

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**☐ **Initial Assessment**☒ **Annual Surveillance Assessment (2_3)**☐ **Recertification Assessment** (Choose an item.)☐ **Extension of Scope**

Client Company Name / Parent Company: SD Guthrie Berhad
Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower, Oasis Ara Damansara, 50490 Kuala Lumpur, Malaysia
Certification Unit: Strategic Operating Unit (SOU 10) - Bukit Puteri Palm Oil Mill Location of Certification Unit: Bukit Puteri Palm Oil Mill, 27200 Kuala Lipis, Pahang, Malaysia
Date of Final Report: 02/07/2024

TABLE of CONTENTS
Page No

Section 1: Scope of the Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases	4
5. Description of Supply Base	4
6. Plantings & Cycle.....	4
7. Summary of Certified Tonnage of FFB (Own Certified Scope)	5
8. Summary of Certified Tonnage of FFB (from other certified unit(s))	5
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	5
10. Summary of Certified Tonnage (not applicable for ISS)	6
11. Summary of Actual Volume sold	7
12. Independent Smallholders Certified Tonnage / Volume	9
13. Independent Smallholders Actual Sold Tonnage / Volume	9
Section 2: Assessment Process	10
2.1 Assessment Methodology, Programme, Site Visits.....	10
2.2 BSI Assessment Team	12
2.3 Assessment Plan.....	13
Section 3: Assessment Findings	16
3.1 Multiple Management Units and Time Bound Plan.....	16
3.2 Progress of scheme smallholders and/or outgrowers.....	21
3.3 Details of Nonconformities	47
3.3.1 Status of Nonconformities Previously Identified and Observations.....	48
3.3.2 Summary of the Nonconformities and Status.....	54
3.4 Stakeholders and previous land owner / user consultation.....	55
3.5 Impartiality and conflict of interest	56
Formal Signing-off of Assessment Conclusion and Recommendation	57
Appendix A: Summary of Findings	58
Appendix B: GHG Reporting Executive Summary	151
Appendix C: Location Map of Certification Unit and Supply bases.....	153
Appendix D: Estate Field Map	154
Appendix E: List of Smallholder Registered and/or sampled	155
Appendix F: List of Abbreviations	156

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SD Guthrie Berhad (At the time of this assessment, known as 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, Oasis Ara Damansara, 50490 Kuala Lumpur, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 10) - Bukit Puteri Palm Oil Mill		
Location / Address	Bukit Puteri Palm Oil Mill, 27200, Kuala Lipis, Pahang, Malaysia		
Website	https://www.sdguthrie.com/		
Management Representative	Shylaja Devi Vasudevan Nair	E-mail	shylaja.vasudevan@sdguthrie.com
Telephone	+03-78484000	Facsimile	+03-78484363

2. Certification Information			
Certificate Number	RSPO 745403	Certificate Start Date	07/07/2021
Date of First Certification	07/07/2011	Certificate Expiry Date	06/07/2026
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	20 tonne/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 745405	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn. Bhd.	26/11/2027
MSPO 745404	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		26/11/2027
MSPO 745406	MSPO Supply Chain Certification Standard 2018		24/10/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Puteri Palm Oil Mill	Bukit Puteri Palm Oil Mill, 27200, Kuala Lipis, Pahang, Malaysia	4°12'07.50"N	101°51'46.10"E
Bukit Puteri Estate	Bukit Puteri Estate, 27200, Kuala Lipis, Pahang, Malaysia	4°11'41.20"N	101°53'22.80"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 Puteri Estate	3,660.82	21.36	160.33	3,842.51	95.27
Total	3,660.82	21.36	160.33	3,842.51	95.27

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bukit Puteri Estate	515.29	2,651.23	494.30	-	3,145.53	515.29
Total (ha)	515.29	2,651.23	494.30	-	3,145.53	515.29
Note: Only Mature area is considered as production area						

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 2023 - Jun 2024)	Actual (Apr 2023 – Mar 2024)		Forecast (Jul 2024 - Jun 2025)
		Previous license period (Apr 23 - Jun 23)	Current license period (Jul 2023 - Mar 2024)	
Bukit Puteri Estate	53,680.72	6,416.94	35,077.12	59,192.77
Total	53,680.72	41,494.06		59,192.77

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 2023 - Jun 2024)	Actual (Apr 2023 – Mar 2024)		Forecast (Jul 2024 - Jun 2025)
		Previous license period (Apr 23 - Jun 23)	Current license period (Jul 2023 - Mar 2024)	
Kerdau Estate (Certified under SOU 11 Kerdau)		42.65	20.81	
Mentakab Estate (Certified under SOU 11 Kerdau)		68.54	426.51	
Sg Mai Estate (Certified under SOU 11 Kerdau)		120.85	1,207.44	
Total		1,886.80		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 2023 - Jun 2024)	Actual (Apr 2023 – Mar 2024)		Forecast (Jul 2024 - Jun 2025)
		Previous license period (Apr 23 - Jun 23)	Current license period (Jul 2023 - Mar 2024)	
Supplier A		379.53	1,416.35	
Supplier B		4,348.20	15,944.78	
Supplier C		414.14	1,522.10	
Supplier D		798.02	1,875.93	
Supplier E		101.68	-	
Supplier F		811.71	1,408.95	

Supplier G		33.17	271.11	
Supplier H		12.70	156.11	
Total			29,494.48	

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	Apr-23	1,231.41	1,545.83	2,777.24
2	May-23	2,257.94	2,802.25	5,060.19
3	Jun-23	3,159.63	2,551.07	5,710.70
4	Jul-23	3,727.49	2,467.73	6,195.22
5	Aug-23	4,217.90	2,376.82	6,594.72
6	Sep-23	5,065.74	3,250.89	8,316.63
7	Oct-23	4,843.73	3,480.21	8,323.94
8	Nov-23	4,750.70	3,191.08	7,941.78
9	Dec-23	3,691.72	2,408.38	6,100.10
10	Jan-24	4,283.57	2,026.64	6,310.21
11	Feb-24	3,303.18	1,442.55	4,745.73
12	Mar-24	2,847.85	1,951.03	4,798.88
TOTAL		43,380.86	29,494.48	72,875.34

10. Summary of Certified Tonnage (MT) (not applicable for ISS)

Estimated last year (Jul 2023 - Jun 2024)	Actual (Apr 2023 – Mar 2024)		Forecast (Jul 2024 - Jun 2025)
	Previous license period (Apr 23 - Jun 23)	Current license period (Jul 2023 - Mar 2024)	
FFB	FFB		FFB
53,680.72 mt	6,648.98 mt	36,731.88 mt	59,192.77 mt
	TOTAL	43,380.86 mt	
CPO (OER: 20.50 %)	CPO (OER: 20.81, 20.75 %)		CPO (OER: 21.50 %)
11,004.55 mt	1,383.80 mt	7,621.36 mt	12,726.45 mt
	TOTAL	9,005.16 mt	
PK (KER: 4.30 %)	PK (KER: 4.27, 4.63 %)		PK (KER: 5.00 %)
2,308.27 mt	284.15 mt	1,702.48 mt	2,959.64 mt
	TOTAL	1,986.63 mt	

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Apr-23	255.27	60.59
2	May-23	471.01	93.70
3	Jun-23	657.52	129.86
4	Jul-23	767.12	128.60
5	Aug-23	877.32	188.12
6	Sep-23	1,055.19	241.13
7	Oct-23	1,027.36	234.92
8	Nov-23	1,006.67	232.78
9	Dec-23	769.35	177.57
10	Jan-24	852.00	200.04
11	Feb-24	681.12	163.18
12	Mar-24	585.23	136.13
TOTAL		9,005.16	1,986.63

11. Summary of Actual Volume sold					
Current License period (Jul 2023 - Mar 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	-	-	-	5,121.36	5,121.36
PK (MT)	974.33	-	-	728.06	1,702.39
Credits	2,500.00	-	-	-	2,500.00
Previous License period (Apr 2023 - Jun 2023)					
CPO (MT)	-	-	-	1,383.80	1,383.80
PK (MT)	-	-	-	284.24	284.24
Credits	-	-	-	-	-
Note: Conventional is RSPO certified material but sold as non-RSPO.					

RSPO P&C Public Summary Report**Revision 15 (Nov 2023)**

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	Non-disclosure	Non-disclosure	-	974.33
TOTAL			-	974.33

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)
1	Nil			
TOTAL				

11C. Records of CPO & PK Sold as conventional since the last audit (Apr 2023 - Mar 2024)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Non-disclosure	6,505.16	-
2	Non-disclosure	-	1,012.30
TOTAL		6,505.16	1,012.30

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (Apr 2023 - Mar 2024)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	Non-disclosure	Non-disclosure	1,500.00
2	Non-disclosure	Non-disclosure	1,000.00
TOTAL			2,500.00

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

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

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

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

Section 2: Assessment Process

Certification Body:

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

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **16/04/2024 – 19/04/2024**. 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 methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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

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.

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

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

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

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

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

Tentative Date of Next Visit: April 14, 2025 - April 17, 2025

Total Number of Mandays: 9.5 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Valence Shem (VSH)	Team Leader	<p>Education: Holds a Bachelor of Technology BTech (Hons.) Industrial Technology, University of Science Malaysia.</p> <p>Work Experience: He has more than 20 years of working experience with 9 years in oil palm plantation industry and 13 years in management system auditing since 2009 for various standards such as ISO 14001, RSPO P&C, RSPO SCCS, MSPO and SMETA.</p> <p>Training attended: He has completed ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Assessor Course, MSPO Awareness Training, ISO 45001 Lead Auditor Course, SMETA Auditor training, HCV-HCS training and RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Fahmi bin Othman (FBO)	Team Member	<p>Education: Bachelor's Degree in Industrial Biology from Universiti Teknologi Malaysia, graduated in 2010.</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an Assistant Manager with FGV Plantation (M) Sdn Bhd managing the day-to-day plantation operations before joining FGV Holdings Berhad as Sustainability Officer for another significant numbers of years. In his career at FGV, Fahmi had accumulated more than 7 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans</p> <p>Training attended: He has completed CQI – IRCA approved ISO 9001, and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course as well as SA 8000.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Zulkifli bin Kamarol Zaman (ZKZ)	Team Member	<p>Education: He graduated in Bachelor of Science (Agribusiness) from University Putra Malaysia (UPM) in 2008.</p> <p>Work Experience: He has 10 years' experience in oil palm industry whereas he has been working at plantation company as Estate Assistant Manager prior</p>

RSPO P&C Public Summary Report**Revision 15 (Nov 2023)**

		<p>to joining Certification Body as an Auditor. He is familiar with the estate's daily operation as well as the Best Management Practices for oil palm cultivation. Prior to joining BSI, he was the auditor for several certification bodies. He is involved in auditing MSPO OPMC, MSPO SCCS, RSPO P&C, RSPO SCCS and PEFC CoC standard.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001 Lead Auditor Course in April 2018, Endorsed MSPO OPMC Lead Auditor Course in April 2019, Endorsed MSPO SCCS Auditor Course in September 2019, Endorsed RSPO P&C Lead Auditor Course in March 2020, Endorsed RSPO SCCS Lead Auditor Course in March 2020, PEFC Chain of Custody Training in December 2020, ISO 9001:2015 Lead Auditor Course in October 2023, ISO 45001:2018 Lead Auditor Course in November 2023 and SA8000 Introduction & Basic Auditor Training Course in November 2023.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input 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>
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Accompanying Persons:

Name	Role
Mohd Razaleigh bin Mohamad (MRM)	Observer

2.3 Assessment Plan

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

Date	Time	Subjects	VSH	FBO	ZKZ	MRM
Monday 16/04/2024	0900-0930	Opening meeting (combined with MSPO): • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation)	✓	✓	✓	✓
	0930-1300	Bukit Puteri Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. and documentation review.	✓	✓	✓	✓
	1300-1400	Lunch break				
	1400-1630	Bukit Puteri Estate Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓	✓
Tuesday 17/04/2024	0900-1300	Bukit Puteri Estate Continue with outstanding elements.	✓	✓	✓	✓
	1300-1400	Lunch break				
	1400-1630	Bukit Puteri POM Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓	✓
Wednesday 18/04/2024	0900-1300	Bukit Puteri POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓	✓	✓
	1000-1300	Stakeholder consultation Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-	-
	1300-1400	Lunch break				
	1400-1600	Bukit Puteri POM Continue with outstanding elements.	✓	✓	✓	✓
	1600-1630	Interim closing briefing	✓	✓	✓	✓

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Date	Time	Subjects	VSH	FBO	ZKZ	MRM
	1630-1700	Audit team discussion & preparation for closing meeting	✓	✓	✓	✓
Thursday 19/04/2024	0900-1200	Bukit Puteri POM RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	-	-	-
	1200-1300	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?	SD Guthrie 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, SD Guthrie 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): https://sime-darby-plantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SD Guthrie Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As of Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently SD Guthrie Berhad 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 July 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 7) 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	Complied

	that these units are still awaiting to receive land titles. Refer TBP approval dated 13/07/2023.	
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 SD Guthrie 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: SD Guthrie 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 . For Liberia operations: As at 16/01/2020, SD Guthrie 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 . 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 that these units are still awaiting to receive land titles. Refer TBP approval dated 13/07/2023.	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	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

HCVs and HCS in accordance with RSPO P&C criterion 7.12.	awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/2023. There was no replacement of primary forest as verified in the below summary reports and the company's internal audit.	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within SD Guthrie 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 https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/ 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/ 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/ 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/ 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/ 	Complied

	<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 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>	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>SD Guthrie 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 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, no labor dispute issues were 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>SD Guthrie Berhad have published Grievance mechanism that is applied to all management units. Disputes related</p>	Complied

	to labor, stakeholders and communities are to be dealt using this mechanism.	
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	SD Guthrie Berhad 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.	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.	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 are mainly awaiting 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 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.	Complied
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.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

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					

RSPO P&C Public Summary Report **Revision 15 (Nov 2023)**

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								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
	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					

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

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
	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					
	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	13-Jul-23

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

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								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
										Estate / Karang Ringin Estate is still in process.	
	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					
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					

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

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
	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					

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

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
	Indonesia	Bebunga Estate	3,958.43	Certified	Not Applicable	16-Mar-12					
	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					
Sekunyir	Indonesia	Sekunyir Mill	7,734.59	Certified	Not Applicable	23-Nov-10					
	Indonesia	Sekunyir Estate	3,555.19	Certified	Not Applicable	23-Nov-10					
	Indonesia	Seruyan Estate	4,179.40	Certified	Not Applicable	23-Nov-10					
Sukamandang	Indonesia	Sukamandang Mill	14,779.92	Certified	Not Applicable	5-Jul-11					
	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					

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

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
Pemantang	Indonesia	Pemantang Mill	16,601.66	Certified	Not Applicable	5-Jul-11					
	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					
Lembiru	Indonesia	Lembiru Mill	9,409.07	Certified	Not Applicable	3-Jul-14					
	Indonesia	Lembiru Estate	4,929.49	Certified	Not Applicable	3-Jul-14					
	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 &	13-Jul-23

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

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
										Beturus Estate is still in process	
	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 (West and East Estate) is still in process.	13-Jul-23
Sg. Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	Not Applicable	12-Aug-10					

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

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
	Malaysia	Anak Kulim Estate	1,523.35	Certified	Not Applicable	12-Aug-10					
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	Not Applicable	12-Aug-10					
	Malaysia	Somme Estate	941.56	Certified	Not Applicable	12-Aug-10					
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	Not Applicable	12-Aug-10					
	Malaysia	Padang Buluh Estate	4,008.47	Certified	Not Applicable	12-Aug-10					
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	Not Applicable	12-Aug-10					
	Malaysia	Jentayu Estate	2,178.59	Certified	Not Applicable	12-Aug-10					
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	Not Applicable	5-Oct-11					
	Malaysia	Chersonese Estate	3,293.72	Certified	Not Applicable	5-Oct-11					
	Malaysia	Kalumpang Estate	2,716.80	Certified	Not Applicable	5-Oct-11					
	Malaysia	Tali Ayer Estate	3,756.10	Certified	Not Applicable	5-Oct-11					
	Malaysia	Holyrood Estate	1,332.74	Certified	Not Applicable	5-Oct-11					
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	Not Applicable	18-Jun-11					
	Malaysia	Kamuning Estate	3,888.43	Certified	Not Applicable	18-Jun-11					
	Malaysia	Elphil Estate	1,865.43	Certified	Not Applicable	18-Jun-11					
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	Not Applicable	18-Jun-11					

RSPO P&C Public Summary Report **Revision 15 (Nov 2023)**

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
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	Not Applicable	5-Oct-11					
	Malaysia	Flemington Estate	1,906.84	Certified	Not Applicable	5-Oct-11					
	Malaysia	Bagan Datoh Estate	3,781.86	Certified	Not Applicable	5-Oct-11					
	Malaysia	Sabak Bernam Estate	2,511.79	Certified	Not Applicable	5-Oct-11					
	Malaysia	Sg. Samak Estate	3,025.74	Certified	Not Applicable	5-Oct-11					
Seri Intan/Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	Not Applicable	3-Mar-11					
	Malaysia	Selaba Oil Mill	1,549.75	Certified	Not Applicable	3-Mar-11					
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sabrang Estate	3,945.23	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sogomana Estate	2,214.08	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sg. Wangi Estate	2,226.66	Certified	Not Applicable	3-Mar-11					
	Malaysia	Bikam Estate	2,075.16	Certified	Not Applicable	3-Mar-11					
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	Not Applicable	3-Mar-11					
Tennamaram	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	Not Applicable	3-Mar-11					
	Malaysia	Tennamaram Estate	1,981.60	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	Not Applicable	3-Mar-11					

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

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)			
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	Malaysia	Bukit Talang Estate	3,572.44	Certified	Not Applicable	3-Mar-11					
Bukit Kerayong	Malaysia	Bukit Benut Oil Mill	6,346.90	Certified	Not Applicable	15-Apr-11					
	Malaysia	Bukit Benut Estate	2,699.28	Certified	Not Applicable	15-Apr-11					
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	Not Applicable	15-Apr-11					
East	Malaysia	East Oil Mill	10,902.94	Certified	Not Applicable	19-May-10					
	Malaysia	East Estate	5,634.45	Certified	Not Applicable	19-May-10					
	Malaysia	Sepang Estate	2,092.28	Certified	Not Applicable	19-May-10					
	Malaysia	Dusun Durian Estate	3,176.21	Certified	Not Applicable	19-May-10					
West	Malaysia	West Oil Mill	5,912.69	Certified	Not Applicable	19-May-10					
	Malaysia	West Estate	5,912.69	Certified	Not Applicable	19-May-10					
Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	Not Applicable	7-Jul-11					
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	Not Applicable	7-Jul-11					
Kerdau	Malaysia	Kerdau Oil Mill	13,781.50	Certified	Not Applicable	7-Jul-11					
	Malaysia	Kerdau Estate	5,683.04	Certified	Not Applicable	7-Jul-11					
	Malaysia	Mentakab Estate	3,266.49	Certified	Not Applicable	7-Jul-11					
	Malaysia	Chenor Estate	2,834.98	Certified	Not Applicable	7-Jul-11					

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

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
	Malaysia	Sg Mai Estate	1,996.99	Certified	Not Applicable	7-Jul-11					
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	Not Applicable	7-Jul-11					
	Malaysia	Jabor Estate	2,332.92	Certified	Not Applicable	7-Jul-11					
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	Not Applicable	30-Dec-11					
	Malaysia	Labu Estate	4,529.72	Certified	Not Applicable	30-Dec-11					
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	Not Applicable	19-May-10					
	Malaysia	Tanah Merah Estate	4,341.73	Certified	Not Applicable	19-May-10					
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	Not Applicable	19-May-10					
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sua Betong Estate	2,870.75	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sengkang Estate	2,831.51	Certified	Not Applicable	18-Feb-14					
	Malaysia	Bradwall Estate	3,828.34	Certified	Not Applicable	18-Feb-14					
	Malaysia	PD Lukut Estate	1,523.79	Certified	Not Applicable	18-Feb-14					
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sg. Bahru Estate	1,427.31	Certified	Not Applicable	18-Feb-14					
	Malaysia	Salak Estate	3,868.86	Certified	Not Applicable	18-Feb-14					

