

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment** (Choose an item.)
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

<p><b>Client Company Name / Parent Company:</b>  <b>SD Guthrie Berhad</b>  <i>(formerly known as Sime Darby Plantation Berhad)</i></p>
<p>Client Company / Parent Company Address:  Level 11, Main Block, Plantation Tower, No 2, Jalan PJU 1A/7, Ara Damansara,  47301 Petaling Jaya, Selangor, Malaysia</p>
<p>Certification Unit:  <b>Strategic Operating Unit (SOU 4) - Flemington Palm Oil Mill</b></p> <p>Location of Certification Unit:  Lot 5138, Jalan Sg Dulang, Sungai Sumun, 36309 Teluk Intan, Perak, Malaysia</p>
<p>Date of Final Report:  02/07/2024</p>

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**Section 1: Scope of the Assessment**

1. Company Details			
<b>Parent Company</b>	SD Guthrie Berhad ( <i>formerly known as Sime Darby Plantation Berhad</i> )		
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	07/09/2004
<b>Address</b>	Level 11, Main Block, Plantation Tower, No 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Strategic Operating Unit (SOU 4) - Flemington Oil Mill		
<b>Location / Address</b>	Lot 5138, Jalan Sg Dulang, Sungai Sumun, 36309 Teluk Intan, Perak, Malaysia		
<b>Website</b>	<a href="http://www.sdguthrie.com">www.sdguthrie.com</a>		
<b>Management Representative</b>	Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD) Abd Ghafar Sulaiman (SOU 4 Representative)	<b>E-mail</b>	<a href="mailto:shylaja.vasudevan@sdguthrie.com">shylaja.vasudevan@sdguthrie.com</a> <a href="mailto:kks.flemington@sdguthrie.com">kks.flemington@sdguthrie.com</a>
<b>Telephone</b>	+(603) 78484000 (HQ) +(605) 6489198 (Mill)	<b>Facsimile</b>	-

**Note:**

A significant change was initiated by the management of Sime Darby Plantation Berhad (also known as “SD Plantation” or “Company”). On 31 May 2024, they sent an email to the RSPO Secretariat, announcing their official name change to SD Guthrie Berhad. This change was further confirmed on 04 June 2024, through an announcement on the company’s official website. By 11 June 2024, the RSPO Secretariat acknowledged this change and updated the company name in the membership account to SD Guthrie Berhad, marking the completion of the transition process. Now, the company formerly known as Sime Darby Plantation Berhad operates under the new name, SD Guthrie Berhad.

2. Certification Information			
<b>Certificate Number</b>	RSPO 590802	<b>Certificate Start Date</b>	05/10/2021
<b>Date of First Certification</b>	05/10/2011	<b>Certificate Expiry Date</b>	04/10/2026
<b>Scope of Certification</b>	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>• Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>• Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Scope Extension		

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<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	60 MT/HR
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
<b>Is this a remote audit or on-site audit</b>	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682042	MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	08/02/2028
MSPO 690017	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		08/02/2028
MSPO 714138	MSPO Supply Chain Certification Standard 2018		17/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Flemington POM	Lot 5138, Jalan Sg Dulang, Sungai Sumun, 36309 Teluk Intan, Perak, Malaysia	3° 55' 40.31" N	100° 51' 25.28" E
Flemington Estate	Lot 4541, Jalan Simpang Empat - Bagan Datuk, 36309 Teluk Intan, Perak, Malaysia	3°53'26.50" N	100°52'53.30" E
Bagan Datoh Estate	Lot 3710, Bagan Datuk, 36100 Perak, Malaysia	3°59'33.80" N	100°47'24.90" E
Sabak Bernam Estate	Lot 2094, Jalan Haji Suhaimi, 45307 Sabak Bernam, Selangor, Malaysia	3° 45' 33.77" N	101° 0' 25.12" E
Sungai Samak Estate	Lot 4672, Ulu Bernam, 36500 Perak, Malaysia	3°44'57.30" N	101°08'51.90" E

5. Description of Supply Base					
<b>New Planting Development</b>	<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
Flemington Estate	1,619.34	7.38	205.65	1,832.37	88.37
Bagan Datoh Estate	3,574.83	2.00	205.03	3,781.86	94.53

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Sabak Bernam Estate	2,344.36	1.24	166.19	2,511.79	93.33
Sungai Samak Estate	2,766.43	7.81	251.50	3,025.74	91.43
<b>Total</b>	<b>10,304.96</b>	<b>18.43</b>	<b>828.37</b>	<b>11,151.76</b>	<b>92.41</b>

**Note:** Flemington Estate - Reduction 74.47 Ha due to land sale to third parties (Private sector) Effective in June 2023.

<b>6. Plantings &amp; Cycle</b>						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Flemington Estate	137.63	1,137.83	343.88	-	1,481.71	137.63
Bagan Datoh Estate	81.95	2,232.51	1,162.61	97.76	3,492.88	81.95
Sabak Bernam Estate	160.62	1,970.04	213.70	-	2,183.74	160.62
Sungai Samak Estate	-	833.98	1,932.45	-	2,766.43	-
<b>Total (ha)</b>	<b>380.20</b>	<b>6,174.36</b>	<b>3,652.64</b>	<b>97.76</b>	<b>9,924.76</b>	<b>380.20</b>

**Note:** Only Mature area is considered as production area

<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2022 – Sept 2023)	Actual (Aug 22 – Jul 23)		Forecast (Oct 2023 – Sept 2024)
		Previous license period (Aug 22 – Sep 22)	Current license period (Oct 22 – Jul 23)	
Flemington Estate	41,610.81	4616.23	23571.30	36,673.00
Bagan Datuk Estate	52,198.00	7319.51	46022.99	81,941.72
Sungai Samak Estate	49,092.16	7317.57	35127.69	61,747.00
Sabak Bernam Estate	76,685.80	5659.15	24724.42	52,877.80
<b>Total</b>	<b>219,586.77</b>	<b>154,358.86</b>		<b>233,239.52</b>

Notes:

Despite adding the MB Module in the Scope of Certification, Flemington Oil Mill still only processes FFBs from its owned supply bases (Flemington Estate, Bagan Datuk Estate, Sungai Samak Estate, Sabak Bernam Estate), and other SDP owned plantations/estates that are certified against the RSPO P&C.

In line with this operational framework, any RSPO Identity Preserved (IP) Certified Sustainable Palm Oil (CSPO) or RSPO IP Certified Sustainable Palm Kernel (CSPK) products are only downgraded to RSPO Mass Balance (MB) CSPO or RSPO MB CSPK after being loaded into the truck tank or truck trailer for transportation to the refinery or KCP, as determined by the Global Trading Marketing (GTM) Department.

Therefore, for the period of Jun 2024 – Sep 2024, the forecast volume as below:

Products	Forecast (Jun 2024 – Sept 2024)	
	FFB	IP

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	MB	1.00 MT
CSPO	IP	39,816.92 MT
	MB	1.00 MT
CSPK	IP	6,466.41 MT
	MB	1.00 MT

The estimated volume of 1 metric ton (MT) for each MB (Mass Balance) product is intended for PalmTrace data entry despite no actual MB volume processed.

<b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b>				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2022 – Sept 2023)	Actual (Aug 22 – Jul 23)		Forecast (Oct 2023 – Sept 2024)
		Previous license period (Aug 22 – Sep 22)	Current license period (Oct 22 – Jul 23)	
Seri Intan Estate		-	100.99	
Sabrang Estate		94.08	855.75	
Sogomana Estate		-	1,260.30	
Sungai Wangi Estate		-	926.93	
Bikam Estate		-	68.86	
<b>Total</b>		<b>3,306.91</b>		

<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2022 – Sept 2023)	Actual (Aug 22 – Jul 23)		Forecast (Oct 2023 – Sept 2024)
		Previous license period (Aug 22 – Sep 22)	Current license period (Oct 22 – Jul 23)	
NA	NA	NA	NA	NA
<b>Total</b>	<b>NA</b>	<b>NA</b>		<b>NA</b>

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Aug 2022	12,898.33	-	12,898.33
2	Sept 2022	12,108.21	-	12,108.21
3	Oct 2022	12,367.94	-	12,367.94

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4	Nov 2022	9,138.29	-	9,138.29
5	Dec 2022	14,218.30	-	14,218.30
6	Jan 2023	10,808.24	-	10,808.24
7	Feb 2023	11,918.38	-	11,918.38
8	Mar 2023	12,193.27	-	12,193.27
9	Apr 2023	13,070.65	-	13,070.65
10	May 2023	17,336.75	-	17,336.75
11	June 2023	15,464.86	-	15,464.86
12	July 2023	16,142.55	-	16,142.55
<b>TOTAL</b>		<b>157,665.77</b>	<b>-</b>	<b>157,665.77</b>

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

Estimated last year (Oct 2022 – Sept 2023)	Actual (Aug 22 – Jul 23)		Forecast (Oct 2023 – Sept 2024)
	Previous license period (Aug 22 – Sep 22)	Current license period (Oct 22 – Jul 23)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
219,586.77 mt	25,006.54 mt	132,659.23 mt	233,239.52 mt
	<b>TOTAL</b>	157,665.77 mt	
<b>CPO (OER: 20.42%)</b>	<b>CPO (OER: 19.49%)</b>		<b>CPO (OER: 20.59%)</b>
44,839.62 mt	4,795.98 mt	25,931.63 mt	48,024.02 mt
	<b>TOTAL</b>	30,727.63 mt	
<b>PK (KER: 4.78%)</b>	<b>PK (KER: 4.47%)</b>		<b>PK (KER: 4.85%)</b>
10,496.25 mt	1,084.90 mt	5,960.46 mt	11,312.12 mt
	<b>TOTAL</b>	7,045.36 mt	

**Note:**

- 1) Low FFB processed and production resulting to low CPO and PK production due to low crop received supplying estate (Shortage of harvester, Increase of harvesting round, and interference of rainfall pattern). The forecast yield was verified and confirmed based on Sime Darby 2023 recruitment planning which will reduce harvester to area ratio and increase harvesting rounding, 2022 rain fall pattern and consideration of prime age of the OP for FFB sent to the Mill.
- 2) Despite adding the MB Module in the Scope of Certification, Flemington Oil Mill still only processes FFBs from its owned supply bases (Flemington Estate, Bagan Datuk Estate, Sungai Samak Estate, Sabak Bernam Estate), and other SDP owned plantations/estates that are certified against the RSPO P&C.  
 In line with this operational framework, any RSPO Identity Preserved (IP) Certified Sustainable Palm Oil (CSPO) or RSPO IP Certified Sustainable Palm Kernel (CSPK) products are only downgraded to RSPO Mass Balance (MB) CSPO or RSPO MB CSPK after being loaded into the truck tank or truck trailer for transportation to the refinery or KCP, as determined by the Global Trading Marketing (GTM) Department.  
 Therefore, for the period of Jun 2024 – Sep 2024, the forecast volume as below:

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Products	Forecast (Jun 2024 – Sept 2024)	
	FFB	IP
MB		1.00 MT
CSPO	IP	39,816.92 MT
	MB	1.00 MT
CSPK	IP	6,466.41 MT
	MB	1.00 MT

The estimated volume of 1 metric ton (MT) for each MB (Mass Balance) product is intended for PalmTrace data entry despite no actual MB volume processed.

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Aug 2022	2,495.42	580.98
2	Sept 2022	2,300.57	503.92
3	Oct 2022	2,342.22	502.73
4	Nov 2022	1,734.87	365.46
5	Dec 2022	2,687.84	602.84
6	Jan 2023	2,068.00	474.00
7	Feb 2023	2,328.44	557.95
8	Mar 2023	2,498.56	593.53
9	Apr 2023	2,567.53	622.00
10	May 2023	3,489.16	827.47
11	Jun 2023	3,256.34	738.01
12	Jul 2023	2,958.68	676.47
<b>TOTAL</b>		<b>30,727.63</b>	<b>7,045.36</b>

11. Summary of Actual Volume sold					
Current License period (Oct 2022 – Jul 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	13,897.97	-	-	11,050.60	24,948.57
<b>PK (MT)</b>	5,419.62	-	-	-	5,419.62
<b>Credits</b>	-	-	-	-	-
Previous License period (Aug 2022 – Sept 2022)					



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<b>CPO (MT)</b>	556.18	-	-	-	556.18
<b>PK (MT)</b>	1,537.65	-	-	-	1,537.65
<b>Credits</b>	-	-	-	-	-

Note:

Current remaining balance in PalmTrace:

CSPO: 39,816.92 MT

CSPK: 6,466.41 MT

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>Certified CPO Sold (MT)</b>	<b>Certified PK Sold (MT)</b>
1.	xx	TR-37e50aca-f92b	-	37.53
2.	xx	TR-6b3c6121-a4d0	-	100.00
3.	xx	TR-5e818649-1470	-	127.98
4.	xx	TR-931c7c60-d11b	-	300.00
5.	xx	TR-12243f61-89ae	79.19	-
6.	xx	TR-16654876-5b15	713.05	-
7.	xx	TR-f5364d91-45ce	277.79	-
8.	xx	TR-52568e53-1a7b	235.73	-
9.	xx	TR-1943a6c2-cb32	38.85	-
10.	xx	TR-a4c5ba40-ed9c	118.79	-
11.	xx	TR-92cce1d5-02ad	40.17	-
12.	xx	TR-c50917dd-b4f2	157.01	-
13.	xx	TR-1815a63c-8c47	40.11	-
14.	xx	TR-61905a89-d6a6	198.16	-
15.	xx	TR-158c9e0d-443a	158.45	-
16.	xx	TR-3be7782e-8a15	38.95	-
17.	xx	TR-5f789210-c821	357.09	-
18.	xx	TR-d4b86c38-a413	-	88.92
19.	xx	TR-b5df9e3a-b123	-	212.32
20.	xx	TR-eac8eb14-e633	-	142.02
21.	xx	TR-a38b968e-1db4	319.38	-
22.	xx	TR-eeef97b9-4e6a	159.89	-
23.	xx	TR-2919b8a4-db7f	200.86	-
24.	xx	TR-bba65b88-c7e6	198.31	-

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25.	xx	TR-8332a98e-07a4	160.36	-
26.	xx	TR-eb6b1ecb-f393	198.16	-
27.	xx	TR-243d7480-9f10	40.14	-
28.	xx	TR-4f07228b-8057	38.76	-
29.	xx	TR-c4a178dd-4e51	40.15	-
30.	xx	TR-fd70164d-6674	39.16	-
31.	xx	TR-0a9b55af-da65	239.44	-
32.	xx	TR-25bcebae-19ca	80.31	-
33.	xx	TR-97e50c4d-a778	39.76	-
34.	xx	TR-776b2a40-9eb0	-	9.15
35.	xx	TR-afc835d8-6a73	-	526.76
36.	xx	TR-cf54dd84-68bb	-	29.08
37.	xx	TR-206169c8-5b71	-	2.16
38.	xx	TR-338fd6be-be01	-	39.11
39.	xx	TR-03397237-11f8	-	38.12
40.	xx	TR-f8486952-4602	159.1	-
41.	xx	TR-8e889a68-7d57	39.15	-
42.	xx	TR-507ce506-00b4	120.42	-
43.	xx	TR-2e08d8f2-04b5	198.11	-
44.	xx	TR-1bd694df-d737	80.08	-
45.	xx	TR-f0dd92ec-a087	39.74	-
46.	xx	TR-3d5f5e3a-0bdd	39.11	-
47.	xx	TR-f531ecfb-b497	199.24	-
48.	xx	TR-9dc533e7-af86	238.47	-
49.	xx	TR-a860f7d0-a8c0	238.11	-
50.	xx	TR-2f17702a-4c33	120.1	-
51.	xx	TR-e92ec504-658f	39.97	-
52.	xx	TR-ff24e40c-983b	238.13	-
53.	xx	TR-b21a7191-64b1	80.07	-
54.	xx	TR-af2db1cc-0a0c	39.04	-
55.	xx	TR-e2f0c79e-941c	-	150.78
56.	xx	TR-2a8fa1a8-3794	120.17	-
57.	xx	TR-27fc3920-a530	80.06	-
58.	xx	TR-072d53ff-5d90	40.06	-

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59.	xx	TR-249e2bca-d056	237.12	-
60.	xx	TR-6e31ed95-d906	160.24	-
61.	xx	TR-255a7782-c65d	198.53	-
62.	xx	TR-23397beb-c440	158.88	-
63.	xx	TR-1709cacc-54d3	80.07	-
64.	xx	TR-197dd1c5-ab1b	38.9	-
65.	xx	TR-7101e0b4-40c5	40.08	-
66.	xx	TR-9a6b01b7-8aee	39.14	-
67.	xx	TR-d6ae6f70-8dd9	39.04	-
68.	xx	TR-7ac2e845-ed4b	-	44.64
69.	xx	TR-d1979fa8-03d3	-	600
70.	xx	TR-1afac885-ec13	-	240.07
71.	xx	TR-4c6773fd-236a	79.88	-
72.	xx	TR-5190df01-5a90	156.95	-
73.	xx	TR-b9252b38-c712	157.82	-
74.	xx	TR-e2ad2270-2631	40.05	-
75.	xx	TR-6f427a14-0813	39.94	-
76.	xx	TR-2df5454b-9399	80.05	-
77.	xx	TR-568b496e-5159	119.15	-
78.	xx	TR-e2b78d11-abbb	159.17	-
79.	xx	TR-5bea6ea4-2ad1	238.32	-
80.	xx	TR-e1eec31c-c3ac	199.58	-
81.	xx	TR-19b89eb9-90f1	40.11	-
82.	xx	TR-7c25122a-d7c1	198.22	-
83.	xx	TR-4bb142df-75b0	40.18	-
84.	xx	TR-fa088377-5f8b	357.96	-
85.	xx	TR-c781426f-9846	-	405.36
86.	xx	TR-c6b82849-bf98	-	11.35
87.	xx	TR-2dbe7bab-4de7	159.22	-
88.	xx	TR-a2740666-045d	78.42	-
89.	xx	TR-c2ad0745-4c73	39.54	-
90.	xx	TR-16145174-6a3e	199.34	-
91.	xx	TR-258d3994-5eeb	39.94	-
92.	xx	TR-4de60990-a075	159.03	-

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93.	xx	TR-fd33c801-ccfe	39.21	-
94.	xx	TR-4a875155-757e	198.22	-
95.	xx	TR-d20a8cb9-08cb	120.15	-
96.	xx	TR-6dde8b0f-d48a	198.34	-
97.	xx	TR-697d3d6b-554e	78.56	-
98.	xx	TR-19374e64-36b9	197.82	-
99.	xx	TR-c65a1ae4-862f	160.06	-
100.	xx	TR-cdb37367-52fc	159.2	-
101.	xx	TR-7a692b76-5bb4	119.07	-
102.	xx	TR-ec7d0ce9-58d7	158.9	-
103.	xx	TR-321be8ca-2499	157.26	-
104.	xx	TR-00eb4648-2317	79.02	-
105.	xx	TR-4bea5c39-afcb	38.95	-
106.	xx	TR-10a0b94c-09c2	198.66	-
107.	xx	TR-9d1933fd-3f2a	237.64	-
108.	xx	TR-c3c3fec3-7669	119.09	-
109.	xx	TR-3f042790-a40c	-	270.24
110.	xx	TR-7731c831-c2d3	-	238.65
111.	xx	TR-ae2f2bfa-cc44	80.06	-
112.	xx	TR-9c99d11e-8296	237.28	-
113.	xx	TR-37456bfa-2fe6	120	-
114.	xx	TR-56b58f02-0238	40.02	-
115.	xx	TR-6a349c49-5fda	118.89	-
116.	xx	TR-48da35f5-1331	198.97	-
117.	xx	TR-46345695-1f3a	80.28	-
118.	xx	TR-930ea799-3a81	157.84	-
119.	xx	TR-a1660a18-4d3b	80.08	-
120.	xx	TR-a64363ed-f79f	118.39	-
121.	xx	TR-6fee0725-d422	39.32	-
122.	xx	TR-caaf3d26-ce77	-	510.15
123.	xx	TR-b8f4e12b-efe6	-	71.81
124.	xx	TR-7e92921a-33ae	-	60.6
125.	xx	TR-145585c3-e9e9	-	278.19
126.	xx	TR-f5575d64-ca26	-	450

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127.	xx	TR-61cb3e5a-c9dd	-	103.69
128.	xx	TR-63c51e26-7cb2	-	596.31
129.	xx	TR-4be15337-335b	-	25.06
130.	xx	TR-8c7815d5-9ed6	-	52.7
131.	xx	TR-9fca6962-0044	-	300
132.	xx	TR-f4ecae2e-cfb2	-	200
133.	xx	TR-d136263b-7ac0	-	5.84
134.	xx	TR-c99c42a0-5967	-	70.88
135.	xx	TR-ccec4294-b773	78.00	-
136.	xx	TR-8412943b-79f2	39.19	-
137.	xx	TR-e4fc4e4c-0604	80.21	-
138.	xx	TR-32988091-1955	119.64	-
139.	xx	TR-c8d45698-5aa0	157.63	-
140.	xx	TR-fc9bc24b-6a81	-	512.47
141.	xx	TR-660f81cd-323e	-	105.33
142.	xx	TR-d92b4624-247c	277.93	-
143.	xx	TR-0cfb1a69-79c1	278.25	-
<b>TOTAL</b>			<b>14,454.15</b>	<b>6,957.27</b>

**Note:** Data is consolidated, and each transaction were verified against PalmTrace

<b>11B. Records of certified CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	N/A	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>	<b>N/A</b>

<b>11C. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	XX	11,050.60	N/A
<b>TOTAL</b>		<b>11,050.60</b>	<b>N/A</b>

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

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1	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>

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	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
<b>TOTAL</b>		<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

**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
<b>Current License period (Not Applicable)</b>							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
<b>Previous License period (Not Applicable)</b>							
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
<b>TOTAL</b>			<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
 Suite 29.01 Level 29, The Gardens North Tower,  
 Mid Valley City, Lingkaran Syed Putra,  
 59200 Kuala Lumpur, Malaysia.  
 Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639  
 Representative: Dr. Chaiyaporn Seekao ([Chaiyaporn.Seekao@bsigroup.com](mailto:Chaiyaporn.Seekao@bsigroup.com))  
 Website: [www.bsigroup.com](http://www.bsigroup.com)

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK’s National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **07/08/2023 – 11/08/2023**. The audit programme is included as Section 2.3. With an extension of scope conducted on **08/03/2024**. The audit programs are included in 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

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of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

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

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

An Extension of Scope assessment was conducted on 08/03/2024. The objective is to verify the implementation of the certification unit's updated Supply Chain procedure therefore enable them to claim and classify their IP products as MB in the sales documents as well as in the RSPO PalmTrace platform.

**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)	Extension of Scope	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Flemington Palm Oil Mill	✓	✓	✓	✓	✓	✓
Flemington Estate	✓	✓	✓	-	✓	✓
Bagan Datuk Estate	✓	✓	✓	-	✓	✓
Sungai Samak Estate	✓	✓	✓	-	✓	✓
Sabak Bernam Estate	✓	✓	✓	-	✓	✓

**Tentative Date of Next Visit: August 7, 2024 - August 11, 2024**

**Total Number of Mandays: 15 Mandays**

**2.2 BSI Assessment Team**

Name	Role	Competency
Hafriazhar bin Mohd Mokhtar (HMM)	Team Leader	<p><b>Education:</b> Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University of Technology Malaysia.</p> <p><b>Work Experience:</b> Has more than 20 years of working experience in multiple engineering disciplines emphasized on science, technology, and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation, and mining before auditing. In summary, his started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill,</p>



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		<p>Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies.</p> <p><b>Training attended:</b> He has completed Social Auditing &amp; SMETA Training, HCV &amp; HCS Introductory Training, ISO 45001 Lead Auditor Training, MSPO Lead Auditor Training, Endorsed RSPO SCCS Lead Auditor Training, Endorsed RSPO P&amp;C Lead Auditor Training, ISO 9001 Lead Auditor Training, ISO 50001 Lead Auditor Training, ISO 14001 Lead Auditor Training, RSPO ISH Auditor Training and Endorsed RSPO Auditor Refresher Training (P&amp;C and SCCS).</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p><b>Aspect covered in this audit:</b> Policy and commitment, social requirements, contract agreement, human rights, workers’ welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land &amp; Legal issue and RSPO supply chain requirements.</p>
<p>Ahmad Rufi bin Abu Talib Khan (ARK)</p>	<p>Team Member</p>	<p><b>Education:</b> Bachelor’s degree in mechanical engineering from University of Technology MARA Shah Alam, graduated in 2015.</p> <p><b>Work Experience:</b> He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years’ experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering all over Malaysia.</p> <p><b>Training attended:</b> He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course.</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p><b>Aspect covered in this audit:</b> Legal Requirements, land &amp; legal issue, Occupational health and safety requirement, HIRARC and management plan, mill best practices, estate best practices training, environment impact assessment and management plan.</p>
<p>Haji Amir Bahari (HAB)</p>	<p>Team Member</p>	<p><b>Education:</b> Holds a Bachelor of Science (Hons) in Chemistry, University Science Malaysia &amp; a Diploma in Palm Oil Milling Tech/Management, Malaysian Palm Oil Board.</p> <p><b>Work Experience:</b> Has more than 30 years of plantation experience including managing rubber factories, palm oil mills and estates. Since 2014 he has started auditing professionally for varies scheme including RSPO and MSPO for varies accredited certification body.</p> <p><b>Training attended:</b> He successfully completed the ISO 14001 Lead Auditor Course and Endorsed RSPO P&amp;C Lead Auditor Course. He also attended HCV Awareness for RSPO/ MSPO auditors on December 2016 and RSPO HCV Audit Guidelines in April 2021.</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English</p> <p><b>Aspect covered in this audit:</b> Economic management plan, environment responsibility, environment impact assessment and management plan, natural and biodiversity conservation, Waste management, GHG and HCV .</p>

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<p>Valence (VSH) Shem</p>	<p>Team Leader for Extension of Scope Assessment</p>	<p><b>Education:</b> BTech (Hons) Bachelor’s Degree in Industrial Technology, University of Science Malaysia</p> <p><b>Work Experience:</b></p> <ol style="list-style-type: none"> <li>1) 9 years working experience in oil palm plantation industry</li> <li>2) Management system auditing since 2009 for various standards such as ISO 140001, RSPO P&amp;C, RSPO SCCS, MSPO and SMETA</li> </ol> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1) ISO 14001 Lead Auditor Course</li> <li>2) ISO 9001 Lead Auditor Course</li> <li>3) Endorsed RSPO P&amp;C Lead Auditor Course</li> <li>4) Endorsed RSPO SCCS Lead Assessor Course</li> <li>5) MSPO Awareness Training</li> <li>6) ISO 45000 Lead Auditor Course</li> <li>7) SMETA Auditor training</li> <li>8) HCV-HCS training</li> <li>9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course</li> </ol> <p><b>Aspect covered in this audit:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Good Agriculture Practice</li> <li><input type="checkbox"/> Health and Safety</li> <li><input checked="" type="checkbox"/> Supply chain requirements</li> <li><input type="checkbox"/> Social</li> <li><input type="checkbox"/> Environmental</li> <li><input type="checkbox"/> Market Communication and claim requirements</li> <li><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</li> </ul> <p><b>Language proficiency:</b> English and Bahasa Malaysia</p>
<p>Dr. Suhaili Sahari</p>	<p>Peer Reviewer</p>	<p><b>Education:</b> Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato’ Mohd Muda.</p> <p><b>Work Experience:</b> Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his</p>

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		<p>career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1. ISO 9001:2015 Lead Auditor and Internal Auditor</li> <li>2. ASI reviewer training</li> <li>3. Safety and Health</li> <li>4. ISO 14001:2015 Standard</li> <li>5. RSPO Standards: RSPO P&amp;C 2018 MY-NI 2019</li> <li>6. MSPO Standards: MS 2530: 2013 part 1, 2, 3 and 4</li> <li>7. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS</li> <li>8. HACCP MS 1480:2019</li> <li>9. GAP Standard: GLOBALGAP, Euro GAP</li> <li>10. MSPO Peer Reviewer Training 2 - 2017 by MPOCC</li> </ol> <p><b>Expertise:</b> General Management, Auditing, Environment and Plantation Management.</p>
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**Accompanying Persons:**

Name	Role
N/A	N/A

**2.3 Assessment Plan**

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

Date	Time	Subjects	HMM	ARK	HAB
Sunday, 6/8/2023	PM	Audit team travel to Teluk Intan	✓	✓	✓
Monday, 7/8/2023 Day 1	9:00 AM – 9:30 AM	Opening meeting <ul style="list-style-type: none"> <li>• Opening presentation by audit team leader</li> <li>• Confirmation of assessment scope and finalize audit plan</li> </ul>	✓	✓	✓

Date	Time	Subjects	HMM	ARK	HAB
<b>Flemington Estate</b>	9:30 AM – 12:30 PM	<b>Flemington Estate</b> Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	12:30 PM – 1:30 PM	Prayer/Lunch break	✓	✓	✓
	1:30 PM – 4:30 PM	<b>Flemington Estate</b> Document Assessment P1 – P7: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> <li>Auditors’ discussion</li> <li>Day 1 Interim Closing Briefing</li> </ul>	✓	✓	✓
Tuesday, 8/8/2023 Day 2 <b>Bagan Datoh Estate</b>	9:00 AM – 12:30 PM	<b>Bagan Datoh Estate</b> Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	10:30 AM – 12:30 PM	<b>Bagan Datoh Estate</b> Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	✓	-	-
	12:30 PM – 1:30 PM	<ul style="list-style-type: none"> <li>Prayer/Lunch break</li> </ul>	✓	✓	✓
	1:30 PM – 4:30 PM	<b>Bagan Datoh Estate</b> Document Assessment P1 – P7: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓

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Date	Time	Subjects	HMM	ARK	HAB
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> <li>Auditors’ discussion</li> <li>Day 2 Interim Closing Briefing</li> </ul>	✓	✓	✓
Wednesday, 9/8/2023  Day 3  <b>Flemington POM</b>	9:00 AM – 12:30 PM	<b>Flemington POM</b> Mill visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc.	✓	✓	✓
	10:30 AM – 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	✓	-	-
	12:30 PM – 1:30 PM	Prayer/Lunch break	✓	✓	✓
	1:30 PM – 4:30 PM	<b>Flemington POM</b> Document Assessment P1 – P7: SOPs, assessment on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation and RSPO SCC general requirements, supply chain for CPO mill, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> <li>Auditors’ discussion</li> <li>Day 3 Interim Closing Briefing</li> </ul>	✓	✓	✓
Thursday, 10/8/2023  Day 4  <b>Sungai Samak Estate</b>	9:00 AM – 12:30 PM	<b>Sungai Samak Estate</b> <ul style="list-style-type: none"> <li>Field visit: Boundary inspection, field operations, staff &amp; workers interview, buffer zone, HCV area, IPM implementation, OSH &amp; ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.</li> </ul>	✓	✓	✓
	10:30 AM – 12:30 PM	<b>Sungai Samak Estate</b> Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	✓	-	-
	12:30 PM – 1:30 PM	Prayer/Lunch break	✓	✓	✓

