	Degree	Percentage, %		Bukit Cheraka Estate	Bukit Kerayong Estate	0°-2° Flat	89.81	97.41	2°-6° Undulating	4.54	2.11	6°-12° Rolling	2.49	0.35	12°-20° Gentle Slope	1.72	0.10	20°-25° Hilly	0.87	0.03	>25° Steep	0.57	0.01	Complied
Degree	Percentage, %																									
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>25° Steep	0.57	0.01																								

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		<p>2018, were conducted. The new planting adhered to company policies and established Standard Operating Procedures (SOPs).</p> <p>Verification through on-site visits confirmed that the conversion area of 11.95 hectares from the nursery to the oil palm plantation did not involve planting on marginal or fragile soils, nor on steep terrain.</p>	
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	Peat soil was not identified at any of the estates visited within SOU 7. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	Not Applicable
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	Peat soil was not identified at any of the estates visited within SOU 7. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	Not Applicable
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	Peat soil was not identified at any of the estates visited within SOU 7. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p>	Peat soil was not identified at any of the estates visited within SOU 7. Verification conducted through site visits, document checks, and	Not Applicable

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	- Critical (Major) compliance -	interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	
7.7.5	<p>(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.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	Peat soil was not identified at any of the estates visited within SOU 7. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	Not Applicable
7.7.6	<p>(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.</p> <p>- Critical (Major) compliance -</p>	Sime Darby Plantation Berhad has established SOP on Agricultural Reference Manual dated 01/07/2008 Section 10.4.1 titled Water Management in Coastal or Peat Planting. There is no new planting at sample estates. There is no peat soil identified at all estates visited in SOU 7. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criteria was not applicable.	Not Applicable
7.7.7	<p>(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 and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the</p>	Peat soil was not identified at any of the estates visited within SOU 7. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in	Not Applicable

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	<p>'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>	the visited estate. Therefore, the criteria regarding peat soil was not applicable.	
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>A water management plan has been established at Sime Darby Plantation Berhad SOU 7 Bukit Kerayong POM Certification Unit, with the plan being reviewed annually. The latest plan covers FY2023 and FY2024, with the following objectives and action plan details:</p> <p>Objectives:</p> <p>To monitor the quality of water at main water inlet/outlet for pollutants from estate operations.</p> <ul style="list-style-type: none"> Analyse water samples by R&D department. <p>Contingency during water shortage:</p> <ul style="list-style-type: none"> Purchase water supply from SYABAS. Treat polluted water with assistance from SYABAS. Conduct flushing during wet seasons. Maintain and monitor screw gate conditions to prevent saltwater intrusion into field drains. <p>Daily consumption:</p> <ul style="list-style-type: none"> Raise awareness among workers on water consumption practices. 	Complied

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		<ul style="list-style-type: none">• Ensure water plugs are tightly closed to prevent water wastage from leaks.• Immediately repair broken pipelines and identify any leakages. Reuse/recycle water: <ul style="list-style-type: none">• Collect wastewater in sump for reuse in pre-mixing.• Conduct desludging as necessary. <p>This plan aims to ensure efficient water management and conservation across the estates, addressing both quality and quantity concerns while promoting sustainable practices.</p>									
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>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. Riparian buffer zones have been identified and demarcated. Signage has been placed. No chemicals and fertilizer application observed been used in their maintenance. In some areas Guatemala grass were planted along the riverbanks. Management of riparian zone is guided by River Reserve Management (Management of River Reserve in Sime Darby Plantation Berhad; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table><tr><th>River width (meter)</th><th>Minimum width for river reserve (m) for peninsular Malaysia and Sarawak</th></tr><tr><td>1-5</td><td>5</td></tr><tr><td>5-10</td><td>10</td></tr><tr><td>10-20</td><td>20</td></tr></table>	River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak	1-5	5	5-10	10	10-20	20	Complied
River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak										
1-5	5										
5-10	10										
10-20	20										

