

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

- ☐ Initial Assessment
- ☒ Annual Surveillance Assessment (2_4)
- ☐ 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, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 20) – Chaah Palm Oil Mill
Location of Certification Unit: KM 16, Jalan Labis, 85400 Chaah, Johor, Malaysia
Date of Final Report: 09/11/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SD Guthrie Berhad (Previously Known As Sime Darby Plantation Berhad)		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 11, Main Block, Plantation Tower 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 20) – Chaah Palm Oil Mill		
Location / Address	KM 16, Jalan Labis, 85400 Chaah, Johor, Malaysia		
Website	www.sdguthrie.com		
Management Representative	Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD)	E-mail	shylaja.vasudevan@sdguthrie.com
Telephone	+603 78484000 (Head Office)	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 548299	Certificate Start Date	18/11/2020
Date of First Certification	18/11/2010	Certificate Expiry Date	17/11/2025
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_4) <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	30 MT/HR
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682047	MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn. Bhd	27/12/2027
MSPO 685287	MS 2530-4:2013 – General Principles for Palm Oil Mills		27/12/2027
MSPO 714134	MSPO Supply Chain Certification Standard 2018		03/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Chaah POM	Kilang Kelapa Sawit Chaah, KM 16, Jalan Labis, 85400 Chaah, Johor, Malaysia	2° 8' 56.63" N	102° 58' 25.24" E
Chaah Estate	Ladang Chaah 85400 Chaah, Johor, Malaysia	2° 10' 31.00" N	102° 59' 53.00" E
North Labis Estate	Ladang North Labis, 85300 Labis, Johor, Malaysia	2° 23' 00.00" N	103° 03' 00.00" E
Sg. Simpang Kiri Estate	Ladang Sg Simpang Kiri, 85400 Chaah, Johor, Malaysia	2° 08' 54.00" N	103° 03' 00.00" 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
Chaah Estate	2,730.83	6.95	58.05	2,795.83	97.68
North Labis Estate	3,225.23	1.63	306.05	3,532.91	91.29
Sg. Simpang Kiri Estate	2,095.25	62.11	214.30	2,371.66	88.35
Total	8,051.31	70.69	578.40	8,700.40	92.54
Note: North Labis Estate: 1. Based on the HCV Report version 2 August 2016, For Conservation/HCV (ha) is 1.63 ha. Chaah Estate 1. Based on the HCV Report version 2 August 2016, For Conservation/HCV (ha) is 6.95 ha. 2. Reassessment of area for infrastructure & other revised to 58.05 ha Simpang Kiri Estate 1. Based on the HCV Report version 2 August 2016, For Conservation/HCV (ha) is 62.11 ha.					

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2. Reassessment of area for infrastructure & other revised to 214.30ha

6. Plantings & Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Chaah Estate	367.73	260.03	770.48	1,332.59	2,363.10	367.73
North Labis Estate	427.24	1,241.43	822.32	734.24	2,797.99	427.24
Sg. Simpang Kiri Estate	390.94	354.48	1,349.83	-	1,704.31	390.94
Total (ha)	1,185.91	1,855.94	2,942.63	2,066.83	6,865.40	1,185.91

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 (Nov 23 – Oct 24)	Actual (Aug 23 – July 24)		Forecast (Nov 24 – Oct 25)
		Previous license period (Aug 23 – Oct 23)	Current license period (Nov 23 – July 24)	
Chaah Estate	46,883.24	9,995.91	32,470.22	30,013.98
North Labis Estate	49,227.30	5,654.65	15,294.96	17,536.39
Sg. Simpang Kiri Estate	22,295.00	5,368.65	16,976.35	34,725.00
Total	118,405.54	85,760.74		82,275.37

Note: Variance of 31,644.8 MT @ 27.57% compared to forecast/budget due to low yield recorded due palm damages to major flood.

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Nov 23 – Oct 24)	Actual (Aug 23 – July 24)		Forecast (Nov 24 – Oct 25)
		Previous license period (Aug 23 – Oct 23)	Current license period (Nov 23 – July 24)	
Yong Peng Estate		9,327.54	25,885.81	
Total		35,213.35		

Note: Diversion crop recorded from Yong Peng Estate, certificate no. RSPO certificate no.: CU-RSPO-863078

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Nov 23 – Oct 24)	Actual (Aug 23 – July 24)		Forecast (Nov 24 – Oct 25)
		Previous license period (Aug 23 – Oct 23)	Current license period (Nov 23 – July 24)	
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	Aug 2023	9,580.45	-	9,580.45
2	Sept 2023	10,868.67	-	10,868.67
3	Oct 2023	9,897.63	-	9,897.63
4	Nov 2023	11,370.57	-	11,370.57
5	Dec 2023	11,026.95	-	11,026.95
6	Jan 2024	10,533.27	-	10,533.27
7	Feb 2024	9,419.03	-	9,419.03
8	Mar 2024	9,708.80	-	9,708.80
9	Apr 2024	7,890.80	-	7,890.80
10	May 2024	10,755.510	-	10,755.51
11	June 2024	9,736.880	-	9,736.88
12	July 2024	10,185.530	-	10,185.53
TOTAL		120,974.09	-	120,974.09

10. Summary of Certified Tonnage (MT) (not applicable for ISS)								
Estimated last year (Nov 23 – Oct 24)		Actual (Aug 23 – July 24)				Forecast (Nov 24 – Oct 25)		
		Previous license period (Jul 2023 – Sept 2023)		Current license period (Oct 2023 – June 2024)				
FFB		FFB				FFB		
IP	118,404.54 mt	IP	30,346.75 mt	IP	90,627.34 mt	IP	82,274.37 mt	
		MB	0.00 mt	MB	0.00 mt			
MB	1.00 mt	TOTAL		IP		120,974.09 mt	MB	1.00 mt

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			MB		0.00 mt			
CPO (OER: 20.70%)		CPO (OER: 20.77 %)				CPO (OER: 21.00 %)		
IP	24,177.41 mt	IP	5,874.85 mt	IP	18,091.93 mt	IP	16,865.45 mt	
		MB	0.00 mt	MB	0.00 mt			
MB	1.00 mt	TOTAL		IP		23,966.77 mt	MB	1.00 mt
				MB		0.00 mt		
PK (KER: 5.18 %)		PK (KER:4.51%)				PK (KER: 5.05%)		
IP	6,298.17 mt	IP	1,512.03 mt	IP	4,512.24 mt	IP	4,359.59 mt	
		MB	0.00 mt	MB	0.00 mt			
MB	1.00 mt	TOTAL		IP		6,024.27 mt	MB	1.00 mt
				MB		0.00 mt		

Note(s):

* Volume extension approved on 06/09/2024

CSPO: 24,177.41 mt (IP) + 6,564.09 mt (IP vol. ext) + 1mt (MB) + 1 mt (MB vol. ext)= 30,743.50 mt

CSPK: 6,298.17 mt (IP) + 1,466.41 mt (IP vol. ext.) + 1 mt (MB) +1 mt (MB vol. ext) = 7,766.58 mt

FFB: 118,404.54 mt (IP) + 26,608.50 mt (IP vol. ext.) + 1 mt (MB) + 1 mt (MB vol.ext.)= 145,015.04 mt

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

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Aug 2023	1,797.12	476.92
2	Sept 2023	2,175.29	539.94
3	Oct 2023	1,902.44	495.17
4	Nov 2023	2,258.60	652.78
5	Dec 2023	2,242.26	555.57
6	Jan 2024	2,089.87	542.49
7	Feb 2024	1,875.79	461.77
8	Mar 2024	1,898.82	527.17
9	Apr 2024	1,609.45	415.21
10	May 2024	2,112.34	521.31
11	June 2024	1,941.44	379.24
12	July 2024	2,063.36	456.70
TOTAL		23,966.78	6,024.27

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11. Summary of Actual Volume sold					
Current License period (Nov 2023 – July 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	11,804.24	0	0	706.45	12,510.69
PK (MT)	3,210.49	0	0	69.58	3,280.07
Credits	-	-	-	-	-
Previous License period (Aug – Oct 2023)					
CPO (MT)	2,877.99	0	0	0	2,877.99
PK (MT)	963.47	0	0	593.93	1,557.40
Credits	-	-	-	-	-
Note: Conventional is RSPO certified material but sold as non-RSPO. *Carry forwards stock from July 2023: CPO – 350.61 mt, PK – 350.61 mt					

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	P/HCI/2406/PK0023	TR-43fa6ab0-1ae7	0	96.19
2	P/HCI/2406/PK0023	TR-521ee8ba-362b	0	238.45
3	P/HCI/2406/PK0023	TR-9844f947-68bf	0	4.68
4	P/HCI/2405/PK0016	TR-0fcc8add-9bb9	0	400.00
5	P/HCI/2404/PK0022	TR-403d1c0d-ae7a	0	122.20
6	P/HCI/2404/PK0022	TR-149b49b2-0eb7	0	127.80
7	P/HCI/2403/PK0025	TR-f8adc64f-325a	0	292.88
8	P/HCI/2402/PK0026	TR-ce7736a7-74de	0	232.31
9	P/HCI/2403/PK0025	TR-c79be3c7-c590	0	307.12
10	P/HCI/2402/PK0026	TR-89a92ca2-f7ca	0	367.69
11	P/HCI/2401/PK0025	TR-819c1f4c-a0a4	0	83.85
12	P/HCI/2401/PK0025	TR-d1619437-2db2	0	366.15
13	P/HCI/2312/PK0053	TR-88abaf69-2029	0	69.21
14	P/HCI/2312/PK0053	TR-f2d9d596-aa85	0	30.79
15	P/HCI/2312/PK0046	TR-34d9b6da-5f7c	0	500.00
16	P/HCI/2311/PK0030	TR-dd1d449b-282e	0	21.38
17	P/HCI/2311/PK0030	TR-c4cf2068-8ffb	0	115.15

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18	P/HCI/2311/PK0030	TR-68aa6c15-a550	0	63.47
19	P/HCI/2310/PK0065	TR-32a06c03-8f9c	0	200.00
20	P/HCI/2310/PK0062	TR-9b9f2b59-fcc8	0	100.00
21	P/HCI/2310/PK0013	TR-4691afa2-5d2a	0	100.00
22	P/HCI/2309/PK0068	TR-3e7722d1-77bc	0	34.35
23	P/HCI/2309/PK0068	TR-404300b2-77b2	0	115.65
24	P/HCI/2309/PK0011	TR-2780525c-705c	0	184.64
25	S/PSD/2308/CPO0013AA	TR-2fa1548d-6c69	120.18	0
26	S/PSD/2307/CPO0090E	TR-ed57f800-a6bf	6.40	0
27	S/PSD/2307/CPO0090G	TR-49092764-0342	31.10	0
28	S/PSD/2308/CPO0013DP	TR-220f3bc1-b032	42.21	0
29	S/PSD/2308/CPO0001A	TR-59710907-dd2a	40.83	0
30	S/PSD/2308/CPO0013DP	TR-547cab99-03e7	39.11	0
31	S/PSD/2308/CPO0001A	TR-7b1c85ab-08b9	100.32	0
32	S/PSD/2308/CPO0013DP	TR-fcec7ce2-aa3e	18.68	0
33	S/PSD/2308/CPO0009AG	TR-a9e7da4e-3501	80.81	0
34	S/PSD/2308/CPO0009AG	TR-e5737bec-137b	40.33	0
35	S/PSD/2308/CPO0009AG	TR-7c9587de-e344	40.26	0
36	S/PSD/2308/CPO0013DJ	TR-a6d24829-7466	40.20	0
37	S/PSD/2308/CPO0009AG	TR-3ad52085-630c	38.60	0
38	S/PSD/2308/CPO0009AL	TR-518cdc47-4b05	0.37	0
39	S/PSD/2308/CPO0013DJ	TR-f15b63a8-32ef	79.74	0
40	S/PSD/2308/CPO0009AL	TR-8cb6fd4a-f658	117.35	0
41	S/PSD/2308/CPO0009AL	TR-954eb520-830b	1.88	0
42	S/PSD/2308/CPO0013DJ	TR-66ef14b1-d1da	5.06	0
43	S/PSD/2308/CPO0016H	TR-82a7694f-bf35	112.19	0
44	S/PSD/2308/CPO0016H	TR-a8dbe29e-1974	39.89	0
45	S/PSD/2309/CPO0012F	TR-cdbd4960-c9aa	250.00	0
46	S/PSD/2309/CPO0015L	TR-c3660b7a-873a	200.00	0
47	S/PSD/2309/CPO0015G	TR-890c8986-12f9	13.53	0
48	S/PSD/2309/CPO0015M	TR-905a7be4-1e11	17.12	0
49	S/PSD/2309/CPO0015P	TR-4592a404-c862	2.44	0
50	S/PSD/2309/CPO0015R	TR-d3a0ef71-6969	135.73	0
51	S/PSD/2309/CPO0015W	TR-447a6843-1519	200.00	0

52	S/PSD/2309/CPO0046C	TR-7da0c14f-508b	1.60	0
53	S/PSD/2309/CPO0046E	TR-ecb518ce-38d8	1.26	0
54	S/PSD/2309/CPO0014BCD	TR-be3b36c4-0fd5	118.72	0
55	S/PSD/2309/CPO0014BCD	TR-447f46e4-9570	78.50	0
56	S/PSD/2309/CPO0014BCD	TR-12e680b8-c583	27.78	0
57	S/PSD/2309/CPO0014BCE	TR-d6f15199-d5c8	90.99	0
58	S/PSD/2309/CPO0014BCE	TR-7fa4efac-2d22	77.95	0
59	S/PSD/2309/CPO0045BM	TR-77605488-a84c	78.71	0
60	S/PSD/2309/CPO0045BM	TR-6c666220-04e0	79.45	0
61	S/PSD/2309/CPO0045BM	TR-8ff86911-5b36	39.13	0
62	S/PSD/2309/CPO0049GH	TR-d546700d-482f	116.46	0
63	S/PSD/2309/CPO0045BM	TR-955bda7d-a628	2.71	0
64	S/PSD/2309/CPO0045BOC	TR-1799d314-5247	36.37	0
65	S/PSD/2309/CPO0049GH	TR-5f74ecc8-65c7	118.05	0
66	S/PSD/2309/CPO0045BOC	TR-9e4d4bb1-58f9	117.05	0
67	S/PSD/2309/CPO0049B	TR-848d399a-1b07	78.93	0
68	S/PSD/2309/CPO0014AL	TR-1c41c4cc-0372	105.27	0
69	S/PSD/2309/CPO0096C	TR-e6583c48-7188	1.96	0
70	S/PSD/2309/CPO0096C	TR-11936e76-28c7	78.81	0
71	S/PSD/2309/CPO0096C	TR-80e339b4-3d49	119.23	0
72	S/PSD/2310/CPO0009MA	TR-eeca1eaf-980d	25.00	0
73	S/PSD/2310/CPO0009MI	TR-f41b7304-cd91	5.00	0
74	S/PSD/2310/CPO0009MK	TR-b28968fa-0ba6	5.31	0
75	S/PSD/2310/CPO0009MK	TR-beb864bd-9a7f	38.85	0
76	S/PSD/2310/CPO0009MK	TR-7282a3cc-07a8	118.56	0
77	S/PSD/2310/CPO0009MK	TR-e3bc86c5-d627	87.28	0
78	S/PSD/2310/CPO0009MN	TR-92e9cfac-6837	1.42	0
79	S/PSD/2310/CPO0009MN	TR-1e6c5e87-574f	39.05	0
80	S/PSD/2310/CPO0009MN	TR-0730322d-2005	77.76	0
81	S/PSD/2310/CPO0009MN	TR-a0abdedc-0aa0	116.64	0
82	S/PSD/2310/CPO0009MN	TR-b57c2e50-e202	15.13	0
83	S/PSD/2310/CPO0009MS	TR-b6feaf79-c620	13.24	0
84	S/PSD/2310/CPO0009MS	TR-e0baa49a-807f	116.81	0
85	S/PSD/2310/CPO0009MS	TR-5fd8307f-d46a	79.86	0