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Date	Time	Subjects	HMM	ARK	HAB
	1:30 PM – 4:30 PM	<p><b>Sungai Samak Estate</b></p> <p>Document Assessment P1 – P7:</p> <p>General Documentation e.g. Legal, Manual and Procedure, production &amp; monitoring records, IPM, HCV records, SEIA documents &amp; records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation &amp; etc.)</p>	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> <li>Auditors’ discussion</li> <li>Day 4 Interim Closing Briefing</li> </ul>	✓	✓	✓
Friday 11/8/2023  Day 5  <b>Sabak Bernam Estate</b>	9:00 AM – 12:30 PM	<p><b>Sabak Bernam Estate</b></p> <ul style="list-style-type: none"> <li>Field visit: Boundary inspection, field operations, staff &amp; workers interview, buffer zone, HCV area, IPM implementation, OSH &amp; ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.</li> </ul>	✓	✓	✓
	10:30 AM – 12:30 PM	<p><b>Sabak Bernam Estate</b></p> <p>Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)</p>	✓	-	-
	12:30 PM – 1:30 PM	Prayer/Lunch break	✓	✓	✓
	1:30 PM – 4:00 PM	<p><b>Sabak Bernam Estate</b></p> <p>Document Assessment P1 – P7:</p> <p>General Documentation e.g. Legal, Manual and Procedure, production &amp; monitoring records, IPM, HCV records, SEIA documents &amp; records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation &amp; etc.)</p>	✓	✓	✓
	4:00 PM – 4:30 PM	<ul style="list-style-type: none"> <li>Auditors’ discussion</li> <li>Closing meeting preparation</li> </ul>	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> <li>Closing meeting</li> </ul>	✓	✓	✓

[Extension of Scope](#)

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Date	Time	Subjects	VSH
Friday 08/03/2024	0900-0915	Opening meeting: <ul style="list-style-type: none"> <li>• Opening presentation by audit team leader</li> <li>• Confirmation of assessment scope and finalize audit plan</li> </ul>	✓
	0915-1230	1) Documentation review related to supply chain e.g., procedures, work instructions, production report, mass balance records, sales contracts, shipping documents, training records, etc. 2) Interview with PalmTrace PIC (from GTM), weighbridge operators, etc. 3) Site visit – receiving, processing and dispatch	✓
	1230-1300	Closing meeting	✓

### Section 3: Assessment Findings

#### 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
<p>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?</p>	<p>Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>On 16/01/2020, Sime Darby Plantation Berhad under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="https://simedarbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/">https://simedarbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</a></p>	<p>Complied</p>
<p>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</p>	<p>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 &amp; Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As of Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management. Refer TBP approval dated 13/07/2023.</p>	<p>Complied</p>
<p>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.</p>	<p>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.</p> <ol style="list-style-type: none"> <li>1. Ladang Panjang Estate-1,796.19 ha</li> <li>2. Rantau Panjang Estate, Napal Estate / Karang Ringin Estate- 1,843.73 ha.</li> </ol>	<p>Complied</p>



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	<p>3. Mangun Jaya Estate- 1,398.55 ha          4. Sungai Jernih Estate- 851.57 ha          5. Pelanjau Estate (PT BAL) &amp; 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</p>	
<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>Although there is deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.          Is this consistent with the ACOP reporting?</p>	<p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties were sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter:  <a href="http://www.rspo.org/certification/public-announcement">www.rspo.org/certification/public-announcement</a></p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation</p>	<p>Complied</p>

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	(Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="https://simedarbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/">https://simedarbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</a> . ACOP 2020 has been cross-referenced as below: <a href="http://www.rspo.org/members/29">www.rspo.org/members/29</a>	
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> 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
<b>Un-Certified Units or Holdings</b>		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/2023.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	New plantings within Sime Darby Plantation Berhad that have completed NPP notification. 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments <a href="https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/">https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</a> 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments <a href="https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/">https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/</a> 3. NBPOL (Ramu Agri Industries Limited) 29/01/2018 – no comments <a href="https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/">https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</a> 4. NBPOL (Ramu Agri Industries Limited) 02/09/2016 – no comments	Complied

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	<p><a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</a></p> <p>5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</a></p> <p>6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/">https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/</a></p> <p>7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/">https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/</a></p> <p>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/</a></p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</a></p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/">https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</a></p> <p>11. NBPOL (Ramu Agri Industries Ltd) 06/03/2012 - no comments captured in RSPO website: <a href="https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/">https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</a></p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website</p>	
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	<p><a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</a></p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</a></p> <p>14. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</a></p> <p>Management units for 12 – 14 above were disposed</p>	
<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&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<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&amp;C.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about land conflict has</p>	<p>Complied</p>

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	been lodge by stakeholders as at the day of audit.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p> <p>As per Internal Audit conducted in 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>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism</p>	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Sime Darby Plantation maintains corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.	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	Complied

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	the time of planting for the cases which were entered into the RACP process.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company	Complied

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?  OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable as there is no smallholder scheme under SOU 4 Flemington Certification Unit	Not Applicable

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**Approved Time Bound Plan**

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

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



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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 Ringin Estate/Karang	4,359.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Napal Ringin Estate/Karang	1,843.73	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
Indonesia	Mangun Jaya Estate	139.45	Certified	Not Applicable	16-Mar-12						

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	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					
	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					

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	Indonesia	Rantau Estate	4,638.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Matalok Estate	3,082.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Selabak Estate ( PT SAA)	3,757.67	Certified	Not Applicable	16-Mar-12					
	Indonesia	Randi Estate (PT SAA)	2,882.98	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sangkoh Estate (PT SAA)	3,789.34	Certified	Not Applicable	16-Mar-12					
	Indonesia	Lanting Estate (PT LMR)	3,249.27	Certified	Not Applicable	16-Mar-12					
Betung	Indonesia	Betung Mill	7,579.57	Certified	Not Applicable	1-Apr-14					
	Indonesia	Betung Estate	4,266.00	Certified	Not Applicable	1-Apr-14					
	Indonesia	Sekayu Estate	3,313.57	Certified	Not Applicable	1-Apr-14					
Bebunga	Indonesia	Bebunga Mill	14,274.77	Certified	Not Applicable	16-Mar-12					
	Indonesia	Bebunga Estate	3,958.43	Certified	Not Applicable	16-Mar-12					
	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					

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	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					
Pematang	Indonesia	Pematang Mill	16,601.66	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pematang 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 & Beturus	13-Jul-23

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										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					
	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					

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	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	Kalumpong Estate	2,716.80	Certified	Not Applicable	5-Oct-11					
	Malaysia	Tali Ayer Estate	3,756.10	Certified	Not Applicable	5-Oct-11					
	Malaysia	Holyrood Estate	1,332.74	Certified	Not Applicable	5-Oct-11					
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	Not Applicable	18-Jun-11					
	Malaysia	Kamuning Estate	3,888.43	Certified	Not Applicable	18-Jun-11					
	Malaysia	Elphil Estate	1,865.43	Certified	Not Applicable	18-Jun-11					
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	Not Applicable	18-Jun-11					
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	Not Applicable	5-Oct-11					
	Malaysia	Flemington Estate	1,906.84	Certified	Not Applicable	5-Oct-11					
	Malaysia	Bagan 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					

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	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					
Tenamaram	Malaysia	Tenamaram Oil Mill	10,706.26	Certified	Not Applicable	3-Mar-11					
	Malaysia	Tenamaram Estate	1,981.60	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	Not Applicable	3-Mar-11					
	Malaysia	Bukit Talang Estate	3,572.44	Certified	Not Applicable	3-Mar-11					
Bukit Kerayong	Malaysia	Bukit Kerayong Oil Mill	6,346.90	Certified	Not Applicable	15-Apr-11					
	Malaysia	Bukit Kerayong 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					

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Kerdau	Malaysia	Kerdau Oil Mill	13,781.50	Certified	Not Applicable	7-Jul-11					
	Malaysia	Kerdau Estate	5,683.04	Certified	Not Applicable	7-Jul-11					
	Malaysia	Mentakab Estate	3,266.49	Certified	Not Applicable	7-Jul-11					
	Malaysia	Chenor Estate	2,834.98	Certified	Not Applicable	7-Jul-11					
	Malaysia	Sg Mai Estate	1,996.99	Certified	Not Applicable	7-Jul-11					
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	Not Applicable	7-Jul-11					
	Malaysia	Jabor Estate	2,332.92	Certified	Not Applicable	7-Jul-11					
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	Not Applicable	30-Dec-11					
	Malaysia	Labu Estate	4,529.72	Certified	Not Applicable	30-Dec-11					
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	Not Applicable	19-May-10					
	Malaysia	Tanah Merah Estate	4,341.73	Certified	Not Applicable	19-May-10					
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	Not Applicable	19-May-10					
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sua Betong Estate	2,870.75	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sengkang Estate	2,831.51	Certified	Not Applicable	18-Feb-14					
	Malaysia	Bradwall Estate	3,828.34	Certified	Not Applicable	18-Feb-14					
	Malaysia	PD Lukut Estate	1,523.79	Certified	Not Applicable	18-Feb-14					
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sg. Bahru Estate	1,427.31	Certified	Not Applicable	18-Feb-14					
	Malaysia	Salak Estate	3,868.86	Certified	Not Applicable	18-Feb-14					
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	Not Applicable	7-Jul-11					
	Malaysia	Muar River Estate	1,584.62	Certified	Not Applicable	7-Jul-11					



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

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	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					
	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	Not Applicable	5-Oct-11					
Bukit Benut	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					
	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	Not Applicable	11-Apr-11					
Ulu Remis	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					
	Malaysia	Hadapan Oil Mill	11,371.82	Certified	Not Applicable	29-Mar-11					
Hadapan	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										

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	Malaysia	CEP Renggam Estate	3,039.63	Certified	Not Applicable	29-Mar-11					
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tunku Estate	3,199.05	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tigowis Estate	2,074.02	Certified	Not Applicable	1-Oct-08					
	Malaysia	Sentosa Estate	3,545.54	Certified	Not Applicable	1-Oct-08					
	Malaysia	Segaliud Estate	4,820.13	Certified	Not Applicable	1-Oct-08					
Melalap	Malaysia	Melalap Oil Mill	5246.18	Certified	Not Applicable	21-Jan-11					
	Malaysia	Melalap Estate	2,096.73	Certified	Not Applicable	21-Jan-11					
	Malaysia	Sapong Estate	3,149.45	Certified	Not Applicable	21-Jan-11					
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	Not Applicable	16-Jan-09					
	Malaysia	Binuang Estate	3,271.08	Certified	Not Applicable	16-Jan-09					
	Malaysia	Sungang Estate	3,407.98	Certified	Not Applicable	16-Jan-09					
	Malaysia	Tingkeyu 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					
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					

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

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	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					
	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					
	Papua New Guinea	Giligili Estate	1,095.47	Certified	Not Applicable	15-Feb-13					
	Papua New Guinea	Hagita Estate	2,450.02	Certified	Not Applicable	15-Feb-13					

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	Papua New Guinea	Waigani Estate	2,341.13	Certified	Not Applicable	15-Feb-13					
	Papua New Guinea	Sagarai Estate	2,864.55	Certified	Not Applicable	15-Feb-13					
	Papua New Guinea	Padipadi Estate	4,517.67	Certified	Not Applicable	15-Feb-13					
	Papua New Guinea	Mariawatte Estate	1,680.14	Certified	Not Applicable	15-Feb-13					
	Papua New Guinea	Smallholders - East Gurney Estate (259)	450.59	Certified	Not Applicable	15-Feb-13					
	Papua New Guinea	Smallholders - West Gurney Estate (231)	479.13	Certified	Not Applicable	15-Feb-13					
	Papua New Guinea	Smallholders - East Sagarai Estate (156)	283.93	Certified	Not Applicable	15-Feb-13					
	Papua New Guinea	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					
	Papua New Guinea	Kara Estate	1,032.10	Certified	Not Applicable	19-Mar-12					
	Papua New Guinea	Nalik Estate	2,666.75	Certified	Not Applicable	19-Mar-12					
	Papua New Guinea	West Coast Estate	627.60	Certified	Not Applicable	19-Mar-12					
	Papua New Guinea	Noatsi Estate	2,064.10	Certified	Not Applicable	19-Mar-12					

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	Papua New Guinea	Madak Estate	1,517.11	Certified	Not Applicable	19-Mar-12					
	Papua New Guinea	Smallholders -North Division (615)	1,022.12	Certified	Not Applicable	19-Mar-12					
	Papua New Guinea	Smallholders- South Division (866)	1,257.21	Certified	Not Applicable	19-Mar-12					
	Papua New Guinea	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					
	Papua New Guinea	Gusap East (Gusap) Estate	2,856.45	Certified	Not Applicable	5-Aug-10					
	Papua New Guinea	Gusap West (Paddock) Estate	3,019.09	Certified	Not Applicable	5-Aug-10					
	Papua New Guinea	Surinam Estate	2,154.14	Certified	Not Applicable	5-Aug-10					
	Papua New Guinea	Dumpu Estate	2,254.36	Certified	Not Applicable	5-Aug-10					
	Papua New Guinea	Ngaru Estate	854.33	Certified	Not Applicable	5-Aug-10					
	Papua New Guinea	J Estate (Jephcott) Estate	2,824.01	Certified	Not Applicable	5-Aug-10					
	Papua New Guinea	Smallholders - Madang VOPs (71)	360.00	Certified	Not Applicable	5-Aug-10					
	Papua New Guinea	Smallholders - Morobe VOPs (253)	283.70	Certified	Not Applicable	5-Aug-10					

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Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill		Certified	Not Applicable	1-Feb-13					
	Papua New Guinea	Mamba Oil Mill		Certified	Not Applicable	1-Feb-13					
	Papua New Guinea	Embi Estate	1,737.78	Certified	Not Applicable	1-Feb-13					
	Papua New Guinea	Ambogo Estate	2,040.00	Certified	Not Applicable	1-Feb-13					
	Papua New Guinea	Sangara Estate	1,780.00	Certified	Not Applicable	1-Feb-13					
	Papua New Guinea	Sumbiripa Estate	2,545.00	Certified	Not Applicable	1-Feb-13					
	Papua New Guinea	Mamba Estate	4,013.10	Certified	Not Applicable	1-Feb-13					
	Papua New Guinea	Sambogo Estate	2,637.85	Certified	Not Applicable	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	Not Applicable	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	Not Applicable	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	Not Applicable	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	Not Applicable	1-Feb-13					
Papua New Guinea	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	Not Applicable	1-Feb-13						



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West Britain (WNB)	New Guinea	Papua New Guinea	Mosa Oil Mill	Certified	Not Applicable	10-Sep-08					
		Papua New Guinea	Kumbango Oil Mill	Certified	Not Applicable	10-Sep-08					
		Papua New Guinea	Kapiura Mill	Certified	Not Applicable	10-Sep-08					
		Papua New Guinea	Numundo Mill	Certified	Not Applicable	10-Sep-08					
		Papua New Guinea	Waraston Mill	Certified	Not Applicable	10-Sep-08					
		Papua New Guinea	Bebere Estate	2,226.71	Certified	Not Applicable	10-Sep-08				
		Papua New Guinea	Kumbango Estate	2,610.80	Certified	Not Applicable	10-Sep-08				
		Papua New Guinea	Togulo Estate	1,509.20	Certified	Not Applicable	10-Sep-08				
		Papua New Guinea	Dami Estate	1,507.00	Certified	Not Applicable	10-Sep-08				
		Papua New Guinea	Waisisi Estate	1,090.00	Certified	Not Applicable	10-Sep-08				
		Papua New Guinea	Kautu Estate	4,280.60	Certified	Not Applicable	10-Sep-08				
		Papua New Guinea	Karausu Estate	2,387.64	Certified	Not Applicable	10-Sep-08				
		Papua New Guinea	Moroa Estate	848.16	Certified	Not Applicable	10-Sep-08				

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Papua New Guinea	Bilomi Estate	2,011.70	Certified	Not Applicable	10-Sep-08					
Papua New Guinea	Loata Estate	562.00	Certified	Not Applicable	10-Sep-08					
Papua New Guinea	Haella Estate	4,220.30	Certified	Not Applicable	10-Sep-08					
Papua New Guinea	Garu Estate	3,709.60	Certified	Not Applicable	10-Sep-08					
Papua New Guinea	Daliavu Estate	2,484.10	Certified	Not Applicable	10-Sep-08					
Papua New Guinea	Sapuri Estate	2,180.90	Certified	Not Applicable	10-Sep-08					
Papua New Guinea	Malilimi Estate	3,837.00	Certified	Not Applicable	10-Sep-08					
Papua New Guinea	Rigula Estate	3,720.00	Certified	Not Applicable	10-Sep-08					
Papua New Guinea	Nomundo Estate	2,645.17	Certified	Not Applicable	10-Sep-08					
Papua New Guinea	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	Not Applicable	10-Sep-08					
Papua New Guinea	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	Not Applicable	10-Sep-08					
Papua New Guinea	Lolokoru Estate	2,453.10	Certified	Not Applicable	10-Sep-08					
Papua New Guinea	Ove Estate	3,541.00	Certified	Not Applicable	10-Sep-08					

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	Papua New Guinea	Tamare Estate	1,362.70	Certified	Not Applicable	10-Sep-08					
	Papua New Guinea	Smallholders LSS Mosa (1822)	5,008.53	Certified	Not Applicable	10-Sep-08					
	Papua New Guinea	Smallholders VOP East (1817)	5,324.37	Certified	Not Applicable	10-Sep-08					
	Papua New Guinea	Smallholders VOP Central (1964)	5,756.57	Certified	Not Applicable	10-Sep-08					
	Papua New Guinea	Smallholders VOP West (1279)	2,804.10	Certified	Not Applicable	10-Sep-08					
	Papua New Guinea	Smallholders LSS Kapiura (551)	551.00	Certified	Not Applicable	10-Sep-08					
	Papua New Guinea	Smallholders VOP Kapiura (850)	847.00	Certified	Not Applicable	10-Sep-08					
	Papua New Guinea	Smallholders Kaulong/Akami/Pushiki/R epamira/Sakapei (20)	700.37	Certified	Not Applicable	10-Sep-08					
Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	Not Applicable	27-Mar-20				There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.	

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	Papua New Guinea	Munum Estate	1,734.57	Certified	Not Applicable	27-Mar-20					
	Papua New Guinea	Maralumi Estate	2,427.15	Certified	Not Applicable	27-Mar-20					
	Papua New Guinea	Erap Estate	1,237.68	Certified	Not Applicable	27-Mar-20					

**3.3 Details of Nonconformities**

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

During this Assessment there was one (1) Minor nonconformity raised. The Flemington Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

There was no non-conformity raised during the Extension of Scope Assessment.

Non-conformity			
<b>NCR Ref #</b>	2375460-202308-N1	<b>Issued Date</b>	11/08/2023
<b>Due Date</b>	Next Assessment Visit	<b>Closure Date</b>	"Open"
<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.3 (Minor)		
<b>Statement of Nonconformity:</b>	Records of monitoring and any actions taken are maintained and available.		
<b>Requirement Reference:</b>	Records of monitoring and actions taken were insufficiently maintained and available.		
<b>Objective Evidence:</b>	<p>Based on verification of procedure been made on the following:</p> <ol style="list-style-type: none"> <li>Occupational Safety &amp; Health Procedure – Transportation System and Machinery Procedure (Doc No: SD/SDP/PSQM(ESH)/201/0517, Date: 01/07/2012) Clause 7.1.3.3 Prevention and Control which mentioned on control on vehicle should be used and maintained in accordance with applicable laws and recommendation and appropriate be equipped with safety devices</li> <li>Permit To Work Procedure (Doc No: UM/HSE/OCP/13, Date: 10/01/2023), and Permit To Work specifically on confined spaces which is stated the liability at any time to have an atmosphere which contains potentially harmful levels of contaminants, have an oxygen deficiency or excess or cause engulfment and could have restricted means for entry and exit.</li> <li>Personal Protective Equipment (PPE) Procedure (Doc No: UM/HSE/OCP/03, Effective date: 09/03/2021) Clause 5.5 PPE Maintenance, stated that the PPE must be inspected regularly against any condition that may impact the PPE performance.</li> </ol> <p>Further checking on the checklist at Flemington Palm Oil Mill for both the Vehicle Checklist and PTW checklist found that the record stated in the checklist does not correlate with requirement stated in the procedure.</p>		

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	In Sungai Samak Estate, the PPE checking record was not sufficiently maintained against the condition that may impact the PPE Performance.
<b>Corrections:</b>	<p>a) The reverse sensor has been installed and the shovel operate as usual. Also mill has corrected the daily inspection checklist by include all the aspect as recommended in the machinery SOP.</p> <p>b) Mill already have a competent person (assistant manager) for AGT and will comply PTW for gas testing.</p> <p>c) Management team has check and ensure the PPE for all the activities are worn at work as per recommendation in Personal Protective Equipment (PPE) Procedure. OU to immediately implement stop work and rectification for noncompliance to PPE.</p>
<b>Root Cause Analysis:</b>	<p>a) OU did not check the shovel condition in accordance to the Guideline "Rukun Keselamatan" issued dated June 2022 before use as it was for emergency to replace main shovel.</p> <p>b) OU failed to check and monitor all requirement for PTW issuance including AGT validity.</p> <p>c) Mandore did not check the actual condition before filling up the checklist. Based on general observation, use of checklist is found inefficient in ensuring workers are fully wearing their PPE at all times during work.</p>
<b>Corrective Actions:</b>	<p>a) Mill has corrected the daily inspection checklist by include all the aspect as recommended in the machinery SOP. Briefing on new checklist will be provide to the drivers and if any faulty will notify immediately to the management for rectification. OU management to instill and emphasize safework procedure on Transportation as per memo number CEOUM/HSE/017/06/2022.</p> <p>b) Training on PTW will provide to all the PIC by Mill management and RSQM. Mill will ensure to comply and check if issuing PTW for any risky activities. If needed mill will request AGT personal from sister mill to ensure and fulfill the requirements of PTW.</p> <p>c) Management to instill and emphasize on the safe work culture using the ten golden rules "10 Peraturan Emas – Ladang" , especially on rules no.2 "Objek Jatuh" for harvesting activity.</p>
<b>Assessment Conclusion:</b>	The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	High commitment by Sustainability Department and operating unit's person in charge.
PF 2	Good positive relationship maintained and highlighted by internal and external stakeholders

**3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement**

<b>Previous Audit Critical (Major) Non-conformity</b>			
<b>NCR Ref #</b>	2235531-202208-M1	<b>Issued Date</b>	19/08/2022
<b>Due Date</b>	18/11/2022	<b>Closure Date</b>	03/11/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	3.8.12 (Critical)		
<b>Statement of Nonconformity:</b>	Records does not tally with actual production, sales and carry forward volume.		
<b>Requirement Reference:</b>	Record keeping 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.		
<b>Objective Evidence:</b>	Flemington POM receives and processes only RSPO certified FFB. Therefore, it uses the Identity Preserved supply chain system. The records of all received FFB and deliveries of RSPO certified CPO and PK were not balanced and updated on a real time basis in the Mass Balance Sheet.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- To conduct briefing / training on new mass balance sheet to the PIC</li> <li>- To update mass balance sheet in accordance to RSPO palm trace system</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- Mill using new mass balance sheet which provide by GSQM. Insufficient training on mass balance sheet.</li> <li>- Wrong data recorded in mass balance sheet during the initial transition from MB to IP.</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- To conduct briefing / training on new mass balance sheet to the PIC on annual basis.</li> <li>- Monitoring of mass balance sheet on monthly basis and palm trace system</li> </ul>		
<b>Assessment Conclusion:</b>	<p>Critical Non-Conformity Close Out Verification:</p> <ul style="list-style-type: none"> <li>- An RSPO SCCS Training &amp; New Balance Sheet Training has been conducted via Microsoft Teams by SDP SQM Department for the personals involved in supply chain in Flemington POM on 29/09/2022. Records of training was available for verification.</li> <li>- Mass Balance records was accurately updated and maintained. Data verified to be tally with mill production records, despatch records and Palm Trace Announcement Records.</li> </ul> <p>The correction and corrective actions have been conducted and deemed to be appropriate to address the raised Critical Non-Conformity. Hence the Critical Non-Conformity is successfully closed on 03/11/2022.</p>		
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>ASA 2_2 verification:</p> <p>The Plantation Quality Management System – Standard Operating Procedure for Sustainable Supply Chain and Traceability, Doc. No.: SD/SDP/GSD/SCCS/0522/01; Date: 2022 documented the procedure for traceability. The procedure requires validation of certificate of supplying estates.</p>		

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	<p>The procedure had identified critical control points to prevent contamination of non-certified FFB. The current traceability system is Sime Weigh System.</p> <p>The mill maintains the records of CPO/PK storage and recorded in the Daily Production Summary Report.</p> <p>For CPO and PK dispatch, the mill maintains records in Oil Dispatch Summary form. No MSPO certified products were sold since last audit.</p> <p>Records of CPO &amp; PK sales &amp; delivery including Weighbridge Tickets together with sales Delivery Note (DO Chit) and Daily Record (Daily CPO/PK Despatch Summary Logbook) were maintained based on Standard Operating Procedure. Sample of ticket as below: -</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <tr> <td style="width: 30%;">CPO</td> <td style="width: 35%;">SAMPLE 1</td> <td style="width: 35%;">SAMPLE 2</td> </tr> <tr> <td>DATE</td> <td>30/05/2023</td> <td>31/05/2023</td> </tr> <tr> <td>CHIT NO</td> <td>021653</td> <td>021657</td> </tr> <tr> <td>LORRY NO</td> <td>BLB 5142</td> <td>BLB 5142</td> </tr> <tr> <td>WEIGHT (MT)</td> <td>39,100</td> <td>38,980</td> </tr> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">PKO</td> <td style="width: 50%;">SAMPLE 1</td> </tr> <tr> <td>DATE</td> <td>31/05/2023</td> </tr> <tr> <td>CHIT NO</td> <td>021658</td> </tr> <tr> <td>LORRY NO</td> <td>VHM 3439</td> </tr> <tr> <td>WEIGHT (MT)</td> <td>32,101</td> </tr> </table> <p>These indicates that no recurrence of issue hence, Major nonconformity remained closed.</p>	CPO	SAMPLE 1	SAMPLE 2	DATE	30/05/2023	31/05/2023	CHIT NO	021653	021657	LORRY NO	BLB 5142	BLB 5142	WEIGHT (MT)	39,100	38,980	PKO	SAMPLE 1	DATE	31/05/2023	CHIT NO	021658	LORRY NO	VHM 3439	WEIGHT (MT)	32,101
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CHIT NO	021658																									
LORRY NO	VHM 3439																									
WEIGHT (MT)	32,101																									

Previous Audit Critical (Major) Non-conformity			
<b>NCR Ref #</b>	2235531-202208-M2	<b>Issued Date</b>	19/08/2022
<b>Due Date</b>	18/11/2022	<b>Closure Date</b>	03/11/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	6.2.4 (Critical)		
<b>Statement of Nonconformity:</b>	Compliance with Employee's Minimum Standards of Housing, Accommodations and Amenities Act 1990 and was not effectively demonstrated		
<b>Requirement Reference:</b>	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		



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	<p>upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>Normative reference:</p> <p>Section 23, weekly inspection of employee's housing - 1 (b): the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water.</p>
<b>Objective Evidence:</b>	<p>During site visit at line site (block D), common/main drain sighted with undergrowth which blocked the free flow of water. Based on social dialog tracker and OPP none of this issue highlighted. Observed at line site (block C), stagnant water was sighted at newly repaired outlet drain at the house backyard.</p>
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- The management has verified and removed the specific drain block which causing the stagnant water.</li> <li>- The management has removed all growth grass and saplings in all the main drain in housing complex.</li> <li>- To provide briefing to all Estate Working Group (EWG) to prioritize safety and cleanliness in housing area at their dedicated housing block.</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- Inadequate monitoring by the estate management.</li> <li>- Insufficient training and refresher briefing to the block representative (EWG).</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- The management has appointed contractor and awarded the contractor to do monthly cleaning to all main drain at housing area. This will be checked by Executive prior to payment before end of the month.</li> <li>- To provide briefing to all EWG to prioritize safety and cleanliness in housing area at their dedicated housing block on a monthly basis.</li> <li>- Executive to be involved in monthly EWG &amp; PIOA inspection.</li> <li>- To do periodic flushing (3 months once) at all main drain using water tank/tide water to avoid mud/sludge to accumulate which causing water stagnant.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Critical Non-Conformity Close Out Verification:</p> <ol style="list-style-type: none"> <li>1. The management has removed the drain block which was an unused vertical pipeline in the drain which was blocking the water from flowing. It was verified that there were no blockages, and the water was flowing freely.</li> <li>2. All grasses that were grown in the drainage system has been removed. Verified that there were no blockages due to grasses in the drainage system.</li> <li>3. A briefing has been conducted on 12/09/2022 for the EWG on housing inspection and cleanliness. The briefing records was available for verification.</li> <li>4. Sungai Samak Estate has appointed a contractor, XXXX on 01/09/2022 to conduct linesite and compound cleaning works which includes maintenance of all the drains in the linesite area. The contract agreement (Contract Agreement Number: 4300599032) was available for verification. Also verified the payment records for the month September 2022 for the linesite cleaning available for verification.</li> <li>5. The estate management has appointed En. Amir Hamzah Ahmad as the PIC to monitor the housing complex as stated in the appointment letter dated 25/09/2022 undersigned by the Estate Manager available for verification. Verified the Housing Complex Inspection records for the month of August and September 2022. The executives have verified each of the inspection forms.</li> </ol>

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	<p>6. The estate have conducted flushing of all the main drains at the linesite using motor powered water tanks. Latest flushing was conducted on 20/09/2022 and 03/10/2022. Evidence of flushing was available for verification.</p> <p>The correction and corrective actions have been conducted and deemed to be appropriate to address the raised Critical Non-Conformity. Hence the Critical Non-Conformity is successfully closed on 07/10/2022.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>ASA 2_2 verification:</p> <p>Sime Darby Plantation Berhad established Workers Housing Management Procedure 2022, Ver.01, dated 30/06/2022 as guidelines to continuously improve of living standards of their employee in estates and mill operations. Its shown company commitment in managing employee’s housing repair and maintenance through digital platform named Digital Housing Complaint system or ‘OilPalmPal’.</p> <p>Management has provided a safe, livable workers housing condition in accordance with Workers Minimum Standard of Housing &amp; Amenities (Amendment) 2091 (Act A 1604).</p> <p>Policies related to workers housing &amp; amenities management in the operating units as below:</p> <ul style="list-style-type: none"> <li>• Workers minimum standard of housing amenities guidelines –Jan 2015</li> <li>• IOM – employees housing inspection &amp; welfare – Dec 2020</li> <li>• IOM – rules &amp; regulations at employee house – June 2021</li> <li>• IOIM – Safe handling &amp; storage of Petrol – Mar 2021</li> <li>• IOM – Safe Fogging Procedure – June 2021.</li> </ul> <p>All workers are provided with free housing facilities that included basic amenities such as clean water, community hall, sport facilities, etc. were provided to the workers.</p> <p>Electricity which is obtained from the national grid. The housing condition was in accordance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446).</p> <p>Weekly inspections by medical assistant were done to ensure cleanliness of the housing. Records were well maintained as per sample latest inspections as following:</p> <p>Flemington Estate: 03/08/2023</p> <p>Bagan Datoh Estate: 04/08/2023</p> <p>Records indicated housing are in good condition.</p> <p>These indicates that no recurrence of issue hence, Major nonconformity remained closed.</p>

Previous Audit Minor Non-conformity			
<b>NCR Ref #</b>	2235531-202208-N1	<b>Issued Date</b>	19/08/2022
<b>Due Date</b>	18/08/2023	<b>Closure Date</b>	11/08/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.2 (Minor)		