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

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)			
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Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	Not Applicable	7-Jul-11					
	Malaysia	Muar River Estate	1,584.62	Certified	Not Applicable	7-Jul-11					
	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	Not Applicable	7-Jul-11					
	Malaysia	Kok Foh Estate	2,275.84	Certified	Not Applicable	7-Jul-11					
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	Not Applicable	7-Jul-11					
	Malaysia	St. Helier Estate	1,992.65	Certified	Not Applicable	7-Jul-11					
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	Not Applicable	7-Jul-11					
	Malaysia	Pertang Estate	1,052.49	Certified	Not Applicable	7-Jul-11					
Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	Not Applicable	20-May-10					
	Malaysia	Kempas Estate	4,505.45	Certified	Not Applicable	20-May-10					
	Malaysia	Tangkah Estate	2,537.78	Certified	Not Applicable	20-May-10					
	Malaysia	Kemuning Estate	2,671.05	Certified	Not Applicable	20-May-10					
	Malaysia	Serkam Estate	2,114.23	Certified	Not Applicable	20-May-10					
Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	Not Applicable	5-Oct-11					
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	Not Applicable	5-Oct-11					

RSPO P&C Public Summary Report **Revision 15 (Nov 2023)**

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
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	Not Applicable	5-Oct-11					
	Malaysia	Welch Estate	1,447.82	Certified	Not Applicable	5-Oct-11					
Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	Not Applicable	28-Jan-14					
	Malaysia	Pagoh Estate	2,325.93	Certified	Not Applicable	28-Jan-14					
	Malaysia	Lanadron Estate	1,964.44	Certified	Not Applicable	28-Jan-14					
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	Not Applicable	28-Jan-14					
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	Not Applicable	18-Nov-10					
	Malaysia	Chaah Estate	2,795.36	Certified	Not Applicable	18-Nov-10					
	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	Not Applicable	18-Nov-10					
	Malaysia	North Labis Estate	3,532.91	Certified	Not Applicable	18-Nov-10					
Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	Not Applicable	19-May-10					
	Malaysia	Gunung Mas Estate	3,466.17	Certified	Not Applicable	19-May-10					
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	Not Applicable	19-May-10					
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	Not Applicable	19-May-10					
	Malaysia	Yong Peng Estate	2,975.41	Certified	Not Applicable	19-May-10					
Bukit Benut	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	Not Applicable	5-Oct-11					

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

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
	Malaysia	Bukit Benut Estate	2,799.78	Certified	Not Applicable	5-Oct-11					
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	Not Applicable	5-Oct-11					
	Malaysia	CEP Nyior Estate	1,955.19	Certified	Not Applicable	5-Oct-11					
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	Not Applicable	11-Apr-11					
	Malaysia	Ulu Remis Estate	2,598.25	Certified	Not Applicable	11-Apr-11					
	Malaysia	Cenas Estate	1,974.06	Certified	Not Applicable	11-Apr-11					
	Malaysia	Bukit Badak Estate	3,234.25	Certified	Not Applicable	11-Apr-11					
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	Not Applicable	11-Apr-11					
	Malaysia	Pekan Estate	3,258.70	Certified	Not Applicable	11-Apr-11					
	Malaysia	Sembrong Estate	1,778.88	Certified	Not Applicable	11-Apr-11					
Bukit Kerayong	Malaysia	Bukit Kerayong Oil Mill	11,371.82	Certified	Not Applicable	29-Mar-11					
	Malaysia	Sri Pulau Estate	2,049.87	Certified	Not Applicable	29-Mar-11					
	Malaysia	Kulai Estate	3,023.42	Certified	Not Applicable	29-Mar-11					
	Malaysia	Layang Estate	3,258.90	Certified	Not Applicable	29-Mar-11					
	Malaysia	CEP Renggam Estate	3,039.63	Certified	Not Applicable	29-Mar-11					
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	Not Applicable	1-Oct-08					

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

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)			
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	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tunku Estate	3,199.05	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tigowis Estate	2,074.02	Certified	Not Applicable	1-Oct-08					
	Malaysia	Sentosa Estate	3,545.54	Certified	Not Applicable	1-Oct-08					
	Malaysia	Segaliud Estate	4,820.13	Certified	Not Applicable	1-Oct-08					
Melalap	Malaysia	Melalap Oil Mill	5246.18	Certified	Not Applicable	21-Jan-11					
	Malaysia	Melalap Estate	2,096.73	Certified	Not Applicable	21-Jan-11					
	Malaysia	Sapong Estate	3,149.45	Certified	Not Applicable	21-Jan-11					
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	Not Applicable	16-Jan-09					
	Malaysia	Binuang Estate	3,271.08	Certified	Not Applicable	16-Jan-09					
	Malaysia	Sungang Estate	3,407.98	Certified	Not Applicable	16-Jan-09					
	Malaysia	Tingayu Estate	1,881.08	Certified	Not Applicable	16-Jan-09					
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	Not Applicable	16-Jan-09					
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	Not Applicable	16-Jan-09					
	Malaysia	Giram Estate	4,166.98	Certified	Not Applicable	16-Jan-09					
	Malaysia	Mostyn Estate	4,178.04	Certified	Not Applicable	16-Jan-09					

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

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

RSPO P&C Public Summary Report **Revision 15 (Nov 2023)**

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)			
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	Malaysia	Paroh Estate	2,627.90	Certified	Not Applicable	30-Dec-11					
Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	Not Applicable	30-Dec-11					
	Malaysia	Rajawali Estate	6,087.27	Certified	Not Applicable	30-Dec-11					
	Malaysia	Samudera Estate	3,308.60	Certified	Not Applicable	30-Dec-11					
	Malaysia	Semarak Estate	2,248.68	Certified	Not Applicable	30-Dec-11					
	Malaysia	Bayu Estate	2,459.90	Certified	Not Applicable	30-Dec-11					
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	Not Applicable	30-Dec-11					
	Malaysia	Derawan Estate	2,490.79	Certified	Not Applicable	30-Dec-11					
	Malaysia	Sahua Estate	2,644.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Takau Estate	2,107.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Damai Estate	2,287.04	Certified	Not Applicable	30-Dec-11					
Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Tetere Estate	2,947.79	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	Not Applicable	18-Mar-11					

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

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)			
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	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	Not Applicable	18-Mar-11					
Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	Not Applicable	15-Feb-13					
	PNG	Giligili Estate	1,095.47	Certified	Not Applicable	15-Feb-13					
	PNG	Hagita Estate	2,450.02	Certified	Not Applicable	15-Feb-13					
	PNG	Waigani Estate	2,341.13	Certified	Not Applicable	15-Feb-13					
	PNG	Sagarai Estate	2,864.55	Certified	Not Applicable	15-Feb-13					
	PNG	Padipadi Estate	4,517.67	Certified	Not Applicable	15-Feb-13					
	PNG	Mariawatte Estate	1,680.14	Certified	Not Applicable	15-Feb-13					

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

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

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

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

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

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
	PNG	Embi Estate	1,737.78	Certified	Not Applicable	1-Feb-13					
	PNG	Ambogo Estate	2,040.00	Certified	Not Applicable	1-Feb-13					
	PNG	Sangara Estate	1,780.00	Certified	Not Applicable	1-Feb-13					
	PNG	Sumbiripa Estate	2,545.00	Certified	Not Applicable	1-Feb-13					
	PNG	Mamba Estate	4,013.10	Certified	Not Applicable	1-Feb-13					
	PNG	Sambugo Estate	2,637.85	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	Not Applicable	1-Feb-13					
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Kumbango Oil Mill		Certified	Not Applicable	10-Sep-08					

RSPO P&C Public Summary Report **Revision 15 (Nov 2023)**

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
	PNG	Kapiura Mill			Certified	Not Applicable	10-Sep-08					
	PNG	Numundo Mill			Certified	Not Applicable	10-Sep-08					
	PNG	Waraston Mill			Certified	Not Applicable	10-Sep-08					
	PNG	Bebere Estate		2,226.71	Certified	Not Applicable	10-Sep-08					
	PNG	Kumbango Estate		2,610.80	Certified	Not Applicable	10-Sep-08					
	PNG	Togulo Estate		1,509.20	Certified	Not Applicable	10-Sep-08					
	PNG	Dami Estate		1,507.00	Certified	Not Applicable	10-Sep-08					
	PNG	Waisisi Estate		1,090.00	Certified	Not Applicable	10-Sep-08					
	PNG	Kautu Estate		4,280.60	Certified	Not Applicable	10-Sep-08					
	PNG	Karaisu Estate		2,387.64	Certified	Not Applicable	10-Sep-08					
	PNG	Moroa Estate		848.16	Certified	Not Applicable	10-Sep-08					
	PNG	Bilomi Estate		2,011.70	Certified	Not Applicable	10-Sep-08					
	PNG	Loata Estate		562.00	Certified	Not Applicable	10-Sep-08					
	PNG	Haella Estate		4,220.30	Certified	Not Applicable	10-Sep-08					
	PNG	Garu Estate		3,709.60	Certified	Not Applicable	10-Sep-08					
	PNG	Daliavu Estate		2,484.10	Certified	Not Applicable	10-Sep-08					

RSPO P&C Public Summary Report **Revision 15 (Nov 2023)**

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

RSPO P&C Public Summary Report **Revision 15 (Nov 2023)**

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

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

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 zero (0) Critical; zero (0) Minor nonconformities and two (2) Opportunity For Improvement raised.

Below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	N/A	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Opportunity for Improvements	
OFI #	Description
OFI 1	2474058-202404-I1 <u>Indicator 2.1.3</u> Based on site visit at the boundary between Bukit Puteri Estate, Filed No. P09A and Fxxx Sxxx Kxxx 2, the boundary trench was seen to be not visibly maintained. It was observed that the trench has been covered by overgrown vegetations (woodies and oil palms). The estate has a budget and plan to maintain the boundary this year. The plan is expected to be executed soon. An OFI is raised to ensure follow up is made in the next assessment visit.
OFI 2	2474058-202404-I2 <u>Indicator 7.8.1</u> The campaign of "water saving" can be further improved. Currently, based on the past 3 months records (Jan-Mar 2024), the water consumptions for domestic use were observed to be like more than 500 lt/person/day.

Positive Findings	
PF #	Description
PF 1	Good cooperation from the management team in the assessment activity.

PF 2	Retrieval of relevant documents was efficient.
PF 3	High interest was shown by the sampled workforce in implementing the RSPO Standard requirements.

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2331174-202304-M1	Issued Date	06/04/2023
Due Date	05/07/2023	Closure Date	31/05/2023
Indicator & Category (Critical / Minor)	3.8.12 – Critical		
Statement of Nonconformity:	The mill has delivered mass Balance sales from a negative stock.		
Requirement Reference:	Record Keeping i) For Mass Balance Module, the mill: 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) 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.		
Objective Evidence:	Noncompliance on the implementation of Supply Chain Records and Transactions were verified as below. Based on the verification of the Mill's PK Production and PK Sales registered in RSPO PalmTrace for the period under review (Apr 2022 to Mar 2023), it was found that the mill has sold PK from a negative stock for 6 consecutive months, Aug 2022 – Dec 2022. As of to date (Mar 2023), the mass balance record still recorded negative balance. (- 176.01 mt)		
Corrections:	Mill management to liaise with GSD and Global Trading team to ensure accurate mass balance accounting and consistency of the remaining balance at the mill and Global Trading for selling purpose.		
Root Cause Analysis:	Inaccurate mass balance accounting for the mill and lack of monitoring mechanism together to avoid overselling of CSPK together with Global Trading team.		
Corrective Actions:	1) GSD team will provide an in-house training on 2 & 3 May 2023 regarding RSPO Supply Chain Certification and mill will send executive-in-charge of SCCS to attend the training with training evaluation. 2) Mill Management & Global Trading team to establish frequent communication on the mass balance accounting/ balance of certified volume on monthly basis.		
Assessment Conclusion:	Major NC Close Out 1) In house training with training evaluation has been conducted on 2-3/05/2023. Refer RSPO MSPO Supply Chain Certification in House Training by Group Sustainability. Training given by Pn Aminah Ang. Sighted evidence of mill representative, Mr. Muhammad Izzat Farhan. 2) Frequent communication between mill management and Global Trading team has been conducted via email on monthly basis. Refer correspondence email between mill and Global Trading dated 23/05/2023 and 10/02/2023. Month record template on CPO and PK produced has been established and sent to		

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

	<p>Global Trading before 7th every month.</p> <p>3) Verification on PK record found last despatch was on Dec 2022 and until date of the audit, there is no PK despatch due to mill have to positive back their stock. Refer latest Mass Balance record dated May 2023.</p> <p>4) Interview with Mill 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 31/05/2023. Continuous implementation will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Based on verification of the mill's Mass Balance account for the period under review (Apr 2023 to Mar 2024), there were no negative stock of certified CPO nor PK. The sales of certified product were always made from positive stock. The person in-charge of the accounting was also able to explain clearly about the mass balance calculation. Since there was no recurrence of non-conformity, thus this Critical NC remains closed.</p>

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2331174-202304-M2	Issued Date	06/04/2023
Due Date	05/07/2023	Closure Date	31/05/2023
Indicator & Category (Critical / Minor)	6.7.3 – Critical		
Statement of Nonconformity:	Appropriate PPE and Sanitation Facility was not used.		
Requirement Reference:	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>1) During the site visit to the spraying operation at Bukit Puteri Estate, it was verified that the sprayers did not wear appropriate PPE (Safety Goggles) while in operation. This was not in accordance with the HIRARC – Spraying dated 15/01/2022 of Bukit Puteri Estate.</p> <p>2) Interview with the sprayers indicated that they do not sanitise themselves prior to returning home from spraying activities. They acknowledged that they only use the facility to wash the PPEs and return home to sanitise themselves.</p>		
Corrections:	<p>1) The Estate immediately supplies anti fogged goggle to all sprayers and ensure they are being worn during spraying. Briefing is to be done to mandore to make sure that all sprayers wear full PPEs during spraying.</p> <p>2) To conduct awareness briefing to sprayers in order to explain the importance to sanitize themselves before going back home and appoint mandore to record whether workers have sanitized themselves after spraying before returning home and report immediately to estate management if otherwise.</p>		
Root Cause Analysis:	<p>1) Lack of monitoring by mandore/ estate management of appropriate PPE usage by sprayers during the spraying operation. PPE checklist is available, however is ineffective as mandore/staff/assistant did not fully utilize it. Further checking with sprayers that the google provided by Estate management will fog when</p>		

	<p>worn during operation.</p> <p>2) Lack of monitoring by Estate management to ensure that the facility is used and no mechanism to ensure that the SOP is adhered to. Estate management has spoken to sprayers and the sprayers claimed that they are more comfortable showering at home rather than at the facility provided, and no monitoring is implemented.</p>
Corrective Actions:	<p>1) Staff to do spot check on the compliance on PPE usage and mandore to ensure that PPE checklist is fulfilled on daily basis (Spraying Operation) during muster call.</p> <p>2) To conduct refresher training on the importance of PPE usage during chemical handling with training evaluation.</p> <p>3) To appoint staff-in-charge to monitor the overall records of showering facility usage periodically.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <p>1) Checking on PPE by staff has been conducted. Refer latest record BPE PPE Checklist dated 29/05/2023, 25/05/2023, 24/05/2023, 23/05/2023 and 20/05/2023 as per spraying operation. Refer Muster chit on checking the spraying activity.</p> <p>2) Refresher training with training evaluation has been conducted. Refer Refresher Training to Sprayers dated 05/04/2023 and 09/05/2023 and Briefing Regarding the Importance Of Emergency Washroom And Training On How To Use dated 05/04/2023 and 09/05/2023. Training evaluation has been done. Refer Training Need Analysis dated 09/05/2023.</p> <p>3) Appointment letter to staff in charge sighted to Mr Zaini Bin Ramli dated 02/05/2023 with reference "Surat Perlantikan Staff Bertanggungjawab Pematuhan Mandi Selepas Kerja Racun". Interview with person in charge found have good understanding on their task responsibilities.</p> <p>4) Inspection on Sprayers PPE at Bukit Puteri estate found all PPE was wearing accordingly. PPE used was Safety goggles, Respirator, Apron, Wellington boots, and nitrile gloves. Interview with sprayers found they have good awareness on using shower facility before back to their house. Checking on shower facility found all equipped and function accordingly.</p> <p>5) Site visit at estate found all correction and corrective action has been implemented.</p> <p>6) Interview to sample workers and person in charge found the awareness on it was in order.</p> <p>Based on the above evidence, the major Non-Conformity is closed effectively on 31/05/2023. Continuous implementation will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Verification has been made during this assessment through interview, observations and documentation review where found the following evidence in objective to ensure the continuous effectiveness of corrective actions:</p> <p>1) Training records entitled Refresher Training Safety Work Procedure and PPE Training to Workers that was conducted on 06/02/2024, attended by the sprayers. The training covered topics of PPE usage, type of chemical, working tools, spraying technique and what do and don't before, during and after spraying activities.</p> <p>2) Shower Room Usage Book was made available during the audit for review and verification. The purpose is to ensure the workers do not bring their PPE to home, wash themselves after spraying activities and keep the personal clothes</p>

	<p>in their locker as per SOP. This was monitored by Senior Assistant Manager on a daily basis.</p> <p>3) PPE inspections are conducted during muster call is conducted using Daily PPE Checklist to ensure that workers go to workplace with appropriate PPE.</p> <p>4) During site visit at spraying activities area, it was observed that workers wore appropriate PPE as per recommended in the HIRARC and CHRA report. Interview with the sprayers found they are able to demonstrate their understanding on what to do before, during and after spraying activities, as well as their responsibilities related to the safety as sprayers.</p> <p>5) Site visit at shower room and their personal locker found that clean clothes are kept in respective locker for sprayers.</p> <p>Based on the above objective evidence found that no recurrence of issues observed, and continuous implementation of corrective action is adequate. Therefore, the previous Critical NC remains closed.</p>
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Previous Audit Minor Non-conformity			
NCR Ref #	2331174-202304-N1	Issued Date	06/04/2023
Due Date	20/06/2023	Closure Date	19/04/2024
Indicator & Category (Critical / Minor)	3.3.2 - Minor		
Statement of Nonconformity:	Mechanism to check consistent implementation of procedures were not effectively demonstrated.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>Bukit Puteri Estate</p> <p>Site visit carried out at house# E25 (division B), damage complaint recorded in OPP against actual condition for main and room doorknob broken and bathroom water tub/container leaking were verified. Risk category rated as "low" however based on Appendix C; Recommended timeline for repair completion it should be rated as high for the main door broken and water tank leakage issue.</p> <p>For house# A8, in the OPP tracker/summary, damage complaint made on 24/1/23 for broken ceiling, electrical plug point and no water supply for kitchen sink. Repair work completed on 18/2/23 and updated in OPP tracker/summary. Based on interview with house# A8 owner has confirmed that repair work has yet to be completed. Status reported in OPP tracker/summary was found to be inconsistent with the actual status as to date.</p> <p>Bukit Puteri POM</p> <p>During site at house# J101, it was found that outlet pipe blocked due to modification of new V-drain and causing stagnant water at the parameter drain. Based on latest (housing complex/nest/community hall weekly inspections (PIOA) dated 25/3/23, this was not reflected in the inspection sheet.</p> <p>Reference:</p> <p>i) Workers Housing Management Procedure version 1, dated 30/6/2022, Appendix C; Recommended timeline for repair completion</p> <p>ii) 'OilPalmPal' Digital Housing Complaint System (OPP DHCS).</p>		