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86	S/PSD/2310/CPO0009MS	TR-efcf9b74-bd18	40.09	0
87	S/PSD/2310/CPO0011I	TR-9fd615d0-90f3	31.11	0
88	S/PSD/2310/CPO0011I	TR-28c627eb-bc74	118.89	0
89	S/PSD/2310/CPO0011Q	TR-1f6b0bc3-949b	10.79	0
90	S/PSD/2310/CPO0011Q	TR-e5a0bca9-e6eb	44.91	0
91	S/PSD/2310/CPO0011U	TR-5347ff2b-dcd5	18.71	0
92	S/PSD/2310/CPO0011U	TR-d182d128-3cf9	45.89	0
93	S/PSD/2310/CPO0011U	TR-0ebbe5f8-43c0	107.86	0
94	S/PSD/2310/CPO0011X	TR-2a6fca57-ecd9	32.73	0
95	S/PSD/2310/CPO0011X	TR-55ae342d-4014	79.36	0
96	S/PSD/2310/CPO0011Y	TR-8220481d-fce8	18.20	0
97	S/PSD/2310/CPO0011Y	TR-6dea8d8e-dea4	38.94	0
98	S/PSD/2310/CPO0011Y	TR-74b89d07-20df	113.39	0
99	S/PSD/2310/CPO0011Y	TR-2e09526a-d1b4	79.47	0
100	S/PSD/2311/CPO0036A	TR-876e6ad1-d956	50.35	0
101	S/PSD/2311/CPO0036A	TR-67a424aa-67f3	79.65	0
102	S/PSD/2311/CPO0036B	TR-815b360c-c037	37.51	0
103	S/PSD/2312/CPO0004A	TR-b1005280-aeec	22.78	0
104	S/PSD/2312/CPO0004A	TR-dd0ffb6d-1c26	117.4	0
105	S/PSD/2312/CPO0004A	TR-2eda4426-b2a2	59.82	0
106	S/PSD/2312/CPO0004LC	TR-74561351-a7e4	65.26	0
107	S/PSD/2312/CPO0004LC	TR-4ff46242-eaed	134.74	0
108	S/PSD/2312/CPO0004LE	TR-1f7c283c-772e	11.08	0
109	S/PSD/2312/CPO0004LE	TR-a68e4387-6119	39.62	0
110	S/PSD/2312/CPO0004LE	TR-9bce306b-dc7a	149.30	0
111	S/PSD/2312/CPO0004LK	TR-69215d26-e2d9	15.39	0
112	S/PSD/2312/CPO0004LK	TR-decae4d8-8d49	145.61	0
113	S/PSD/2312/CPO0004LK	TR-08408ef0-e80e	39.00	0
114	S/PSD/2312/CPO0006B	TR-0e37fe43-ed1c	19.78	0
115	S/PSD/2312/CPO0006B	TR-7962ff38-a986	39.59	0
116	S/PSD/2312/CPO0006B	TR-e03701f8-266f	140.63	0
117	S/PSD/2312/CPO0006G	TR-92f3ebd5-56d3	77.80	0
118	S/PSD/2312/CPO0010D	TR-14d41acf-79b7	8.21	0
119	S/PSD/2312/CPO0010D	TR-59ad050a-c43d	91.79	0

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120	S/PSD/2312/CPO0011A	TR-64bd850f-01f7	97.26	0
121	S/PSD/2312/CPO0011A	TR-f901987c-3d15	116.97	0
122	S/PSD/2312/CPO00064	TR-2f450c0c-e71f	157.25	0
123	S/PSD/2312/CPO0006G	TR-917f9c81-d2e8	41.53	0
124	S/PSD/2312/CPO0011A	TR-72e1420a-2679	35.77	0
125	S/PSD/2312/CPO0012A	TR-7f54454f-d96b	79.32	0
126	S/PSD/2312/CPO0006G	TR-42481d2a-dfb8	5.67	0
127	S/PSD/2312/CPO0012A	TR-42d7d3e2-de59	151.64	0
128	S/PSD/2312/CPO0012A	TR-7db18ad1-288e	19.04	0
129	S/PSD/2312/CPO0012B	TR-d165accf-4a2a	99.59	0
130	S/PSD/2312/CPO0012B	TR-4b786451-ab42	79.86	0
131	S/PSD/2312/CPO0007BO	TR-8d6dc429-6cc8	117.82	0
132	S/PSD/2312/CPO0012B	TR-b5dc3462-f539	38.34	0
133	S/PSD/2312/CPO0007BO	TR-d5d22e12-5838	79.52	0
134	S/PSD/2312/CPO0012B	TR-80b60e83-dc77	32.21	0
135	S/PSD/2312/CPO0014L	TR-862079ca-a090	83.26	0
136	S/PSD/2312/CPO0007BO	TR-71cebd1d-8932	2.66	0
137	S/PSD/2312/CPO0014L	TR-9d5f9cd9-d28e	113.47	0
138	S/PSD/2312/CPO0063C	TR-4303abe3-4112	79.62	0
139	S/ICH/2312/CPO0066B	TR-5024e518-811a	116.51	0
140	S/PSD/2312/CPO0014L	TR-9eb08af3-fb37	3.27	0
141	S/PSD/2312/CPO0063C	TR-a3f9112b-be0a	5.49	0
142	S/PSD/2312/CPO0063C	TR-ca73cd3c-7a6e	114.89	0
143	S/PSD/2312/CPO0063J	TR-74fcee6-85e4	38.56	0
144	S/PSD/2312/CPO0063J	TR-a2eeceeb-a54e	151.26	0
145	S/PSD/2312/CPO0063N	TR-49199ebb-08ec	79.72	0
146	S/PSD/2401/CPO0004J	TR-6e7bdb68-be94	39.05	0
147	S/PSD/2401/CPO0004J	TR-d38a88e2-17a2	39.87	0
148	S/PSD/2401/CPO0004M	TR-4cec3f8f-5a2e	5.60	0
149	S/PSD/2401/CPO0004M	TR-ed26e78e-0009	102.66	0
150	S/PSD/2401/CPO0004M	TR-ec84d524-a8da	79.54	0
151	S/PSD/2401/CPO0006C	TR-3bcd5f8a-2c0e	15.72	0
152	S/PSD/2401/CPO0006C	TR-920b93a7-6548	77.34	0
153	S/PSD/2401/CPO0006C	TR-4cb8fbee-dc79	156.94	0

154	S/PSD/2401/CPO0010D	TR-319c850d-c709	74.51	0
155	S/PSD/2401/CPO0002F	TR-f7f2674a-25b4	40.54	0
156	S/PSD/2401/CPO0004J	TR-427f9804-3763	2.57	0
157	S/PSD/2401/CPO0010D	TR-fa58d778-f2df	37.18	0
158	S/PSD/2401/CPO0002F	TR-0f4b72e6-957f	2.48	0
159	S/PSD/2401/CPO0006Q	TR-3ca7fd17-20ba	120.18	0
160	S/PSD/2401/CPO0010D	TR-c9bb42fd-efc6	33.92	0
161	S/PSD/2401/CPO0006Q	TR-1db57b64-6675	114.36	0
162	S/PSD/2401/CPO0007G	TR-bcd7d044-f90c	118.5	0
163	S/PSD/2401/CPO0006Q	TR-dc12fbe6-1252	15.46	0
164	S/PSD/2401/CPO0007G	TR-55325828-6c91	78.06	0
165	S/PSD/2401/CPO0009I	TR-6b8eddc9-edca	63.51	0
166	S/PSD/2401/CPO0007G	TR-2b4284ff-4827	3.44	0
167	S/PSD/2401/CPO0009I	TR-a7f98952-5a41	114.19	0
168	S/PSD/2401/CPO0009J	TR-18f03f14-f157	39.73	0
169	S/PSD/2401/CPO0009I	TR-89b1a505-77f0	22.30	0
170	S/PSD/2401/CPO0009J	TR-eedbfbba-8f92	134.14	0
171	S/PSD/2401/CPO0009J	TR-82af6e74-1399	26.13	0
172	S/PSD/2402/CPO0002F	TR-9e9c0175-367f	50.92	0
173	S/PSD/2402/CPO0004A	TR-22a9ae19-b3be	40.15	0
174	S/PSD/2402/CPO0002F	TR-af51b00d-ef83	24.08	0
175	S/PSD/2402/CPO0004A	TR-73430da3-9018	132.79	0
176	S/PSD/2402/CPO0004A	TR-7483db93-fd4d	39.66	0
177	S/PSD/2402/CPO0004I	TR-0574bc76-5a86	79.07	0
178	S/PSD/2402/CPO0004I	TR-6612aaab-0b02	39.44	0
179	S/PSD/2402/CPO0005B	TR-2c6121d4-fee5	79.15	0
180	S/PSD/2402/CPO0004I	TR-69e72dd9-a357	31.49	0
181	S/PSD/2402/CPO0005B	TR-0f48a764-9209	39.35	0
182	S/PSD/2402/CPO0007A	TR-9a932e0e-d268	8.36	0
183	S/PSD/2402/CPO0005B	TR-b37333b3-9236	8.01	0
184	S/PSD/2402/CPO0007A	TR-acb479ff-fc4b	20.82	0
185	S/PSD/2402/CPO0008B	TR-d1bf706e-0cc9	127.19	0
186	S/PSD/2402/CPO0004G	TR-adb3fbc6-42e3	116.88	0
187	S/PSD/2402/CPO0008B	TR-4c48efd9-c6d7	38.98	0

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188	S/PSD/2402/CPO0004G	TR-3419edf0-180e	82.69	0
189	S/PSD/2402/CPO0008B	TR-4206b548-de2a	33.83	0
190	S/PSD/2403/CPO0015	TR-b46565a5-81fa	138.85	0
191	S/PSD/2404/CPO0021	TR-28c9efbb-7839	155.45	0
192	S/PSD/2404/CPO0009A	TR-6398ecf9-2265	79.28	0
193	S/PSD/2404/CPO0009A	TR-6c11a57c-99af	119.2	0
194	S/PSD/2404/CPO0009A	TR-31a8fe85-b6a1	1.52	0
195	S/PSD/2404/CPO0011A	TR-5b2a0e89-46e1	76.92	0
196	S/PSD/2404/CPO0011A	TR-f24ea0ee-f35a	78.95	0
197	S/PSD/2404/CPO0009B	TR-77bd6d11-ff21	21.65	0
198	S/PSD/2404/CPO0009C	TR-6eb304e7-0744	57.61	0
199	S/PSD/2404/CPO0011A	TR-1953b999-3183	38.88	0
200	S/PSD/2404/CPO0009C	TR-121b1e05-24b3	34.6	0
201	S/PSD/2404/CPO0011A	TR-91cea9b5-6838	5.25	0
202	S/PSD/2404/CPO0011H	TR-f883ba47-9fba	79.50	0
203	S/PSD/2404/CPO0009C	TR-8b6d928e-978f	17.72	0
204	S/PSD/2404/CPO0009F	TR-db3fb4fa-baf3	39.79	0
205	S/PSD/2404/CPO0011H	TR-cef9c3b7-c97b	21.38	0
206	S/PSD/2404/CPO0009F	TR-9230096c-79c2	6.95	0
207	S/PSD/2404/CPO0011H	TR-b533be28-5977	6.74	0
208	S/PSD/2405/CPO0001BE	TR-9c042809-f1c4	105.49	0
209	S/PSD/2405/CPO0001BE	TR-1b4550dd-cfeb	79.02	0
210	S/PSD/2405/CPO0003B	TR-dd3e1d94-c926	39.48	0
211	S/PSD/2404/CPO0021	TR-89591361-a82c	69.87	0
212	S/PSD/2405/CPO0001BE	TR-b6d6866d-a69a	15.49	0
213	S/PSD/2405/CPO0003B	TR-e931ebdf-9158	103.52	0
214	S/PSD/2405/CPO0026	TR-11f336c0-6b07	1,317.96	0
215	S/ICH/2405/CPO0069	TR-194744de-bfb2	198.30	0
216	S/PSD/2405/CPO0026	TR-8b1cbbba-0738	234.25	0
217	S/PSD/2406/CPO0003	TR-d0240ba4-cb0e	25.00	0
218	S/PSD/2406/CPO0004B	TR-c2a6784c-8373	13.96	0
219	S/PSD/2406/CPO0004B	TR-924ef039-b996	40.60	0
220	S/PSD/2406/CPO0004B	TR-cddc0a6d-036e	95.44	0
221	S/PSD/2406/CPO0004G	TR-14cb2c13-3ab0	34.56	0