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<b>Statement of Nonconformity:</b>	It was verified that there were lapses in the implementation of certain SOPs
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.
<b>Objective Evidence:</b>	<p>1. Sungai Samak Estate - The Mill Quality Management System under the Occupational Safety Health Manual, Chapter 9 (Chemical Safety Management) states under No. 6.0 Procedures for Handling, iii. Ensure that containers are properly labelled, not damaged and no spillage during handling. – During the visit to the Spraying Gang at Field 15A, it was sighted that there were Glyphosate and Wet &amp; Stick chemicals that were transferred and placed in containers that had no labels.</p> <p>2. Sungai Samak Estate - Tatacara Kerja Selamat Keselamatan Penggunaan Racun with reference number SSE/SOP-03 Section 3 "Aktiviti campuran racun dan air (PREMIX) hanya boleh di lakukan di tempat yang telah disediakan khas. Campuran racun (PREMIX) hanya boleh dilakukan oleh pekerja yang di latih dan lantik sahaja" – Pure chemicals were seen to have been brought into the field (2 bottles of Allion and 5 bottles of Canyon) and placed in the trailer compartment.</p>
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>To immediately remove and only to allow premixed chemical into the field.</li> <li>All premixed container is labelled with type of chemical and hazard signage.</li> <li>To provide refresher briefing to all staff, mandore and workers on the SOP of "Tatacara Kerja Selamat Keselamatan Penggunaan Racun"</li> </ol>
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>Insufficient training to workers on SOP of "Tatacara Kerja Selamat Keselamatan Penggunaan Racun".</li> <li>Inadequate monitoring by the estate management.</li> </ol>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>Store clerk to collect previous issued empty chemical container and to be disposed as waste before issuing new chemical container for current usage. Empty container will be recorded and documented.</li> <li>All Executive, Mandore &amp; Staff to be given responsibility to do regular inspection on compartment storage.</li> <li>To provide refresher briefing to all staff, mandore and workers on the SOP of "Tatacara Kerja Selamat Keselamatan Penggunaan Racun".</li> </ol>
<b>Assessment Conclusion:</b>	<p>ASA 2_2 Verification</p> <p>Verified that the store clerk adhere to the procedure of collecting previously issued empty chemical containers and ensuring their proper disposal before issuing new containers for current usage. This process now includes recording and documenting the disposal of empty containers to ensure traceability and compliance. Sighted the records of triple rinsing is available at Sungai Samak Estate.</p> <p>A comprehensive initiative has been implemented to enhance the accountability and vigilance of all executives, Mandore, and staff members. Regular inspections of compartment storage areas have been assigned as a shared responsibility to identify any potential deviations or breaches in the storage protocols.</p> <p>To reinforce understanding and compliance, a refresher briefing session on the "Tatacara Kerja Selamat Keselamatan Penggunaan Racun" Standard Operating Procedure (SOP) was conducted for all staff members, Mandore, and workers. Training records sighted at each estate on chemical handling. Sample as following:</p> <ol style="list-style-type: none"> <li>Flemington Estate – 04/08/2023</li> <li>Sungai Samak Estate – 12/06/2023</li> </ol>

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	<p>3. Sabak Bernam Estate – 12/06/2023</p> <p>Site visit conducted for all estate verified that there is no pure chemical are being transported to the field, and premix chemical transported are properly labelled. Interview with the sprayer verified that they understand on the chemical handling and management as well as usage of PPE.</p> <p>The CAP implementation found to be effective to address the issue. Hence, Minor nonconformity has been closed on 11/08/2023.</p>
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Previous Audit Minor Non-conformity			
<b>NCR Ref #</b>	2235531-202208-N2	<b>Issued Date</b>	19/08/2022
<b>Due Date</b>	18/08/2023	<b>Closure Date</b>	11/08/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	2.1.2 (Minor)		
<b>Statement of Nonconformity:</b>	The legal reference used in the Environmental Aspect and Impact Identification EAI/2018/xx/xxx was not updated.		
<b>Requirement Reference:</b>	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.		
<b>Objective Evidence:</b>	Environmental Aspect and Impact Identification EAI/2018/xx/xxx has made legal references to an outdated version EQ (Clean Air) Reg 78 and EQ (Scheduled Waste) Reg 1989 which is presently revised to EQ (Clean Air) Reg 2014 and EQ (Scheduled Waste) Reg 2005 respectively.		
<b>Corrections:</b>	Arrange the training to review Environmental Aspect & Impact Identification.		
<b>Root Cause Analysis:</b>	Environmental Aspect & Impact Identification was reviewed by Mill Management without proper training conducted.		
<b>Corrective Actions:</b>	Conduct evaluation training Environmental Aspect & Impact Identification and review Environmental Aspect & Impact Identification. Reviewed Environmental Aspect & Impact Identification shall be verified by RSQM-NTR.		
<b>Assessment Conclusion:</b>	<p>ASA 2_2 Verification</p> <p>All the OU had made revision on the reference to legislative i.e EQ (Clean Air) Reg 2014 and EQ (Scheduled Waste) Reg 2005 respectively and other revised legislative requirement. In addition, there were a common statement " We hereby acknowledged that the Environmental Impact Evaluation (EIE) and Environmental Impact Assessment (EIA) forms have been reviewed as per latest LORR 2023".</p> <p>The CAP implementation found to be effective to address the issue. Hence, Minor nonconformity has been closed on 11/08/2023.</p>		

Previous Audit Minor Non-conformity			
<b>NCR Ref #</b>	2235531-202208-N3	<b>Issued Date</b>	19/08/2022
<b>Due Date</b>	18/08/2023	<b>Closure Date</b>	11/08/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	7.3.1 (Minor)		

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<b>Statement of Nonconformity:</b>	The waste management plan for the canteen operations/activities is not effectively implemented and monitored.
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.
<b>Objective Evidence:</b>	Flemington Palm Oil Mill - During the site visit at the mill canteen, monsoon drain and outside drain, there were traces of cooking oil waste from the canteen operations/activities flowing to the monsoon drain outside mill without mitigation plan.
<b>Corrections:</b>	1. Review and Identify mill canteen activity in pollution prevention plan 2. To establish cleaning schedule on weekly basis for mill canteen perimeter drain
<b>Root Cause Analysis:</b>	Insufficient of risk control on oil residue or other wastes from canteen
<b>Corrective Actions:</b>	1. To construct oil trap connecting to mill canteen perimeter drain 2. To establish cleaning schedule on monthly basis for the oil trap 3. To educate canteen worker on the waste management procedure 4. To provide container to dispose oil residue from the canteen
<b>Assessment Conclusion:</b>	ASA 2_2 Verification The following was sighted and verified: a) The mill has constructed oil trap underneath the washing sink connecting to mill canteen perimeter drain. Recovery is made weekly or earlier subject to intensity of kitchen utilization. b) The canteen workers had been educated ia training dated 05/11/2022 on the waste management (Pengurusan Sisa) c) Container being provided to dispose oil residue from the canteen d) The canteen and drains nearby were visited and confirmed there were no oil traces in the drain.  The CAP implementation found to be effective to address the issue. Hence, Minor nonconformity has been closed on 11/08/2023.

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

**3.3.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2235531-202208-M1	Critical	3.8.12	19/08/2022	Closed on 07/10/2022
2235531-202208-M2	Critical	6.2.4	19/08/2022	Closed on 03/11/2022
2235531-202208-N1	Minor	3.3.2	19/08/2022	Closed on 11/08/2023

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2235531-202208-N2	Minor	2.1.2	19/08/2022	Closed on 11/08/2023
2235531-202208-N3	Minor	7.3.1	19/08/2022	Closed on 11/08/2023
2375460-202308-N1	Minor	3.3.3	11/08/2023	"Open"

**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 Flemington 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.

<b>Stakeholders contacted</b>		
<b>Type of Stakeholder</b> (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	<b>Stakeholder name / organization</b>	<b>Means of communication</b> (e.g. face to face interview, email, phone interview, comment from public notice)
Teachers	SK Bagan Datoh	Face to face interview
Local community representatives	Kampung Bagan Datoh	Face to face interview
Vendors	- M.S. RXXu Enterprise - M.K. KXXXr Enterprise	Face to face interview
Authority	Hutan Melintang Police Station	Face to face interview
Workers’ representatives	- Estate NUPW representatives - Gender committee representatives	Face to face interview

<b>Stakeholders comment</b>	
<b>1</b>	<p><b>Feedbacks:</b> Teacher School representatives appreciate on the contribution and support given by the estate management. Estate has invited for stakeholder meeting and able to assist upon request.</p> <p><b>Audit Team verification and response:</b> No further actions.</p>
	<p><b>Feedbacks:</b> Local community representatives</p>

2	Community head expressed his thanks to the management for all contribution towards villagers Job opportunities has been offered to the local communities and good relationship between Mill & Estates management with nearby villagers.
	<b>Audit Team verification and response:</b> No further actions.
3	<b>Feedbacks:</b> Vendors Have long business relationship with company for more than 10 years. Proper work agreement/purchase order documents made for long-term and medium-term work with no issue in pricing and payment. Company enforced precaution in safety for hazard works delivered with mandatory PPE requirements.
	<b>Audit Team verification and response:</b> No further actions.
4	<b>Feedbacks:</b> Authority There was no report received so far related to domestic violence or crime from Mill and Estates workers. The police officer informed that they have good communications and relationship with Mill and Estates management. No other issues raised
	<b>Audit Team verification and response:</b> No further actions.
5	<b>Feedbacks:</b> Workers' representatives Sample of local and foreign workers has been interviewed. As per interview, there are no issues has been raised. Policy and procedure have been communicated to all workers. Salary payment is in line with local regulations. All workers interviewed satisfied with accommodation provided by the company.
	<b>Audit Team verification and response:</b> No further actions.

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable as the estates have undergone 2nd cycle of replanting.					

Previous land owner / user comment	
N/A	<b>Feedbacks:</b> N/A <b>Audit Team verification and response:</b> 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.



**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 Flemington 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 Flemington Oil Mill is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
<b>Name:</b> Valence Shem	<b>Name:</b> Shylaja Devi Vasudevan Nair
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> Sime Darby Plantation Bhd
<b>Title:</b> Lead Auditor	<b>Title:</b> Head, Sustainability Compliance Unit, Group Sustainability Dept.
<b>Signature:</b>  	<b>Signature:</b> <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>  
<b>Date:</b> 15/04/2024	<b>Date:</b> 24/05/2024



**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b>		
<b>Criterion 1.1:</b> 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	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p> <p>Based on the Estate Quality Management System; Sub-Section 5.5 Management Responsibility; Appendix 5.5.3.2 Procedure for External Communication; Version 1; Issue date: 1/1/2008, documents specified for mill and all estates within SOU 4 Certification Unit made available as per sample as following:</p> <ul style="list-style-type: none"> <li>- Land titles/user rights</li> <li>- Occupational health and safety plans</li> <li>- Plans and impact assessments relating to environmental and social impacts</li> <li>- HCV documentation</li> <li>- Pollution prevention and reduction plans</li> <li>- Details of complaints and grievances</li> <li>- Continuous improvement plans</li> <li>- Public summary of certification assessment report</li> <li>- Group Sustainability Policy</li> <li>- Record of CSR programs and contributions to local communities</li> </ul> <p>All operating units have individual documents and records to demonstrate compliance to this indicator.</p> <p>Other publicly available documents such as policies, company statement and annual reports were made available in the website link as following:</p>	Complied

		<p><a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a>.</p> <p>For CSR related activities, information relating to social program on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes. The events are published in the Yayasan Sime Darby website, <a href="http://www.yayasansimedarby.com/">http://www.yayasansimedarby.com/</a>.</p>	
<p>1.1.2</p>	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>As a group of company, Sime Darby Plantation Berhad (SDPB) established communication to continue to use the internet to disseminate public information relating to sustainability policies and statements via website address at <a href="https://simedarbyplantation.com/sustainability/reports-policies-and-statements/">https://simedarbyplantation.com/sustainability/reports-policies-and-statements/</a>.</p> <p>SOU 4 provided information in appropriate languages and accessible to relevant stakeholders upon request and during stakeholder consultation meetings.</p> <p>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information provided in appropriate languages and accessible to them.</p> <p>The latest meeting with External Stakeholders was conducted on 30/05/2023 at Flemington Estate Hall. Managements from all operating units within SOU 4 combined to organize the meeting that was attended by local community representatives among neighboring resident area, schools, mosque, temple, vendors and local authorities. The minutes of meeting records indicated that most of feedback from stakeholders during previous meeting have been addressed and updated to relevant stakeholders.</p> <p>Stakeholder bulletin (complaint and grievance procedure, fire prevention and RSPO requirements) and social dialogue</p>	<p>Complied</p>

		<p>reinforcement were discussed in the meeting with internal stakeholders. Information (in bi-lingual English and Malay) can be seen in the strategic area within estate and mill compound</p>	
<p>1.1.3</p>	<p><b>(C)</b> Records of requests for information and responses are maintained.          - Critical (Major) compliance -</p>	<p>SOU 4 maintained records of requests for information and responses Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The operating units maintain records of all requests and responses.</p> <p>The annual face-to-face session with external stakeholders was carried out on 30/05/2023 for SOU 4.</p> <p>Other than information related to RSPO implementation by SOU 4, communications of information included issues as per samples sighted as following:</p> <ul style="list-style-type: none"> <li>- Flemington Estate: As per letter by SJKT Ladang New Coconut; Date: 17/1/2023</li> <li>- Flemington Estate: As per letter of invitation for Social Dialogue; Date: 1/8/2023; for Social Dialogue to be conducted on 17/8/2023 to 13 workers representative consist of 4 Malaysia, 2 Bangladesh, 2 Nepal, 2 Indian &amp; 3 Indonesia</li> <li>- Sungai Samak Estate: As per sample letter of request to allow parents of SMK Ulu Bernam students to attend PIBG Meeting dated on 14/6/2023</li> <li>- Sungai Samak Estate: Request for permission to use estate roads for Cross Country run event by SJKT Ladang Sungai Samak; Date: 13/4/2023</li> </ul> <p>Sungai Samak Estate: Request by Sungai Samak Estate AP staff to occupy vacant workers quarters house dated June 2023 approved by management. All requests found to be responded within short time by respective recipients.</p>	<p>Complied</p>

<p>1.1.4</p>	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Consultation and communication procedure documented as the Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 for handling communication regarding social issues. Additionally, there's Mill Quality Management System dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>Procedures were briefed to external stakeholders during the consultation meeting and to all workers during workers meeting and assembly sessions from time to time.</p> <p>Flemington POM Procedure as per Flowchart for External Communication. Sample communication as per records of Communication and Complain Logbook by Stakeholder and Workers. Among external communication records sighted as per samples as following:</p> <ul style="list-style-type: none"> <li>- Flemington Estate: Engagement with Stakeholder SJKT Ladang New Coconut; Date: 17/1/2023</li> <li>- Flemington Estate: Meeting with Stakeholders; Date: 30/5/2023; Venue; Flemington Estate Club House</li> <li>- Flemington Estate: Employee Welfare Committee Meeting # 2/2023; Date: 14/6/2023</li> <li>- Flemington Estate: As per Letter of invitation to Stakeholder Meeting dated 20/5/2023 for meeting on 30/5/2023 selected from Stakeholders List as at March 2022</li> <li>- Sabak Bernam Estate: Stakeholder consultation meeting date: 25/5/2023; Venue: Sabak Bernam Estate Meeting Room</li> <li>- Sungai Samak Estate: Meeting with Stakeholders; Date: 26/6/2023; Venue; Sungai Samak Estate Meeting Room</li> </ul>	<p>Complied</p>
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		- Bagan Datoh Estate: Meeting with Stakeholders; Date: 29/05/2023	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	The latest Stakeholders Lists for all operating units within SOU 4 sighted available as updated in January 2023. Information of stakeholders' details available included person in charge, address, e-mail and contact number for various stakeholders' category among internal and external stakeholders including local communities, authorities, vendors and neighbours etc. Current list of contact and details of stakeholders and their nominated representatives as per register of stakeholder and letter of appointment as Official PIC on Social Matters as following:  - Flemington POM List of Stakeholder 2023; Update: 1/1/2023. Official PIC: Mr. Mxxx (Asst. Manager); Letter date: 1/1/2023 - Flemington Estate List of Stakeholder 2023; Update: 1/1/2023. Official PIC: Mr. Kxxx (Asst. Manager); Letter date: 1/2/2022 - Sungai Samak Estate List of Stakeholder 2023; Update: 1/1/2023. Official PIC: Mr. Rxxx (Asst. Manager); Letter date: 1/1/2023	Complied
<b>Criterion 1.2:</b> 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 -	SDPB established Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The code established in Bahasa Malaysia and English.  SDPB's Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC).	Complied

		<p>Besides, policies were briefed to external stakeholders during the stakeholder meeting conducted on 30/05/2023 at SOU level and through ethical code of conduct and vendor integrity pledge signed by vendor prior to contract work agreement as per latest SDPB Vendor Code of Business Conduct (VCOBC) February 2023 as per sample as following:</p> <ul style="list-style-type: none"> <li>- #Hxxx (Sungai Samak Estate Vendor/Supplier); Date: 1/4/2023</li> <li>- #Sxxx (Bagan Datoh Estate Vendor/Supplier); Date: 15/6/2023</li> <li>- #Axxx (Sabak Bernam Estate Transporter); Date: 1/7/2023</li> </ul>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>SDPB established Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The code established in Bahasa Malaysia and English.</p> <p>SDPB's Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 also includes the clause 'promoting good governance and transparency: abiding by the Group Policies &amp; Authorities (GPA) and the Code of Business Conduct (COBC).</p> <p>Besides, policies were briefed to external stakeholders during the stakeholder meeting conducted on 30/05/2023 at SOU level. A system is in place to monitor compliance and the implementation through internal audit as following:</p> <ul style="list-style-type: none"> <li>- Flemington POM; Date: 12/06/2023</li> <li>- Began Datoh Estate; Date: 13/06/2023</li> <li>- Flemington Estate; Date: 14/06/2023</li> <li>- Sungai Samak Estate; Date: 15/6/2022</li> </ul>	Complied

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		<p>Additionally, SOU 4 conducted assessment for all contractors in each operating units as per sample Contractors' Workers Assessment Report of Sabak Bernam Estate as following:</p> <ul style="list-style-type: none"> <li>- Contractors: #Axxx</li> <li>- Assessment month: April 2023; Assessment report date: 15/4/2023</li> <li>- Assessment scope: Employment Contract/Work Agreement, Payslip, Wages Calculation, SOCSO &amp; EPF Contribution</li> </ul> <p>The assessment was conducted by Site Safety &amp; Sustainability Officer (SSSO) of SOU 4 and Reviewed by Regional Sustainability and Quality Management (RSQM) personnel.</p>	
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p><b>(C)</b> The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>SDPB SOU 04 Flemington POM Certification Unit continues to comply with all verified legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and HQ. The sampled mill and estates had obtained and renewed license and permits as required by the law. Among others the licenses/permit verified were:</p> <p><u>Flemington Estate:</u></p> <ol style="list-style-type: none"> <li>1. MPOB License #525193002000 valid until to 30/11/2023</li> <li>2. Air Receiver #PMT103618 valid until 12/07/2024</li> <li>3. Diesel Permit #KPDNPRKCTIN.600-2/26/84 valid until 29/10/2025</li> <li>4. Perakuan Timbang Dan Sukat, #221050927, dated 27/09/2022</li> </ol> <p><u>Bagan Datoh Estate:</u></p>	Complied

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		<ol style="list-style-type: none"> <li>1. MPOB License #525521002000 valid until to 31/12/2023</li> <li>2. Air Receiver #PKPMT3646 valid until 31/10/2023</li> <li>3. Diesel Permit #KPDNPRKCTIN.600-2/26/97 valid until 04/11/2025</li> <li>4. Perakuan Timbang Dan Sukat, #B841554871, dated 26/01/2023</li> </ol> <p><u>Sungai Samak Estate:</u></p> <ol style="list-style-type: none"> <li>1. MPOB License #526340002000 valid until to 31/01/2024</li> <li>2. Air Receiver #PKPMT3426 valid until 19/05/2024</li> <li>3. Diesel Permit #KPDNHEP.TI.600-4/3/55 valid until 04/11/2025</li> <li>4. Perakuan Timbang Dan Sukat, #B136223888, dated 04/07/2023</li> </ol> <p><u>Sabak Bernam Estate:</u></p> <ol style="list-style-type: none"> <li>1. MPOB License #545859002000 valid until to 31/01/2024</li> <li>2. Air Receiver #SLPMT4704 valid until 16/06/2024</li> <li>3. Diesel Permit #SL/KSL/07/19/SK valid until 10/01/2024</li> <li>4. Perakuan Timbang Dan Sukat, #B235262287, dated 04/07/2023</li> </ol> <p><u>Flemington Palm Oil Mill:</u></p> <ol style="list-style-type: none"> <li>1. MPOB Licence #529874004000 valid until 31/05/2024</li> <li>2. Jadual Pematuhan DOE Licence #004234 with reference file JAS.ATI.600-3/1/104 valid until 30/06/2024</li> <li>3. Competence person CePSWaM #CePSWaM/2216004 to Assistant Engineer NRIC 8907X970201-xx-xxxx valid until 28/07/2023. Field Training Report (FTR) submitted on 02/06/2023, however, yet to receive any reply from Department of Environment (DOE)</li> </ol>	
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		<p>4. Competence person CePPOME #CePPOME/2318871 to Assistant Engineer NRIC 900612-xx-xxxx, valid until 16/01/2024</p> <p>5. Diesel Permit #KPDNPRKCTIN.600-2/26/84 valid until 29/10/2025</p> <p>6. Private Installation License – Suruhanjaya Tenaga, Serial No: 56894, License No: 2022/02268, valid until 29/10/2023</p> <p>7. Certificate Of Fitness – Monorail Chain Hoist – PMA-PK/2390472, valid until 12/06/2024</p> <p>8. Certificate Of Fitness – Vertical Air Receiver – PMT-PK/2390479, valid until 12/06/2024</p> <p>9. Certificate Of Fitness – Thermal Deaerator – PMT-PK/2390480, valid until 12/06/2024</p> <p>10. Certificate Of Fitness – Sterilizer – PMT-PK/2390475, valid until 12/06/2024</p>	
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>SDPB SOU 04 Flemington POM Certification Units has ensured legal compliance is in place. Refer Legal Other Requirement Register (LORR) Summary of Compliance updated January 2023. Refer Appointment letter to person in charge dated January 2023 to Assistant Manager Mill and Estate, that stated on monitor LORR and legal requirements. The system purposely to track changes to the laws and regulations. Among the latest updated laws were:</p> <ul style="list-style-type: none"> <li>• Minimum wages order 2022</li> <li>• Employees’ Social Security (Amendment) Act 2022</li> <li>• Employment Insurance System (EIS) (Amendment) Act 2022</li> <li>• Employment (Amendment) Act 2022</li> </ul>	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p>	<p>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 4 estates, during the</p>	Complied

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	<p>- Minor compliance -</p>	<p>field inspection confirmed that they were clearly marked and maintained.</p> <table border="1" data-bbox="1153 438 1926 981"> <thead> <tr> <th></th> <th>Estate</th> <th>Field</th> <th>Neighbouring</th> <th>Field</th> <th>Neighbouring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>S Samak</td> <td>P15</td> <td>Smallholder</td> <td>P16A</td> <td>Taipng Estate</td> </tr> <tr> <td>2</td> <td>S Samak</td> <td>P14C</td> <td>Ulu Bernam UP</td> <td>-</td> <td>-</td> </tr> <tr> <td>3</td> <td>S Bernam</td> <td>P20A</td> <td>Jalan Suhaimi</td> <td>P20E</td> <td>Kg Batu Sepintas</td> </tr> <tr> <td>4</td> <td>S Bernam</td> <td>P13A</td> <td>DID Reserve</td> <td>P20E</td> <td>Chinese Cemetery</td> </tr> <tr> <td>5</td> <td>Flemington</td> <td>P08A</td> <td>Forest Reserve</td> <td>P08C</td> <td>Sg Bernam</td> </tr> <tr> <td>6</td> <td>Flemington</td> <td>P15T</td> <td>Jenderata UP</td> <td>P15</td> <td>Sg Perak</td> </tr> <tr> <td>7</td> <td>B Datoh</td> <td>P95M</td> <td>Reserve DID</td> <td>P15A</td> <td>Smallholder</td> </tr> <tr> <td>8</td> <td>B Datoh</td> <td>P98BD</td> <td>Sg Pergam</td> <td>P15E</td> <td>Sek Keb B Datuk</td> </tr> </tbody> </table>		Estate	Field	Neighbouring	Field	Neighbouring	1	S Samak	P15	Smallholder	P16A	Taipng Estate	2	S Samak	P14C	Ulu Bernam UP	-	-	3	S Bernam	P20A	Jalan Suhaimi	P20E	Kg Batu Sepintas	4	S Bernam	P13A	DID Reserve	P20E	Chinese Cemetery	5	Flemington	P08A	Forest Reserve	P08C	Sg Bernam	6	Flemington	P15T	Jenderata UP	P15	Sg Perak	7	B Datoh	P95M	Reserve DID	P15A	Smallholder	8	B Datoh	P98BD	Sg Pergam	P15E	Sek Keb B Datuk	
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<p><b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>																																																									
<p>2.2.1</p>	<p>A list of contracted parties is maintained.                      - Minor compliance -</p>	<p>A list of contracted parties maintained by all operating units within SOU 04 in their respective List of Stakeholders Information FY 2023 which consists of stakeholders among Local Community Heads, Neighbours, Local Authorities, Vendors (Contractors &amp; Suppliers).</p>	<p>Complied</p>																																																						
<p>2.2.2</p>	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.                      Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p>	<p>Contracts contain specific clauses on meeting applicable legal requirements available in the Vendor Integrity Pledge records for sampled contractors as per below:  <u>Flemington Estate</u></p>	<p>Complied</p>																																																						

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<p>- Minor compliance -</p>	<p>a. Contractor: FXXX TRXXXXXXXXXXXX Sdn Bhd, FFB Transportation Service for SDPB’s estates; Dated: 22/02/2022, valid for 2 years from 01/01/2022 to 31/12/2023.</p> <p>The contractor evaluation was conducted monthly, sighted the record of contractor KPI evaluation for the month of January 2023 until July 2023 for the contractor.</p> <p><u>Bagan Datoh Estate</u></p> <p>a. Contractor: FXXX TRXXXXXXXXXXXX Sdn Bhd, FFB Transportation Service for SDPB’s estates; Dated: 22/02/2022, valid for 2 years from 01/01/2022 to 31/12/2023.</p> <p>b. Contractor: M. RAXXX COXXXXXXXX, for heavy machinery work for SDPB Bagan Datoh Estate; Dated: 01/03/2023, valid for a year from 01/03/2023 to 01/04/2024.</p> <p>The contractor evaluation was conducted monthly, sighted the record of contractor KPI evaluation for the month of January 2023 until July 2023 for both contractors.</p> <p><u>Sungai Samak Estate</u></p> <p>a. Contractor: FXXX TRXXXXXXXXXXXX Sdn Bhd, FFB Transportation Service for SDPB’s estates; Dated: 22/02/2023, valid for a year from 01/03/2023 to 01/03/2024.</p> <p>b. Contractor: PXXXXXXXXX AX EXXXXXXXXX for heavy machinery work for SDPB Sungai Samak Estate; Dated: 01/01/2023, valid for a year from until 31/12/2023.</p> <p>The contractor evaluation was conducted monthly, sighted the record of contractor KPI evaluation for the month of January 2023 until July 2023 for both contractors.</p>
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		<p><u>Sabak Bernam Estate</u></p> <p>a. Contractor: AXXXX MXXX AGXXXXXXXX Sdn Bhd, FFB Transportation Service for SDPB’s estates; Dated: 22/02/2022, valid for two years from 01/01/2022 to 31/12/2023.</p> <p>The contractor evaluation was conducted monthly, sighted the record of contractor KPI evaluation for the month of January 2023 until July 2023 for both contractors.</p> <p><u>Recruitment Agencies</u></p> <p>SDPB has established the Migrant Workers Responsible Recruitment Procedure dated 20/08/2021, with due diligence process is mentioned in clause 3(b)</p> <p>a. Contractor: Letter of Award (LOA) PX WXXX KXXXXXX for recruitment agencies for SDPB’s estates; Dated: 13/07/2022, valid until 12/07/2024</p> <p>Verified that the management of SDPB has conducted the due diligence process for the recruitment agency dated 04/04/2023.</p> <p>SDPB has conducted the training to the recruitment agencies on 01-02/04/2023.</p> <p>Evidence of due diligence of all contracted third parties recorded under checklist of contractor and vendor for 2023. The certification unit conducted regular compliance inspection on the contractors. Based on the evaluation report was conducted each month on the contractors of for all sampled Estate, it was stated that there were 100% compliance on the contractors’ due diligence.</p>	
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2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>The presence of clauses disallowing child, forced, and trafficked labor can be noted within the contract documents and Vendor Integrity Pledge (VIP) records referenced in indicator 2.2.2. Additionally, the employment of young workers by contractors and vendors is not observed.</p>	Complied
<p><b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Within the certification scope, the mill is supported by four estates that provide Fresh Fruit Bunches (FFB). These estates are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate, and Sabak Bernam Estate. The mill has systematically gathered evidence for each of its suppliers, including details about the geo-location of FFB origins, proofs of land ownership status or rightful land use claims, documented evidence of land use validity by growers or smallholders, as well as one or more supplementary documents supporting these claims, all accompanied by valid MPOB licenses.</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>The mill received FFB from supply base estate within the SOU 04 and FFB diversion from other certified SOU such as SOU 05 Seri Intan. The FFB suppliers were listed in the Flemington Palm Oil Mill FFB Supplier List</p>	Complied
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>			
<p><b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The 4 estates continued to commit to long term economic and financial viability. The annual budgets for 2023 to 2027 were sighted. The budget covers activities for upkeep, cultivation, harvesting &amp; evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton &amp; per ha and CAPEX - capital</p>	Complied

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expenditure mainly for buildings, furniture and others asset related expenses. The estates adopted the following format for the annual budget.