Corrections:	<p>Bukit Puteri Estate</p> <p>Estate Management to update remark in the OPP for house# E25 (division B) repair on the categorization of risk category. The handyman was instructed to repair immediately, and repairs were completed on 5th April 2023 and additionally to update the OPP system on the work completion.</p> <p>Bukit Puteri POM</p> <p>Mill management has found of the cause of the stagnant water and will repair the drain for all houses and connect back to the new V-drain. Mill management has already tendered out to repair the drain on 20 March 2023 and closing date for tendering is on 11 April 2023. Mill will proceed for tender evaluation and get top management approval before appoint vendor to do the repair work. Mill estimate by end July 2023 the repair work will finish.</p>
Root Cause Analysis:	<p>Bukit Puteri Estate</p> <p>During inspection the water leakage in bathroom container where the storage of water still available in overhead water tank and the door can be lock using door lock from inside. For the above reason the inspection was rated as low based on inspector justification on site. Estate overlooked to put comments in remark column in the OPP system to record the real conditions to explain why the case is rated as low. Miscommunication where handyman reported that the repair was completed to Estate Management. There is multiple complaint in one report. Part of the work were completed where some of the complaint is still pending for repair. Closure of report is made with communication with handyman alone rather than confirming with the occupants on work completion.</p> <p>Bukit Puteri POM</p> <p>Ineffective housing inspection by Assistant Manager (Person-in-charge of Accommodation) resulting in the issue is unable to be detected beforehand. Estate Management modified the V-drain in early 2023 to construct new drainage at their housing, effecting Mill workers' drainage system. Ineffective complaint mechanism as workers did not report the issue in either Social Dialogue or OPP. All issues that have been raised as non-conformities has been identified due to lack of competencies of the PIC and ineffectiveness of the training.</p>
Corrective Actions:	<p>Bukit Puteri Estate</p> <ol style="list-style-type: none"> 1) Estate management representative has to follow the procedures and to report more precisely on the risk category and work completion in the remark column in the OPP system. 2) To brief workers to report separately for each breakdown in on OPP system and to brief house owners to follow up with divisional executive if the repair pending more than a week. 3) The house owner to sign and verify work done once work completed. <p>Bukit Puteri POM</p> <ol style="list-style-type: none"> 1) Mill management to communicate with workers' representative (WR) during Social Dialogue to strengthen reporting of housing related issues to the management. 2) Mill management to improve housing inspection quality by attaching picture periodically as evidence of housing compound condition. <p>To fully utilized the training evaluation form which will be fill up by the participant and approved by the trainer.</p>

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Assessment Conclusion:	The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.
Effectiveness Closure (for previous Minor NC):	<p>Bukit Puteri Estate</p> <p>Verification has been made on OPP report summary for January, February and March 2024. Risk category for each report was clearly separated into low, medium and high as per Appendix C; Recommended timeline for repair completion in Workers Housing Management Procedure version 1, dated 30/6/2022. There is also signature of complainant for each work completed verification. Site verification at J101, where the report of a broken lamp bulb was reported on 2/4/2024, confirmed that the replacement was carried out as scheduled.</p> <p>Bukit Puteri POM</p> <p>Social dialogue has been utilized as medium of highlighting the importance of conducting the real situation of housing inspection report. Reviewed latest social dialogue meeting conducted on 26/3/2024.</p> <p>It was verified that line-site inspection report includes pictures of any unfavourable conditions, providing a visual record to guide further actions by the mill management. Latest line-site inspection reviewed was on 13/4/2024.</p> <p>The evidence of correction and corrective action implementation was found to be effective. Thus, this Minor NC is closed.</p>

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

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2020.01	Major	6.2.2	19/09/2020	Closed on 02/10/2020
2045335-202104-M1	Major	7.8.2	16/04/2021	Closed on 15/07/2021
2045335-202104-M2	Major	7.10.3	16/04/2021	Closed on 15/07/2021
2045335-202104-M3	Major	3.6.1	16/04/2021	Closed on 15/07/2021
2045335-202104-M4	Major	6.7.3	16/04/2021	Closed on 15/07/2021
2045335-202104-M5	Major	6.2.3	16/04/2021	Closed on 15/07/2021
2045335-202104-N1	Minor	2.1.3	16/04/2021	Closed on 04/04/2022
2045335-202104-N2	Minor	7.12.7	16/04/2021	Closed on 04/04/2022
2045335-202104-N3	Minor	7.11.3	16/04/2021	Closed on 04/04/2022
2045335-202104-N4	Minor	2.2.2	16/04/2021	Closed on 04/04/2022
2186018-202204-M1	Major	2.1.1	08/04/2022	Closed on 05/07/2022
2186018-202204-N1	Minor	3.3.3	08/04/2022	Closed on 06/04/2023
2331174-202304-M1	Major	3.8.12	06/04/2023	Closed on 31/05/2023
2331174-202304-M2	Major	6.7.3	06/04/2023	Closed on 31/05/2023
2331174-202304-N1	Minor	3.3.2	06/04/2023	Closed on 19/04/2024

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 Strategic Operating Unit (SOU) 10 - Bukit Puteri Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal	Gender Committee Representative	Face to face
Union	NUPW Representative	Face to face
Internal	Local Workers	Face to face
Internal	Foreign Workers	Face to face
Government Agencies	Representative of Sek Keb Sxx Kxxx and Sek Keb KXX KXXX, Ketua Balai Polis PXX TXX, JPKK Kg KXX, LKPP RTP Sg. UXXX	Face to face
Contractor	XX Enterprise, YY Enterprise	Face to face
Local Communities	JPKK Kg Keledok, LKPP RTP Sg. Ular	Face to face

Stakeholders comment	
1	<p>Feedbacks: Local Community; JPKK Kg KXXX</p> <p>The estate and mill management teams demonstrated excellent cooperation, offering not only financial support but also providing manpower and machinery when assistance is needed. The relationship and contributions to the local community from the estate management are consistent. SD Guthrie Berhad estates are known for offering employment opportunities to local villagers. There have been no reports of land encroachment by SD Guthrie Berhad estates.</p> <p>Audit Team verification and response: No further issue.</p>
2	<p>Feedbacks: Contractors; XX Ent & YY Enterprise</p> <p>All jobs and contracts offered by the estate and mill management were official and documented through contract agreements, purchase orders, or work orders. Payments were made promptly according to the terms specified in the contract agreement. All contracts were signed by both parties—the estate</p>

	management and the contractor. In addition, all contractors attended RSPO/MSPO, safety and all related trainings and briefings conducted by the estate management.
	Audit Team verification and response: No further issue.
3	<p>Feedbacks: Internal; Local & Foreign workers</p> <p>Trainings related to company's Standard Operating Procedures (SOPs), policies, safety and health practices, and environmental and social aspects were regularly conducted and provided to the workers. Employment contracts and payslips are provided to workers, with their salaries deposited directly into their bank accounts. Wages are paid in accordance with the Minimum Wages Order 2022. Personal Protective Equipment (PPE) is supplied at no cost to the workers, and replacements can be requested from the estate and mill management. Foreign workers retain possession of their passports, and workers are informed about the complaint and grievance channels available to them particularly on 'Suara Kami' and OPP platform.</p>
	Audit Team verification and response: No further issue.
4	<p>Feedbacks: Gender Committee Representative</p> <p>Female workers reported that no cases of sexual harassment or violence have been reported since the last audit. Female workers understand the role of the Gender Committee and are aware of the complaint mechanism to address any issues. They indicated that they are treated equally, without discrimination, by the estate and mill management.</p>
	Audit Team verification and response: No further issue.
5	<p>Feedbacks: Government Agencies; Sek Keb Fxx Sg Kxxx, Sek Keb Kg Kxx & Balai Polis Pxxx Txxx</p> <p>As per interviewed, it has been confirmed that good relationships have between estate and mill towards government school and police department. All three representative has been often invited for annual stakeholder consultations. They also mentioned that they were aware about procedure and policy that has been established. There are no issues related to safety of the students and has been highlighted by school representative.</p>
	Audit Team verification and response: No further issue.

List of landowner / 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 estate already underwent two cycles of replanting.					

Previous landowner / user comment

N/A	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.

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Strategic Operating Unit (SOU) 10 - Bukit Puteri Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Strategic Operating Unit (SOU) 10 - Bukit Puteri Palm Oil Mill is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Valence Shem	Name: Shylaja Devi Vasudevan Nair
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: SD Guthrie Bhd
Title: Lead Auditor	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: 09/05/2024	Date: 20/06/2024

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

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 -	SD Guthrie Berhad persistently utilized the their website for distributing various public information management documents, , Occupational Health and Safety (OHS) plans, Environmental Impact Assessment (EIA) and Social Impact Assessment (SIA) reports, documentation on High Conservation Value (HCV), plans for pollution prevention and reduction, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies, and plans for continual improvement. Each operational unit maintains its own set of documents and records to showcase adherence to these guidelines.	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Based on review at the website, https://www.sdguthrie.com/ and interview with the management, it was noted that information such as Sustainability policies were prominently displayed in different locations, including the main notice boards of the estates/mill and muster ground notice boards, allowing both employees and visitors to review them. Onsite interviews with selected internal and external stakeholders affirmed that the information provided was in suitable languages and easily accessible to them.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	No information requests have been received for any of the operating units, and this has been confirmed through records and interviews with stakeholders. Only requests for assistance have been recorded. According to the interviews conducted, any information requests will be documented in the logbook.	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and	The communication of the policy has been documented in the Standard Operating Manual (SOM), specifically in subsection 5.5 on management	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	responsibility, and in the appendix 5.5.3.2 which outlines the Procedure for external communication. The policy dissemination occurred during stakeholder consultations held on 05/03/2024, where various stakeholders from all operating units attended the session.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Both the estate and the mill consistently updated their records of stakeholders' information, which has details such as addresses, contact numbers, and nominated representatives. These stakeholders ranged from contractors, vendors/suppliers, foreign recruitment agencies, embassies, and government agencies to schools, local communities, and CPO/PK customers. Based on document review, list of stakeholders last updated in January 2024.	Complied
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 -	SD Guthrie Berhad has established an ethical conduct policy, which is documented in the document titled Code of Business Conduct Policy. This policy has been endorsed by Mohamad Helmy Othman Basha, the Group Managing Director. The policy emphasizes the company's commitment to upholding five core values in all business transactions: integrity, respect & responsibility, enterprise, and excellence. Additionally, the latest Group Sustainability & Quality Policy Statement includes a clause on promoting good governance and transparency. It underscores the importance of adhering to the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC), which were signed by the Group Managing Director on 02/12/2019.	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 -	SD Guthrie Berhad has implemented a Code of Business Conduct, embodying principles of fairness, integrity, and ethics throughout its business processes. The company strictly prohibits any involvement in bribery within its business	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		<p>operations. This code is available in both Bahasa Malaysia and English languages.</p> <p>Additionally, implementation of the Vendor Integrity Pledge and Vendor Code of Business Conduct (COBC) also been conducted as part of its due diligence process for external parties engaged by Operating Units. Sighted samples as below:</p> <ol style="list-style-type: none"> 1. NOXX AZXXX BXX KAXXXXX – EFB Transport Contractor 2. MAXX BEXXXXX ENXXXXXXXX – FFB Transport Contractor 	
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	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Among the evidence of compliance verified were:</p> <p><u>Bukit Puteri POM:</u></p> <ul style="list-style-type: none"> - DOE License #004160, valid until 30/06/2024 - Certificate of Fitness (Boiler) #PH PMD 66, valid until 01/08/2024 - Certificate of Fitness (air receiver) #PH PMT 3639, valid until 01/08/2024 - Certificate of Fitness (water softener) #PH PMT 3077, valid until 01/08/2024 - Certificate of Fitness (receiver tank) #PH PMT 2290, valid until 01/08/2024 - Water resource consumption certificate, #0122, valid until 31/12/2024 - BOMBA fire certificate, #336176, valid until 19/10/2024 - MPOB License, #536632004000, valid until 28/02/2025, approved to process 120,000 mt FFB/year 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Private installation from Energy Commission, #2023/02378, valid until 19/09/2024 <p><u>Bukit Puteri Estate:</u></p> <ul style="list-style-type: none"> - MPOB License, #5224186002000, valid until 31/10/2024 - MPOB License for nursery, #533567011000, valid until 31/10/2024 - Permit to store diesel, #P: C003092, valid until 25/05/2025 - CF air compressor, #PMT110331, valid until 09/04/2025 - CF air compressor, #PH PMT 81559, valid until 10/07/2024 - SW competent person (including the mill), #CePSWaM/2321515, valid until 15/06/2024 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Addressed in Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 20. The Group Sustainability Department (GSD) and the respective operating units will undertake the responsibility of identifying, managing, updating, and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>Tracking system is available to identify changes in the relevant regulations through head office, website information and the information is communicated from the Group Head Office.</p> <p>The sampled OUs have their list of all relevant laws and legal requirements documented in Legal and Other Requirement Register (LORR). The lists are reviewed from time to time and updated whenever necessary.</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	Based on site visit at the boundary between Bukit Puteri Estate, Filed No. P09A and Fxxx Sxxx Kxxx 2, the boundary trench was seen to be not visibly maintained. It was observed that the trench has been covered by overgrown vegetations (woodies and oil palms). The estate has a budget and plan to maintain the boundary this year. The plan is expected to be executed soon. An OFI is raised to ensure follow up is made in the next assessment visit. There was no oil palm planted beyond the legal boundaries observed.	OFI
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	Both mill and estate maintained a list of contracted parties in their respective List of Stakeholders Information for the fiscal year 2024. This list includes stakeholders such as Local Community Heads, Neighbours, Local Authorities, and Vendors (Contractors & Suppliers).	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	Based on sample of agreement contracts and Vendor Integrity Pledge records for selected contractor, sighted that there are specific clauses ensuring compliance with applicable legal requirements, as documented in the for sampled contractors, as outlined below: Bukit Puteri Estate 1. NOXX AZXXX BXX KAXXXXX – EFB Transport Contractor 2. MAXX BEXXXXX ENXXXXXXXX – FFB Transport Contractor Bukit Puteri POM 1. AXX ELXXXXXXXX & PLXXXX ENXXXXXXXX – Grass Cutting Services 2. NAXXXXX INXXXXXXXX (M) SDX BHX – CPO Transporter	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		Review of all agreements indicated requirements for contractor to commit with following responsibilities and compliance measures: Clause 5 - Labour & Human Rights Clause 6 - Environment Occupational Safety Health Clause 7 - Ethic & Management Practices	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. - Minor compliance -	The contract documents and Vendor Integrity Pledge (VIP) records reviewed in indicator 2.2.2 also include clauses prohibiting child labor, forced labor, and trafficked labor. Furthermore, contractors and vendors do not employ young workers based on interview session and review of workers/drivers database provided.	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires: <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 - Critical (Major) compliance -	Bukit Puteri POM has one own supply bases under SOU 10 namely Bukit Puteri Estate. The mill also receives FFB from other estates outside SOU 10 which is under SD Guthrie Berhad (i.e., Kerdu Estate, Mentakab Estate and Sg. Mai Estate). All estates under SD Guthrie Berhad possessed complete information as verified during the audit as following: <ul style="list-style-type: none"> Information of GPS. Evidence of the ownership status as per land title. Delivery notes as supporting documents for claim. Valid MPOB license with purpose 'Menjual dan Mengalih FFB' 	Complied
2.3.2	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. - Minor compliance -	A new announcement has been made on the RSPO website regarding updates for the interim measure for the fulfilment of indicator 2.3.2 of the 2018 RSPO Principles & Criteria whereby mentioned "In reference to the Announcement made on 14 February 2022, the Standard Standing Committee (SSC) has endorsed the extension of the interim measure for the fulfilment of Indicator 2.3.2 of the 2018 P&C until the revised Principles and Criteria (P&C) is adopted by RSPO Members at the General Assembly in the year 2024. This indicator	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator	Assessment Findings	Compliance
	<p>relates to the data collection required to demonstrate the legality and locality of all indirect FFB suppliers to the mill. The extension of the interim measure is only applicable to cases that have been registered within the deadline stipulated in the previous announcement. New registrations of cases after the deadline will not be accepted." The announcement can be access through the link below:</p> <p>Updates: Interim Measure for the Fulfilment of Indicator 2.3.2 of the 2018 RSPO Principles and Criteria - Indirect FFB Suppliers - Roundtable on Sustainable Palm Oil (RSPO)</p> <p>Previously, following the 1st RSPO Announcement dated 14 February 2022 in Interim Measure for Fulfilment of Indicator 2.3.2, SD Guthrie Berhad has submitted the indicator 2.3.2 Case Register to RSPO Secretariat as evident in email communication dated 11/11/2022. Acknowledgement from RSPO Secretariat was received on 24/11/2022. Sime Darby aimed to fulfil the requirement of this indicator by November 2023.</p> <p>Reflecting to the above, SD Guthrie Berhad has taken steps in objective to comply with 2.3.1 and 2.3.2 of this requirement by developed Standard Operating Procedures (SOP) entitled Responsible Sourcing Guideline for FFB Traceability (Doc. No.: SD/SDP/GS/001, date: June 2020). This SOP is a guideline to trace and record the indirect FFB supplier. As mentioned in section 3.1 and 3.3 of the SOP, the mandatory requirements to be followed by third party FFB suppliers are:</p> <ul style="list-style-type: none"> i) Valid MPOB license ii) Oil palm farm is legally owned to demonstrate legal entitlement to the hand ownership. Evidence may include grant/land title. iii) Geolocation of the third party FFB suppliers <p>Several indirectly sourced FFB for Bukit Puteri POM were recorded in the Trace to Plantation (TTP) Masterlist system and file. Information on locations with</p>	

