

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company Name / Parent Company: SD Guthrie Berhad
Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 18) – Diamond Jubilee Palm Oil Mill Location of Certification Unit: KM 8, Jasin – Simpang Bekoh Road, Jasin, 77100, Melaka, Malaysia
Date of Final Report: 01/10/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SD Guthrie Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 11, Main Block, Plantation Tower No 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 18) – Diamond Jubilee Palm Oil Mill		
Location / Address	KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia		
Website	www.sdguthrie.com		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD)	E-mail	shylaja.vasudevan@sdguthrie.com
Telephone	+(603) 78484000 (HQ)	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 591224	Certificate Start Date	05/10/2021
Date of First Certification	05/10/2011	Certificate Expiry Date	04/10/2026
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory, and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	25 MT/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 688335	MSPO 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	09/01/2028
MSPO 682043	MSPO 2530-4:2013 General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	09/01/2028
MSPO 714120	MSPO Supply Chain Certification Standard 2018	BSI Services Malaysia Sdn Bhd	11/07/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Diamond Jubilee POM	KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia	2° 19' 29" N	102° 28' 59" E
Diamond Jubilee Estate	KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia	2° 19' 50" N	102° 29' 18" E
Bukit Asahan Estate	Jalan Asahan 77100 Melaka, Malaysia	2° 23' 38" N	102° 32' 45" E
Welch Estate	Jalan Segamat - Jementah 85200 Segamat, Johor, Malaysia	2° 27' 22" N	102° 39' 12" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Diamond Jubilee Estate	2,545.52*	5.58	279.54**	2,830.64	89.93
Bukit Asahan Estate	2,965.53	1.36	105.29	3,072.18	96.53
Welch Estate	576.2	0.95	870.67	1,447.82	39.80
Total	6,087.25	7.89	1,255.5	7,350.64	
Note: 1) *77.72 ha of total planted area of Diamond Jubilee Estate has been acquired for state gov development project. 2) **A resurvey of the hectareage has been conducted, leading to adjustments that affected the infrastructure and other areas. The most recent land survey, carried out in January 2024 by the Precision Agricultural Unit (PAU) from Internal R&D, determined that the actual estate area is 2830.64 ha (as per the Estate Hectares Statement, HRVRM029 dated 1/7/2024). Consequently, the total infrastructure area at the Diamond Jubilee Estate has been updated from 187.92 ha in 2023 to 279.54 ha in 2024 (as reflected in the table above). No new planting has been verified.					

- 3) Since the hectareage adjustment involved the addition of a certified area, it was necessary to ensure accuracy using updated tools and technology. Additionally, according to the guidance outlined in "Pekeliling Ketua Pengarah Ukur dan Pemetaan Bilangan 5 Tahun 2009," Chapter 5 clearly states that the difference within the threshold is acceptable.

6. Plantings & Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Diamond Jubilee Estate	56.70	1,093.28	1,386.48	9.06	2,488.82	56.70
Bukit Asahan Estate	534.61	614.01	1816.91	0.00	2,430.92	534.61
Welch Estate	0.00	0.00	543.16	33.04	576.20	0.00
Total (ha)	591.31	1,707.29	3,746.55	42.10	5,495.94	591.31

Note: Only Mature area is considered as production area

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

Estate / Smallholders	Tonnage (MT) / year					
	Estimated Last Year (Oct 2023 – Sept 2024)		Actual (July 2023 – June 2024)		Forecast (Oct 2024 – Sept 2025)	
			Previous license period (July 2023 – Sept 2023)	Current license period (Oct 2023 – June 2024)		
Diamond Jubilee Estate	35,915.00		14,026.91	35,392.45	42,623.45	
Bukit Asahan Estate	40,000.00		7,462.22	24,064.40	44,450.43	
Welch Estate	32,000.00		2,241.77	6,400.48	8,092.13	
	IP	122,947.08	IP	89,588.23	IP	95,166.01
	MB	1.00	MB	0.00	MB	1.00

Notes:

Despite adding the MB Module in the Scope of Certification, Diamond Jubilee still only processes FFBs from its owned supply bases (Diamond Jubilee Estate, Bukit Asahan Estate, and Welch Estate) and other SD Guthrie 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.

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.

Low actual production due to low crop pattern, affected from harvester to area ratio, rain fall pattern and consideration of prime age of the OP.

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

	Tonnage (MT) / year
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Estate / Smallholders	Estimated Last Year (Oct 2023 – Sept 2024)	Actual (July 2023 – June 2024)		Forecast (Oct 2024 – Sept 2025)
		Previous license period (July 2023 – Sept 2023)	Current license period (Oct 2023 – June 2024)	
Pertang Estate		0.00	145.190	
Kok Foh Estate		0.00	263.820	
Total		409.01		-

Note: Certified FFB was received from sister estate under SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) which RSPO Certified. Refer TBP.

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated Last Year (Oct 2023 – Sept 2024)	Actual (July 2023 – June 2024)		Forecast (Oct 2024 – Sept 2025)
		Previous license period (July 2023 – Sept 2023)	Current license period (Oct 2023 – June 2024)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	July 2023	7,120.672	N/A	7,120.672
2	Aug 2023	8,191.051	N/A	8,191.051
3	Sept 2023	8,419.177	N/A	8,419.177
4	Oct 2023	8,086.948	N/A	8,086.948
5	Nov 2023	8,350.159	N/A	8,350.159
6	Dec 2023	7,377.867	N/A	7,377.867
7	Jan 2024	7,534.484	N/A	7,534.484
8	Feb 2024	5,281.313	N/A	5,281.313
9	Mar 2024	6,178.959	N/A	6,178.959
10	Apr 2024	7,432.027	N/A	7,432.027
11	May 2024	8,900.853	N/A	8,900.853
12	June 2024	7,123.72	N/A	7,123.72
TOTAL		89,997.24	N/A	89,997.24

10. Summary of Certified Tonnage (MT) (not applicable for ISS)							
Estimated Last Year (Oct 2023 – Sept 2024)		Actual (July 2023 – June 2024)				Forecast (Oct 2024 – Sept 2025)	
		Previous License Period (July 2023 – Sept 2023)		Current License Period (Oct 2023 – June 2024)			
FFB		FFB				FFB	
IP	122,947.08	IP	23,730.90	IP	66,266.34	IP	95,166.01
		MB	0.00	MB	0.00		
MB	1.00	TOTAL	IP	89,997.24	MB	1.00	
			MB	0.00			
CPO (OER: 21.50 %)		CPO (OER: 20.96%)				CPO (OER: 21.66 %)	
IP	26,433.62	IP	4,574.627	IP	13,131.19	IP	22,050.30
		MB	0.00	MB	0.00		
MB	1.00	TOTAL	IP	17,705.81	MB	1.00	
			MB	0.00			
PK (KER: 5.20 %)		PK (KER: 4.91%)				PK (KER: 5.40 %)	
IP	6,762.09	IP	1,179.084	IP	3,241.819	IP	5,497.27
		MB	0.00	MB	0.00		
MB	1.00	TOTAL	IP	4,420.90	MB	1.00	
			MB	0.00			
Note(s): 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. Low actual production due to low crop pattern, affected from harvester to area ratio, rain fall pattern and consideration of prime age of the OP.							

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	July 2023	1,341.518	346.358
2	Aug 2023	1,562.874	409.550
3	Sept 2023	1,670.235	423.176
4	Oct 2023	1,618.416	400.884
5	Nov 2023	1,616.514	419.987
6	Dec 2023	1,451.932	364.259
7	Jan 2024	1,542.406	374.137

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8	Feb 2024	1,102.544	264.897
9	Mar 2024	1,211.489	306.43
10	Apr 2024	1,479.628	372.306
11	May 2024	1,719.866	433.354
12	June 2024	1,388.391	305.565
TOTAL		17,705.81	4,420.90

11. Summary of Actual Volume sold**Current License period (Oct 2023 – June 2024)**

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	11,214.66	0	0	2,017.26	13,231.92
PK (MT)	2,469.6	0	0	446.97	2,916.57
Credits	0	0	0	0	0

Previous License period (July 2023 – Sept 2023)

CPO (MT)	2,132.34	0	0	603.56	2,735.9
PK (MT)	645.29	0	0	529.28	795.29
Credits	1,500	0	0	0	1,500

Note:

1. Conventional is RSPO certified material but sold as non-RSPO.
2. As the period, there is no Certified CPO and PK sold as MB

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)

No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Buyer A	TR-XXXXXXXX-XXXX	13,347.00	3,114.89
TOTAL			13,347.00	3,114.89

Note: Data is consolidated, and each transaction were verified against PalmTrace**11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)**

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

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Buyer B	2,620.82	976.25
TOTAL		2,620.82	976.25

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	Buyer C	CBXXXXXXXX	1,500.00
TOTAL			1,500.00

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (N/A)			Actual (N/A)			Forecast (N/A)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

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

Note: 1 mt = 1 credit

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Oct 22 – Jun 23)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Jul 22 – Sept 22)							

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Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

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

Section 2: Assessment Process

Certification Body:

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

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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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 **02-05/07/2024**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **4/9/20204 and 18/9/2024**. The audit programme is included as Section 2.3.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Diamond Jubilee POM	✓	✓	✓	✓	✓
Diamond Jubilee Estate	✓	✓	✓	✓	✓
Bukit Asahan Estate	✓	✓	✓	✓	✓
Welch Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: July 1, 2025 - July 4, 2025

Total Number of Mandays: 12 Mandays

2.2 BSI Assessment Team

Annual Surveillance Assessment (ASA 2_3)

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

		<p>HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021 & ISH Training by RSPO in August 2023</p> <p>Language proficiency: Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Valence Shem (VSH)	Team Member	<p>Education: BTech (Hons) Bachelor's Degree in Industrial Technology, University of Science Malaysia</p> <p>Work Experience: 9 years working experience in oil palm plantation industry Management system auditing since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS, MSPO and SMETA</p> <p>Training attended:</p> <ul style="list-style-type: none"> • ISO 14001 Lead Auditor Course • ISO 9001 Lead Auditor Course • Endorsed RSPO P&C Lead Auditor Course • Endorsed RSPO SCCS Lead Assessor Course • MSPO Awareness Training • ISO 45000 Lead Auditor Course • SMETA Auditor training • HCV-HCS training • RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course <p>Language proficiency: English and Bahasa Malaysia</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Fahmi Othman (FHO)	Team Member	<p>Education: Bachelor's Degree in Industrial Biology from Universiti Teknologi Malaysia, graduated in 2010.</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an Assistant Manager with FGV Plantation (M) Sdn Bhd managing the day-to-day plantation operations before joining FGV Holdings Berhad as</p>

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		<p>Sustainability Officer for another significant numbers of years. In his career at FGV, Fahmi had accumulated more than 7 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans</p> <p>Training attended:</p> <p>He has completed CQI – IRCA approved ISO 9001, and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course as well as SA 8000.& ISH Training by RSPO December 2023</p> <p>Language proficiency:</p> <p>Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
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Accompanying Persons:

Name	Role
-	-

2.3 Assessment Plan

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

Date	Time	Subjects	NHA	VSH	FBO
Monday 01/07/2024	-	Audit Team Travel to Hotel	√	√	√
Tuesday 02/07/2024 Bukit Asahan Estate	0830 - 0900	<p>Opening Meeting:</p> <p>- Opening Presentation by Audit Team Leader.</p> <p>- Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).</p>	√	√	√
	0900 - 1200	<p>Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc.</p> <p>Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)</p>	√	√	√

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Date	Time	Subjects	NHA	VSH	FBO
	1230 - 1330	Lunch Break	√	√	√
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Wednesday 03/07/2024 Diamond Jubilee POM	0830 - 1230	<p>Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc.</p> <p>Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)</p> <p>Supply chain requirements for POM</p> <ul style="list-style-type: none"> • SCCS Module • Internal Audit • Outsourcing activities • Purchasing and Goods In • Sales and Goods Out - Outsourcing Activities • Record keeping - Extraction Rate • Processing • Registration of transaction – Claims • Rules on market communication and claim 	√	√	√
	1230- 1330	Lunch Break	√	√	√
	1330 - 1630	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√

Date	Time	Subjects	NHA	VSH	FBO
Thursday 04/07/2024 Welch Estate	0830 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc. Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)	√	√	√
	1230-1330	Lunch Break	√	√	√
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Friday 05/07/2024 Diamond Jubilee Estate	0830 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc. • Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)	√	√	√
	1300 - 1400	Lunch Break	√	√	√
	1400 - 1600	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1600 - 1700	Audit team discussion & Closing Meeting	√	√	√

Critical NC Close Out On-site Assessment Plan (1st Visit)

Date	Time	Subjects	NHA
Tuesday 03/09/2024	-	Auditor Travel to Hotel	√

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Date	Time	Subjects	NHA
Wednesday 04/09/2024	-	Auditor Travel to Site	√
DJ POM DJ Estate Welch Estate Bukit Asahan Estate	0900 - 1200	Soft Opening Meeting: <ul style="list-style-type: none"> Verification on previous Major NC: <ul style="list-style-type: none"> 2517622-202407-M1 2517622-202407-M2 Site observation, workers interview (individual and group session) if necessary Document review – implemented evidence 	√
	1200 - 1300	Closing Meeting	√

Critical NC Close Out On-site Assessment Plan (2nd Visit)

Date	Time	Subjects	NHA
Tuesday 17/09/2024	-	Auditor Travel to Hotel	√
Wednesday 18/09/2024	-	Auditor Travel to Site	√
DJ Estate	0900 - 1100	Soft Opening Meeting: <ul style="list-style-type: none"> Verification on previous Major NC: <ul style="list-style-type: none"> 2517622-202407-M1 (Revisit at DJ Estate) Site observation, workers interview (individual and group session) if necessary Document review – implemented evidence 	√
	1100 - 1130	Closing Meeting	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills	SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) TBP has included all its operating units	Complied

that is under the control and/or minor shareholding of the holding company?	<p>in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>On 16/01/2020, SD Guthrie Berhad (Formerly known as SD Guthrie Berhad (Formerly known as 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):</p> <p>https://www.sdguthrie.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</p>	
<p>Have all the estates and mills certified within five (5) years after obtaining RSPO membership?</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021</p>	<p>Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SD Guthrie Berhad (Formerly known as 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 SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) have no control in the management. Refer TBP approval dated 13/07/2023.</p>	Complied
<p>Have there been any new acquisitions?</p> <p>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.</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p>	<p>There are no new acquisitions. There is new propose on 2024. Land legalization still in progress dated approval by RSPO on 13 Julai 2023 for these Estate.</p> <ol style="list-style-type: none"> 1. Ladang Panjang Estate-1,796.19 ha 2. Rantau Panjang Estate, Napal Estate / Karang Ringin Estate- 1,843.73 ha. 3. Mangun Jaya Estate- 1,398.55 ha 4. Sungai Jernih Estate- 851.57 ha 5. Pelanjau Estate (PT BAL) & Beturus Estate (PT BAL)- 4,071.76ha 6. Karya Palma Estate (PT SNP)-476.70 Ha 7. West and East Estate- 1,452.93 ha 	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there is deviation has been identified at those Indonesia management units but it has been justified and approved by RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.	Complied
Have there been any changes to the time-bound plan since the last audit	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,	Complied

<p>(both new acquisition and existing)? If yes, justification is required.</p> <p>Is this consistent with the ACOP reporting?</p>	<p>Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties were sold and currently SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019.</p> <p>Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: SD Guthrie Berhad (Formerly known as 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:</p> <p>www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16/01/2020, SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p>https://www.sdguthrie.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</p> <p>ACOP 2020 has been cross-referenced as below:</p> <p>www.rspo.org/members/29</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>Although there are lapses has been identified at those Indonesia management units, but it has been justified and approved by the RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>
Un-Certified Units or Holdings		
<p>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.</p>	<p>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.</p>	<p>Complied</p>

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<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) that have completed NPP notification.</p> <ol style="list-style-type: none"> 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/ 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/ 3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/ 4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/ 5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/ 6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/ 7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/ 8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/ 9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website 	<p>Complied</p>
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	<p>https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</p> <p>11. NBPOL (Ramu Agri Industries Ltd) 06/03/2012 - no comments captured in RSPO website: https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</p> <p>14. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</p> <p>Management units for 12 – 14 above were disposed</p>	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia 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 16-25 Oct 2023, and 13-17 Nov 2023, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C.</p>	Complied

	It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about land conflict has been lodge by stakeholders as at the day of audit.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>SD Guthrie Berhad (at the point of this audit known as Sime Darby Plantation Berhad) have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p> <p>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, no labour dispute issues reported.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about labour dispute has been lodge by stakeholders as at the day of audit.</p> <p>SD Guthrie Berhad (at the point of this audit known as Sime Darby Plantation Berhad) have published Grievance mechanism that is applied to all management units. Disputes related to labour, stakeholders and communities are to be dealt using this mechanism</p>	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) maintains corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p> <p>Under RSPO DSF, the latest registered complaint for SD was in 2017. No latest complaint case reported in DSF.</p>	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue is mainly waiting for Land Titles. The last audit was conducted in 16-25 Oct 2023, and 13-17 Nov 2023. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. HCV Assessment has been conducted for all SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) operations since 2010, there has been no clearance of HCV areas after the HCV Assessment has been conducted and verified during the annual RSPO External and Internal Audit reports. The liability happened as there were no HCV Assessment done at the time of planting for the cases which were entered into the RACP process.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5,	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

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?		
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

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Approved Time Bound Plan

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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3.3 Details of Nonconformities

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

During this Assessment there were *One* (2) Critical; *One* (1) Minor nonconformities and Two (2) Opportunity For Improvement raised. The SD Guthrie Berhad SOU 18 Diamond Jubilee Palm Oil Mill & Supply Bases Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2517622-202407-M1	Issued Date	05/07/2024
Due Date	04/10/2024	Closure Date	04/09/2024
Indicator & Category (Critical / Minor)	3.6.1 Critical		
Statement of Nonconformity:	H&S procedures and mitigation plans related HIRARC and CHRA was not fully implemented.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p>Diamond Jubilee POM</p> <p>During an observation and site visit at the ramp, it was discovered that one of the contractor's drivers from Diamond Jubilee Estate was wearing casual shoes instead of safety boots. This does not comply with the HIRARC- Ramp Activity updated on 29/02/2024, which requires all lorry drivers to wear safety shoes within the mill compound.</p> <p>Diamond Jubilee Estate</p> <p>The following containers were used to contain chemicals without any proper re-labelling in accordance with CHRA (OSHA), USECHH Regulation, 2000, Reg. 21: Diamond Jubilee Estate (Bukit Kajang Division)</p> <p>1) 2 bottle of Petrol and 2 bottle of Lubricant were stored in the container without any labelled.</p> <p>2) Empty 20 liter chemical mixing container was left unattended at Tractor parked in the workshop</p>		
Corrections:	<p>DJ Mill</p> <ol style="list-style-type: none"> 1. Issued Stop Work Order to ITHNAIN BIN RINI , lorry from Diamond Jubilee Estate from 2/7/2024 until 3/7/2024 until driver have comply with mill SOP. 2. Briefing to AP on required PPE at mill. <p>DJ Estate</p> <ol style="list-style-type: none"> 1. To collect the the mentioned containers/ drinking water bottle and disposed as SW409 2. To label the container with proper labelling according to legal requirement. 3. Briefing to workshop fitter on relabelling procedure & chemical safety management 		

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	4. To store the Empty 20 liter chemical mixing container in the designated store.
Root Cause Analysis:	<p>DJ Mill</p> <ol style="list-style-type: none"> 1. Mill did not communicate the HIRARC requirement to lorry driver as the contractor is under DJ Estate. 2. AP was not able to distinguish between safety boots and sports shoes as they look the same and insufficient checking done. <p>DJ Estate</p> <ol style="list-style-type: none"> 1. There is no monitoring of chemical handling or labelling at Bukit Kajang Division. Foreman' visit is only once or twice a week to the division. 2. OU Management did not provide secondary containers with labelling to workshop fitters resulting in the fitter used his own container.
Corrective Actions:	<p>DJ Mill</p> <ol style="list-style-type: none"> 1. Briefing on PPE requirement should also be extended to lorry drivers/ contractors at least once a year 2. To educate AP using a memo on the appropriate PPE while entering mill area 3. Moving forward, AP will check if anyone entering mill area is equipped with required PPE according to the memo and will not allow those without PPE until they get clearance from Mill Management <p>DJ Estate</p> <ol style="list-style-type: none"> 1. Scheduled briefing to workers on relabelling procedure 2. PIC of workshop as well Assistant in Charge of Bukit Kajang Division to do monitoring at surrounding workshop area for any unattended chemical container 3. OU Management to provide proper container to stored petrol and lubricant with label. 4. OU Management to display Pictorial Work Instruction (PWI) at the workshop area explaining the requirements.
Assessment Conclusion:	<p>Major NC Close Out</p> <p>DJ Mill</p> <p>Training to contractor has been conducted on 16-19/08/2024 on PPE matters. Sighted training material, attendance, and photos. Memo to Auxiliary Police on PPE Enforcement has been established dated 06/07/2024. Monitoring has been made through Esime+. Latest inspection has been done 25 & 28/08/2024.</p> <p>DJ Estate</p> <ol style="list-style-type: none"> 1. Training on Re Labelling Container has been conducted on 10/09/2024 at Muster Briefing for all workers and 10/09/2024 for Person In Charge of Workshop by Regional Safety, Health & Environment Department. Sighted evidence of Training material, attendance and photos. 2. Site verification was conducted and found no issue and interview conducted with person in charge found have good awareness on it. 3. Interview with estate management confirmed that correction and corrective action has been implemented.

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	Based on the above evidence, the major non-Conformity is closed effectively on 18/09/2024. Continuous implementation will be further verified in the next assessment.
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Non-conformity			
NCR Ref #	2517622-202407-M2	Issued Date	05/07/2024
Due Date	04/10/2024	Closure Date	04/09/2024
Indicator & Category (Critical / Minor)	7.10.3 Critical		
Statement of Nonconformity:	Pollution Prevention Management Plan was not effectively implemented.		
Requirement Reference:	Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.		
Objective Evidence:	<p>Bukit Asahan Estate</p> <p>During site visit at Tractors Parking Bay, it was found three spot of soil contamination resulting from spillage from old tractors. It was not in line with Management Plan stated that Tractor Parking Bay – To maintain oil trap as to prevent oil spillage and to provide proper spill kit. Other that that, it was found 6 units of oil filters left unattended in the old trailer parked there. Based on interview the filters own by contractor working in the estate. It was not in line with Management Plan stated that SW – To ensure all schedule waste is stored and disposed as per legal requirement.</p> <p>Diamond Jubilee POM</p> <p>There is no oil tray provided at Heavy Mechanical Park Area (1 unit JCB and 2 unit tractors) resulting of spillage oil direct to the soil. It was not in line with Pollution and prevention plan stated To maintain Oil Trap and to provide proper spill kit.</p> <p>Welch Estate</p> <p>During site visit at Water Catchment Area, Water Pump House, it was observed some of empty lubricant container and 20L chemical container was left unattended. Based on interview the SW stored there was not identified more than 180 days. It was not in line with Pollution Prevention Management Plan under section Management of schedule waste stated To ensure all schedule waste is stored and disposed as per legal requirement.</p> <p>Diamond Jubilee Estate</p> <p>During site visit at Workshop Area it was observed old tractors parked there without oil tray resulting of soil contamination. It was in line with pollution Prevention management Plan under section Management of land and water pollution stated Spill tray for farm vehicle.</p>		
Corrections:	<p>Bukit Asahan Estate</p> <ol style="list-style-type: none"> To dispose the contaminated soil as scheduled waste, code SW408. To dispose all 6 units of oil filters under SW410. Warning letter to the mentioned contractor that does not follow the sop and contribute to environment contamination. 		