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222	S/PSD/2406/CPO0004G	TR-584ac609-010f	40.44	0
223	S/PSD/2406/CPO0004K	TR-6455a922-b696	39.76	0
224	S/PSD/2406/CPO0004K	TR-58cd9de1-9a02	105.74	0
225	S/PSD/2406/CPO0004K	TR-03ce7214-be6e	79.50	0
226	S/PSD/2406/CPO0007F	TR-12306d5c-c3ab	34.92	0
227	S/PSD/2406/CPO0007F	TR-535b59d3-0345	79.05	0
228	S/PSD/2406/CPO0007F	TR-8c08c3a2-7acb	80.64	0
229	S/PSD/2406/CPO0007F	TR-b3e781f6-31e9	5.39	0
230	S/PSD/2406/CPO0007I	TR-7e90e5bf-d081	35.08	0
231	S/PSD/2406/CPO0007I	TR-88dc6c65-cbbf	40.30	0
232	S/PSD/2406/CPO0007I	TR-6a594741-ef35	84.42	0
233	S/PSD/2406/CPO0007I	TR-25c319f7-2752	40.20	0
234	S/PSD/2406/CPO0009H	TR-7cec1aeb-81f0	44.37	0
235	S/PSD/2406/CPO0009H	TR-817f2e52-72a1	79.14	0
TOTAL			14,682.23	4,173.96

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 (Aug 2023 – July 2024)

No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Mxxxx Oxxx	274.34	-
2	Mxxxxxxx	432.11	-
3	Sxxxxxxxxx	-	182.51
4	Pxxx Ox	-	223.00
5	Hxx Hxxx	-	258.00
TOTAL		706.45	663.51

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
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1	N/A	N/A	N/A
TOTAL			N/A

12. Independent Smallholders Certified Tonnage (MT) / Volume

	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit

No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
1	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A

Note: 1 mt = 1 credit

13. Independent Smallholders Actual Sold Tonnage / Volume

	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit

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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)

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Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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

Website: www.bsigroup.com

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **19/08/2024 – 22/08/2024**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **25/10/2024**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Chaah POM	✓	✓	✓	✓	✓
Chaah Estate	✓	✓	✓	✓	✓
North Labis Estate	✓	✓	✓	✓	✓
Sg. Simpang Kiri Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: August 18, 2025 - August 22, 2025

Total Number of Mandays: 12 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Mohamed Hidhir Zainal Abidin (MHZ)	Team Leader	<p>Education: Bachelor Degree in Chemical Engineering, National University of Malaysia, 2006</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 7 years working experience in palm oil industry specifically on palm oil milling for 5 years 2) Auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO since 2012 <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 9001 Lead Auditor Course 2) ISO 14001 Lead Auditor Course 3) OHSAS 18001 Lead Auditor Course in 2012 4) Endorsed RSPO P&C Lead Auditor Course in 2013 5) MSPO Awareness Training in 2014 6) Endorsed RSPO SCCS Lead Auditor Course 7) SMETA Auditor training <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p>

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

		<p>the day-to-day plantation operations before joining FGV Holdings Berhad as Sustainability Officer for another significant numbers of years. In his career at FGV, Fahmi had accumulated more than 7 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans</p> <p>Training attended: He has completed CQI – IRCA approved ISO 9001, and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course as well as SA 8000.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input 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
N/A	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	MHZA	FBO	MAS
Sunday 18/08/2024	PM	Audit team travel Kluang. Check in at Anika Hotel, Kluang	√	√	√
Monday 19/08/2024	0730 0830 0900	<p>Audit team travel to Chaah Estate for opening meeting</p> <p>Opening Meeting:</p> <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). Verification on previous audit findings 	√	√	√
Chaah Estate					

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	0930	Chaah Estate	√	√	√
	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, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1300	Lunch	√	√	√
	1400				
	1400 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).	√	√	√
Tuesday 20/08/2024	1630 1700	Interim Closing Briefing	√	√	√
	0730	Audit team travel to Chaah POM (request for pickup from Anika Hotel)	√	√	√
	0830 1300	Chaah POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.			
	1000 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	√
	1300 1400	Lunch break	√	√	√
Chaah POM	1400 1630	Chaah POM Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc RSPO Supply chain requirements for mill - Identity Preserved & Mass Balance Model	√	√	√

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		<ul style="list-style-type: none"> - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Rules on Market Communication and Claims 			
	1630	Interim Closing Briefing	√	√	√
	1700				
Wednesday 21/08/2024	0730	Audit team travel to Simpang Kiri Estate	√	√	√
Simpang Kiri Estate	0830	Simpang Kiri Estate			
	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, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1000	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	√
	1300	Lunch break	√	√	√
	1300	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	Interim Closing Briefing	√	√	√
	1700				
Thursday 22/08/2024	0730	Audit team travel to North Labis Estate	√	√	√
North Labis Estate	0830	North Labis Estate			
	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, Schedule waste management, worker housing, clinic, Landfill, etc.			

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1000 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	✓
1000 1300	Lunch break	✓	✓	✓
1300 1530	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).	✓	✓	✓
1530 1630	Audit team discussion	✓	✓	✓
1630 1730	Closing meeting – conclusion and recommendation	✓	✓	✓

Major NC close out

PRELIMINARY AGENDA		
Time	Subjects	MHZ
Friday 25/10/2024		
0730	Audit team travel to Chaah Estate (request for transport to Chaah POM)	✓
0830 – 0900	Opening Meeting (Chaah POM) <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Briefing on the verification plan 	
0900 – 1130	Major NC verification <ul style="list-style-type: none"> 2538469-202408-M1 – Document review and management/worker's interview and site observation. 2538469-202408-M2 – Document review and management/worker's interview. 	✓
1130 - 1200	Closing meeting – conclusion and recommendation	✓

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	SD Guthrie Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table. On 16/01/2020, SD Guthrie Berhad under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://sime-darbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SD Guthrie Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As of Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently SD Guthrie Berhad have no control in the management. Refer TBP approval dated 13/07/2023.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	There are no new acquisitions. There is new propose on 2024 for Land legalization still in progress dated approval by RSPO on 13 July 2023 for these Estate. (1) Ladang Panjang Estate: 1,796.19 Ha. (2) Rantau Panjang Estate, Napal Estate / Karang Ringin Estate: 1,843.73 Ha. (3) Mangun Jaya Estate: 1,398.55 Ha. (4) Sungai Jernih Estate: 851.57 Ha. (5) Pelanjau Estate (PT BAL) & Beturus Estate (PT BAL): 4,071.76 Ha. (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

<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.</p> <p>Is this consistent with the ACOP reporting?</p>	<p><u>Indonesia</u></p> <ul style="list-style-type: none"> - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. - PT Mitral Austral Sejahtera: The properties were sold and currently SD Guthrie Berhad (at the point of this audit 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><u>Malaysia</u></p> <ul style="list-style-type: none"> - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. - Bintang Oil Mill: SD Guthrie Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction. <p><u>Papua New Guinea</u></p> <ul style="list-style-type: none"> - Markham Farming Company Limited (MFCL)/ Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement <p><u>Liberia</u></p> <ul style="list-style-type: none"> - As at 16/01/2020, SD Guthrie Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/. <p>ACOP 2022 has been cross-referenced as below: https://rspo.org/members/1-0008-04-000-00/</p>	<p>Complied</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 that these units are still awaiting to receive land titles.</p>	<p>Complied</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	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/ 2023.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within SD Guthrie Berhad that have completed NPP notification:</p> <p>(1) NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</p> <p>(2) NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/ 2018 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiidiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/</p> <p>(3) NBPOL (Ramu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</p> <p>(4) NBPOL (Ramu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</p> <p>(5) NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</p> <p>(6) NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/</p> <p>(7) NBPOL (Poliamba Limited – Lamendauen) 07/04/ 2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/</p> <p>(8) NBPOL (Roka Mini estate) 04/11/2013</p>	Complied

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	<p>– no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/</p> <p>(9) NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</p> <p>(10) NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</p> <p>(11) NBPOL (Ramu Agri Industries Ltd) 06/03/2012 – no comments captured in RSPO website: https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</p> <p>(12) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</p> <p>(13) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</p> <p>(14) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</p> <p>Management units for 12 – 14 above were disposed.</p>	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of October 2024 (RaCP tracker latest update 24/10/24), 19 out of 21 management units in Indonesia operations completed LUCA review with 8 Concept Note (CN) required (4 CN submitted, 4 NC approved).</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</p>	Complied

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

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 are maintaining the 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.	There are no scheme smallholders and/ or outgrowers include in the scope of certification.	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	13,836.00	Certified	N/A	23-Nov-10					
	Indonesia	Manggala -1 Estate	4,919.00	Certified	N/A	23-Nov-10					
	Indonesia	Manggala -2 Estate	4,922.00	Certified	N/A	23-Nov-10					
	Indonesia	Manggala -3 Estate	3,995.00	Certified	N/A	23-Nov-10					
Alur Dumai	Indonesia	Alur Dumai Mill	3,759.00	Certified	N/A	16-Jan-12					
	Indonesia	Alur Dumai Estate	3,759.00	Certified	N/A	16-Jan-12					
Teluk Siak	Indonesia	Teluk Siak Mill	11,555.31	Certified	N/A	11-Oct-11					
	Indonesia	Teluk Siak Estate	3,321.20	Certified	N/A	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	3,799.21	Certified	N/A	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	448.00	Not Certified	2023	N/A		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	N/A	11-Oct-11					

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Blang Simpo	Indonesia	Blang Simpo Mill	8,777.22	Certified	N/A	3-May-13					
	Indonesia	Blang Simpo -1 Estate	3,460.06	Certified	N/A	3-May-13					
	Indonesia	Blang Simpo -2 Estate	2,677.83	Certified	N/A	3-May-13					
	Indonesia	Tamiang (PT PPP) Estate	1,451.99	Certified	N/A	3-May-13					
	Indonesia	Batang Ara (PT PSK) Estate	1,187.34	Certified	N/A	3-May-13					

Teluk Bakau	Indonesia	Teluk Bakau Mill	13,317.81	Certified	N/A	11-Oct-11					
	Indonesia	Teluk Bakau Estate	4,025.07	Certified	N/A	11-Oct-11					
	Indonesia	Nusa Lestari Estate	3,456.74	Certified	N/A	11-Oct-11					
	Indonesia	Nusa Perkasa Estate	5,836.00	Certified	N/A	11-Oct-11					
Mandah	Indonesia	Mandah Mill	12,366.18	Certified	N/A	1-Apr-14					
	Indonesia	Mandah Estate	5,053.18	Certified	N/A	1-Apr-14					
	Indonesia	Rotan Semelur Estate	7,313.00	Certified	N/A	1-Apr-14					
Sungai Pinang	Indonesia	Sungai Pinang Mill	6.51	Certified	N/A	11-Sep-12					
	Indonesia	Sungai Pinang Estate	3,374.42	Certified	N/A	11-Sep-12					
	Indonesia	Bukit Pinang Estate	3,138.58	Certified	N/A	11-Sep-12					
Ladang Panjang	Indonesia	Ladang Panjang Mill	1,202.04	Certified	N/A	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,202.04	Certified	N/A	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,796.19	Not Certified	2023	NA		Yes	2024	Land legalization process for 1,796.19 ha is still in progress.	13-Jul-23

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Rantau Panjang	Indonesia	Rantau Panjang Mill	10,139.91	Certified	N/A	16-Mar-12					
	Indonesia	Bumi Ayu Estate	2,960.98	Certified	N/A	16-Mar-12					
	Indonesia	Rantau Panjang Estate	2,679.74	Certified	N/A	16-Mar-12					
	Indonesia	Rantau Panjang Estate	1,843.73	Not Certified	2023	NA		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Napal Estate/Karang Ringin	4,359.74	Certified	N/A	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 /	13-Jul-23
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										Karang Ringin Estate is still in process.	
	Indonesia	Mangun Jaya Estate	139.45	Certified	N/A	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	N/A	6-Jul-11					
	Indonesia	Angsana Estate	3,250.06	Certified	N/A	6-Jul-11					
	Indonesia	Gunung Sari Estate	2,826.94	Certified	N/A	6-Jul-11					
Mustika	Indonesia	Mustika Mill	14,840.76	Certified	N/A	3-Jul-13					
	Indonesia	Mustika Estate	3,648.74	Certified	N/A	3-Jul-13					
	Indonesia	Pantai Bonati Estate	2,534.00	Certified	N/A	6-Jul-11					
Gunung Aru	Indonesia	Gunung Aru Mill	12,740.54	Certified	N/A	5-Jul-11					
	Indonesia	Gunung Aru Estate	2,684.41	Certified	N/A	5-Jul-11					
	Indonesia	Gunung Kemasan Estate	3,511.36	Certified	N/A	5-Jul-11					

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	Indonesia	Laut Timur Estate	3,207.28	Certified	N/A	5-Jul-11					
	Indonesia	Pantai Timur Estate	3,337.49	Certified	N/A	5-Jul-11					
Ungkaya	Indonesia	Ungkaya Mill	4,145.00	Certified	N/A	10-Jul-12					
	Indonesia	Ungkaya Estate	4,145.00	Certified	N/A	10-Jul-12					
Rantau	Indonesia	Rantau Mill	24,169.56	Certified	N/A	30-Dec-11					
	Indonesia	Rantau Estate	4,638.00	Certified	N/A	30-Dec-11					
	Indonesia	Matalok Estate	3,082.00	Certified	N/A	30-Dec-11					
	Indonesia	Selabak Estate (PT SAA)	3,757.67	Certified	N/A	16-Mar-12					
	Indonesia	Randi Estate (PT SAA)	2,882.98	Certified	N/A	16-Mar-12					
	Indonesia	Sangkoh Estate (PT SAA)	3,789.34	Certified	N/A	16-Mar-12					
	Indonesia	Lanting Estate (PT LMR)	3,249.27	Certified	N/A	16-Mar-12					
Betung	Indonesia	Betung Mill	7,579.57	Certified	N/A	1-Apr-14					
	Indonesia	Betung Estate	4,266.00	Certified	N/A	1-Apr-14					
	Indonesia	Sekayu Estate	3,313.57	Certified	N/A	1-Apr-14					
Bebunga	Indonesia	Bebunga Mill	14,274.77	Certified	N/A	16-Mar-12					
	Indonesia	Bebunga Estate	3,958.43	Certified	N/A	16-Mar-12					
	Indonesia	Bakau Estate	5,342.14	Certified	N/A	16-Mar-12					
	Indonesia	Sungai Cengal Estate	4,974.20	Certified	N/A	16-Mar-12					
Pondok Labu	Indonesia	Pondok Labu Mill	15,876.20	Certified	N/A	16-Mar-12					
	Indonesia	Pondok Labu Estate	3,569.53	Certified	N/A	16-Mar-12					
	Indonesia	Binturung Estate	4,072.01	Certified	N/A	16-Mar-12					
	Indonesia	Rampa Estate	3,656.20	Certified	N/A	16-Mar-12					
	Indonesia	Sesulung Estate	4,578.46	Certified	N/A	16-Mar-12					
Sekunyir	Indonesia	Sekunyir Mill	7,734.59	Certified	N/A	23-Nov-10					