Year	2023	2024	2025	2026	2027
Mature Ha	x	x	x	x	x
Immature Ha	x	x	x	x	x
Total Ha	x	x	x	x	x
S Samak FFB /mt	53251	57336	58763	56386	54468
S Samak YPH	20.10	22.00	23.08	22.87	23.32
B Datoh FFB / mt	65670	79862	83314	80994	83144
B Datoh YPH	19.29	22.34	23.90	24.50	25.80
S Bernam FFB /mt	41767	54561	62506	65673	67080
S Bernam YPH	20.30	23.70	26.55	28.00	28.50
F/mton FFB /mt	35686	37281	38894	39706	41391
F/mton YPH	23.80	23.02	25.12	26.21	27.32
RM/mt FFB	x	x	x	x	x
RM/ha	x	x	x	x	x

Similarly, the mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains;

1. FFB yield & CPO production forecast
2. Extraction Ratios – OER / KER,

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		<p>3. Cost of production          - administration / labour overhead          - processing cost labour, maintenance, consumables          - depreciation and head office charges</p> <p>4. EVIT running accounts</p> <p>5. CAPEX - capital expenditure.</p> <table border="1" data-bbox="1178 630 1888 1125"> <thead> <tr> <th>Year</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>FFB processed</td> <td>204823</td> <td>231692</td> <td>243799</td> <td>245958</td> <td>251434</td> </tr> <tr> <td>OER</td> <td>20.30</td> <td>20.30</td> <td>20.59</td> <td>21.12</td> <td>21.17</td> </tr> <tr> <td>KER</td> <td>4.80</td> <td>4.80</td> <td>4.85</td> <td>4.85</td> <td>4.90</td> </tr> <tr> <td>Administration</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Processing cost</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Depreciation</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>HQ charges</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/mt FFB</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/mt CPO</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table>	Year	2023	2024	2025	2026	2027	FFB processed	204823	231692	243799	245958	251434	OER	20.30	20.30	20.59	21.12	21.17	KER	4.80	4.80	4.85	4.85	4.90	Administration	x	x	x	x	x	Processing cost	x	x	x	x	x	Depreciation	x	x	x	x	x	HQ charges	x	x	x	x	x	RM/mt FFB	x	x	x	x	x	RM/mt CPO	x	x	x	x	x	
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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>	<p>The long-range replanting programs (LRRP) until 2028 were sighted on all 4 estates. The program was reviewed yearly and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares is as follows:</p> <table border="1" data-bbox="1256 1294 1809 1391"> <thead> <tr> <th></th> <th>Year</th> <th>SSE</th> <th>BDE</th> <th>FE</th> <th>SBE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2024</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table>		Year	SSE	BDE	FE	SBE	1	2024	0.00	0.00	0.00	0.00	Complied																																																
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			2	2025	87.31	152.39	70.81	0.00																															
			3	2026	148.70	199.81	33.39	0.00																															
			4	2027	129.63	150.51	0.00	0.00																															
			5	2028	217.00	0.00	0.00	0.00																															
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>The Management Review was held as follows chaired by the respective Managers:</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>Attendee</th> <th>Date</th> <th>Attendee</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SSE</td> <td>23/06/23</td> <td>14</td> <td>05/08/22</td> <td>14</td> </tr> <tr> <td>2</td> <td>BDE</td> <td>21/06/23</td> <td>18</td> <td>29/07/22</td> <td>18</td> </tr> <tr> <td>3</td> <td>FLE</td> <td>19/06/23</td> <td>5</td> <td>09/08/22</td> <td>11</td> </tr> <tr> <td>4</td> <td>SBE</td> <td>25/07/23</td> <td>13</td> <td>04/08/22</td> <td>15</td> </tr> <tr> <td>5</td> <td>FPOM</td> <td>03/07/23</td> <td>10</td> <td>01/08/22</td> <td>7</td> </tr> </tbody> </table> <p>The agenda discussed among others includes the following;</p> <ol style="list-style-type: none"> <li>1. Results of internal audits</li> <li>2. Customer feedback</li> <li>3. Process performance and product conformity</li> <li>4. Status of preventive &amp; corrective actions</li> <li>5. Follow up action from management review</li> <li>6. Changes that could affect the management system</li> <li>7. Recommendation for improvement</li> </ol>		Estate	Date	Attendee	Date	Attendee	1	SSE	23/06/23	14	05/08/22	14	2	BDE	21/06/23	18	29/07/22	18	3	FLE	19/06/23	5	09/08/22	11	4	SBE	25/07/23	13	04/08/22	15	5	FPOM	03/07/23	10	01/08/22	7	Complied
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		Minutes of meeting for all 4 estates and mill were sighted and verified. No major issues were highlighted during the meeting. Main focus is on the forthcoming external RSPO audit in Aug 2023.									
<b>Criterion 3.2:</b> 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	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>This has been established in the Continuous Improvement Plan 2023 updated in Jan 2023 respectively for both the Mill and Estate. This compilation was made with subject to the consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments maintained available. Among the documents were:</p> <ul style="list-style-type: none"> <li>(a) Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers.</li> <li>(b) Environmental Improvement Plan 2023</li> <li>(c) Pollution Prevention Plan 2023</li> <li>(d) Water Management Plan. 2023</li> <li>(e) Waste Management Plan 2023</li> </ul> <p>The Continuous Management Plan 2023 for the estate/mill operations among others include the following initiatives;</p> <table border="1" data-bbox="1160 1166 1912 1361"> <thead> <tr> <th>Projects</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Estates</td> <td></td> </tr> <tr> <td>SSE - Welfare</td> <td>Surau upgrading</td> </tr> <tr> <td>SSE - Operations</td> <td>Terrace raker machine</td> </tr> </tbody> </table>	Projects	Details	Estates		SSE - Welfare	Surau upgrading	SSE - Operations	Terrace raker machine	Complied
Projects	Details										
Estates											
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		SSE - Operations	5 units MB - for FFB collection	
		SSE - Operations	Bund heightening	
		SSE - Welfare	Ceiling fan 142 units workers Quarters	
		SBE - Operations	Passenger vehicle	
		SBE - Welfare	6 units workers Quarters	
		SBE - Welfare	Fencing at workers Quarters	
		SBE - Welfare	Tarmac road at quarters complex	
		SBE - Welfare	Upgrading workers Quarters - tiling	
		BDE - Welfare	Water pipe replacement Bagan Div.	
		BDE - Welfare	Car porch Workers Quarters	
		BDE - Welfare	Bathroom upgrading workers Quarters	
		BDE - Welfare	O/H water tank workers Quarters	
		BDE - Operations	MTG c/w grabber 4 units	
		BDE - Welfare	Perimeter drain upgrading	
		FLE - Welfare	Water pipeline workers houses	
		FLE - Welfare	Upgrading houses 24 units 2 years	
		FLE - Welfare	New roofing houses 5 years plan	
		FLE - Operation	2 New bridges for FFB evacuation	
		FLE - Operation	New fertilizer pallet 300 units	
		FLE - Welfare	Streetlights 1.5 km 30 units	

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		FLE - Operation	New bins 40 units in 3 years
		Flemington POM	Details
	1	Operations 2023	1 unit 40mt Boiler
	2	Operations 2023	Steam Turbine
	3	Operations 2023	SORS system for technical grade oil
	4	ETP Security 2023	2 units new sterilizers
	5	Operation - 2023	New cages 16 units
	6	Welfare - 2023	Premix road mill housing
	7	Security - 2023	Fencing at ETP area
	8	Security - 2023	Fencing Workers quarters
	9	Operation - 2023	New Scheduled waste building
	10	Operation 2023	EFB Conveyor to ex Compost storage
	11	Operation 2023	Omega Project - machinery/facility
		<p>Continuous improvements are established covering the social, environmental and safety impacts in the operating units. The action plan established focusing on:</p> <ul style="list-style-type: none"> <li>a) Communication and whistle blower</li> <li>b) Dumping rubbish outside estate landfill.</li> <li>c) Increase awareness on safety and health</li> </ul>	

		d)resurface road and office compound area with milling waste To maintain 5S work standard in all operation	
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><b>PROCEDURAL NOTE:</b>  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) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>SOU 4 competed their RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. The input data was found to be accurate based on the following records verification:</p> <ul style="list-style-type: none"> <li>• SAP accounting system</li> <li>• Land titles</li> <li>• Complaints &amp; grievance records</li> <li>• Dept. of Safety &amp; Health’s JKPP8 form</li> </ul>	Complied
<b>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</b>			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) for the estate and mill has been established. Sime Darby SOP issued dated 02/01/2008 and Agricultural Reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU 04 as a guidance document to conduct estate operation. The estate also holds the Safety Work Procedure. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation etc.</p> <p>Palm Oil Mill holds two SOPs: Sustainable Plantation Management System (SPMS) version 1 dated 1/11/2008 and Mill Quality Management System version 1 dated 1/11/2008 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, Sime Darby has issued Health, Safety and Environment (HSE)</p>	Complied

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		<p>Management System and Standard Operating Procedures. Sime Darby continuously updated the SOP established. Among the updated SOP FY 2023 as follows:</p> <ol style="list-style-type: none"> <li>1. UM HSE Management System Manual, UM/HSE/MS/01</li> <li>2. First Aid in Workplace Procedure, UM/HSE/OCP/01</li> <li>3. Safety Harvesting Procedure, UM/HSE/OCP/02</li> <li>4. Personal Protective Equipment Procedure, UM/HSE/OCP/03</li> <li>5. Chemical Safety Management Procedure, UM/HSE/OCP/04</li> <li>6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05</li> <li>7. OSH Risk Management Procedure, UM/HSE/SE/01</li> </ol>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.            - Minor Compliance -</p>	<p>A mechanism on checking the consistency of estate and mill implementation of their procedures were in place. Among the mechanism such as Regional CEO/GM Visit, Performance Monitoring Visit, SORA/SCRA visit, Agronomist visit and Internal Audit.</p> <p>SOU 04 internal Audit was conducted on 12-16/06/2023</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.            - Minor Compliance -</p>	<p>The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit. Reviewed the monitoring records as follows:</p> <p><u>Flemington POM</u></p> <ol style="list-style-type: none"> <li>1. Internal Audit Report: 12/06/2023</li> <li>2. Structured Oil Recovery Assessment: 08-12/05/2023</li> <li>3. HSE Fly-by &amp; Validation (HSE UM &amp; RSQM Checklist and Reporting: 16/02/2023</li> </ol> <p><u>Flemington Estate</u></p> <ol style="list-style-type: none"> <li>1. Internal Audit Report dated 14/06/2023</li> <li>2. PPE Checklist inspection dated 02/08/2023</li> </ol>	Non-compliance

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		<p>3. Contractor Due Diligence Monitoring Checklist 4. Work Site Inspection dated 23/06/2023</p> <p><u>Bagan Datoh Estate</u></p> <p>1. Internal Audit Report dated 13/06/2023 2. PPE Checklist inspection dated 02/07/2023 3. Contractor Due Diligence Monitoring Checklist 4. Work Site Inspection dated 01/06/2023.</p> <p><u>Sungai Samak Estate</u></p> <p>1. Internal Audit Report dated 15/06/2023 2. PPE Checklist inspection dated 08/08/2023 3. Contractor Due Diligence Monitoring Checklist 4. Work Site Inspection dated 01/06/2023</p> <p><u>Sabak Bernam Estate</u></p> <p>1. Internal Audit Report dated 16/06/2023 2. PPE Checklist dated 18/07/2023 3. Contractor Due Diligence Monitoring Checklist 4. Work Site Inspection dated 17/05/2023.</p> <p>Verification of procedure been made on:</p> <p>1. Occupational Safety &amp; Health Procedure – Transportation System and Machinery Procedure (Doc No: SD/SDP/PSQM(ESH)/201/0517, Date: 01/07/2012) Clause 7.1.3.3 Prevention and Control which mentioned on control on vehicle should be used and maintained in accordance with applicable laws and recommendation and appropriate be equipped with safety devices</p>	
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		<p>2. Permit To Work Procedure (Doc No: UM/HSE/OCP/13, Date: 10/01/2023), and Permit to Work specifically on confined spaces which is stated the liability at any time to have an atmosphere which contains potentially harmful levels of contaminants, have an oxygen deficiency or excess or cause engulfment and could have restricted means for entry and exit.</p> <p>3. Personal Protective Equipment (PPE) Procedure (Doc No: UM/HSE/OCP/03, Effective date: 09/03/2021) Clause 5.5 PPE Maintenance, stated that the PPE must be inspected regularly against any condition that may impact the PPE performance.</p> <p>Further checking on the checklist at Flemington Palm Oil Mill for both the Vehicle Checklist and PTW checklist found that the record stated in the checklist does not correlate with requirement stated in the procedure.</p> <p>At Sungai Samak Estate, the PPE checking record was not sufficiently maintained against the condition that may impact the PPE Performance. Thus, the Minor NC is raised.</p>	
<p><b>Criterion 3.4:</b> 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.</p>			
3.4.1	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting within all estates within SOU 4. For existing operations, SOU 04 has a separate Social Impact Assessment (SIA) and Environmental Impact Assessment reports. The latest SIA was documented as Social Impact Assessment (SIA) Report SIA SOU 4 Flemington; Assessment date: 27/6/2016 – 1/7/2016. It mentioned the objectives, category, action, frequency, person in charge and monitoring period.</p> <p>Among others as summarised below:</p>	Complied

		<p>a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor's workers and to maintain housing and facilities provided to workers). based on inputs received from external stakeholders during stakeholder meetings, union meetings, JCC meetings, and Gender Committee</p> <p>b) To contribute to local communities' development based on inputs received from external stakeholders during stakeholder meetings, union meetings, JCC meetings, and Gender Committee meetings.</p> <p>c) Each operating units established and reviewed their Social Management Action Plan with participation of both internal and external stakeholders during consultation meetings. Sample plan as following:</p> <ul style="list-style-type: none"> <li>- Sabak Bernam Estate: SJKT Ladang Sabak Bernam request of machine to flatten land within school area; Completion target: End August 2023</li> <li>- Sungai Samak Estate: Inspection of vehicles used by workers within estate; Completion target: Early October 2023</li> <li>- Bagan Datoh Estate: Change of daily working hour from 8 hours to 7.5 hours to comply with revised Labour Act 1955 (Amendment) effective from 1/1/2023</li> <li>- Flemington POM: Housing - Installation of fences surrounding workers housing area to prevent livestock intrusion, installation of ceiling fan, repair of perimeter drain</li> <li>- Flemington Estate: Request of recycle bin for school (SJKT Ladang Flemington); completed on 25/7/2022</li> </ul>	
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- Flemington Estate: Request to desilting drains at boundary at Kampung Sungai Timah (Teluk Buluh Division); completed on 1/8/2022

The aspect and impact analysis for all the mill/estate operations are documented and revised annually recent being Jan 2023. In the comprehensive report, the study of aspect and impact are aimed to;

- a) Plan to avoid negative impact and to promote positive impacts.
- b) Reduction disposal of waste taking into consideration of social responsibilities.
- c) Plan to reduce pollution and release of GHG
- d) Development and implementations.

The aspect and impact covered the following activities/operations among others;

Estate			
	Activities		Activities
1	Poisoning of VOPs/ woodies	7	Vehicle maintenance by contractors
2	Circle spraying	8	EFB application
3	Management of empty containers	9	Fertilizer storage /application
4	Rat baiting	10	Grass slashing
5	Diesel Reception	11	Chemicals storage
6	Triple rinsing	12	Grading of FFB
Flemington Palm Oil Mill			
	Activities		Activities
1	Effluent treatment	7	EFB storage
2	Engine room operations	8	Laboratory
3	Boiler operations	9	Workshop operations

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		4	CPO storage	10	Sterilization																									
		5	Diesel Reception/storage	11	Chemicals storage																									
		6	Triple rinsing	12	Scheduled wastes storage																									
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The Social/Environmental Action Plan available for each units were available having information i.e. issues, management plan, PIC and time frame. The input are gathered from the meeting minutes</p> <p>a) Gender Committee, NUPW, b) Safety Meeting, c) Complaint &amp; Request from internal &amp; external stakeholders and muster briefing). d) Stakeholders meeting</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>OU</th> <th>Review date</th> <th>Updates</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>FPOM</td> <td>04/01/2023</td> <td>No changes</td> </tr> <tr> <td>2</td> <td>Bagan Datoh</td> <td>27/07/2023</td> <td>No changes</td> </tr> <tr> <td>3</td> <td>Flemington</td> <td>27/07/2023</td> <td>No changes</td> </tr> <tr> <td>4</td> <td>S Bernam</td> <td>16/01/2023</td> <td>No changes</td> </tr> <tr> <td>5</td> <td>Sg Samak</td> <td>10/03/2023</td> <td>No changes</td> </tr> </tbody> </table>					OU	Review date	Updates	1	FPOM	04/01/2023	No changes	2	Bagan Datoh	27/07/2023	No changes	3	Flemington	27/07/2023	No changes	4	S Bernam	16/01/2023	No changes	5	Sg Samak	10/03/2023	No changes	Complied
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3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The Social/Environmental Action Plan available for each units were available having information i.e. issues, management plan, PIC and time frame. The inputs are gathered from the meeting minutes:</p> <p>1. Gender Committee, NUPW, 2. Safety Meeting, 3. Complaint &amp; Request from internal &amp; external stakeholders 4. and muster briefing).</p>				Complied																								

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		<p>Stakeholders meeting as shown below:</p> <table border="1" data-bbox="1272 419 1809 718"> <thead> <tr> <th></th> <th>OU</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>S Samak Estate</td> <td>28/06/23</td> <td>28/06/22</td> </tr> <tr> <td>2</td> <td>B Datoh Estate</td> <td>29/05/23</td> <td>09/08/22</td> </tr> <tr> <td>3</td> <td>Flemington Estate</td> <td>30/05/23</td> <td>09/05/22</td> </tr> <tr> <td>4</td> <td>S Bernam Estate</td> <td>25/05/23</td> <td>09/08/22</td> </tr> <tr> <td>5</td> <td>Flemington Mill</td> <td>29/05/23</td> <td>27/05/22</td> </tr> </tbody> </table> <p>As indicator 3.4.1 above, management and monitoring of plan were based on operational activities.</p>		OU	Date	Date	1	S Samak Estate	28/06/23	28/06/22	2	B Datoh Estate	29/05/23	09/08/22	3	Flemington Estate	30/05/23	09/05/22	4	S Bernam Estate	25/05/23	09/08/22	5	Flemington Mill	29/05/23	27/05/22	
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<p><b>Criterion 3.5:</b> A system for managing human resources is in place.</p>																											
<p>3.5.1</p>	<p>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 -</p>	<p>The Workers Management Unit in SDPB HQ has established Standard Operating Procedure Title: Hiring of Local Workers; Doc. # 01-12-19; Effective date: 1/12/2019; Rev. # 1 and Migrant Worker Responsible Recruitment Procedure effective 20 August 2021 to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the Workforce Management Unit and HR. The document is available to workers upon request.</p>	<p>Complied</p>																								
<p>3.5.2</p>	<p>Employment procedures are implemented, and records are maintained.                      - Minor Compliance -</p>	<p>Employment procedures are well implemented with records well maintained as per information reported in indicator 6.1.6 including records as per sample for Sabak Bernam Estate: Induction Training for New PMI (Batch 10); Date: 15/06/2023.</p>	<p>Complied</p>																								
<p><b>Criterion 3.6:</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>																											

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<p>3.6.1</p>	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB have established OSH Risk Management Procedure UM/HSE/SP/01 effective date 09 March 2021. Risk were identified and assessed in accordance to the established HIRARC an also in compliance to legal requirements as stated below.</p> <p><u>Flemington Palm Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. HIRARC was available to address all the risks and hazards associated to the operations in the estate. The sample HIRARC taken was reviewed on 27/07/2023 for water treatment plant, 31/05/2023 for boiler station and 08/06/2023 and kernel plant 21/03.2023</li> <li>2. Chemical Health Risk Assessment was conducted in the mill in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. CHRA Report Reference Number: HQ/09/ASS/00/124-2020/0026; Date of Assessment: 02/07/2020.</li> <li>3. Medical Surveillance Programme has been performed successfully for the year 2023 on 11/07/2023 for the mill workers exposed to hazardous chemicals and fumes. A total of 14 workers have been examined on 11/07/2023 and found that all are fit to work.</li> <li>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. Noise Risk Assessment (NRA) has been conducted on 06/07/2020. NRA Report (Assessor Registration Number: HQ/18/PEB/00/00021) available for verification. The recommendation stated by the assessor have been affectively addressed as verified.</li> <li>5. An audiometric testing was done on 01/08/2022. The results indicated that there were 2 workers were recommended to</li> </ol>	<p>Complied</p>
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		<p>OHD due to abnormal audiometric result. Retest was conducted on 26/10/2022 found that 1 worker having hearing impairment, and another one having suggestive of NIHL. Both cases were notified to DOSH by the OHD. The management has sent the workers for audiometric testing on 24/07/2023, however the result is yet to be available during the audit. The mill management has follow up with the vendor on the completion of report through phone call.</p> <p><u>Flemington Estate</u></p> <ol style="list-style-type: none"> <li>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Spraying, Manuring and Office Operations. Verification done on the documentations and operations indicated that all the risk controls were adhered to.</li> <li>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk Assessment Report (Ref. Number: HQ/09/ASS/00/124-2020/0022 conducted on 18/06/2020</li> <li>3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification as follows:  The medical surveillance programme for the year 2023 has been performed on 17/03/2023 at Sabak Dispensary for 18 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers are fit to work.</li> </ol>	
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		<p>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. The recommendation stated by the assessor have been affectively addressed as verified. Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 07/07/2020 by SX SXXXXX CXXXXXXXXXXXX Sdn Bhd. The assessment report was available for verification.</p> <p>There is no audiometric testing conducted as the level of noise is below the Permissible Exposure Limit (PEL) value of less than 80dB</p> <p><u>Bagan Datoh Estate</u></p> <ol style="list-style-type: none"> <li>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Spraying, Manuring and Office Operations. Verification done on the documentations and operations indicated that all the risk controls were adhered to. The HIRARC was reviewed on 01/06/2023</li> <li>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk Assessment Report (Ref. Number: HQ/09/ASS/00/124-2020/0021 conducted on 17/06/2020</li> <li>3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification as follows:</li> </ol>	
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		<p>The medical surveillance programme for the year 2022 has been performed on 21/07/2022 at Klxxxxx &amp; Surxxxxx Lxx for 35 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers are fit to work.</p> <p>The medical surveillance for the year 2023 has been conducted on 20/07/2023. The management is yet to receive the result of the medical surveillance. The management has followed up through phone call to the vendor.</p> <p>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. The recommendation stated by the assessor have been affectively addressed as verified. Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 07/07/2020 by SX SXXXXX CXXXXXXXXXXXX Sdn Bhd. The assessment report was available for verification.</p> <p>There is no audiometric testing conducted as the level of noise is below the Permissible Exposure Limit (PEL) value of less than 80dB</p> <p><u>Sungai Samak Estate</u></p> <p>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Spraying, Manuring and Office Operations. Verification done on the documentations and operations indicated that all the risk controls were adhered to. The HIRARC was reviewed on 01/06/2023</p>	
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		<p>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk Assessment Report (Ref. Number: HQ/09/ASS/00/124-2020/0023 conducted on 25/06/2020</p> <p>3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification as follows.</p> <p>The medical surveillance programme for the year 2022 has been performed on 08/12/2022 at Klinik KX TXX for 20 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers are fit to work.</p> <p>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. The recommendation stated by the assessor have been affectively addressed as verified. Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 08/07/2020 by SX SXXXXX CXXXXXXXXXXXX Sdn Bhd. The assessment report was available for verification. There is no audiometric testing conducted as the level of noise is below the Permissible Exposure Limit (PEL) value of less than 80dB. In May 2023, there was a newly purchased machine i.e., mechanical spreader for mechanized manuring activity introduced in the operation. Hence, the management has re-conducted the NRA on 13/06/2023 of which the report is yet</p>	
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		<p>to be available during the audit. The management has follow up with the assessor through phone call in order for them to plan the H&amp;S program accordingly. It was due to tight schedule of the assessor, the report was unable to be provided within one month.</p> <p><u>Sabak Bernam Estate</u></p> <ol style="list-style-type: none"> <li>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Spraying, Manuring and Office Operations. Verification done on the documentations and operations indicated that all the risk controls were adhered to. The HIRARC was reviewed on 03/02/2023</li> <li>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk Assessment Report (Ref. Number: HQ/09/ASS/00/124-2020/0024 conducted on 26/06/2020</li> <li>3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification as follows:  The medical surveillance programme for the year 2023 has been performed on 14/03/2023 at SaXXX DisXXXXXXXXX for 21 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers are fit to work.</li> <li>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the</li> </ol>	
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		<p>sampled sites. The recommendation stated by the assessor have been affectively addressed as verified. Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 08/07/2020 by SX SXXXXX CXXXXXXXXXXXX Sdn Bhd. The assessment report was available for verification.</p> <p>5. Audiometric Test was conducted for 23 operation workers which are working with the tractor, blower and workshop. The management has conducted the audiometric testing on 07/06/2023, 5 workers needed to be sent for audiometric test again before 07/09/2023.</p>	
<p>3.6.2</p>	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.          - Critical (Major) compliance -</p>	<p>Annual Health and Safety Plan available for the estate and mill are mostly implemented through Annual Training Program 2023 and monitored via inspections to address the identified health and safety risks. The emphasis is on safe work by providing,</p> <ul style="list-style-type: none"> <li>▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk.</li> <li>▪ Awareness and understanding of workplace hazards and how to identify, report, and control them.</li> <li>▪ Specialized training when their work involves unique hazards.</li> </ul> <p>Besides formal classroom training, other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"> <li>• Internal Audit conducted by the Sustainability Department.</li> <li>• Work Site Inspection (WSI) by site OSH Committee.</li> <li>• Direct involvement of supervisor and rounds by Asst Manager.</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>• Safety incidents reporting via Rapid4.</li> <li>• Health / medical surveillance.</li> <li>• Chemical exposure monitoring, and</li> <li>• Daily Monitoring Checklist such as PPE Checklist</li> </ul> <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.</p>	
<b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p><b>(C)</b> 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&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units visited has conducted training need analysis for all employee, management, and contractors. The need analysis was conducted based on the job designation and training required by the job type.</p> <p>Trainings was identified for management, employee and contractors and programmed throughout FY 2023. The training identified covers the safety and health, environmental and social aspect.</p> <p>Means implemented by SOU 04 certification units were to assess understanding of participants include:</p> <ul style="list-style-type: none"> <li>• Participants completing post-training evaluation/feedback form and give suggestions.</li> <li>• Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended.</li> </ul> <p>Random interviews with workers showed that they understood what RSPO is, the several subsidiaries' policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, etc.</p>	Complied

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<p>3.7.2</p>	<p>Records of training are maintained.          - Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p><u>Flemington Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical Handling Training - Sprayer</td> <td>04/08/2023</td> </tr> <tr> <td>First Aid Training</td> <td>21/07/2023</td> </tr> <tr> <td>HCV And Biodiversity Training</td> <td>13/06/2023</td> </tr> <tr> <td>Noise And Hearing Training</td> <td>10/06/2023</td> </tr> <tr> <td>Fire Fighting Training / Fire Drill</td> <td>09/06/2023</td> </tr> <tr> <td>Chemical And Spillage Handling Training</td> <td>18/05/2023</td> </tr> <tr> <td>Schedule Waste Training</td> <td>12/05/2023</td> </tr> <tr> <td>Sime Darby Plantation Policies, HRD, HRC, COBC Video Briefing</td> <td>03/05/2023</td> </tr> <tr> <td>Safety Training For Workshop Attendant</td> <td>28/03/2023</td> </tr> </tbody> </table> <p><u>Bagan Datoh Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Fire Extinguisher, Fire Fighting and Fire Drill Training</td> <td>02/06/2023</td> </tr> <tr> <td>Emergency Response Team Briefing</td> <td>02/06/2023</td> </tr> <tr> <td>First Aid Refresher Training</td> <td>03/06/2023</td> </tr> </tbody> </table>	Training	Date	Chemical Handling Training - Sprayer	04/08/2023	First Aid Training	21/07/2023	HCV And Biodiversity Training	13/06/2023	Noise And Hearing Training	10/06/2023	Fire Fighting Training / Fire Drill	09/06/2023	Chemical And Spillage Handling Training	18/05/2023	Schedule Waste Training	12/05/2023	Sime Darby Plantation Policies, HRD, HRC, COBC Video Briefing	03/05/2023	Safety Training For Workshop Attendant	28/03/2023	Training	Date	Fire Extinguisher, Fire Fighting and Fire Drill Training	02/06/2023	Emergency Response Team Briefing	02/06/2023	First Aid Refresher Training	03/06/2023	<p>Complied</p>
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		Tractor Driver Competency Training	08/02/2023	
		Hearing Conservation Training	20/02/2023	
		HCV Awareness Training	09/05/2023	
		HSE Golden Rule	12/01/2023	
		PPE Training	02/02/2023	
		RSPO / MSPO Training	05/04/2023	
		Workers Induction Training	03/03/2023	
		<u>Flemington Palm Oil Mill</u>		
		Training	Date	
		First Aid Training	21/07/2023	
		Hearing Conservation Training	20/02/2023	
		Policy Briefing	20/02/2023	
		PPE Training	23/04/2023	
		Chemical Management Training	14/03/2023	
		Emergency Fire Training	26/05/2023	
		RSPO MSPO Refresher Training	09/08/2023	
		<u>Sungai Samak Estate</u>		
		Training	Date	

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		First Aid Training, Fire Fighting and ERT Training	14/06/2023	
		Chemical Mixing / Handling Training	12/06/2023	
		Sexual Harassment Training	11/03/2023	
		Induction Training For New Workers	11/02/2023	
		Golden Rule Briefing	20/01/2023	
		Hearing Conservation Program	04/04/2023	
		<u>Sabak Bernam Estate</u>		
		Training	Date	
		Fire Drill Training	17/03/2023	
		ILO, RSPO Training	03/03/2023	
		Tractor Driver Training	20/02/2023	
		Safety Briefing to Workers	27/02/2023	
		Chemical Handling/ Waste/Chemical Spillage	Scheduled 12/06/2023	
		ERP And First Aid Training	13/06/2023	
		Safety, SOP, HIRARC, Golden Rule Training	18/07/2023	
		Hearing Conservation Training	03/02/2023	
		First Aid Training	02/08/2023	

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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Training conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by Regional Sustainability &amp; Quality Management (RSQM) personnel, attended Flemington Mill Manager, Assistant Mill Manager, Lab Supervisor, Lab Despatch Operator, Weighbridge Clerk and Auxiliary Police. Refer Training record dated 30/03/2023.</p> <p><u><a href="#">Extension of Scope Assessment</a></u></p> <p>For the purpose of the extension of scope, SDPB has conducted a special online training on 13/02/2024. It was conducted by personnel from the Group Sustainability Department and attended by the key personnel of the certification unit such as Assistant Managers, QA, weighbridge clerks and admin clerks. Record of training was made available for verification. Interview with the relevant personnel including those from the Global Trade and Marketing (GTM) Department has also showed the good understanding with regards to the extension of scope. The GTM is the unit responsible for organising delivery allocations and the sales announcements in the RSPO PalmTrace.</p>	Complied
<p><b>Criterion 3.8:</b> Supply chain requirement for mills (note: All supply chain requirements are considered as <b>Critical (C)</b>. However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>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&amp;C), or against the Group Certification scheme.</p> <p>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</p>	<p>Refer Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section Glossary stated the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user uniquely identifiable to a single RSPO certified supply base. Refer document no. SD/SDP/GSD/SCCS/0522/01. FFB were obtained from all Sime Darby certified estates only. There was no</p>	Complied

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	RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	third party's crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill.					
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Flemington POM is under Identity Preserved module. Thus, this indicator is not applicable.</p> <p><a href="#">Extension of Scope Assessment</a></p> <p>The mill does not have any intention to accept and process any non-certified FFB, CPO or PK. All the FFB are supplied by its own certified supply base or other Sime Darby's certified estates on ad hoc basis. Thus, the palm oil content of its products is 100% IP-certified. This extension of scope assessment is conducted so that the mill can classify and sell its IP-certified CPO or PK as MB-certified. It does not imply that the mill has the capacity to receive non-certified FFB and produce MB module CPO/PK and IP module CPO/PK separately.</p>	Not Applicable				
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date is reported in the summary in Table 7 and Table 10.	Complied				
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <table border="1" style="width: 100%;"> <tr> <td>Member name</td> <td>Flemington Oil Mill</td> </tr> <tr> <td>Palm Trace ID</td> <td>RSPO_PO1000000294</td> </tr> </table>	Member name	Flemington Oil Mill	Palm Trace ID	RSPO_PO1000000294	Complied
Member name	Flemington Oil Mill						
Palm Trace ID	RSPO_PO1000000294						