	<p>4. To erect signages of “Dilarang Masuk Tanpa Kebenaran” and put up caution tape to prevent unauthorized entry.</p> <p>DJ POM</p> <ol style="list-style-type: none"> 1. To provide sufficient spillage tray for 1 unit backhoe and 2-unit tractors at parking spot in mill compound. 2. To brief all workers on management of spillages of heavy vehicles <p>Welch Estate</p> <p>To clean up and clear all the lubricant and chemical container from the Water Pump house and transfer it to Schedule Wates store for disposal.</p> <p>DJ Estate</p> <ol style="list-style-type: none"> 1. Collected all the contaminated soil and scheduled for disposal as contaminated soil under code SW408. 2. Put tray for preventing the lubricant oil from leak to the ground.
Root Cause Analysis:	<p>Bukit Asahan Estate</p> <p>The review of the environmental management plan was not comprehensively done as it did not identify the contamination from nonoperational area such as old tractors parking bay. Hence, the monitoring mechanism to ensure no soil contamination & scheduled wastes disposal were not in place.</p> <p>DJ POM</p> <ol style="list-style-type: none"> 1. The tractor driver is a new hire and he is yet to be briefed on the environmental protection measures stated in pollution prevention plan. The induction session only covered policies and safety aspects of the tasks. 2. The requirement to the requirement that tray is compulsory for any parked machineries is not communicated and understood. 3. Ineffective communication t by the Management to ensure that the SOP is complied to. <p>Welch Estate</p> <p>There is no specific monitoring tools for the water pump House as it was not being function or used for many years</p> <p>DJ Estate</p> <p>The old tractors parking area is not identified in the pollution prevention plan as the scope of pollution prevention plan did not cover nonoperational area. Hence, the preventive measures, trays and monitoring were not in place for old tractor parking area.</p>
Corrective Actions:	<p>Bukit Asahan Estate</p> <ol style="list-style-type: none"> 1. OU Management to identify other non operational areas where there may be scheduled wastes generated/ sources of pollution and identify the relevant monitoring mechanisms. 2. To include the discussion on non operational areas monitoring mechanism in the quarterly environmental review meeting. 3. To do scheduled monitoring in particularly on placement of tray for “write off” tractor to avoid any oil leakage goes unnoticed.

	<p>4. Regular briefing and training to the PIC about the awareness of environment contamination, schedule waste and sop workshop.</p> <p>DJ POM</p> <p>Mill Management to ensure that future induction to also include pollution prevention plan. Mill management will issue out a memo together with Pictorial Work Instruction (PWI) to explain the requirements related to oil spillages to all relevant personnel.</p> <p>Welch Estate</p> <p>To enhance estate monitoring tools which is by include Water Pump House in the WPI checklist. All result from the WPI assessment to be discuss in the management meeting for estate management next of action.</p> <p>DJ Estate</p> <p>The pollution prevention plan to cover all non-operational areas. Briefing and training to the PIC i.e. Assistant in charge & foreman about the awareness of environment contamination, schedule waste and workshop SOP.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <p>Welch Estate</p> <p>Inspection of water pump house has been include in WPI. Refer Pemeriksaan tempat kerja Form Section 35.1. Briefing has been given to workers regarding SW management and HCV area dated 05/07/2024. Site visit at water pump house found the condition was in order.</p> <p>Bukit Asahan Estate</p> <p>Waste management plan has been updated at 02/08/2024. Monitoring on Old Parking Tractor has been included and has been monitored on Quarterly 3. Discussion in the meeting has been made. Refer Sustainability Management Review Meeting dated 02/08/2024 section 5.1.7. Inspection has been in the WPI dated 29/07/2024 refer section 14. Training has been made at 15/08/2024. Sighted training material, attendance and photos.</p> <p>DJ POM</p> <p>Refer amendment of 2024 New Worker Induction that has included matters on pollution prevention. Memo on Spillage Issue for Tractor and Backhoe has been established dated 19/08/2024. WPI has been updated on 12/08/2024, refer section after completing work.</p> <p>DJ Estate</p> <p>Waste Management and Pollution Prevention Planplan has been updated as per latest document dated 10/09/2024. Training has been conducted on 19/07/2024. Sighted evidence of training material, attendance and photos.</p> <p>Interview with estate management confirmed that correction and corrective action has been implemented.</p> <p>Based on the above evidence, the major non-Conformity is closed effectively on 04/09/2024. Continuous implementation will be further verified in the next assessment.</p>

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Non-conformity			
NCR Ref #	2517622-202407-N1	Issued Date	05/07/2024
Due Date	Next Assessment	Closure Date	TBC
Indicator & Category (Critical / Minor)	2.1.2 Minor		
Statement of Nonconformity:	The monitoring to ensure legal compliance was not effectively implemented.		
Requirement Reference:	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.		
Objective Evidence:	The canteen at Welch Estate has 3 staff involved in food handling. Typhoid injection has been taken for all staffs. However, it was found that only 1 of them has attended the MOH approved food handling course while the other 2 staff have not. This is not in-line with the Food Hygiene Regulations 2009.		
Corrections:	<ol style="list-style-type: none"> 1. Immediately issue the stop working order letter to the workers that did not attend to food handling course. Workers can only resume work once proven attending the food handling course. 2. Briefing to the owner on the Food Hygiene Regulation 2009. " Term of Food handling" 3. To immediately liaise with Group Sustainability to add Food Hygiene Regulations 2009 in LORR listing. 		
Root Cause Analysis:	Food Hygiene Regulations 2009 is not listed in the Estate Legal & Other Required Regulation (LORR). Hence, this is not captured in any regular review where Estate review the details of regulation including the definition of food handlers. The initial understanding was that food handling is referring to workers that work at the kitchen area and not applicable to workers taking ordering or that serve food to the customer. Therefore, the 2 staff were not sent for food handling course.		
Corrective Actions:	<ol style="list-style-type: none"> 1. OU Management will perform 6 monthly checking to canteen operator to ensure compliance. 2. Group Sustainability to share the updated LORR to Upstream Malaysia which includes Food Hygiene Regulations 2009. 		
Assessment Conclusion:	CAP has been accepted. The effectiveness of the implementation will be verified during next visit.		

Opportunity for Improvements	
OFI #	Description
OFI 1	2517622-202407-I1 3.4.1 Welch Estate SEIA assessment has been conducted at March 2023 for a new development where a 248.98 Ha of rubber plantation (field no. R01A, R01B, R01B1, R13A and R14A) to be converted to oil palm plantation. However the identification of all related affected smallholders could be further improved.

Opportunity for Improvements	
OFI #	Description
OFI 2	<p>2517622-202407-I2</p> <p>7.11.3</p> <p>Welch Estate & Diamond Jubilee Estate</p> <p>Sighted evidence of communication on fire prevention for adjacent stakeholders has been on 13/06/2024 and 21/06/2024 at Welch Estate and Diamond Jubilee Estate respectively however, as per sample verification the engagement and communication details record could be further improved.</p>

Positive Findings	
PF #	Description
PF 1	Good Commitment from the Management Team towards RSPO Certification.
PF 2	Good Implementation of Agronomic and Environmental Practices.
PF 3	Good understanding by staffs and workers on GAP, H&S and Environment Protections

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2364282-202306-M1	Issued Date	06/07/2023
Due Date	05/10/2023	Closure Date	30/08/2023
Indicator & Category (Critical / Minor)	1.1.3 (Critical)		
Statement of Nonconformity:	Requests for information and responses related to NUPW issues were not effectively maintained.		
Requirement Reference:	Records of requests for information and responses are maintained.		
Objective Evidence:	<p><u>Diamond Jubilee Estate</u></p> <p>Chronology of event on NUPW Melaka state request;</p> <p>16/03/2023 – 1st joint consultative meeting between the management of Diamond Jubilee Estate and site NUPW representative together with NUPW Melaka state secretary.</p> <p>19/06/2023 – Letter issued by NUPW Melaka state branch, ref: NUPW/MSB/JCC/2023 for a 2nd joint consultative meeting as written in the letter; “Pihak kami sehingga kini masih tidak mendapat apa-apa keputusan mengenai beberapa perkara berikut”</p> <p>3 pending issues highlighted:</p> <ul style="list-style-type: none"> - Salary payment to supervise Gang Base Team for mandore MXXXXXXX RXXXXXXX. - Difference of salary for MTG drivers from 17% to 20% 		

	<ul style="list-style-type: none"> - Claim payment for dependent (travel claim) for Mr TXXXXXXX NXXXXXXXXX Bukit Kajang Division) <p>A session with NUPW site representative and NUPW Melaka state secretary was held on 04/07/2023. It was acknowledged that no official response made for the above pending issues by the management to the complainant. The management in response confirmed that they have engaged with them to respond on the progress of the issues. Nevertheless, there were no record evidence available of responses maintained by the management in regard to this matter.</p> <p>Reference: MAPA/NUPW Collection Agreement 2019, Article 5 – Grievance Redressal Procedure.</p>
Corrections:	<ol style="list-style-type: none"> 1. A letter to response on request made by worker representative sent on 7th July to Melaka NUPW secretary to inform on the reimbursement of tractor driver salary and medical expenses claim by the worker. 2. A meeting with NUPW was set on 11th July to discuss on the additional salary / allowance of team-based mandore. 3. It was agreed during the meeting that HR Governance & Industrial Relations need to highlight to mechanisation department and will inform on the status by end of July. 4. Union representative also was briefed to highlight all issues pertaining to worker welfare during Social Dialogue.
Root Cause Analysis:	Lapses in communication between management and the previous Person in Charge (PIC) to monitor the case development since the meeting on 16/3/2023.
Corrective Actions:	<ol style="list-style-type: none"> 1. The management has appointed two (2) key person i.e. one from executive and one from office representative. <ul style="list-style-type: none"> - The key person will be responsible to compile requests or complaints received from stakeholders and to be communicated to the management on a regular basis.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. The estate management have issued a letter to response on request made by worker representative dated 07/07/2023 to Melaka NUPW secretary to inform on the 3 issues mentioned above. 2. A meeting was held by the estate management with the presence of NUPW Secretary (Melaka), Main Division Union Chairman and Regional HR Asst Manager dated 11/07/2023. The meeting minutes was available for verification, documented in "<i>Mesyuarat Perundingan Bersama NUPW</i>". The details as below. <ul style="list-style-type: none"> – Salary payment to supervise Gang Base Team for mandore: It was agreed that the management will be given till end of July 2023 to finalise the payment. The management have updated the NUPW Secretary on the status of the salary payment via email dated 30/08/2023. The management have agreed on a mode of payment and will be backdated and paid to the mandore accordingly. A meeting was conducted on 28/08/2023 with the state NUPW representatives as well to update them on the status of the issue. – Difference of salary for MTG drivers from 17% to 20%: Estate Management to obtain approval from RGM to reimburse the underpaid wages to all MTG Drivers. It was verified that all underpaid wages have been reimbursed to the MTG drivers accordingly.

	<ul style="list-style-type: none"> – Claim payment for dependent: Payment to be reimbursed to the worker accordingly. It was verified that the payment has been reimbursed accordingly. Sighted the "Personal Expenses Reimbursement Claim; Doc Number: DJE-CV 001/JULY.2023) reimbursed on 07/07/2023 and acknowledged by the worker. <p>3. Union representatives were briefed to highlight all issues pertaining to worker welfare during Social Dialogue. Sighted the memo titled "<i>Memorandum Tugas-Tugas Wakil Union Dalam Sesi Sosial Dialog</i>" dated 08/07/2023 by the estate manager to union representatives.</p> <p>4. The estate management have appointed the Sr. Assistant Manager (Appointment Letter Dated 01/05/2023) and the Account Admin Officer (Appointment Letter dated 01/08/2023) to be responsible to compile requests or complaints received from stakeholders and to be communicated to the management on a regular basis. The appointment letters undersigned by the estate manager was available for verification.</p> <p>The implementation of the correction and corrective action plan to address the raised critical non-conformity was able to close the issue. Therefore, the critical non-conformity was successfully closed on 30/08/2023.</p>
Verification Statement	<p>There were no similar concerns raised by any workers. The gang base mandore has been explained by the management that the payment is all the while paid. Through interview, the mandore confirmed that he had been explained about the payment and clearly understand the issue.</p> <p>Verification of pay slips at the sampled operating units confirmed that the 20% wage payment for the MTG drivers were delivered accordingly. This was also confirmed by the drivers through interview.</p> <p>Interview with the NUPW Malacca during confirmed that there were no pending issues nor new issues raised ever since the last assessment.</p> <p>The implementation of corrective actions found to be effective and no recurrence of non-conformance. Thus, the NCR remains closed.</p>

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2364282-202306-M2	Issued Date	06/07/2023
Due Date	05/10/2023	Closure Date	30/08/2023
Indicator & Category (Critical / Minor)	6.2.2 (Critical)		
Statement of Nonconformity:	Compensation for all worked performed was not accurately paid based on information in payroll documents.		
Requirement Reference:	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.		
Objective Evidence:	Head of Group HR, Governance & NE email dated 12/01/2022 is referred to on the new directive:		

	<ul style="list-style-type: none"> To stop retaining 3% (Division of Earning) for SD3 system machine operator (MTG) wages (maintenance purpose) SD3 system machine operator (MO) (MTG) to receive full wages (Division of Earning, DOE @ 20%), previously 17% for SD3 MO driver. <p><u>Diamond Jubilee Estate</u></p> <p>Based on pay slip for MO ID 144511, for period of January 2022 to June 2023;</p> <ul style="list-style-type: none"> Jan 2022 - Feb 2022: 20% division of earning (2 months) Mar 2022 - Jan 2023: 17% division of earning (11 months) Feb 2023 - June 2023: 20% division of earning (5 months) <p>The worker has not received accurate division of earning (DOE) @ 20% for the period of 11 months as instructed based on email from Head of Group HR, Governance & NE dated 12/01/2022.</p>
Corrections:	Estate management has identified the amount shorts in the calculation of the salary of MTG Drivers. The amount has been arranged for reimbursement and will be credited in July 2023 salary.
Root Cause Analysis:	<ol style="list-style-type: none"> Lack of monitoring on the system for DOE % in a monthly basis. The DOE was pre-set to be @ 20% since January 2022. The DOE @ 17% was changed in the system in March 2022. Upon noticing the changes in DOE in January 2023, the management immediately consulted IT to change it back to 20%.
Corrective Actions:	Assistant manager to review on the DOE allocation in the system before payment being made to workers in a monthly basis.
Assessment Conclusion:	<ol style="list-style-type: none"> The estate management have identified the amount of underpaid wages to the MTG Drivers. The underpaid wages was computed and available in the document "Under Paid Wages For MTG Driver (QG) From Mar 2022 – Jan 2023". The estate management have obtained approval from the RGM, Central West Region, to reimburse the underpaid wages to the MTG Driver. The request memo dated 28/07/2023, undersigned and approved by the RGM, Central West Region and RCEO, Central West Region was available for verification. All MTG Drivers have been reimbursed of the underpayment at the month of August 2023 (July 2023 Payslip). The payslips for all MTG Drivers were verified to have included the underpayment, categorised as "Incentive Harvesting". 1 worker was verified to have repatriated. The management have deposited a cheque to the workers bank account amounting to the underpayment. Documents were available for verification. Another worker had been missed out during the under payment computation. The amount has then be calculated and issued a "Variable Allowance Form", where the amount will be credited in the August Payslip. All documents were available for verification. The DOE allocation is printed out from the system by the assistant managers at the month end before payments are being finalised. The allocations are checked and approved by the assistant manager before payments are being made. Records of "Division of Earnings – Oil Palm Harvesting" that have been approved by the assistant manager for the month of July 2023 and August 2023 were available for verification.

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	The implementation of the correction and corrective action plan to address the raised critical non-conformity was able to close the issue. Therefore, the critical non-conformity was successfully closed on 30/08/2023.
Verification Statement	Based on verification of sampled pay slips of the MTG drivers for the month of July 2023, December 2023, and May 2024, at the sampled estates, the 20% rate of payment was continuously delivered accordingly. This has also been confirmed by the sampled MTG drivers through interview. The implementation of corrective actions found to be effective and no recurrence of non-conformance. Thus, the NCR remains closed.

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

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

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2221809-202207-M1	Critical	6.2.4	07/07/2022	Closed out on 06/10/2022
2221809-202207-M2	Major	4.2.3	07/07/2022	Closed out on 06/10/2022
2221809-202207-M3	Major	6.7.3	07/07/2022	Closed out on 06/10/2022
2221809-202207-M4	Major	7.2.10	07/07/2022	Closed out on 06/10/2022

2221809-202207-N1	Minor	3.3.2	07/07/2022	Closed out on 06/07/2023
2221809-202207-N2	Minor	7.3.2	07/07/2022	Closed out on 06/07/2023
2364282-202306-M1	Critical	1.1.3	06/07/2023	Closed out on 30/08/2023
2364282-202306-M2	Critical	6.2.2	06/07/2023	Closed out on 30/08/2023
2517622-202407-M1	Critical	3.6.1	05/07/2024	Closed out on 18/09/2024
2517622-202407-M2	Critical	7.10.3	05/07/2024	Closed out on 04/09/2024
2517622-202407-N1	Minor	2.1.2	05/07/2024	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 SOU18 Diamond Jubilee 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 standard requirements have been incorporated as an assessment finding.

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

Stakeholders contacted		
Type of Stakeholder	Stakeholder name / organization	Means of communication
Communities	Kg Txxxx	Face to face
Communities	Wxx Gxxxx	Face to face
Contractor	Sxxx Yxxxx Sdn Bhd	Face to face
Contractor	Mxxx Enterprise	Face to face
Contractor	Kxx Sxx Lxx Sdn Bhd	Face to face
Contractor	Rxxxx Sxxxx Sdn Bhd	Face to face
Communities	SKJT xxxx	Face to face
NGO	NUPW Melaka	Face to face
Internal	Estates and mill workers	Face to face
Internal	NUPW workers representative	Face to face
Internal	Gender Committees	Face to face

Stakeholders comment

1	<p>Feedbacks: <u>Local communities (Kg Txxxx and a durian orchard owner) representatives</u></p> <p>The surrounding communities have a very good relationship with the company and has been transparent to the villagers and surrounding communities should there be any issues of concern. There has been no unresolved issue so far. The company has also always invited the village representative to attend meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any. In term of contribution, the company has allowed them to use the estate roads to reach their destinations. Occasionally, contributions in term of monetary or monetary were also delivered during religious and non-religious events.</p> <p>Audit Team verification and response: No further issue.</p>
2	<p>Feedbacks: <u>Contractors – FFB Transport, POME Transport, and replanting works</u></p> <p>The contractors have a good relationship with the company where they have been providing their services for many years. The contractors also mentioned that the award of contracts was done through fair and unbiased tendering process. The management and staff of the operating units have also been very accommodating should there be any issues of concern. The company has also always invited the vendor to attend the stakeholder meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any. When comes to the recent increase price of diesel, the company has been very understanding and effort to revise the payment rates has been initiated.</p> <p>Audit Team verification and response: No further issue.</p>
3	<p>Feedbacks: <u>Gender committee representatives</u></p> <p>Each of the operating unit has their own gender committee. Among the main objectives of the committee are:</p> <ul style="list-style-type: none"> – To raise awareness, identify and address issues of concerns, opportunities, and areas for improvement for workers especially women – To create a safe community within operations where women can raise issues and concerns at work and in their lives with a focus on zero tolerance to sexual harassment and gender-biased violence <p>The committees are required to plan annual activities to achieve the objectives. Among the important activity planned were briefing/training to female workers/employees on understanding the meaning of sexual harassment and domestic violence and method of reporting should it happen. The management has also been very supportive with the programmes in term of financial, facilities and other resources. Since the last audit, there was no sexual harassment nor violence case reported. Apart from that the committees were also assigned to conduct the new mother assessment.</p> <p>Audit Team verification and response: No further issue.</p>
4	<p>Feedbacks: <u>Field workers (estates and mill) and Union representatives</u></p> <p>The management has been very accommodative to the workers in term of welfare. Safety at the workplace is a top priority imposed by the management. Adequate trainings and free PPE were among the main needs</p>

	given by the management. With regards to welfare, housing facilities, water & electricity supply were always maintained in good conditions. Workers were also made to understand the mechanism to lodge complaint or grievance should there be any. There has been no issue with regards to delivering the terms & conditions stipulated in the employment contract so far.
	Audit Team verification and response: No further issue.

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 all estates has undergone the 2 nd cycle of planting.					