Criterion / Indicator		Assessment Findings	Compliance
		<p>GPS coordinate, MPOB license no., MPOB license validity and land title no. were kept in the system. In the system and file also recorded the palm oil local scheme certificate i.e.: Malaysian Sustainable Palm Oil (MSPO) such as MSPO certificate no. and validity of certificate for each FFB supplier. The list was updated on 07/01/2024 by Supply Chain Executive from HQ. The executive gathers information on indirectly sourced FFB from all POM under SD Guthrie Berhad and proceed to input this data into the TTP system and file. The supporting documents for FFB despatch to Bukit Puteri POM were demonstrated by the delivery note from indirect FFB supplier, for example:</p> <ul style="list-style-type: none"> - Txx Xhxxx Xxox; No.: 0257 - XX Xxxx XXXXXXX; Delivery Order No.: 49897 - XXXXXXX Xaxxx Sdn Bhd; D/N No.: 27898 - Xxix Xxxx XXXXXXXXX; No.: 06932 - Xxaxxxx Xxx Xxxx Xlxxxxxx; No.: AOP 00979 	
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>	The business or management plans for the estates and mill were presented in the form of annual budget (MPLAN) with 4 years projection (2025 – 2028). The annual budget contains the crop projection and the finance allocation for field & mill operation and administrations. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.	Complied
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	The estates have prepared the replanting programme with minimum of 5 years projection. The review of the programme is done at the end of every year. Below are the details of the programme:	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings					Compliance
		Estate	Ha				
			2024	2025	2026	2027	2028
		Bukit Puteri	163.24	212.67	181.70	99.93	0
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	Management review meeting for the operating units were last conducted on 25/03/2024 (Bukit Puteri POM), and 04/04/2024 (Bukit Puteri Estate). The meetings were chaired by the respective managers of the operating units and attended by the key personnel. Based on the minutes of meeting for both estate and mill, among the agenda discussed were: <ul style="list-style-type: none">• Matters arising from previous meeting• Changes in regulations, standards, policies & procedures in relation to sustainability management system• Review on operation performance & product conformity• Review on management plans• Results from system audits & assessments• Stakeholder feedback and complaints• Resources for system implementation• Continual improvement plan• Conclusion/meeting outputs					Complied
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.							
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	The estate and mill have established social and environmental improvement plans outlined in the Social Impact Assessment Plan and Environmental Management Plan. Action plans were formulated in response to identified areas					Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	- Critical (Major) compliance -	<p>and issues of concern raised. Social continuous improvement plan was developed according to the following:</p> <p>Bukit Puteri Estate</p> <ol style="list-style-type: none"> 1. To regularly engage with relevant stakeholders such as workers, surrounding communities, government agencies, suppliers, contractors as method to get their feedbacks and response. 2. To install car porch at local workers quarters with approval amount up to RM67,000.00. 3. To increase water tank capacity for residential area with amount approved RM448,600.00 4. To repair worker quarters and providing and replacing furniture with budgeted amount of RM46,050.00. <p>Bukit Puteri POM</p> <ol style="list-style-type: none"> 1. Workers Housing - Improvement of Workers living Condition - continuous repairing job for mill quarters. 2. To increase lighting facilities at housing porches and main road to housing area 	
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>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP)</p>	<p>The Certification Unit has filled their RSPO metrics template version 2.1. Based on verification through various documents such as land titles, JKPP report, employees register, computer software recording system, to name a few, the data reported in the metrics template were found to be accurate.</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required. - Minor Compliance -		
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -	<p>The operations were guided by various SOPs mentioned below which were made available for verification:</p> <p><u>Mill</u></p> <ol style="list-style-type: none"> 1) Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. 2) Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) to includes mill SOPs. Sighted SOP for fruit handling station, sterilization station, threshing station, pressing station, kernel recovery station, boiler station and effluent treatment plant. <p><u>Estate</u></p> <p>Sime Darby's Agricultural Reference Manual that covers the entire operation of the estates from land preparation to crop harvesting and evacuation.</p>	Complied
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	Apart from daily routine supervision, among the other mechanism to check consistent implementation of the procedures are visit by the agronomist, internal audit, site inspection by the SHO, ESH visit, Estate Structured Crop Recovery, Structured Estate Performance Assessment Unit (SEPA) and Structured Oil Recovery Assessment (SORA) visits to name a few.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>The sampled operating units maintain all records of monitoring and available for review. Among the records verified but not limited to were:</p> <ul style="list-style-type: none"> - Various checklists used by the estates and mill for operations 	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Health and safety monitoring - Line site Inspections (Weekly) - Work Site Inspections (Quarterly) - Crop Quality Assessment by SQM (6 Monthly) - Plantation Management Unit (Yearly) - Internal Audit (Yearly) - Environment, Safety & Health Visit (As and When Required) - Structured Oil Recovery Assessment (SORA) – (6 Monthly) 	
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	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	<p>There is no new planting in the sampled estate. Nonetheless, the assessment of environmental impact of its existing activities is documented in the following documents:</p> <ul style="list-style-type: none"> • Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register • Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI • Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE <p>The Social Impact Assessment (SIA) was conducted and documented in a report titled "Social Impact Assessment (SIA) Report" for SOU 10 which consists of Bukit Puteri Estate and Bukit Puteri Palm Oil Mill back on 17-18/09/2015. The assessment was carried out by the GSD (formerly known as PSQM) department. It was sighted that there is addendum of the assessment conducted on 15/02/2024 due to replanting activities that started in February</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		2024. Information collection and assessment were conducted through observation, site visit, documents review and interviews with stakeholders such as workers, contractors, government agencies, and local communities.	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The environmental management plans were developed based on the results of the environment impact assessment in various forms such as pollution prevention plan, waste management plan, GHG reduction plan, and water management plan to name a few.</p> <p>The SIA management plan was available and updated for year 2024. Both estate and mill have identified the negative and positive impacts during assessment. These impacts have been available in the plan as per verification. The implementation was verified at sampled estate as following:</p> <ul style="list-style-type: none"> - To attend to workers' complaints regarding housing in a timely manner, as documented in the Oil Palm Pal (OPP) system. This system is used to record the status and details of complaints made by workers concerning housing matters. - To engage with relevant stakeholders to gather feedback on estate operations through various channels, including Union meetings, Gender Committee Meetings, Social Dialogue meetings, and Stakeholder meetings. - To consistently communicate policies, Standard Operating Procedures (SOPs), and estate information during stakeholder meetings. - To promote membership of National Union Plantation Workers (NUPW) to all workers especially to new recruited workers. <p>It was confirmed that there are series of meeting session has been conducted by estate and mill to update their implementation of mitigation and monitoring</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance															
		<p>plan to their internal and external stakeholders based on identified impacts in their SEIA. The sessions are tabulate as below:</p> <table><tr><td>Session</td><td>Estate</td><td>Mill</td></tr><tr><td>External Stakeholder Meeting</td><td colspan="2">05/03/2024</td></tr><tr><td>Social Dialogue</td><td>26/03/2024</td><td>21/03/2024</td></tr><tr><td>Gender Committee Meeting</td><td>26/03/2024</td><td>21/02/2024</td></tr><tr><td>Workers Union Meeting</td><td>26/01/2024</td><td>12/02/2024</td></tr></table> <p>Further confirmation was obtained through an interview session conducted by the auditor, along with an internal and stakeholder meeting. Affected stakeholders, including nearby villagers, contractors, and internal workers, claimed that they were regularly updated on the estate and mill's monitoring plans through a series of meetings as outlined in the table above.</p>	Session	Estate	Mill	External Stakeholder Meeting	05/03/2024		Social Dialogue	26/03/2024	21/03/2024	Gender Committee Meeting	26/03/2024	21/02/2024	Workers Union Meeting	26/01/2024	12/02/2024	
Session	Estate	Mill																
External Stakeholder Meeting	05/03/2024																	
Social Dialogue	26/03/2024	21/03/2024																
Gender Committee Meeting	26/03/2024	21/02/2024																
Workers Union Meeting	26/01/2024	12/02/2024																
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>Verification through field visits, review of monitoring records, and interview with the relevant persons in-charge and stakeholders showed that the environmental management plans were satisfactorily implemented, reviewed and regularly updated in a participatory way.</p> <p>It was also noted that social management plan is reviewed yearly, usually at the beginning of the year with inputs obtained from the management, workers representatives and stakeholders. Among session conducted to collect inputs and updating progress of implementation are:</p> <p>1. Stakeholder meeting – once a year, last conducted on 05/03/2024</p>	Complied															

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		2. Gender Committee meeting – every 3 months, last conducted 16/02/2024 3. Union Meeting – once a year, last conducted on 26/01/2024 4. Monthly monitoring of documents by contractor's details and related documents such as payslips, employment contract and works permits 5. Social dialogue meeting with workers representative – once a month, last conducted on 26/03/2024	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	Guideline for Hiring of Local Workers procedure (Doc. No.: 01-12-19), dated 01/12/2019, and the Migrant Worker Responsible Recruitment Procedure dated 20/08/2021 were referred for the respective processes of recruiting local and migrant workers. Recruitment of foreign workers will be conducted by the headquarters through appointed agents in their respective countries and Malaysia to manage documentation process along the recruitment procedure. While for local workers, it normally started with identification of vacant positions within the operating units. Interested individuals can submit their applications, which will be screened and shortlisted by the management. During the interview process, the assistant manager will provide a briefing on the job roles, tasks, and expectations. The final list of successful applicants will be approved by the manager before proceeding with the medical evaluation.	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Sampled of 14 workers were selected for verification with 4 of them were latest recruited in August 2023. These workers represent diverse origins, genders, and races. The verification process based on documents review confirmed that the recruitment procedures were implemented correctly, and all records were maintained appropriately. Job application form, records for interview, medical check-up records, confirmation letter and offer letter were observed in employment details file	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		for local workers. While for foreign workers, records verified are medical check-up (FOMEMA), agreement in understandable language, employment extension letter, certificate of induction training, and memo for amendment of any related regulation.	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Policy for Occupational Health and Safety has been documented in the Health, Safety and Environment (HSE) Policy Statement dated 01/06/2020 and signed by Chief Executive Officer Upstream Malaysia.</p> <p>In the policy stated the company commitment to the well-being of its employee, providing safe and healthy working environment, pre-emptively preventing our employees and external parties in the operations from injury and ill health as well as operating in an environmentally responsible manner at global operating sites.</p> <p>Policy also stated the commitment to comply with statutory requirements, inculcating the culture of safety and health, improving the management of occupational safety, health related and environmental matters eliminating or minimizing any potential adverse effect on the environment arising from or business activities and to educate and encourage stakeholders in maintaining and enhancing the quality of the health, safety, and environment.</p> <p>Reflecting to the above policy, all operations were risk assessed to identify all health and safety issues by estates and mill under SOU 10 Bukit Puteri POM. Mitigation plans and procedures were available, documented and implemented.</p> <p>Risk assessment for HIRARC is guided by procedure entitled UM HSE Management System; OSH Risk Management Procedure; Doc Number: HSE/SP/01; Dated: 2021. Appropriate risk control measures were determined and implemented for the respective activities and operation at all visited estates</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator	Assessment Findings	Compliance
	<p>and mill. HIRARC will revise once accident happen to the activities in the estates and mill.</p> <p>Risk assessed carried out are as below:</p> <p>Bukit Puteri Estate</p> <ol style="list-style-type: none"> 1. HIRARC was established in the estate to assess all risks and hazards associated to all operations in the estate using latest format OSH Risk Assessment Register. There was risk identified as significant and control measures determined to mitigate the risks. <p>Observed during site visit to harvesting, circle spraying and manuring operation including FFB evacuation found that the workers were worn PPE as per HIRARC recommendation. Latest revised HIRARC document was on 17/01/2024 for harvesting operation.</p> <ol style="list-style-type: none"> 2. Chemical Health Risk Assessment (CHRA) has been conducted on 10/06/2020. Report of the CHRA is provided for verification during the audit (report no.: HQ/14/ASS/00/00001-2020/13). The assessment has been conducted by competent person with DOSH registration no.: HQ/14/ASS/00/358. Based on CHRA report, the assessment conducted at the work unit of mixing operator, sprayer operator, nursery operator, pest and disease operator, storekeeper, schedule waste operator, manuring operator, and workshop operator. All CHRA action plan was summarized in document entitled CHRA Action Plan which prepared by Site Safety Sustainability Officer (SSSO) SOU 10 and tabulated issue/recommendation and action taken from the CHRA report. <p>All workers were exposed to the chemical hazards consists of pesticides sprayer, fogging, manuring operator and workshop operator have undergone medical surveillance programme as recommended in CHRA report. Medical surveillance was conducted by stages following workers</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>job on 21/06/2023, 22/06/2023, 27/06/2023, 03/07/2023,11/07/2023 and 27/02/2024 (for new sprayers) by Occupational Health Doctor (OHD) with DOSH registration no.: HQ/08/DOC/00/281. The result medical surveillance has been acknowledged by the workers as verified during interview with sampled workers during field visit. All workers undergo medical surveillance is fit to continue their work without any abnormal results caused by occupational. In addition, site visit at chemical store, fertilizer store and chemical premix area found that the workers understand and able to demonstrate the used of appropriate PPE for conducting the work related to chemical as recommended in the CHRA report. Apart of medical surveillance, which is conducted yearly, monthly clinical checks are also carried out by the Medical Assistant to the workers exposed to the chemical hazards. Monthly health checking records (done at the clinics) were available and satisfactorily maintained. Health check includes eye, ear, nose, mouth, pulse, blood pressure and skin.</p> <p>3. Noise Risk Assessment (NRA) was conducted on 24/09/2021 by competent person with DOSH registration no.: HQ/09/PEB/00/97. From the report, it was found that the activity assessed in the assessment were heavy machinery including tractor, mechanical cutter, grasscutter, workshop operation and blower. This is found in compliance to the Occupational Safety and Health (Noise Exposure) Regulations 2019.</p> <p>Site verification at field and store found that recommendation from the assessment were implemented such as fixing hearing protection sticker, wearing personal hearing protector at the noise area and to conduct audiometric test to the workers annually. Latest audiometric test was conducted on 18/09/2023 resulted in out of 20 workers inspected, 6 of them are recommended to undergo further medical checkup with Occupational Health Doctor (OHD). Medical examination was conducted by OHD (DOSH Registration No.: HQ/18/DOC/00/00240) on 26/12/2023 and out of 6 workers re-examined, one of them is recommended referred</p>	

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator	Assessment Findings	Compliance
	<p>to Ear Nose and Throat (ENT) specialist for further evaluation. The workers have been referred to ENT Specialist on 31/01/2024 and his next appointment is on 14/05/2024 as verified in hospital appointment card.</p> <p>Bukit Puteri POM</p> <ol style="list-style-type: none"> HIRARC was established in the mill to assess and identified risks and hazards of all operations in the mill and to provide control measures to reduce and eliminate where possible the risks. Latest HIRARC was established on 06/11/2023 for new activity/work i.e.: bund wall inspection and bund wall upkeep. Among the HIRARC verified were for Kernel Plant, Boiler Operation, Sterilizer Operation, FFB Ramp and Effluent Treatment Plant. <p>Observed during site visit to the mill operation found that the workers were worn PPE as per HIRARC recommendation.</p> <ol style="list-style-type: none"> Chemical Health Risk Assessment (CHRA) has been conducted on 10/06/2020 to check the compliance to the provisions of the USECHH Regulations 2000 with respect to exposure to chemicals hazardous to health at the workplaces. Report of the CHRA is provided for verification during the audit (report no.: HQ/14/ASS/00/00001-2020/8). The assessment has been conducted by competent person with DOSH registration no.: HQ/14/ASS/00/358. Based on CHRA report, the assessment conducted at the work unit of laboratory, effluent treatment plant, water treatment plant, boiler station, kernel plant, scheduled wastes store, workshop, and chemical store. <p>Among recommendation in the CHRA report is to conducted medical surveillance and biological monitoring to the workers exposed to chemical hazards such as manganese and N-Hexane. Medical surveillance and biological monitoring were conducted on 02 to 08/05/2023 by Occupational Health Doctor (OHD) with DOSH registration no.:</p>	

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator	Assessment Findings	Compliance
	<p>HQ/14/DOC/00/369 and the result was received on 27/06/2023. Based on the results of medical surveillance, 10 of the workers who undergone medical surveillance are fit to continue their work without any abnormal result related to the chemical.</p> <p>3. Noise Risk Assessment (NRA) was conducted on 04/07/2020 and 02/02/2021 by competent person with DOSH registration no.: HQ/11/PEB/00/118. The NRA report was available for verification. All work unit that exposed to the noise exposure were assessed such as kernel plant, press station, FFB reception, effluent treatment plant, clarification station, threshing, boiler, engine room and workshop.</p> <p>Site visit at the mill workstation found that recommendation from the NRA were implemented such as fixing signage hearing protection zone at the noise area and ear plug were used as personal hearing protection (PHP) by workers at high pitch area. In addition, there is an Audiometric Test was conducted on 18/09/2023 by Occupational Health Doctor (OHD) with DOSH registration no.: HQ/18/DOC/00/00240 to all workers stationed at high pitch area such as oil extraction station, kernel plant, press station, boiler plant, engine room, workshop, and water treatment. As a result, from audiometric test, out of 66 workers inspected, 7 of them declared as having abnormal results (hearing loss, hearing impairment or permanent standard threshold shift). OHD recommended these workers to undergo medical examination. Despite that, 5 workers are having temporary standard threshold shift and need to undergo audiometric retest. All these workers were sent to medical examination and audiometric re-test on 26/12/2023. Based on the results, 2 of the workers is recommended referred to Ear Nose and Throat (ENT) specialist for further evaluation. The workers have been referred to ENT Specialist on 28/01/2024 and his next appointment is on 25/04/2024 as verified in hospital appointment card.</p>	

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		<p>4. Local Exhaust Ventilation Assessment was conducted on 09/09/2023 by competent person with DOSH registration no.: HQ/16/JHII/00/214 with report no.: HQ/16/JHII/00/214/2023-058. Checklist for hood and ducting system were made available during the audit and the inspection conducted by monthly basis as evident in the form entitled Monthly Inspection Checklist for Local Exhaust Ventilation System. Latest inspection was conducted on 01/04/2024. Frequent maintenance on the system such as to check the LEV system is conducted annually. Latest maintenance report was verified in the Periodic Inspection Examination and Testing of LEV System Report September 2023. The examination and testing of LEV system was conducted by Hygiene Technician I.</p> <p>5. Chemical Exposure Monitoring (CEM) was conducted on 03/10/2023 by Hygiene Technician I with DOSH registration no.: HQ/22/JHI/00/00063. CEM report (Ref. No.: HQ/22/JHI/00/00063-202/046) is available for verification. Among of recommendation from the CEM report are to continue usage of Local Exhaust Ventilation (fume hood) at laboratory, to continue usage of half facepiece respirator with 3M (for laboratory) and N95 particulate respirator (for workshop and schedule waste operator) and fixing warning signage at the workplace.</p> <p>Site visit and interview with the sampled workers handling the chemical at to the laboratory, workshop and schedule waste found that the POM implement the recommendation as per CEM report.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Estate and mill were monitored the effectiveness of safety and health plan to the workers by established Occupational Safety & Health Plan for the year 2023 which listing assessment, recommendation from assessment, briefing and meeting to be conducted for year 2023. The plan had been reviewed annually, updated by the estate and mill, and approved by respective manager for estate and mill.</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator	Assessment Findings	Compliance
	<p>OSH Policy found to be clearly displayed at mill and in the estate's office. Interview with sampled workers demonstrated awareness towards occupational safety and health.</p> <p>Referring to Occupational Safety & Health Plan for the year 2023 that has been prepared by certification units. Among the safety and health plan discussed were:</p> <ol style="list-style-type: none"> 1) OSH Risk Management 2) OSH Structure 3) Incident Reporting 4) Emergency Preparedness & Response 5) Chemical Safety Management 6) Contractor Safety Management 7) Vehicle & Machinery safety Management 8) Communication 9) Inspection 10) Health and Hygiene Monitoring program 11) Awareness, competency & Training 12) Reporting <p>Reflecting on the above, programmes for workers health and safety were satisfactorily implemented. Estates and mill have established Training Programme for year 2023 and 2024 to ensure that safety and health plan is implemented. Quarterly workplace inspection conducted by OSH Committee to address the identified health and safety risks is a one mechanism of monitoring the safety and health plan implementation. In addition, the safety performance of estate and mill is monitored through the internal audit conducted by the Group Sustainability Department. Latest internal audit conducted on 09/01/2024 and 10/01/2024 for Bukit Puteri Estate and POM respectively.</p>	