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		<table border="1"> <tr> <td>Membership No</td> <td>1-0008-04-000-00 (SDPB)</td> </tr> <tr> <td>Type of business</td> <td>Oil mill</td> </tr> <tr> <td>Licence status</td> <td>Active (25-11-2023 - 04-10-2024)</td> </tr> </table>	Membership No	1-0008-04-000-00 (SDPB)	Type of business	Oil mill	Licence status	Active (25-11-2023 - 04-10-2024)	
Membership No	1-0008-04-000-00 (SDPB)								
Type of business	Oil mill								
Licence status	Active (25-11-2023 - 04-10-2024)								
<p>3.8.5</p>	<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"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>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.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<p>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <ul style="list-style-type: none"> <li>a) SDPB 2022 Sustainable Supply Chain and Traceability Procedure; Doc. ID # SD/SDP/GSD/SCCS/0522/01; Ver. # 01; Effective Date: 1/6/2022</li> <li>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 Daily production summary report; Report ID # Z2501RMM_DAILY_SUMM; Daily production detail report; Report ID # Z2501RMM_DAILY_DTL; for Plant: M174 KKS Flemington etc.</li> <li>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</li> <li>d) Specified in Procedure section 7.0 Receiving FFB at The Mill supported with Appendix 1c: List of Supply Base and Crop Diversion for SOUs</li> </ul> <p><a href="#">Extension of Scope Assessment</a></p> <p>Updates of the procedure has been addressed in the latest SDPB’s Sustainable Supply Chain and Traceability Procedure for Upstream</p>	<p>Complied</p>						

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		Malaysia, Issued by Group Sustainability Department, ver. 02, dated January 2024. Changes made compared to previous version: Section 9.2, 10.8, Appendix 2 – inclusion of new clauses under process monitoring, product dispatch and Rules for FFB diversion to reflect the inclusion of RSPO IP mills with RSPO MB supply chain as scope extension.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>i) The procedure to conduct annual internal audit is addressed in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022. Refer section 18.0 Internal Audit as per latest internal audit report conducted on 12/6/2023:</p> <ul style="list-style-type: none"> <li>- Findings only in Indicator # 1.14 &amp; 6.6.2 of RSPO P&amp;C but no findings in SCCS indicators</li> <li>- All findings were verified closed on 12/7/2023</li> </ul> <p>ii) As per Internal Audit Procedure Doc. ID # SDP/GSD/SCU/IAP; Ver. # 3; Effective date: 10/1/2023</p> <p>Latest Management Review Meeting (MRM) conducted on 3/7/2023</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>Flemington POM maintain the daily records of all certified and uncertified FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details. The mill has maintained records of FFB received such as Delivery Notes and Weighbridge operator. Sample of FFB delivery records:</p> <p>Incoming FFB from Certified Supply Base under SDPB. As per sample:</p>	Complied

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		<ul style="list-style-type: none"> <li>- FFB Receive Ticket # 307534; Supplier: E164 – E-Sabak Bernam; Product: 0002-FFB B Crop; DO # 22288; Field # 2016B Div. One; Nett Weight: 10,240 kg; Date: 12/5/2023</li> <li>- FFB Receive Ticket # 307438; Supplier: E137 – E-Sungai Samak; Product: 0001-FFB A Crop; DO # 48758; Field # 2015A Div. Sungei Dua; Nett Weight: 11,820 kg; Date: 10/5/2023</li> <li>- FFB Receive Ticket # 307435; Supplier: E136 – E-Flemington; Product: 0001-FFB A Crop; DO # 76995; Field # 2015T1 Div. Teluk Buloh; Nett Weight: 11,000 kg; Date: 10/5/2023</li> </ul> <p>ii) As specified in Sustainable Supply chain and Traceability Procedure dated 01/06/2022 section 10.0 Products despatch No overproduction of certified products allowed</p> <p>Mechanism to handle non-conforming FFB and documents has been detailed up in the Procedure Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 11.0.</p>	
<p>3.8.8</p>	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> </ol>	<p>Flemington POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as per sample:</p> <ul style="list-style-type: none"> <li>- Certified CPO:              Buyer: Nuri Edible (NEO) Sdn. Bhd.; Address: Lot 27 PT 234 Lebu Sultan Mohamed 1, Kawasan Perusahaan PKNS Fasa II, Bandar Sultan Suleiman, 42000 Port Klang, Selangor; Seller: KKS Flemington; Address: 36309 Sungei Sumun, Teluk Intan, Perak; Product: 0007-Crude Palm Oil (CPO) – RSPO IP; Despatch date: 30/5/2023; Nett Weight: 39,100 kg; Despatch Ticket # 021653; Contract # S/PSD/2305/CPO0081L; Cert. # RSPO 590802</li> <li>- Certified PK:</li> </ul>	<p>Complied</p>

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	<ul style="list-style-type: none"> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>Buyer: Sime Darby Oils Carey Island KCP Sdn Bhd; Address: Lot 18283, Jalan Pulau Carey, 42960 Pulau Carey, Selangor; Seller: KKS Flemington; Address: 36309 Sungei Sumun, Teluk Intan, Perak; Product: 0008-Palm Kernel – RSPO IP; Despatch date: 31/5/2023; Nett Weight: 32,010 kg; Despatch Ticket # 021658; Contract # S/PSD/2305/PK0035; Cert. # RSPO 590802</p> <p>- Uncertified CPO:</p> <p>Buyer: Wilmar Palm Products Sdn. Bhd.; Address: Lot PT 146144, Jalan Sungai Pinang 5/11/KS11, Taman Perindustrian Pulau Indah, Pulau Indah, Selangor; Seller: KKS Flemington; Address: 36309 Sungei Sumun, Teluk Intan, Perak; Product: 0007-Crude Palm Oil (CPO); Despatch date: 31/5/2023; Nett Weight: 38,980 kg; Despatch Ticket # 021677; Contract # S/PSD/2305/CPO0023B</p>	
<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <ul style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii) The mill shall ensure the following: <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>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.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>i. Flemington POM has established Standard Operating Procedure related Outsourcing Activities. Refer Sustainable Supply chain and Traceability Procedure dated 01/06/2022 with reference number SD/SDP/GSD/SCCS/0522/01 Section 13.0. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Flemington POM was for CPO and PK transportation.</li> <li>ii. The mill ensured as per sighted contract agreement between SDPB and contractor as specified in section 13.0 Outsourced Contractor for samples as following: <ul style="list-style-type: none"> <li>- Letter of Award (LOA) Transportation, Warehousing and Handling Services form SDPB; Ref. # T/H_SDPB/0721/001; Transporter: SXX MXXu (MaXXXXia) Sdn. Bhd.; Contract Period: 1/4/2021 – 31/3/2024</li> <li>- Letter of Award (LOA) Transportation, Transportation of Crude Palm Oil (CPO) (Services) for SDPB Peninsular Malaysia’s Oil Mills; Ref. # T/SDPB/PEN/CPO/0720/003; Transporter:</li> </ul> </li> </ul>	<p>Complied</p>

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	<p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>MXXXXg BaXXXXs Sdn. Bhd.; Contract Period: 1/11/2020 – 31/10/2023</p> <p>c) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on agreements, transporter has no ownership of transported products and owned by buyer.</p> <p>The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements. Refer Section 8.0 Obligation, Undertakings and Covenants Of The Transporter.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system. The independent third parties involve in Mill operation is only transportation services for CPO and PK.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There are no new contractors used for the handling of certified CPO and PK. As per stated in the procedure Section 13.5 “The Mill shall inform in advance the outsourced contractors if audit is deemed necessary by Certification Bodies (CB) and ensure that the contractors engaged provide relevant access for the CBs to their respective operations, system, and any and all information, when this is announced in advance.”	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory</p>	<p>Addressed in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 5.0 Control of Documents &amp; Records.</p> <p>Flemington POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p>	Not Applicable

	<p>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>As per the RSPO Supply Chain – Module: Identity Preserved (IP) procedure, the records retention for RSPO Supply Chain related records and reports to be retained for a minimum of 3 years’ period. Sampled records of FFB weighbridge tickets and daily production records for last 3 years were still in place for verification.</p> <p>i. All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible as per sample RSPO &amp; MSPO Mass Balancing Records for Oil Mill; Mill Name: Flemington POM</p> <p>ii. The retention period for maintaining the traceability records is 3 years as stated in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 5.4.</p> <p>iii. The material and products movement on real-time basis is recorded in “Month End Production Report” for both CPO and PK. The data is summarised in CPO/PK Mass Balance Calculation Among the information available in the format is date, FFB processed, OER, CPO amount (opening, produced and closing) and transferred CPO (mill weight, refinery weight).</p> <p>iv. Not Applicable since the model use was IP</p> <p><u><a href="#">Extension of Scope Assessment</a></u></p> <p>The mill does not have any intention to accept and process any non-certified FFB, CPO or PK. All the FFB are supplied by its own certified supply base or other Sime Darby’s certified estates on ad hoc basis. Thus, the palm oil content of its products is 100% IP-certified. This extension of scope assessment is conducted so that the mill can classify and sell its IP-certified CPO or PK as MB-</p>	
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		<p>certified. It does not imply that the mill has the capacity to receive non-certified FFB and produce MB module CPO/PK and IP module CPO/PK separately. This has been addressed in the latest SDPB's supply chain procedure mentioned in Indicator 3.8.5, Section 9.2 (ii), which reads:</p> <p>"The scope extension of RSPO IP Mills to include RSPO MB Supply Chain is <b>mainly</b> to enable the sales of products through the RSPO MB option.</p> <p>For RSPO IP Mills with RSPO MB scope extension, the mills to refer to the requirements of RSPO IP in this procedure.",</p> <p>in Section 10.8, which reads:</p> <p>"For contract allocation, declassification/downgrading shall only be in the following order:</p> <ul style="list-style-type: none"> <li>i. RSPO: Identity Preserved → Segregation → Mass Balance → Non-certified</li> </ul> <p>Sales of products by GT (Global Trading) will be in accordance to the certified modules of supply chain as stated in the RSPO and/or MSPO certificates.",</p> <p>and in Appendix 2, which reads:</p> <p><u>"For RSPO-certified Mills</u></p> <ul style="list-style-type: none"> <li>i. If a mill is Identity Preserved, it shall only receive FFB from RSPO certified sources.</li> <li>ii. For Mills that are MB certified, they can receive FFB from both certified and non-certified estates. No separation required provided records of FFB volume processed, CPO produced and dispatched are maintained.</li> </ul> <p>*For Mills with RSPO IP and MB Supply Chains (as scope extension), refer to requirements for RSPO IP Mills."</p>	
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3.8.13	<p><b>Extraction Rate</b> The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Verified OER and KER as below.</p> <table border="1" data-bbox="1153 443 1926 552"> <thead> <tr> <th>Month</th> <th>OER</th> <th>KER</th> </tr> </thead> <tbody> <tr> <td>Jul 2022 – June 2023</td> <td>19.30</td> <td>4.42</td> </tr> </tbody> </table>	Month	OER	KER	Jul 2022 – June 2023	19.30	4.42	Complied
Month	OER	KER							
Jul 2022 – June 2023	19.30	4.42							
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Flemington POM derives the extraction rates based on the actual extraction rate produced in the mill. Therefore, the accuracy is continuously maintained.</p>	Complied						
3.8.15	<p><b>Processing</b> For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Based on the announcement summary, all the registrations were found to be in order. No RSPO volume sold for other scheme. RSPO certified volume only downgraded to conventional CPO/PK. Refer Sustainable Supply chain and Traceability Procedure dated 01/06/2022. From the record verification no outsider FFB accepted in Flemington POM. The FFB source only from supply base and under parent company which is also certified estates.</p>	Complied						
3.8.16	<p><b>Registration of Transactions</b> 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.</p>	<p><b>Registration of transactions</b> i) The registration of PalmTrace is carried out by the Sime Darby's Global Trading Department, HQ. All transaction will be registered in the PalmTrace. Verified the registration of CPO Sale as per Table 11 above. RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace.</p>	Complied						
3.8.17	<p><b>Claims</b></p>	<p>RSPO trademark was not used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied						



	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.		
<b>General corporate communications</b>			
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.	The SDPB website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications.	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	NA as not assessed during the extension of scope assessment.	Not Applicable
4.3	Members are <b>not allowed</b> to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	No evidence of RSPO corporate logo used by Flemington POM and verified through document and site review (notice board, business card, shipping documentation, etc.	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 communication did not imply any such that being an RSPO member means had certified to RSPO related certifications and selling of its oils are considered RSPO certified.	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: <ul style="list-style-type: none"> <li>"We have been sourcing RSPO certified palm oil since (YEAR)."</li> <li>"We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year."</li> </ul>	NA as not assessed during the extension of scope assessment.	Not Applicable

	<ul style="list-style-type: none"> <li>• “We have been RSPO certified since (YEAR).”</li> <li>• “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.”</li> <li>• “In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified.”</li> <li>• “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.”</li> <li>• “We are RSPO certified. Ask us for our RSPO certified products.”</li> </ul>		
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <p>i. “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).”</p> <p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: “This reported figure is not audited through RSPO Certification”.</p>	NA as not assessed during the extension of scope assessment.	Not Applicable
<b>Product-specific communications</b>			
<b>5.1 General</b>			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These	NA as not assessed during the extension of scope assessment.	Not Applicable

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	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.		
5.1.2	Product-specific communications are voluntary.	NA as not assessed during the extension of scope assessment.	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 not assessed during the extension of scope assessment.	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 not assessed during the extension of scope assessment.	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 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 <ul style="list-style-type: none"> <li>• RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field.</li> <li>• Both parties shall inform their certification body in writing about the agreement.</li> <li>• 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.</li> </ul>	NA as not assessed during the extension of scope assessment.	Not Applicable
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as 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	NA as not assessed during the extension of scope assessment.	Not Applicable

	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		
<b>5.2 Off pack claims</b>			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	NA as not assessed during the extension of scope assessment.	Not Applicable
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	NA as not assessed during the extension of scope assessment.	Not Applicable
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"> <li>• 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.</li> <li>• If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2.</li> </ul>	Not applicable since Flemington POM is not under distributor or wholesaler category.	Not Applicable

5.3 On pack claims			
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	NA as not assessed during the extension of scope assessment.	Not Applicable
5.3.2	In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. 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: A) For Identity Preserved (IP)/ Segregated (SG) Certified Products: <ul style="list-style-type: none"> <li>• RSPO IP/SG CERTIFIED*</li> <li>• Contains RSPO IP/SG palm oil*</li> <li>• Contains RSPO certified palm oil (IP/SG)*</li> </ul> *Add RSPO TM Licence Number below or next to the claim.	NA as not assessed during the extension of scope assessment.	Not Applicable
	B) or Mass Balance (MB) Certified Products: <ul style="list-style-type: none"> <li>• RSPO MIXED*</li> <li>• Contributes to the production of RSPO certified palm oil*</li> <li>• Contains RSPO certified palm oil (MB)*</li> </ul> *Add RSPO TM Licence Number below or next to the claim.	NA as not assessed during the extension of scope assessment.	Not Applicable
	C) For Partially Certified Products: <ul style="list-style-type: none"> <li>• RSPO 50% MIXED*</li> <li>• Contains at least 50% RSPO certified palm oil*</li> </ul> *Add RSPO TM Licence Number below or next to the claim.	NA as not assessed during the extension of scope assessment.	Not Applicable
	D) For Products covered with Book and Claim (B&C): <ul style="list-style-type: none"> <li>• RSPO CREDITS*</li> </ul>	NA as not assessed during the extension of scope assessment.	Not Applicable

	<ul style="list-style-type: none"> <li>• Supports the production of RSPO certified palm oil*</li> <li>• Contains palm oil covered by the purchase of RSPO Credits*</li> </ul> <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 not assessed during the extension of scope assessment.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	NA as not assessed during the extension of scope assessment.	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 not assessed during the extension of scope assessment.	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 not assessed during the extension of scope assessment.	Not Applicable
<b>MODULE A – IDENTITY PRESERVED (Delete Non Applicable Module)</b>			
	95% of the palm oil content must be RSPO IP certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
	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.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
<b>Messaging</b>			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> <li>• The palm oil products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>	No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Flemington POM is producing crude palm product and does not involve in any labelling of end product.	Complied

	<ul style="list-style-type: none"> <li>• RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>		
<b>Product-Specific Communications Labelling</b>			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• RSPO Trademark that includes the tag "CERTIFIED"; or</li> <li>• RSPO Trademark that includes the tag "This product contains certified sustainable palm oil".</li> </ul>	Flemington POM is producing crude palm product and does not involve in any labelling of end product.	Complied
<b>MODULE B – MASS BALANCE SPECIFIC RULES (Delete Non Applicable Module)</b>			
<b>Mass Balance palm oil content</b>			
	95% of the palm oil content must be RSPO MB-certified.	The mill does not have any intention to accept and process any non-certified FFB, CPO or PK. Cross refer to Indicator 3.8.12 for further information.	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.	The mill does not have any intention to accept and process any non-certified FFB, CPO or PK. Cross refer to Indicator 3.8.12 for further information.	Complied
<b>Messaging</b>			

	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> <li>• [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.</li> <li>• 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.</li> </ul>	<p>The mill does not have any intention to accept and process any non-certified FFB, CPO or PK. Cross refer to Indicator 3.8.12 for further information.</p>	<p>Complied</p>
<p><b>Product-Specific Communications Labelling</b></p>			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil".</li> </ul>	<p>The mill does not have any intention to accept and process any non-certified FFB, CPO or PK. Cross refer to Indicator 3.8.12 for further information.</p>	<p>Complied</p>
<p><b>Principle 4: Respect community and human rights and deliver benefits</b></p>			
<p><b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> 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>SOU 4 has implemented the Sime Darby's Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance with the United Nations declaration on Human Rights Defender.</p> <p>Awareness and training to all workers for them to understand their responsibility in respect of human rights were conducted from time to time during daily morning muster assembly briefing and specific</p>	<p>Complied</p>



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		<p>meetings between the workers and management with sample recent records as following:</p> <ul style="list-style-type: none"> <li>- Flemington Estate dated on 2/5/2023.</li> <li>- Flemington POM dated on 3/8/2023.</li> <li>- Began Datoh Estate dated on 4/6/2023.</li> </ul> <p>Communications to external stakeholders including vendors and local communities were made during external stakeholder consultation meeting with latest conducted on 30/05/2023.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the mill and estates within SOU 4 do not instigate violence or use any form of harassment in their operations.</p> <p>Consultation with sample external stakeholders conducted during on-site assessment also confirmed no violence or use of any form of harassment in the operations of both mill and estates within SOU 4.</p>	Complied
<b>Criterion 4.2:</b> 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><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.</p> <p>Based on the records of complaints and grievances, no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed the information.</p>	Complied

<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>SDPB has implemented Grievances Response Standard Operating Procedure dated 18/07/2022. The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with internal and external communications has been detailed in the Section 2.2. Flow chart procedure and 3.3 The time scale of investigation.</p> <p>Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.</p> <p>Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders.</p> <p>SDPB implemented various channel platform to internal and external stakeholders to communicate grievances to managements as following:</p> <ol style="list-style-type: none"> <li>1. Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found via website link: <a href="https://www.simedarby.com/operating-responsibly/whistleblowing">https://www.simedarby.com/operating-responsibly/whistleblowing</a>.</li> <li>2. 'Suara Kami' a platform for the workers to raise any issue. The workers were briefed on the complaint mechanism during morning muster.</li> <li>3. The latest initiative introduced (Workers Helpline) which effective from August 2021.</li> <li>4. External stakeholders meeting.</li> </ol> <p>Onsite interviewed with the internal and external stakeholders informed they have been briefed on the complaint mechanism includes Suara Kami, Workers Helpline and stakeholders meeting as</p>	<p>Complied</p>
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		platform for complaints channel which currently implement by the company.	
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 -	Neither any complaints nor land dispute occurred in the SOU 4 Certification Unit since the last audit based on verification from documented information and stakeholder consultation.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	SDPB has implemented Grievances Response Standard Operating Procedure dated 18/07/2022 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.	Complied
<b>Criterion 4.3:</b> 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 -	Contributions to community development based on the results of consultation with local communities are demonstrated as per sample sighted as following: <ul style="list-style-type: none"> <li>- Provision of traffic control marshal to SJKT Ladang Sungai Samak for Cross Country Running Event dated on 13/4/2023</li> <li>- Regular (at least monthly) free grass cutting and drainage cleaning service for SJKT Ladang Sungai Samak football field latest dated 6/4/2023</li> <li>- Water supply contribution to local neighbour community during draft water shortage season; Latest date: 9/10/2022</li> <li>- Sabak Bernam Estate joined program with Klinik Kesihatan Sabak Bernam to conduct Mantoux Test of all employees; Date: 19/6/2023</li> </ul>	Complied
<b>Criterion 4.4:</b> 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.			

<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.          - Critical (Major) compliance -</p>	<p>SOU 4 able to demonstrate the evidence of legal ownership of its lands through possession of land title documents showing legal ownership available as per sample as following:  <u>Flemington Estate:</u>          - Total land titles: 42; Total area: 1,832.37 ha reduced by 74.47 ha from 1,906.84 from last year due to sale for development  <u>Sungai Samak Estate:</u>          - Total land titles: 10; Total area: 3,025.74 ha, HCV 7.81 ha  <u>Sabak Bernam Estate:</u>          - Total land titles: 7; Total area: 2,511.79 ha, HCV 1.24 ha          No land issue 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.</p>	<p>Complied</p>
<p>4.4.2</p>	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>SDPB developed a Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development.          No land issue 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.          Onsite visit to boundary area, sighted boundary stone and trenches were available to demarcate the boundary of land.          Onsite interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.          In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3</p>	<p>Complied</p>

		dated 01/11/2008 documented the process in handling boundaries disputes.	
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 of land dispute issue occur in all estates within SOU 4 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	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 -	No issues of land dispute issue occur in all estates within SOU 4 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	No issues of land dispute issue occur in all estates within SOU 4 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.3	<b>(C)</b> 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 -	No changes to estate perimeters as per boundary maps available for all estates within SOU 4 clearly demarcating estate area with location and coordinate of boundary stone and pegs. There is no land dispute recorded since last audit. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated	Complied

		01/11/2008 documented the process in handling boundaries disputes.	
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 -	No issues of land dispute issue occur in all estates within SOU 4 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.5	<b>(C)</b> 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 -	No issues of land dispute issue occur in all estates within SOU 4 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No issues of land dispute issue occur in all estates within SOU 4 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
<b>Criterion 4.5:</b> 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	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 4. The estate lands are legally	Complied

		owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	
4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 4. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 4. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 4. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic,</p>	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 4. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any	Complied

	environmental and social implications of the proposed operations on their lands. - Minor compliance -	legal, customary and user rights. Land titles and ownerships of the lands were available.	
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 -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 4. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	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 -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 4. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 4. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
<b>Criterion 4.6:</b> 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	<b>(C)</b> 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 -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 4. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. However, in case of any dispute, reference will	Complied



		be made to existing established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008 for establishment with disputed party.	
4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 4. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. However, in case of any dispute, reference will be made to existing established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008 for establishment with disputed party.	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 4. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 4. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
<p><b>Criterion 4.7:</b> 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.</p>			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well.	Complied

		There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well.</p> <p>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well.</p> <p>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied
<p><b>Criterion 4.8:</b> 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.</p>			
4.8.1	<p>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.</p> <p>- Minor compliance -</p>	<p>SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well.</p> <p>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied
4.8.2	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well.</p> <p>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied

4.8.3	<p>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)</p> <p>- Minor compliance -</p>	<p>SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well.</p> <p>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied
4.8.4	<p>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).</p> <p>- Minor compliance -</p>	<p>SDPB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well.</p> <p>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied
<p><b>Principle 5: Support smallholder inclusion</b></p>			
<p><b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. As a result, this particular indicator is not applicable.</p>	Complied
5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from</p>	Complied

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		neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. As a result, this particular indicator is not applicable.	
5.1.3	<p><b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. As a result, this particular indicator is not applicable.	Complied
5.1.4	<p><b>(C)</b> 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>	Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. As a result, this particular indicator is not applicable.	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. As a result, this particular indicator is not applicable.	Complied

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5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.          - Critical (Major) compliance -</p>	<p>Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. As a result, this particular indicator is not applicable.</p>	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).          - Minor compliance -</p>	<p>Weighbridges were calibrated annually, and evidence of calibration certificates were available as below.</p> <table border="1" data-bbox="1137 753 1930 1043"> <thead> <tr> <th>Weighbridge</th> <th>Date of stamping</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>M. Toledo ATK00249 – 60,000 kg (60 mt)</td> <td>16/06/2023 (DE18005710)</td> <td>Serial No.: B829135381</td> </tr> <tr> <td>M. Toledo ATK00349 – 60,000 kg (60 mt)</td> <td>16/06/2023 (DE18005711)</td> <td>Serial No.: B827064816</td> </tr> </tbody> </table>	Weighbridge	Date of stamping	Remarks	M. Toledo ATK00249 – 60,000 kg (60 mt)	16/06/2023 (DE18005710)	Serial No.: B829135381	M. Toledo ATK00349 – 60,000 kg (60 mt)	16/06/2023 (DE18005711)	Serial No.: B827064816	Complied
Weighbridge	Date of stamping	Remarks										
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M. Toledo ATK00349 – 60,000 kg (60 mt)	16/06/2023 (DE18005711)	Serial No.: B827064816										
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.          - Minor compliance -</p>	<p>Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. As a result, this particular indicator is not applicable.</p>	Complied									

5.1.9	<p><b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. Sime Darby Plantation Mill Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 01/04/2008) established to handle if there is any external complaint. Verification on grievance record found no complaint records is available on FFB sales and purchase activity, as the mill only process internal crops from SDPB estates.</p>	Complied
<p><b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
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>Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. As a result, this particular indicator is not applicable.</p>	Not Applicable
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p>	<p>Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from</p>	Not Applicable

	- Minor compliance -	neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. As a result, this particular indicator is not applicable.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. As a result, this particular indicator is not applicable.	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. As a result, this particular indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Commencing 24/07/2021, there will be no further receiving of OCP FFB. This change is a result of the management's decision to transition from the MB to the IP module. The mill will exclusively accept RSPO certified crops sourced from SOU 04 own group estates which are Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate as well as from neighbouring SOU 05 Seri Intan when the mill is having diversion due to mill inspection. As a result, this particular indicator is not applicable.	Not Applicable

<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1: Any form of discrimination is prohibited.</b>			
6.1.1	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 4 has continuously implemented Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 2<sup>nd</sup> December 2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age. Sample communications made by estates sighted as following:</p> <ul style="list-style-type: none"> <li>- Flemington Estate dated on 2/5/2023.</li> <li>- Flemington POM dated on 3/8/2023.</li> <li>- Bagan Datoh Estate dated on 4/6/2023.</li> </ul>	Complied
6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Latest records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against and no charges of recruitment fees on the foreign workers made.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>No discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is continuously based on skills, capabilities, medical fitness necessary etc. This was confirmed from job vacancy advertisement and sample recruitment sighted. Workers' promotions are based on skills, capabilities, qualities and medical fitness necessary for the jobs required.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>Pregnancy testing was continuously conducted only for women employee involved in chemical handling work to ensure no pregnant women working with the risk of chemical exposure. All women</p>	Complied



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	- Minor compliance -	employees involved in chemical handling work within SOU 4 continuously underwent Urine Pregnancy Test (UPT) conducted by respective estate's Hospital Assistant upon request only. In case of any pregnant women identified among chemical sprayers, she will be transferred to other general light work not involving chemicals. This also applied to breastfeeding mother.	
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability &amp; Quality Policy continuously covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly and through Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability &amp; Quality Management (PSQM) Department. It explained the types of gender-based violence &amp; grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management.</p> <p>The committee was established based on SDPB's documented Terms of Reference for Gender Representatives (GR) and Gender Committees (GC); March 2021. Latest SOU 4 Gender Committee Meeting Date: 15/7/2023. Latest operating units gender committee meeting conducted as following:</p> <ul style="list-style-type: none"> <li>- Flemington Estate; Date: 7/6/2023</li> <li>- Began Datoh Estate; Date: 18/7/2023</li> <li>- Sungai Samak Estate; Date: 13/6/2023</li> <li>- Sabak Bernam Estate; Date: 16/3/2023</li> </ul> <p>No sexual harassment case been reported since the last audit.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	No discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed	Complied

		<p>during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each worker mentions the same regardless of skin colour, religion, race and caste. Evidence of equal pay sighted based on following:</p> <ul style="list-style-type: none"> <li>- Passports &amp; work permit</li> <li>- Work agreement</li> <li>- Payslip &amp; Checkroll</li> <li>- SOCSO &amp; EPF contribution form</li> </ul> <p>of sample months of highest, lowest and average (FFB) productions for sample female and male employees as following:</p> <p><u>Flemington Estate:</u></p> <p>A sample of 11 from 178 (5 LW + 6 FW – Bangladeshi, Indian &amp; Indonesian) Flemington Estate workers among 3 female and 8 male Field Workers, General Workers, FFB Cutters, Tractor Drivers, Machine Operators, FFB Carriers, Loose Fruit Collectors, and mandores were checked for the month of Feb 2023, Apr 2023 and May 2023.</p> <p><u>Bagan Datoh Estate:</u></p> <p>A sample of 14 from 298 (6 LW + 8 FW – Bangladeshi, Indian, &amp; Indonesian) Bagan Datoh workers among 5 female and 13 male Field Workers, General Workers, FFB Cutters, Tractor Drivers, Machine Operators, FFB Carriers, Loose Fruit Collectors, and mandores were checked for the month of Nov 2022, Feb 2023 and May 2023.</p> <p><u>Flemington POM:</u></p> <p>A sample of 8 from 101 (6/89 LW + 2/12 FW – Indonesian) Flemington POM workers among 3 female and 5 male general workers, shift operators, mechanical and electrical fitters and</p>	
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		<p>mandores were checked for the month of Nov 2022, Apr 2023 and May 2023.</p> <p><u>Sungai Samak Estate:</u></p> <p>A sample of 13 from 248 (6 LW + 7 FW – Bangladeshi, Indian, &amp; Indonesian) Sungai Samak Estate workers among 4 female and 9 male Field Workers, General Workers, FFB Cutters, Tractor Drivers, Machine Operators, FFB Carriers, Loose Fruit Collectors, and mandores were checked for the month of Nov 2022, Feb 2023 and Jul 2023.</p> <p><u>Sabak Bernam Estate:</u></p> <p>A sample of 11 from 197 (5 LW + 6 FW – Bangladeshi, Indian, &amp; Indonesian) Sabak Bernam workers among 3 female and 8 male Field Workers, General Workers, FFB Cutters, Tractor Drivers, Machine Operators, FFB Carriers, Loose Fruit Collectors, and mandores were checked for the month of Nov 2022, Apr 2023 and May 2023.</p>	
<p><b>Criterion 6.2:</b> 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).</p>			
<p>6.2.1</p>	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>All the workers are under direct employment and some electrical works are under contractor workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary etc. as per employment contract in compliance with requirements of latest available:</p> <ul style="list-style-type: none"> <li>- MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019 Memorandum of Agreement Between the Malayan Agricultural Producers Association (MAPA) and the National Union of Plantation Workers (NUPW) on Rates of Pay and Other Conditions of Service in Respect of Field and Other General Employees; MAPA/C/3(12)</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019 Memorandum of Agreement Between the Malayan Agricultural Producers Association (MAPA) and the National Union of Plantation Workers (NUPW) on Rates of Pay and Other Conditions of Service in Respect of Field and Other General Employees; MAPA/C/3(12) Appendix A, B, C, D, E &amp; Agreed Note # 1, 2, 3 &amp; 4.</li> </ul> <p>Work agreements also in compliance with Permit of Salary Deduction under Section 24 Employment Act 1955 for Electricity Bill payment; Ref. # BHG.PU/9/129 JLD 33 (53); Date: 6/7/2017.</p> <p>Explanations given as per sample latest explanation by management through briefing on piece rate pay for harvester conducted on 2/5/2023 by Flemington Estate management to harvesters.</p>	
6.2.2	<p><b>(C)</b> 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 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>Other than mill and estates' own checkroll employment records sighted as per sample in indicator 6.1.6 above, a sample contractor's workers agreement also verified as following:</p> <ul style="list-style-type: none"> <li>- Contractor: Axxx (Machine Rental); Employee name: Oxxx; Date employed: 1/1/2023; Post: Excavator Driver</li> </ul> <p>Based on the records of payslip, attendance, Socso and EPF contribution forms copies kept by estate confirmed that the payroll documents give accurate information on compensation for all work performed by contractors' workers.</p>	Complied
6.2.3	<p><b>(C)</b> 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>Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 above. Records shown all relevant legal compliance requirements were met by SOU 4.</p>	Complied