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



3.5 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that SD Guthrie Berhad SOU 18 Diamond Jubilee POM and Supply Bases has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Sime Darby Plantations Berhad SOU 18 Diamond Jubilee POM and Supply Bases is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: NOR HALIS ABU ZAR	Name: Shylaja Devi Vasudevan Nair
Company Name: BSI SERVICES MALAYSIA SDN BHD	Company Name: SD Guthrie Bhd
Title: CLIENT MANAGER	Title: Head, Sustainability Compliance Unit, Group Sustainability Dept.
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 10/07/2024	Date: 02/09/2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	The documents that are specified in the RSPO P&C were made available on site at all the sampled operating units. Among the publicly available documents are land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, summary reports, company policies and continual improvement plans. Reports and policies are accessible at the company's website: https://www.sdguthrie.com/sustainability/reports-policies-and-statements	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	All the related information was available in Bahasa Malaysia and English and accessible to the relevant stakeholders upon request.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Should there be any request for information that are specified in the RSPO P&C from any stakeholders, record of request will be maintained in a few ways such as Communication Logbook, and filing of correspondence documents e.g., email printout, and letter. There has been no request for information that are specified in the RSPO P&C from any stakeholders since the last assessment.	Complied

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1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Addressed in SD Guthrie Berhad Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, Procedure for External Communication, version 1, issue date 01/11/2008). The procedure has the details about the process of handling complaints from stakeholders and the time frame for external communication to be dealt with. The time frame to provide feedback is within two weeks of the date of receipt for communication and within one week of the completion of the investigation.</p> <p>The Mill Manager has appointed Mill Assistant Manager as the management system officer to handle any issue related to RSPO/ISCC/SCCS/ISO. Whereas the Estate Managers have appointed their Assistant Managers to be the person in charge for social issues.</p> <p>Consultation with stakeholders can be held as and when required apart from the company's routine annual stakeholders meeting. The last stakeholder consultation meetings were conducted on various dates depending on which operating units. Based on the minutes, among the attendees were local communities, government agencies, contractors, and representatives from nearby schools. Feedbacks were recorded in the minutes of meeting and have been incorporated into the social management plan.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Each operating unit has their own list of stakeholders which is updated from time to time. Generally, the stakeholders are of various categories such as local communities, surrounding landowners/premises, authorities, contractors, suppliers/vendors, FFB suppliers and NGOs to name a few. The lists are completed with the information about nominated representatives, contact numbers, e-mail addresses and location addresses.</p>	Complied

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Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad has addressed its policy for ethical conduct in Code of Business Conduct (COBC) and to be implemented in all business operations and transaction, including recruitment and contracts. The document is publicly available on the company's website. SD Guthrie Berhad has imposed the implementation of the COBC to all its contractors and vendors by signing the Vendors Integrity Pledge (VIP) document. Copies of the signed pledges were kept by all the operating units and made available for verification. Interview with the sampled contractors confirmed that they have acknowledged the VIP.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>At the operating unit level, the system to monitor is mainly by regular checking of the contractors' legal compliance and employees' welfare by the management.</p> <p>Apart from that, annual internal audit, which was last conducted on 03/04/2024 (Bukit Asahan), Diamond Jubilee POM (04/04/2024), 02/04//2024 (Welch), and 05/04/2024 (Diamond Jubilee Estate) is also one of the methods to ensure whether the management is monitoring the compliance and implementation of the policy of the counterparties.</p> <p>Since the last assessment, there has been no report related to violation of ethical conduct. Should there be any, it will be handled according to Clause 13 of the COBC.</p>	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements	SD Guthrie Berhad SOU 18 Diamond Jubilee POM Certification Unit continues to comply with all verified legal requirements. Compliance	Complied

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	<p>- Critical (Major) compliance -</p>	<p>to each applicable law and regulation is monitored by the operating units and HQ. The sampled mill and estates had obtained and renewed license and permits as required by the law. Among others the licenses/permit verified were:</p> <p>Bukit Asahan Estate</p> <ol style="list-style-type: none"> 1. MPOB Licence #527615002000 valid from 01/03/2024 until 28/02/2025 2. Air Receiver #MK PMT 4942 valid until 07/09/2024 3. Petrol permit #B.PGK(M)PK/1/2017(P) valid until 24/01/2025 4. Diesel permit #SK(M)051/2005(D) valid until 24/01/2025 5. Weighbridge inspection #D153958 inspected by De Merology dated 03/10/2023. <p>Diamond Jubilee POM</p> <ol style="list-style-type: none"> 1. MPOB Licence #500288804000 valid from 01/10/2023 until 30/09/2024 2. Weighbridge calibration D046580 inspected by De Metrology dated 09/08/2023. 3. Water abstraction licence #BKSAM01712 valid until 30/04/2025 4. DOE Licence #006085 valid until 30/06/2025 5. Boiler #MK PMD 80122 valid until 27/06/2025 6. Steriliser #MK PMT 311 valid until 20/05/2025 7. Palm Oil Crane #PMA58532 valid until 20/05/2025 8. Competence person #CePPOME/2321098 to Assistant Engineer NRIC 870802-XX-XXXX 	
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		<p>9. Competence person #CePSWaM/2217814 to Assistant Engineer NRIC 870802-XX-XXXX</p> <p>10. Air Receiver #MK PMT 537 valid until 15/09/2024</p> <p>Welch Estate</p> <p>1. MPOB Licence #522499002000 valid from 01/08/2024 until 30/07/2024</p> <p>2. Air Receiver tank #JH PMT 22626 valid until 16/07/2024</p> <p>3. Diesel and permit licence #J006055 valid from 12/08/2021 until 11/08/2024</p> <p>4. Weighbridge calibration #D228246 inspected by De Metrology dated 15/05/2024</p> <p>5. Wages deduction permit #BHG.PU/9/129JLD33(53) for Electricity from JTK dated 06/07/2017</p> <p>Diamond Jubilee Estate</p> <p>1. MPOB Licence #522967002000 valid from 01/09/2023 until 31/08/2024</p> <p>2. Diesel permit #M001059 valid until 24/10/2024</p> <p>3. Air Receiver tank #MK PMT 5827 valid until 13/11/2024</p> <p>4. Abstraction licence #BKSAM01708 valid until 18/04/2025</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>The operating units have maintained compliance with legal requirements through established and implemented documented procedures, as outlined in the Estate/Mill Quality Management System, Level 2: Standard Operating Manual, specifically Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. This mechanism ensures adherence to legal and</p>	Non-compliance

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		<p>other requirements and is documented in the EQMS & MQMS (Estate & Mill Quality Management System), which is distributed to all operating units. The GSQM Department and respective operating units are responsible for identifying, managing, updating, and tracking legal requirements, as well as monitoring legal compliance status.</p> <p>Furthermore, all operating units maintain a Legal & Other Requirements Register (LORR) that covers all necessary regulatory requirements. A legal register dated June 2024 lists additional applicable laws, including:</p> <ul style="list-style-type: none">• Minimum Wages Order 2022• Fire Service Act 1988 (Act 341) Amendment 2020• Human Resources Development Act 2001• Anti-Sexual Harassment Act 2021• Employees' Social Security (Amendment) Act 2022• Employees' Insurance System (EIS) (Amendment) Act 2022• Control of Supplies Act 1961• Employment (Amendment) Act 2022• Occupational Safety and Health (Plant Requiring Certificate Of Fitness) Reg. 2024 <p>The monitoring to ensure legal compliance was not effectively implemented.</p> <p>The canteen at Welch Estate has 3 staff involved in food handling. Typhoid injection has been taken for all staffs. However, it was found that only 1 of them has attended the MOH approved food handling course while the other 2 staff have not. This is not in-line</p>	
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		with the Food Hygiene Regulations 2009. Thus, Minor NC was raised.	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained as per verification during site visit. Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through boundary marker (red/white painted with alternate ring) and physical boundary separated with construction of trenches and parameter road. This was confirmed through the field visit at found practiced was clearly visible. Boundary and monthly patrolling record was verified.</p> <p>Bukit Asahan Estate</p> <p>Sample checking at Field P10A neighbouring with Army Camp and P01C neighbouring with Hong Seng San Estate.</p> <p>Welch Estate</p> <p>Sample checking at Field P02C neighbouring with Felcra Sdn Bhd and P05A neighbouring with Rubber area.</p> <p>Bukit Asahan Estate</p> <p>Sample checking at Field P08A neighbouring with Kampung Tehel.</p>	Complied
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The certification unit had listed all contracted parties and documented in individual operating units' stakeholders list, which was updated from time to time. The lists were made available for verification at all the sampled units.</p>	Complied

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2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>All contracted parties/vendors were required to sign Vendor Integrity Pledge (VIP) and to comply with the following requirements:</p> <ul style="list-style-type: none"> - Vendor Code of Business Conduct (VCOBC) - All applicable laws and regulations related anti-bribery, fraud, and corruption <p>The operating units had carried out legal due diligence of all their contracted parties through internal audits, and performance review. Among the documents and records inspected by the operating units were possession of appropriate licenses/permits and payslips of the employers of the contractors to name a few.</p>	Complied
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>Generic clauses related to disallowing child, forced, and trafficked labour are available in Vendor Integrity Pledge (VIP). All contracted parties/vendors were required to sign Vendor Integrity Pledge (VIP) and to comply with the following requirements:</p> <ul style="list-style-type: none"> - Vendor Code of Business Conduct (VCOBC) - All applicable laws and regulations related anti-bribery, fraud, and corruption <p>Based on inspection of the contractors' workers identity documents and contract agreements, there was no evidence of child, forced and trafficked labour were employed.</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims 	<p>The mill receives Fresh Fruit Bunches (FFB) from its own supply base estates under SOU 18, as well as FFB diverted from other SD Guthrie certified SOUs. The FFB suppliers are listed in the Diamond Jubilee POM FFB Supplier list. The mill possesses information on the geo-locations, proof of land ownership status, and valid MPOB licenses for these suppliers.</p>	Complied

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	<ul style="list-style-type: none"> Valid MPOB license <p>- Critical (Major) compliance -</p>		
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 Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>The mill exclusively receives Fresh Fruit Bunches (FFB) from SD Guthrie Berhad's estates only. It has information on the geo-locations, proof of land ownership status, and valid MPOB licenses for these estates. Hence, there are no indirectly sourced FFB for Diamond Jubilee POM.</p>	Complied
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The business plan for the mill is reflected in the form of an annual budget (MPLAN) and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget (MPLAN) with 5 years projection (2024 – 2028). The annual budget contains the crop projection and the finance allocation for field operation and administration. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p> <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. In the 5 years business plan include items as follows:</p> <p>a) Palm oil mill</p> <p>i. Mill intake – FFB input</p>	Complied

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		<ul style="list-style-type: none"> ii. Production of CPO iii. Production of PK iv. Total Palm Oil Extraction v. Total Palm Kernel Extraction vi. Mill cost <p>b) Oil Palm Estate</p> <ul style="list-style-type: none"> i. Total crop projection and yield potential ii. Activity direct cost <ul style="list-style-type: none"> a. Mature upkeep b. Manuring c. Harvesting and collection d. Transportation e. Nursery iii. Estate administration <ul style="list-style-type: none"> a. Admin Cost iv. Labour overhead v. Road and bridges vi. Cost of production. <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2027) and well documented upon request.</p>	
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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>SD Guthrie Berhad SOU 18 Diamond Jubilee POM Certification Unit has established a long-range replanting programme until FY 2028. Replanting is planned for the fields older than 25 years, non-performance fields (yield) and Ganoderma infected palms. The total Ha for the projected replanting of sampled Estate are as follows:</p> <table><tr><td>Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Bukit Asahan</td><td>184.02</td><td>130.53</td><td>125.69</td><td>172.37</td><td>291.91</td></tr><tr><td>Welch</td><td>0.00</td><td>85.90</td><td>73.04</td><td>147.16</td><td>175.65</td></tr><tr><td>Diamond Jubilee</td><td>0.00</td><td>138.52</td><td>100.48</td><td>219.06</td><td>168.10</td></tr></table> <p>New Planting Conversion From Rubber to Oil Palm</p> <table><tr><td>Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Welch</td><td>248.98</td><td>290.97</td><td>0.00</td><td>0.00</td><td>0.00</td></tr></table> <p>Internal Social & Environment Impact Assessment (SEIA) Report has been conducted for SOU 18 Welch Estate (Conversion of Ex Rubber Plantation to Oil Palm Plantation) by Group Sustainability Department, SD Guthrie Berhad. Report was available dated 23/06/2023. Based on interview with management and site visit confirmed that the felling operation has been started and in progress for lining.</p>	Estate	2024	2025	2026	2027	2028	Bukit Asahan	184.02	130.53	125.69	172.37	291.91	Welch	0.00	85.90	73.04	147.16	175.65	Diamond Jubilee	0.00	138.52	100.48	219.06	168.10	Estate	2024	2025	2026	2027	2028	Welch	248.98	290.97	0.00	0.00	0.00	Complied
Estate	2024	2025	2026	2027	2028																																		
Bukit Asahan	184.02	130.53	125.69	172.37	291.91																																		
Welch	0.00	85.90	73.04	147.16	175.65																																		
Diamond Jubilee	0.00	138.52	100.48	219.06	168.10																																		
Estate	2024	2025	2026	2027	2028																																		
Welch	248.98	290.97	0.00	0.00	0.00																																		

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		<p>In section 4.0 conclusion stated "In conclusion, the project site is suitable for development of oil palm as there are no adverse Social and Environmental impacts resulting from the proposed development with</p> <p>effective management plans and controls. Estate management shall ensure all relevant national and local regulations/ requirements are met before land clearing activity take place and throughout the project development and planting phase.</p> <p>It is recommended that the findings of this SEIA (in Section 3) and the operations of new plantings to be further incorporated with the existing environmental and social management and monitoring plans, including of High Conservation Value (HCV) and Social Impact Assessment (SIA). The effectiveness of these plans shall be evaluated, monitored/improved through regular management review meeting".</p> <p>Among the conclusion statement based on environment section were:</p> <ul style="list-style-type: none">• The proposed new planting is not in any way affecting/ disturbing the existing source of water to the plantation worker• No river observed around and within the area to be converted to oil palm• None of the assessed projects are located around on slope 25 degrees or more.• No removal of excess land activities into water course• The project site does not fall on the boundary of sensitive areas as the HCV areas is not located within a horizontal distance of 50 meters from the new planting site	
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		<ul style="list-style-type: none"> There is no new building structures established during new planting There is no nearby stakeholder at the new project site. <p>Based on the verification, all action plan has been monitored and implemented.</p>	
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>SD Guthrie Berhad SOU 18 Diamond Jubilee POM Certification Unit held management reviews at their respective sites on a yearly basis. Among the matters discussed during the management review are as follows: -</p> <ol style="list-style-type: none"> 1. Introduction by Chairman 2. Results of Internal Audits covering RSPO & MSPO 3. Customer feedback 4. Status up preventive and corrective actions 5. Follow up actions from management review 6. Changes that could affect the management system 7. Recommendations for improvement 8. Improvement of the effectiveness of the management system and process 9. Resources need <p>The minutes of the meeting indicated that Internal audit findings were each thoroughly examined, and the corrective action plan were discussed. The management review was conducted at the respective operating units as follows:</p> <p>Bukit Asahan Estate: 11/05/2024</p>	Complied

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		Diamond Jubilee POM: 05/04/2024 Welch Estate: 19/04/2024 Diamond Jubilee Estate: 21/06/2024	
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	Bukit Asahan Estate <ul style="list-style-type: none"> • Introduction of new spraying tools such as ST104 for efficient spraying mechanism for mature upkeep • Allocation of budget for drain and roof repairing for linesite in 2024 for worker's safety. • Enforcement of Oil Palm Pal (OPP) in order to report any housing appliance which, need to be repair • Promoting of esime+ culture by briefing and sharing session with the workers to report any unsafe act and condition. Diamond Jubilee POM <ul style="list-style-type: none"> • To achieve 250,000 working hours without any Lost Time Accident • Enforcement of E-SIME+ platform among employees and workers in order to achieve 150 reports per month Welch Estate <ul style="list-style-type: none"> • Improvement of safety in operation by introduction of mechanical spraying which will reduce risk and hazard during spraying and increase productivity. 	Complied

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		<ul style="list-style-type: none"> Improvement of road access to avoid slippery road for tractors during infield collection. <p>Diamond Jubilee Estate</p> <ul style="list-style-type: none"> To fully operate using mechanization for core activities such as infield collection of FFB, manuring and spraying To optimized usage of chemicals by using STGEO machines and increase productivity of spraying 	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The reporting for the economic, social, and environmental metrics of the SD Guthrie Berhad SOU 18 Diamond Jubilee POM Certification Unit utilizes the RSPO metric template Version 2.1 (updated June 2021). All information filled in the template accurately reflects each operating unit of the Unit of Certification (UoC).</p> <p>Furthermore, the Annual Communication of Progress (ACOP) reporting for the year 2022 of SD Guthrie Berhad has been submitted to the RSPO Secretariat. This report is publicly available on the RSPO website at the following link: https://document.rspo.org/2022/Sime Darby Plantation Berhad ACOP2022.pdf</p> <p>Additionally, the PalmGHG data for this UoC has been submitted to the BSI Assessment Team prior to the audit and was approved after onsite verification by the CB using PalmGHG Version 4.</p>	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) for all operation in estate and mill are available during the audit. Generally, SD Guthrie Berhad has formulated Agricultural Reference Manual (ARM), 3rd Edition in December 2023, Sustainability Plantation Management</p>	Complied

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		<p>System and EQMS (Estate Quality Management System) for operation guidance to all their estates and mills. Among critical SOP as listed below:</p> <ul style="list-style-type: none"> • Estate Clinic Periodic Inspection, Doc. No. UM/HSE/SP/09, Edition 2024 • Permit To Work (PTW), Doc. No. UM/HSE/OCP/13, Edition 2023 • e-SIME+ System Procedure, Doc. No. UM/HSE/OCP/12, Edition 2023 • Safe Handling & Storage of Petrol at Employees' Housing Procedure, Doc. No. UM/HSE/OCP/15, Edition 2023 • Forced Labour Prevention Validation Procedure, Doc. No. UM/SWS/SOP/01, Edition 2023 • Incidents, Accidents and Non-Compliance Management Procedures, Doc. No. UM/HSE/SP/03, Edition 2022 • Workers Housing Management Procedure, Edition 2022 • Health, Safety & Environment Management System (HSEMS) Manual, Doc No. UM/HSE/MS/01, Edition 2021 • Safe Harvesting Procedure, Doc. No. UM/HSE/OCP/02, Edition 2021 • Personal Protective Equipment (PPE), Doc. No. UM/HSE/OCP/03, Edition 2021 • Emergency Preparedness & Response Procedures, Doc. No. UM/HSE/SP/02 • OSH Risk Management Procedure, UM/HSE/SP/01, Edition 2021 	
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		<ul style="list-style-type: none"> Managing Occupational Safety and Health (Noise Exposure) Regulation 2019 Compliance, Doc. No. UM/HSE/SP/06 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>There are various mechanism and methods for SD Guthrie Berhad to monitor estates and mills implementation accordingly. Among the program but not limited to are:</p> <ul style="list-style-type: none"> Estate Structured Crop Recovery Assessment (SCRA); Crop Losses & Crop Quality which is a scoring system for evaluate performance of each Operating Unit.: Fly by Visit by Headquarters and Region Office for monitoring of safety, infrastructure and culture element in mill and estates. Structured Estate Performance Assessment (SEPA) by Performance Monitoring Unit which focusing on Immature Management, Nursery Management, Manuring Management, Building & Facilities Management, EVIT, Ex-estate Cost Assessment Structured Oil Recovery Assessment (SORA) by Performance Monitoring Unit for palm oil mill Monthly Crop Recovery Assessment, for February 2024 	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>There are various mechanism and methods for SD Guthrie Berhad to monitor estates and mills implementation accordingly. Among the program but not limited to are:</p> <ul style="list-style-type: none"> Estate Structured Crop Recovery Assessment (SCRA); Crop Losses & Crop Quality which is a scoring system for evaluate performance of each Operating Unit. Details of visit by Performance Monitoring Unit (PMU) as table below: 	Complied

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		<table><tr><td>Estate</td><td>Date of visit</td></tr><tr><td>Bukit Asahan Estate</td><td>9-10/01/2024</td></tr><tr><td>Welch Estate</td><td>8-12/01/2024</td></tr><tr><td>Diamond Jubilee Estate</td><td>04/07/2024</td></tr></table> <ul style="list-style-type: none">Fly by Visit for safety and infrastructure monitoring purpose at mill on 14/03/2024.Structured Estate Performance Assessment (SEPA) by Performance Monitoring Unit which focusing on Immature Management, Nursery Management, Manuring Management, Building & Facilities Management, EVIT, Ex-estate Cost AssessmentStructured Oil Recovery Assessment (SORA) by Performance Monitoring Unit for palm oil millMonthly Crop Recovery Assessment, for Jan – May 2024In term of sustainability, there were RSPO & MSPO internal audit has been conducted by Sustainable Compliance Unit, Group Sustainability Department on 03/04/2024 for Bukit Asahan Estate, Diamond Jubilee POM on 04/04/2024, Welch Estate on 02/04/2024, and at Diamond Jubilee Estate on 01/04/2024.	Estate	Date of visit	Bukit Asahan Estate	9-10/01/2024	Welch Estate	8-12/01/2024	Diamond Jubilee Estate	04/07/2024	
Estate	Date of visit										
Bukit Asahan Estate	9-10/01/2024										
Welch Estate	8-12/01/2024										
Diamond Jubilee Estate	04/07/2024										
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.											
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected	New Planting Conversion From Rubber to Oil Palm	OFI								

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stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	Estate	2024	2025	2026	2027	2028
	Welch	248.98	290.97	0.00	0.00	0.00
<p>Internal Social & Environment Impact Assessment (SEIA) Report has been conducted for SOU 18 Welch Estate (Conversion of Ex Rubber Plantation to Oil Palm Plantation) by Group Sustainability Department, SD Guthrie Berhad. Report was available dated 23/06/2023. Based on interview with management and site visit confirmed that the felling operation has been started and in progress for lining.</p> <p>In section 4.0 conclusion stated "In conclusion, the project site is suitable for development of oil palm as there are no adverse Social and Environmental impacts resulting from the proposed development with</p> <p>effective management plans and controls. Estate management shall ensure all relevant national and local regulations/ requirements are met before land clearing activity take place and throughout the project development and planting phase.</p> <p>It is recommended that the findings of this SEIA (in Section 3) and the operations of new plantings to be further incorporated with the existing environmental and social management and monitoring plans, including of High Conservation Value (HCV) and Social Impact Assessment (SIA). The effectiveness of these plans shall be evaluated, monitored/improved through regular management review meeting".</p> <p>Among the conclusion statement based on environment section were:</p>						

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	<ul style="list-style-type: none">• The proposed new planting is not in any way affecting/ disturbing the existing source of water to the plantation worker• No river observed around and within the area to be converted to oil palm• None of the assessed projects are located around on slope 25 degrees or more.• No removal of excess land activities into water course• The project site does not fall on the boundary of sensitive areas as the HCV areas is not located within a horizontal distance of 50 meters from the new planting site• There is no new building structures established during new planting <p>Based on the verification, all action plan has been monitored and implemented.</p> <p>For the year 2023/2024, an Environmental Impact Assessment (EIA) was established to identify environmental aspects in all estate activities including the mill. This assessment was documented using Environmental Aspects Impacts Identification and Environmental Impacts Evaluation forms, covering all activities in the estates and mill. The EIA was conducted in accordance with established Standard Operating Procedures (SOP), as outlined in the SOP Standard Operating Manual, subsection 5.4: Planning, and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure. Sample of activity verified were:</p> <p>Estates</p> <ol style="list-style-type: none">1. Grass cutting	
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		<ol style="list-style-type: none"> 2. Parking vehicle 3. Herbicide spraying 4. Maintenance station 5. Store cleaning <p>Mill</p> <ol style="list-style-type: none"> 1. Steriliser 2. Boiler 3. Laboratory 4. EFB dumpsite 5. Final discharge <p>The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records:</p> <ul style="list-style-type: none"> • Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, (version 1; year 2008 Issue no. 1; dated 1 April 2009 Register) • Appendix 5.4.1c - Environmental Aspect and Impact Identification form (version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EIA) • Appendix 5.4.1d – Environmental Impacts Evaluation form (version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE) <p>The monitoring on the impact of mill and estates activities has been verified and found in order.</p>	
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		SEIA assessment has been conducted at March 2023 for a new development where a 248.98 Ha of rubber plantation (field no. R01A, R01B, R01B1, R13A and R14A) to be converted to oil palm plantation. However the identification of all related affected smallholders could be further improved. Thus, OFI was raised.	
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 SEIA, along with its management and monitoring plan, were continuously reviewed and updated with the participation of affected stakeholders, both internal among employees and external stakeholders, with the latest external stakeholder consultation meeting.</p> <p>The assessment identified various impacts related to compliance with legal requirements, workers' welfare, handling of complaints and grievances, and socio-economic impacts on surrounding communities.</p> <p>Each operating unit developed an SIA plan. The plan outlined both negative and positive impacts identified during the assessment, which were verified through implementation verification at sampled estates. Key implementation measures included:</p> <ul style="list-style-type: none"> • Contribution to local communities by the management. • Communication of policies, SOPs, and estate information through stakeholder meetings. • Appointment of responsible persons to monitor social and stakeholder issues. • Engagement with relevant stakeholders to obtain feedback through various meetings, including Union meetings, Gender Committee Meetings, Social Dialogue meetings, and Stakeholder meetings. 	Complied