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		<table><tr><td>20-40</td><td>40</td></tr><tr><td>>40</td><td>50</td></tr></table> <p>There is no river and natural waterways at Bukit Cheraka Estate.</p> <p>Sighted the river bufferzone for Sg. Tambak Jawa in field P09B and Sg. Sembilang in field P12A at Bukit Kerayong Estate. No evidence of chemical applications along the buffer zone. The river were desilt on annual basis by the Department Irrigation and Drainage. The estate conducted river water sampling on annually basis.</p> <p><u>Inlet & Outlet</u></p> <ul style="list-style-type: none">• Date of report: 02/11/2023• Report No: IE1430/2023• Date Tested: 27/09/2023 <p><u>Effluent Anaylysis</u></p> <ul style="list-style-type: none">• Date of report: 19/01/2024• Report No: EP41/2024• Date Tested: 02/01/2024 <p>Sample point: Sungai Sembilang Upstream and Downstream, Sungai Tambak Jawa Upstream and Downstream.</p>	20-40	40	>40	50	
20-40	40						
>40	50						
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 effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No overflow was observed, and flow meter reading was recorded daily.	Complied				

Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is quarterly monitored as per OER. Effluent Analysis conducted by accredited laboratory, Sime Darby Plantation Berhad and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. Refer to the latest report for dated October 2022. Monthly analysis was done for final discharge point. Total of 8 parameters (pH, BOD3, COD, TS, SS, TN, AN and O&G) were tested. Latest analysis report for 1st, 2nd, 3rd 4th Quarter quarters of year 2023.

Report Date	Quarter/Week	BOD (Limit=5000mg/L)
10/01/2024	1 st week/1 st month	324.00
	5 th week/2 nd Month	30.00
	9 th week/3 rd Month	34.00
09/10/2023	1 st week/1 st month	191.00
	5 th week/2 nd Month	1230.00
	9 th week/3 rd Month	330.00
06/04/2023	1 st week/1 st month	80.00
	5 th week/2 nd Month	148.00
	9 th week/3 rd Month	3245.00

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		For EFB sighted Disposal Inventory Record submitted to DOE. Refer "Laporan Inventori Pelupusan Tandan Kosong Kelapa Sawit" for the month of January 2024.									
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Bukit Kerayong POM. Average data as below:</p> <table> <tr> <th>Year</th><th>FFB Processed, MT</th><th>Water/L</th><th>Water/FFB</th></tr> <tr> <td>2023</td><td>73,196.52</td><td>61,560.00</td><td>0.84</td></tr> </table>	Year	FFB Processed, MT	Water/L	Water/FFB	2023	73,196.52	61,560.00	0.84	Complied
Year	FFB Processed, MT	Water/L	Water/FFB								
2023	73,196.52	61,560.00	0.84								
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 -	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Management Plan 2022. The document was reviewed/updated on January 2022. Among the Energy Management Plan were:</p> <ul style="list-style-type: none"> i) Worker's housing inspection to ensure no illegal wiring ii) Preventive maintenance programme for estate vehicles iii) Training / Educate workers on fuel saving practices iv) Regular maintenance of transport @ machine as per recommendation <p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p>	Complied								

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		<table><tr><td>Estate / Mill</td><td>Fiber, MT</td><td>Shell, MT</td><td>Usage / FFB (MT)</td></tr><tr><td>Fiber, MT</td><td>8,783.58</td><td>3,659.83</td><td>0.92</td></tr></table> <p>The mill and estate monitored the diesel usage per ton FFB process/production on monthly basis. Reviewed the data FY 2023 as follows:</p> <table><tr><td>Estate / Mill</td><td>Diesel, (MT)</td><td>FFB, (MT)</td><td>Diesel / FFB (MT)</td></tr><tr><td>Bukit Cheraka Estate</td><td>88,852.00</td><td>56,323.48</td><td>1.58</td></tr><tr><td>Bukit Kerayong Estate</td><td>65,756.00</td><td>44,393.91</td><td>1.48</td></tr><tr><td>Bukit Kerayong POM</td><td>1,338.00</td><td>73,196.52</td><td>0.10</td></tr></table>	Estate / Mill	Fiber, MT	Shell, MT	Usage / FFB (MT)	Fiber, MT	8,783.58	3,659.83	0.92	Estate / Mill	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)	Bukit Cheraka Estate	88,852.00	56,323.48	1.58	Bukit Kerayong Estate	65,756.00	44,393.91	1.48	Bukit Kerayong POM	1,338.00	73,196.52	0.10	
Estate / Mill	Fiber, MT	Shell, MT	Usage / FFB (MT)																								
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Bukit Kerayong POM	1,338.00	73,196.52	0.10																								
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	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none">• FFB record book• Stock book• Monthly stock issue• Stock requisition note Mill• Mill Month End Production Report	Complied																								