<p>6.2.4</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>All estates and mill within SOU 4 provide adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities based on the requirements of Act 446 Employees’ Minimum Standards of Housing, Accommodations and Amenities Act 1990 and Workers’ Minimum Standards of Housing and Act A1604 Amenities (Amendment) Act 2019. These were demonstrated based on SDPB 2021 Workers Housing Management Procedure; Ver. # 0; Effective Date: 26/11/2021 requiring weekly PIOA housing inspection and EWC quarterly or as and when required inspection with latest records as following:</p> <ul style="list-style-type: none"> <li>- Flemington Estate VMO visit date: 2/8/2023 by Dr. Ravindran from Sabak Dispensary, Sabak Bernam, Selangor</li> <li>- Flemington Estate Housing Complex/NEST/Community Hall Weekly Inspections (PIOA) date; 3/8/2023; Score 95%</li> <li>- Flemington Estate Housing Complex/NEST/Community Inspections (EWC) date: 12/7/2022; Score 97%</li> <li>- Flemington Estate OPP latest report date: 1/8/2023; resolved date: 4/8/2023</li> <li>- Sungai Samak Estate VMO latest visit date: 3/8/2023 by Dr. Tan Kim Soon from Klinik KS Tan, Teluk Intan, Perak</li> <li>- Sungai Samak Estate Housing Complex/NEST/Community Hall Weekly Inspections (PIOA) date; 31/7/2023; Score 79%</li> <li>- Sungai Samak Estate Housing Complex/NEST/Community Inspections (EWC) date: 5/6/2022; Score 0%</li> <li>- Sungai Samak Estate OPP latest report date: 30/7/2023; resolved date: 2/8/2023</li> </ul> <p>Sighted too the records of housing repair request system Oil Palm Pal (OPP) maintained by mill and estates. Verified OPP summary</p>	<p>Complied</p>
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		indicated no delay in action taken to address issues reported by workers.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	The mill and estates within SOU 4 ensured affordable food for its employee through canteen food price monitoring as part of terms in the Mill Canteen Tenancy/Rental Agreement as per sample for Flemington Estate dated 1/1/2022 which is valid until 31/12/2023. Visit to the canteen/sundry found that prices were clearly displayed for goods been sold. Consultation with workers also indicated they have no issue with food pricing.	Complied
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. <b>PROCEDURAL NOTE:</b> STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE 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). <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> 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	SDPB provided a 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. In absence of DLW, SOU 4 Flemington management conducted Prevailing Wage Assessment based on check-roll worker for period of July 2023. Denominator of total headcount Workforce: 1023; Worker: 825; Local worker: 247; Foreign worker: 578. Review of payslips found that the salary received complied with the minimum wage order 2022 and the decent living wage set up by the group which local workers received wages with average of RM 2,231.66 per workers and for foreign workers received wages with average of RM 2,303.57 per workers.	Complied

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	<p>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 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"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• 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</li> <li>• 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.</li> </ul> <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>Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within SOU 4.</p>	Complied
<p><b>Criterion 6.3:</b> The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			

<p>6.3.1</p>	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>- Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>- Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> </ul> <p>Company respects the rights of all personnel to form and join trade unions of their choice to bargain collectively and the workers have their freedom to join the NUPW/MAPA union.</p> <p>These statements were available on notice boards within office area and were explained to workers from time to time by management during daily morning muster sessions.</p>	<p>Complied</p>
<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>The mill and estates within SOU 4 established the Employee Welfare Committee as operating unit level collective bargaining medium. Sighted the records of latest minutes of meeting available for meeting between the NUPW representatives and operating unit management as following:</p> <ul style="list-style-type: none"> <li>- Flemington Estate: Latest meeting between management and union (NUPW) representative conducted on 9/12/2022</li> <li>- Bagan Datoh Estate: Latest meeting between management and union (NUPW) representative conducted on 3/1/2023</li> <li>- Flemington POM: Latest meeting between management and workers union (NUPW) and staff union (AMESU) representative conducted on 23/5/2023</li> </ul>	<p>Complied</p>



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		<ul style="list-style-type: none"> <li>- Sungai Samak Estate: Latest meeting between management and workers union (NUPW) representative conducted on 24/6/2023</li> <li>- Sabak Bernam Estate: Latest meeting between management and workers union (NUPW) representative conducted on 20/2/2023</li> </ul>	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Interview with workers union representatives (NUPW Chairman &amp; NUPW Secretary) confirmed that they were independently elected as the NUPW by all members of NUPW among mill and estate workers via an election without interference by the management.</p> <p>The representatives also been acknowledged by Perak Branch NUPW as per letter from NUPW Perak Branch of NUPW Local Committee Members.</p>	Complied
<b>Criterion 6.4:</b> Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>“We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>- Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>- Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>- Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations.</li> <li>- Enhancing Safety and Health: We provide a safe and healthy</li> </ul>	Complied

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		<p>working environment for our employees and workers in our operations and support the wellbeing of our communities.</p> <ul style="list-style-type: none"> <li>- Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use.</li> <li>- Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees.</li> <li>- Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.”</li> </ul> <p>Verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the abolishment of child labour &amp; protecting the rights of children available in the Vendor COBC clause 5.8, Human Rights Charter-protecting the rights of children.</p>	
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liaison &amp; Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the interview and employees master lists data, no young person below 18 years old employed within all operating units within SOU 4.</p>	Complied

6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them.</p>	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>- Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims.</li> <li>- Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.</li> </ul> <p>The policy was communicated through the Gender Committee meeting conducted quarterly. Sample latest communication on policy related to sexual harassment awareness, intimidation, threats &amp; isolation was conducted during Sungai Samak Estate Morning Muster Briefing date: 23/6/2023.</p>	Complied
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 4 has implemented Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director dated on 02/12/2019 supported by the SDP Human Rights Charter where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the</p>	Complied

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		<p>policies was conducted during morning muster as per sample in Sabak Bernam Estate Refresher training on RSPO, MSPO, SDPB Policies &amp; Procedures conducted during morning muster dated 24/5/2023.</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>As verified during on-site interview with relevant stakeholders, management of mill and estates within SOU 4 conducted the assessment of new mothers in consultation with new mothers and taken actions to address their needs.</p> <p>The assessment was based on SDPB’s documented Terms of Reference for Gender Representatives and Gender Committees; March 2021 Conducted as per records of Assessment for New Mothers as following:</p> <ul style="list-style-type: none"> <li>- Sungai Samak Estate; Date: 10/7/2023; No new mothers (with infant under 24 months)</li> <li>Sabak Bernam Estate; Date: 6/6/2023; 2 new mothers with child aged 2 months and 18 months respectively</li> </ul>	Complied
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>Mechanism established as SDPB Group Sustainability Grievance Response Standard Operating Procedure; Ver. # 2; Effective Date: 18/7/2022.</p> <p>SOU 4 maintained the current Gender Committee Handbook, First Edition 2014 established by the company. The handbook has no changes and objectives to implementation framework and guidelines as grievance reporting procedure for woman was developed. The new Term of Reference for Gender Representative and Gender Committee dated March 2021 has been introduced to improve the implementation of gender related activities in SDPB.</p> <p>Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance</p>	Complied

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		<p>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 4 since the last audit.</p>	
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>All workers have entered into employment voluntarily. Employment of local workers are based on established Standard Operating Procedure Title: Hiring of Local Workers; Doc. # 01-12-19; Effective date: 1/12/2019; Rev. # 1 while employment of foreign workers are implemented as per by SDPB's Responsible Recruitment Policy Migrant Worker Responsible Recruitment Procedure effective 20 August 2021 which specify the following:</p> <ul style="list-style-type: none"> <li>- No Recruitment fees – SDPB core principle of zero-cost means no worker should pay for a job. SDPB shall bear all the costs of recruitment. The Group has reimbursed most of its foreign workers currently within its employ who may have paid recruitment fees to secure employment with the Group.</li> <li>- No retention of documents – SDP do not withhold or detain workers' passports or personal documents.</li> <li>- No contract substitution – Workers' agreements to the terms and conditions of recruitment and employment is voluntary and free from deception or coercion.</li> <li>- SDPB appoint ethical recruitment agents and protect workers from any form of coercion, intimidation or deception in the process of seeking employment in SDPB.</li> <li>- Historic recruitment fees (unreported payments charged by agents, sub-agents or other third parties to SDP's foreign workers</li> </ul>	Complied

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		<p>in countries of origin, in contravention of SDP's zero recruitment fee policy) reimbursed to current and former workers.</p> <p>Recruitment policies, processes and practices have effective due diligence systems in place to ensure ethical recruitment. All workers are in possession of their own personal documents and have individual, secure lockers within their own accommodation to keep them.</p>							
6.6.2	<p><b>(C)</b> 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>SOU 4 has implemented a Sime Darby's Human Rights Charter on where they committed as below:</p> <ul style="list-style-type: none"> <li>a. Providing equal opportunity</li> <li>b. Respecting freedom of association</li> <li>c. Eradicating any form of exploitation</li> <li>d. Ensuring favourable working conditions</li> <li>e. Enhancing Safety and Health</li> </ul> <p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights.</p>	Complied						
<b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.									
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;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>Flemington Palm Oil Mill has appointed the Mr Abd Ghafar Bin Sulaiman, Mill Manager to be the OSH Committee Chairman. The appointment was made by Regional Chief Executive Officer on 01/01/2023</p> <p>The safety meeting was conducted at mill once every three months: Sighted the records of the meeting:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">No</th> <th style="width: 40%;">Memo date</th> <th style="width: 50%;">Meeting date</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">09/06/2023</td> <td style="text-align: center;">23/06/2023</td> </tr> </tbody> </table>	No	Memo date	Meeting date	1	09/06/2023	23/06/2023	Complied
No	Memo date	Meeting date							
1	09/06/2023	23/06/2023							

2	16/03/2023	22/03/2023
3	20/12/2022	22/12/2022
4	21/09/2022	23/09/2022

Flemington Estate

The estate has appointed Mr Roshaisam Bin Roselee, Estate Manager to be the OSH Chairman for Flemington Estate, dated 01/01/2023. The appointment was made by Regional Chief Executive

The estate has conducted the safety meeting which are done once every three months. Sample sighted regarding the meeting; details are as the following:

No	Memo date	Meeting date
1	12/06/2023	26/06/2023
2	20/03/2023	06/04/2023
3	23/12/2023	05/01/2023
4	20/09/2023	26/09/2023

Began Datoh Estate

The estate has appointed En Yusri Bin Isa to be the OSH Chairman for began Datoh, dated 01/01/2023. The appointment was made by Regional Chief Executive

The estate has conducted the safety meeting which are done once every three months. Sample sighted regarding the meeting; details are as the following:

No	Memo date	Meeting date
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		1	31/05/2023	06/06/2023
		2	02/03/2023	06/03/2023
		3	01/12/2022	06/12/2023
		4	01/09/2023	23/09/2023
		<u>Sungai Samak Estate</u>		
		The estate has appointed En Azrel Ramadlan Bin Amir to be the OSH Chairman, dated 15/02/2023. The appointment was made by Manager.		
		The estate has conducted the safety meeting which are done once every three months. Sample sighted regarding the meeting; details are as the following:		
		No	Memo date	Meeting date
		1	01/06/2023	14/06/2023
		2	17/03/2023	31/03/2023
3	14/10/2023	28/10/2023		
4	15/07/2023	29/07/2023		
5	14/04/2022	28/04/2022		
6	14/01/2022	28/01/2022		
Found that there is a gap between October 2022 until March 2023 which is due to the passing away of OSH Chairman. The meeting is changed from January until March for meeting for each quarter meeting.				
<u>Sabak Bernam Estate</u>				



The estate has appointed Mr Mohd Mahyudin Bin Mohd Yunus to be the OSH Chairman for Sabak Bernam Estate, dated 06/01/2023. The appointment was made by Regional Chief Executive

The estate has conducted the safety meeting which are done once every three months. Sample sighted regarding the meeting; details are as the following:

No	Memo date	Meeting date
1	12/05/2023	19/05/2023
2	14/02/2023	21/02/2023
3	16/11/2022	25/11/2022
4	17/08/2022	25/08/2022

The agenda of the meeting as the following:

1. Chairman's Opening Speech
2. Previous meeting conformation
3. OSH policy
4. HIRARC Checking
5. CHRA Checking
6. Health Surveillance Report
7. Health Assessment
8. PPE
9. Emergency Response Plan
10. Workplace Inspection
11. Other issues related to OSHA

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6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>The management of SOU 04 estate and mill at each estate has established the Accident/Incident Management Flow Chart. The chart is divided into three main clause which are the near miss, minor accident, and major accident. The training emergency response plan was conducted on 09/06/2023 at Flemington Estate, 02/06/2023 at Bagan Datoh Estate, and 13/06/2023 at Sabak Bernam Estate.</p> <p>Interview with sample workers found the awareness on the accident and emergency management was found sufficient.</p>	Complied
6.7.3	<p><b>(C)</b> 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>Appropriate personal protective equipment (PPE) has been provided to all workers at no cost by the management. A visit to the Spraying Gang, Harvesting Gang, and Manuring Gang, as well as inspections of the estates' and mill's stores, revealed the proper utilization of the required PPEs by the personnel.</p> <p>The estates maintain well-kept facilities where workers can sanitize themselves before leaving for home after work. The showers are in satisfactory operational condition. Conversations with workers confirmed that the PPE is given to them for free and found that their awareness of the necessity to sanitize themselves before heading home, attributed to the potential hazards posed by chemical residues.</p>	Complied
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>All workers are provided with medical care and covered by accident insurance as required by Malaysian law. This ensures that any costs resulting from work-related incidents causing injury or sickness are appropriately addressed. Such measures prioritize the well-being and safety of workers, promoting responsible and compliant practices in line with legal requirements. Sighted the record of SOCSO Contribution for each estate as the following:</p> <p>Flemington Estate</p>	Complied

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Month	Total Workers	Contribution (RM)
January 2023	142	5,544.70
April 2023	170	7,874.10
June 2023	168	6,256.60
<b><u>Bagan Datoh Estate</u></b>		
Month	Total Workers	Contribution (RM)
January 2023	261	10,548.90
April 2023	297	13,410.90
June 2023	302	12,663.40
<b><u>Flemington Palm Oil Mill</u></b>		
Month	Total Workers	Contribution (RM)
January 2023	101	5,483.30
April 2023	102	6,719.20
May 2023	102	5,767.30
<b><u>Sungai Samak Estate</u></b>		
Month	Total Workers	Contribution (RM)
Nov 2022	223	9,261.90
Feb 2023	259	8,206.30
July 2023	267	9,758.40
<b><u>Sabak Bernam Estate</u></b>		

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		Month	Total Workers	Contribution (RM)	
		January 2023	162	5,542.20	
		April 2023	193	7,442.50	
		June 2023	202	7,810.20	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>Flemington Estate, two accidents occurred resulting in 29 days of Lost Time Injury (LTI). The incident is documented under JKPP 8 - JKPP8/126647/2022, with a date of 11/01/2023.</p> <p>For the Bagan Datoh Estate, five accidents were reported in the year 2022, with 157 days of Lost Time Injuries (LTI) were recorded. This information is documented under Ref No: JKPP8/124535/2022, with a date of 13/01/2023.</p> <p>Flemington Palm Oil Mill has submitted the JKPP 8 form to DOSH dated 20/01/2023 (Ref No: JKPP8/126035/2023, one accident happen with one day LTI recorded.</p> <p>Sungai Samak Estate, 6 accidents were reported in the year 2022, with 468 days of Lost Time Injuries (LTI) were recorded. This information is documented under Ref No: JKPP8/142143/2022, with a date of 30/01/2023.</p> <p>Sabak Bernam Estate, 2 accidents were reported in the year 2022 with 32 days of Lost Time Injuries (LTI) were recorded. This information is documented under JKPP 8 Ref No: JKPP8/115163/2022, with a date of 25/01/2023.</p>			Complied
<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>					
<b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.					
7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.	<p>The estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans.</p> <p>a) The estates had in place documented the IPM plan which</p>			Complied

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	<p>- Critical (Major) compliance -</p>	<p>covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by SOP dated Dec 2016 index no 17.10 title: beneficial plant protocol.</p> <p>b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, along the roadsides and designated points in the fields and also within the nursery perimeter.</p> <p>c) The plan also advocated single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff.</p> <p>All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the Agronomist. Baiting is continued until bait acceptance threshold level.</p>	
<p>7.1.2</p>	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. The estates have declared this compliance in the status of IPM species invasiveness.</p>	<p>Complied</p>
<p>7.1.3</p>	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in SOU 04 Mill and Estates by burning ever since SDPB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> <li>- Compliance to Responsible Agriculture Charter</li> <li>- EQMS-SOP-Section B2 - Under felling/clearing &amp; land preparation</li> </ul> <p>SDP has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in</p>	<p>Complied</p>

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		the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.																							
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																									
7.2.1	<p><b>(C)</b> 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>	There is no change on the written justification in SOPs in which it has been seen and reported in the public summary report last year. The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available as the Sime Darby Plantation Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Berhad. Refer to Sime Darby Plantation Agricultural Reference Manual, Issue No:2 dated June 2021. Selected products are specific to the target pest, weed and disease.	Complied																						
7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>The estate has established the record of pesticides for all field. The a.i per hectare is available for all estate. Sample taken as below.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Month</th> <th>a.i (kg)/hectare</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Flemington</td> <td>Apr 2023</td> <td>0.631</td> </tr> <tr> <td>May 2023</td> <td>0.733</td> </tr> <tr> <td>June 2023</td> <td>0.873</td> </tr> <tr> <td rowspan="3">Bagan Datoh</td> <td>Apr 2023</td> <td>0.269</td> </tr> <tr> <td>May 2023</td> <td>0.344</td> </tr> <tr> <td>June 2023</td> <td>0.311</td> </tr> <tr> <td rowspan="2">Sungai Samak</td> <td>Apr 2023</td> <td>0.158</td> </tr> <tr> <td>May 2023</td> <td>0.409</td> </tr> </tbody> </table>	Estate	Month	a.i (kg)/hectare	Flemington	Apr 2023	0.631	May 2023	0.733	June 2023	0.873	Bagan Datoh	Apr 2023	0.269	May 2023	0.344	June 2023	0.311	Sungai Samak	Apr 2023	0.158	May 2023	0.409	Complied
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			June 2023	0.175	
		Sabak Bernam	Apr 2023	0.213	
			May 2023	0.287	
			June 2023	0.146	
7.2.3	<p><b>(C)</b> 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 quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual (ARM), Section 15 Plant Protection [Issue No. 2, dated June 2021] and Section 16 Weed Control [Issue No. 2, dated June 2021]. The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. The implementation in the field is consistent with the SOP established (Sime Darby Plantation Agricultural Reference Manual, Issue No:2 dated June 2021). Among the IPM plans implemented by the estates were establishment of beneficial plants (e.g., antigonan, tunera and cassia) and barn owl (Tyto alba). Sighted during the site visit at the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</p>			Complied
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>There is no prophylactic use of pesticides in all estates visited.</p>			Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated</p>	<p>The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations.</p>			Complied

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	<p>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"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul> <p>- Minor compliance -</p>	<p>The register showed that only class III &amp; IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p>	
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application. The training was conducted by the personnel with knowledge on pesticide application such as Estate Manager, Asst. Manager and pesticide supplier. Reviewed of training records at Flemington Estate dated 04/08/2023, Bagan Datoh Estate on 25/05/2023, Sungai Samak Estate on 12/06/2023 and 12/06/2023 at Sabak Bernam Estate.</p>	Complied
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>In accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations, the mill and estate's Chemical Store were found to contain stored pesticides. The stores remained locked at all times, and during the visit, the store clerk was observed unlocking the padlock to open the entrance door for the auditor to inspect the store. A prominently displayed sign at the entrance door indicated the requirement to wear personal protective equipment (PPE). The Chemical Store also had signage displaying the necessary Hazard Symbols at the entrance. The facility's ventilation fan was operational, ensuring</p>	Complied



		adequate ventilation. Additionally, an up-to-date chemical register, including the trade and generic names of the stored pesticides, as well as their Safety Data Sheets, were readily available.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	The practice observed involves repurposing all chemical containers as premix containers for transporting diluted chemicals to the fields for application. Alternatively, any unused chemical containers are subjected to a triple rinsing process and subsequently punctured prior to disposal. These punctured containers are then collected by licensed schedule waste collectors for recycling purposes.	Complied
7.2.9	<b>(C)</b> 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. - Critical (Major) compliance -	Pesticide application by aerial spraying is not practiced in SOU 04 SDPB.	Complied
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	<u>Flemington Palm Oil Mill</u> Medical Surveillance Programme has been performed successfully for the year 2023 on 11/07/2023 for the mill workers exposed to hazardous chemicals and fumes. A total of 14 workers have been examined on 11/07/2023 and found that all are fit to work. <u>Flemington Estate</u> Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification as follows; The medical surveillance programme for the year 2023 has been performed on 17/03/2023 at SXXXX DXXXXXXXXX for 18 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers are fit to work. <u>Bagan Datoh Estate</u>	Complied

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		<p>Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification as follows; The medical surveillance programme for the year 2022 has been performed on 21/07/2022 at KIXXXX &amp; SXXXXXX LXX for 35 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers are fit to work. The medical surveillance for the year 2023 has been conducted on 20/07/2023. The management is yet to receive the result of the medical surveillance. The management has followed up through phone call to the vendor, and vendor promises to expedite the process of reporting.</p> <p><u>Sungai Samak Estate</u></p> <p>Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification as follows. The medical surveillance programme for the year 2022 has been performed on 08/12/2022 at Klinik KX TXX for 20 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers are fit to work.</p> <p><u>Sabak Bernam Estate</u></p> <p>Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification as follows. The medical surveillance programme for the year 2023 has been performed on 14/03/2023 at SaXXX DisXXXXXXXXX for 21 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers are fit to work.</p>	
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>All estates have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Sime Darby Plantation – Human Right Statement stated, "Pregnant women and mothers with new-borns are assigned jobs which do not expose</p>	Complied

		<p>them to any occupational hazards, at equal pay.". It was sighted during the visit to the stores there were signage stating that pregnant and breast-feeding women are not allowed to enter the chemical stores. Verification on all estates visited, there were no female workers assigned for chemical related works in the four estates visited.</p> <p>Interviewed with management verified that person under 18 years old will not be working in handling the chemicals, especially spraying. Further verification on the medical restriction, at the moment there are no workers that are affected based from the medical surveillance, however any workers were affected, management will change the job position to suitable work without affecting their pay.</p>										
<p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>												
<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>SOU 04 Flemington Mill and all the 4 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2023 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1151 1027 1912 1369"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle &amp; generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) &amp; boiler quenching water and blow down</td> </tr> </tbody> </table>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	<p>Complied</p>
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<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.          - Minor compliance -</p>	<p>In Flemington POM and the estates in SOU 04, procedure SD/SDP/PSQM (ESH)/203-EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>Management and disposal of waste water 2023 has been established compiled by Assistant Engineer/Assistants/Staff.</p> <p>Waste Management Plan 2023 has been established prepared by QA and verified by the Assistant Engineer/Assistants/Staff.</p> <p>Waste Management Plan 2023 has been established in Jan 2023.</p> <p>Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact Identification (file no: SM/5.2/EAI) improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.</p> <p>Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</p> <p>Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to the following vendors registered with DOE. Used lubricants oil and used batteries were collected by SDI upon completion of every vehicles/engine servicing. DOE has made approval to authorize SDI via letter dated 06/9/2011. DOE letter of authority was sighted and verified.</p> <p>SW 404 are despatched to EdXXXta MXXXXXXXXe Sdn Bhd.</p>	<p>Complied</p>
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Estate	Date	SW 410	SW 409	SW 305	SW 404	SW 306	SW 312
S Samak	28/07/23	-	-	-	-	-	0.020
S Samak	29/05/23	0.170		0.170	-	-	-
S Samak	19/04/23	0.149	0.030	0.210	-	-	0.020
S Samak	17/04/23	-	-	-	0.006	-	-
S Bernam	03/03/23	-	-	-	0.0005	-	-
S Bernam	29/11/22	-	-	-	0.010	-	-
S Bernam	17/03/23	0.007	-	0.096	-	-	-
S Bernam	14/11/23	0.011	-	0.561	-	-	-

Estate	Date	SW 410	SW 409	SW 305	SW 404	SW 306	SW 417
B Datoh	15/06/23	-	-	-	0.0019	-	-
B Datoh	07/02/23	-	-	-	0.001	-	-
B Datoh	25/05/23	0.067	1.039	0.170	-	0.120	-
B Datoh	19/10/22	0.031	0.089	0.155	-	0.290	-
Flemington	15/06/23	-	-	-	0.0005	-	-
Flemington	07/02/23	-	-	-	0.0010		-
Flemington	23/5/23	0.205	0.209	0.050	-	-	0.100

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Flemington	15/12/22	0.096	0.122	0.100	-	-	-
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	Date	SW 410	SW 409	SW 305	SW 110	SW 109	SW 322
FPOM	17/04/23	0.470	0.197	0.190	0.220	0.003	0.050
FPOM	21/10/22	0.336	0.295	0.525	-	0.020	0.050

The CU scheduled waste is disposed to the following vendors registered with DOE.

SW	SW Buyers/Vendor
SW 409, SW 410, SW 110, SW 109	PXXXXs FXXra Sdn Bhd
SW 409, SW 410, SW 110, SW 109	PXXXXs FXXra (Ipoh) Sdn Bhd
SW 305, SW 306, SW 409	SXXe KXXXta Sdn Bhd
SW 409, SW 410, SW 417, SW 110, SW 109, SW 312, SW 322	KXXXXXi AXXm Sdn Bhd
SW 404	EdXXXta MXXXXXXe Sdn Bhd
SW 409	SXX SXXXa TeXXXXXgi EnXXXXXise

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		<p>Empty containers were dispatched to licensed buyer as SW 409 for all estates except for Sabak Bernam Estate disposed empty container to SST Setia Teknologi Enterprise 679 units 18/04/22.</p> <p>Domestic waste for the operating units in SOU 04 was disposed as follows;</p> <table border="1" data-bbox="1205 598 1854 898"> <thead> <tr> <th></th> <th colspan="2">Disposal site</th> <th>Remarks</th> </tr> <tr> <th>Estate</th> <th>Estate</th> <th>External</th> <th></th> </tr> </thead> <tbody> <tr> <td>S Samak</td> <td>-</td> <td>MPTI</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>B Datoh</td> <td>-</td> <td>MPTI</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Flemington</td> <td>-</td> <td>MPTI</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>S Bernam</td> <td>-</td> <td>MPTI</td> <td>Collection by SDE</td> </tr> </tbody> </table> <p>Evidence of collection were verified through the payment made to Majlis Perbandaran Teluk Intan e.g., bill no BDE 03/04/2023 9115 - and FTSB-May23-004 dated 19/05/2023. The estates and mill appoint respective contractors (e.g., TXXXg WXXX EnXXXXXise and FXXX Transport for POM) for the transportation to the municipal landfill (AXXX AXXXi Sdn Bhd) located at Changkat Jong Perak.</p>		Disposal site		Remarks	Estate	Estate	External		S Samak	-	MPTI	Collection 2/3 x week	B Datoh	-	MPTI	Collection 2/3 x week	Flemington	-	MPTI	Collection 2/3 x week	S Bernam	-	MPTI	Collection by SDE	
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7.3.3	<p>The unit of certification does not use open fire for waste disposal.          - Minor compliance -</p>	<p>There was no land preparation in SOU 04 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ol style="list-style-type: none"> <li>EQMS SOP Section-B2 under felling/clearing &amp; land preparation</li> <li>Carbon Policy</li> </ol>	Complied																								



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		<p>As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.</p>	
<p><b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
<p>7.4.1</p>	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.            - Minor compliance -</p>	<p>SOU 04 continued to use and implement SOPs for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs.</p> <ul style="list-style-type: none"> <li>a) Agriculture Reference Manual (ARM) Issue No: 2 dated June 2021,</li> <li>b) Estate Quality Management System (EQMS) Manual dated 01/11/2008,</li> <li>c) Safety Standard Operating Procedures (SSOP) dated 25/02/2015,</li> <li>d) Sustainable Plantation Management System Manual (SPMS),</li> <li>e) "Guidelines On River Management" Manual, ESH Management System Manual dated 01/07/2012,</li> <li>f) Occupational Safety and Health Manual dated 03/03/2008,</li> <li>g) Pictorial Safety Standards and Security Guidelines (PSS).</li> <li>h) Plantations/Mill Quality Management System (PQMS/MQMS) std operating manual</li> </ul> <p>All the estates and mill operations were guided through the manuals and SOPs. The procedures as documented in the Sime Darby Plantation Agriculture Reference Manual were disseminated to the</p>	<p>Complied</p>

		<p>staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs, the bottom-line of which is Responsible Agricultural Charter the care for their safety and health and the environment.</p>																					
<p>7.4.2</p>	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -</p>	<p>Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. For all 4 estates Agronomic assessment and fertiliser recommendation was conducted by Sime Darby Research Plant Nutrition &amp; Protection Unit PNP Northern Region to formulate the 2023 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca &amp; B had been carried out in all estates. The latest being:</p> <table border="1" data-bbox="1205 1098 1839 1331"> <thead> <tr> <th></th> <th>Estate</th> <th>Report Date</th> <th>Report No</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>S Samak Estate</td> <td>21/06/2023</td> <td>SSE2023-24</td> </tr> <tr> <td>2</td> <td>B Datoh Estate</td> <td>02/05/2023</td> <td>P152/2023</td> </tr> <tr> <td>3</td> <td>Flemington Estate</td> <td>07/04/2023</td> <td>P111/2023</td> </tr> <tr> <td>4</td> <td>S Bernam Estate</td> <td>21/03/2023</td> <td>SBE2023-24</td> </tr> </tbody> </table> <p>analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca &amp;</p>		Estate	Report Date	Report No	1	S Samak Estate	21/06/2023	SSE2023-24	2	B Datoh Estate	02/05/2023	P152/2023	3	Flemington Estate	07/04/2023	P111/2023	4	S Bernam Estate	21/03/2023	SBE2023-24	<p>Complied</p>
	Estate	Report Date	Report No																				
1	S Samak Estate	21/06/2023	SSE2023-24																				
2	B Datoh Estate	02/05/2023	P152/2023																				
3	Flemington Estate	07/04/2023	P111/2023																				
4	S Bernam Estate	21/03/2023	SBE2023-24																				