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	<ul style="list-style-type: none">Timely resolution of workers' housing complaints, documented in the Oil Palm Pal (OPP) system, which records the status and complaints related to housing matters. <p>The management already establish the environmental management plan for Mill / Estate base on EIA and EIE and also department of environment requirement (<i>Jadual Pematuhan</i>). The plan for environmental as per below:</p> <table><tr><th>Improvement issue</th><th>Action Plan</th></tr><tr><td rowspan="2">Waste reduction</td><td>To properly manage all usage of oil with proper tracking</td></tr><tr><td>Improve / rectify all the leaking hydraulic oil and lubricant oil at machinery</td></tr><tr><td rowspan="3">People</td><td>Implement total productive maintenance and 5s activity in every station</td></tr><tr><td>Mill give support if worker need to do festival event</td></tr><tr><td>Mill management provide grievances platform for workers to complaint if any</td></tr><tr><td rowspan="2">Planet</td><td>Locate proper oil trap to avoid the chemical go into monsoon drain</td></tr><tr><td>Store schedule waste at specific area that mill have prepared for it</td></tr></table>	Improvement issue	Action Plan	Waste reduction	To properly manage all usage of oil with proper tracking	Improve / rectify all the leaking hydraulic oil and lubricant oil at machinery	People	Implement total productive maintenance and 5s activity in every station	Mill give support if worker need to do festival event	Mill management provide grievances platform for workers to complaint if any	Planet	Locate proper oil trap to avoid the chemical go into monsoon drain	Store schedule waste at specific area that mill have prepared for it	
Improvement issue	Action Plan													
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		<table><tr><td></td><td>Manage schedule waste that should be disposed by the authorized contactor for every 6 months</td></tr></table> <p>This has been monitored by the management unit with PIC, timeframe and the status of implementation.</p>		Manage schedule waste that should be disposed by the authorized contactor for every 6 months	
	Manage schedule waste that should be disposed by the authorized contactor for every 6 months				
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Social and Environmental Action Plans are available for each operating unit, containing comprehensive information on identified issues, management plans, Persons in Charge (PIC), and time frames for implementation. The input for these plans is gathered from various sources, including meeting minutes from:</p> <ul style="list-style-type: none">• Gender Committee and NUPW meetings,• Safety Meetings,• Complaints and requests from internal and external stakeholders, as well as muster briefings, and• Stakeholders' meetings. <p>These action plans serve as proactive measures to address social and environmental concerns identified through stakeholder engagement and internal discussions, ensuring timely and effective implementation of mitigation strategies.</p> <p>Sample verification was Based on the stakeholder meeting conducted by Welch Estate which minutes is dated 13/06/2024, there is a concern raised by Kg Bukit Keledang with regards to public road being contaminated with mud came from the contractors' lorry tyres assigned to extract rubber woods during rainy days. This issue has been solved by the management and evidence was available and it has been verified through interview with affected stakeholders.</p>	Complied		

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		<p>The management plan, established based on operations with significant environmental impacts, undergoes annual review. It outlines environmental issues, mitigation actions, monitoring plans, and assigns responsibilities for implementation oversight. Among the plan established were:</p> <ol style="list-style-type: none">1. Environmental management plan<ul style="list-style-type: none">- To review EAI/EIE for any changes in operation- Create further awareness on recycling among workers through training- Monitoring of estate quarters2. Waste Management Plan<ul style="list-style-type: none">- Maintain inventory of SW- Inventory for storage of SW- Put signages and centralised all the waste of scrap iron bay3. Pollution Prevention Plan<ul style="list-style-type: none">- Ensure the preventive maintenance vehicles checklist were in place. Regularly inspection is carried out to these vehicles.- To place a tray under neath the vehicles4. Water Management Plan<ul style="list-style-type: none">- Water supply to purchase from SAMB- Awareness of water consumption	
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		<ul style="list-style-type: none"> - To carry out immediately repair of broken pipelines and identify any leakages. <p>5. IPM Management Plan</p> <ul style="list-style-type: none"> - Intensive planting of beneficial plant - Fixing barn owl box achieve target ration 1:10 - IPM Bagworm refreshment training 	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The Human Resource Department in SD Guthrie Berhad HQ has established SOP for Hiring of Local Workers dated 01/12/2019 and Migrant Worker Responsible Recruitment Procedure dated 20/08/2021 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 documents are available to workers upon request.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Recruitment of workers is carried out by SD Guthrie Berhad's Workforce Management Unit at HQ level. At the operating units, application forms, interview assessment form, medical check-up report, copy of identification documents and employment contract for the sampled newly recruited employees were made available for verification. These are among the pre-requisites spelt out in the recruitment procedure.</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>According to OSH Risk Management Procedure ver. 1, which effective on 09/03/2021, stating that monitoring and review of HIRARC shall be conducted when:</p>	Non-compliance

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		<p>1. Significant changes in work activity, process, practices or procedures</p> <p>2. Change in working environment including changes in organization structure and personnel changes</p> <p>3. Evidence that control measures are not working as intended e.g., accidents, incidents, and equipment's failure hazard reports.</p> <p>4. When directed by the Director General DOSH</p> <p>Bukit Asahan Estate</p> <ul style="list-style-type: none"> • HIRARC was last reviewed on 26/02/2024, on FFB cutting activity due to accident occurred on 22/02/2024. The last time incident is 21 days and has been reported accordingly. • Chemical & Health Risk Assessment (CHRA) has been conducted on 07/07/2020, Ref. No. HQ/15/ASS/00/363-2020-109 by assessor with DOSH Registration No. HQ/15/ASS/00/363. The assessment covered 8 work units which includes premix area, field spraying, field manuring, field rat biting, field trunk injection, line site fogging, workshop and store, diesel refilling & scheduled wasted store. • Latest Medical Surveillance conducted 15/05/2024, Ref No. HQ/20/DOC/00/00519 with KXXXX KXXXXXXX One Medic Cawangan Gangsa involving 50 workers. Report of the medical surveillance was available for review and no further medical concerns was noted. • The estate completed its Baseline Noise Risk Assessment on 13/08/2020, report no. HQ/LPROYKPEB/20/00271 conducted by an assessor with DOSH registration no. HQ/16/PEB/00/158 – workshop, tractor driver, blower operator, and loose fruit 	
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		<p>sieve operator.</p> <ul style="list-style-type: none">• Additional Noise Risk Assessment was added for racker operator, ST104 Operator, Carabao Operator and Geo Spray Opeartor on 17/10/2022, Doc No. NRA/Bukit Asahan Add/12-22/2)• Latest audiometric test was conducted on 06/05/2024 which involved 32 workers. 19 of them has normal result while the other 13 workers have abnormal result which required for further medical examination including bone induction within 30 days from date of screening test. The follow up medical exam was conducted, and results are available and reviewed. It was noted that all of them has non-occupational results and required to continue conduct annual audiometric test <p>Diamond Jubilee POM</p> <ul style="list-style-type: none">• HIRARC was last reviewed and updated on 29/02/2024 following a minor injury incident involving the chargemen. Additionally, there are other updates on 25/01/2024 due to new machineries installed which are High Speed Separator and Rapid tank as well as on 14/02/2024 for Oil Recovery Station following to minor accident.• Chemical & Health Risk Assessment (CHRA) has been conducted on 08/07/2020, Ref. No. HQ/15/ASS/00/363-2020-107 by assessor with DOSH Registration No. HQ/15/ASS/00/363. The assessment covered 7 work units which includes mill laboratory, Effluent Treatment Plan Laboratory, Boiler, Workshop, Kernel Plan, Water Treatment Plant and store, diesel refilling & scheduled wasted store. Supplementary of CHRA report dated 06/05/2024, Ref. No.	
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		<p>HQ/15/ASS/00/363-2024-0031 was reviewed due to additional of chemicals used by mill.</p> <ul style="list-style-type: none">• Mill completed its Audiometric Test on 16/10/2023, report no. PRO/OCT/23(SDPBKKSDJ/30) by assessor with DOSH registration no. JKPP/2021/11-04/00043. 10 workers were found to have abnormal audiometric test and required to under medical examination including bone conduction within 30 days from the date of initial screening. While other 7 workers have standard threshold shift (STS) which required retest of audiometric test within 3 months from the initial screening date. All of them pass the retest of audiometric test on 15/01/2024, Ref. No JKPP/2023/11-04/00043. Additionally, baseline for 3 new workers was conducted on 01/02/2024, Ref. No. PRO/FEB/24(DJOM/3).• Baseline Noise Risk Assessment was conducted on 04/02/2020 by assessor with DOSH reg. no. HQ/16/PEB/00/158. There is additional Noise Risk Assessment conducted for Boiler Station, Fuel Retrieval and Biocatalyst Area, Ref. Report No. HQ/22/MRA/00/00158-2022/10/1. Meanwhile on 23/04/2024, other additional NRA also conducted for SORS operator, Oil Room Operator, Grass Cut Operator, Tractor Driver and Backhoe Driver.• Medical Surveillance was conducted from 15/02/2024 to 05/03/2024 involving 17 workers who exposed to hexane, manganese and chromium. 2 of them were required to retest due to abnormal result. The verified retest results for both workers on 21/05/2024, confirmed that they were fit to continue working. <p>Welch Estate</p>	
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		<ul style="list-style-type: none"> • HIRARC was last reviewed on 19/06/2024, on FFB cutting activity due to accident occurred on 05/06/2024. The last time incident is 1 days and has been reported accordingly. • Chemical & Health Risk Assessment (CHRA) has been conducted on 10/06/2020, Ref. No. HQ/15/ASS/00/363-2020-084 by assessor with DOSH Registration No. HQ/15/ASS/00/363. The assessment covered 12 work units which includes premix area, field spraying, field manuring, field rat biting, field trunk injection, line site fogging, workshop/garage and store, diesel refilling & scheduled wasted store, Preservation (rubber), Stimulation (rubber), Fumigation (rubber) and Pest & Disease (rubber). • Latest Medical Surveillance conducted 12/02/2024, Ref No. 019/OHD/2024 with registered Occupational Health Doctor (OHD), Reg. No. HQ/08/DOC/00/545. 10 workers were involved among sprayers, foggers, manurers and workshop personnel. Report of the medical surveillance was available for review and no further medical concerns was noted. • The estate completed its Baseline Noise Risk Assessment on 15/07/2020, report no. HQ/LPROYKPEB/20/0027q conducted by an assessor with DOSH registration no. HQ/16/PEB/00/158 – workshop, tractor driver, blower operator, and grass cutter activity. • Latest audiometric test was conducted on 13-14/02/2024 and 23/04/2024 which involved 11 workers. All of them has normal result and continue with annual audiometric test. <p>Diamond Jubilee Estate</p>	
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		<ul style="list-style-type: none"> • HIRARC was last reviewed on 25/01/2024, on FFB cutting activity due to accident occurred on 05/06/2024. The last time incident is 1 days and has been reported accordingly. • Chemical & Health Risk Assessment (CHRA) has been updated on 07/05/2024, Ref. No. HQ/15/ASS/00/363-2024-0032 by assessor with DOSH Registration No. HQ/15/ASS/00/363. The assessment covered 12 work units which includes premix area, field spraying (manual application), field spraying (machinery application), field manuring (manual application), field manuring (machinery application), field rat biting (manual application), field bat rating (machinery application), field trunk injection, line site fogging, workshop/garage and store, diesel refilling & scheduled wasted store. • Latest Medical Surveillance conducted on 05/02/2024 and 07/02/2024, Ref No. 019/OHD/2024 with registered Occupational Health Doctor (OHD), Reg. No. HQ/17/DOC/00/0094. 13 workers were involved among sprayers, foggers, manurers and workshop personnel. Report of the medical surveillance was available for review • The estate completed its Baseline Noise Risk Assessment on 10/08/2020, report no. HQ/LPROYKPEB/21/00298 conducted by an assessor with DOSH registration no. HQ/16/PEB/00/158 – workshop, tractor driver, blower operator, MTG driver and Loose Fruit siever Operator. • Latest audiometric test was conducted on 05-07/02/2024 which involved 24 workers. All of them has normal result and continue with annual audiometric test. <p>H&S procedures and mitigation plans related HIRARC and CHRA was not fully implemented.</p>	
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		<p>Diamond Jubilee POM</p> <p>During an observation and site visit at the ramp, it was discovered that one of the contractor's drivers from Diamond Jubilee Estate was wearing casual shoes instead of safety boots. This does not comply with the HIRARC- Ramp Activity updated on 29/02/2024, which requires all lorry drivers to wear safety shoes within the mill compound.</p> <p>Diamond Jubilee Estate</p> <p>The following containers were used to contain chemicals without any proper re-labelling in accordance with CHRA (OSHA), USECHH Regulation, 2000, Reg. 21: Diamond Jubilee Estate (Bukit Kajang Division)</p> <p>1) 2 bottle of Petrol and 2 bottle of Lubricant were stored in the container without any labelled.</p> <p>2) Empty 20 liter chemical mixing container was left unattended at Tractor parked in the workshop</p> <p>Thus, Major Nc was raised.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Occupational Safety & Health Plan for the year 2024 that has been prepared by certification units. The effectiveness of the plan was monitored through various monitoring record and inspection such as:</p> <ul style="list-style-type: none"> Monthly PPE monitoring for workers handling chemicals; spraying activities, rat bait application, tractor driver and ST104 pump application. Workplace inspection, dated 04/05/2024, and 07/02/2024 – Guard post, main office, chemical store, road condition, pre-mix area, fertilizer store, scheduled waste store, workshop and diesel tank. 	Complied

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		<ul style="list-style-type: none"> • Accident & incident reporting; JKPP 6, JKPP 7 and JKPP 8 • Medical surveillance as conducted annually by operating unit ; 15/05/2024 (Bukit Asahan Estate), 15/02-05/03/2024 (Diamond Jubilee POM) and 12/02/2024 (Welch Estate) and 07/02/2024 for Diamond Jubilee Estate. • Chemical exposure monitoring by implementation control measure recommended by CHRA assessor every 5 years. • Audiometric test as conducted annually by operating unit; 16/05/2024 (Bukit Asahan Estate), 13-14/02/2024 and 19/03/2024 (Diamond Jubilee POM), 23/04/2024 (Welch Estate) and 05-07/02/2024 	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>All operational units within SOU 18 have established and documented a training plan based on an annual training needs analysis. The Training Need Analysis and Training Schedule for FY 2024 were reviewed, covering all job designations, including contractors. The training program encompasses areas such as Safety, Environment, and Management Systems. There are no scheme smallholders or out-growers within SOU 18.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units retained records of the conducted training sessions. Reviewed the training records as follows:</p> <p>Bukit Asahan Estate</p> <ul style="list-style-type: none"> • Hearing Conservation Training, dated 27/06/2024 • Chemical Handling and Emergency Response Training, dated 26/06/2024 	Complied

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		<ul style="list-style-type: none"> • PPE Enforcement Briefing, dated 25/06/2024 • Worker's Contract, Monthly Payslip and Documentation Briefing, dated 12/06/2024 • Safety Meeting and HIRARC Training, dated 07/05/2024 • Fire Safety Drills on Evacuation and Response, dated 27/03/2024 • Briefing on HCV Awareness among workers, dated 23/03/2024 • Briefing on 11 ILO Indicator, Medical Access, Company Policies, Freedom of Movement, OPP, Grievance Suara Kami Channel and Housing Standard, dated 21/03/2024 • First Aid Training, dated 22/02/2024. • Harvesting Training at Field 02H, dated 21/02/2024 • Tractor Driver Training and Service Maintenance by Kubota, dated 16/02/2024 <p>Diamond Jubilee POM</p> <ul style="list-style-type: none"> • HIRARC Training at Security Post, Office and Weighbridge, dated 24/06/2024 • 'Taklimat Bekerja dengan Membawa Alatan Berat, dated 29/02/2024 • Chemical Handling Briefing, dated 31/05/2024 • Hearing Conservation Training, dated 22/03/2024 • Health & Safety Induction Awareness Training, dated 29/05/2024 • RSPO/MSPO Refresher Training, dated 03/04/2024 	
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		<ul style="list-style-type: none"> • Social Dialogue Training for New Worker Representative, dated 26/03/2024 • Human Right Charter and Human Right Defender Awareness Briefing, dated 18/03/2024 • First Aid Treatment Case Training, dated 22/02/2024 • Safety Sharing and PPE Compliance Training, dated 29/01/2024 • Safety Working Procedure for Forklift Operation, dated 05/01/2024 • Building Evacuation Training with Jabatan BOMBA, Jasin, Melaka, dated 18/09/2023 <p>Welch Estate</p> <ul style="list-style-type: none"> • Safety Working Procedure Training, dated 27/06/2024 • Briefing on HCV Awareness, No Open Burning and Scheduled Waste Management, dated 26/06/2024 • Medical Surveillance Report Briefing, dated 26/06/2024 • Refresher Training for First Aid, dated 26/06/2024 • RSPO, MSPO, Policies, ILO and COBC Awareness Training, dated 21/06/2024 • Chemical Handling, and Chemical Spillage Briefing, dated 26/06/2024 • Scheduled Waste Training, dated 21/06/2024 • Tractor Driver Safety Training, dated 21/05/2024 	
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		<ul style="list-style-type: none"> • Environmental Impact Assessment (EIA) and High Conservation Value Training, dated 03/05/2024 • PPE Training, dated 26/04/2024 • Safety Briefing for Contractor; Wee Earth Venture, dated 20/04/2024 • Fire drill Training, dated 27/03/2024 • Maintenance of spraying equipment, calibration and safety training, dated 22/03/2024 • Briefing to contract workers on Freedom of Movement and Housing Benefit, dated 22/02/2024. <p>Diamond Jubilee Estate</p> <ul style="list-style-type: none"> • Harvesting Saefy and Technique Training, dated 20/09/2023 • Fire Drill Training, dated 29/06/2024 • Spill Kit Training, dated 29/06/2024 • Scheduled Waste Management Training, dated 28/06/2024 • PPE & HIRARC Briefing, dated 28/06/2024 • Hearing Conservation Training, dated 27/06/2024 • Refresher Training on ILO Indicator, dated 21/06/2024 • First Aid Training, dated 29/03/2024 • Refresher Briefing on Chemical Handling and Scheduled Waste Management, dated 20/06/2024 • Spraying with Inter-pump Training, dated 19/01/2024 • HCV Awareness Training, dated 21/03/2024 	
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		<ul style="list-style-type: none"> Awareness Training on Oil Palm Pal (OPP) and e-SIME+, dated 25/03/2024 RSPO, MSPO, Policies, Human Right Charter, Whistle Blowing and Estate SOP Refresher Training, dated 07/02/2024 Road Safety Briefing, dated 13/10/2023 	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The mill has designated personnel involved in supply chain certification and established a committee, as per the appointment letter signed by the Mill Manager. The identified personnel and committee members include Assistant Managers, Weighbridge Clerks, Operation Supervisors, Laboratory Analysts, FFB Graders, and Auxiliary Police.</p> <p>To ensure understanding and awareness of the supply chain certification system among all workers, the management conducted training sessions. The reviewed training sessions include:</p> <p>SCCS Standard Operating Procedure training conducted on 13/02/2024 by HQ.</p>	Complied
Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<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&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</p>	<p>FFB processed by SOU18 Diamond Jubilee POM were sourced exclusively from SD Guthrie RSPO certified estates, including both their own supply base and redirected FFB from SD Guthrie sister estates. No third-party crops or non-certified FFB were received by the mill. This was confirmed during the stakeholders' meeting, through transaction records, and via a site visit to the mill</p>	Complied

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	controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	weighbridge. Therefore, Diamond Jubilee Oil Mill is deemed to be Identity Preserved (IP).	
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>The Diamond Jubilee Oil Mill processes FFBs from its own supply bases, which include the Diamond Jubilee Estate, Bukit Asahan Estate, and Welch Estate, as well as from other SD Guthrie Berhad-owned plantations and estates certified against the RSPO Principles and Criteria (RSPO P&C). Despite incorporating the Mass Balance Module into the Scope of Certification, Diamond Jubilee continues to process only FFBs from these sources and strictly avoids accepting or processing FFBs from Outside Crop Producers (OCPs), such as independent smallholders, collection centers, or other third parties.</p> <p>Within 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, as specified by the Global Trading Marketing (GTM) Department.</p>	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that the certified mill could potentially produce is detailed in section 1 (Table 10) of this public summary report.	Complied

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3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>Based on verification via RSPO PalmTrace, it is confirmed that the mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform. SD Guthrie Global Trade Marketing Department handles the registration of RSPO PalmTrace. The mill is successfully registered in the PalmTrace system with the following details:</p> <ul style="list-style-type: none"> • License ID: CB153647 (Active) • Member Name: Diamond Jubilee Oil Mill • Member ID: RSPO_PO1000000187 • RSPO Membership Number: 1-0008-04-000-00 (SD Guthrie Berhad) • Type of Business: Oil mill 	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 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. 	<p>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <ol style="list-style-type: none"> The Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) has been revised at Section 9.2, 10.8, Appendix 2 for the inclusion of new clauses under Process Monitoring, Product Despatch, and Rules for FFB Diversion as to reflect the inclusion of RSPO IP Mills with RSPO MB Supply Chain as Scope Extension. The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024). <p>Complete and up to date records and reports in relation to RSPO SCCS were maintained and available for verification.</p>	Complied

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	<p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>Among the records available were Mass Balance Sheet, Internal Audit Reports, and SCCS Training records.</p> <p>c) Section 4.1 of Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) stated "The Head of Operating Unit shall have the overall responsibility for the implementation of this SOP".</p> <p>Section 4.2 of Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) stated "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 this SOP".</p> <p>Therefore, the Mill management have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated in Sustainable Supply chain and Traceability Procedure dated January 2024 Section 4.0 Responsibilities.</p> <p>d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the Sustainable Supply chain and Traceability Procedure dated January 2024 Section 7.0 Receiving FFB at the Mill. There is no issue on contamination since Diamond Jubilee Pom only received FFB from SD Guthrie certified estates.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p>	<p>i. The procedure to conduct annual internal audit is addressed in the Sustainable Supply chain and Traceability Procedure dated January 2024. Refer section 18.0 Internal Audit. Refer latest SCCS Internal Audit dated 04/04/2023. Based on the internal audit report and checklist, the elements of RSPO supply chain</p>	Complied

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	<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>were adequately covered including the RSPO Market Communications and Claims elements.</p> <p>ii. There was one non-conformity raised from the internal audit. For non-conformity, corrective action has been established to rectify the lapse found. The status of the non-conformity also be discussed in the management review meeting. Verified that all internal audits records and report was kept by the Mill.</p>	
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>Diamond Jubilee POM maintain the daily records of all certified and uncertified FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details. The mill has maintained records of FFB received such as Delivery Notes and Weighbridge operator. Sample of FFB delivery records:</p> <p>Incoming FFB</p> <p>Certified Supply Base</p> <p>Company: SD Guthrie Berhad</p> <ul style="list-style-type: none"> • Estate: Diamond Jubilee Estate • Certified No: RSPO591224 • Date: 20/06/2024 • Ticket Number: 148XXX • Vehicle Number: JPSXXXX • Field / Block: P 07H2 	Complied