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Rapid 4 system is also used for monitoring accident cases occurred in the estate and mill. As mentioned in indicator 3.6.1, medical surveillance and audiometric test programme was conducted by the estate and mill annually as recommended in the CHRA and NRA report. To report unsafe act/condition in the workplace, e-Sime+ System is used as a mechanism for monitoring. For Bukit Puteri estate and POM, the latest updated in the system was on 15/04/2024. The system tabulates the time of reporting, classification of issue, reprimanded, issue details, action taken and status of the issue. Moreover, supervising safety of the workers is part of responsibility of staff, assistant manager, and manager of each operating unit. Hence, monitoring safety and health plan is done through directly involvement from management.</p> <p>OSH minutes meeting (conducted quarterly) and muster call briefing was discussed the results of the above monitoring mechanism and appropriate action are taken.</p>	
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>A documented training programme has been developed and available for Bukit Puteri Estate and Bukit Puteri POM. Training Plan for year 2023 and 2024 are listing trainings covering aspects of safety, health, environment and social which involves staff, workers, and contractors. It also found the training programme covers all aspects of the RSPO P&C requirements. Training evaluation form were provided to the workers after training session to evaluate status of their competency.</p> <p>Furthermore, estate and mill visited has established training needs of individual employees prior to planning and implementation of the training programme/plan with purpose to provide the specific skill and competency required to all employees based on their job description. The training analysis was conducted based on the job designation and training required by the job</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance																
		<p>type. This has been verified in Training Requirement for Operating Units (Mills & Estate).</p> <p>Interview with sampled workers during field visit, found that the workers have been trained with their specific task, safety and emergency procedure and mention that the training was conducted on yearly basis. The training was sighted to include Gender Specific Training at estate and mill visited.</p> <p>Based on the documents reviewed and interview conducted, it was concluded that the training program has been effectively established.</p>																	
3.7.2	Records of training are maintained. - Minor Compliance -	<p>Records of trainings were maintained by the mill and all estates visited. It was observed that the records consist of all necessary information (attendance, photos, and training contents). Example of the verified records are as follows:</p> <p><u>Bukit Puteri Estate</u></p> <table><tr><th>Name of Training</th><th>Date</th></tr><tr><td>Induction Training to New Workers</td><td>05/04/2024</td></tr><tr><td>Briefing regarding contract agreement, wages calculation, grievance channels, ILO and PPE compliance to contractors</td><td>05/04/2024</td></tr><tr><td>Hearing Conservation Program</td><td>03/04/2024</td></tr><tr><td>Sexual Harassment Training</td><td>26/03/2024</td></tr><tr><td>Gender Committee Training</td><td>26/03/2024</td></tr><tr><td>Briefing to the contractor regarding RSPO</td><td>19/03/2024</td></tr><tr><td>Refresher training for tractor drivers</td><td>19/03/2024</td></tr></table>	Name of Training	Date	Induction Training to New Workers	05/04/2024	Briefing regarding contract agreement, wages calculation, grievance channels, ILO and PPE compliance to contractors	05/04/2024	Hearing Conservation Program	03/04/2024	Sexual Harassment Training	26/03/2024	Gender Committee Training	26/03/2024	Briefing to the contractor regarding RSPO	19/03/2024	Refresher training for tractor drivers	19/03/2024	Complied
Name of Training	Date																		
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Briefing to the contractor regarding RSPO	19/03/2024																		
Refresher training for tractor drivers	19/03/2024																		

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings		Compliance
		Human Right Charter, Defender and Company Policy Briefing	18/03/2024	
		PPE and Rat Baiting Refresher Training	09/03/2024	
		Refresher Training to Harvester	07/03/2024	
		First Aid Training	13/02/2024	
		PPE and Manuring Training	09/02/2024	
		PPE and Sprayer Refresher Training	06/02/2024	
		Firefighting and Drill Training	01/02/2024	
		Briefing and training on HCV, Scheduled Waste, Chemical Handling, Chemical Spillage Drill and RTE Species	14/12/2023	
		Emergency Washroom (Chemical Premix Area) Training	05/04/2023	
		<u>Bukit Puteri POM</u>		
		Name of Training	Date	
		Effective Occupational Safety & health OSH Committee Briefing	08/02/2024	
		Electrical Safety training	08/03/2024	
		Hearing Conservation Training	05/04/2024	
		Human Right Charter and Human Right Defender Training	05/04/2024	

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings		Compliance
		HIRARC Training	05/04/2024	
		e-SIME system, Safety Induction Training, Payslip Training, Force Labour, Grievance Channel Policy Training	25/03/2024	
		Contractor Safety Training	03/03/2024	
		PPE Training	26/02/2024	
		SCCS, RSPO and MSPO Training	27/03/2024	
		Schedule Waste, Safe Chemical Handling & Spillage Training	15/12/2023	
		Lock Out Tag Out (LOTO) Training	08/11/2023	
		Emergency Evacuation (Fire) Drill and Fire Extinguisher Demonstration	22/09/2023	
		Noise Risk Exposure Briefing by DOSH	18/08/2023	
		Safety Training at Workshop, Working at Height & Confined Space	07/06/2023	
		Safe Chemical Handling Training	15/06/2023	
		Effluent Treatment Plant (ETP) Training	08/06/2023	
		Permit to Work (PTW) Training	02/08/2023	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	The last RSPO SCCS Training (entitled SCCS, RSPO and MSPO Training) was conducted on 27/03/2024, attended by key personnel from various departments such as mill manager, assistant managers, laboratory, weighbridge operators, admin clerks and security. The training record was available for verification.		Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	- Minor Compliance -		
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.	NA as the mill opted for MB model.	Complied
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.	The mill receives both certified and non-certified FFB. Therefore, qualifies for the Mass Balance supply chain system and module. The volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products, were verified.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report (see Table 10).	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The parent company (SD Guthrie Berhad) is the member of RSPO. Membership No.: 1-0008-04-000-00 since 07/09/2004. Palmtrace member ID: RSPO_PO1000000192 (Bukit Puteri Oil Mill).	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <ul style="list-style-type: none"> a) Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia, Issued by Group Sustainability Department, ver. 02, dated January 2024 b) Complete and up to date records and reports in relation to RSPO SCCS were maintained and available for verification. Among the records available were Mass Balance Sheet, Internal Audit Reports, and SCCS Training records. c) Specified in Procedure section 4.0 Responsibilities; 4.1 The Head of Operating Unit shall have the overall responsibility for the implementation of SOP; 4.2 The Head of Operating Unit may assign roles to relevant personnel or invite personnel from various departments where necessary to assist in the implementation of SOP d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the Sustainable Supply chain and Traceability Procedure Section 7.0 Receiving FFB at the Mill. 	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
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 style="margin-left: 20px;">a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p style="margin-left: 20px;">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>The latest internal audit was conducted on 09/01/2024 by trained internal auditors sourced from the Group Sustainability Department (GSD). Based on the audit report, the supply chain elements were adequately covered. There was one non-conformity raised related to removal of RSPO certified volumes sold under different scheme or as conventional in the RSPO PalmTrace. The mill has identified the root-cause and taken the appropriate corrective action to close the NC. The NC was effectively closed by GSD on 09/02/2024. The results from the internal audit had been discussed by the management during their management review which was last conducted on 25/03/2024.</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>i) When certified FFB delivered to the mill from the estate, the transporters presented dispatch chit to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g., of information available in the estate's dispatch chit is as follows:</p> <ul style="list-style-type: none"> • FFB dispatch chit no. • Estate's name • Date & time of delivery • Field No. <p>ii) There has been no projected overproduction for the period under reviewed. Nonetheless, the mill is aware of the action to be taken should there be any.</p> <p>iii) Should there be any non-conforming FFB and/or documents it will be handled according to supply chain procedure.</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
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> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>The mill ensured the required information is available in document form. Based on the sampled sales/purchase contracts, all the required information by the standard was made available in several documents such as weighbridge tickets, delivery order, and commercial invoice to name a few. For the period under review, the mill has only sold certified PK physically. Certified CPO was traded under Book & Claim.</p>	Complied
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with 	<p>The mill does not outsource any of its milling activities to any third party. With regards to the contracted CPO transporter, it is stated in the contract agreement between the mill and the contractor (validity: 01/11/2023 to 31/10/2024) in Annexure 5, RSPO Supply Chain Certification Standard, that the site has legal ownership of all input material to be included in outsourced processes and CB has the access to the contractor's operation should an audit is deemed necessary. The transportation of PK is borne by the buyers.</p>	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	<p>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>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of all contractors used for the physical handling of CSPO is listed under the stakeholder list for year 2024.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No change of names and contract details of transporter for the physical handling of RSPO certified oil palm products.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>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.</p> <p>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.</p> <p>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>	<p>i) The mill has maintained the accurate, complete, up-to-date, and accessible records and reports covering all aspects of this standard, which among others are:</p> <ul style="list-style-type: none"> - Mass balance accounting - FFB dispatch documents from supplying estates - Daily Production Report - PK Transportation documents - Training records - Internal audit reports <p>ii) Records are to be kept for 3 years as addressed in their Sustainable Supply Chain and Traceability Procedure.</p> <p>iii) NA as the mill opted for MC model.</p> <p>iv) Verification of the MB accounting showed that:</p> <ul style="list-style-type: none"> a) all receipts of RSPO certified FFB and deliveries of RSPO certified PK were recorded and balanced on a three-monthly basis. b) all volumes of certified PK that were delivered were deducted from the material accounting system according to the mill's actual OER/KER c) all deliveries of certified PK were made from positive stock. 	Complied
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</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on experience and performance. It was verified that the</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	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.	estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.	
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	NA as the mill opted for MB model.	Not Applicable
3.8.16	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.	Shipping announcement in the RSPO PalmTrace platform is carried out by the mill when RSPO certified products are sold as certified to buyers. Based on samples, all the announcements were made within three months after the dispatch dates. In the previous license period (Aug 2022 to Jul 2023), there were some amounts of RSPO certified products sold as conventional which were not removed in the RSPO PalmTrace. Nonetheless, this lapse was detected in the internal audit and appropriate corrective action had been taken i.e., should there be any RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage, they shall be removed in the end date of the RSPO PalmTrace license.	Complied
3.8.17	Claims	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	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.		
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	Corporate communication which highlighting its RSPO membership and/or its commitment to the objectives and principles of RSPO was seen made on the company's website.	Complied
4.2	In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member's history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership	Verification of the company's website showed that the parent company has highlighted their RSPO membership status, and commitment to meet the standard requirements. There was no RSPO Trademark used.	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	The mill does not use the RSPO corporate logo in any of their communication tools such as company's website, letterhead, business cards, and flyers to name a few.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	The mill does not make any statement that may lead to believe that RSPO memberships by itself implies the selling of RSPO certified oil palm product.	Complied
4.5	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:	The mill does not make any statements that highlight their RSPO certification status and product-related claims.	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." • "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." • "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</p>	NA as the mill is an RSPO member under its parent company, SD Guthrie Berhad.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	<p>(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>		
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	NA as no product specific communication was made.	Not Applicable
5.1.2	Product-specific communications are voluntary.	NA as no product specific communication was made.	Not Applicable
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	NA as no product specific communication was made.	Not Applicable
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	NA as no product specific communication was made.	Not Applicable
5.1.5	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	NA as no product specific communication was made.	Not Applicable

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	<p>into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
5.1.6	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	NA as no product specific communication was made.	Not Applicable
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters,	NA as no RSPO Label was used in all the off-pack claims made.	Not Applicable

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	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.		
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Verification on the sampled shipping documents of the certified PK sales such as sales contract, weighbridge tickets, delivery order, and commercial invoice confirmed that the supply chain model and certificate number were correctly stated.	Complied
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil 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. 	NA as the facility is not a distributor or wholesaler.	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	NA as no on-pack claim was made.	Not Applicable

RSPO P&C Public Summary Report **Revision 15 (Nov 2023)**

Criterion / Indicator		Assessment Findings	Compliance
	are entitled to claim their support for the production of certified sustainable palm oil as per Module D.		
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	NA as no on-pack claim was made.	Not Applicable
	<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>	NA as no on-pack claim was made.	Not Applicable
	<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>	NA as no on-pack claim was made.	Not Applicable
	<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* 	NA as no on-pack claim was made.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>		
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	NA as no on-pack claim was made.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	NA as no on-pack claim was made.	Not Applicable
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	NA as no on-pack claim was made.	Not Applicable
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	NA as no on-pack claim was made.	Not Applicable
MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	NA as the mill opted for MB model.	Not Applicable
	If 100% of RSPO IP 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.	NA as the mill opted for MB model.	Not Applicable
Messaging			
	Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:	NA as the mill opted for MB model.	Not Applicable

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org 		
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"> RSPO Trademark that includes the tag "CERTIFIED"; or RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	NA as the mill opted for MB model.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	95% of the palm oil content must be RSPO MB-certified.	Oil palm claimed for MB certified contain of 100% CPO or PK MB-certified.	Complied
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm claimed for MB certified contain of 100% CPO or PK MB-certified.	Complied
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. • The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	No evidence of storytelling in product related communication. Thus, this requirement is not applicable.	Not Applicable
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 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. 	NA as no product-specific communications labelling was made by the facility.	Not Applicable