		<p>Exch Mg was carried out on a 5-year cycle basis and last carried out as follows:</p> <table border="1" data-bbox="1211 459 1832 694"> <thead> <tr> <th></th> <th>Estate</th> <th>Report Date</th> <th>Report No</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>S Samak Estate</td> <td>12/10/2018</td> <td>S75/2018</td> </tr> <tr> <td>2</td> <td>B Datoh Estate</td> <td>19/09/2018</td> <td>S64/2018</td> </tr> <tr> <td>3</td> <td>Flemington Estate</td> <td>23/10/2018</td> <td>S88/2018</td> </tr> <tr> <td>4</td> <td>S Bernam Estate</td> <td>02/01/2019</td> <td>S5/2019</td> </tr> </tbody> </table> <p>All foliar and soil sampling &amp; analysis was conducted by Sime Darby Research Plant Nutrition &amp; Protection Unit PNP Northern Region. Soil analysis is made on a 5-year cycle. This year the estates had a resampling soil beginning Mac to Aug 2023 respectively. At the time of audit, the report has yet to be released.</p>		Estate	Report Date	Report No	1	S Samak Estate	12/10/2018	S75/2018	2	B Datoh Estate	19/09/2018	S64/2018	3	Flemington Estate	23/10/2018	S88/2018	4	S Bernam Estate	02/01/2019	S5/2019											
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7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The Estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled, chipped, windowed and left to decompose. Records showed that the estates had applied EFB at 20-40 tons/ha and records showed that EFB metric ton in 2022/23 was as follows:</p> <table border="1" data-bbox="1189 1166 1870 1399"> <thead> <tr> <th></th> <th></th> <th>Field no</th> <th>Ha</th> <th>Mt</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>S Samak</td> <td>P06MB</td> <td>74.10</td> <td>1482.00</td> <td>April - Jun</td> </tr> <tr> <td></td> <td>S Samak</td> <td>P15B</td> <td>87.32</td> <td>1746.40</td> <td>Dec - Feb</td> </tr> <tr> <td>2</td> <td>S Bernam</td> <td>P14D</td> <td>44.00</td> <td>880.00</td> <td>June</td> </tr> <tr> <td>3</td> <td>S Bernam</td> <td>P08A</td> <td>40.30</td> <td>806.00</td> <td>Oct</td> </tr> </tbody> </table>			Field no	Ha	Mt	Month	1	S Samak	P06MB	74.10	1482.00	April - Jun		S Samak	P15B	87.32	1746.40	Dec - Feb	2	S Bernam	P14D	44.00	880.00	June	3	S Bernam	P08A	40.30	806.00	Oct	Complied
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3	S Bernam	P08A	40.30	806.00	Oct																												

			4	B Datoh	P2014B	137.31	2746	Aug		
			5	B Datoh	P2008M	56.07	1121	Jan - May		
			6	Flemington	P2014N	82.26	3290	Jan		
			7	Flemington	P2019A	48.98	1959	Feb- Aug		
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records revealed that the actual fertilizers applied in 2022/23 was in line with the program. The following fertilizers were applied in SOU 04 estates subject to the recommendation by the Agronomist.								Complied
				Fertilizer	Kg/palm	application month				
			1	Borate	0.10	May/Nov				
			2	NK C1/C2	3.00-4.00	Sept/Feb				
			3	R Phosphate	1.75 - 2.00	April /May				
			4	GML	2.50	April				
			5	Kieserite	1.50	April				
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.										
7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows:								Complied

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		<table border="1"> <thead> <tr> <th></th> <th>S Samak</th> <th>S Bernam</th> <th>Flemington</th> <th>B Datoh</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Selangor</td> <td>Bernam,</td> <td>Briah</td> <td>Selangor</td> </tr> <tr> <td>2</td> <td>Briah</td> <td>Briah,</td> <td>Selangor</td> <td>Jawa,</td> </tr> <tr> <td>3</td> <td>Peat</td> <td>Selangor</td> <td>Jawa</td> <td>Bernam,</td> </tr> <tr> <td>4</td> <td>-</td> <td>Unclassified</td> <td>Bernam</td> <td>Kangkong</td> </tr> <tr> <td>5</td> <td>-</td> <td>-</td> <td></td> <td>Sedu,</td> </tr> <tr> <td>6</td> <td>-</td> <td>-</td> <td>-</td> <td>Briah</td> </tr> <tr> <td>7</td> <td>-</td> <td>-</td> <td>-</td> <td>Selangor</td> </tr> <tr> <td>8</td> <td>-</td> <td>-</td> <td>-</td> <td>Tongkang</td> </tr> </tbody> </table> <p>There were 258.40 ha of peat soils identified in Sg. Samak Estate as per Soil Series Map issued by the R&amp;D - TTAS – Precision Agriculture Unit dated March 2019.</p>		S Samak	S Bernam	Flemington	B Datoh	1	Selangor	Bernam,	Briah	Selangor	2	Briah	Briah,	Selangor	Jawa,	3	Peat	Selangor	Jawa	Bernam,	4	-	Unclassified	Bernam	Kangkong	5	-	-		Sedu,	6	-	-	-	Briah	7	-	-	-	Selangor	8	-	-	-	Tongkang	
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7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Like all SDPB Estates, the estates visited in SOU 04 continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> <li>a) Reclassification of conservation set aside (CSA) For Upstream Operations dated 31/05/2019 ref no GSQM/PLS/CSA-GD01</li> <li>b) Land Preparation for Terracing in ARM Manual.</li> </ul> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants</p>	Complied																																													

		<p>and in some mature areas. The cover crop <i>mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps for the titled ha were provided by the R&amp;D Precision Agriculture Unit Sept 2019 with details as follows:</p> <table border="1" data-bbox="1160 545 1848 976"> <thead> <tr> <th></th> <th>Terrain</th> <th>S Samak</th> <th>S Bernam</th> <th>Flemington</th> <th>B Datoh</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-2</td> <td>100.00</td> <td>100.00</td> <td>100.00</td> <td>100.00</td> </tr> <tr> <td>2</td> <td>2-6</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>3</td> <td>6-12</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>12-20</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>5</td> <td>20-25</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>6</td> <td>&gt;25</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td></td> <td>Total</td> <td>100%</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> </tbody> </table>		Terrain	S Samak	S Bernam	Flemington	B Datoh	1	0-2	100.00	100.00	100.00	100.00	2	2-6	-	-	-	-	3	6-12	-	-	-	-	4	12-20	-	-	-	-	5	20-25	-	-	-	-	6	>25	-	-	-	-		Total	100%	100%	100%	100%	
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6	>25	-	-	-	-																																														
	Total	100%	100%	100%	100%																																														
7.5.3	<p>There is no new planting of oil palm on steep terrain.                      - Minor compliance -</p>	<p>This compliance being addressed in the following stating the following among others;</p> <ul style="list-style-type: none"> <li>a) Reclassification of conservation set aside (CSA) For Upstream Operations dated 31/05/2019 ref no GSQM/PLS/CSA-GD01</li> <li>b) Land Preparation for Terracing in ARM Manual.</li> </ul> <p>"Slope of &gt;25 degree to be excluded from any new plantation development and replanting program. For slope &lt;25 degree the existing crop all vegetative shall be maintained accordingly".</p> <p>There is no new planting in the estates in the SOU 4.</p>	Complied																																																
<p><b>Criterion 7.6:</b> 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.</p>																																																			

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7.6.1	<p><b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Soil surveys are made and available in a soil map at the estates. Topographic contour maps are also available which are both used to manage the drainage and road works in the estates. There were 258.40 ha of peat soils identified in Sg. Samak Estate as per Soil Series Map issued by the AAT – Precision Agriculture Unit dated March 2019.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>There were 258.40 ha of peat soils identified in Sg. Samak Estate as per Soil Series Map issued by the AAT – Precision Agriculture Unit dated March 2019. As addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter Revised 2020, under section 3.2:</p> <p>a) Protect and enhance forest: “We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <ul style="list-style-type: none"> <li>i. No new development of peat areas, regardless of depth or location.</li> <li>ii. We will seek to rehabilitate existing plantings on peats where possible.</li> </ul>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Soil surveys are made and available in a soil map at the estates. Topographic contour maps are also available which are both used to manage the drainage and road works in the estates.</p>	Complied
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p><b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting on peat regardless of depth after 15 November 2018 in existing areas.</p> <p>There were 258.40 ha of peat soils identified in Sg. Samak Estate as per Soil Series Map issued by the AAT – Precision Agriculture Unit</p>	Complied

		dated March 2019. No other soil categorized as problematic or fragile soil.	
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>SDPB has conducted peat soil verification at Sg. Samak Estate on 119 – 22/2/2019 and documented in Peat Soil Verification at Sg. Samak Estate for RSPO Compliance dated 1/4/2019.</p> <p>a) The verification was conducted by 2 agronomists from Plantation Research and Advisory. SDPB has inventoried and documented all the peat area 2019 SDPB RSPO Peat Inventory R1.</p> <p>b) The latest submission to RSPO Secretariat has been done on 09/07/2021. Initial submission was made on 14/11/2019.</p> <p>As per report, total area planted on peat in Sg. Samak Estate recorded at 258.40 ha.</p>	Complied
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>Sg. Samak Estate have 258.40 ha of peat area in Yiew Lian Division. The estate has established the Water Management Plan for Peat Area. The management plan was reviewed on annually basis. The monitoring of peat soil subsidence was guided by the following;</p> <p>a) Item 2 – Optimal Water Levels for Coastal/Peat Soil and</p> <p>b) Item 4 – Water-table monitoring of Chapter 10 of Sime Darby Agricultural Reference Manual – Water Management in Coastal and Peat Plantings.</p> <p>c) Guidance in the “Peat Subsidence Gauge Installation SOP” dated 14/03/2016.</p> <p>The estate monitored water levels using water level markers in drains and water tubes for ground water levels. Records relating to peat management dated 20/07/2023 as follows;</p>	Complied



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	Field no	tube no	<45 cm	45-60 cm	61-90 cm	91-120 cm
1	2016A	1	-	-	/	-
2	2015A	4	-	-	/	-
3	2015B	7	-	-	/	-
4	2014A	10	-	-	/	-
5	2014B	11	-	-	/	-
6	2011A	13	-	-	/	-
7	2002D1	15	-	/	-	-
8	2004DA	16	-	/	-	-
9	2004D	17	-	/	-	-
10	2005D	18	-	/	-	-
11	2005DA	20	-	/	-	-
12	2017A	21	-	/	-	-
13	2017B	22	-	/	-	-
14	2004M	24	-	-	/	-
15	2007MA	26	-	-	/	-
16	2006M	28	-	-	/	-
17	2008M	29	-	-	/	-

There are map showing location of peat subsidence pole at P01B / P02D & with a total 5 piezometer. The peat subsidence monthly monitoring among others as follows sighted sample date 08/01/2023.

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		Issue / Area	Management Plan	PIC	Date		
		1	Water level	To maintain water level 40-60 cm on weekly basis	Div Staff/AM	On-going	
		2	Flushing Out	Releasing water during rainy period.	Div Staff/AM	On-going	
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the Sime Darby Plantation Agricultural Reference Manual (Water Management in Coastal and Peat lands Issue No: 2 dated June 2021. Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following;</p> <ul style="list-style-type: none"> <li>a) Monitor the quality of main water inlet/outlet for pollutants from estate’s operations.</li> <li>b) Contingency during water shortage.</li> <li>c) Field water management - side pit construction</li> <li>d) Adequate field drains</li> <li>e) Reuse/recycle wastewater.</li> <li>f) Peat soil water management</li> </ul> <p>Management strategy for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils) is based on the established ARM, section 10: Water Management In Coastal and Peat Plantings.</p> <p>There were 2 management strategies;</p> <ul style="list-style-type: none"> <li>a) optimal water level monitoring</li> </ul>				Complied	

		<p>b) and flushing of acid rainwater.</p> <p>Verified management plan for 2023 at Sungai Samak Estate as per criteria 7.7.3. The latest water table was on 20/06/2023, as per monitoring record they maintain water level at 69-90 cm: Sighted record monitoring the water measurement point with details stated in 7.7.3.</p>										
<p>7.7.5</p>	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>As per latest review on Long Range Replanting Program, the peat area at 116.57 ha were scheduled to be replanted on 2023. The drainability assessment have been conducted on 9 July 2021, and result showed that the area can be replanted</p> <p>According to Siong 2004, "Drainability is defined as the technical feasibility of sustainable drainage by gravity the excess water from the basin peat swamps". This definition was supported by Melling et al 2007, whereby "sustainable drainability in peat soil area, can only be achieved if the mineral subsoil level is above the mean water level at the drainage discharge point." drainability has been classified as follows:</p> <table border="1" data-bbox="1137 965 1930 1327"> <thead> <tr> <th>Class</th> <th>Status</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Good</td> <td>Excess water in the field can be drained by gravity even during the highest tide and/or during the wet periods.</td> </tr> <tr> <td>2</td> <td>Moderately Good</td> <td>Excess water in the field can be drained by gravity &gt;50% of the tidal cycle, sometimes with the help of bunds and flap-gates and/or where water in the plantation can be drained during the wet period before the oil palms start to suffer.</td> </tr> </tbody> </table>	Class	Status	Remark	1	Good	Excess water in the field can be drained by gravity even during the highest tide and/or during the wet periods.	2	Moderately Good	Excess water in the field can be drained by gravity >50% of the tidal cycle, sometimes with the help of bunds and flap-gates and/or where water in the plantation can be drained during the wet period before the oil palms start to suffer.	<p>Complied</p>
Class	Status	Remark										
1	Good	Excess water in the field can be drained by gravity even during the highest tide and/or during the wet periods.										
2	Moderately Good	Excess water in the field can be drained by gravity >50% of the tidal cycle, sometimes with the help of bunds and flap-gates and/or where water in the plantation can be drained during the wet period before the oil palms start to suffer.										

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		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; text-align: center;">3</td> <td style="width: 15%; text-align: center;">Poor</td> <td>Excess water in the field can be drained by gravity &lt;50% of the tidal cycle and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to buffer.</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">Very Poor</td> <td>Excess water in the field cannot be drained by gravity even at lowest tide and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to die.</td> </tr> </table> <p>Based on the above classification, on SOU 04 is in class 1 and concluding in this report the peat areas in Sg Samak Estate can be replanted. In a revised announcement through an email dated 17/05/2023 from Group Sustainability - Conservation &amp; Biodiversity Unit of SDP another drainability assessment (DA - by PLWG Peat Land Working Group) report has been submitted to RSPO secretariat in April 2023, the estate was directed to uphold the replanting program for the planned area. The decision may take up to 2 years for approval. The estate has since this directive has abide by the decision. This was witnessed at site and verified that no replanting activities have been made.</p>	3	Poor	Excess water in the field can be drained by gravity <50% of the tidal cycle and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to buffer.	4	Very Poor	Excess water in the field cannot be drained by gravity even at lowest tide and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to die.	
3	Poor	Excess water in the field can be drained by gravity <50% of the tidal cycle and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to buffer.							
4	Very Poor	Excess water in the field cannot be drained by gravity even at lowest tide and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to die.							
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There were no other fragile soils other than peat soils as mentioned under indicator 7.7.3. The management strategy in place for peat soil was guided by;</p> <ul style="list-style-type: none"> <li>a) Item 2 – Optimal Water Levels for Coastal/Peat Soil and</li> <li>b) Item 4 – Water-table monitoring of Chapter 10 of Sime Darby Agricultural Reference Manual – Water Management in Coastal and Peat Plantings.</li> <li>c) Guidance in the "Peat Subsidence Gauge Installation SOP" dated 14/03/2016.</li> </ul>	Complied						

		The estates monitored water levels using water level markers in drains and water tubes for ground water levels.													
7.7.7	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	There is only 258.40 ha of peat soil series available as identified in Sg Samak Estate as identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. There is no other area of peat series or set-aside peat lands within the managed areas.	Complied												
<b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.															
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>SOU 04 Mill /estates had established its Water Management Plan 2023 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <p>a) Implementation of rain water harvest,</p> <p>b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level.</p> <p>c) daily monitoring of bund / scheduled maintenance</p> <p>d) Establishment of <i>mucuna bracteata</i> to prevent erosion,</p> <p>e) Side drain at field road to control water, frond stacking,</p> <p>f) Enhancement of ground vegetation at bare ground area.</p> <p>The water sources are as shown below:</p> <table border="1"> <thead> <tr> <th>Water source</th> <th>Usage</th> <th>Monitoring &amp; measurement</th> <th>Freq</th> <th>PIC</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Water source	Usage	Monitoring & measurement	Freq	PIC	Review status							Complied
Water source	Usage	Monitoring & measurement	Freq	PIC	Review status										

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		1	LAP/ SYAB AS	Purchased for domestic consumption	Monitoring water supply	Mth	AM Mgr	Liaison with Authority
		2	Rainwater	Domestic use Workshop Chemical mixing	Rain fall data	On-going	AM Mgr	Water harvesting for general washing
		3	Water tank	Emergency water supply	-	-	AM Mgr	Request water supply from other estates
		The contingency plan during water shortage						
			Area/ incident	Action steps		PIC	Status	
		1	Water shortage/ prolonged dry season	To obtain water from local authority /Mill catchment To train/educate staff/workers to conserve water To seek assistance from local authority		Manager AM/ Mill Engineer	As and when required	

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				To obtain treated water supply from mill's WTP															
		2	Severe water pollution/ Contamination	To obtain water from LAP To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP	Manager AM/ Mill Engineer	As and when required													
<p>The Estates had implemented water managements plans which covered:</p> <ul style="list-style-type: none"> <li>a) Water shortage contingencies</li> <li>b) Water pollution prevention</li> <li>c) Reduce wastage</li> <li>d) Identification &amp; management of waste waters</li> <li>e) Monitoring rainfall</li> <li>f) Regular water quality analysis.</li> </ul> <p>Water management plan review date was sighted and verified with records as follows;</p>																			
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		4	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going
		5	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going
		6	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going
The Mill Identification & Management of Wastewater						
			location	Wastewater produced	Treatment/containment	Reuse/recycle/disposal method
		1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system
		2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain
			Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain
		3	Engine room	Steam condensate, turbine cooling water	Monsoon drain,	Monsoon drain

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				recycled tank																				
		4	Lab	Cleaning water	Process drain	Monsoon drain																		
		5	Wash room	Toilet water, cleaning water	Septic tank	Collection by licensed contractor.																		
7.8.2	<p><b>(C)</b> 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 estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy (Responsible Agriculture Charter) to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Reclassification of conservation set aside (CSA) for Upstream Operations dated 31/05/2019. The buffer zones established are as follows:</p> <table border="1" style="width: 100%;"> <thead> <tr> <th></th> <th>Estate</th> <th>Buffer zone area</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>S Samak Est</td> <td>Sg Cawang / Sg Dua /Sg Erong</td> </tr> <tr> <td>2</td> <td>B Datoh Est</td> <td>Water steam P17A /P15A</td> </tr> <tr> <td>3</td> <td>Flemington Est</td> <td>Bund Bernam River</td> </tr> <tr> <td>4</td> <td>S Bernam Est</td> <td>Sg Bernam River Reserve</td> </tr> <tr> <td>5</td> <td>Flemington Mill</td> <td>Water Catchment</td> </tr> </tbody> </table>					Estate	Buffer zone area	1	S Samak Est	Sg Cawang / Sg Dua /Sg Erong	2	B Datoh Est	Water steam P17A /P15A	3	Flemington Est	Bund Bernam River	4	S Bernam Est	Sg Bernam River Reserve	5	Flemington Mill	Water Catchment	Complied
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The signboards were displayed accordingly at the site where applicable. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:

	River width	Buffer zone		River width	Buffer zone
1	> 40 m	50 m	4	5 - 10 m	10 m
2	20 - 40 m	40 m	5	< 5 m	5 m
3	10 - 20 m	20 m	-	-	-

among others, parameters are;

	parameter	Standard		Parameter	standard
1	pH	6-9	4	SS	50
2	BOD	3	5	AN	0.3
3	COD	25	6	DO	5-7

	parameter	Standard		Parameter	standard
1	Aldrin	0.02 ppb	5	Heptachlor	0.05 ppb
2	Dieldrin	0.02 ppb	6	lindane	2 ppb
3	t-DDT	0.1 ppb	7	endosulfan	10 ppb
4	BHC	2 ppb	8	Chlordane	0.08 ppb

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	Estate	Buffer zone area
1	S Samak Est	Sg Cawang / Sg Dua /Sg Erong
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Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Among others, parameters are as shown above.

Among others, management plan taken as following:

1. Regular inspection at buffer/HCV areas
2. Monitor water from surrounding areas
3. Track, measure and report all activities around river
4. Train and educate workers.

The sampling sites taken as follows. There were no major issues on the water quality. Variation if any is investigated as per the SOP River Reserve Management (Reclassification of conservation set aside (CSA) for Upstream Operations dated 31/05/2019.

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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>Based on Jadual Pematuhan FPOM disposed effluent on water discharge final point exit to Sg Dulang via Flemington Estate field. Sighted quarterly report has been submitted to DOE (license no 004234 01/07/2023 - 30/06/2024) by quarterly basis. Submission for to DOE on Nov for period Oct - Dec 2022. Among others the indicators were:</p> <table border="1"> <thead> <tr> <th></th> <th>Oct – Dec 22</th> <th>STD</th> <th>06/10/22</th> <th>09/11/22</th> <th>07/12/22</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>9.25</td> <td>9.17</td> <td>8.65</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>100</td> <td>57</td> <td>45</td> <td>32</td> </tr> <tr> <td>3</td> <td>A Nitrogen</td> <td>150</td> <td>10</td> <td>8</td> <td>7</td> </tr> <tr> <td>4</td> <td>Total N</td> <td>200</td> <td>52</td> <td>76</td> <td>61</td> </tr> <tr> <td>5</td> <td>Oil &amp; Grease</td> <td>50</td> <td>7</td> <td>3</td> <td>6</td> </tr> <tr> <td>6</td> <td>Total Solids</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>		Oct – Dec 22	STD	06/10/22	09/11/22	07/12/22	1	pH	5-9	9.25	9.17	8.65	2	BOD mg/l	100	57	45	32	3	A Nitrogen	150	10	8	7	4	Total N	200	52	76	61	5	Oil & Grease	50	7	3	6	6	Total Solids	-	-	-	-	Complied
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.          - Minor compliance -</p>	<p>The mill processing water are obtained from the LAP and water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis. The usage in 2022 is as follows;</p> <table border="1" data-bbox="1227 671 1839 1367"> <thead> <tr> <th></th> <th>Month</th> <th>Water/mt</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr><td>1</td><td>Jan</td><td>8061</td><td>6240</td><td>1.29</td></tr> <tr><td>2</td><td>Feb</td><td>14168</td><td>13468</td><td>1.05</td></tr> <tr><td>3</td><td>Mac</td><td>13644</td><td>14495</td><td>0.94</td></tr> <tr><td>4</td><td>Apr</td><td>14302</td><td>12640</td><td>1.13</td></tr> <tr><td>5</td><td>May</td><td>12920</td><td>9294</td><td>1.39</td></tr> <tr><td>6</td><td>Jun</td><td>8416</td><td>5342</td><td>1.58</td></tr> <tr><td>7</td><td>July</td><td>29101</td><td>13384</td><td>2.17</td></tr> <tr><td>8</td><td>Aug</td><td>16339</td><td>12849</td><td>1.27</td></tr> <tr><td>9</td><td>Sep</td><td>16921</td><td>12155</td><td>1.39</td></tr> <tr><td>10</td><td>Oct</td><td>17980</td><td>12037</td><td>1.49</td></tr> <tr><td>11</td><td>Nov</td><td>12917</td><td>9278</td><td>1.39</td></tr> <tr><td>12</td><td>Dec</td><td>17283</td><td>14340</td><td>1.21</td></tr> <tr><td></td><td>Total</td><td>221445</td><td>135523</td><td>1.34</td></tr> </tbody> </table>		Month	Water/mt	FFB /mt	Water /FFB	1	Jan	8061	6240	1.29	2	Feb	14168	13468	1.05	3	Mac	13644	14495	0.94	4	Apr	14302	12640	1.13	5	May	12920	9294	1.39	6	Jun	8416	5342	1.58	7	July	29101	13384	2.17	8	Aug	16339	12849	1.27	9	Sep	16921	12155	1.39	10	Oct	17980	12037	1.49	11	Nov	12917	9278	1.39	12	Dec	17283	14340	1.21		Total	221445	135523	1.34	Complied
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		<p>A slightly higher water usage noted, due to the proportionate reduction in volume of FFB being processed. There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.</p>																	
<b>Criterion 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised																			
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report 2023. The document was reviewed/updated on Jan 2023. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1" data-bbox="1137 778 1921 1264"> <thead> <tr> <th></th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</td> </tr> <tr> <td>3</td> <td>Electrical supply</td> <td>To reduce reliance on gen-sets for power supply</td> <td>Utilization of TNB sources</td> </tr> </tbody> </table> <p>The utilization of fossil fuel in 2022 is being monitored with records shown below in Diesel L/FFB mt:</p>		Target	Objective	Action plan	1	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.	3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources	Complied
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Mth	SSE	BDE	SBE	FE	FPOM
Jan	1.09	2.48	3.84	3.77	0.14
Feb	0.89	1.92	2.90	1.27	0.08
Mac	0.97	2.08	3.27	1.55	0.09
Apr	0.85	1.75	4.20	1.91	0.11
May	0.99	1.68	2.91	1.51	0.08
Jun	0.94	1.90	3.54	1.33	0.10
July	1.09	1.97	3.10	1.32	0.08
Aug	0.78	1.85	3.77	1.28	0.08
Sep	0.98	2.18	2.74	1.90	0.07
Oct	0.93	1.92	3.10	2.92	0.07
Nov	2.38	2.30	5.84	2.43	0.09
Dec	1.96	2.19	7.25	3.12	0.11
Total	51395	97175	108980	57209	12175

The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.

Performance variation in view of several factors i.e.

- a) Infrastructure of estates,
- b) Community size / no of gen-sets,
- c) No. of vehicles / age of machine.
- d) Weather interference / crop production volume

There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy



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		<p>production in replacement of fossil fuel with the current technology limitation.</p> <p><u>Flemington POM and SOU 04 Estates</u></p> <p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2023 identified in the following:</p> <ul style="list-style-type: none"> <li>a) Environmental Aspect Identification Summary FY 2023 reviewed accordingly.</li> <li>b) Environmental Impact Evaluation Summary FY 2023 reviewed accordingly.</li> </ul> <p>Renewable energy usage &amp; diesel consumption 2021 was established and monitored by monthly basis. Among others effort to reduce diesel usage includes the following:</p> <ul style="list-style-type: none"> <li>1. By maintenance of the boiler &amp; machinery to ensure at optimum level,</li> <li>2. to monitor diesel usage, provide training to workers regarding reduce fuel and diesel usage for boiler.</li> </ul>	
<p><b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 04 Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <ul style="list-style-type: none"> <li>a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adversely impact the environment.</li> </ul>	Complied

		Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.										
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	SOU 04 has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. There is no new development within the SOU 04 estates.	Complied									
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1137 1027 1921 1361"> <thead> <tr> <th></th> <th>Environmental Receptors</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Air emissions –from boiler stack (smoke &amp; particulate), vehicle &amp; generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification</td> </tr> </tbody> </table>		Environmental Receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification	Complied
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				waste) & boiler quenching water and blow down	
		3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes generated from clinics.	
<p>Flemington Mill conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS was found to be in functional condition. Data from the stack is connected online to DOE’s office. Boiler smoke emission data are within the DOE limit.</p> <p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> <p>‘Pollution prevention plan and waste management action plan’ is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among of action has been taken by CU were:</p> <p>a) Scheduled wastes – were disposed through Kualiti Alam Pentas Flora Sdn Bhd, Sime Darby Industrial, Edgenta Mediserve Sdn Bhd (SW404). Domestic wastes are disposed at Majlis Perbandaran Teluk Intan landfill 2/3x a week accumulated at designated area located far from housing complexes and waterways for all estates and mill.</p> <p>Full compliance to zero burning practices.</p>					
<p><b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area</p>					

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7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in SOU 04 and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> <li>a) EQMS-SOP-Section B2 - Under felling/clearing &amp; land preparation</li> <li>b) Carbon Policy</li> </ul> <p>As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -</p>	<p>This is established in the following among others:</p> <ul style="list-style-type: none"> <li>a) <i>Pencegahan dan Langkah Kawalan Kebakaran di SDPB</i></li> <li>b) <i>Larangan melakukan pembakaran terbuka di kawasan SDPB</i></li> <li>c) <i>Pemantauan Kawasan Hotspot</i></li> <li>d) 5km radius zero burning commitment</li> <li>e) ERP procedure</li> </ul> <p>Therein containing</p> <ul style="list-style-type: none"> <li>i. Objective</li> <li>ii. Activity and prevention.</li> <li>iii. Function of Fire and Rescue Team</li> <li>iv. Emergency Evacuation Plan / Drill</li> </ul> <p>The procedure was formalized by RSQM/GSD for use in all operating units in SDPB Estates and mills. Training related to fire drill / prevention are conducted annually.</p>	Complied

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7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Both the estates and the mill in SOU 04 held engagement with the adjacent stakeholders via briefing sessions during the stakeholders meeting. Among others slides relating to</p> <ul style="list-style-type: none"> <li>a) <i>Pencegahan dan Langkah Kawalan Kebakaran di SDPB</i></li> <li>b) <i>Larangan melakukan pembakaran terbuka di kawasan SDPB</i></li> <li>c) <i>Pemantauan Kawasan Hotspot</i></li> <li>d) 5km radius zero burning commitment</li> <li>e) Compliance to Responsible Agriculture Charter Revised 2020</li> <li>f) <i>Program Simulasi Kebakaran</i> Lampiran A Fire Prevention and Control Measure.             <ul style="list-style-type: none"> <li>i. Objective</li> <li>ii. Activity and prevention.</li> <li>iii. Function of Fire and Rescue Team</li> <li>iv. Emergency Evacuation Plan / Drill</li> <li>v. Compliance to related legislative requirement</li> </ul> </li> </ul> <p>All stakeholders being briefed in the respective stakeholders meetings. This is inclusive on the fire prevention and control measures akin to the earlier session in meetings.</p>	Complied																								

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<b>Criterion 7.12:</b> 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><b>(C)</b> 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>	<p>The audit findings have confirmed that there is no new planting (refer 7.7.1 to 7.7.3). Hence, the requirement under this indicator does not apply.</p>			Complied																									
7.12.2	<p><b>(C)</b> 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>The HCV re-assessment was compiled by PSQM team on Sept 2016 for Estates of SOU 04. Thereafter being reviewed on July 2020. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ul style="list-style-type: none"> <li>a) Overview of HCV assessment</li> <li>b) Description of assessment area               <ul style="list-style-type: none"> <li>- Landscape context</li> <li>- biodiversity &amp; conservation values</li> <li>- ecosystem service / social &amp; cultural values</li> </ul> </li> <li>c) HCV criteria &amp; application to agriculture               <ul style="list-style-type: none"> <li>- Visual observation &amp; supporting information</li> </ul> </li> </ul>			Complied																									