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		<ul style="list-style-type: none"> • FFB Weight: 10.91 MT Company: SD Guthrie Berhad • Estate: Welch Estate • Certified No: RSPO591224 • Date: 30/04/2024 • Ticket Number: 147XXX • Vehicle Number: WTMXXXX • Field / Block: P 02C, P 02 C1 • FFB Weight: 11.07 MT <p>As per this current assessment conducted, there is no projected overproduction of certified tonnage. Therefore, no communication related to this initiated by the oil mill with the CB.</p> <p>Mechanism for handling non-conforming FFB and/or documents are detailed out at Section 11.0. of the Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024).</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <p>a) The name and address of the buyer;</p>	<p>Diamond Jubilee POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - IP</p> <p>a) The name and address of the buyer; BUYERXXXXXX</p> <p>b) The name and address of the seller; Diamond Jubilee POM</p> <p>c) The loading or shipment / delivery date; 25/04/2024</p>	Complied

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	<ul style="list-style-type: none"> b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> d) The date on which the documents were issued; 25/04/2024 e) RSPO Certificate Number: RSPO 591224 f) A description of the product: CPO IP g) The quantity of the products delivered; 39.80 Mt h) Any related transport documentation; DEGXXX i) A unique identification number: 012XXX <p>PK - IP</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; Diamond Jubilee POM c) The loading or shipment / delivery date; 17/04/2024 d) The date on which the documents were issued; 17/04/2024 e) RSPO Certificate Number: RSPO 591224 f) A description of the product: PK IP g) The quantity of the products delivered; 29.54 Mt h) Any related transport documentation; KFKXXXX i) A Unique identification number: 012XXX <p>Based on the review of MB Sheet and RSPO PalmTrace, it is confirmed that there is no CSPO/MB and CSPK/MB was sold or registered for licence period of Feb 2023 – Feb 2024.</p> <p>The implementation of the Supply Chain Requirements for Mills outlined in the RSPO Principles and Criteria 2018 remains unchanged for the East POM. This is related to the incoming FFBs,</p>	
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		outgoing CPO and PK, maintenance of RSPO PalmTrace records, and documentation upkeep, among others.	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>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>Diamond Jubilee POM has established Standard Operating Procedure related Outsourcing Activities. Refer Sustainable Supply chain and Traceability Procedure dated January 2024 with reference number SDP/GSD/202401/SCCS Section 13.0.</p> <p>i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Diamond Jubilee POM was for CPO and PK transportation.</p> <p>ii. Sighted the contract agreement between SD Guthrie Berhad and contractor:</p> <p>a) Diamond Jubilee POM has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB Supplier Certified and Non-Certified. The contract agreement and details like MPOB licence were kept in the file.</p> <p>b) Refer Contract Agreement between SD Guthrie Berhad and CPO Transportation (MXXXXX AXXXXX Sdn Bhd): Validity 01/11/2023 – 31/10/2024. Refer Letter of Extension Of Transportation Services For CPO Services For SD Guthrie Berhad Oil Mills in Peninsular Malaysia.</p> <p>c) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on agreements, transporter has no ownership of transported products and owned by buyer.</p> <p>d) The contract agreements specified that all transporters are required to fulfil and comply with applicable legal</p>	Complied

		requirements. Refer Section 8.0 Obligation, Undertakings and Covenants Of The Transporter.	
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 is 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 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>Record Keeping</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.</p> <p>ii) The retention period for maintaining the traceability records is 3 years as stated in the January 2024 with reference number SDP/GSD/202401/SCCS, Section 5.4.</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 Sheet Calculation Report. Among the information available in the format is date, FFB processed, OER, CPO amount (opening,</p>	Complied

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	<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>produced and closing) and transferred CPO (mill weight, refinery weight).</p> <p>iv) Not Applicable since the model use was IP</p> <p>For the outgoing CSPO/MB & CSPK/MB recording purposes, the management will incorporate the record in the existing “Month End Production Report” excel sheet. Based on the review, by using mock data, it is confirmed that the record is capable to meet the purposes.</p>							
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Verified OER and KER as below.</p> <table><tr><td>Month</td><td>OER</td><td>KER</td></tr><tr><td>July 2023 – June 2024</td><td>20.96</td><td>4.91</td></tr></table>	Month	OER	KER	July 2023 – June 2024	20.96	4.91	Complied
Month	OER	KER							
July 2023 – June 2024	20.96	4.91							
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Diamond Jubilee POM derives the extraction rates based on the actual extraction rate produced in the mill. Therefore, the accuracy is continuously maintained.</p>	Complied						
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Diamond Jubilee POM processed the FFBs from its owned supply bases (Diamond Jubilee Estate, Bukit Asahan Estate and Welch Estate) and other SD Guthrie Berhad owned plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C). The management of SD Guthrie Berhad decided to include Mass Balance Module into the Scope of Certification.</p> <p>As per Section 9.2 of the Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-</p>	Complied						

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		<p>2024), it stated that RSPO IP Mills to include RSPO MB Supply Chain is mainly to enable the sales of products through the RSPO MB Option.</p> <p>Despite adding the Mass Balance Module in the Scope of Certification, Diamond Jubilee POM still only processes FFBs from its owned supply bases. Furthermore, the mill strictly refrains from accepting and processing FFBs from Outside Crop Producers (OCPs), including independent smallholders, collection centers, or other third parties.</p> <p>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, as determined by the Global Trading Marketing (GTM) Department.</p>	
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Registration of transactions</p> <p>i) The registration of PalmTrace is carried out by the SD Guthrie Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Verified the registration of CPO Sale and PK Sale.</p> <p>ii) RSPO Certified Volumes Sold under as different scheme or conventional has been removed in the IT Platform. Sample of removal has been made for CPO and PK has been verified.</p>	Complied
3.8.17	Claims	In accordance with the Section 12.1 of Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) stated "Any claims regarding the use of	Complied

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	The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	<p>or support of certified oil palm products shall comply with the rules of respective certification scheme (e.g., RSPO, MSPO). For RSPO, refer to the latest RSPO Rules on Market Communication and Claims"., it is confirmed that no evidence has been found to date of any incorrect or inappropriate claims made at this specific unit.</p> <p>It has been verified that the relevant outgoing paperwork correctly indicates the necessary information on product claims, including the applicable Supply Chain model and certificate number. Additionally, during the audit, it was confirmed that the mill does not utilize the RSPO corporate logo or trademark logo, ensuring compliance with the guidelines regarding their use.</p>	
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	The SD Guthrie Berhad also has highlighted its RSPO membership and its commitment to the objectives and principles of RSPO via Sime Darby Plantation's (SDP) 2021 Sustainability Report, which stated "SDP was a founding member of the Roundtable on Sustainable Palm Oil (RSPO) in 2004. We started working towards 100% RSPO certification across our operations in 2008, making sustainable, ethically-sourced palm oil our rallying cry."	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none"> 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 	<p>Refer SD Guthrie Berhad (Formerly known as Sime Darby Plantation's) (SDP) 2023 Sustainability Report https://www.sdguthrie.com/investor-relations/annual-reports-and-presentations/. SD Guthrie has stated their targets and progress, i.e., 100% RSPO certified estates and mills, Support 100% scheme smallholders in Indonesia to obtain RSPO certification and Maintain RSPO certification for 100% of smallholders in PNG and Solomon Islands.</p> <p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p>	Complied

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		<ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, in the corporate communications, no usage of RSPO Trademark License.</p>	
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Based on the desktop studies, site visit and documentation review, it is confirmed that there is no usage of the RSPO corporate logo.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	Based on the desktop studies and documentation review, it is confirmed that there is no statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	Complied
4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." 	<p>Refer SD Guthrie Berhad (Formerly known as Sime Darby Plantation's) (SDP) 2023 Sustainability Report https://www.sdguthrie.com/investor-relations/annual-reports-and-presentations/ .SD Guthrie that the management has made statements that highlight their RSPO certification status and product-related claims in their corporate communication tools which complied with the requirement of RSPO Market Communication and Claims 2020.</p>	Complied

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	<ul style="list-style-type: none"> • "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." • "We are RSPO certified. Ask us for our RSPO certified products." 		
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <ol style="list-style-type: none"> "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)." 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>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>	As indicated on the RSPO website (https://rspo.org/members/1-0008-04-000-00/), SD Guthrie Berhad has been an RSPO member since 07 September 2004, holding RSPO Membership No. 1-0008-04-000-00. Therefore, this specific indicator is deemed Not Applicable for this UoC.	Not Applicable
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the UoC does	Complied

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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.	not make on-pack claims. However, it has been noted that off-pack claim is made by the UoC through shipping documents and invoices, specifically for RSPO-certified Crude Palm Oil (CPO) and Palm Kernel (PK). Additionally, an off-pack claim is also SD Guthrie Berhad (Formerly known as Sime Darby Plantation's) (SDP) 2023 Sustainability Report https://www.sdguthrie.com/investor-relations/annual-reports-and-presentations/	
5.1.2	Product-specific communications are voluntary.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the Product-specific communications are made voluntary by the management.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that there is no usage of any other trademark or label by the management.	Complied
5.1.5	If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below:	As Diamond Jubilee is an Oil Mill, which only processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable

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	<ul style="list-style-type: none"> RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. Both parties shall inform their certification body in writing about the agreement. The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	As Diamond Jubilee is an Oil Mill, which only processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, 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.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the UoC does not make on-pack claims. However, it has been noted that off-pack claim is made by the UoC through shipping documents and invoices, specifically for RSPO-certified Crude Palm Oil (CPO) and Palm Kernel (PK). Additionally, an off-pack claim is also stated in SD Guthrie Berhad (Formerly known as Sime Darby Plantation's) (SDP) 2023 Sustainability Report https://www.sdguthrie.com/investor-relations/annual-reports-and-presentations/	Complied

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5.2.2	<p>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.</p>	<p>Based on the documentation review and interviews with relevant personnel, it has been confirmed that when confirming the sale of certified palm oil products, Diamond Jubilee Oil Mill has adhered to the requirements of the RSPO Supply Chain Certification Standard (SCCS). Samples as below:</p> <p>CPO - IP</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; Diamond Jubilee POM c) The loading or shipment / delivery date; 25/04/2024 d) The date on which the documents were issued; 25/04/2024 e) RSPO Certificate Number: RSPO 591224 f) A description of the product: CPO IP g) The quantity of the products delivered; 39.80 Mt h) Any related transport documentation; DEGXXXX i) A unique identification number: 012XXX <p>PK - IP</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; Diamond Jubilee POM c) The loading or shipment / delivery date; 17/04/2024 d) The date on which the documents were issued; 17/04/2024 e) RSPO Certificate Number: RSPO 591224 f) A description of the product: PK IP 	Complied
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		g) The quantity of the products delivered; 29.54 Mt h) Any related transport documentation; KFKXXXX i) A Unique identification number: 012XXX	
5.2.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	As Diamond Jubilee is an Oil Mill, which only processes FFBS and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable
5.3 On pack claims			
5.3.1	<p>Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied

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5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 	Complied

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

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		<ul style="list-style-type: none"> License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	CPO produce for IP certified containing 100% oil palm content	Complied

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	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.	CPO produce for IP certified containing 100% oil palm content	Complied
Messaging			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> • The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org • RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org • Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org 	SOU18 Diamond Jubilee POM is producing crude palm product and does not involve in any labelling of end product.	Complied
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO Trademark that includes the tag "CERTIFIED"; or 	SOU18 Diamond Jubilee POM is producing crude palm product and does not involve in any labelling of end product.	Complied

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	<ul style="list-style-type: none"> RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 		
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	CPO produce for MB certified containing 100% oil palm content	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.	CPO produce for MB certified containing 100% oil palm content	Complied
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that there is no storytelling in product-specific communications made by the management.	Complied
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and 	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> License No.: RSPO-1106024 License Start Date: 23/06/2023 	Complied

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	<p>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.</p> <ul style="list-style-type: none"> The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	<ul style="list-style-type: none"> License Expiration: 22/06/2025 <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spelt out in the Human Rights Charter (HRC). The HRC was last revised in 2020. It promotes the human rights, safeguard democracy and its institutions and not violate the rights of others. It also recognizes the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, the company is committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration, and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as responding to complaints on any alleged threats made to them. Apart from posting on the company's website, the policy was also communicated to the stakeholders mainly through stakeholder meetings and workers' routine musters.</p>	Complied

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4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad prohibits any form of violence or harassment in their operation as per the above-mentioned policies. Based on interview with sampled workers and gender committee representatives, there has been no case reported with regards to violence and harassment. Should there be any such case, it can be addressed in accordance with the SD Guthrie Berhad's Standard Operating Procedure of Suara Kami Helpline, dated 15/04/2020 and workers are aware of the procedure.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad has established Grievance Response Standard Operating Procedure, dated 18/07/2022, where various methods for internal and external stakeholder to channel any complaints or grievances. Among the channels provided are workers representative meeting called social dialogue on monthly basis, gender committee meeting which focus on rights and needs of women employees, online platform such as 'Suara Kami', Oil Palm Pal (OPP) and whistleblowing. The procedure also categorized cases to determine whether the complainant's identity should be kept anonymous.</p> <p>The procedure had been communicated to the employees mainly through briefing on morning muster and display of the procedure on several notice boards. Interview with the sampled workers confirmed that they were aware of the channels.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Based on interview with the sampled workers and stakeholders, it was noted that the procedure has been communicated regularly. Among the methods of communication are morning muster, display of procedure and QR code at labour quarters and other strategic</p>	Complied

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		places. Workers were also able to demonstrate good understanding of the complaint and grievance procedure.	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>With regards to housing facility defects, SD Guthrie Berhad has developed its own online complaint platform called Oil Palm Pal (OPP) for workers to utilise using their smartphones. When interviewed, the workers found to be very well versed in explaining how to use the OPP. A meeting call Social Dialogue Meeting is also conducted on monthly basis between the management and the workers representatives. Any complaints raised from this meeting will then be registered in a tracking system called Social Dialogue Tracking System. This enables the management to record the complaints and monitor its action progress. The outcomes from this meeting are also registered in the tracking system. Among the information available in the system is details of complaints, name of complainant, action to be taken and timeframe. Verification of sampled issues and interview with workers confirmed that all the complaints/grievances were acted upon on timely manner.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad has the Grievances Response Standard Operating Procedure dated 18/07/2022 for handling communication related to social issues. Spelt out in the procedure, negotiation process will involve the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow. Furthermore, the company has established a policy on Protection of Human Rights Defenders (HRDs) of which saying in the event the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved</p>	Complied

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		internally. Nonetheless, since the last assessment, there was no case which needs to be escalated until such stage.	
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	<p>The certification unit obtained the information about any potential contribution mainly through stakeholders' consultation meetings or written request. Among the contribution requested and approved were</p> <ul style="list-style-type: none"> - providing facilities such as football field for sport event to nearby schools - permitting the use of estate premise for military training - using estates road for nearby communities such as villagers, orchard owner, etc. - monetary & non-monetary donations for various religious and non-religious events - Providing manpower and machinery to carry out various maintenance works for nearby schools and villages. <p>The CU has updated the progress of the above contribution in their Social Management Plan. Based on the status reported coupled with verification with the concerned stakeholders, the progress has been completely delivered.</p>	Complied
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.	The sampled operating units demonstrated their legal rights to use the lands by possessing land titles. All the copies of land titles were made available for verification. Summary of the land titles is as follows:	Complied

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	- Critical (Major) compliance -	Estates	No. of land titles	Total area (Ha)	Landowner	
		Diamond Jubilee	32	2,830.64	Sime Darby Plantation Sdn Bhd	
		Bukit Asahan	50	3,072.3149	The China Engineers (M) Sdn Bhd	
		Welch	6	1,449.6556 (9.2121 acquired by government for road)	Sime Darby Plantation (Peninsular) Sdn Bhd	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	SD Guthrie Berhad has developed Human Rights Charter, 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. There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.				Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.				Complied

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	- Minor compliance -		
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 -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	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 -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Complied

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4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied

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4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	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 -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			

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4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	SD Guthrie Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/04/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	Addressed in the above-mentioned procedure.	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>	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.	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>	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p>	SD Guthrie Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The	Complied

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	- Critical (Major) compliance -	procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Addressed in the above-mentioned procedure.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	There was no community that had lost access and rights to land as well as no expansion of plantation by the certification unit.	Complied
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.	Complied

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4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.	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>	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.	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>	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region.</p> <p>The mill didn't receive any FFB from smallholders or external FFB. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD.</p>	Complied

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5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD.	Not Applicable
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD.	Not Applicable
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD.	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD.	Not Applicable
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD.	Not Applicable
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).	The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or	Complied

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	- Minor compliance -	diversion from other certified estate from other SOU under SD GUTHRIE BERHAD. The weighbridge was calibrated as per requirement under "Akta Timbang Sukat 1972" valid for 1 year.	
5.1.8	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 -	No independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD.	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	No independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD. SD GUTHRIE BERHAD has established SOP to handle any grievances documented in Grievance Response Standard Operating Procedure, ver. No. 2 dated 18/07/2022.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	No independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial	No independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only	Not Applicable

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	competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	No independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	No training conducted for small holders as there is no independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	No independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	SD Guthrie Berhad has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political	Complied

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		affiliation, or age. They will facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy can be downloaded from https://www.sdguthrie.com/	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	Based on interview with the workers from different gender and nationalities, it was confirmed that there was no discrimination reported. The management has treated all employees equally for example in term of providing accommodation, medical treatment, job opportunity, wages rate, etc. There was also no charging of recruitment fees incurred for foreign workers.	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	SD Guthrie Berhad has developed a Promotion for Employees (Doc. No.: SDP/HRUM/2020/SOP01 dated 01/01/2020) and Career Progression for Workers Level (both local and foreign workers), to provide a guideline on promotion process to ensure all employees are given fair and equal opportunity based on the set requirements such as work performance and suitability of the position.	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	Based on interview with female employees at the sampled operating units, it was confirmed that there was no pregnancy test conducted prior the employment.	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	Each operating unit has their own Gender Committee to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. The committee organizes a meeting on quarterly basis. The last meetings were conducted on 14/05/2024 (Bukit Asahan Estate), 06/04/2024 (Diamond Jubilee POM), 28/05/2024 (Welch Estate), and 18/04/2024 (Diamond Jubilee Estate). Minutes of meeting were made available for verification. So far, there has been no issue	Complied

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		raised by the female workers as verified from the feedback forms and minutes of meeting.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Based on the sampled payslips, which consists of both genders, it was noted that workers were paid equally for the same job scope. They were paid according to the Minimum Wage Order 2022 and Collective Agreement between MAPA and NUPW without any form of discrimination. This was also evident through interview with sampled workers.	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	SD Guthrie Berhad has signed the Collective Agreement (For field/ oil palm harvesters/oil mill and other general employees) with NUPW [MAPA circular No. 12/2019, dated 02/04/2019]. Employment contract was established based on the collective agreement and available in all languages of which the workers are from. Samples of employment contracts were reviewed and found that the agreements were signed by the employees. Any new foreign workers will be inducted for the terms and conditions of employment contract and briefed on the company's policies, upon arrival to the operating units. The implementation of this practice was evident through interview with the sampled workers.	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in 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.	Based on sampled employment contracts the contracts were signed in dual language which is English and their home country language such as Bahasa Indonesia, Hindi, and Bangladeshi. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract. The extension contract has outlined the	Complied

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	- Critical (Major) compliance -	terms and condition according to the Collective Agreement, Employment Act and Minimum Wage Order 2022.	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	33 workers from various operations such as mill operators, harvester, field workers and general workers were sampled for evidence of compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. Based on verification of employment contracts, payslips, medical certificates, check-roll, punch cards, and interviews, there was no evidence of legal requirements being breached.	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Workers are accommodated at the housing complex quarters of the operating units without any charges. Subsidised water and electricity supply, and free medical treatment were also provided to all workers. Housing inspection was conducted weekly by the Medical Assistant using the Housing Complex/ Nest/ Community Hall Weekly Inspection Checklists (PIOA) as required by the Workers' Minimum Standards of Housing and Amenities Act 1990. Basic items such as mattress, pillows, and cooking utensils, were provided to workers upon joining the company.</p> <p>With regards to housing facility defects, workers can report their issues using the smartphone application called OPP. Based on interview, the workers were well versed in using the app and confirmed all issues were addressed in timely manner.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	There was no issue on accessibility to adequate and sufficient food supplies as sundry shops were available in most of the housing complex. Workers are also free to go to the nearby towns for more options of groceries. There has been no complaint received with regards to the price of supplies. Based on interview, the basic supplies were affordable.	Complied

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6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><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</i></p>	<p>The certification unit has provided decent living wage for both local and foreign workers based on SD Guthrie Berhad's prevailing wages assessment. Among the items included in the calculation were wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, transport allowance, telecommunication, and welfare, to name a few. Review of sampled pay slips and prevailing wage assessment report showed that the wages received complied with the Minimum Wage Order 2022.</p>	Complied
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	<p>methodology which may include independent studies by local experts in their respective region or country).</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>All the core works are performed by permanent and full-time employees. There was no temporary/casual worker being employed. Contractors are hired for task like replanting, transportation of FFB, POME, domestic wastes, and hiring heavy machinery.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad has developed Human Rights Charter where they respect Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, they will provide alternative means of employee engagement and grievance redressal. The policy has been communicated to the workers through musters and</p>	Complied

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		display on notice boards. Interview with the sampled workers confirmed that there has been no restriction by the employer for them to join any trade union.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request. - Minor compliance -	Each operating unit has their own union representative elected by the union members. Annual meetings were conducted between the management and the union representatives to address any issues on concern. The last meetings were conducted on the following dates: - Bukit Asahan Estate: 11/03/2024 - Diamon Jubilee POM: 03/04/2023, for 2024 planned to conduct in July - Welch Estate: 04/06/2024 - Diamond Jubilee Estate: 11/07/2023, for 2024 planned to do next week Issues raised during the meeting were recorded in the minutes of meeting which was made available for verification. Social management plan was thereafter developed to set up the actions to be taken to resolve the issues raised during the meeting.	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	Interview with the NUPW representatives and the workers confirmed that the election of the representatives were freely done by the workers without any influence or interference from the management.	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	SD Guthrie Berhad has developed Human Rights Charter where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal	Complied

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	- Minor compliance -	<p>Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography.</p> <p>They are eradicating the child labour in all their supply chain and not to employ anyone under the age of 18 years.</p> <p>All the contractors were required to read through Vendor COBC before they signed on the Vendor Integrity Pledge where they will be required to comply with labour and human rights. The contractors had also been briefed on the human right charter and prohibition of child labour. This has confirmed with the stakeholders through stakeholder consultation.</p>	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>Workforce Management Unit has developed SOP under Clause 3.1.14 LR14 – Recruitment Drive where the minimum requirement of the age is 18 years old. Age screening is based on identification documents and/ or passport and from the stated date of birth. The local employees were required to submit a photocopy of identification card during application of job to the management for verification purpose.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no young person employed by the company as their minimum age was 18 years old. This were verified through checking of the Employee Master Listing and through interview with the stakeholders.</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>The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders through stakeholders meeting or briefing with the contractors. This had also been confirmed through interview with the stakeholders and contractors.</p>	Complied