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	<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>SD Guthrie Berhad has established a Human Rights Charter as a commitment to respecting human rights, last updated in June 2023, which is outlined in clause 3.2, which includes, among other things, providing equal opportunities, respecting freedom of association, combatting modern slavery, enhancing health and safety measures, protecting the rights of children, and eliminating violence and harassment.</p> <p>In alignment with the United Nations Declaration on Human Rights Defenders, SD Guthrie Berhad is dedicated to preserving the confidentiality of involved parties. This commitment is upheld through the establishment of transparent operational guidelines governing the coordination, administration, and response to allegations of threats. The Human Rights Defender Policy, dated 25/03/2020 ensures that internal policies and mechanisms are in place to protect complainants from harm and address complaints regarding alleged threats made against them.</p>	Complied
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 documents review and interview, there are no cases of harassment included sexual harassment, bullying and abuse has been reported and identified 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 whistle-blowers, where</p>	<p>SD Guthrie Berhad has established Grievance Response Standard Operating Procedure, dated 18/07/2022. The procedure highlighted establishment of methods and channels available for internal and external stakeholder to issue any concern or complaint. There are workers representative meeting called</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	social dialogue on monthly basis, gender committee meeting which focused on rights and needs of women employees in addition to provided online platform such as 'Suara Kami', Oil Palm Pal (OPP) and whistleblowing. The procedure also categorized cases to determine whether the complainant's identity should be kept anonymous or not. Communication of the procedure has been done during the stakeholder's consultation conducted for both Bukit Puteri Estate and Bukit Puteri POM on 05/03/2024.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Based on interview session with sample of workers and stakeholders, it was noted that the procedure has been communicated regularly during morning mustercall, displayed at every unit of workers quarters and other strategic places. The procedure was clearly understood, even by one of the illiterate workers at Bukit Puteri POM, who demonstrated a clear grasp of it by being able to explain it during an interview.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	The on-site verification through consultations with internal and external stakeholders, as well as the review of documented records, demonstrated that both estate and mill keep all parties involved in a grievance informed about the progress, adheres to the agreed timeframe, and ensures that the outcomes are communicated to the relevant stakeholders to address the issues they raised. It was confirmed that UoC compiles their lodged complaints using the 'Suara Kami' platform for all types of complaints, accessible to both internal and external stakeholders, and the Oil Palm Pal (OPP) platform specifically for housing-related complaints from employees and workers. A review of the latest 'Suara Kami' summary reveals that two complaints were lodged regarding workers' lack of understanding of updated legal working hours. Both complaints have been closed, with evidence of a briefing on the updated working hours provided to the workers on 07/03/2024. Regarding the	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		OPP platform, it was confirmed that all high and medium priority complaints since January 2024 have been resolved, while low priority complaints are still in progress.	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	SD Guthrie Berhad has established Grievance Response Standard Operating Procedure, dated 18/07/2022. The procedure highlighted establishment of methods and channels available for internal and external stakeholder to issue any concern or complaint. Additionally, there is commitment to the Policy on Protection of Human Rights Defenders (HRDs) has been developed to offer legal action in cases where a complaint cannot be resolved internally. This policy provides alternative dispute resolution options for HRDs when internal solutions are not sufficient.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Based on interview session with internal and external stakeholders, there are numbers of contribution has been made to them by estate and mill such as: - Financial and workforce aid for planting ornamental plant at Sek Keb Kampung Keledek - Supporting transportation for worker's children to school - Providing food for kindergarten children on monthly basis - Organizing Iftar Perdana for all workers and nearby village during fasting month in 2024	Complied
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	(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	There is no changes compare to last year. There was no indication that any portion of the land overlapped with the territory of customary landowners. Bukit Puteri Estate holds a total of 7 land titles, demonstrating legal ownership for land use. The following are the sampled land titles:	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	tenure and the actual legal or customary use of the land are available. - Critical (Major) compliance -	1. Land title No.: 238; Lot No.: PT 1277; 728.433 hectares 2. Land title No.: 30; Lot No.: PT 856; 809.37 hectares	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	SD Guthrie Berhad ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development. This is clearly mentioned under clause 3.1.1 in Human Rights Charter, 2020. Based on interview session with external stakeholder, there was no land issue raised by attended local communities and adjacent estates regards to loss of legal customary right. Alternatively, during site visit at boundary area, trenches and boundary stone were maintained regularly and clearly visible.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	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. In addition, minutes of meeting with external stakeholder conducted on 05/03/2024 also indicated that there were no issues on encroachment of land with the adjacent stakeholders.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	During the audit, no issues were reported regarding the loss of legal or customary rights among indigenous peoples, local communities, or other stakeholders. This was confirmed through interviews with local communities. Boundary stones and trenches were in place to mark the land's boundaries. In addition, minutes of meeting with external stakeholder conducted on 05/03/2024 also indicated that there were no issues on encroachment of land with the adjacent stakeholders.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	During the audit, no issues were reported regarding the loss of legal or customary rights among indigenous peoples, local communities, or other stakeholders. This was confirmed through interviews with local communities. Boundary stones and trenches were in place to mark the land's boundaries. In addition, minutes of meeting with external stakeholder conducted on 05/03/2024 also indicated that there were no issues on encroachment of land with the adjacent stakeholders.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There are no recorded land disputes recorded. The boundary stones are marked on the GPS-surveyed map, and trenches are used to indicate the boundary. This was confirmed through interviews with neighbouring smallholders and local community members.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	During the audit, no issues were reported regarding the loss of legal or customary rights among indigenous peoples, local communities, or other stakeholders. This was confirmed through interviews with local communities. Boundary stones and trenches were in place to mark the land's boundaries. In addition, minutes of meeting with external stakeholder conducted on 05/03/2024 also indicated that there were no issues on encroachment of land with the adjacent stakeholders.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	During the audit, no issues were reported regarding the loss of legal or customary rights among indigenous peoples, local communities, or other stakeholders. This was confirmed through interviews with local communities. Boundary stones and trenches were in place to mark the land's boundaries. In addition, minutes of meeting with external stakeholder conducted on 05/03/2024 also indicated that there were no issues on encroachment of land with the adjacent stakeholders.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	During the audit, no issues were reported regarding the loss of legal or customary rights among indigenous peoples, local communities, or other stakeholders. This was confirmed through interviews with local communities. Boundary stones and trenches were in place to mark the land's boundaries. In addition, minutes of meeting with external stakeholder conducted on 05/03/2024 also indicated that there were no issues on encroachment of land with the adjacent stakeholders.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	No new plantations have been established on land belonging to local people, as verified through stakeholder consultations.	Complied
4.5.2	(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. - Critical (Major) compliance -	No new plantations have been established on land belonging to local people, as verified through stakeholder consultations. The estate's land statement was confirmed to show no changes in the planted area. This was cross-checked with the previous year's land statements and the MPOB license.	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples.	No new plantations have been established on land belonging to local people, as verified through stakeholder consultations. The estate's land statement was confirmed to show no changes in the planted area. This was cross-checked with the previous year's land statements and the MPOB license.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -		
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	No new plantations have been established on land belonging to local people, as verified through stakeholder consultations. The estate's land statement was confirmed to show no changes in the planted area. This was cross-checked with the previous year's land statements and the MPOB license.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	No new plantations have been established on land belonging to local people, as verified through stakeholder consultations. The estate's land statement was confirmed to show no changes in the planted area. This was cross-checked with the previous year's land statements and the MPOB license.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new plantations have been established on land belonging to local people, as verified through stakeholder consultations. The estate's land statement was confirmed to show no changes in the planted area. This was cross-checked with the previous year's land statements and the MPOB license.	Complied
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 -	No new plantations have been established on land belonging to local people, as verified through stakeholder consultations. The estate's land statement was confirmed to show no changes in the planted area. This was cross-checked with the previous year's land statements and the MPOB license.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new plantations have been established on land belonging to local people, as verified through stakeholder consultations. The estate's land statement was confirmed to show no changes in the planted area. This was cross-checked with the previous year's land statements and the MPOB license.	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 -	In the event of a dispute, the Flowchart and Procedures on Handling Land Disputes dated 01/11/2008, will be referred to manage the process. The procedure also clearly outlines the steps for compensation. Since the last audit, no new planting or customary land issues have arisen in both estate and mill that would require a Free, Prior, and Informed Consent (FPIC) process. On-site interviews with relevant external stakeholders confirmed that no new planting activities have been carried out by estate and mill management. Therefore, this requirement is not applicable.	Not Applicable
4.6.2	(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. - Critical (Major) compliance -	In the event of a dispute, the Flowchart and Procedures on Handling Land Disputes dated 01/11/2008, will be referred to manage the process. The procedure also clearly outlines the steps for compensation. Since the last audit, no new planting or customary land issues have arisen in both estate and mill that would require a Free, Prior, and Informed Consent (FPIC) process. On-site interviews with relevant external stakeholders confirmed that no new planting activities have been carried out by estate and mill management. Therefore, this requirement is not applicable.	Not Applicable
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No new planting or customary land issues have arisen in any of the estates. There is no evidence that the certification unit has undermined the legal, customary, or user rights of others. This information was confirmed through on-site consultations with relevant stakeholders.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
4.6.4	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. - Minor compliance -	No new planting or customary land issues have arisen in estate and mill. There is no evidence that the certification unit has undermined the legal, customary, or user rights of others. This information was confirmed through on-site consultations with relevant stakeholders.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	In the event of a dispute, the Flowchart and Procedures on Handling Land Disputes dated 01/11/2008, will be referred to manage the process. The procedure also clearly outlines the steps for compensation. Since the last audit, no new planting or customary land issues have arisen in both estate and mill that would require a Free, Prior, and Informed Consent (FPIC) process. On-site interviews with relevant external stakeholders confirmed that no new planting activities have been carried out by estate and mill management. Therefore, this requirement is not applicable	Not Applicable
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	In the event of a dispute, the Flowchart and Procedures on Handling Land Disputes dated 01/11/2008, will be referred to manage the process. The procedure also clearly outlines the steps for compensation. Since the last audit, no new planting or customary land issues have arisen in both estate and mill that would require a Free, Prior, and Informed Consent (FPIC) process. On-site interviews with relevant external stakeholders confirmed that no new planting activities have been carried out by estate and mill management. Therefore, this requirement is not applicable	Not Applicable
4.7.3	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.	Based on interview session with external stakeholder during the audit, there has been no issue related to loss of legal customary rights with local communities, indigenous people as well as other stakeholders.	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	There is no customary right in SOU 10 Bukit Puteri POM as the land is belong to SD Guthrie Berhad. It has been confirmed through interview with local communities and neighbouring estate.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	There is no customary right in SOU 10 Bukit Puteri POM as the land is belong to SD Guthrie Berhad. It has been confirmed through interview with local communities and neighbouring estate.	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 -	There is no customary right in SOU 10 Bukit Puteri POM as the land is belong to SD Guthrie Berhad. It has been confirmed through interview with local communities and neighbouring estate	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	There is no customary right in SOU 10 Bukit Puteri POM as the land is belong to SD Guthrie Berhad. It has been confirmed through interview with local communities and neighbouring estate	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	The prices for the current and previous periods are publicly displayed at the weighbridge office for FFB suppliers to reference. The prices paid to FFB suppliers are based on the MPOB's Monthly Average and the Mill's Oil Extraction Rate (OER) and Kernel Extraction Rate (KER). As the mill operates using the MB module, it accepts both certified and non-certified FFB. However, non-certified FFB is sourced only from approved plantations and collection centers. The FFB suppliers are listed in the Bukit Puteri POM FFB Supplier list.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	There are no smallholders included in the SOU 10 Bukit Puteri POM certification, Nonetheless, approved FFB suppliers understand that the pricing for FFB is based on the Malaysian Palm Oil Board's (MPOB) monthly average for Crude Palm Oil (CPO) and Palm Kernel (PK). Interviews with the FFB suppliers confirm that they are aware of Bukit Puteri pricing mechanism as stated in Schedule 3 of the Contract Agreement between SDP and the FFB Suppliers.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	The pricing for FFB is determined based on the MPOB monthly average price. This pricing structure was confirmed by cross-checking the self-billed invoices issued to the FFB suppliers. Verification of the contract agreements showed that all FFB suppliers agreed to the pricing terms by signing the contracts.	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
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>	There is no binding contract between the mill and out-growers that involves financial arrangements, such as loans or credit, with repayment through FFB price deductions for replanting or other support mechanisms.	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	Verification of the contract agreements showed that all FFB suppliers agreed to the pricing terms by signing the contracts. This is indicated that the contracts were fair, legal and made transparent to the contractors with the terms and conditions.	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>	Bukit Puteri POM ensures that all agreed payments to its declared OCP are in a timely manner in accordance to the contract agreement which is on or before the 10th day of the following month. Payments were processed at the headquarters level, and upon reviewing the payment vouchers, it was confirmed that payments were made in a timely manner.	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 mill regularly calibrates its weighbridges, which are used to determine the tonnage of FFB for all suppliers and CPO and PK shipped to buyer. The most recent calibration was performed on 17/04/2024, by Metrology Corporation Malaysia Sdn Bhd.</p> <p>- Weighbridge #1: Serial number C037051237, reference C3-ATK-00019, with a 60 MT capacity from Mettler Toledo IND 246.</p>	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual	This is not applicable since there are no independent smallholders within the certification unit.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	<p>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>		
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>	This is not applicable since there are no independent smallholders within the certification unit.	Not Applicable
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 the mill operates using the MB module, it accepts both certified and non-certified FFB. However, non-certified FFB is sourced only from approved plantations and collection centers. The FFB suppliers are listed in the Bukit Puteri POM FFB Supplier list. This is not applicable since there are no independent smallholders within the certification unit.</p> <p>However, during the external stakeholder meeting held on 05/03/2024, it was confirmed that SOU 10's management representative briefed the attendees, including small/medium estates and collection centre's representative, about RSPO certification. However, none of the attendees expressed interest in pursuing certification. This was further confirmed during an interview session with a sample of external stakeholders by the auditor</p>	Complied
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>As the mill operates using the MB module, it accepts both certified and non-certified FFB. However, non-certified FFB is sourced only from approved plantations and collection centers. The FFB suppliers are listed in the Bukit Puteri POM FFB Supplier list. This is not applicable since there are no independent smallholders within the certification unit.</p>	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	As the mill operates using the MB module, it accepts both certified and non-certified FFB. However, non-certified FFB is sourced only from approved plantations and collection centres. The FFB suppliers are listed in the Bukit Puteri POM FFB Supplier list. This is not applicable since there are no independent smallholders within the certification unit.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	As the mill operates using the MB module, it accepts both certified and non-certified FFB. However, non-certified FFB is sourced only from approved plantations and collection centres. The FFB suppliers are listed in the Bukit Puteri POM FFB Supplier list. This is not applicable since there are no independent smallholders within the certification unit.	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 the mill operates using the MB module, it accepts both certified and non-certified FFB. However, non-certified FFB is sourced only from approved plantations and collection centers. The FFB suppliers are listed in the Bukit Puteri POM FFB Supplier list. This is not applicable since there are no independent smallholders within the certification unit.	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 -	SD Guthrie Berhad's Human Rights Charter, revised in 2020, explicitly states that the company will not tolerate any form of discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation, or age. During audits at both estate and mill, there was no evidence of discriminatory practices. Foreign workers from various origins and genders are treated equally and given the same opportunities. This was confirmed through interviews with workers from different nationality, job scope, employment status and genders.	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	During the audit, evidence shows that no workers experienced any kind of discrimination from management, as confirmed through interviews, site visits, and record reviews. Sampled women workers were treated equally to other workers, receiving the same pay for similar job scopes, and received same benefits. All workers including foreign workers, were provided with housing in the same compound and received the same benefits. Additionally, no recruitment fees were charged to foreign workers hired in 2023, as verified through interviews with newly recruited employees.	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	Evidence indicates that the estate and mill conduct recruitment of local workers on capabilities and qualifications. This was verified through interviews session with the local workers. While for promotion of workers are based on the work performance, suitability, and the leadership quality of the worker. While recruitment of foreign workers is managed by the Human Resource Department at headquarters, following the relevant regulatory requirements and each of operating unit's workers ratio requirements. A sample of 27 workers from various countries, races, and genders was reviewed through interviews and documentation such as medical check-up reports and interview records.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	No pregnancy tests are conducted at any of the estate and mill. This was confirmed through interviews with the Hospital Assistant and female workers. If there are any cases of delayed menstruation, the Hospital Assistant advises female workers to get tested at the nearest government health clinic.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	Gender committee has been formed within to address gender-related issues and ensuring effective communication of company policies and procedures. Additionally, a representative has been designated to manage complaints regarding sexual harassment. Sighted minutes of meeting conducted on 26/03/2024 for Bukit Puteri Estate and 21/02/2024 for Bukit Puteri POM.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	There is no evidence of discrimination based on religion, gender, nationality, during recruitment. The process focuses on skills, capabilities, medical fitness, and other essential criteria. The job descriptions for each worker are the same, regardless of skin colour, religion, or race. Workers are paid according to the Minimum Wage Order 2022 without any discrimination. Interviews with both female and male workers confirmed that no discrimination has occurred.	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	SD Guthrie Berhad has entered into a Collective Agreement with the National Union of Plantation Workers (NUPW) for interested palm oil mill employees as per reviewed Collective Agreement registered on 09/03/2020 and valid until December 2022, reference number COG. NO: 057/2020. Revised collective agreement is under reviewed by management and expected to be implemented by second half of 2024. While for job other than operating unit, the wages referred to Minimum Wage Order 2022 at rate RM1500/months, RM57.69/day or RM7.21/hour. Based on employment contract reviewed for sample workers at both estate and mill, it was evident that the agreements are signed in both English and the native language of the foreign workers such as Hindi, Bangladeshi, or Bahasa Indonesia. Interview with latest foreign workers recruited, once the foreign workers arrive at the estate, they were introduced to the terms and conditions of their employment contract and given an orientation on the company's policies.	Complied
6.2.2	(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 dismissal, period of notice, etc. in	The payment details and terms of employment are clearly outlined and documented in the employment contracts that provided and signed by all workers. The employment contracts explicitly explained regards to employment duration, work hours, overtime policies, annual and medical leave entitlements,	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	<p>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>public holiday arrangements, terms for mutual termination, maternity benefits, and additional provisions. Documents reviewed indicates that these terms strictly comply with the Employment Act of 1955, the Minimum Wages Order of 2022, the SOCSO Act of 1969, the EPF Act of 1991, the EIS Act of 2017, and the MAPA/NUPW agreement.</p> <p>Payment documents such as check roll, punch card, and payslips were sighted and reviewed. The payslips provided to workers were found to offer precise and thorough details about the compensation for all work completed. Salary deductions and overtime were consistent with applicable regulations (SOCSO, EPF, EIS) and approved by Labour Office permits. None of the workers sampled had any family members working for the company.</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>Each worker were provided with copy of contract agreement upon recruitment process. The employment contracts explicitly explained regards to employment duration, work hours, overtime policies, annual and medical leave entitlements, public holiday arrangements, terms for mutual termination, maternity benefits, and additional provisions. Documents reviewed indicates that these terms strictly comply with the Employment Act of 1955, the Minimum Wages Order of 2022, the SOCSO Act of 1969, the EPF Act of 1991, the EIS Act of 2017, and the MAPA/NUPW agreement.</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 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>The essential amenities and facilities in the company-provided quarters for workers include electricity, water, and domestic waste disposal. Electricity and water are supplied by the government and their costs are deducted from the workers' salaries. The budget for housing repairs, sanitation, garden upkeep and CAPEX & OPEX from all operating units.</p> <p>During interview sessions with a sample of workers from both the estate and the mill, it was confirmed that workers are aware that the cost of government-supplied electricity and water is deducted from their salaries. This term and condition are also included in their contract agreements and is reviewed</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance									
	- Critical (Major) compliance -	<p>annually, with the most recent briefings conducted on 05/04/2024 for the estate and 25/03/2024 for the mill.</p> <p>Records of weekly on-site inspections conducted by the Medical Assistant (estate) and Quality Assurance (mill) teams on a fortnightly basis, in accordance with the updated Workers Minimum Housing and Amenities Regulation 2020, have been reviewed.</p> <table><tr><td>Estate/Mill</td><td>Date of Inspection</td><td>Remarks</td></tr><tr><td>Bukit Puteri Estate</td><td>1/4, 25/3, 18/3</td><td>Nil</td></tr><tr><td>Bukit Puteri POM</td><td>13/4, 6/4, 1/4, 23/3</td><td>Nil</td></tr></table> <p>The Workers Housing Management Procedure and the 'OilPalmPal' Digital Housing Complaint System (OPP DHCS) were implemented to monitor any damaged or broken part of the house. The general house rules are detailed under "Peraturan Umum Kompleks Perumahan Pekerja" which was displayed at every house.</p> <p>For local workers with families, each is assigned an individual house, while for foreign workers and single workers, shared housing is provided, with two people per room. Foreign workers also receive a starter kit containing basic amenities, such as a mattress and cooking utensils.</p>	Estate/Mill	Date of Inspection	Remarks	Bukit Puteri Estate	1/4, 25/3, 18/3	Nil	Bukit Puteri POM	13/4, 6/4, 1/4, 23/3	Nil	
Estate/Mill	Date of Inspection	Remarks										
Bukit Puteri Estate	1/4, 25/3, 18/3	Nil										
Bukit Puteri POM	13/4, 6/4, 1/4, 23/3	Nil										
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	During interviews, workers confirmed that they can conveniently purchase food from the nearby shop or travel to the closest town outside the estate. They typically use their own transport to reach the main guard post, where they can access public transportation to reach the nearest town.	Complied									

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator	Assessment Findings	Compliance
<p>6.2.6 A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</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><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</i></p>	<p>SD Guthrie Berhad – SOU 10 Bukit Puteri POM 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 2020 and 2022</p> <p>The management conducted Prevailing Wage Assessment based on check-roll worker for period 2023 and published in January 2024</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	<p><i>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>All the core works are performed by permanent and full-time employees in SOU 10 Bukit Puteri Palm Oil Mill and supply bases. No contract worker was employed. Contractors are commonly engaged for tasks like hiring JCB machines, road repairs, FFB transportation, and domestic waste collection. It's been verified that all machinery owned by the contractor is operated by the contractor's own local workers. Verified the master list of workers, payment documents, site visits to operational sites, and interviews with selected workers.</p>	Complied

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
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.			
6.3.1	(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. - Critical (Major) compliance -	SD Guthrie Berhad is committed to promoting freedom of association as outlined in clause 3.2.4. in their own Human Rights Charter of 2020. The clause states that Sime Darby Plantation will respect the freedom of association by allowing employees to form and join unions and engage in collective bargaining. Alternative methods of employee engagement and grievance resolution will be provided should there is situation of rights is restricted. Interviews with workers revealed no evidence of the company restricting their right to join trade unions despite of status of nationality, gender, race or religion. Workers have the freedom to join unions if they wish.	Complied
6.3.2	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. - Minor compliance -	Verified that NUPW Committee was set up at Bukit Puteri POM and its supply bases, and the minutes from the latest meeting conducted on 26/3/2024 for estate and 12/2/2024 for mill were reviewed. A management plan was developed to address the issues and corresponding actions have been taken. Interviews with the NUPW representatives confirmed that the concerns raised during the meeting have been resolved.	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	Interviews with the NUPW representatives and the workers confirmed that the representatives were freely elected by the workers, without any interference from management. It was common for new election of NUPW representative required to be conducted upon resignation of current one.	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	SD Guthrie Berhad has established a policy for child protection in its Human Rights Charter, with a commitment to child welfare outlined in clause 3.3, "Respect and Uphold Children's Rights," as revised in 2020. The policy	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	underscores SD Guthrie Berhad's commitment to protecting children from any form of maltreatment or exploitation, including child sex tourism, child trafficking, and child pornography. In clause 3.3.1, the company commits to eliminating child labor from its supply chain and states that it will not employ anyone under the age of 18 years. Field observations, interviews with workers, and verification of the workers' master list confirmed that no child labor is employed. For contractors, the implementation of Vendor Code of Business Conduct (COBC), includes clause 5.8 on the abolition of child labor and protecting children's rights. Each contractor was provided with COBC and has signed the documents accordingly.	
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	The screening procedure for hiring local workers is detailed in the SOP Hiring of Locals, dated 01/11/2019, managed by the assistant operating unit. For foreign workers, the Workforce Management Unit Liaison & Recruitment SOPP (WMU/LR-SOPP/March2016), dated 30/03/2016, outlines the recruitment process. According to the procedure, the recruitment team must follow approved guidelines, including an age requirement of 18 to 45 years old.	Complied
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	No young workers are employed in the SOU 10 Bukit Puteri POM certification unit. This has been verified through interviews with sample workers, site visits to housing compounds, operational inspections, and verification against the workers' master list including contractor workers list.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	Bukit Puteri Estate and Bukit Puteri POM have communicated the Human Rights Charter, Social Policy, and Vendor Code of Business Conduct (COBC) through stakeholder meetings and muster briefings. Both has conducted joint external stakeholder meeting for this purpose on 5/3/2024.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	<p>SD Guthrie Berhad continues to follow the Group Sustainability & Quality Policy Statement signed by the Group Managing Director on 02/12/2019. This policy includes the following commitments:</p> <ol style="list-style-type: none"> 1. Elimination of Violence and Sexual Harassment 2. Eradication of Any Form of Exploitation <p>No cases of harassment have been identified or reported in any of the operating units, as confirmed through interviews with workers.</p> <p>For example, the policy was communicated on 26/2/2024 during muster briefing at Bukit Puteri Estate.</p>	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	<p>SD Guthrie Berhad's Human Rights Charter of 2020 contains a commitment to protecting reproductive rights, clearly outlined in clause 3.2.5. The policy has been effectively implemented, with no management restrictions related to pregnancy, and no pregnant or breastfeeding women are assigned tasks involving chemicals. This has been further confirmed through interviews with gender committee representative and female workers.</p> <p>Communication of the policy sighted based on briefing records for each operating units and further verified based on interview with the stakeholders and workers which can demonstrate their understanding on the policy that has been established</p>	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	<p>Upon verification, evidence indicates that all new mothers have been assessed and consulted, and no special requests have been raised by them, except for breaks for breastfeeding and hospital appointments. Evidence of consultation was reviewed on 25/11/2023 and this is confirmed through interview with sample of new mothers.</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad has developed Grievances Response Standard Operating Procedure dated 18/07/2022. This procedure allows complaints and grievances to be submitted by affected parties, including internal and external stakeholders. The procedure specifies time frames for addressing internal and external communications, outlined in Section 2.2, which includes a flow chart of the process, and Section 3.3, which describes the time scale for investigations.</p> <p>Additionally, there is also implementation of 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> <p>Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established, and communicated to them.</p> <p>No grievance issues that require the implementation of the mechanism occurs in all operating units within SOU 10 since the last audit.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. Contract substitution Involuntary overtime 	<p>After conducted interview with samples of workers, documents review and observation, it can be concluded that:</p> <ol style="list-style-type: none"> Retention of documents: Identity documents or passport are not retained unless necessary for passport or work permit renewal. Workers are free to keep their own identity documents and site verification at their house confirmed there is designated drawer for workers to keep their identity document safely. Charging of recruitment fee: No recruitment fees are imposed on workers, as outlined in the contracts SD Guthrie Berhad with their workers. Worker 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages <p>- Critical (Major) compliance -</p>	<p>interviews have further indicated that they have not incurred any recruitment fees.</p> <p>c. Involuntary overtime: Workers have the option to either accept or decline any overtime offers from their superiors. Based on their job requirements and positions, workers are informed by their supervisors or mandores, and they can voluntarily fill out an overtime consent form for record-keeping purposes.</p> <p>d. Lack of freedom to resign: According to employment agreement of samples of workers, there are no specific terms and conditions outlined for resignations, and the operating units will bear the cost of flight tickets in such cases.</p> <p>e. Debt bondage: Verification of pay slips of the samples of workers affirmed that there is no such evidence of debt bondage among the local and foreign workers. Workers claimed that there is no loan of money provided by the management especially during their early employment phase. Expenses from their hometown to the estates and mill are all covered by company hence there is no debt bondage implemented.</p> <p>Withholding of wages: Workers' wages have been disbursed through direct to their accounts and can be withdrawn at the nearest bank. Signed evidence of payment by the workers has been provided. There is no evidence of any workers' wages being withheld, which has been additionally confirmed through interviews.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Verification of master list of workers indicates that there are migrant workers from India, Indonesia, and Bangladesh employed in Bukit Puteri Estate and Bukit Puteri POM. SD Guthrie Berhad adheres to its Human Rights Charter, ss part of its commitment to managing migrant workers responsibly and in compliance with standards, which includes the following commitments:</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		<p>a. Ensuring equal opportunities for all. b. Respecting the freedom of association. c. Eradicating any manifestations of exploitation. d. Providing favourable working conditions. e. Strengthening safety and health measures.</p> <p>These commitments are designed as guideline to provide a fair, safe, and respectful workplace for all employees, including migrant workers.</p> <p>As per verification, there is evidence that the policy has been implemented where each process of recruitment has been done such as signing employment contract, interview, and consultation with migrant workers at origin countries. During interviews with a sample of workers, it was confirmed that all facilities and benefits are provided equally to all foreign workers. Additionally, workers kept their own passports, proving that they has control over their personal documents. There is no evidence of contract substitution, as all migrant workers were informed about the terms of their employment contracts in their home countries before their recruitment. This was further confirmed through interviews with the workers themselves.</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>The responsibility and accountability to ensure safety and health at each operating unit lie with the respective estate and mill manager. The estate and mill manager has been appointed by Regional Chief Executive Officer Central East Region as Chairman for OSH Committee at the respective unit. The respective estate and mill manager appoint an Assistant Manager of theirs as the person in charge of safety. OSH Committee members, representing both employer and employee of estate and mill visited were appointed. Official letters of appointment were provided to all OSH committee members for their</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator	Assessment Findings	Compliance
	<p>respective roles (i.e.: Secretary, employer representative and employee representative). OSH Committee Organization Chart was updated in all operating unit visited.</p> <p>Furthermore, visited operating unit has conducted regular meetings and two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare and discussed openly. OSH Meeting has been conducted on quarterly basis, attended by employer and employee representatives. The meeting was chaired by estate and mill manager at their respective unit. Minutes of OSH meeting was kept, and all the concern of the employees and any remedial actions taken was recorded. Workplace inspections were made prior to the committee meeting.</p> <p>Generally, among agenda discussed in the meeting are as follows:</p> <ul style="list-style-type: none"> • Safety briefing • Previous matter arising • Workplace inspection report • Laws compliance (HIRARC and annual medical surveillance) • PPE inspection • Accident report and statistic • Complaint from internal and external • Training and competency • Other matters <p>Minutes of OSH meeting for visited operating unit were verified during the audit as follows:</p>	