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Sukamandang	Indonesia	Sekunzir Estate	3,555.19	Certified	N/A	23-Nov-10					
	Indonesia	Seruyan Estate	4,179.40	Certified	N/A	23-Nov-10					
	Indonesia	Sukamandang Mill	14,779.92	Certified	N/A	5-Jul-11					
	Indonesia	Sukamandang Estate	3,936.56	Certified	N/A	5-Jul-11					
	Indonesia	Sapiri Estate	3,530.90	Certified	N/A	5-Jul-11					
	Indonesia	Baras Danum Estate	3,664.60	Certified	N/A	5-Jul-11					
	Indonesia	Kuala Kuayan Estate	3,647.86	Certified	N/A	5-Jul-11					
Pemantang	Indonesia	Pemantang Mill	16,601.66	Certified	N/A	5-Jul-11					
	Indonesia	Pemantang Estate	3,857.91	Certified	N/A	5-Jul-11					
	Indonesia	Kawan Batu Estate	4,400.00	Certified	N/A	5-Jul-11					
	Indonesia	Hatantiring Estate	3,811.00	Certified	N/A	5-Jul-11					
	Indonesia	Batang Garing Estate	4,532.75	Certified	N/A	5-Jul-11					
Lembiru	Indonesia	Lembiru Mill	9,409.07	Certified	N/A	3-Jul-14					
	Indonesia	Lembiru Estate	4,929.49	Certified	N/A	3-Jul-14					
	Indonesia	Awatan Estate	3,476.79	Certified	N/A	3-Jul-14					
	Indonesia	Pelanjau Estate (PT BAL)	1,002.79	Certified	N/A	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

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	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	N/A	18-Oct-10					
	Indonesia	West Estate	4,562.34	Certified	N/A	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	N/A	18-Oct-10					
	Indonesia	East Estate/Sei Mawang	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization	13-Jul-23

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										n process for 1452.93 ha (West and East Estate) is still in process.	
Sungai Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	N/A	12-Aug-10					
	Malaysia	Anak Kulim Estate	1,523.35	Certified	N/A	12-Aug-10					
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	N/A	12-Aug-10					
	Malaysia	Somme Estate	941.56	Certified	N/A	12-Aug-10					
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	N/A	12-Aug-10					
	Malaysia	Padang Buluh Estate	4,008.47	Certified	N/A	12-Aug-10					
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	N/A	12-Aug-10					
	Malaysia	Jentayu Estate	2,178.59	Certified	N/A	12-Aug-10					
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	N/A	5-Oct-11					
	Malaysia	Chersonese Estate	3,293.72	Certified	N/A	5-Oct-11					
	Malaysia	Kalumpang Estate	2,716.80	Certified	N/A	5-Oct-11					

	Malaysia	Tali Ayer Estate	3,756.10	Certified	N/A	5-Oct-11					
	Malaysia	Holyrood Estate	1,332.74	Certified	N/A	5-Oct-11					
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	N/A	18-Jun-11					
	Malaysia	Kamuning Estate	3,888.43	Certified	N/A	18-Jun-11					
	Malaysia	Elphil Estate	1,865.43	Certified	N/A	18-Jun-11					
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	N/A	18-Jun-11					
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	N/A	5-Oct-11					

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	Malaysia	Flemington Estate	1,906.84	Certified	N/A	5-Oct-11					
	Malaysia	Bagan Datoh Estate	3,781.86	Certified	N/A	5-Oct-11					
	Malaysia	Sabak Bernam Estate	2,511.79	Certified	N/A	5-Oct-11					
	Malaysia	Sg. Samak Estate	3,025.74	Certified	N/A	5-Oct-11					
Seri Intan/ Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	N/A	3-Mar-11					
	Malaysia	Selaba Oil Mill	1,549.75	Certified	N/A	3-Mar-11					
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	N/A	3-Mar-11					
	Malaysia	Sabrang Estate	3,945.23	Certified	N/A	3-Mar-11					
	Malaysia	Sogomana Estate	2,214.08	Certified	N/A	3-Mar-11					

	Malaysia	Sg. Wangi Estate	2,226.66	Certified	N/A	3-Mar-11					
	Malaysia	Bikam Estate	2,075.16	Certified	N/A	3-Mar-11					
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	N/A	3-Mar-11					
Tennamaram	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	N/A	3-Mar-11					
	Malaysia	Tennamaram Estate	1,981.60	Certified	N/A	3-Mar-11					
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	N/A	3-Mar-11					
	Malaysia	Bukit Talang Estate	3,572.44	Certified	N/A	3-Mar-11					
Bukit Kerayong	Malaysia	Bukit Kerayong Oil Mill	6,346.90	Certified	N/A	15-Apr-11					
	Malaysia	Bukit Kerayong Estate	2,699.28	Certified	N/A	15-Apr-11					
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	N/A	15-Apr-11					
East	Malaysia	East Oil Mill	10,902.94	Certified	N/A	19-May-10					
	Malaysia	East Estate	5,634.45	Certified	N/A	19-May-10					
	Malaysia	Sepang Estate	2,092.28	Certified	N/A	19-May-10					
	Malaysia	Dusun Durian Estate	3,176.21	Certified	N/A	19-May-10					
West	Malaysia	West Oil Mill	5,912.69	Certified	N/A	19-May-10					

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	Malaysia	West Estate	5,912.69	Certified	N/A	19-May-10					
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Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	N/A	7-Jul-11					
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	N/A	7-Jul-11					
Kerdu	Malaysia	Kerdu Oil Mill	13,781.50	Certified	N/A	7-Jul-11					
	Malaysia	Kerdu Estate	5,683.04	Certified	N/A	7-Jul-11					
	Malaysia	Mentakab Estate	3,266.49	Certified	N/A	7-Jul-11					
	Malaysia	Chenor Estate	2,834.98	Certified	N/A	7-Jul-11					
	Malaysia	Sg Mai Estate	1,996.99	Certified	N/A	7-Jul-11					
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	N/A	7-Jul-11					
	Malaysia	Jabor Estate	2,332.92	Certified	N/A	7-Jul-11					
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	N/A	30-Dec-11					
	Malaysia	Labu Estate	4,529.72	Certified	N/A	30-Dec-11					
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	N/A	19-May-10					
	Malaysia	Tanah Merah Estate	4,341.73	Certified	N/A	19-May-10					
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	N/A	19-May-10					
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	N/A	18-Feb-14					
	Malaysia	Sua Betong Estate	2,870.75	Certified	N/A	18-Feb-14					

	Malaysia	Sengkang Estate	2,831.51	Certified	N/A	18-Feb-14					
	Malaysia	Bradwall Estate	3,828.34	Certified	N/A	18-Feb-14					
	Malaysia	PD Lukut Estate	1,523.79	Certified	N/A	18-Feb-14					
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	N/A	18-Feb-14					
	Malaysia	Sg. Bahru Estate	1,427.31	Certified	N/A	18-Feb-14					
	Malaysia	Salak Estate	3,868.86	Certified	N/A	18-Feb-14					

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Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	N/A	7-Jul-11					
	Malaysia	Muar River Estate	1,584.62	Certified	N/A	7-Jul-11					
	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	N/A	7-Jul-11					
	Malaysia	Kok Foh Estate	2,275.84	Certified	N/A	7-Jul-11					
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	N/A	7-Jul-11					
	Malaysia	St. Helier Estate	1,992.65	Certified	N/A	7-Jul-11					
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	N/A	7-Jul-11					
	Malaysia	Pertang Estate	1,052.49	Certified	N/A	7-Jul-11					
Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	N/A	20-May-10					
	Malaysia	Kempas Estate	4,505.45	Certified	N/A	20-May-10					

	Malaysia	Tangkah Estate	2,537.78	Certified	N/A	20-May-10					
	Malaysia	Kemuning Estate	2,671.05	Certified	N/A	20-May-10					
	Malaysia	Serkam Estate	2,114.23	Certified	N/A	20-May-10					
Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	N/A	5-Oct-11					
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	N/A	5-Oct-11					
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	N/A	5-Oct-11					
	Malaysia	Welch Estate	1,447.82	Certified	N/A	5-Oct-11					
Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	N/A	28-Jan-14					
	Malaysia	Pagoh Estate	2,325.93	Certified	N/A	28-Jan-14					
	Malaysia	Lanadron Estate	1,964.44	Certified	N/A	28-Jan-14					
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	N/A	28-Jan-14					
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	N/A	18-Nov-10					
	Malaysia	Chaah Estate	2,795.36	Certified	N/A	18-Nov-10					
	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	N/A	18-Nov-10					

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	Malaysia	North Labis Estate	3,532.91	Certified	N/A	18-Nov-10					
Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	N/A	19-May-10					
	Malaysia	Gunung Mas Estate	3,466.17	Certified	N/A	19-May-10					
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	N/A	19-May-10					
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	N/A	19-May-10					
	Malaysia	Yong Peng Estate	2,975.41	Certified	N/A	19-May-10					
Bukit Benut	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	N/A	5-Oct-11					
	Malaysia	Bukit Benut Estate	2,799.78	Certified	N/A	5-Oct-11					
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	N/A	5-Oct-11					
	Malaysia	CEP Nyior Estate	1,955.19	Certified	N/A	5-Oct-11					
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	N/A	11-Apr-11					
	Malaysia	Ulu Remis Estate	2,598.25	Certified	N/A	11-Apr-11					
	Malaysia	Cenas Estate	1,974.06	Certified	N/A	11-Apr-11					
	Malaysia	Bukit Badak Estate	3,234.25	Certified	N/A	11-Apr-11					
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	N/A	11-Apr-11					
	Malaysia	Pekan Estate	3,258.70	Certified	N/A	11-Apr-11					
	Malaysia	Sembrong Estate	1,778.88	Certified	N/A	11-Apr-11					
Hadapan	Malaysia	Hadapan Palm Oil Mill	11,371.82	Certified	N/A	29-Mar-11					
	Malaysia	Sri Pulai Estate	2,049.87	Certified	N/A	29-Mar-11					
	Malaysia	Kulai Estate	3,023.42	Certified	N/A	29-Mar-11					
	Malaysia	Layang Estate	3,258.90	Certified	N/A	29-Mar-11					
	Malaysia	CEP Renggam Estate	3,039.63	Certified	N/A	29-Mar-11					
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	N/A	1-Oct-08					

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	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	N/A	1-Oct-08					
	Malaysia	Tunku Estate	3,199.05	Certified	N/A	1-Oct-08					
	Malaysia	Tigowis Estate	2,074.02	Certified	N/A	1-Oct-08					
	Malaysia	Sentosa Estate	3,545.54	Certified	N/A	1-Oct-08					
	Malaysia	Segaliud Estate	4,820.13	Certified	N/A	1-Oct-08					
Melalap	Malaysia	Melalap Oil Mill	5,246.18	Certified	N/A	21-Jan-11					
	Malaysia	Melalap Estate	2,096.73	Certified	N/A	21-Jan-11					
	Malaysia	Sapong Estate	3,149.45	Certified	N/A	21-Jan-11					
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	N/A	16-Jan-09					
	Malaysia	Binuang Estate	3,271.08	Certified	N/A	16-Jan-09					

	Malaysia	Sungang Estate	3,407.98	Certified	N/A	16-Jan-09					
	Malaysia	Tingayu Estate	1,881.08	Certified	N/A	16-Jan-09					
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	N/A	16-Jan-09					
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	N/A	16-Jan-09					
	Malaysia	Giram Estate	4,166.98	Certified	N/A	16-Jan-09					
	Malaysia	Mostyn Estate	4,178.04	Certified	N/A	16-Jan-09					
Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	N/A	16-Jan-09					
	Malaysia	Merotai Estate	3,052.66	Certified	N/A	16-Jan-09					
	Malaysia	Imam Estate	3,773.56	Certified	N/A	16-Jan-09					
	Malaysia	Tiger Estate	2,497.86	Certified	N/A	16-Jan-09					
	Malaysia	Table Estate	2,221.63	Certified	N/A	16-Jan-09					
Layang	Malaysia	Lavang Oil Mill	24,836.54	Certified	N/A	30-Dec-11					
	Malaysia	Lavang Estate	4,363.83	Certified	N/A	30-Dec-11					
	Malaysia	Rasan Estate	3,454.00	Certified	N/A	30-Dec-11					

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	Malaysia	Belian Estate	2,847.00	Certified	N/A	30-Dec-11					
	Malaysia	Kelida Estate	2,460.00	Certified	N/A	30-Dec-11					
	Malaysia	Lavang (Special) Estate	included under Lavang Estate H	Certified	N/A	30-Dec-11					
	Malaysia	Pekaka Estate	2,626.14	Certified	N/A	30-Dec-11					
	Malaysia	Ruai Estate	2,460.96	Certified	N/A	30-Dec-11					
	Malaysia	Dulang Estate	2,548.00	Certified	N/A	30-Dec-11					
	Malaysia	Charquest Estate	1,448.71	Certified	N/A	30-Dec-11					
	Malaysia	Paroh Estate	2,627.90	Certified	N/A	30-Dec-11					
Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	N/A	30-Dec-11					
	Malaysia	Rajawali Estate	6,087.27	Certified	N/A	30-Dec-11					
	Malaysia	Samudera Estate	3,308.60	Certified	N/A	30-Dec-11					
	Malaysia	Semarak Estate	2,248.68	Certified	N/A	30-Dec-11					
	Malaysia	Bayu Estate	2,459.90	Certified	N/A	30-Dec-11					
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	N/A	30-Dec-11					
	Malaysia	Derawan Estate	2,490.79	Certified	N/A	30-Dec-11					
	Malaysia	Sahua Estate	2,644.00	Certified	N/A	30-Dec-11					
	Malaysia	Takau Estate	2,107.00	Certified	N/A	30-Dec-11					
	Malaysia	Damai Estate	2,287.04	Certified	N/A	30-Dec-11					

Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	N/A	18-Mar-11					
	Solomon Islands	Tetere Estate	2,947.79	Certified	N/A	18-Mar-11					
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	N/A	18-Mar-11					
	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	N/A	18-Mar-11					
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	N/A	18-Mar-11					