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	- Minor compliance -		
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	SD Guthrie Berhad has established Human Rights Charter where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. The policy has been communicated to the workers through musters and display on notice boards.	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	SD Guthrie Berhad has established Human Rights Charter where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy has been communicated to the workers through musters and display on notice boards.	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	Assessment for new mothers (with infants under 24 months) FY2024 were conducted by each operating unit's Gender Committee. Based on verification of the assessment report and interviews, among the needs identified were time allocated during working hours for breastfeeding and regular visits to clinics. The management had granted the identified needs to the new mothers.	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>	SD Guthrie Berhad has maintained the Terms of Reference for Gender Representative and Gender Committee (<i>Bidang Tugas untuk Wakil Jantina dan Jawatankuasa Jantina</i>) dated March 2021 where the committee will be on the certification unit level basis instead of operating unit. The objective of the gender committee is to improve	Complied

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		<p>awareness, identify opportunity and improvement and issue of the workers specifically on women. The committee will act as the mechanism to monitor and investigate if there is any sexual harassment, domestic violence, and abusive children in the operating unit. The frequency of the meeting is bimonthly.</p> <p>Apart from that, Grievances Response Standard Operating Procedure dated 18/07/2022 was implemented as well. The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with internal and external communications is described in Section 2.2 Flow chart procedure and Section 3.3 The time scale of investigation of the procedure.</p>	
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Based on interview with the sampled workers, and site visit, the following were observed:</p> <ol style="list-style-type: none"> a. No retention of documents. All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. b. No charging for recruitment fees c. No contract substitution. All the terms and conditions of the employment contract were delivered accordingly. d. No involuntary overtime. Workers are free to decline any offers for overtime work. e. No lack of freedom to resign. Workers are free to resign at any time as per stated in their employment contracts without any penalties. 	Complied

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		<p>f. No debt bondage. There is no evidence of any incidence of debt bondage. This can also be seen in the pay slips where there is no deduction of wages for any debt.</p> <p>g. No withholding of wages. There is no evidence of wages being withheld. Wages are fully paid on-line to individual's bank account and can be withdraw at any time.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad is implementing their Human Rights Charter where they committed the following:</p> <ul style="list-style-type: none"> - Providing equal opportunity - Respecting freedom of association - Eradicating any form of exploitation - Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs - Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking, and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. <p>Foreign workers were given induction training prior to commencement of their employment, where the above policy was explained. Moreover, they were provided with decent living condition and free from any form of discrimination. The sampled workers informed through interview that they were treated equally without any discrimination and allowed to join any trade union freely.</p>	Complied
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			

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6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>All estate's and mill management has established a Safety Committee, with members including a secretary, representatives from both the employer and employees. These appointments are in line with the appointment letter issued by the Estate Manager. The quarterly meeting agenda covers items such as matters arising from the previous meeting, reports from workplace inspections, updates on the training program and its implementation, discussions on safety issues in the workplace, review of accident cases, consideration of HIRARC, and other safety-related concerns.</p> <p>Reviewed latest safety minutes meeting for operating unit:</p> <table><tr><th>Operating Unit</th><th>3rd meeting (2023)</th><th>4th meeting (2023)</th><th>1st meeting (2024)</th><th>2nd meering (2024)</th></tr><tr><td>Bukit Asahan Estate</td><td>04/08/2023</td><td>07/11/2023</td><td>08/02/204</td><td>07/05/2024</td></tr><tr><td>Diamond Jubilee POM</td><td>17/08/2023</td><td>06/11/2023</td><td>02/02/2024</td><td>02/05/2024</td></tr><tr><td>Welch Estate</td><td>12/09/2023</td><td>12/12/2023</td><td>08/03/2024</td><td>30/05/2024</td></tr><tr><td>Diamond Jubilee Estate</td><td>01/08/2023</td><td>30/10/2023</td><td>25/01/2024</td><td>23/04/2024</td></tr></table>	Operating Unit	3 rd meeting (2023)	4 th meeting (2023)	1 st meeting (2024)	2 nd meering (2024)	Bukit Asahan Estate	04/08/2023	07/11/2023	08/02/204	07/05/2024	Diamond Jubilee POM	17/08/2023	06/11/2023	02/02/2024	02/05/2024	Welch Estate	12/09/2023	12/12/2023	08/03/2024	30/05/2024	Diamond Jubilee Estate	01/08/2023	30/10/2023	25/01/2024	23/04/2024	Complied
Operating Unit	3 rd meeting (2023)	4 th meeting (2023)	1 st meeting (2024)	2 nd meering (2024)																								
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Diamond Jubilee Estate	01/08/2023	30/10/2023	25/01/2024	23/04/2024																								
6.7.2	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	Accident and emergency protocols have been established, including the formation of an Emergency Response and Preparedness (ERP) Team for identified incidents. These procedures, encompassing fire,	Complied																									

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	<p>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>chemical spillage, flood, and workplace accidents, have been condensed into a flowchart and prominently displayed for all estate and mill employees. Detailed instructions can be found in the Emergency Preparedness & Response Procedures dated 17/11/2021 (reference number UM/HSE/SP/02) and the Standard Operating Procedure for Incidents, Accidents & Non-Compliance Management dated 01/05/2022 (reference number SDP/GSHSE/SP/01).</p> <p>The ERP team's organizational chart has been established and shared with employees, accompanied by essential telephone contact information. Guidelines were issued by the SPO (presumably Safety and Preparedness Officer) and adapted to suit variations in the situations within the estates and mill.</p> <p>Verified training related to ERP was conducted as table below:</p> <table><tr><th>Operating Unit</th><th>Date</th></tr><tr><td>Bukit Asahan Estate</td><td>27/03/2024</td></tr><tr><td>Diamond Jubilee POM</td><td>18/09/2023</td></tr><tr><td>Welch Estate</td><td>27/03/2024</td></tr><tr><td>Diamond Jubilee Estate</td><td>29/06/2024</td></tr></table> <p>It was noted that Emergency Response Team for each supply base was updated as per Jan 2024. The team was divided into 6 sub-team which are firefighting team, security team, chemical spillage team, accident team, haze team and flood control team.</p> <p>Monthly First Aid inspection record and updates was conducted by each Medical Assistant (MA) as table below:</p>	Operating Unit	Date	Bukit Asahan Estate	27/03/2024	Diamond Jubilee POM	18/09/2023	Welch Estate	27/03/2024	Diamond Jubilee Estate	29/06/2024	
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		<table><tr><td>Certification Unit</td><td>Date of Latest Monthly Inspection</td></tr><tr><td>Bukit Asahan Estate</td><td>15/06/2024</td></tr><tr><td>Diamond Jubilee POM</td><td>26/06/2024</td></tr><tr><td>Welch Estate</td><td>28/06/2024</td></tr><tr><td>Diamond Jubilee Estate</td><td>07/06/2024</td></tr></table> <p>The operating units consistently document accident-related information, including JKPP 6 forms submitted to the Department of Safety & Health, medical leave certificates, accident investigation reports, and reviews of Hazard Identification, Risk Assessment, and Risk Control (HIRARC). According to JKPP 8 submission report for year 2023, it was confirmed that all accidents were reported, and LTA was calculated accordingly.</p>	Certification Unit	Date of Latest Monthly Inspection	Bukit Asahan Estate	15/06/2024	Diamond Jubilee POM	26/06/2024	Welch Estate	28/06/2024	Diamond Jubilee Estate	07/06/2024	
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6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units supply Personal Protective Equipment (PPE) to workers in accordance with Safety Work Procedures and recommendations derived from risk assessment reports, including Chemical Hazard Risk Assessments (CHRA) and Noise Risk Assessments (NRA).</p> <p>All estate ensures that all workers receive appropriate Personal Protective Equipment (PPE) based on their job types.</p> <p>Bukit Asahan Estate</p> <p>During a site visit at P01A, it was observed that P&D Sprayers were equipped with safety helmets, aprons, mask, goggle, and wellington boots as per HIRARC documents.</p>	Complied										

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		<p>Welch Estate</p> <p>Site visit and interview session with harvesters at P05 confirmed that harvesters provided with PPE such as safety helmet, safety vest and wellington boot.</p> <p>Diamond Jubilee Estate</p> <p>Site visit and observation at P05H verified that tractor driver was equipped with PPE such as safety helmet, earplug, and safety boot</p> <p>The PPE issuance records for all certification units have been reviewed and verified. These records are updated for each worker accordingly. Interview session with workers at each operating units confirmed that the records are consistent with on-site observations.</p> <p>The estate conducts PPE inspections at least once every six months, as evidenced by the inspection records reviewed as table below:</p> <table><tr><th>Certification Unit</th><th>Activity Inspected</th><th>Date</th></tr><tr><td>Bukit Asahan Estate</td><td>P&D Spraying</td><td>01/03/2024</td></tr><tr><td>Welch Estate</td><td>Inter-row Spraying</td><td>18/06/2024</td></tr><tr><td>Diamond Jubilee Estate</td><td>Nursery</td><td>21/06/2024</td></tr></table>	Certification Unit	Activity Inspected	Date	Bukit Asahan Estate	P&D Spraying	01/03/2024	Welch Estate	Inter-row Spraying	18/06/2024	Diamond Jubilee Estate	Nursery	21/06/2024	
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Diamond Jubilee Estate	Nursery	21/06/2024													
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>Noted that all employees receive medical care known as SOCSO contribution, and a review of workers' profile records indicates that every worker is covered by accident insurance.</p>	Complied												

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		<table> <tr> <th>Certification Unit</th><th>Month</th><th>Total Workers</th><th>Amount</th></tr> <tr> <td>Bukit Asahan Estate</td><td>June 2024</td><td>232</td><td>RM7,238.60</td></tr> <tr> <td>Diamond Jubilee POM</td><td>June 2024</td><td>109</td><td>RM6,436.40</td></tr> <tr> <td>Welch Estate</td><td>June 2024</td><td>81</td><td>RM2,858.10</td></tr> <tr> <td>Diamond Jubilee Estate</td><td>June 204</td><td>267</td><td>RM8,937.10</td></tr> </table>	Certification Unit	Month	Total Workers	Amount	Bukit Asahan Estate	June 2024	232	RM7,238.60	Diamond Jubilee POM	June 2024	109	RM6,436.40	Welch Estate	June 2024	81	RM2,858.10	Diamond Jubilee Estate	June 204	267	RM8,937.10	
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6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of accidents were documented accordingly. It was verified that Records of Lost Time Accident (LTA) metrics were consistently maintained. Observed samples of accident statistics for Year 2023 as reported to DOSH are as follows:</p> <table> <tr> <th>Operating Unit</th><th>Accidents Reported</th><th>Lost Time Accident (LTA)</th><th>Reference No.</th></tr> <tr> <td>Bukit Asahan Estate</td><td>2</td><td>79 days</td><td>JKKP 8/152898/2023</td></tr> <tr> <td>Diamond Jubilee Estate</td><td>15</td><td>13 days</td><td>JKKP 8/154277/2023</td></tr> <tr> <td>Welch Estate</td><td>11</td><td>38 days</td><td>JKKP 8/152702/2024</td></tr> <tr> <td>Diamond Jubilee Estate</td><td>2</td><td>32 days</td><td>JKKP 8/128523/2023</td></tr> </table>	Operating Unit	Accidents Reported	Lost Time Accident (LTA)	Reference No.	Bukit Asahan Estate	2	79 days	JKKP 8/152898/2023	Diamond Jubilee Estate	15	13 days	JKKP 8/154277/2023	Welch Estate	11	38 days	JKKP 8/152702/2024	Diamond Jubilee Estate	2	32 days	JKKP 8/128523/2023	Complied
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Principle 7: Protect, conserve and enhance ecosystems and the environment			
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have developed Integrated Pest Management (IPM) plans to effectively control pests and reduce chemical usage. Here are the plans established for each estate:</p> <p>Bukit Asahan Estate:</p> <ul style="list-style-type: none"> To maintain progressive planting of Turnera Subulata, Cassia cobanensis, Antigonon leptopus at immature area To do census of barn owl, rat bait census and Ganoderma census. <p>Welch Estate:</p> <ul style="list-style-type: none"> To maintain progressive planting of Turnera Subulata, Casia Cobanensis and Antigonon leptopus at immature area. LCC planting Installation of barn owl boxes To maintain grass cutting programme at housing area. <p>Diamond Jubilee Estate</p> <ul style="list-style-type: none"> Ganoderma disease: To do annual census for all mature field annually Barn owl box: To keep maintenance of BOB and give awareness training to workers. 	Complied

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		The estates monitor the implementation of the management plan. During a site visit at sampled estate, it was observed that the beneficial plants were well established.	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	None of the plant species mentioned, which are referenced in the Global Invasive Species Database and CABI.org, are utilized in their IPM management. In SOU 18, three plant species were employed for IPM, including <i>Tunera subulata</i> , <i>Cassia cobanensis</i> , and <i>Antigonan leptopus</i> .	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There is no evidence or records indicating the use of fire for pest control at any of the estates visited. This practice is explicitly addressed in the SD Guthrie Berhad Group Sustainability and Quality Policy Statement, signed by the Group Managing Director on 02/12/2019, supported by SDP Responsible Agriculture Charter under section 3.2: Protect and enhance forest. The policy states: "We will seek to protect and enhance forest and wildlife, and minimise carbon emissions from land use change through: Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as protective firefighting measures in and around our operation."	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	Agrochemical usage adhered to the Standard Operating Procedure outlined in the Agricultural Reference Manual (ARM), SOP, and the Safety Pictorial Book provided by SD Guthrie Berhad. Please refer to the Sime Darby Agricultural Reference Manual, (ARM), 3 rd Edition, date issued 06/12/2023. The selection of products was tailored to address the specific target pest, weed, and disease.	Complied

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		Sighted and reviewed chemical register and confirmed that all operating units confined usage to only class II, class III & class IV pesticides																													
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides used (including active ingredients used and their Lethal Dosage (LD 50), area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate. Sighted Monitoring Record Pesticide Use Per Ha FY2023. Average data as per estates below:</p> <table border="1"> <thead> <tr> <th>a.i/ha (2024)</th><th>Bukit Asahan Estate</th><th>Welch Estate</th><th>Diamond Jubilee Estate</th></tr> </thead> <tbody> <tr> <td>Jan</td><td>0.136</td><td>0.669</td><td>0.134</td></tr> <tr> <td>Feb</td><td>0.127</td><td>0.167</td><td>0.112</td></tr> <tr> <td>Mar</td><td>0.139</td><td>0.624</td><td>0.078</td></tr> <tr> <td>Apr</td><td>0.125</td><td>0.731</td><td>0.046</td></tr> <tr> <td>May</td><td>0.175</td><td>0.909</td><td>0.075</td></tr> <tr> <td>June</td><td>0.050</td><td>0.366</td><td>0.065</td></tr> </tbody> </table>	a.i/ha (2024)	Bukit Asahan Estate	Welch Estate	Diamond Jubilee Estate	Jan	0.136	0.669	0.134	Feb	0.127	0.167	0.112	Mar	0.139	0.624	0.078	Apr	0.125	0.731	0.046	May	0.175	0.909	0.075	June	0.050	0.366	0.065	Complied
a.i/ha (2024)	Bukit Asahan Estate	Welch Estate	Diamond Jubilee Estate																												
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June	0.050	0.366	0.065																												
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	All pesticides used were those officially registered under the Pesticide Act 1974. The selection of products was tailored to address the specific target pest, weed, and disease.	Complied																												

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		<p>Sighted and reviewed chemical register and confirmed that all operating units confined usage to only class II, class III & class IV pesticides.</p> <p>IPM Plan for all three estates were reviewed. Examples of programmed conducted are increasing number of barn owl nest, addition of plot for beneficial plants and increasing amount of EFB to be applied in estates.</p>	
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>No prophylactic use of pesticides can be identified during site visit and confirmation with Chemical Register updated on 01/01/2024</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative What is the process to limit the negative impacts of the application Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Observation at chemical store and documents verification via Chemical Register affirmed that there no Class 1A and Class 1B chemical has been utilized in estate and mill operation activities. Chemical ingredients commonly used are glyphosate, metsulfuron methyl, triclopyr which categorized as Class 2 and Class 3 chemicals. Other examples of chemical used are as listed below:</p> <ul style="list-style-type: none"> Supremo 41 – Glyphosate Isoprpylamine Ancom Sodium Chlorate – Sodium Chlorate Racumin – Coumatertraly Monex – Diuron Tri ester – Triclopyr Butoxy Ethyl Canyon 20 – metsulfuron methyl 	Complied

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7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide operators have undergone training concerning the safe and health-conscious usage, as well as the proper application methods of chemicals. Additionally, they regularly participate in monthly health surveillance conducted by the Medical Assistant. List of training conducted for each estate as details below:</p> <ul style="list-style-type: none"> • Bukit Asahan Estate: Chemical Handling and Emergency Response Training, dated 26/06/2024 • Welch Estate: Chemical Handling, and Chemical Spillage Briefing, dated 26/06/2024 • Diamond Jubilee Estate: Refresher Briefing on Chemical Handling and Scheduled Waste Management, dated 20/06/2024 <p>Based on interview session and documents review, training related to pesticide handling listed above were attended by sprayers, chemical mixer, store clerk and upkeep mandores.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were discovered stored in the Chemical Store on the estate, adhering to the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) along with their corresponding regulations. The storage facilities were consistently secured to avoid unauthorized access, and proper hazard signage was observed and well maintained at both exterior and interior walls. Adequate ventilation facilities and safety data sheets were also provided.</p> <p>Interview session with personnel in charge confirmed that chemical storage is restricted area for pregnant and breast feeding mothers.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p>	<p>Unused chemical containers not utilized for premixing were subjected to triple rinsing and puncturing. These containers were</p>	Complied

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	- Minor compliance -	then classified as scheduled waste and appropriately disposed of through waste collection contractors, as outlined in Indicator 7.3.2	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Bukit Asahan Estate</p> <p>It was verified that AXXXXXXX GXXXXXXX Sdn Bhd was appointed as vendor for aerial spraying activity. Authorization and approval from Civil Aviation Authority Malaysia (CAAM) was available, UAWC No. C. UAWC/ADG/2023 with expiry date at 28/02/2027. This vendor is authorized to perform agricultural operations utilizing an Unmanned Aircraft at field 2022A, 2022B, 2022C, 2022D, 2023A, 2023B and 2023C. In addition, verified Remote Pilot Certificate of Competency by CAAM for two of their drone pilot, Ref. No. RP-970704106653 and RP-951016105493. Prior to application of aerial spraying, communication was conducted among internal workers during rollcall session. This was confirmed during interview session with P&D Sprayers at field 23A.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>It was confirmed that each estate has conducted their Medical Surveillance as per requirement as details below</p> <p>Bukit Asahan Estate</p> <p>Latest Medical Surveillance conducted 15/05/2024, Ref No. HQ/20/DOC/00/00519 with KXXXXX KXXXXXX OXX MXXXX Cawangan Gangsa involving 50 workers. Report of the medical surveillance was available for review and no further medical concerns was noted.</p> <p>Welch Estate</p> <p>Latest Medical Surveillance conducted 12/02/2024, Ref No. 019/OHD/2024 with registered Occupational Health Doctor (OHD), Reg. No. HQ/08/DOC/00/545. 10 workers were involved among sprayers, foggers, manurers and workshop personnel. Report of the</p>	Complied

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		<p>medical surveillance was available for review and no further medical concerns was noted.</p> <p>Diamond Jubilee Estate</p> <p>Latest Medical Surveillance conducted on 05/02/2024 and 07/02/2024, Ref No. 019/OHD/2024 with registered Occupational Health Doctor (OHD), Reg. No. HQ/17/DOC/00/0094. 13 workers were involved among sprayers, foggers, manurers, and workshop personnel. Report of the medical surveillance was available for review.</p>	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>On-site observation at P23A (Bukit Asahan Estate), P05 (Welch Estate), Nursery and P18B (Diamond Jubilee Estate) in addition to verification of the employee master list, no evidence was found indicating that individuals under the age of 18, pregnant or breastfeeding women, or those with medical restrictions were involved in work related to pesticides.</p>	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Addressed in the Waste Management Procedure for Estates & Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01, waste management is categorized as follows:</p> <ol style="list-style-type: none"> 1. Scheduled Waste 2. Hazardous Waste 3. Non-Hazardous Waste 4. Industrial Waste 5. Construction Waste 	Complied

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		6. Agricultural Waste 7. Office Waste 8. General Waste	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	<p>The procedure for managing scheduled waste has been established, as outlined in the Waste Management Procedure for Estates & Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01. Additional reference was made to the Guidelines for Packaging, Labelling, and Storage of Scheduled Wastes in Malaysia.</p> <p>Awareness training on scheduled waste management has been conducted on the following dates:</p> <p>Bukit Asahan Estate: 26/06/2024 Diamond Jubilee POM: 22/04/2024 Welch Estate: 21/06/2024 Diamond Jubilee Estate: 28/06/2024</p> <p>Interviews with the person in charge and workers revealed that they have a good awareness of scheduled waste management practices.</p> <p>Record of Inventory of Schedule Waste and Disposal Record as per details below:</p> <p>Bukit Asahan Estate Inventory</p> <ul style="list-style-type: none"> • File reference Number: 0403M0162135322024 • Date Reporting: 31/05/2024 	Complied

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		<ul style="list-style-type: none"> Waste Generated: SW305, SW409, SW410. <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 2024062620TGNFD0 Date Disposal: 26/06/2024 SW409 – Used PPE & Rags: 0.0045 MT by PXXXX FXXX (Melaka) Sdn Bhd. <p>Sample 2</p> <ul style="list-style-type: none"> Disposal consignment note: 2024062620RSHY3N Date Disposal: 26/06/2024 SW305 – Waste of Lubricant Oil: 0.1015 MT by PXXXX FXXX (Melaka) Sdn Bhd. <p>Diamond Jubilee POM</p> <p>Inventory</p> <ul style="list-style-type: none"> File reference Number: JAS.MHQ.600-3/1/1 Date Reporting: 01/07/2024 Waste Generated: SW305, SW306, SW322, SW409, SW410, SW418. <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 2024060510TBLA7Y Date Disposal: 05/06/2024 	
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		<ul style="list-style-type: none"> SW306 – Spent Hydraulic Oil: 0.0070 MT by PXXXX FXXX (Melaka) Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> Disposal consignment note: 20240605110HQ09Z Date Disposal: 05/06/2024 SW418 – Discarded or off spec solvent based paints: 0.0775 MT by PXXXX FXXX (Melaka) Sdn Bhd <p>Welch Estate</p> <p>Inventory</p> <ul style="list-style-type: none"> File reference Number: JAS.JMU.600-3/4/33 Date Reporting: 02/07/2024 Waste Generated: SW404, SW409, SW410 <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 2024060709PG8ACV Date Disposal: 07/06/2024 SW404 – Clinical Waste: 0.0081 MT by KXXXXX AXXX Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> Disposal consignment note: 20240604108KI4HX Date Disposal: 04/06/2024 SW305 – Spent Lubricating Oil – 0.0510 MT by CXX CXXXXXXXX (PG) Sdn Bhd 	
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		<p>Diamond Jubilee Estate</p> <p>Inventory</p> <ul style="list-style-type: none"> • File reference Number: 0403M0718697142024 • Date Reporting: 30/04/2024 • Waste Generated: SW305, SW410 <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 2024012613DFAVYJ • Date Disposal: 26/01/2024 • SW410 – Used Oil Filter: 0.0363 MT by PXXXX FXXX (Melaka) Sdn Bhd 	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>During visits to all estates, no evidence was found of fire being used for waste disposal.</p> <p>Bukit Asahan Estate and Welch Estate</p> <p>Domestic waste was disposed through municipal authorities. specifically, the MPJ (Majlis Perbandaran JXXXX) for Bukit Asahan Estate and Southern Waste Management (SWM) for Welch Estate, and disposed of at the municipal landfill.</p> <p>Diamond Jubilee Estate & Diamond Jubilee POM</p> <p>Domestic waste was disposed through municipal authorities. specifically, the MPJ (Majlis Perbandaran JXXXX), and disposed of at the municipal landfill.</p> <p>Bukit Selarong Estate</p>	Complied