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		<ul style="list-style-type: none"> Monthly production report Flowmeter & running hours record book Bio-gas generation daily monitoring log sheet Effluent analysis report Based on the verification of records; all the sampled issuance was traceable <p>New planting in Bukit Cheraka Estate has been conducted in 2019, conversion area of 11.95 ha from nursery to Oil Palm within the certified area. SEIA dated 28/11/2018, LUCA and Carbon Stock Assessment has been conducted in 2018. The new planting has been conducted as per company policies and Standard Operating Procedures established.</p>	
7.10.2	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>New planting in Bukit Cheraka Estate has been conducted in 2019, conversion area of 11.95 ha from nursery to Oil Palm within the certified area. SEIA dated 28/11/2018, LUCA and Carbon Stock Assessment has been conducted in 2018. The new planting has been conducted as per company policies and Standard Operating Procedures established.</p> <p>As per Carbon Stock Assessment and Protection of Major GHG Emission for New Planting Development Report, SOU 7, Bukit Cheraka Estate dated August 2019, the total net GHG emission from the new planting is at 4 tCO₂e.</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. Among the plan for pollution preventive action Plan FY 2022/2023 were:</p>	Non-compliance

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		<ul style="list-style-type: none"> To ensure the preventive maintenance vehicles checklist were in place. Regularly inspection is carried out to these vehicles. To place tray underneath the vehicles. <p>Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p> <p>As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports (Isokinetic Stack & Air Emission Monitoring Report):</p> <p><u>Year 2023</u></p> <ul style="list-style-type: none"> Report no.: ALM/SDPB/0823/9004 Report date: 25/08/2023 Result: Dust: 45.60 mg/m³ (B5) vs limit 150, CO: 6.90 mg/m³ vs limit 1000 @ 12% CO₂ <p><u>1st Half 2023</u></p> <ul style="list-style-type: none"> Report no.: ALM/SDPB/0423/8478 Report date: 11/04/2023 Result: Dust: 25.70 mg/m³ (B5) vs limit 150, CO: 2.30 mg/m³ vs limit 1000 @ 12% CO₂ <p>For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring. Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored.</p> <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per</p>	
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		<p>"Jadual Pematuhan" no. AS(B)31/152/000/067 for DOE Licence No: 003124.</p> <p>Environmental audit by 3rd party has been conducted annually by BRAXTUS Sdn Bhd dated 27/06/2023.</p> <p>Latest DOE visit was sighted on 30/01/2024 with report reference number B0003669.</p> <p>The pollution prevention plan was not fully monitored and implemented</p> <p>During the site visit to the Workshop area of Bukit Kerayong Estate, it was discovered that one unit of Water Pump Engine Trailer was parked there without an oil tray. Additionally, in the Workshop Area of Bukit Cheraka Estate, one unit of Write-off Grabber Tractor also parked without an oil tray. Evidence of soil contamination from leakage was observed for both instances. These findings are inconsistent with the Pollution Prevention Plan 2023/2024, which addresses the issue of leakage or spillage of lubricant fluids from aged vehicles parked at the parking bay. The suggested mitigating measure is to place a tray underneath the vehicles. Thus, major NC was raised.</p>	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>In 2019, new planting occurred in Bukit Cheraka Estate, with an area of 11.95 hectares converted from a nursery to oil palm within the certified area. Environmental assessments, including SEIA dated November 28, 2018, LUCA, and Carbon Stock Assessment conducted in 2018, were completed. The new planting was carried out in accordance with company policies and established Standard Operating Procedures.</p>	Complied