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Bukit Puteri Estate</u></p> <p>OSH Committee meeting was conducted on 15/12/2023 (Quarter 4), 15/09/2023 (Quarter 3), 15/06/2023 (Quarter 2) and 20/03/2023 (Quarter 1). For year 2024, the meeting was conducted on 13/03/2024 (Quarter 1).</p> <p><u>Bukit Puteri POM</u></p> <p>OSH Committee meeting was conducted on 06/12/2023 (Quarter 4), 06/09/2023 (Quarter 3), 07/06/2023 (Quarter 2) and 07/03/2023 (Quarter 1). For year 2024, the meeting was conducted on 04/03/2024 (Quarter 1).</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad has established procedures on accident and emergency to be adopted by all operating unit under the company. This was referred to document title Emergency Preparedness & Response Procedures with reference number UM/HSE/SP/02 dated 17/11/2021 and Standard Operating Procedure of Incidents, Accidents & Non-Compliance Management dated 01/05/2023 with reference number SDP/GS-HSE/SP/01. Flowchart for emergency has been placed at strategic location e.g., office notice board, store, etc. It was observed emergency contact numbers were also displayed in notice board, workstation and facilities at estate and mill visited. Furthermore, there are list of Emergency Response Plan (ERP) has been established and published as for guidance:</p> <ul style="list-style-type: none"> • ERP for emergency • ERP for natural disaster • ERP for road accident • ERP for chemical spillage • ERP for fire <p>In addition, the organization for the ERP team was established by each operating unit. Interview with sample workers found they have good</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator	Assessment Findings	Compliance
	<p>understanding on accident and emergency procedures. Portable eye wash was provided to the sprayers as verified during the field visit. While at the workstation, observed emergency shower and eyewash were installed at area which is exposed to the chemical hazards such as chemical premix area, chemical store, and laboratory. During site visit at the POM and estates, it was verified that adequate fire extinguishers and hose reels found to be located at strategic locations, operational and maintained in good conditions. Records of training consists of attendance list, photos and briefing material is available for verification. Training for fire drill and emergency response plan at each estate was conducted as follows:</p> <p><u>Bukit Puteri Estate</u> Firefighting and Drill training that was conducted on 01/02/2024.</p> <p><u>Bukit Puteri POM</u> Emergency Evacuation (Fire) Drill and Fire Extinguisher Demonstration training that was conducted on 22/09/2024.</p> <p>Observed during site visit at operating unit visited (i.e., Bukit Puteri Estate and Bukit Puteri POM) found, first aid kit is available with approved content. Record of monthly monitoring and inventory of first aid item also is available in the first aid box. First aid item was monitored by Medical Assistant at estate and mill. Interview with the person in charge at the visited area confirms that they have attended first aid training. Record of training first aid were verified during the audit. First Aid training was conducted at Bukit Puteri POM together with Bukit Puteri Estate on 13/02/2024.</p> <p>Accident record was verified during the audit. In practice, accident record and investigation were recorded and discussed during quarterly OSH meeting. JKKP 8 Form is submitted every year to Department of Occupational Safety and Health (DOSH). Sighted reporting system namely Rapid 4 System as an internal</p>	

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance									
		<p>control system to report the accident cases to HQ for investigation. Each operating unit visited has submitted the JKKP 8 form through MyKKP portal as below:</p> <table><tr><td>Estate/Mill</td><td>Reference No</td><td>Date Submission</td></tr><tr><td>Bukit Puteri Estate</td><td>JKKP 8/176763/2023</td><td>30/01/2024</td></tr><tr><td>Bukit Puteri POM</td><td>JKKP 8/174632/2023</td><td>27/01/2024</td></tr></table> <p>Sample of accident investigation for an accident occurred on 16/01/2024, involving a harvester during sickle sharpening was done by OSH Committee Members consists of employee and employer representatives and chaired by estate manager. The recommendation for an action plan has been drafted on the same date. A revised HIRARC harvesting operation for sharpening of sickle was documented on 17/01/2024.</p>	Estate/Mill	Reference No	Date Submission	Bukit Puteri Estate	JKKP 8/176763/2023	30/01/2024	Bukit Puteri POM	JKKP 8/174632/2023	27/01/2024	
Estate/Mill	Reference No	Date Submission										
Bukit Puteri Estate	JKKP 8/176763/2023	30/01/2024										
Bukit Puteri POM	JKKP 8/174632/2023	27/01/2024										
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The management provides appropriate PPE to the employees in accordance with HIRARC and Standard Operating Procedure. PPE issuance records were well maintained and made available for verification. Among information available in the record was name of employee, type of PPE, date of PPE received and receipt acknowledgement by the recipient. On-site verification and interview with workers showed that the appropriate PPE was provided to the workers. All worker sampled during the audit have been adequately trained in understanding SDS, safe working practices and the correct use of PPE. Interview with workers also revealed that each PPE they received was free, and the management did not charge any payments for the PPE. If there is any damage or it is time to change to new PPE, the worker only needs to bring the used PPE to the management and the management will issue new PPE to the worker.</p> <p>Training records regarding PPE were verified and conducted as follows:</p>	Complied									

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance															
		<p><u>Bukit Puteri Estate</u> PPE training was conducted by stages based on job assigned on 09/03/2024, 07/03/2024, 09/02/2024 and 06/02/2024.</p> <p><u>Bukit Puteri POM</u> PPE training was conducted on 26/02/2024.</p> <p>In addition, the management provides adequate shower room and soap for workers use after returning from activities involving chemical application. Lockers are also provided for convenience of employees to keep clean clothes.</p>																
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees by the organization and covered by accident insurance. Reviewed on workers profile records found that all workers are covered by the accident insurances. All local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) "Jadual Caruman" for January and February 2024 for the mill and estate visited.</p> <p>Example of records verified are as follows:</p> <p><u>Bukit Puteri Estate</u></p> <table><tr><td>Month</td><td>Total Worker</td><td>Amount</td></tr><tr><td>January 2024</td><td>306</td><td>RM9,xxx.xx</td></tr><tr><td>February 2024</td><td>305</td><td>RM9,xxx.xx</td></tr></table> <p><u>Bukit Puteri POM</u></p> <table><tr><td>Month</td><td>Total Worker</td><td>Amount</td></tr><tr><td>December 2023</td><td>78</td><td>RM5,xxx.xx</td></tr></table>	Month	Total Worker	Amount	January 2024	306	RM9,xxx.xx	February 2024	305	RM9,xxx.xx	Month	Total Worker	Amount	December 2023	78	RM5,xxx.xx	Complied
Month	Total Worker	Amount																
January 2024	306	RM9,xxx.xx																
February 2024	305	RM9,xxx.xx																
Month	Total Worker	Amount																
December 2023	78	RM5,xxx.xx																

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings			Compliance									
		<table><tr><td>January 2024</td><td>79</td><td>RM4,xxx.xx</td></tr><tr><td>February 2024</td><td>78</td><td>RM4,xxx.xx</td></tr></table>	January 2024	79	RM4,xxx.xx	February 2024	78	RM4,xxx.xx	Furthermore, workers at mill and estate have access free medical consultation and medication at the clinics located in Bukit Puteri Estate which is nearby Bukit Puteri POM. They are attended to by certified Medical Assistant. Records of medical inventory, VMO visit, and patients treated were made available for verification.					
January 2024	79	RM4,xxx.xx												
February 2024	78	RM4,xxx.xx												
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Accurate records regarding Lost Time Accident (LTA) have been maintained. Records on Lost Time Accident (LTA) metrics at the estate and mill visited were available for verification. JKKP 8 Form is submitted every year before the end of January to Department of Occupational Safety and Health (DOSH). Each operating unit visited has submitted the JKKP 8 form through MyKKP portal as below: <table><tr><td>Estate/Mill</td><td>Reference No</td><td>Date Submission</td></tr><tr><td>Bukit Puteri Estate</td><td>JKKP 8/176763/2023</td><td>30/01/2024</td></tr><tr><td>Bukit Puteri POM</td><td>JKKP 8/174632/2023</td><td>27/01/2024</td></tr></table> Further verification of the submitted JKKP 8 Form showed that no LTA were recorded for year 2023, resulting in no lost working days at the estate and mill.			Estate/Mill	Reference No	Date Submission	Bukit Puteri Estate	JKKP 8/176763/2023	30/01/2024	Bukit Puteri POM	JKKP 8/174632/2023	27/01/2024	Complied
Estate/Mill	Reference No	Date Submission												
Bukit Puteri Estate	JKKP 8/176763/2023	30/01/2024												
Bukit Puteri POM	JKKP 8/174632/2023	27/01/2024												
Principle 7: Protect, conserve and enhance ecosystems and the environment														
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.														
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	IPM plans for the estate is guided by the ARM Section 15, Crop Protection (issue no. 3, Dec 2023). Among the plans established and implemented were: i) Using barn owl (Tyto alba) to biologically suppress the rat population. ii) In order to minimize use of insecticides on leaf-eating pest, the estates			Complied									

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		<p>planted beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, along the roadsides</p> <p>iii) Establishment of legume cover crop (LCC) and chipping of felled trunks at the replanting area to prevent the breeding of rhinoceros beetles</p>	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	Based on site visit, there was no evidence of species under Global Invasive Species Database and CABI.org are used by the estate.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	Based on site visit, there was no evidence of fire is used for pest control by the estate.	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<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>	<p>The justification of all pesticides used in the estate were documented in Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Section 16: Weed Control of Agricultural Reference Manual, latest update issue no. 2, dated June 2021 was clearly stated the justification of pesticides used in the estate which includes chemical list indicates the purpose of usage (intended target), active ingredients names as well as the specific targets. All pesticides used were those officially registered under the Pesticide Act 1974. The certification units confined usage to only class II, class III & class IV pesticides.</p> <p>Among types of pesticides used with justifications included:</p> <ul style="list-style-type: none"> • Glyphosate isopropylamine 41% • Metsulfuron Methyl 20%, 	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Triclopyr Butoxy Ethyl Ester 32%, • Brodifacoum 0.005% • Cypermethrine 16% <p>All chemicals usage was based on the "need to do basis" to enhance field operations. Specific pesticides had been used to deal with respective target pest, weed, or disease. Based on the document review and inspection at the chemical store, Bukit Puteri Estates had used only class III & class IV pesticides. No illegal agrochemicals (stated by local and international laws) in particular Paraquat were used in the estates. No Class 1 chemicals had been used by the estates.</p>	
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>	Records of pesticides used and active ingredient (a.i) per Ha is monitored monthly in the "Monitoring Pesticide Usage per Hectare and per Ton FFB Production" for year 2023. Records of pesticides used (including active ingredients used and their Lethal Dosage (LD 50), quantity of usage and amount of a.i. applied) is maintained by Bukit Puteri Estate. Average a.i per ha for Bukit Puteri Estate in year 2023 is 1.21.	Complied
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>	<p>The justification of all pesticides used in the estate were documented in Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Section 16: Weed Control of Agricultural Reference Manual, latest update issue no. 2, dated June 2021 was clearly stated the justification of pesticides used in the estate which includes chemical list indicates the purpose of usage (intended target), active ingredients names as well as the specific targets. All pesticides used were those officially registered under the Pesticide Act 1974.</p> <p>Bukit Puteri Estate emphasis on implementing biological control to manage oil palm pests, such as leaf-eating pests and rats. Plan to achieved is incorporated in the documented Continuous Improvement Plan. Among the ways to achieve the plan are as below:</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Beneficial plants: Planting of beneficial plants are encouraged especially at the roadsides to increase the populations of natural predators for certain pest of oil palm.</p> <p>Calibration: Spraying equipment such as knapsacks pump and premix tanks are calibrated periodically to ensure correct dosages when applied</p> <p>Record of usage: In order to monitor the usage of chemicals, detailed record of applied agrochemicals need to be kept and updated.</p> <p>Pesticide alternative: To continue looking for agrochemicals (new chemicals) that could give better control with less rounds of spraying/applications such as Alion.</p> <p>Observed during site visit, Bukit Puteri Estate has planted beneficial plant along the estate roads and immature areas. Barn owl also were sighted in the field as verified during site visit.</p>	
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>No prophylactic use of pesticide was detected during the audit at all audited estates. This was confirmed through pesticide usage records and interviews with staff, mandores and pesticide applicator. During site visit at chemical premix area, it was observed that rate per pump for chemical usage application in the field was displayed on the notice board. Further verification found that the amount of chemical usage was based on recommendation provided on the chemical label. This indicates that chemical calibration process was in place to determines the correct amount of chemical needed and how to premix it in the water. Such practices aim to optimize the effectiveness of chemical applications while minimizing waste and potential environmental impact.</p> <p>In practice, the estates approach to pesticide usage is based on targeted, where pesticides are applied only when necessary to address specific target problem. This means that pesticides are not applied as a preventive measure before any pest related issues arise.</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Based on sampled estates Chemical Register using OSHA regulated format, there were only class III & IV chemicals used by the estates. There were no pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat used.</p>	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Trainings on safe handling of chemical and right method of spraying were given to the relevant workers which include storekeeper, pre-mixers, and herbicides sprayer. This also in line with recommendation by CHRA assessor. Various methods of training such as briefing, practical training and on-the-job supervision were used to ensure effective delivery of knowledge. Training includes spraying technique, precautions, and symptoms of toxic reactions as skin disorders, rashes, breathing difficulties or nail problems. Records of training were well maintained for verification at operating unit visited.</p> <p>Example of training verified are as below:</p> <p><u>Bukit Puteri Estate</u></p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Training for chemical handling that was conducted on 28/02/2024. • SDS training that was conducted on 02/02/2024. <u>Bukit Puteri POM</u> <ul style="list-style-type: none"> • Safe Chemical Handling Training that was conducted on 15/06/2023. <p>Precautions attached to products has been properly observed and applied as verified during interview with sampled workers that handle the chemical. During site visit at chemical activities area and chemical store of the visited operating unit, it was found that implementation of the chemical activities is according to the SDS especially for PPE usage and the emergency response. Portable signboard also displayed at areas of spraying activity. The estate has adequate facilities for mixing of pesticides and cleaning up after work.</p>	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>All mill and estates under Sime Darby Plantation adopted with Chemical Safety Management Procedure reference number UM/HSE/OCP/04 dated 09/03/2021 to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. The procedure contains the following:</p> <ul style="list-style-type: none"> • Objectives, scope, roles & responsibilities • General provision • Requirement & procedure: Procurement of chemical (selection of chemical), Assessment of chemical hazardous to health, transportation of chemical, receiving of chemicals, storage of chemical, disposal of chemical wastes, training, and maintenance of equipment. <p>During site visit at Bukit Puteri Estate and Bukit Puteri POM, it was found the following:</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Stores are locked and only authorized person allowed to enter. • Appropriate safety and warning signage • Original labelling is available for chemical, fertilizer (for Bukit Puteri Estate) and lubricants. • Spill kit is available. • Good ventilation at chemical store. <p>Chemical were mixed in the pre-mixing areas of the store that was locked. Emergency shower and eye wash were available at the pesticides store in case of any accidents happen. The water pressure was noted to be sufficient for such purpose. In addition, Safety Data Sheets (SDS) were available in the stores. The SDS are in English and Bahasa Malaysia.</p>	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>All pesticide containers were triple rinsed and punctured before being disposed to the authorised collector. Receipts of disposal were made available for verification. The last disposal was on 27/12/2023 through XXX Sdn Bhd. Some of the 20 lts containers were used to contain pre-mixed herbicides for spraying operation in the field. There was no evidence of pesticide containers are used for other purposes.</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Bukit Puteri Estate does not practice aerial spraying for agrochemicals. This was verified through on-site observation during the site visit and worker interviews.</p>	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator	Assessment Findings	Compliance
<p>7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>All chemical handlers for each operating unit were undergo medical surveillance to ensuring the health and safety of workers exposed to hazardous chemicals. The medical surveillance is conducted in accordance with the Use and Standard of Exposure to Chemical Hazardous to Health (USECHH) Regulations 2000, which is outlined in the Occupational Safety and Health Act (OSHA) 1994. In addition, one of the recommendation from the CHRA report for each operating unit is to conducted medical surveillance to the workers exposed to hazardous chemicals. The results of medical surveillance were as follows:</p> <p><u>Bukit Puteri Estate</u></p> <p>Medical surveillance was conducted by stages following workers job on 21/06/2023, 22/06/2023, 27/06/2023, 03/07/2023,11/07/2023 and 27/02/2024 (for new sprayers) by Occupational Health Doctor (OHD) with DOSH registration no.: HQ/08/DOC/00/281. The result medical surveillance has been acknowledged by the workers as verified during interview with sampled workers during field visit. All workers undergo medical surveillance is fit to continue their work without any abnormal results caused by occupational. In addition, site visit at chemical store, fertilizer store and chemical premix area found that the workers understand and able to demonstrate the used of appropriate PPE for conducting the work related to chemical as recommended in the CHRA report. Apart of medical surveillance, which is conducted yearly, monthly clinical checks are also carried out by the Medical Assistant to the workers exposed to the chemical hazards. Monthly health checking records (done at the clinics) were available and satisfactorily maintained. Health check includes eye, ear, nose, mouth, pulse, blood pressure and skin.</p> <p><u>Bukit Puteri POM</u></p> <p>Medical surveillance and biological monitoring were conducted on 02 to 08/05/2023 by Occupational Health Doctor (OHD) with DOSH registration no.: HQ/14/DOC/00/369 and the result was received on 27/06/2023. Based on the</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		results of medical surveillance, 10 of the workers who undergone medical surveillance are fit to continue their work without any abnormal result related to the occupational.	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Mill and estates under SOU 10 have prohibited women workers who are confirmed pregnant or breast-feeding to handle chemicals as per Group Sustainability & Quality Policy Statement signed by Group Managing Director dated 02/12/2019 and Human Rights Charter, revised 2020.</p> <p>Section 3.2.3 and 3.2.5 of Human Rights Charter were stated as follows:</p> <ul style="list-style-type: none"> • Section 3.2.3 Providing a safe and healthy working environment by delivering accident prevention training, risk minimisation, focused training, and providing appropriate protective equipment. • Section 3.2.5 Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation, or age. We will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. <p>The estates maintained the list of sprayers. Women workers who are confirmed pregnant or breastfeeding are required to disclose their pregnancy status to the appointed Medical Assistant during their monthly check-up, particularly if they are tasked with handling chemicals. Observed throughout the field visit and verification during interview with sampled workers, it was found that no pregnant and breastfeeding women were assigned for task related to chemicals in operating unit visited. This was corroborated by an internal memo stating that pregnant or breastfeeding women is prohibited from engaging in work involving chemicals.</p>	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
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 -	Wastes management plan was developed based on the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through landfill authorised by the Kuala Lipis District Council, and recyclable wastes were sent to recycle centres.	Complied
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Generally, the workers have demonstrated good understanding in proper disposal of wastes. The visited labour quarters were observed to be in clean conditions. Wastes were properly disposed as mentioned in Indicator 7.3.1. SW disposed through licensed contractors which were verifiable through eSwis. Spent lubricants (SW305), spent hydraulic oil (SW306) and contaminated rags (SW410) were taken by a third-party machinery service provider to their premises. DOE's approval for this practice was made available for verification.	Complied
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	There was no evidence of open fire was used for waste disposal at all the visited operating units.	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	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	ARM Section 8 covers the procedure for fertilizer application for both immature and mature. The procedure gives the guideline type of fertilizers to be used, timing to apply, dosage and placement.	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Periodic foliar sampling analysis was last conducted on 07/02/2023 to monitor the changes in nutrient status. The results of the analysis were used by the agronomist for their recommendation for fertilisers applications programme. The soil analysis is done once in 5 years. The last analysis was conducted on 24/02/2023. Analysis reports were made available for verification.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	EFB mulching was done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Bukit Puteri POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/Ha. Palm residues such as fronds and trunks were left to naturally decompose in the field which eventually be the organic nutrient enriching the soils. The POME sludge from the effluent pond desludging activity is kept in a retention pond within the ETP system. It would be applied in the field whenever necessary.	Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Records of fertiliser input were well maintained in various documents such as store issuance record, bin cards and month end account to name a few. Among the information available in the records was type of fertiliser, quantity and field number applied including date of application. Based on sampled fields, the quantity of fertilisers issued out (i.e., applied) from the store according to SAP software system was tally with the recommendations by agronomist.	Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	There were no soils classified as marginal or fragile. Based on the soil maps, among the major soil series exist in the estates are: Bungor: 21.01% Chat: 51.75% Tebok: 6.23% Kuala Brang: 6.26% Maps identifying steep terrain were also made available for verification. The current practice of the estate is to exclude the previous palms in the steep slope (> 25°) from being replanted and classified it as Conservation Set Aside (CSA). The practice was found to be well implemented based on site visit at field no. 2015.	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	Based on the visits of the replanted field no. 2015 (GPS: 4.178893, 101.896374) the palms which were previously planted in steep slope, were left untouched.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	There was no new planting at the estate.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	NA as there was no new planting at the estate.	Not Applicable
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	NA as there was no new planting at the estate.	Not Applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	NA as there was no new planting at the estate.	Not Applicable
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	NA as there was no new planting nor there was soil categorised as peat at the estate.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: 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). - Minor compliance -	NA as there was no new planting nor there was soil categorised as peat at the estate.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	NA as there was no new planting nor there was soil categorised as peat at the estate.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	NA as there was no new planting nor there was soil categorised as peat at the estate.	Not Applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.	NA as there was no new planting nor there was soil categorised as peat at the estate.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -		
7.7.6	(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -	NA as there was no new planting nor there was soil categorised as peat at the estate.	Not Applicable
7.7.7	(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -	NA as there was no new planting nor there was soil categorised as peat at the estate.	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	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:	Water management plans were in place and documented at all the sampled OUs which in general aimed to promote more efficient use and maintaining the availability of water sources and to avoid negative impacts on other users in the catchment. Based on review, it was noted that the plans have addressed the following:	OFI