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		Domestic waste was disposed through Landfill. Verified location of landfill at P2021A. Date open was 20/05/2024.	
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	<p>A Standard Operating Procedure (SOP) for managing soil fertility to optimize yield and minimize environmental impacts has been established. The preservation of soil fertility is guided by the organization's SOPs, which include the following sections from various documents:</p> <ul style="list-style-type: none"> ❖ EQMS chapter B8: Leguminous Cover Crops ❖ EQMS chapter B14: Manuring ❖ ARM Section 8: Manuring 	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	<p>Foliar and soil sampling were conducted by the Research and Development Department prior to fertilizer recommendations for the upcoming financial year. Leaf and soil nutrient analyses are standard practices for diagnosing fertilizer requirements in oil palms. Leaf sampling is typically conducted annually, while soil sampling is done at five-year intervals.</p> <p>Sampling records were reviewed as follows:</p> <p>Bukit Asahan Estate:</p> <ul style="list-style-type: none"> • The latest soil sampling was conducted on 29/03/2022, as indicated in report no. S33/2022 dated 11/05/2022. • The latest leaf sampling was conducted on 16/01/2024, as indicated in report no. P68/2024 dated 16/02/2024. <p>Welch Estate:</p>	Complied

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		<ul style="list-style-type: none">• The latest soil sampling was conducted on 16/08/2022, as indicated in report no. S60/2022 dated 02/11/2022.• The latest leaf sampling was conducted on 01/08/2023, as indicated in report no. P308/2023 dated 24/08/2023. <p>Diamond Jubilee Estate:</p> <ul style="list-style-type: none">• The latest soil sampling was conducted on 09/05/2022, as indicated in report no. S37/2022 dated 10/06/2022.• The latest leaf sampling was conducted on 17/04/2023, as indicated in report no. P160/2023 dated 10/05/2023.						
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The mill disposed EFB by send to neighbouring sister estate as nutrient recycle program. Reviewed the EFB disposal records FY 2024 as follows:</p> <p>The following practices are applied in the estates in relation to the nutrient recycling strategy;</p> <ol style="list-style-type: none">1. EFB application in designated fields at dosage of 40 mt/ha applied in inter rows subject to Agronomist recommendations.2. Cut frond are stacked in between the palm’s rows left to discompose. <p>The estate has established EFB and Bio-Compost application program FY 2024. Reviewed the application records as to date Apr 2024 as follows:</p> <table><tr><td>Estate</td><td>Mar 2024</td><td>Apr 2024</td><td>May 2024</td><td>June 2024</td></tr></table>	Estate	Mar 2024	Apr 2024	May 2024	June 2024	Complied
Estate	Mar 2024	Apr 2024	May 2024	June 2024				

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		<table><tr><td>Bukit Asahan Estate</td><td>294.10</td><td>768.28</td><td>980.60</td><td>996.30</td></tr><tr><td>Welch Estate</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>Diamond Jubilee Estate</td><td>542.79</td><td>645.71</td><td>560.58</td><td>674.50</td></tr></table>	Bukit Asahan Estate	294.10	768.28	980.60	996.30	Welch Estate	0.00	0.00	0.00	0.00	Diamond Jubilee Estate	542.79	645.71	560.58	674.50	
Bukit Asahan Estate	294.10	768.28	980.60	996.30														
Welch Estate	0.00	0.00	0.00	0.00														
Diamond Jubilee Estate	542.79	645.71	560.58	674.50														
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Fertilizer application was carried out based on recommendations provided by agronomists, which were derived from foliar sampling conducted. Records of fertilizer application were accessible for review at the visited estate. The estate reported the fertilizer application to the Research and Development Carey Island. For details, refer to the 2023 and 2024 Fertilizer Programme and Application Record.	Complied															
Criterion 7.5: Practices minimise and control erosion and degradation of soils.																		
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Soil maps were readily available at all estates, delineating the various soil series and their respective area percentages within the estate boundaries. Notably, there were no marginal or fragile soils identified across the assessed estates. There is no new oil palm plantings were initiated on steep terrain. This was verified through site visits, interviews, and document verification processes.	Complied															
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in	The commitment to protect and conserve biodiversity and ecosystems is articulated in the SD Guthrie Group Sustainability and Quality Policy Statement, signed by the Group Managing Director on 2/12/2019, as well as the Responsible Agriculture Charter. Under	Complied															

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	contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	section 3.1 of the Responsible Agriculture Charter, specifically 3.1.2, it is stated: "Management of erosion by protection of steep slopes and river reserves within our operations and promote restoration programs." This underscores the company's dedication to managing erosion risks by safeguarding steep slopes and river reserves within its operations, while also actively promoting restoration efforts in relevant areas.									
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting conducted at all estates visited as verified and sighted during site visit.	Complied								
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.											
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil series and topography maps were observed at the sampled estates, revealing no categorization of fragile soils within the sampled estates. During planning for replanting, the estate considered factors such as land terrain, drainage, and road systems. The table below illustrates the identified soil series for each estate: Bukit Asahan Estate (Home Division) <table><tr><td>Soil series</td><td>Percentage, %</td></tr><tr><td>C1, Burgor</td><td>0.99</td></tr><tr><td>C3, Alluvium</td><td>11.08</td></tr><tr><td>C4, Malacca</td><td>36.12</td></tr></table>	Soil series	Percentage, %	C1, Burgor	0.99	C3, Alluvium	11.08	C4, Malacca	36.12	Complied
Soil series	Percentage, %										
C1, Burgor	0.99										
C3, Alluvium	11.08										
C4, Malacca	36.12										

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		C1, Munchong	0.04	
		C4, Unclassified	0.04	
		Welch Estate		
		Soil series	Percentage, %	
		C1, Munchong	38.14	
		C1, Serdang	18.61	
		C2, Prang	14.63	
		C3, Local Alluvium	22.91	
		C4, Malacca	5.71	
		Diamond Jubilee Estate		
		Soil series	Percentage, %	
		C1, Jerangau	4.15	
		C1, Rengam	1.51	
		C4, Malacca	13.78	
		C4, Unclassified	0.19	

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		During verification through site visits, it was confirmed that the replanting did not involve planting on marginal or fragile soils.																																
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Soil series and topography maps were available for the sampled estates, and no fragile soil was categorized within these estates. In planning for replanting, the estate considered factors such as land terrain, drainage, and road systems.	Complied																															
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	<p>The Agronomy Advisory and Services Department carried out assessments and supplied the estates with topography maps. Below are the sampled topography details observed at the estates:</p> <table> <tr> <th rowspan="2">Degree</th><th colspan="3">Percentage, %</th></tr> <tr> <th>Bukit Asahan Estate</th><th>Welch Estate</th><th>Diamond Jubilee Estate</th></tr> <tr> <td>0°-2° Flat</td><td>8.09</td><td>22.79</td><td>33.44</td></tr> <tr> <td>2°-6° Undulating</td><td>18.33</td><td>11.66</td><td>60.65</td></tr> <tr> <td>6°-12° Rolling</td><td>20.18</td><td>39.05</td><td>5.75</td></tr> <tr> <td>12°-20° Gentle Slope</td><td>1.65</td><td>24.22</td><td>0.15</td></tr> <tr> <td>20°-25° Hilly</td><td>0.01</td><td>2.27</td><td>0.01</td></tr> <tr> <td>>25° Steep</td><td>0.00</td><td>0.01</td><td>0.00</td></tr> </table>	Degree	Percentage, %			Bukit Asahan Estate	Welch Estate	Diamond Jubilee Estate	0°-2° Flat	8.09	22.79	33.44	2°-6° Undulating	18.33	11.66	60.65	6°-12° Rolling	20.18	39.05	5.75	12°-20° Gentle Slope	1.65	24.22	0.15	20°-25° Hilly	0.01	2.27	0.01	>25° Steep	0.00	0.01	0.00	Complied
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>25° Steep	0.00	0.01	0.00																															

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Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	No peat soil was identified at any of the estates visited within the SOU 18 Diamond Jubilee Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.	Not Applicable
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	No peat soil was identified at any of the estates visited within the SOU 18 Diamond Jubilee Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.	Not Applicable
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	No peat soil was identified at any of the estates visited within the SOU 18 Diamond Jubilee Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.	Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	No peat soil was identified at any of the estates visited within the SOU 18 Diamond Jubilee Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.	Not Applicable
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting.</p>	No peat soil was identified at any of the estates visited within the SOU 18 Diamond Jubilee Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the	Not Applicable

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	<p>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>	absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.	
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No peat soil was identified at any of the estates visited within the SOU 18 Diamond Jubilee Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the '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>	No peat soil was identified at any of the estates visited within the SOU 18 Diamond Jubilee Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid	A water management plan has been established at SD Guthrie SOU 18 Diamond Jubilee POM Certification Unit, with the plan being	Complied

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<p>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>	reviewed annually. The latest plan covers FY2023 and FY2024, with the following objectives and action plan details:		
	Bukit Asahan Estate		
	Objective	Category	Action Plan
	Protection of watercourse and wetland	River stream	To monitor the water quality by sending water analysis by R&D
			To do investigation for off spec parameters in the water sampling result
	Water consumption & Contingency Plan during water shortage, Dry spell or severe water pollution	Water consumption	To purchase water from vendor / sister estates
			Consumption of natural water for operation use
			To renew licence for abstracting of water bodies (BKSA)
	Daily consumption	Recording of monthly water Consumption from SAMB	
	Diamond Jubilee POM		
Objective	Category	Action Plan	

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		Water contingency plan	Water Shortage / dry Spell	Monitoring of water usage		
				To supply SAMB for Mill Operation		
		To monitor the usage of treated water in monthly basis Monitoring	Daily consumption	Awareness to workers on water consumption with care		
			Water catchment	BKSA – Licence for water abstraction		
				Maintenance of pond		
				To maintain availability of safety signage		
		Protection of water course and wetland	Water catchment	Water analysis results by R&D		
		Welch Estate				
		Objective	Category	Action Plan		
		Protection of water course	Water catchment pond	No chemical handling activities		
				To display warning signage		

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		<table><tr><td rowspan="2">Monitoring of water usage</td><td>Daily consumption</td><td>To do monitoring the water quality</td></tr><tr><td>SAJ water</td><td>Recording of monthly consumption</td></tr></table> <p>This plan aims to ensure efficient water management and conservation across the estates, addressing both quality and quantity concerns while promoting sustainable practices.</p>	Monitoring of water usage	Daily consumption	To do monitoring the water quality	SAJ water	Recording of monthly consumption				
Monitoring of water usage	Daily consumption	To do monitoring the water quality									
	SAJ water	Recording of monthly consumption									
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. Riparian buffer zones have been identified and demarcated. Signage has been placed. No chemicals and fertilizer application observed been used in their maintenance. In some areas Guatemala grass were planted along the riverbanks. Management of riparian zone is guided by River Reserve Management (Management of River Reserve in Sime Darby Plantation Berhad; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table><tr><td>River width (meter)</td><td>Minimum width for river reserve (m) for peninsular Malaysia and Sarawak</td></tr><tr><td>1-5</td><td>5</td></tr><tr><td>5-10</td><td>10</td></tr><tr><td>10-20</td><td>20</td></tr></table>	River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak	1-5	5	5-10	10	10-20	20	Complied
River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak										
1-5	5										
5-10	10										
10-20	20										

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		20-40	40	
		>40	50	
<p>There is availability of Sungai Asahan at Bukit Asahan Estate. Buffer zone has been established and marked with white paint. No evidence of chemical applications along the buffer zone. The river were desilt on annual basis by the Department Irrigation and Drainage. The estate conducted river water sampling on annually basis.</p> <p><u>Bukit Asahan Estate</u></p> <p><u>Industrial effluent</u></p> <ul style="list-style-type: none">• Date of report: 07/06/2024• Report No: IE809/2024• Date Tested: 17/05/2024 <p>There is off spec result for BOD & COD. Estate has do the investigation dated 22/06/2024 and sent for resampling dated 24/06/2024. Result were in progress.</p> <p><u>Diamond Jubilee POM</u></p> <p><u>Microbiology</u></p> <ul style="list-style-type: none">• Date of report: 16/05/2024• Report No: ML502/2024• Date Tested: 17/04/2024 <p><u>Effluent Analysis</u></p>				

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		<ul style="list-style-type: none"> • Date of report: 01/07/2024 • Report No: IE968/2024 • Date Tested: 14/06/2024 <p><u>Welch Estate</u></p> <p><u>Industrial effluent</u></p> <ul style="list-style-type: none"> • Date of report: 07/05/2024 • Report No: IE614/2024 • Date Tested: 19/04/2024 <p><u>Pesticide Water Analysis</u></p> <ul style="list-style-type: none"> • Date of report: 01/04/2024 • Report No: PL245/2024 • Date Tested: 21/03/2024 	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No overflow was observed, and flow meter reading was recorded daily.</p> <p>Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is quarterly monitored as per OER. Effluent Analysis conducted by accredited laboratory, Sime Darby Plantation Berhad and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. Refer to the latest report for dated April 2024. Monthly analysis was done for final discharge point. Total of 8 parameters (pH, BOD3, COD, TS, SS, TN, AN and</p>	Complied

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		O&G) were tested. Latest analysis report for 1 st , 2 nd , 3 rd 4 th Quarter quarters of year 2023 & 2024.			
		Report Date	Quarter/Week	BOD (Limit=5000mg/L)	
		02/04/2024	1 st week/1 st month	2645.00	
			5 th week/2 nd Month	945.00	
			9 th week/3 rd Month	2450.00	
		08/01/2024	1 st week/1 st month	3030.00	
			5 th week/2 nd Month	1925.00	
			9 th week/3 rd Month	1640.00	
		09/10/2023	1 st week/1 st month	2650.00	
			5 th week/2 nd Month	1083.00	
			9 th week/3 rd Month	2670.00	
		05/07/2023	1 st week/1 st month	3280.00	
			5 th week/2 nd Month	1730.00	
			9 th week/3 rd Month	725.00	

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		<p>The discharge was through land application and there is no negative impacts recorded. Based on water sampling conducted showed there is no issue on contamination from the discharge.</p> <p>For EFB sighted Disposal Inventory Record submitted to DOE. Refer "Laporan Inventori Pelupusan Tandan Kosong Kelapa Sawit" for the month of June 2024.</p>									
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Diamond Jubilee POM. Average data as below:</p> <table border="1"> <thead> <tr> <th>Year</th><th>Water/L</th><th>FFB Processed, MT</th><th>Water/FFB</th></tr> </thead> <tbody> <tr> <td>2023</td><td>120,288.00</td><td>74,692.99</td><td>1.55</td></tr> </tbody> </table>	Year	Water/L	FFB Processed, MT	Water/FFB	2023	120,288.00	74,692.99	1.55	Complied
Year	Water/L	FFB Processed, MT	Water/FFB								
2023	120,288.00	74,692.99	1.55								
Criterion 7.9: 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.</p> <p>- 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 Management Plan 2024. The document was reviewed/updated on January 2024. Among the Energy Management Plan were:</p> <ul style="list-style-type: none"> i) Worker's housing inspection to ensure no illegal wiring ii) Preventive maintenance programme for estate vehicles iii) Training / Educate workers on fuel saving practices iv) Regular maintenance of transport @ machine as per recommendation 	Complied								

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		<p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <p>The mill and estate monitored the diesel usage per ton FFB process/production on monthly basis. Reviewed the data FY 2023 as follows:</p> <table> <tr> <th>Estate / Mill</th><th>Diesel, (MT)</th><th>FFB, (MT)</th><th>Diesel / FFB (MT)</th></tr> <tr> <td>Diamond Jubilee POM</td><td>8,125.00</td><td>74,692.99</td><td>0.10</td></tr> <tr> <td>Diamond Jubilee Estate</td><td>55,528.00</td><td>44,076.30</td><td>1.26</td></tr> <tr> <td>Bukit Asahan Estate</td><td>63,353.00</td><td>29,311.44</td><td>2.16</td></tr> <tr> <td>Welch Estate</td><td>7,692.34</td><td>23,954.00</td><td>3.01</td></tr> </table>	Estate / Mill	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)	Diamond Jubilee POM	8,125.00	74,692.99	0.10	Diamond Jubilee Estate	55,528.00	44,076.30	1.26	Bukit Asahan Estate	63,353.00	29,311.44	2.16	Welch Estate	7,692.34	23,954.00	3.01	
Estate / Mill	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)																				
Diamond Jubilee POM	8,125.00	74,692.99	0.10																				
Diamond Jubilee Estate	55,528.00	44,076.30	1.26																				
Bukit Asahan Estate	63,353.00	29,311.44	2.16																				
Welch Estate	7,692.34	23,954.00	3.01																				
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.																							
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none"> • FFB record book • Stock book 	Complied																				

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		<ul style="list-style-type: none">Monthly stock issueStock requisition note MillMill Month End Production ReportMonthly production reportFlowmeter & running hours record bookBio-gas generation daily monitoring log sheet <p>Effluent analysis report Based on the verification of records; all the sampled issuance was traceable</p>					
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Complied				
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. Among the plan for pollution preventive action Plan FY 2023/2024 were:</p> <p>Bukit Asahan Estate</p> <table><tr><th>Objective</th><th>Action Plan</th></tr><tr><td></td><td>To Plant LCC</td></tr></table>	Objective	Action Plan		To Plant LCC	Non-compliance
Objective	Action Plan						
	To Plant LCC						

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		To minimize pollution from estate activities	Planting vetiver grass along side drain, water channelling at path, palm debris at lips of the terrace, stop bund	
		Management of schedule waste	To ensure all schedule waste is stored and disposed as per legal requirement	
			To provide regular inspection for estate vehicle for operation purposes	
			To maintain oil trap as to prevent oil spillage and to provide proper spill kit	
		To ensure the activity do not pollute the environment	To ensure mixing activity at dedicated area	
			No spraying near the water catchment area	
			To erect signages at workers housing complex "Dilarang melakukan pembakaran terbuka".	
			Weekly housing inspection	

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		<p>Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p> <p>As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports (Isokinetic Stack & Air Emission Monitoring Report):</p> <p><u>Year 2023</u></p> <ul style="list-style-type: none">• Report no.: E/SE/2301/30984A• Report date: 02/02/2024• Result: Dust: 33.76 mg/m³ (B5) vs limit 150, CO: 3.60 mg/m³ vs limit 1000 @ 12% CO₂ <p>Latest stack sampling has been conducted at 30/05/2024 and report was in progress.</p> <p>For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring. Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored.</p> <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per "Jadual Pamatuhan" no. JAS.MHQ.600-3/1/1 for DOE Licence No: 006085.</p> <p>Environmental audit by 3rd party has been conducted annually by Nisafety Consultancy dated 19/06/2023. Latest audit has been conducted at 12/06/2024 and report was in progress.</p> <p>Latest DOE visit was sighted on 29/02/2024. Refer DOE Visiting Book.</p>	
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		<p>Pollution Prevention Management Plan was not effectively implemented.</p> <p>Bukit Asahan Estate</p> <p>During site visit at Parking Bay, it was found three spot of oil contamination resulting from spillage of old tractors. It was not in line with Management Plan stated that Tractor Parking Bay – To maintain oil trap as to prevent oil spillage and to provide proper spill kit.</p> <p>Other that that, it was found 6 units of oil filters left unattended in the old trailer parked there. Based on interview the filters own by contractor working in the estate. It was not in line with Management Plan stated that SW – To ensure all schedule waste is stored and disposed as per legal requirement.</p> <p>Diamond Jubilee POM</p> <p>There is no oil tray provided at Heavy Mechanical Park Area (1 unit JCB and 2 unit tractors) resulting of spillage oil direct to the soil. It was not in line with Pollution and prevention plan stated To maintain Oil Trap and to provide proper spill kit.</p> <p>Welch Estate</p> <p>During site visit at Water Catchment Area, Water Pump House, it was observed some of empty lubricant container and 20L chemical container was left unattended. Based on interview the SW stored there was not identified more than 180 days. It was not in line with Pollution Prevention Management Plan under section Management of schedule waste stated To ensure all schedule waste is stored and disposed as per legal requirement.</p> <p>Diamond Jubilee Estate</p>	
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		<p>During site visit at Workshop Area it was observed old tractors parked there without oil tray resulting of soil contamination. It was in line with pollution Prevention management Plan under section Management of land and water pollution stated Spill tray for farm vehicle.</p> <p>Thus, Major Nc was raised.</p>	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>Visit to the replanting areas in sampled estates confirmed that the land for replanting is not prepared by burning. Interview with the workers and management indicated that they do not prepare land for replating by burning. Verification through document review, interview and site visit confirmed that there is no replanting prepared by burning. Refer Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law – EQA and Regulations 1974. No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.</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.</p> <p>- Minor compliance -</p>	<p>Fire prevention measure has been established. Refer Emergency Preparedness and Response Procedures. Refer document no. UM/HSE/SP/02. Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire is detected, inform estate. Sime Darby was engaged the Smart Hotspot Alert that monitored by satellite VIIRS for fire prevention. Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data. The system monitors any possible occurrence of fire within or nearby the concession areas throughout SD Guthrie</p>	Complied

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		Berhad operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.							
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>There is evidence that management has engaged with stakeholders regarding on fire prevention and control measures. Refer sample of matters stated details on Fire Prevention in the Stakeholder meeting:</p> <p>Bukit Asahan Estate: 06/03/2024</p> <p>Welch Estate: 13/06/2024</p> <p>Diamond Jubilee Estate: 21/06/2024</p> <p>Welch Estate and Diamond Jubilee Estate</p> <p>Sighted evidence of communication on fire prevention for adjacent stakeholders has been on 13/06/2024 and 21/06/2024 at Welch Estate and Diamond Jubilee Estate respectively however, as per sample verification the engagement and communication details record could be further improved. Thus, OFI was raised</p>	OFI						
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.									
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p>	<p>There is no land clearing conducted. The immature areas are of replanted area.</p> <p>New Planting Conversion From Rubber to Oil Palm</p> <table><tr><td>Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr></table>	Estate	2024	2025	2026	2027	2028	Complied
Estate	2024	2025	2026	2027	2028				