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	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	N/A	18-Mar-11					
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	N/A	18-Mar-11					
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	N/A	18-Mar-11					
Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	N/A	15-Feb-13					
	Papua New Guinea	Giligili Estate	1,095.47	Certified	N/A	15-Feb-13					
	Papua New Guinea	Hagita Estate	2,450.02	Certified	N/A	15-Feb-13					
	Papua New Guinea	Waigani Estate	2,341.13	Certified	N/A	15-Feb-13					
	Papua New Guinea	Sagarai Estate	2,864.55	Certified	N/A	15-Feb-13					
	Papua New Guinea	Padipadi Estate	4,517.67	Certified	N/A	15-Feb-13					
	Papua New Guinea	Mariawatte Estate	1,680.14	Certified	N/A	15-Feb-13					
	Papua New Guinea	Smallholders - East Gurney Estate (259)	450.59	Certified	N/A	15-Feb-13					

	Papua New Guinea	Smallholders - West Gurney Estate (231)	479.13	Certified	N/A	15-Feb-13					
	Papua New Guinea	Smallholders - East Sagarai Estate (156)	283.93	Certified	N/A	15-Feb-13					
	Papua New Guinea	Smallholders - West Sagarai Estate (212)	345.96	Certified	N/A	15-Feb-13					
Poliamba (POL)	Papua New Guinea	Poliamba Oil Mill	10,720.53	Certified	N/A	19-Mar-12					

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	Papua New Guinea	Kara Estate	1,032.10	Certified	N/A	19-Mar-12					
	Papua New Guinea	Nalik Estate	2,666.75	Certified	N/A	19-Mar-12					
	Papua New Guinea	West Coast Estate	627.60	Certified	N/A	19-Mar-12					
	Papua New Guinea	Noatsi Estate	2,064.10	Certified	N/A	19-Mar-12					
	Papua New Guinea	Madak Estate	1,517.11	Certified	N/A	19-Mar-12					
	Papua New Guinea	Smallholders -North Division (615)	1,022.12	Certified	N/A	19-Mar-12					
	Papua New Guinea	Smallholders- South Division (866)	1,257.21	Certified	N/A	19-Mar-12					
	Papua New Guinea	Smallholders -West Division (309)	533.54	Certified	N/A	19-Mar-12					
Ramu Agricultural Industries Ltd (RAIL)	Papua New Guinea	Gusap Mill	14,606.08	Certified	N/A	5-Aug-10					
	Papua New Guinea	Gusap East (Gusap) Estate	2,856.45	Certified	N/A	5-Aug-10					
	Papua New Guinea	Gusap West (Paddock) Estate	3,019.09	Certified	N/A	5-Aug-10					
	Papua New Guinea	Surinam Estate	2,154.14	Certified	N/A	5-Aug-10					

	Papua New Guinea	Dumpu Estate	2,254.36	Certified	N/A	5-Aug-10					
	Papua New Guinea	Ngaru Estate	854.33	Certified	N/A	5-Aug-10					

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	Papua New Guinea	J Estate (Jephcott) Estate	2,824.01	Certified	N/A	5-Aug-10					
	Papua New Guinea	Smallholders - Madang VOPs (71)	360.00	Certified	N/A	5-Aug-10					
	Papua New Guinea	Smallholders - Morobe VOPs (253)	283.70	Certified	N/A	5-Aug-10					
Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill		Certified	N/A	1-Feb-13					
	Papua New Guinea	Mamba Oil Mill		Certified	N/A	1-Feb-13					
	Papua New Guinea	Embi Estate	1,737.78	Certified	N/A	1-Feb-13					
	Papua New Guinea	Ambogo Estate	2,040.00	Certified	N/A	1-Feb-13					
	Papua New Guinea	Sangara Estate	1,780.00	Certified	N/A	1-Feb-13					
	Papua New Guinea	Sumbiripa Estate	2,545.00	Certified	N/A	1-Feb-13					
	Papua New Guinea	Mamba Estate	4,013.10	Certified	N/A	1-Feb-13					
	Papua New Guinea	Sambogo Estate	2,637.85	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	N/A	1-Feb-13					

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	Papua New Guinea	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	N/A	1-Feb-13					
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Kumbango Oil Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Kapiura Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Numundo Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Waraston Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Bebere Estate	2,226.71	Certified	N/A	10-Sep-08					
	Papua New Guinea	Kumbango Estate	2,610.80	Certified	N/A	10-Sep-08					
	Papua New Guinea	Togulo Estate	1,509.20	Certified	N/A	10-Sep-08					
	Papua New Guinea	Dami Estate	1,507.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Waisisi Estate	1,090.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Kautu Estate	4,280.60	Certified	N/A	10-Sep-08					
	Papua New Guinea	Karaus Estate	2,387.64	Certified	N/A	10-Sep-08					

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	Papua New Guinea	Morua Estate	848.16	Certified	N/A	10-Sep-08					
	Papua New Guinea	Bilomi Estate	2,011.70	Certified	N/A	10-Sep-08					

	Papua New Guinea	Loata Estate	562.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Haella Estate	4,220.30	Certified	N/A	10-Sep-08					
	Papua New Guinea	Garu Estate	3,709.60	Certified	N/A	10-Sep-08					
	Papua New Guinea	Daliavu Estate	2,484.10	Certified	N/A	10-Sep-08					
	Papua New Guinea	Sapuri Estate	2,180.90	Certified	N/A	10-Sep-08					
	Papua New Guinea	Malilimi Estate	3,837.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Rigula Estate	3,720.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Nomundo Estate	2,645.17	Certified	N/A	10-Sep-08					
	Papua New Guinea	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	N/A	10-Sep-08					
	Papua New Guinea	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	N/A	10-Sep-08					
	Papua New Guinea	Lolokoru Estate	2,453.10	Certified	N/A	10-Sep-08					
	Papua New Guinea	Ove Estate	3,541.00	Certified	N/A	10-Sep-08					

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	Papua New Guinea	Tamare Estate	1,362.70	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders LSS Mosa (1822)	5,008.53	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders VOP East (1817)	5,324.37	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders VOP Central (1964)	5,756.57	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders VOP West (1279)	2,804.10	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders LSS Kapiura (551)	551.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders VOP Kapiura (850)	847.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20)	700.37	Certified	N/A	10-Sep-08					
Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	N/A	27-Mar-20				There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.	

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	Papua New Guinea	Munum Estate	1,734.57	Certified	N/A	27-Mar-20					
	Papua New Guinea	Maralumi Estate	2,427.15	Certified	N/A	27-Mar-20					
	Papua New Guinea	Erap Estate	1,237.68	Certified	N/A	27-Mar-20					

3.3 Details of Nonconformities

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

During this Assessment there were two (2) Critical; one (1) Minor nonconformities and zero (0) Opportunity For Improvement raised. The Strategic Operating Unit (SOU 20) - Chaah Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2538469-202408-M1	Issued Date	22/08/2024
Due Date	20/11/2024	Closure Date	28/10/2024
Indicator & Category (Critical / Minor)	3.6.2 – Critical		
Statement of Nonconformity:	The implementation of Health & Safety risk monitoring has not been effectively demonstrated.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	It was observed that a backhoe operated by a contractor was being used at the FFB ramp station. Upon further inspection and an interview with the operator, it was confirmed that the backhoe had a faulty reverse sensor and a broken horn. Awareness on the operator for reporting any malfunctioning safety devices was not evident. Further investigation revealed that the Pre-start Checklist before starting daily operations via the e-SIME+ system was not able to detect any faulty parts to address the issue before commencing work. According to clause 5: Procedures and Overview of the e-SIME+ System, any potential to cause harm or injury must be reported via the system. However, the mill failed to detect the faults in the backhoe as required and no Stop Work Order (SWO) initiated.		
Corrections:	i) Stop work order has been issued to the contractor immediately. ii) The faulty reverse sensor and broken horn has been repaired. iii) Reminder letter to be issued to the contractor for operating unsafe machinery at mill.		
Root Cause Analysis:	The contractor's driver was not trained to check and record the condition of the backhoe prior of work as the implementation of pre-start checklist & ESIME+ only conducted for mill's machineries has caused the faulty reverse sensor and horn not being identified.		
Corrective Actions:	i) Mill to identify all contractors working with heavy machine inside mill area and conduct awareness training to all these identified contractor including the machine operator on checking of the machine condition including safety devices prior of work. ii) The briefing will include awareness of ESIME+ reporting. Any unsafe act or condition observe inside the mill compound can be reported by the contractor to the mill to be further logged in the ESIME+ system.		

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	<p>iii) Mill to appoint mill supervisor for monitoring of contractor with heavy machine in ensuring the operator to check their machine condition prior of work using prestart checklist. The prestart checklist then will be reviewed by the mill supervisor and verified by mill management representative.</p> <p>NC close out verification:</p> <p>i) Stop work order (SWO) notice was issued on 20/08/2024 by mill's OSH Coordinator, acknowledged by the contractor, Perniagaan Khidmat Setia on the same day. Related hazard and potential hazard to life has been mitigated together with any other potential occurrence and the SWO closed/completed on 21/08/2024 by mill manager.</p> <p>ii) The faulty reverse sensor and horn has been repaired as verified with the demonstration of the JCB operation.</p> <p>iii) Reminder letter was issued on 21/08/2024 to the contractor, Perniagaan Khidmat Setia to ensure the equipment/vehicle in good and safe condition while in operation. Failure to do so will lead to further suspension and termination of the service contract.</p> <p>iv) As in October 2024, only one (1) long term contract (JCB contract PO# 4300690908). Related safety training/briefing was carried out to the contractor for vehicle inspection checklist/e-sime+ on 26/08/24.</p> <p>v) Briefing on the awareness of ESIME+ reporting was carried out on 14/10/2024 to the mill operators. From the interview session with mill's operator (process and maintenance team), they are able to explain the e-sime+ and how to report via QR code if there is any unsafe act & condition/dangerous occurrence. E-sime+ also can be used as part of internal communication to report any machinery/equipment failure/breakdown together with defect book. Evidence of e-sime+ report for October 2024 was verified as most of the issues have been closed and some pending for closure.</p> <p>vi) Appointment of mill supervisor for monitoring of contractor was verified through letter of appointment dated 24/08/2024. Pre-start check is mandatory prior to operation and recorded in the vehicle inspection checklist, checked by the driver, review by supervisor and verified by engineer/manager. Sample of inspection records in 3rd week of October 2024 and summary of pre-start for October 2024 to date was verified.</p>
Assessment Conclusion:	Implemented action was found to be sufficient to close the NC effectively on 28/10/2024. Continuous implementation will be further verified in the next assessment

Non-conformity			
NCR Ref #	2538469-202408-M2	Issued Date	22/08/2024
Due Date	20/11/2024	Closure Date	28/10/2024
Indicator & Category (Critical / Minor)	3.8.9(i) – Critical		
Statement of Nonconformity:	Process to ensure the independent third parties transporter complies with complies with relevant requirements of this RSPO Supply Chain Certification was not effectively demonstrated.		
Requirement Reference:	Outsourcing Activities		

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	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
Objective Evidence:	Based on information given from the mill personnel, SDO (KCP) will arrange the transport for despatch. Based on the LOA, SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad), group procurement has issued a contract/LOA with transporter (Sxx Mxxx) and found to be expired on 31st March 2024, refer to contract dated 26/7/2021, ref: T/H_SDPB/0721/001. A valid legal contract/LOA was not able to be verified at the point of assessment.
Corrections:	Mill Management has obtained the letter extension of contract for STB Maju which the contract extended until 31st March 2025.
Root Cause Analysis:	Mill does not engage directly with the transporter STB Maju as kernel transportation arrangement has been made by the SDGI KCP Therefore, mill management has not identified kernel transporter as outsource activity at mill and not monitor expiry of its contract/LOA.
Corrective Actions:	<p>Mill to include kernel transporter in the mill's list of outsource activity and monitor the contract/LOA expiry.</p> <p>NC close out verification:</p> <p>i) Verified the appointment of transportation, warehousing, and handling services between SD Guthrie International Carey Island KCP Sdn Bhd (Company) and S.T.B Maju (Malaysia) Sdn Bhd (Service Provider), ref. no.: KCP/EXT/01/2024 dated 15/08/2024. The contract is valid for 12 month(s) from 1/04/2024 to 31/03/2025.</p> <p>ii) List of stakeholder dated September 2024 has included the said transporter, S.T.B Maju (Malaysia) Sdn Bhd and validity of contract for monitoring purpose.</p>
Assessment Conclusion:	Implemented action was found to be sufficient to close the NC effectively on 28/10/2024. Continuous implementation will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2538469-202408-N1	Issued Date	22/08/2024
Due Date	Next Assessment Visit	Closure Date	"Open"
Indicator & Category (Critical / Minor)	2.1.3 – Minor		
Statement of Nonconformity:	Demarcation of legal or authorised boundaries was not visibly maintained.		
Requirement Reference:	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.		
Objective Evidence:	Sg Simpang Kiri Estate Based on site observation at HCV 4 (bund, field P04) estate boundary near smallholders (Sayung Mas), there was no boundary marking visibly maintained along the boundary area/trenches. The other area with no boundary stone has yet to be identified and re-demarcated as to ascertain the legal limit		

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	within estate boundary. Normative reference: Sime Darby Plantation EQMS, Section B7, Boundaries issue:1 dated 1/11/2008, clause 7.2 – Estate boundaries must be marked with iron pipes, planted along boundary lines and painted with red/white alternate rings
Corrections:	Estate will identify the boundary stone or boundary limit at the area and to re-demarcate the boundary area with pipe painted with red/white rings
Root Cause Analysis:	Current monitoring of boundary area by the Auxiliary Police (AP) does not include checking of boundary stone or marking condition. No specific monitoring form provided for the AP to include checking of condition or availability of boundary stone/markings has led the boundary marking not being maintained.
Corrective Actions:	1. Estate management will record the coordinate of the boundary stone or marking in the estate boundary map. 2. Estate management will provide boundary monitoring form that include checking of boundary stone/markings condition to the PIC which to be conducted on half yearly basis.
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good cooperation given by the SOU20 management team and GSD team from HQ

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2380413-202308-M1	Issued Date	17/08/2023
Due Date	15/11/2023	Closure Date	23/10/2023
Indicator & Category (Critical / Minor)	6.7.3 – Critical		
Statement of Nonconformity:	The complete implementation of personal protective equipment (PPE) usage was not fully executed.		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		