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		Verification through document review, interviews, and site visits confirmed that there was no new planting or replanting prepared by burning. This is in line with the Zero Open Burning policy outlined in the SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. The management ensured compliance with Malaysian environmental laws, particularly the EQA and Regulations 1974. No instances of open burning were noted based on the records of land clearing and felling for replanting at the visited estates. Methods such as felling & chipping, cambering/land forming, and path construction were employed for land clearing and preparation.	
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Fire prevention measures have been implemented, as outlined in the Emergency Preparedness and Response Procedures document numbered UM/HSE/SP/02.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	There is documented evidence showing that management actively engaged with stakeholders regarding fire prevention and control measures, as discussed during the Stakeholder meeting dated 23/01/2024. Further details on fire prevention can be found in Section 4.3 and 10.0 of the relevant documentation. Additionally, new planting activities took place in Bukit Cheraka Estate in 2019, involving the conversion of 11.95 hectares from a nursery to oil palm within the certified area. Environmental assessments, including SEIA dated 28/11/2018, LUCA, and Carbon Stock Assessment conducted in 2018, were completed. The new planting adhered to company policies and Standard Operating Procedures.	Complied

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		Verification through document review, interviews, and site visits confirmed that there was no new planting or replanting prepared by burning, in accordance with the established procedures.	
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	<p>(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.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	In 2019, new planting took place at Bukit Cheraka Estate, involving converting 11.95 hectares from a nursery to oil palm within the certified area. Before this, environmental assessments were carried out: SEIA on November 28, 2018, LUCA on March 13, 2018, and a Carbon Stock Assessment in 2018. The new planting adhered to company policies and Standard Operating Procedures. A site visit confirmed that the conversion area didn't involve clearing primary forest or high conservation value (HCV) areas.	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>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.</p> <p>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 consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE:</p> <p>Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>According to the reports referenced, the HCV Re-Assessment for Selangor Central Zone: SOU 7 (Bukit Kerayong) by PSQM Department Sime Darby Plantation Sdn Bhd (Final Report Version II) dated December 2015, and the Addendum Report to HCV Re-Assessment for Selangor Central Zone: Strategic Operating Unit (SOU) 7 Bukit Kerayong, prepared by GSQM Department Sdn Bhd Sime Darby Plantation Berhad dated September 2019, the following details regarding HCV/Conservation value were provided:</p> <p><u>Estate: Bukit Cheraka</u></p> <ul style="list-style-type: none"> Area: Slope Area Size: 55.52 hectares HCV: 4 <p><u>Estate: Bukit Kerayong</u></p>	Complied

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		<ul style="list-style-type: none"> • Area: Pond • Size: 3.00 hectares • HCV: 4 <p>Additionally, new planting occurred in Bukit Cheraka Estate in 2019, involving the conversion of 11.95 hectares from a nursery to oil palm within the certified area. Environmental assessments were conducted, including SEIA on November 28, 2018, LUCA on March 13, 2018, and a Carbon Stock Assessment in 2018. The new planting was carried out following company policies and Standard Operating Procedures.</p> <p>A site visit confirmed that the conversion area of 11.95 hectares from nursery to oil palm did not involve clearing of primary forest or HCV areas. This is supported by information from the SEIA Report for SOU 7 Bukit Cheraka estate dated December 2018, specifically Section 3.6, which states that no HCV is located within a horizontal distance of 50 meters from the project site, including the slope area.</p> <p>HCV Awareness training has been conducted by Group Sustainability – Conservation and Biodiversity Unit on 20/02/2023 and internal training at 18/08/2023. Refer HCV Training and Otter Workshop for SOU 6 & SOU 7 at Community Hall Region Office CER Selangor. Base on interview with management and workers, they have good understanding on HCV matters.</p> <p>Other than that, there is a project collaboration between Sime Darby Plantation Berhad and Malaysian Nature Society dated 20/10/2022 until 17/02/2023 for Socioecological Survey in SOU4, SOU6 and SOU7 Estates for the Otter's Project Collaboration with MNS. Report was available for verification.</p>	
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7.12.3	<i>Indicator is not applicable in Malaysia context</i>	N/A	Not Applicable
7.12.4	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>A management plan focusing on High Conservation Value (HCV) and biodiversity has been put in place. The estates have prioritized education and awareness initiatives, with various methods outlined in the management plan:</p> <ul style="list-style-type: none"> • Conducting education and awareness programs to train the Strategic Operating Unit (SOU) on biodiversity, flora/fauna, and biodiversity management. • Utilizing communication channels such as the Sime Darby Plantation Berhad's webpage. • Creating fact sheets for internal and external distribution to increase awareness of nature conservation. • Encouraging further research on specific biodiversity. <p>Among the action plans outlined are:</p> <ul style="list-style-type: none"> • Installing signage indicating prohibitions such as No Fishing, No Hunting, No Swimming, and demarcating Buffer Zones. • Maintaining employee awareness about the significance of biodiversity to the planet. <p>In 2019, new planting activities took place in Bukit Cheraka Estate, involving the conversion of 11.95 hectares from a nursery to oil palm within the certified area. Environmental assessments including SEIA on November 28, 2018, LUCA on March 13, 2018, and a Carbon Stock Assessment in 2018 were conducted. The new planting adhered to company policies and Standard Operating Procedures.</p>	Complied