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	- Critical (Major) compliance -	<table><tr><td>Welch</td><td>248.98</td><td>290.97</td><td>0.00</td><td>0.00</td><td>0.00</td></tr></table> <p>Internal Social & Environment Impact Assessment (SEIA) Report has been conducted for SOU 18 Welch Estate (Conversion of Ex Rubber Plantation to Oil Palm Plantation) by Group Sustainability Department, SD Guthrie Berhad. Report was available dated 23/06/2023. Based on interview with management and site visit confirmed that the felling operation has been started and in progress for lining.</p> <p>In section 4.0 conclusion stated "In conclusion, the project site is suitable for development of oil palm as there are no adverse Social and Environmental impacts resulting from the proposed development with</p> <p>effective management plans and controls. Estate management shall ensure all relevant national and local regulations/ requirements are met before land clearing activity take place and throughout the project development and planting phase.</p> <p>It is recommended that the findings of this SEIA (in Section 3) and the operations of new plantings to be further incorporated with the existing environmental and social management and monitoring plans, including of High Conservation Value (HCV) and Social Impact Assessment (SIA). The effectiveness of these plans shall be evaluated, monitored/improved through regular management review meeting".</p> <p>Based on the verification, all action plan has been monitored and implemented.</p>	Welch	248.98	290.97	0.00	0.00	0.00	
Welch	248.98	290.97	0.00	0.00	0.00				
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows:	The HCV reassessment for SOU 18 Diamond Jubilee was conducted in July 2016, with the final report dated 2017 available for	Complied						

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	<p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE:</p> <p>Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>verification. A summary of the identified HCV areas is provided below.</p> <table><tr><th>Estate</th><th>Assessment Area</th><th>Ha</th><th>Present HCV</th></tr><tr><td>Diamond Jubilee Estate</td><td>Water Catchment</td><td>5.58</td><td>HCV 4</td></tr><tr><td rowspan="2">Bukit Asahan Estate</td><td>Water Catchment (Ayer Tekah Division)</td><td>0.69</td><td>HCV 4</td></tr><tr><td>Water Catchment (Main Division)</td><td>0.67</td><td>HCV 4</td></tr></table> <p>Regarding Welch Estate, it was previously included under SOU 19 Pagoh. Therefore, the HCV assessment is documented in the HCV Re-Assessment for SOU 19 Pagoh Report dated August 2016. The identified HCV areas are listed below.</p> <table><tr><th>Estate</th><th>Assessment Area</th><th>Ha</th><th>Present HCV</th></tr><tr><td>Welch Estate</td><td>Water Catchment</td><td>0.95</td><td>HCV 4</td></tr></table> <p>It was verified that there were no new land clearing in all the estates after 15/11/2018.</p>	Estate	Assessment Area	Ha	Present HCV	Diamond Jubilee Estate	Water Catchment	5.58	HCV 4	Bukit Asahan Estate	Water Catchment (Ayer Tekah Division)	0.69	HCV 4	Water Catchment (Main Division)	0.67	HCV 4	Estate	Assessment Area	Ha	Present HCV	Welch Estate	Water Catchment	0.95	HCV 4	
Estate	Assessment Area	Ha	Present HCV																							
Diamond Jubilee Estate	Water Catchment	5.58	HCV 4																							
Bukit Asahan Estate	Water Catchment (Ayer Tekah Division)	0.69	HCV 4																							
	Water Catchment (Main Division)	0.67	HCV 4																							
Estate	Assessment Area	Ha	Present HCV																							
Welch Estate	Water Catchment	0.95	HCV 4																							
7.12.3	Indicator is not applicable in Malaysia context	NA	Not Applicable																							
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring	<p>HCV management Plan has been done FY2024. Among the plan tabulated in the table below:</p> <table><tr><th>Objective</th><th>Action Plan</th></tr><tr><td></td><td></td></tr></table>	Objective	Action Plan			Complied																			
Objective	Action Plan																									

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requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -	Protection of erosion prone area	Roadside pit	
		Road patching by crusher run	
		Natural vegetation	
	Management of human wildlife conflict	To train / brief workers on ERT species	
		Recording of wildlife sighted in HCV monitoring report	
	Enhancement of HCV areas / biodiversity in the estates	To erect signage of HCV	
		To erect warning signage	
		To observe no sign of soil erosion	
		No encroachment near water stream	
	Training on HCV has been conducted as below: Bukit Asahan Estate: 25/06/2024 Diamond Jubilee Estate: 03/05/2024 Welch Estate: 26/06/2024 Sighted evidence of training material, attendance and photos. Based on interview with management and workers, they have good understanding on HCV matters.		

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7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>Not applicable since there is no land clearing after November 2005.</p> <p>New Planting Conversion From Rubber to Oil Palm</p> <table><tr><td>Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Welch</td><td>248.98</td><td>290.97</td><td>0.00</td><td>0.00</td><td>0.00</td></tr></table> <p>Internal Social & Environment Impact Assessment (SEIA) Report has been conducted for SOU 18 Welch Estate (Conversion of Ex Rubber Plantation to Oil Palm Plantation) by Group Sustainability Department, SD Guthrie Berhad. Report was available dated 23/06/2023. Based on interview with management and site visit confirmed that the felling operation has been started and in progress for lining.</p> <p>In section 4.0 conclusion stated "In conclusion, the project site is suitable for development of oil palm as there are no adverse Social and Environmental impacts resulting from the proposed development with</p> <p>effective management plans and controls. Estate management shall ensure all relevant national and local regulations/ requirements are met before land clearing activity take place and throughout the project development and planting phase.</p> <p>It is recommended that the findings of this SEIA (in Section 3) and the operations of new plantings to be further incorporated with the existing environmental and social management and monitoring plans, including of High Conservation Value (HCV) and Social Impact Assessment (SIA). The effectiveness of these plans shall be evaluated, monitored/improved through regular management review meeting".</p>	Estate	2024	2025	2026	2027	2028	Welch	248.98	290.97	0.00	0.00	0.00	Complied
Estate	2024	2025	2026	2027	2028										
Welch	248.98	290.97	0.00	0.00	0.00										

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		<p>Based on the verification, all action plan has been monitored and implemented.</p> <p>Among the conclusion statement based on environment section were:</p> <ul style="list-style-type: none"> • The proposed new planting is not in any way affecting/ disturbing the existing source of water to the plantation worker • No river observed around and within the area to be converted to oil palm • None of the assessed projects are located around on slope 25 degrees or more. • No removal of excess land activities into water course • The project site does not fall on the boundary of sensitive areas as the HCV areas is not located within a horizontal distance of 50 meters from the new planting site • There is no new building structures established during new planting • There is no nearby stakeholder at the new project site. 	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Based on the biodiversity report, there was no RTE species found in all the estates. Nonetheless, the monitoring plan of wildlife was established and implemented. Education about the status of RTE has been given to workforce through a muster briefing from time to time. Signage to restrict hunting and intrusion have been put up at many places at the estates especially at the points of entry to create awareness among the workers and surrounding communities.</p>	Complied

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7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Educational activities on RTE species were done through a few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of hunting or endangering the RTE species. Sighted the management also conducted the RTE monitoring, sample in Bukit Asahan Estate, Diamond Jubilee Estate and Welch Estate. Refer HCV monitoring latest record for the month of May and June 2024.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>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 18 estates. There is no land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018. Hence, the requirement under this indicator does not apply.</p>	Complied

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for SD GUTHRIE BERHAD SOU18 Diamond Jubilee 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 in **2023** for SD GUTHRIE BERHAD SOU 18 Diamond Jubilee and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.08
PK	1.08

Extraction	%
OER	20.86
KER	5.08

Production	t/yr
FFB Process	74,967.68
CPO Produced	15,639.04
PK Produced	3,808.91

Land Use	Ha
OP Planted Area	9,053.09
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	26.23
Total	9,053.09

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	42,845.90	0.57	46,448.20	188.41	0.00	0.00	89,294.11	0.57
CO ₂ Emission from fertilizer	5,947.99	0.08	4,880.69	19.80	0.00	0.00	10,828.68	0.08
NO ₂ Emission	2,935.89	0.04	2,412.33	9.79	0.00	0.00	5,348.22	0.04
Fuel Consumption	28.42	0.00	75.14	0.30	0.00	0.00	103.56	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-40,611.22	-0.54	-44,025.00	-178.58	0.00	0.00	-84,636.22	-0.54
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	11,146.98	0.15	9,761.36	39.72	0.00	0.00	20,938.35	0.15

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0.00	0.00
Fuel Consumption	1.41	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	1.41	0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

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

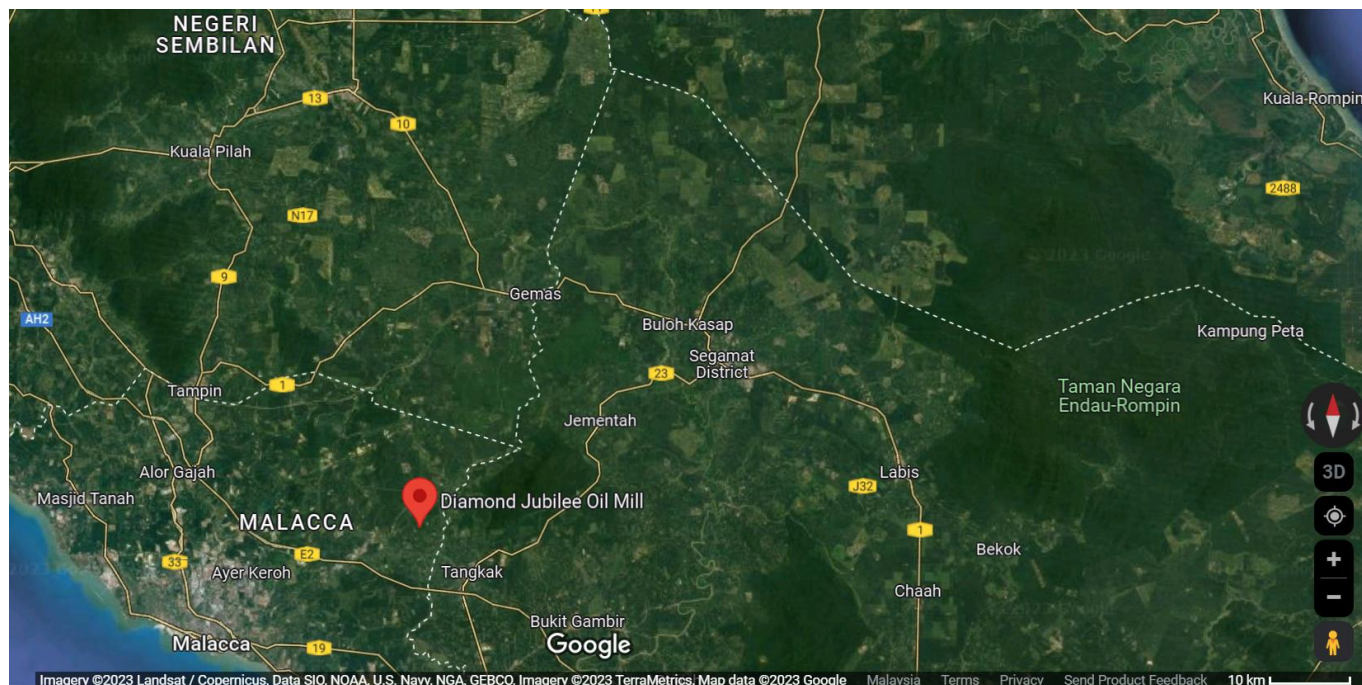
*This mill has no kernel crusher operation.

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

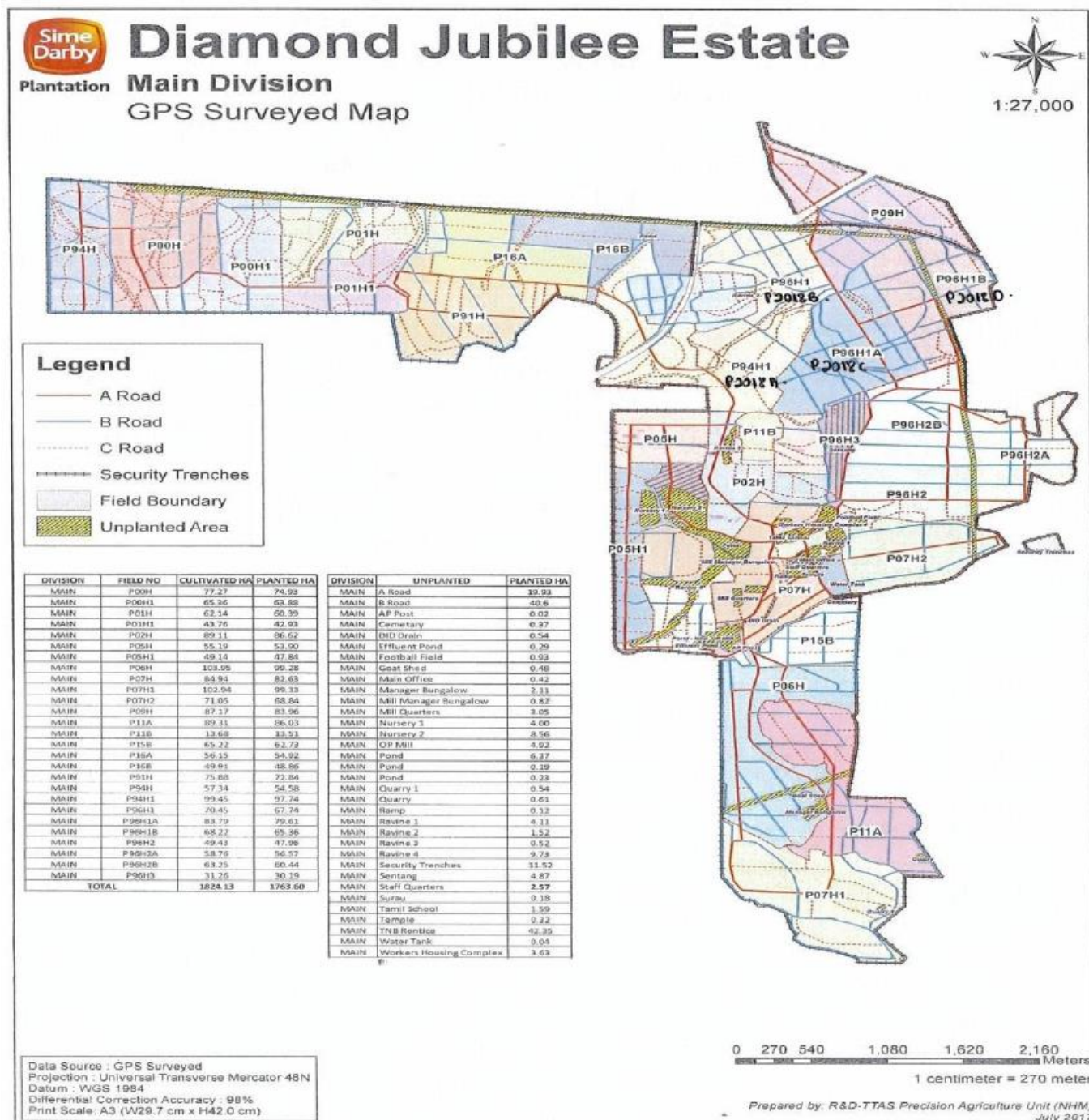
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

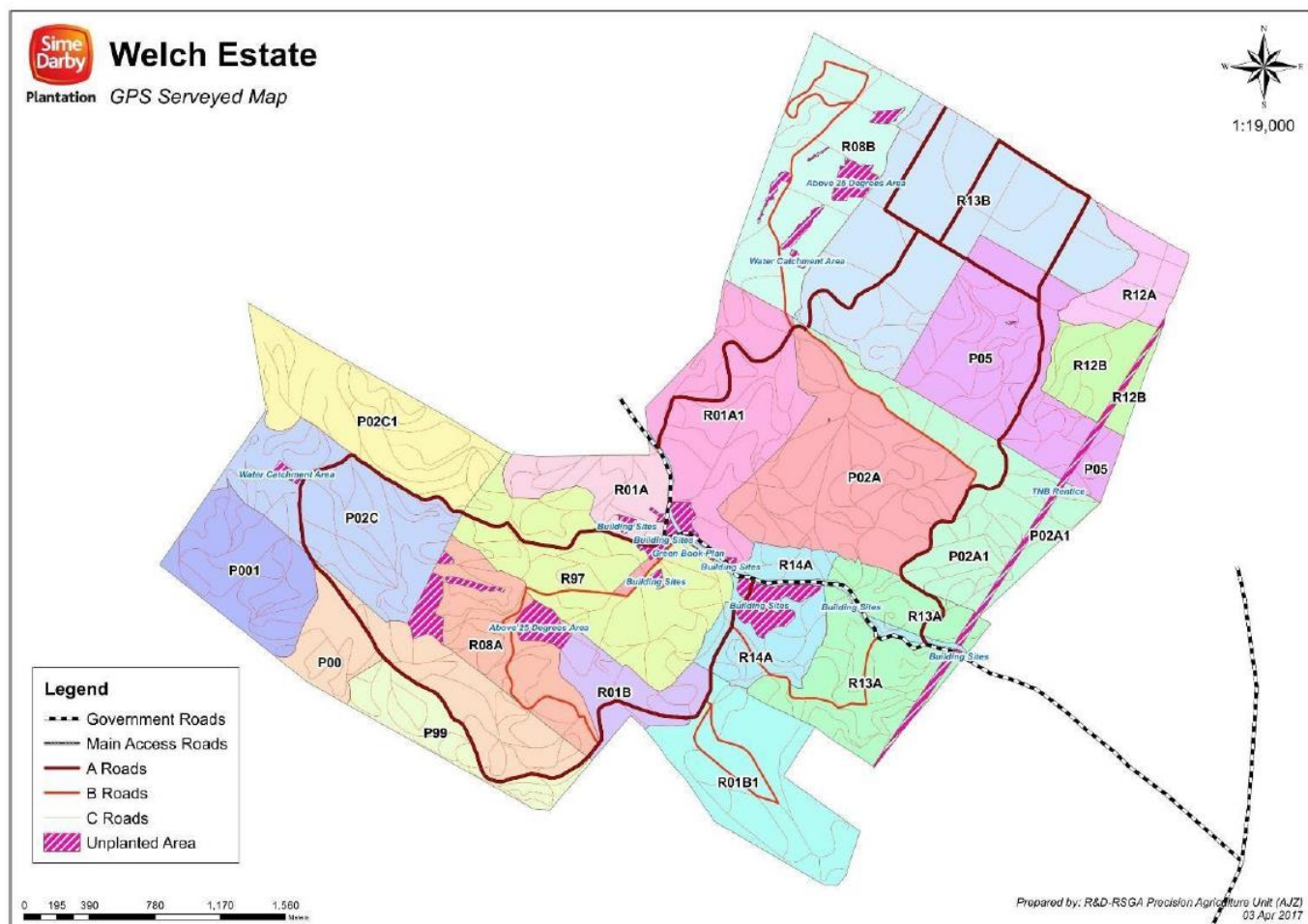
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Appendix C: Location Map of Certification Unit and Supply bases



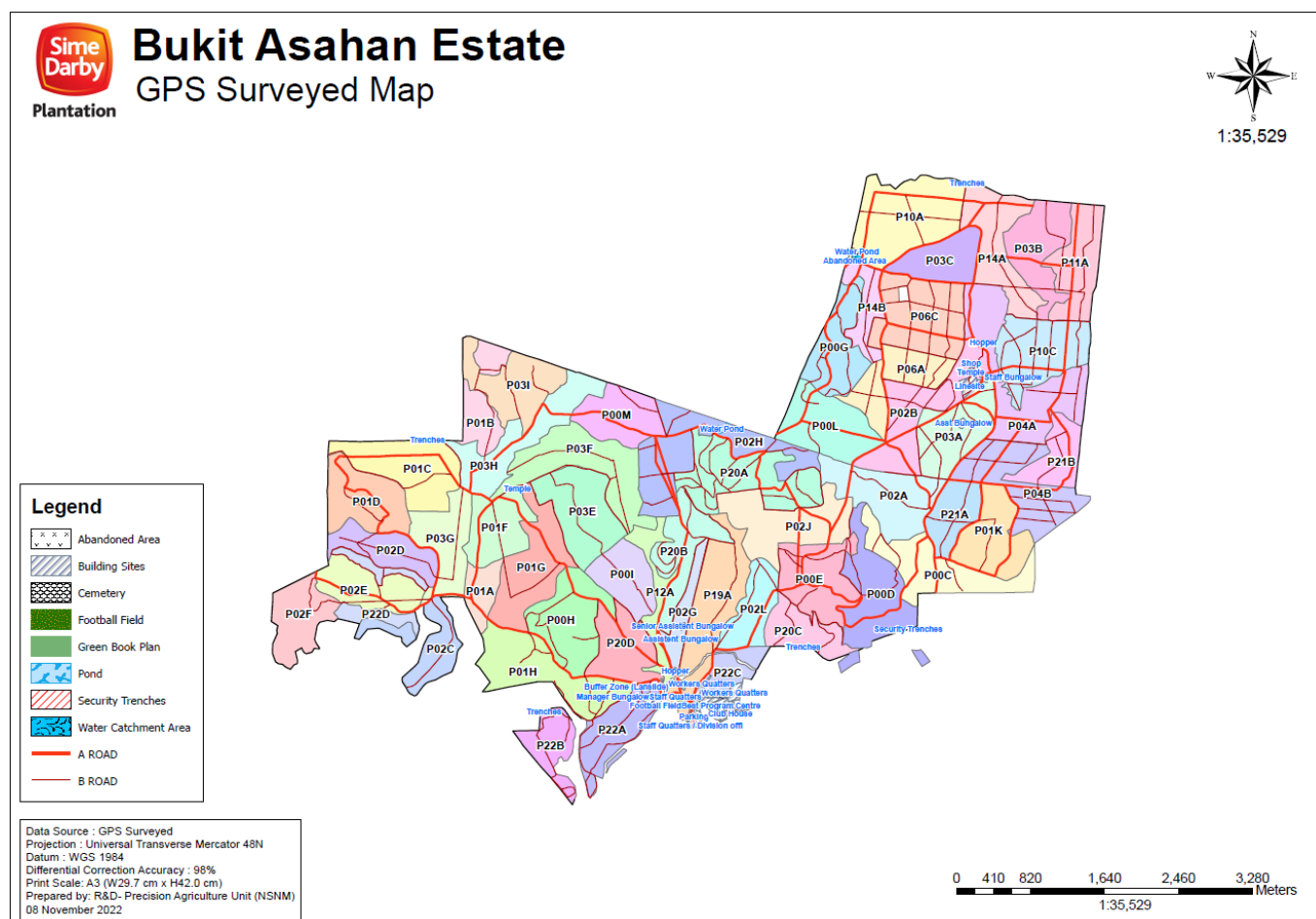
Appendix D: Estate Field Map





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Appendix E: List of Smallholder Registered and/or sampled

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

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

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Appendix F: List of Abbreviations

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