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Objective Evidence:	During site visit at Sg Simpang Kiri Estate, the evidence found as below: 1. Harvesting Area Field P05C, found 1 harvester was not bringing and wearing their Safety goggles. It was not in line with Safe Work Procedure Oil Palm Plantation Operation Version 01/2021 dated 13/12/2021 "Wear Complete PPE, Safety helmet, Goggles, Gloves and Shoes). 2. Replanting Area Field P23A, found Tractor Driver was not wearing safety shoes (use normal high cut rubber shoes). It was not in line with PPE Matrix: Required PPE Long Sleeve Shirt, Long Trousers, Safety Helmet and Safety Shoes. 3. Replanting area Field P23A, found 4 workers who distributed ERP and Palm Trees for replanting work was not equipped with Mask, and Nitrile gloves when handling Fertilizer RP. It was not in line with Safe Work Procedure Oil Palm Plantation Operation Version 01/2021 dated 13/12/2021 "Wear Complete PPE". It also mentioned in CHRA Recommendation Section 5.1.4: Use of Approved Personal Protective Equipment (USECHH 2000 Regulation 16) Field Manuring Mandor & General "N95 respirator mask, nitrile gloves, safety helmet, wellington boots and apron.*Safety glasses will be provide for dustiness fertilizer".
Corrections:	1. Safety glasses for the said harvester have been replaced immediately. 2. Estate management has instructed all tractor drivers to wear safety shoes. 3. Mask and nitrile glove has been distributed to the 4 workers at replanting area immediately on the same day.
Root Cause Analysis:	1. Mandore's responsibility to do daily checking on the PPE was not clearly communicated by the Assistant Manager that led to lack of supervision in activity ensuring workers put their PPE during working hour. 2. Lack of enforcement and supervision by Management (staff and assistant manager in charge) and monitoring on the requirement of PPE during the work activity (harvesting, tractor driving and replanting).
Corrective Actions:	1. All mandores will be briefed on their responsibility to ensure that workers wear PPE all the time. 2. Training will be conducted on the PPE requirement for all workforce to ensure full compliance. 3. Enforce immediate stop work and rectification for non-compliances to PPE following IOM dated 20 July 2023 by Chief Executive Officer, Upstream Malaysia on Outcome of ASI- RSPO: RSPO P&C Compliance Assessment and RSPO & MSPO Audits for year 2023 on Health, Safety, Environment Matters in Upstream Malaysia. 4. Enforcement of e-SIME+ System as platform for any non-conforming practices reporting for further action.
Assessment Conclusion:	Site Visit for selective spraying activity at P06, harvesting activity at P06A and slashing activity at P04 confirmed that all workers wore appropriate PPE as recommended by CHRA report and PPE matrix. Refer to PPE issuance record, workers received PPE based on their condition of current PPE before provided with new one. Details such as name, date of received, and type of PPE provided were recorded. Based on interview session with mandores, sprayers and harvesters, enforcement of PPE was reminded every day during rollcall and monitored by management as per Inter Office Mail (IOM) dated 20/07/2023 undersigned CEO with reference number CEOUM/HSE/009/07/2023 that mentioned on Enforce immediate stop work and rectification for non-compliances to PPE. Estate consistently provide training related to safety and PPE enforcement such as PPE Training & 10 Safety Golden Rules, dated 01/06/2024 and Refresher Training

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	for PPE Usage, Chemical Handling, Scheduled Waste Management, and Safety Data Sheet Availability, dated 15/07/2024 in addition to training provided in 2023. Trainings were attended by workers including mandores, clerks and staffs. Evidence of training such as attendance, training material and documents of evaluation prior to training were available for review.
Effectiveness Closure (for previous audit closed Critical NC):	No recurrence of issue observed thus the previous NC is remain closed.

Previous Audit Minor Non-conformity			
NCR Ref #	2380413-202308-N1	Issued Date	17/08/2023
Due Date	22/08/2024	Closure Date	22/08/2024
Indicator & Category (Critical / Minor)	3.3.2 – Minor		
Statement of Nonconformity:	Procedures for chemical safety management (Relabelled of chemical container & SDS availability) was not consistently implemented.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>During site visit at Chaah POM and Sg Simpang Kiri Estate, it was found that 1 unit of bottle contained with Steering Oil were store in the container without any labelled respectively. It was not in line with procedures Chemical Safety Management UM/HSE/OCP/04 dated March 2021 Section 6.5.1 Handling of chemicals shall be done based on the recommendation in Safety data Sheet or any other relevant internal SOP.</p> <p>During site visit at Chaah estate, Field 01A, Spraying activities, there are 3 chemicals used which is Sodium Chloride, Canyon and Wet & Stick. Checking with mandore found no evidence of SDS for Sodium Chloride and Wet Stick was available at spraying area. It was not in line with procedures Chemical Safety Management UM/HSE/OCP/04 dated March 2021 Section 6.5 Handling of chemicals and CHRA Recommendation stated "SDS was displayed at chemical storage area or at location where chemical used".</p>		
Corrections:	<p><u>Sg Simpang Kiri Estate</u> The bottle has been replaced with proper container and labelled accordingly.</p> <p><u>Chaah POM</u> Mill has instructed the said worker to remove the bottle of steering oil immediately since it was for his own use and reminded him to keep any lubricant oil at proper storage area and proper container with label.</p> <p><u>Chaah Estate</u> SDS for all chemicals has been immediately provided to the mandore. Briefing on the SDS and its function has been conducted to the said mandore on the next day.</p>		
Root Cause Analysis:	1. Ineffective briefing to workers on chemical labelling on secondary storage/container which led to workers being unaware of the requirement and subsequently stored oil in a container without proper labelling.		

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	2. Lack of monitoring and supervision by the management (staff and assistant manager in charge) on the implementation of chemical management requirement (storage of chemical/lubricant/oil and SDS requirement).
Corrective Actions:	<p>1. Estates and mill will conduct refresher training on chemical safety management as well as SDS requirement with the guidance from RSQM to the staff in charge, mandore and all related workers (related work with chemical/lubricant/oil) with proper training evaluation conducted to ensure adequate understanding on the subject matter.</p> <p>2. Estates and mill will conduct regular spot check at the Estate and Mill compound to ensure no improper storage of chemical/lubricant/oil and SDS is available at all workplaces on monthly basis. This will also be covered during the weekly housing inspection. Workers to be briefed and encouraged to use e-SIME+ System as platform for any non-conforming practices reporting for further action.</p>
Assessment Conclusion:	<p>Documents review at Chaah POM and Sungai Simpang Kiri Estate affirmed that training on chemical handling and labelling of chemicals containers were conducted on 13/05/2024 and 15/07/2024 simultaneously. Training materials, attendance of workers and evaluation of training also available for review. Additionally, based on minutes of Monday rollcall at Chaah POM also indicated that management regularly reminded of their workers on concerns such as chemical labelling on secondary storage/container especially for stations such as workshop, and laboratory.</p> <p>Regular Workplace Inspection at both estate and mill also confirmed that management seriously monitored any incompliance occurrence regards on chemical handling and labelling at high-risk location such as chemical premix area, chemical activity, machineries, workshop, and laboratory.</p> <p>Based on interview with mandores (Sungai Simpang Kiri Estate) and Station Supervisor (Chaah POM), they claimed that they were aware and understood requirement of chemical and container labelling as per legal regulation.</p> <p>As per verification visit at P19A at Chaah Estate, it was observed spraying activity was conducted using Glyphosate and Metsulfuron Methyl. SDS for both chemicals were available for review, and this conform the implementation of procedures Chemical Safety Management UM/HSE/OCP/04 dated March 2021 Section 6.5 Handling of chemicals and CHRA Recommendation stated "SDS was displayed at chemical storage area or at location where chemical used". Interview with mandores also confirmed that they have been provided with regular training such as Training on Chemical Handling and Store Management regarding SOP and Cleanliness, dated 17/07/2024 and Refresher Briefing on PPE Compliance, SOP Spraying and Manuring, dated 17/05/2024.</p>
Effectiveness Closure (for previous audit closed Critical NC):	Implemented action was found to be effective, thus the previous minor NC was closed on 22/08/2024. Continuous implementation will be further verified in the next assessment.

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: 2380413-202308-I1</p> <p>Indicator: 6.2.4</p>

	<p>The maintenance and legibility of records related to implementation of Housing Complex/NEST/Community Hall Weekly Inspections (PIOA) could be enhance further.</p> <p>Verification / Follow-up actions:</p> <p>Based on the review of the records maintained by each operating unit of the UoC, it was observed that the maintenance and legibility of records related to the implementation of Housing Complex/NEST/Community Hall Weekly Inspections (PIOA) have shown improvement. The records are now more organized and easier to read, which facilitates better tracking and verification of inspection activities.</p>
OFI 2	<p>OFI Statement:</p> <p>2380413-202308-I2</p> <p><u>Indicator : 7.1.1</u></p> <p>The planting intensity of beneficial plant in all 3 estates within SOU 20 could be enhance further.</p> <p>Verification / Follow-up actions:</p> <p>During documents review and site visit, it was confirmed that all 3 estates has increased beneficial plants density in their estates. IPM management plan was available where estates plan to planting beneficial plants at main roads and it can be observed during site visit. Each point of beneficial plant consists of ratio for <i>turnera subulata</i> (30%), <i>cassia cobanensis</i> (30%) and <i>antigonon leptopus</i> (40%).</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1944861-202008-M1	Critical	6.2.2	14/08/2020	Closed on 05/11/2020
1944861-202008-M2	Critical	3.6.1	14/08/2020	Closed on 05/11/2020
1944861-202008-M3	Critical	3.8.4	14/08/2020	Closed on 05/11/2020
1944861-202008-M4	Critical	3.2.1	14/08/2020	Closed on 05/11/2020
2095494-202108-N1	Minor	2.2.2	24/08/2021	Closed on 25/08/2022
2095494-202108-N2	Minor	7.3.1	24/08/2021	Closed on 25/08/2022
2155450-202201-N1	Minor	2.2.2	21/01/2022	Upgraded into Major
2155450-202201-N2	Minor	3.4.2	21/01/2022	Closed on 25/08/2022
2155450-202201-N3	Minor	4.2.2	21/01/2022	Closed on 25/08/2022
2240882-202208-M1	Critical	2.2.2	25/08/2022	Closed on 26/10/2022
2240882-202208-N1	Minor	6.2.5	25/08/2022	Closed on 17/08/2023
2240882-202208-N2	Minor	7.3.2	25/08/2022	Closed on 17/08/2023
2380413-202308-M1	Major	6.7.3	17/08/2023	Closed on 23/10/2023
2380413-202308-N1	Minor	3.3.2	17/08/2023	Closed on 22/08/2024
2538469-202408-M1	Critical	3.6.2	22/08/2024	Closed on 28/10/2024
2538469-202408-M2	Critical	3.8.9(i)	22/08/2024	Closed on 28/10/2024

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2538469-202408-N1	Minor	2.1.3	22/08/2024	"Open"
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3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Strategic Operating Unit (SOU 20) - Chaah Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Union	NUPW representative	face to face interview
Internal	Gender committee	face to face interview
Contractor	Pxxxxxxx Kxxxxx Sxxxx – FFB Transporter	face to face interview
Contractor	Hxxxxx Exxxxxxxxx – Replanting contractor	face to face interview
Contractor	Rxxxxx Axxxx – grass cutting works contractor	face to face interview
Governmental Department	Sxx Kxx Dxxx Txxx Jxxxx	face to face interview
Governmental Department	Sxx Kxx Sxx Lxxxx	face to face interview
Communities	Penghulu Mukim Cxxxx Bxxx	face to face interview
Communities	Gxx Hx Hxx – smallholder	face to face interview

Stakeholders comment	
1	<p>Feedback: Teacher (Sxx Kxx Dxxx Txxx Jxxxx)</p> <p>He has been a teacher at Sk. Dxxa Berxxxu Jxxxh for almost two years now. According to him, there are around 100 estate's students at the school and the estate has a good relationship where the estate has contributed the manpower for post flood that was occurred recently. The parents that work in the estate has also helps in contributing for those activity. He also stated that they also had the Ziarah Cakna Program</p>

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	<p>where the teachers will be visiting the student at the student's house if there is long period of absence of students or any concern raised. There is no estate's activity that affecting the school.</p> <p>Audit Team verification and response: Management Responses: Will keep maintaining the good practise and will improve further in giving support to all stakeholders.</p> <p>Audit Team Findings: No further issue</p>
2	<p>Feedback: Smallholder</p> <p>There is clear boundary (bunds) that was maintained by the estate. The smallholder was allowed to use the estate's road and was charged with toll per entry. There is no issued raised between the smallholder and the estate.</p> <p>Audit Team verification and response: Management Responses: Will keep maintaining the good practise and will improve further in giving support to all stakeholders.</p> <p>Audit Team Findings: No further issue</p>
3	<p>Issue: Gender Committee Representative, worker representative, NUPW representative</p> <p>During the stakeholder meeting, it was informed by the representative that there is no harassment has happened in the estate premise. Any issues or complaint received will be discuss in gender committee meeting without prejudice. Regular meetings between the estate management and NUPW committee are conducted to address any matter arising from the workers. Worker's welfare including housing, salary payment and benefit are well taken care of by the estate management.</p> <p>Audit Team verification and response: Management Responses: Will keep the good practise, all workers are asset to the company, and they will be taken care.</p> <p>Audit Team Findings: No further issue</p>
4	<p>Feedback: Contractor (Pxxxxxxxx Kxxxxxx Sxxxx, Hxxxxx Exxxxxxxxx, Rxxxxx Axxxx)</p> <p>Interview with the representative, the estate management and the contractor have a very good relationship between both parties. According to the contractor, tendering and payment process was made by the HQ. The contractor was given PTW (permit to work) every week before starting their works at the estate or the mill. The estate has also given briefing to the contractor before starting their services in the estate. The contractor has also provided PPE and conducted the NRA to their workers as per requirement from the estate management.</p> <p>Audit Team verification and response: Management Responses: No further issue</p> <p>Audit Team Findings: No further issue</p>

5	Feedback: Government Department Sxx Kxx Sxx Lxxxx - no comment from the representative need to be follow-up by the audit team and need to be address by the management as based on the interview conducted, the representative mentioned the relationship between them are good and no issue raised by the stakeholder
	Audit Team verification and response: Management Responses: No further issue Audit Team Findings: No further issue
6	Feedback: Communities Penghulu Mukim Cxxxx Bxxx - no comment from the representative need to be follow-up by the audit team and need to be address by the management as based on the interview conducted, the representative mentioned the relationship between them are good and no issue raised by the stakeholder
	Audit Team verification and response: Management Responses: No further issue Audit Team Findings: 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 the estates have undergone 1 st cycle of replanting.					