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<p><b>PROCEDURAL NOTE:</b> Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> <li>- Wildlife in plantation</li> <li>- decision on HCV status</li> <li>d) HCV management / Monitoring.</li> </ul> <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the estates within SOU 04 are given below;</p> <table border="1" style="width: 100%; border-collapse: collapse; margin: 10px 0;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 65%;">Area</th> <th style="width: 10%;">Site</th> <th style="width: 10%;">Ha</th> <th style="width: 10%;">Type</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bund Bernam River</td> <td>FE</td> <td>0.20</td> <td>HCV 4</td> </tr> <tr> <td>2</td> <td>Mill Water Catchment</td> <td>FE</td> <td>7.18</td> <td>HCV 4</td> </tr> <tr> <td>3</td> <td>Bund Perak River</td> <td>BDE</td> <td>2.00</td> <td>HCV 4</td> </tr> <tr> <td>4</td> <td>Bernam River Reserve</td> <td>SBE</td> <td>1.24</td> <td>HCV 4</td> </tr> <tr> <td>5</td> <td>Sg Erong/Sg Chawang/Sg Dua Reserve</td> <td>SSE</td> <td>7.32</td> <td>HCV 4</td> </tr> <tr> <td>6</td> <td>Pond</td> <td>SSE</td> <td>0.49</td> <td>HCV 4</td> </tr> <tr> <td></td> <td>Total</td> <td></td> <td>18.43</td> <td></td> </tr> </tbody> </table> <p>All areas were sighted and verified. Hectare for the re-categorized areas has not affected the others category including the planted areas. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.</p>		Area	Site	Ha	Type	1	Bund Bernam River	FE	0.20	HCV 4	2	Mill Water Catchment	FE	7.18	HCV 4	3	Bund Perak River	BDE	2.00	HCV 4	4	Bernam River Reserve	SBE	1.24	HCV 4	5	Sg Erong/Sg Chawang/Sg Dua Reserve	SSE	7.32	HCV 4	6	Pond	SSE	0.49	HCV 4		Total		18.43	
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		The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU 04 estates. Hence the current HCV assessment of the estates remains valid.									
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable	Not Applicable								
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The HCV re-assessment was compiled by PSQM team on Sept 2016 for Estates of SOU 04. Thereafter being reviewed on July 2020. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ul style="list-style-type: none"> <li>e) Overview of HCV assessment</li> <li>f) Description of assessment area <ul style="list-style-type: none"> <li>- Landscape context</li> <li>- biodiversity &amp; conservation values</li> <li>- ecosystem service / social &amp; cultural values</li> </ul> </li> <li>g) HCV criteria &amp; application to agriculture <ul style="list-style-type: none"> <li>- Visual observation &amp; supporting information</li> <li>- Wildlife in plantation</li> <li>- decision on HCV status</li> </ul> </li> <li>h) HCV management / Monitoring.</li> </ul> <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the estates within SOU 04 are given below;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Area</th> <th style="width: 10%;">Site</th> <th style="width: 10%;">Ha</th> <th style="width: 30%;">HCV Type</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Area	Site	Ha	HCV Type					Complied
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7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	The audit findings have confirmed that there is no rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018 in SOU 04 estates. Hence, the requirement under this indicator does not apply.						Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	The HCV re-assessment was compiled by PSQM team on Sept 2016 for Estates of SOU 04. Thereafter being reviewed on July 2020. The report therein contained information relating to HCV identification and management. The details among others as extracted below. i) Overview of HCV assessment j) Description of assessment area - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values k) HCV criteria & application to agriculture - Visual observation & supporting information - Wildlife in plantation - decision on HCV status l) HCV management / Monitoring.  All the HCVs were maintained by the management of estates and mill. This exercise has taken into consideration all aspects of						Complied

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		<p>environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented.          No RTE species identified in the estates visited as per Addendum to High conservation value, Final Report for Strategic Operating Unit 4, ver. 2.0 dated July 2020. The monitoring was done monthly by respective estates.</p>																
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.          - Minor compliance -</p>	<p>The CU management has established a standard monitoring document. Details provided include the following information;</p> <ul style="list-style-type: none"> <li>a) Area</li> <li>b) Field no and GPS coordinate</li> <li>c) Observation             <ul style="list-style-type: none"> <li>- Encroachment /sign of trespassing</li> <li>- Wildlife issues/conflicts/sighting</li> <li>- Pollution /erosion issues</li> </ul> </li> <li>d) Maintenance of signage / fence</li> </ul> <p>The monitoring being made by the AP during the security rounds in the estate complex. The field staff/Assistant also played a role in providing information during their daily rounds in the fields. Records furnished by the APs were sighted and verified.</p> <table border="1" data-bbox="1155 986 1910 1254"> <thead> <tr> <th></th> <th>Action steps</th> <th>Action Plan</th> <th>Date</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Inspection of HCV</td> <td>Continuous inspection and recommendation To liase with related agency</td> <td>On-going</td> <td>Estate mgmt</td> </tr> <tr> <td>2</td> <td>Protection or conservation &amp; monitoring of biodiversity area.</td> <td>To continuously collaborate with R&amp; D to monitor the status &amp; health of trees</td> <td>On-going</td> <td>Estate mgmt</td> </tr> </tbody> </table>		Action steps	Action Plan	Date	PIC	1	Inspection of HCV	Continuous inspection and recommendation To liase with related agency	On-going	Estate mgmt	2	Protection or conservation & monitoring of biodiversity area.	To continuously collaborate with R& D to monitor the status & health of trees	On-going	Estate mgmt	Complied
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		<table border="1"> <tr> <td data-bbox="1153 368 1191 539">3</td> <td data-bbox="1191 368 1384 539">Protection &amp; conservation of mangrove forests area.</td> <td data-bbox="1384 368 1713 539">To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.</td> <td data-bbox="1713 368 1807 539">On-going</td> <td data-bbox="1807 368 1908 539">Estate mgmt</td> </tr> <tr> <td data-bbox="1153 539 1191 655">5</td> <td data-bbox="1191 539 1384 655">Rehabilitation &amp; habitat enhancement</td> <td data-bbox="1384 539 1713 655">To participate in tree planting divers tree species to enhance the surrounding biodiversity.</td> <td data-bbox="1713 539 1807 655">On-going</td> <td data-bbox="1807 539 1908 655">Estate mgmt</td> </tr> <tr> <td data-bbox="1153 655 1191 858">6</td> <td data-bbox="1191 655 1384 858">Interface with animals</td> <td data-bbox="1384 655 1713 858">Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with <i>Jabatan Perhilitan</i> on wildlife encounter/discovery</td> <td data-bbox="1713 655 1807 858">On-going</td> <td data-bbox="1807 655 1908 858">Estate mgmt</td> </tr> <tr> <td data-bbox="1153 858 1191 1066">7</td> <td data-bbox="1191 858 1384 1066">Education and awareness</td> <td data-bbox="1384 858 1713 1066">Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming</td> <td data-bbox="1713 858 1807 1066">On-going</td> <td data-bbox="1807 858 1908 1066">Estate mgmt</td> </tr> </table> <p data-bbox="1137 1082 1928 1204">No RTE species identified in the estate visited as per Addendum to High conservation value, Final Report for Strategic Operating Unit 4, ver. 2.0 dated July 2020. The monitoring was done monthly by respective estates.</p>	3	Protection & conservation of mangrove forests area.	To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.	On-going	Estate mgmt	5	Rehabilitation & habitat enhancement	To participate in tree planting divers tree species to enhance the surrounding biodiversity.	On-going	Estate mgmt	6	Interface with animals	Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with <i>Jabatan Perhilitan</i> on wildlife encounter/discovery	On-going	Estate mgmt	7	Education and awareness	Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming	On-going	Estate mgmt	
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7	Education and awareness	Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming	On-going	Estate mgmt																			
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 04 estates. Hence, the requirement under this indicator does not apply.</p>	Complied																				

**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2022 for Flemington POM and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted 2022 for Flemington POM and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	2.03
PKO	2.03

Extraction	%
OER	19.30
KER	4.42

Production	t/yr
FFB Process	135,522.00
CPO Produced	26,147.47
PKO Produced	5,996.73

Land Use	Ha
OP Planted Area	23,151.50
OP Planted on peat	258.40
Conservation (forested)	0.00
Conservation (non-forested)	0.00
<b>Total</b>	<b>23,409.90</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	86,630.15	0.65	3,150.98	0.88	-	-	89,781.13	0.66
CO <sub>2</sub> Emission from fertilizer	12,530.81	0.09	335.70	0.09	-	-	12,866.52	0.09
NO <sub>2</sub> Emission	1,611.09	0.01	-	-	-	-	1,611.09	0.01
Fuel Consumption	6,666.22	0.05	178.39	0.05	-	-	6,844.61	0.05
Peat Oxidation	879.16	0.01	22.71	0.01	-	-	901.87	0.01
<b>Sink</b>								
Crop Sequestration	-82,113.89	-0.62	-2,967.99	-0.83	-	-	-85,081.88	-0.63
Conservation Sequestration	-	-	-	-	-	-	-	-
<b>Total</b>	<b>37,954.58</b>	<b>0.29</b>	<b>719.80</b>	<b>0.20</b>	<b>-</b>	<b>-</b>	<b>38,674.37</b>	<b>0.29</b>

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	26,784.79	0.20
Fuel Consumption	37.99	-
Grid Electricity Utilization	417.50	-
<b>Credit</b>		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
<b>Total</b>	<b>27,240.28</b>	<b>0.20</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

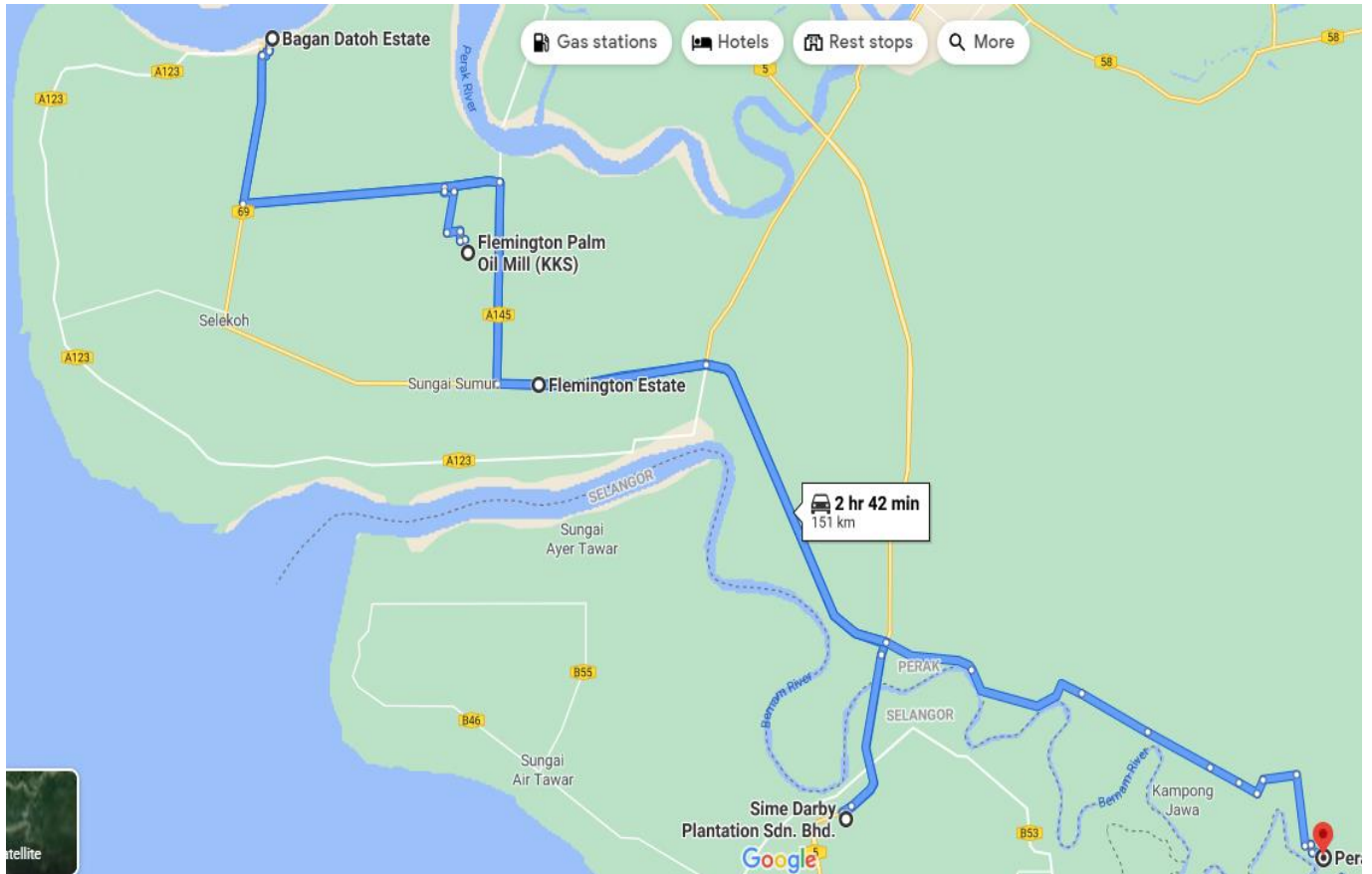
Emissions	tCO <sub>2</sub> e
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
<b>Total Crusher emissions</b>	<b>-</b>

\*This mill has no kernel crusher operation.

<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	-
Divert to anaerobic diversion (%)	100

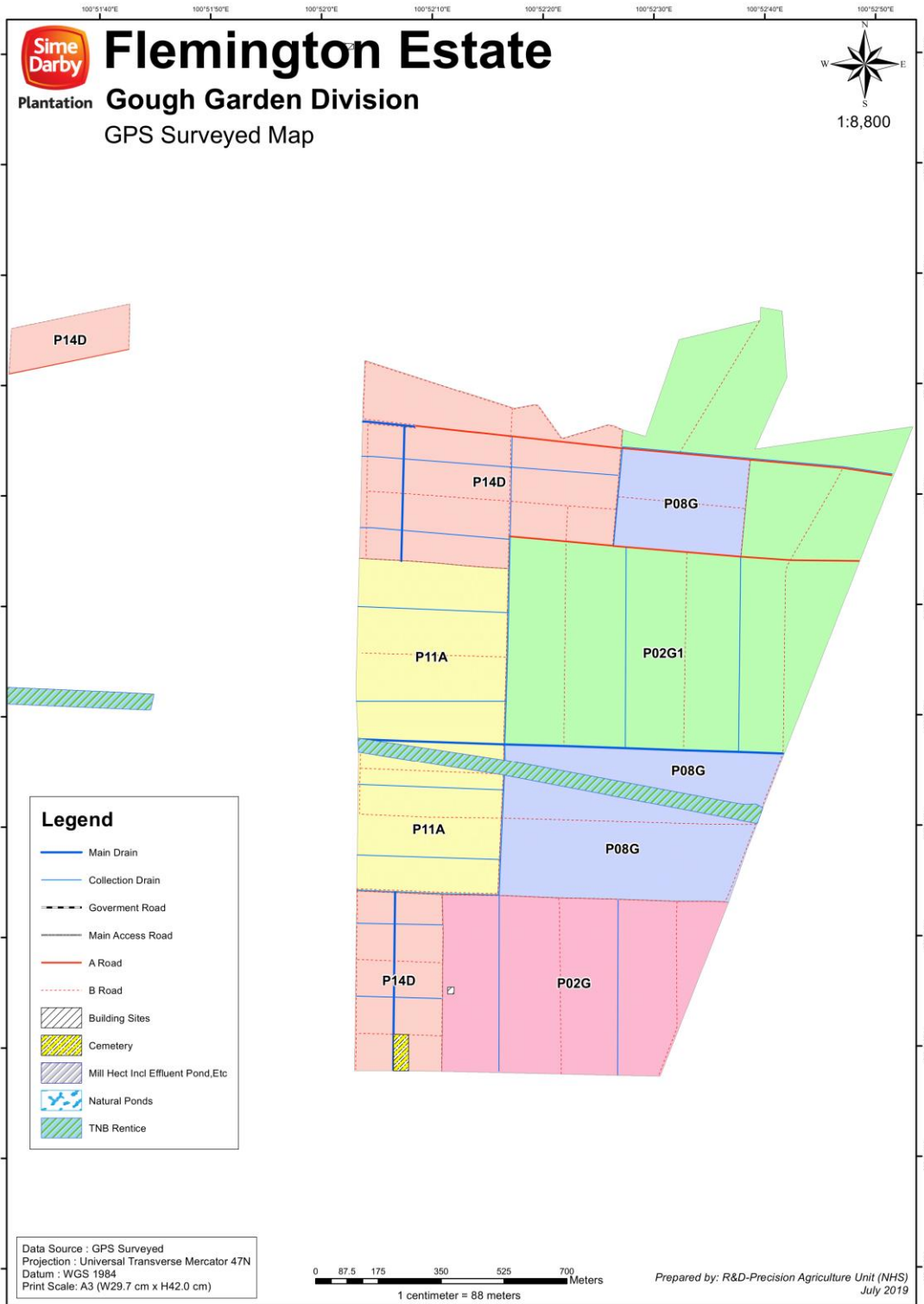
<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	-
Divert to methane captured (energy generation) (%)	-

**Appendix C: Location Map of Certification Unit and Supply bases**



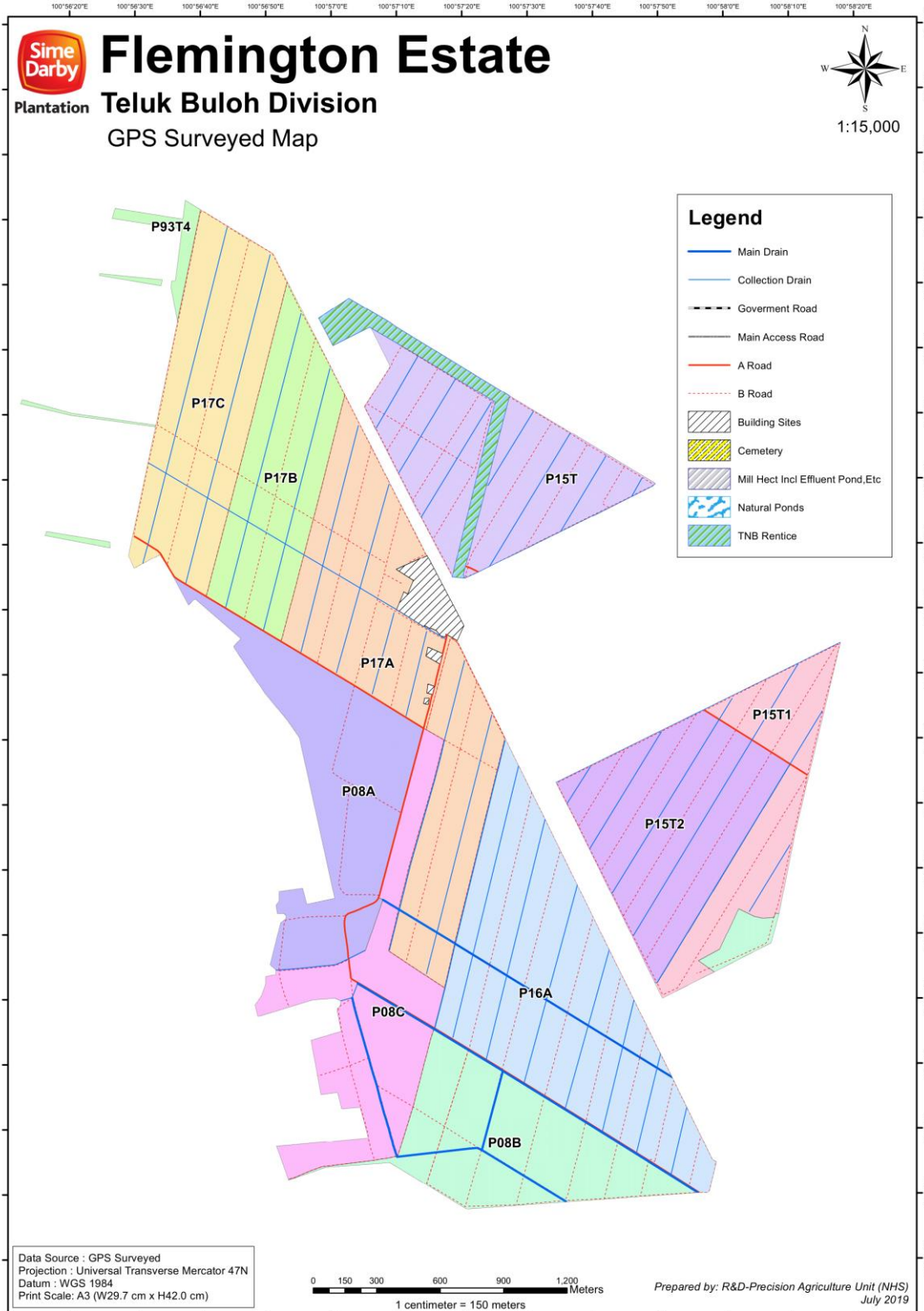
**Appendix D: Estate Field Map**

Flemington Estate: Div. 1

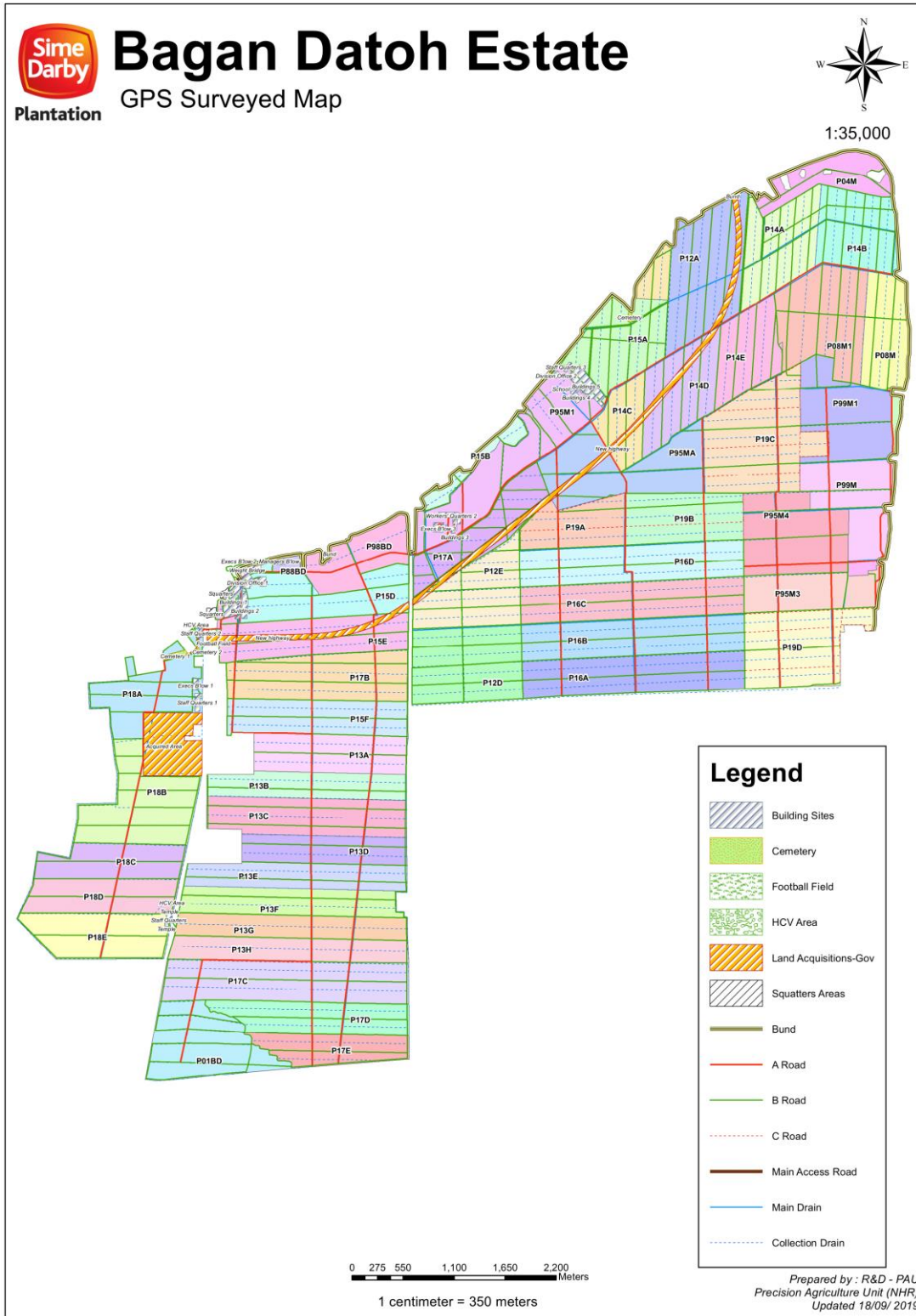




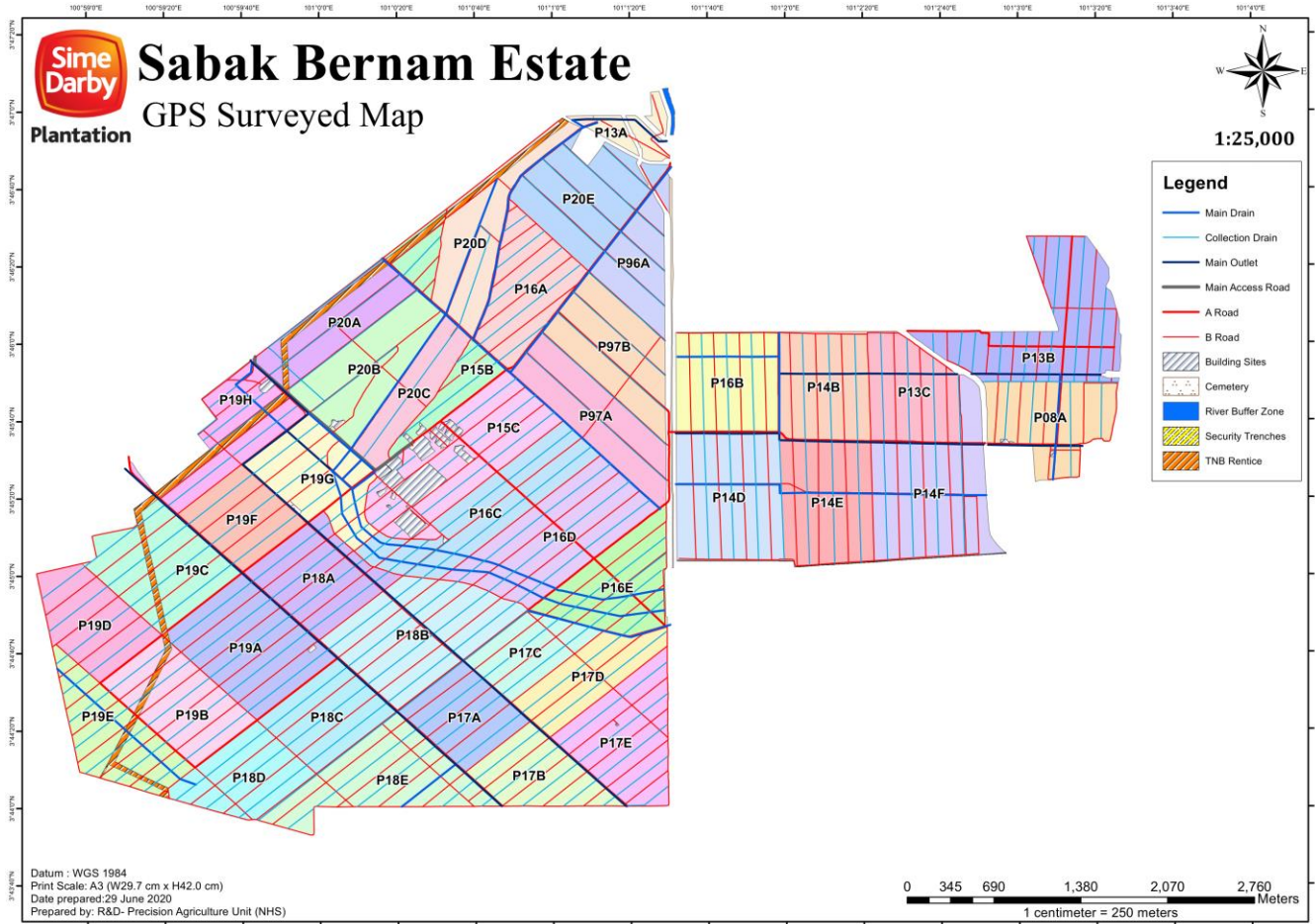
Flemington Estate: Div. 2



Bagan Datoh Estate:

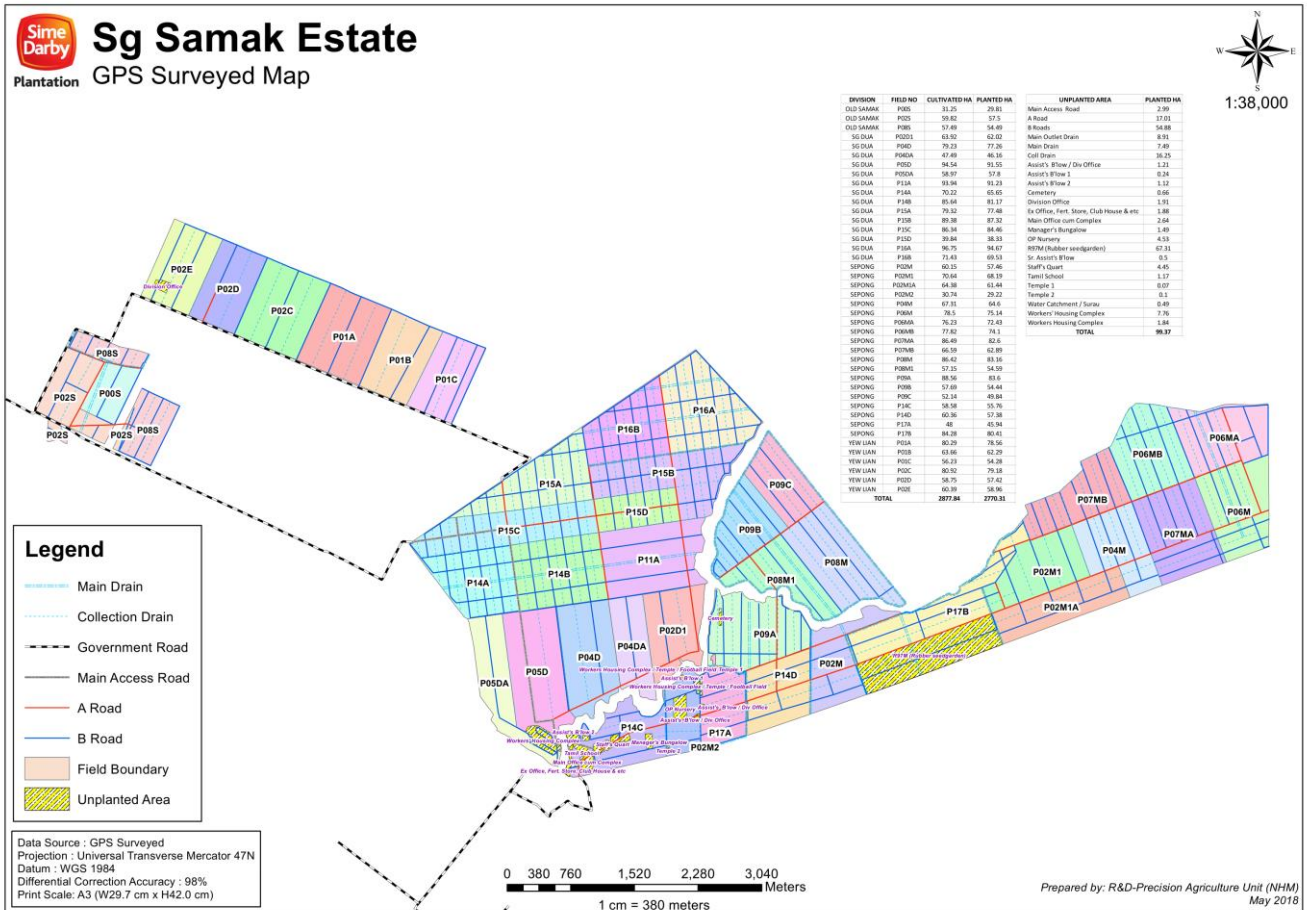


Sabak Bernam Estate:





Sungai Samak Estate:



**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									
<b>Total</b>									

Note: \* are smallholders sampled in this audit.

**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