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		<p>A site visit confirmed that the conversion area of 11.95 hectares from nursery to oil palm did not entail clearing of primary forest or HCV areas. This is corroborated by information from the SEIA Report for SOU 7 Bukit Cheraka estate dated December 2018, specifically Section 3.6, which states that no HCV is located within a horizontal distance of 50 meters from the project site. Consequently, an HCV plan is deemed unnecessary for this area since it does not involve HCV areas.</p> <p>HCV Awareness training has been conducted by Group Sustainability – Conservation and Biodiversity Unit on 20/02/2023 and internal training at 18/08/2023. Refer HCV Training and Otter Workshop for SOU 6 & SOU 7 at Community Hall Region Office CER Selangor. Based on interview with management and workers, they have good understanding on HCV matters.</p>	
7.12.5	<p>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.</p> <p>- Minor compliance -</p>	<p>No High Conservation Value (HCV) areas overlapping with the existing rights of local communities were identified that required setting aside.</p>	Complied
7.12.6	<p>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 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.</p> <p>- Minor compliance -</p>	<p>According to the HCV Re-Assessment for Selangor Central Zone: SOU 7 (Bukit Kerayong) by the PSQM Department of Sime Darby Plantation Sdn Bhd (Final Report Version II) dated December 2015, and the Addendum Report to the HCV Re-Assessment for Selangor Central Zone: Strategic Operating Unit (SOU) 7 Bukit Kerayong, prepared by the GSQM Department of Sime Darby Plantation Berhad dated September 2019, it was noted that there were no Rights to Exclude (RTE) identified in the sampled estates.</p>	Complied

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		<p>HCV Awareness training has been conducted by Group Sustainability – Conservation and Biodiversity Unit on 20/02/2023 and internal training at 18/08/2023. Refer HCV Training and Otter Workshop for SOU 6 & SOU 7 at Community Hall Region Office CER Selangor. Based on interview with management and workers, they have good understanding on HCV matters.</p> <p>HCV Monitoring has been done. Sample record verified was HCV Monitoring Report dated 17/11/2023. Report has been verified by estates executive.</p>	
7.12.7	<p>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.</p> <p>- Minor compliance -</p>	<p>No (RTE) species were identified in the assessment conducted, as per the Addendum Report to the HCV Re-Assessment for Selangor Central Zone: Strategic Operating Unit (SOU) 7 Bukit Kerayong, Final Report Version III dated December 2015, by the Plantation Sustainability Quality Management (PSQM) Department, dated January 2020.</p>	Complied
7.12.8	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>In 2019, new planting took place at Bukit Cheraka Estate, with an area of 11.95 hectares converted from a nursery to oil palm within the certified area. Environmental assessments including SEIA conducted on November 28, 2018, LUCA conducted on March 13, 2018, and a Carbon Stock Assessment in 2018 were completed. The new planting adhered to company policies and Standard Operating Procedures.</p> <p>A site visit confirmed that the conversion area of 11.95 hectares from nursery to oil palm did not involve clearing of primary forest or High Conservation Value (HCV) areas. The area falls within the land title area and does not require Remediation and Compensation Procedure (RaCP).</p>	Complied

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **Bukit Kerayong POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2023** for **Bukit Kerayong POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.44
PKO	1.44

Extraction	%
OER	18.46
KER	4.71

Production	t/yr
FFB Process	64,499.09
CPO Produced	12,832.93
PKO Produced	3,275.39