Previous land owner / user comment	
N/A	Feedbacks: Not Applicable as the estates have undergone 1 st cycle of replanting. Audit Team verification and response:



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 Strategic Operating Unit (SOU 20) - Chaah Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Strategic Operating Unit (SOU 20) - Chaah Palm Oil Mill is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: Shylaja Devi Vasudevan Nair
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: SD Guthrie Berhad
Title: Lead Auditor	Title: Head Sustainability Compliance Unit, GSD
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: 28th October 2024	Date: 05/11/2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	<p>Based on the Estate Quality Management System (EQMS), Sub-Section 5.5 Management Responsibility, Appendix 5.5.3.2 Procedure for External Communication (Version 1, Issue date: 1/1/2008), the following documents for the mill and all estates within SOU 20 UoC are available as per the sample:</p> <ul style="list-style-type: none"> • Land titles/user rights • Occupational health and safety plans • Plans and impact assessments relating to environmental and social impacts • High Conservation Value (HCV) documentation • Pollution prevention and reduction plans • Details of complaints and grievances • Continuous improvement plans • Public summary of certification assessment report • Group Sustainability Policy • Record of CSR programs and contributions to local communities <p>Additionally, policies and procedures are displayed at office notice boards, workstations, and worker quarters.</p>	Complied

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		<p>Furthermore, the annual sustainability report, sustainability policies, Human Rights Charter documents, company statements, and global documents are published on the company's website (https://www.sdguthrie.com/). This website is accessible to the public.</p> <p>For CSR-related activities, information on social programs related to education, environment, community, and health is available. Yayasan Sime Darby, as the Foundation, has expanded its initiatives from offering scholarships to deserving individuals to funding impactful conservation, outreach, and development programs. These events are published on the Yayasan Sime Darby website (https://www.yayasansimedarby.com/).</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>As a group of companies, SD Guthrie Berhad has established a robust communication system to disseminate public information related to sustainability policies and statements via the website (https://www.sdguthrie.com/sustainability/reports-policies-and-statements/).</p> <p>Information is available in appropriate languages and is accessible to relevant stakeholders (both internal and external). This information is provided through stakeholder meetings and social dialogues, which are conducted at each specific operating unit. These meetings are facilitated by representatives from each operating unit in Malay, ensuring comprehension by the relevant stakeholders.</p> <p>This has been verified through interviews with sampled stakeholders conducted during the audit. Stakeholders confirmed their awareness of the availability of operating unit information and their ability to access it from the office. In addition to gathering feedback and discussing the progress of previous feedback, stakeholders were also provided with information on company</p>	Complied

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		<p>policies, the grievance mechanism, SOPs related to stakeholder requests, the code of business conduct, and the whistleblowing policy. Furthermore, information in both English and Malay is displayed in strategic areas within the estate and mill compounds. The latest stakeholder meetings and social dialogues conducted at each operating unit are as follows:</p> <p><u>Stakeholder Meetings:</u></p> <ul style="list-style-type: none"> • Chaah POM, Chaah Estate & Sg. Simpang Kiri Estate: Stakeholders Consultation Meeting conducted on 17/01/2024 at Chaah Estate Community Hall. The meeting was attended by operating unit managers, assistant managers, and external stakeholders, including local authorities, neighbouring village heads, smallholders/cattle owners, school representatives, and vendors. No negative feedback was received from stakeholders during the meeting. • North Labis Estate: A separate stakeholders consultation meeting was conducted on 26/04/2024. <p><u>Social Dialogues:</u></p> <p>Social Dialogue conducted as per Guidance for Workers Representative Social Dialogue; Ref. # SD Guidance 2/2023_July-SWS. Latest conducted as below:</p> <ul style="list-style-type: none"> • Chaah POM: 25/07/2024 • Chaah Estate: 22/07/2024 • Sungai Simpang Kiri Estate: 24/07/2024 • North Labis Estate: 18/07/2024 	
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1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed a Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, Version 1 dated 01/04/2008, to establish a system for effective communication with external interested parties regarding the performance of the estate. Procedures related to internal stakeholders are documented in the Sustainable Plantation Management System, Appendix 5, Version 1 dated 01/11/2008, under the section Flowchart and Procedures on Handling Internal Issues.</p> <p>The timeframe for internal and external communication is set to provide feedback within two weeks from the date of receipt for communications requiring direct feedback, and within one week of the completion of the investigation for communications requiring investigation.</p> <p>All operating units under SOU 20 UoC have demonstrated that records of requests for information and responses are maintained.</p> <p>Examples include:</p> <p><u>Chaah POM:</u></p> <ul style="list-style-type: none"> In January 2024, MPOB emailed the mill requesting an update on the Penyata eCost 2024 for the financial year from January to December 2023. The mill management responded to the request on 22/02/2024, which MPOB acknowledged on the same day. <p><u>Chaah Estate:</u></p> <ul style="list-style-type: none"> On 18/11/2023, the Head of Kxxxxxx Hxxx Kxxxxxx sent an official letter (Ref. NO. (01)dIm.KKP/MK17/SS/11-23) requesting donations for a thanksgiving event in conjunction 	Complied
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		<p>with inaugurating a new road. On 06/12/2023, the management approved a cash contribution for this purpose.</p> <ul style="list-style-type: none"> • The Parent Teacher Association of SMK Sxxx Bxxx sent an official letter (Ref. No. JEA7043.31/100-23/2/14) on 05/01/2024 requesting a donation to upgrade the Surau Lukman Al-Hakim facilities of SMK Sxxx Bxxx. On 22/01/2024, the management approved a cash contribution for this purpose. • On 15/07/2024, the Batu Pahat District Health Office requested the estate to allow the use of the Community Hall for malaria and filariasis screening on 22-23/07/2024. The estate was also asked to inform all workers to undergo screening. The program was successfully conducted, and all employees were screened. <p><u>Sungai Simpang Kiri Estate:</u></p> <ul style="list-style-type: none"> • On 29/01/2024, an officer from the Batu Pahat Labour Office emailed the estate to complete the Estate Profile and employee employment information. The estate management provided the necessary information by email on 26/02/2024. • The Johor Occupational Safety and Health Department sent an official letter (Ref. No. JKKP.J.600-7/1/1Vol2(24)) dated 03/04/2024, informing about the OSH Act 1994 Compliance Audit. On 25/06/2024, the Johor JKKP conducted the audit and documented the results in an official letter (Ref. No. JKKP.J.600-7/1/1Vol.3(30)) dated 25/06/2024. <p><u>North Labis Estate:</u></p> <ul style="list-style-type: none"> • On 08/05/2024, Sxx Mxxx Mxxxxxxx Temple sent an official letter to the Estate Manager requesting permission to use the estate road for worship from 08/09/2024 to 08/11/2024. The Estate Manager approved the application in writing. • The North Labis Farm Indian Community Association applied to use the field and multi-purpose hall for a program for police 	
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		<p>assistance and special children through an official letter dated 04/06/2024. The Estate Manager approved the application in writing.</p> <ul style="list-style-type: none">• SJK (T) Lxxxx requested to use the estate area for hiking activities in conjunction with the school camp through an official letter (Ref. No. JBD7061/600/3/6/7) dated 20/05/2024. The Estate Manager approved the application in writing. <p>The management communicated this information to relevant stakeholders during stakeholder meetings. The latest stakeholder meetings conducted at the visited operating units are as follows:</p> <ul style="list-style-type: none">• Chaah POM, Chaah Estate & Sg. Simpang Kiri Estate: Stakeholders Consultation Meeting conducted on 17/01/2024 at Chaah Estate Community Hall. The meeting was attended by operating unit managers, assistant managers, and external stakeholders, including local authorities, neighbouring village heads, smallholders/cattle owners, school representatives, and vendors. No negative feedback was received from stakeholders during the meeting.• North Labis Estate: A separate stakeholders consultation meeting was conducted on 26/04/2024. <p>In addition, the management has established a mechanism as per the Standard Operating Manual (SOM) mentioned above for relevant stakeholders to request estate and mill information. Should there be any requests for information specified in the RSPO P&C from any stakeholders, records of requests can be maintained in various ways, such as a Communication Logbook and filing of correspondence documents (e.g., email printouts and letters).</p>	
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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>SD Guthrie Berhad has established an Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, Procedure for External Communication, Version 1, issued on 01/11/2008. This procedure details the process for handling complaints from stakeholders and the timeframe for addressing external communications. Feedback is provided within two weeks of receipt for direct communications and within one week of completing investigations.</p> <p>In addition to this procedure, the Grievance Response Standard Operating Procedure, Version 2 dated 18/07/2022, has been established to handle specific grievance issues for both internal and external stakeholders.</p> <p>All the above procedures have been communicated to relevant stakeholders at each operating unit during stakeholder meetings. The latest stakeholder consultation meetings were conducted by the respective operating units, with attendees including smallholders, local communities, government agencies, contractors, and representatives from nearby schools. Feedback was recorded in the minutes of the meetings. The implementation of these procedures can be verified through consultations and communications held with internal and external stakeholders, as well as recorded responses to stakeholder requests. This procedure was also implemented during stakeholder meetings, where questions from stakeholders were duly answered.</p> <p>Regular morning briefings are used by management to communicate policies, procedures, rules, regulations, and other information to workers. External communications are mainly conducted through letters and forms, which are properly maintained by the management of each operating unit.</p>	Complied
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		Additionally, each operating unit has appointed a person responsible for handling social issues to ensure the effective implementation of the procedures. Based on interviews with the respective managers of each operating unit, they have overall responsibility for handling any issues related to social matters. They appoint one of their assistants as persons-in-charge for handling these issues. This is evidenced by the appointment letters outlining the responsibilities for handling social matters. Interviews confirmed that these individuals are aware of their responsibilities.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	<p>The list of stakeholders for internal and external parties has been maintained up to date as of July 2024 at each visited operating unit. The stakeholder list includes various categories such as government/statutory bodies, embassies, contractors, local communities, service providers, and suppliers. The list contains information on the name of stakeholders, contact names, addresses, and contact numbers.</p> <p>During the audit, it was verified that the stakeholder lists have been duly updated. Telephone calls made to randomly sampled stakeholders confirmed the accuracy and currency of the information.</p>	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	SD Guthrie Berhad (formerly known as Sime Darby Plantation 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. In the Code of Business Conduct (COBC), dated 02/2023, it mentions on core values and the way that the SD Guthrie Berhad conduct the business. The business principles applied are as follows:	Complied

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	<ul style="list-style-type: none">• Health, Safety and Environment• Compliance• Working with Local Communities• Fair Business Practices <p>Section 7 of the COBC states that ethics and management practices should be align with standard of ethical behaviour such as avoiding conflicts of interest, guarding against bribery and corruption, no gift policy and prohibits any form or usage of corporate hospitality to influence business decision, donations and sponsorship, protecting group assets, accuracy of records of business transactions and financial information, proprietary and confidential information, personal data protection and competition and antitrust laws.</p> <p>SD Guthrie 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. Samples of VIP document signed are as follows:</p> <ul style="list-style-type: none">• Rxxxxxx Axxxx Axxx Txxxxxx: Grasscutting works contractor – contracted for 12 months period (November 2023 – October 2024)• Hxxxxx Exxxxxxxxx: Land Preparation and Related works for Oil Palm Replanting• Pxxxxxxxx Kxxxxxx Sxxxx: FFB Transporter – Letter of Extension dated 20 March 2024, expired on 31/12/2024• Qxxxxxx Sxxxxxx: Land Preparation and Related works for Oil Palm Replanting• Pxxxxxx Exxx: Construction & Completion of Surau, contracted for 24 weeks (until 01/02/2024)	
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		<ul style="list-style-type: none"> Rxxxxxxx Sxxxx: FFB Transporter – valid until 31/12/2024 Axxxxxxx: School Children Transporter – valid until 30 April 2025 	
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 involves regular check of contractors' legal compliance and employees' welfare by the management. A Contractor and Vendor Checklist was developed, and among of checklist items is to monitor compliance and the implementation of the policy and overall ethical business practice. Each operating unit conducts due diligence process using the checklist on monthly basis.</p> <p>Apart from that, annual internal audit is also one of the methods to ensure that management is effectively monitoring the compliance and policy implementation by the counterparties. Internal audit for RSPO requirements and financial implementation (finance internal audit) is conducted to ensure the policy and procedure of the company is implemented. In term of sustainability, there were RSPO & MSPO internal audit that has been conducted by Sustainable Compliance Unit, Group Sustainability Department on 23/05/2024 for Chaah Estate, 21/05/2024 at Chaah POM, 24/05/2024 at Sungai Simpang Kiri Estate, and 23/05/2024 at North Labis Estate.</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	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification continued to comply with legal requirements. Permits and licenses verified:</p> <p><u>Chaah POM</u></p> <p>i) Mill's compliance schedule under license no. 004721, ref: JAS.JHQ.600-3/1/31(SK03) valid from 1/7/24 to 30/6/25. Mill</p>	Complied

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		<p>processing capacity is 36 mt/hr using land application for method of POME disposal. Limit of discharge parameters are:</p> <p>- BOD₃: 2,500 mg/l</p> <p>ii) 3rd party environmental audits, at least once (1) a year, clause 23 of compliance schedule.</p> <p>Audit carried out by registered environmental auditors, lead auditor (EA0112). Date of assessment: 21/12/2023. No non-conformity issued and five (5) OFI raised by the auditor.</p> <p><u>Stack sampling</u></p> <table><tr><th>Year</th><th>Stack sampling</th><th>Results vs limit</th></tr><tr><td>2024</td><td>Iso kinetic sampling by PXX Testing & Consulting Sdn Bhd ref: EXXXX/SDPSB-KFPOM/ISO/053/2024 Date of monitoring: 25/06/2024</td><td>Dust/particulate: 147 mg/m³ vs 150 mg/m³ CO: 769 mg/m³ vs 1000 mg/m³</td></tr></table> <p>iii) List of certificates of fitness</p> <table><tr><th>Registration no.</th><th>Validity period</th><th>Remarks</th></tr><tr><td>JH PMD 762</td><td>Until 14/10/2025</td><td>Steam Boiler</td></tr><tr><td>JH PMD 80145</td><td>Until 12/09/2025</td><td>Steam Boiler</td></tr><tr><td>JH PMA 13364</td><td>Until 14/10/2025</td><td>Monorail Crain</td></tr><tr><td>JH PMT 21639</td><td>Until 14/10/2025</td><td>Sterilizer</td></tr><tr><td>JH PMT 20597</td><td>Until 14/10/2025</td><td>Sterilizer</td></tr><tr><td>JH PMT 21640</td><td>Until 14/10/2025</td><td>Sterilizer</td></tr></table>	Year	Stack sampling	Results vs limit	2024	Iso kinetic sampling by PXX Testing & Consulting Sdn Bhd ref: EXXXX/SDPSB-KFPOM/ISO/053/2024 Date of monitoring: 25/06/2024	Dust/particulate: 147 mg/m ³ vs 150 mg/m ³ CO: 769 mg/m ³ vs 1000 mg/m ³	Registration no.	Validity period	Remarks	JH PMD 762	Until 14/10/2025	Steam Boiler	JH PMD 80145	Until 12/09/2025	Steam Boiler	JH PMA 13364	Until 14/10/2025	Monorail Crain	JH PMT 21639	Until 14/10/2025	Sterilizer	JH PMT 20597	Until 14/10/2025	Sterilizer	JH PMT 21640	Until 14/10/2025	Sterilizer	
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JH PMT 21639	Until 14/10/2025	Sterilizer																												
JH PMT 20597	Until 14/10/2025	Sterilizer																												
JH PMT 21640	Until 14/10/2025	Sterilizer																												