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	<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>No restriction of access to clean water or contribute to pollution of water used by communities.</p> <p>The estate and mill have their sources of clean water from the privatised state government company i.e., Pengurusan Air Pahang Bhd (PAIP) for household consumption. The water supply is 24 hours/day.</p> <p>Nevertheless, the effectiveness of the campaign of “water saving”, which was incorporated in the water management plan can be further improved. Currently, based on the past 3 months records (Jan-Mar 2024), the water consumptions for domestic use were observed to be like more than 500 lt/person/day. (OFI).</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>The protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones was guided by a few references such as:</p> <ul style="list-style-type: none"> SDP’s Riparian Reserve Management dated April 2021, by Conservation and Biodiversity Unit/Group Sustainability Department <p>The RSPO Manual on BMPs for the management and rehabilitation of riparian reserves’ (April 2017) or applicable National legislation or specific environmental permit were referred in the establishment of the abovementioned references.</p>	Complied
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The mill applies the biological system with ponds in series for its treatment of effluent. The mill is disposing its effluent to waterways. The condition of the discharged effluent was analysed every month by an accredited laboratory and among the parameters analysed are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Verification of the last 12 months results showed that all the BOD results were within the regulated limit (i.e., 100 ppm).</p>	Complied
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring was done daily through</p>	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
		flowmeter readings. Based on the records, the mill has been using less than 1.50 m ³ /mt FFB per year as at to-date.	
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	This is addressed in the annual Energy Management Plan by all the sampled OUs. Among the action plans established were: <ul style="list-style-type: none"> doing regular maintenance of diesel-powered machinery educational programme for the operators on fuel saving utilisation of fibre and shell as biofuel for boiler operation Records of fossil fuel consumption were well maintained by the Ous and made available for verification. The records were also referred to update the RSPO GHG calculator.	Complied
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	Among the main sources of GHG emission identified were methane (CH) emission through POME treatment and fertiliser. Other less significant GHG emissions identified were fossil fuel consumptions and grid electricity utilisation. The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4. Based on verification of various records such as store issuance records and SAP system, all the data was found to be accurate.	Complied
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	NA as no new development area was initiated after 2014.	Not Applicable

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	- Critical (Major) compliance -		
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Plans to minimise the environmental impact were mainly established through implementing the best practices documented in the procedures and guidelines, apart from the environment management plans. Among the monitoring methods in place were on-line Continuous Emission Monitoring System (CEMS) for boiler chimney dark smoke emission, third-party environmental audit, and POME analysis. Based on verification of these monitoring records, all the regulated limits were complied.	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Newly replanting fields were observed to have no trace or signs of burning. Interview with stakeholders confirmed that there was not open burning for land preparation. The estate practises felling and chipping method in land preparation for replanting.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Signage for no open burning have been put up within the vicinity of the estate. Continuous awareness is given to workers during morning briefing. Fire response teams have also been established and trained to fight fire using the firefighting equipment prepared. There was no incident of fire breakout reported since the last assessment.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Engagement with adjacent stakeholders on fire prevention and control measures was made through Stakeholder Consultation and meeting in-person. The last stakeholder consultation was held on 05/03/2024 which includes all the operating units. Among the adjacent stakeholders that had been engaged were KKS Sg Kxxxx, and Kampung Lxxx Kxx. Other adjacent stakeholders such	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance									
		as Kg Bxxx, RTP Sg Uxxx, Kg Bxxx, Kg Sg Pxxx, and Lembaga Kemajuan Pxxxx Pxxx Pxxx, were engaged in previous sessions.										
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>	Not applicable since no new development by the certification unit.	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>An HCV assessment had been conducted internally in 2016 with report dated March 2016 by SDP GSD (formerly known as PSQM Dept.). The assessment was conducted in participatory with stakeholders including surrounding communities and government authorities. Based on the report, HCV 4 was identified to be present as the following details:</p> <table><tr><td>1</td><td>River reserve (Sg. Telang)</td><td>17.77 ha</td></tr><tr><td>2</td><td>Water catchment</td><td>2.81 ha</td></tr><tr><td>3</td><td>Pond</td><td>0.78 ha</td></tr></table>	1	River reserve (Sg. Telang)	17.77 ha	2	Water catchment	2.81 ha	3	Pond	0.78 ha	Complied
1	River reserve (Sg. Telang)	17.77 ha										
2	Water catchment	2.81 ha										
3	Pond	0.78 ha										

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

Criterion / Indicator		Assessment Findings	Compliance
	- Critical (Major) compliance -		
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable.	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>	HCV management plan was made available for verification. Generally, the main objectives of the management plan are to prevent river pollution by establishing riparian zones and preserve biodiversity by restricting human intrusion to the HCV area. Among the established action plans were creating awareness among employees about HCV and RTE and conducting monitoring of the HCV areas through patrolling.	Complied
7.12.5	<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>	There were no rights of local communities identified in HCV areas, and other conservation areas. Thus, this indicator is not applicable.	Not Applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce 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	Among the educational programmes conducted for the workers on protection of RTE were training on policy and legal compliance in relating to conservation of RTE species, regular reminder during muster call and placing of pictorial and no hunting signage. Records of training were made available by the operating	Complied

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

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

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2023 for Bukit Puteri Oil Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2023 for Bukit Puteri Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	1.68	OER	20.87
PKO	1.68	KER	4.47

Production	t/yr	Land Use	Ha
FFB Process	70,101.92	OP Planted Area	12,064.57
CPO Produced	14,629.02	OP Planted on peat	0
PKO Produced	3,130.64	Conservation (forested)	0
		Conservation (non-forested)	65.16
		Total	12,129.73

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	35097.58	0.90	398.20	0.64	0	0	35495.78	
CO ₂ Emission from fertilizer	3277.63	0.08	6.20	0.01	0	0	3283.83	
NO ₂ Emission	1561.32	0	0	0	0	0		
Fuel Consumption	16.56	0.04	0	0	0	0	1561.32	
Peat Oxidation	0	0	0.45	0	0	0	17.01	
Sink								
Crop Sequestration	-27292.43	-0.70	-337.95	-0.54	0	0	-27630.38	
Conservation Sequestration	0	0	0	0	0	0	0	
Total	12660.66	0.32	66.90	0.11	3429.20	0	16156.76	

*Note: Includes both estates and smallholders

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	13741.16	0.20
Fuel Consumption	1.91	0
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	13743.07	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

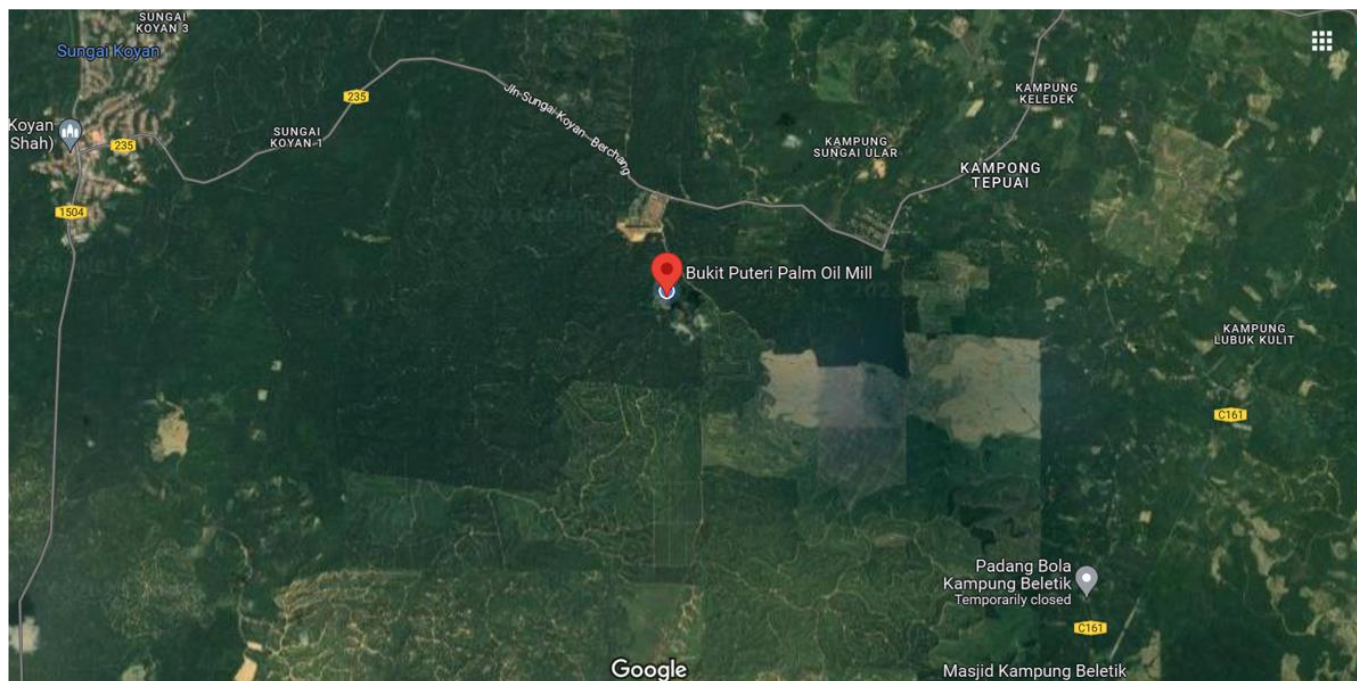
Emissions	tCO ₂ e
PK from own mill	NA
PK from other source	NA
Fuel Consumptions	NA
Total Crusher emissions	NA

*This mill has no kernel crusher operation.

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

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

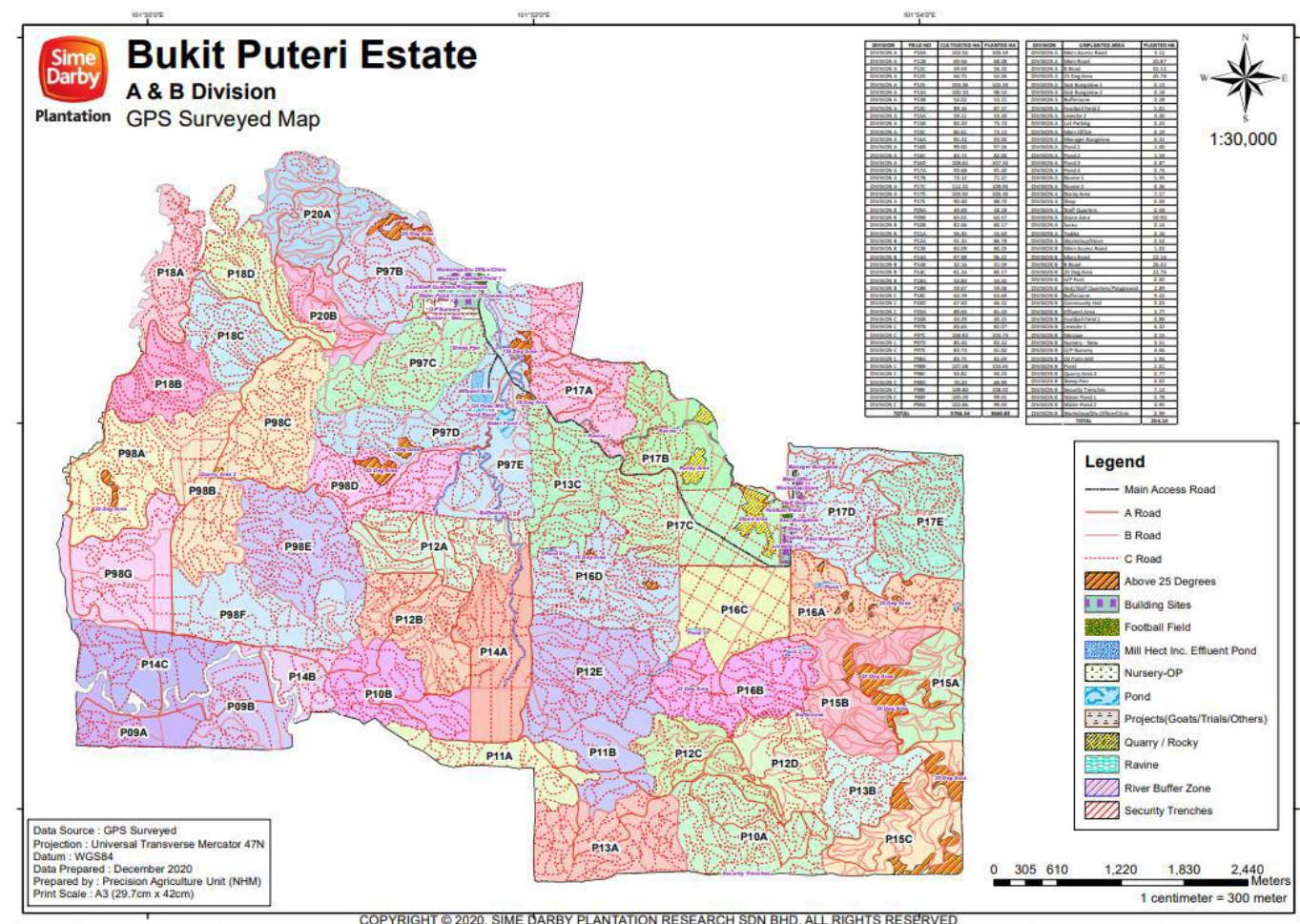
Appendix C: Location Map of Certification Unit and Supply bases



RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Appendix D: Estate Field Maps



RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

Appendix E: List of Smallholder Registered and/or sampled

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

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

RSPO P&C Public Summary Report

Revision 15 (Nov 2023)

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