Land Use	Ha
OP Planted Area	24,451.38
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	339.05
Total	24,790.43

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	26,816.76	0.55	797.35	0.50	0.00	0.00	27,614.12	0.55
CO ₂ Emission from fertilizer	3,520.37	0.07	92.81	0.06	0.00	0.00	3,613.18	0.07
NO ₂ Emission	1,905.67	48.77	48.77	0.00	0.00	0.00	1,954.44	48.77
Fuel Consumption	13.33	0.00	0.46	0.03	0.00	0.00	13.79	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-25,418.73	-0.52	-740.00	-0.04	0.00	0.00	-26,158.74	-0.52
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	6,837.40	0.14	199.39	0.01	0.00	0.00	9,557.53	0.14

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	13,623.00	0.20
Fuel Consumption	3.04	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	13,626.04	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

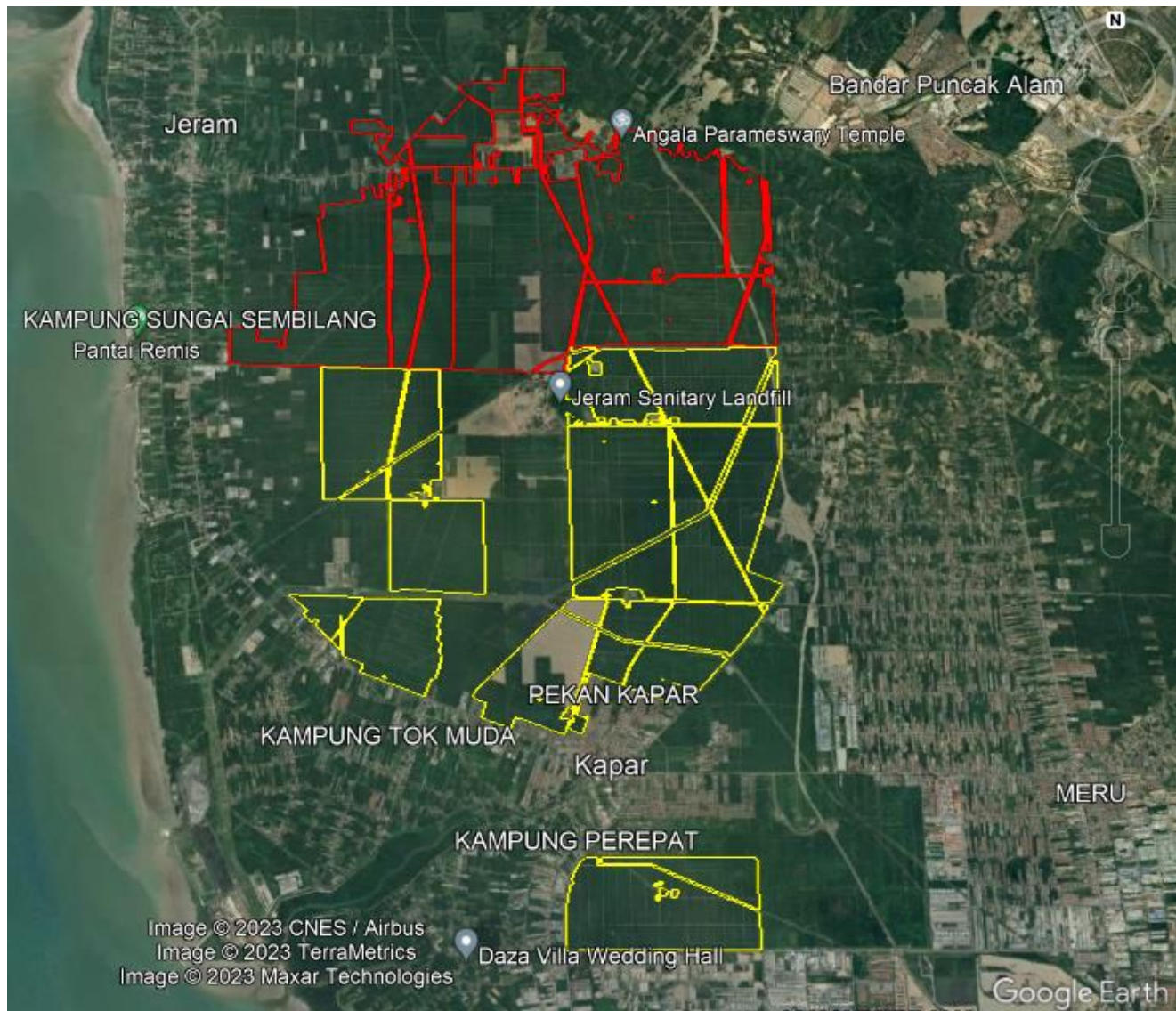
*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100

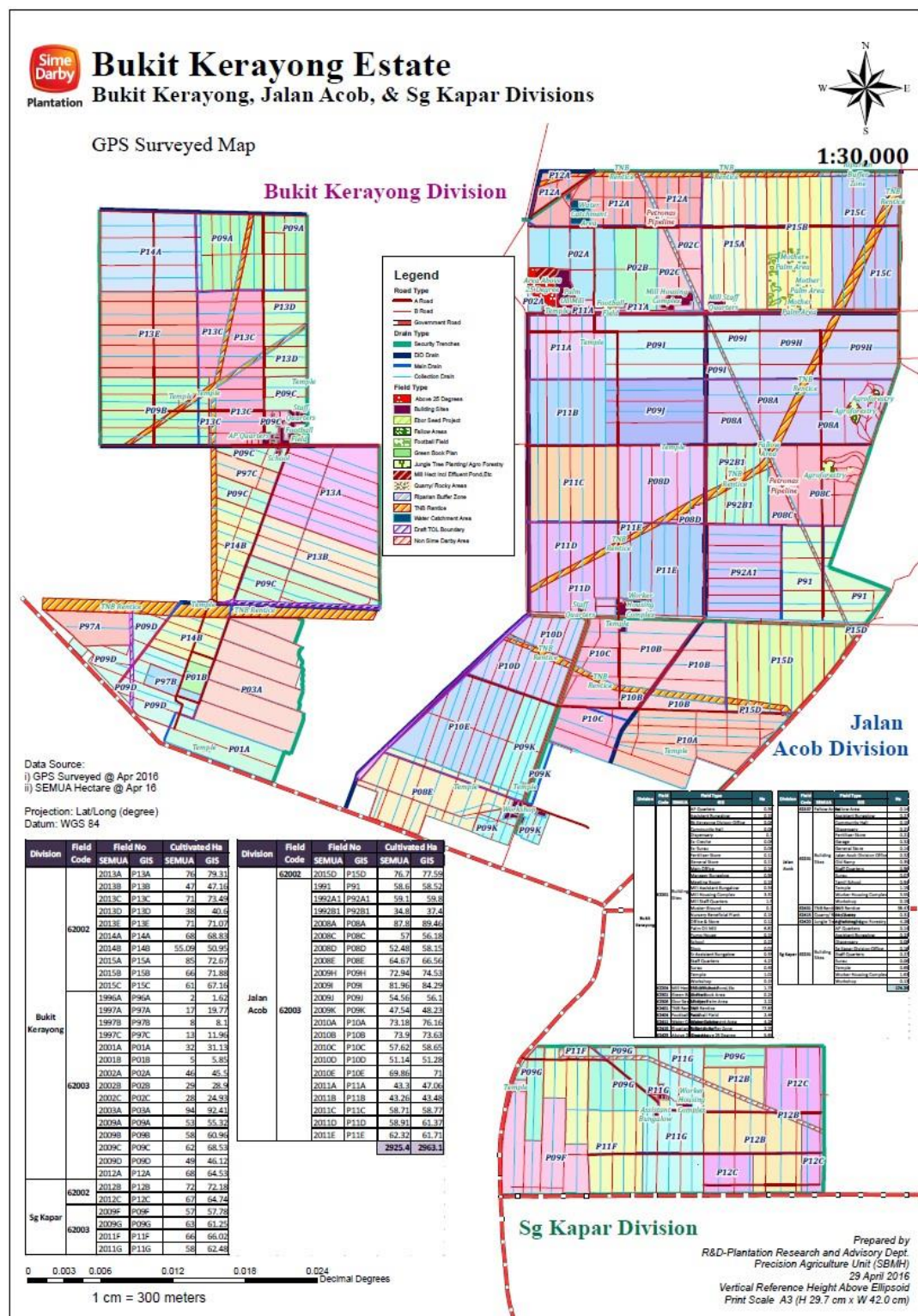
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

Note: The OP Planted was high due to crop receiving from SOU 8 Supply Bases and also from other uncertified small estates that send their FFB to Kerayong POM

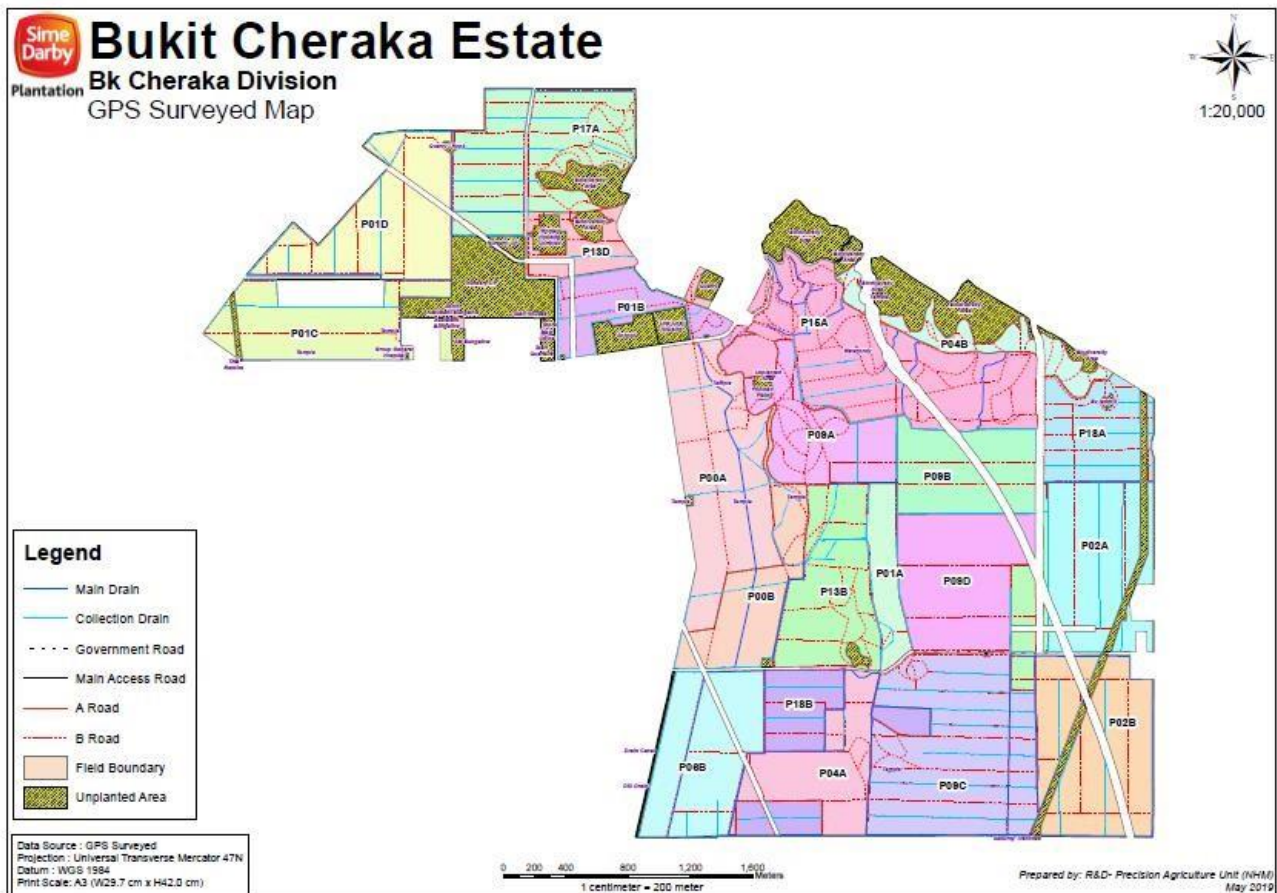
Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



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Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other: <i>Please specify</i>
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			
	N/A								
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