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		SB PM 9187	Until 14/10/2025	Back Pressure Receiver	
		v) Private Water Supply System, Water Distribution and Water Treatment, license no.: LK/3/22/00019, valid from 30/06/22 to 29/06/2025.			
		vi) List of competent persons			
		Competent person	Validity period	Remarks	
		Certified Environmental Professional in Scheduled Waste Management (CePSWaM)	In progress (FTR submission)	CePSWaM/2319630	
		Certified Environmental Professional in the Treatment of Palm Oil Mill Effluent (CePPOME)	Certified on 27/03/2023	CePPOME/2421099	
		Steam Engineer, 1 st Grade	047/2008	5/05/2008	
		Steam Engineer, 2 nd Grade	JKKP/2023/JS02/309	8/06/2023	
		A4 chargeman	PJ-T-4-B-0505-2013	Valid until 25/11/2024	
		AESP	NW-SRO-AE-R-6692-U	Valid until 13/09/2024	

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		AGTES-R AGT379241-24 Valid until 22/12/2024	
		<p>vii) MPOB license no. 518940004000 valid until 1/03/2024 – 28/02/2025</p> <p>viii) Diesel permit no. PBKB/2024/P/J-000057, ref: JH(SGT)0130/06 PSK), storage capacity (diesel): 10,800 litre valid from 22/01/2024 – 21/01/2027</p> <p>ix) Water Abstraction License, license no. 08/A/BP/035, rate of abstraction, 500 m³ per day valid from 1/01/2024 to 31/12/2024.</p> <p>x) Electrical Installation License, serial no. 63880, license no. 2023/02839, maximum capacity: 2,880 kW valid from 12/11/2024 – 11/11/2025</p> <p>xi) Fire Certificate, ref. no. JBPM: JH/7/270/2024, serial no. 341646 valid from 12/06/2024 – 11/06/2025.</p> <p><u>Chaah Estate</u></p> <p>i) MPOB license no. 518848002000, valid from 1/03/2024 – 28/02/2025 for 2,795.36 ha for selling and transporting FFB.</p> <p>ii) MPOB license no. 617601011000, valid from 1/09/2024 – 31/08/2025 for production, selling and moving and storage of seedling.</p> <p>iii) Air receiver/compressor CF, MK PMT 1885 valid until 3/06/2025</p> <p>iv) Diesel permit no. PBKB/2024/P/J-000358, ref: JH(SGT)0123/05 PSK), storage capacity (diesel): 16,500 litre valid from 6/08/2024 – 5/08/2027</p> <p>iv) Permit for salary deduction, ref: JTKN.J600-44/(BP)-1(5) dated 31/0//2023 for electricity deduction range from RM10-RM90 per month, shared based on headcount per house.</p>	

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		<p>v) Weighbridge stamping/calibration:</p> <ul style="list-style-type: none"> - Calibration date: 7/06/2024, ref. no. DMSB/23/J4/ATK/20 capacity: 60,000 kg (Mettler Toledo), calibration certificate no. D108048 <p><u>Sg Simpang Kiri Estate</u></p> <ul style="list-style-type: none"> i) MPOB license no. 5532593002000, valid from 2/07/2024 – 30/09/2024 for 2,371.66 ha for selling and transporting FFB. ii) MPOB license no. 543698011000, valid from 2/07/2024 – 31/10/2024 for production, selling and moving and storage of seedling. iii) Diesel and petrol permit serial P no. J006183 , ref:JH(SGT)0155/10 PSK, storage capacity (diesel): 13,600 litre valid from 5/01/2023 – 04/01/2026 iv) Petrol permit, serial no. PK/2023/P/J-000762, ref no. SKK/10-16/B (545), approved volume: 150 liter (RON 95) valid from 9/01/2024 – 9/01/2025 v) Air receiver/compressor CF, JH PMT27205 valid until 3/06/2025 vi) Salary deduction approval, insurance premium under Group AIA, ref: JTKNJ.600-44/(BP)-101(7) dated 4/7/2024. <p><u>North Labis Estate</u></p> <ul style="list-style-type: none"> i) MPOB license no. 522496002000, valid from 1/08/2024 – 31/07/2025 for 1,944.3 ha for selling and transporting FFB (main division) ii) MPOB license no. 520479102000, valid from 27/06/2024 – 30/0/2025 for 1,588.59 ha for selling and transporting FFB. (Sg Labis Division) 	
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		<p>iii) MPOB license no. 622691011000, valid from 23/06/2024 – 31/05/2025 for production, selling and moving and storage of seedling.</p> <p>iv) Air receiver/compressor CF, MK PMT 1888 valid until 29/11/2024</p> <p>v) Air receiver/compressor CF, JH PMT 2909 valid until 29/11/2024</p> <p>vi) Diesel and petrol permit no. PBKB/2024/B/J-000622, ref: JH(SGT)0028/83P (SK), storage capacity (diesel): 11,000 litre valid from 10/06/2024 – 9/06/2027 (Sg Labis Division)</p> <p>vii) Diesel and petrol permit no. PBKB/2024/B/J-000623, ref: JH(SGT)0149/09 P(SK), storage capacity (diesel): 15,000 litre valid from 10/06/2024 – 9/06/2027 (Main Division)</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>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established legal and other requirements register @ LORR to have a list of legal register to ensure compliance is in place. The system has a means to track changes to the laws and regulations. The GSD Department is responsible to track changes and the information was disseminated to all its plantations and mill operation. The newly added laws and regulations as per the following:</p> <ul style="list-style-type: none"> - Employees Social Security (Amendment) Act 2022, date review 26/9/22 - Employment Insurance System (EIS) (Amendment) Act 2022, date review 26/9/22 - Employment Act (Amendment) 2022, date review 6/1/23 - <i>Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit 2021, date review 23/7/2023</i> - Occupational Safety and Health (Amendment) Act 2022, date review 1/4/2023. 	Complied

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		- Environment Quality Act (Amendment) 2024, date review 20/08/2024.										
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	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. Example of boundary inspected at visited estates: <table><tr><td>Estate</td><td>Location of boundary</td><td>Remarks</td></tr><tr><td>Chaah Estate</td><td>Field 19C</td><td>Boundary with smallholder</td></tr><tr><td>North Labis Estate</td><td>Field 99B</td><td>Boundary with house development project</td></tr></table> <u>Sg Simpang Kiri Estate</u> Based on site observation at HCV 4 (bund, field P04) estate boundary near smallholders (Sayung Mas), there was no boundary marking visibly maintained along the boundary area/trenches. The other area with no boundary stone has yet to be identified and re-demarcated as to ascertain the legal limit within estate boundary. Thus, a minor NC was issued.	Estate	Location of boundary	Remarks	Chaah Estate	Field 19C	Boundary with smallholder	North Labis Estate	Field 99B	Boundary with house development project	Non-compliance
Estate	Location of boundary	Remarks										
Chaah Estate	Field 19C	Boundary with smallholder										
North Labis Estate	Field 99B	Boundary with house development project										
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.												

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2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The list of contracted parties is available as per the stakeholders list. This list has been maintained up to date as of July 2024 at each visited operating unit. It includes various categories for contracted parties such as contractors, vendors/suppliers, foreign recruitment agencies, embassies, government agencies, schools, local communities, and CPO/PK customers. The list contains information on the names of nominated representatives, contact names, addresses, and contact numbers.</p> <p>During the audit, it was verified that the stakeholder lists have been duly updated. Telephone calls made to randomly sampled stakeholders confirmed the accuracy and currency of the information.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad established Contractor & Vendor Management Procedures (Date Approved: 17/11/2021). The objectives of the procedures:</p> <ul style="list-style-type: none"> • To define the procedure for managing the overall contractor's workers throughout Upstream Malaysia operations which includes provisions for safety, health, social, security, environmental, governance and legal compliance. • To provide guidance to Management on the processes of selecting and monitoring of C&V. • To protect the safety & health of employees & other people at workplace. • To ensure only C&V with acceptable standards are allowed to do business & work within SDP OUs <p>There is no Outside Crop Producer (OCP) for Chaah POM as the mill only receive and process the FFBs supplied from SD Guthrie oil palm plantations. However, for appointed service providers/ contractors,</p>	Complied

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		<p>the contract agreement/letter of award contains specific clauses on meeting applicable legal requirements which stated under Compliance with applicable laws and guidelines. Samples of VIP document signed are as follows:</p> <ul style="list-style-type: none"> • VIP from Rxxxxxx Axxxx Axxx Txxxxxx: Grasscutting works contractor • VIP from Hxxxxx Exxxxxxxxx: Land Preparation and Related works for Oil Palm Replanting • VIP from Pxxxxxxxx Kxxxxxx Sxxxx: FFB Transporter • VIP from Qxxxxxx Sxxxxxx: Land Preparation and Related works for Oil Palm Replanting • VIP from Pxxxxxx Exxx: Construction & Completion of Surau • VIP from Rxxxxxxxx Sxxxx: FFB Transporter • Axxxxxxxx: School Children Transporter <p>Based on the sampled above, the Vendor Integrity Pledge (VIP) or in Bahasa Malaysia 'Ikrar Integriti Vendor' that consists of:</p> <ul style="list-style-type: none"> • Vendor Code of Business Conduct (VCOBC) <ul style="list-style-type: none"> ▪ Labour and Human Rights ▪ Environment, safety and Health ▪ Ethics and Management Practices • All applicable laws and regulations relating to anti-bribery, fraud and corruption: and the following anti-corruption principles <ul style="list-style-type: none"> ▪ Committing to promote values of integrity, transparency, accountability and good corporate governance ▪ Strengthening internal systems that support corruption prevention 	
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		<ul style="list-style-type: none"> ▪ Fighting any form of corrupt practice ▪ Supporting corruption prevention initiatives by the Government and the local authorities <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors are submitted at the time of audit. The payslip of the contractor workers being maintained and reviewed by respective estate and mill management in the contractor's personal file. Based on the payslip for month of July 2024, all contractor workers were paid more than minimum wages. Due diligence is also conducted via Online Vendor Registration (OVR) to check the legality of the business entities.</p> <p>This comprehensive approach in the agreements ensures a robust framework for legal compliance, ethical practices, and commitment to industry standards.</p>	
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>SD Guthrie Berhad has established the Vendor Integrity Pledge and Vendor Code of Business Conduct (VCOBC). The VCOBC contains clauses disallowing child, forced and trafficked labour. It can be sighted under:</p> <p>5.7 Eradication of Exploitation - The Group endeavors to eradicate all forms of bonded and forced labour, slavery, human trafficking, and sexual exploitation by implementing International Labour Organisation (ILO) core labour standards and conventions. When supplying labour to perform work for the Group, Vendors shall refrain from using or facilitating any of the following activities:</p> <ul style="list-style-type: none"> • The Vendors' Employees are not charged with recruitment fees for the purpose of restricting free movement. 	Complied

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		<ul style="list-style-type: none"> • Original identification documents of the Vendors' Employees such as passport or work permits are not retained involuntarily by Vendors. • Payment of the Employees' salaries are not withheld or delayed beyond the extent permitted by applicable laws and regulations in the countries where the Vendors operate. • In addition, the Vendors shall ensure that recruitment of its Employees and workers are done via legitimate recruitment agencies, which are properly licensed to operate under applicable laws. <p>5.8 Abolishment of Child Labor & Protecting the Rights of Children – The Group seeks to promote the well-being of children and safeguard them from any form of maltreatment or exploitation, including but not limited to child sex tourism, child trafficking, and child pornography. As such, Vendors shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate, unless in vocational and/or formal and structured apprenticeship, educational and training programmes.</p> <p>Verified against contractor list, OVR and signed copies of Vendor Integrity Pledge.</p>	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license 	<p>Chaah POM received only FFB from mainly from SOU 20 own supply base crop and from other RSPO certified estates under SD Guthrie Berhad.</p> <p>a) All FFB from the SDP estates supported by the delivery documents.</p> <p>b) Valid land title with ownership status (refer indicator 4.4.1)</p>	Complied

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	- Critical (Major) compliance -	c) Valid MPOB licence (refer criteria indicator 2.1.1) All delivery documents were verified with volumes of FFB received by the mill.	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1. - Minor compliance -	No indirectly sourced FFB received by Chaah POM.	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	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	<p>All estates have established yearly financial budget for their Capital Expenditure (CAPEX) and Operation Expenditure (OPEX) which detailing their allocation for details as below:</p> <ul style="list-style-type: none"> • FFB projection from each block • Income and expenditure • Sundry Revenue • Operation Cost • Capital Expenditures • General Charges • Hectarage Statement <p>On the other hand, 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> <ul style="list-style-type: none"> • Mill intake – FFB input • Production of CPO • Production of PK • Total Palm Oil Extraction • Total Palm Kernel Extraction 	Complied

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		<ul style="list-style-type: none">• Mill cost																									
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	<div>The estates have established the replanting plan. The plan is as the following:</div> <table><tr><td>Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Chaah Estate</td><td>186.07</td><td>95.15</td><td>207.93</td><td>262.78</td><td>239.46</td></tr><tr><td>Sungai Simpang Kiri Estate</td><td>43.20</td><td>103.98</td><td>120.43</td><td>-</td><td>-</td></tr><tr><td>North Labis Estate</td><td>277.93</td><td>134.59</td><td>118.76</td><td>152.96</td><td>131.86</td></tr></table>	Estate	2024	2025	2026	2027	2028	Chaah Estate	186.07	95.15	207.93	262.78	239.46	Sungai Simpang Kiri Estate	43.20	103.98	120.43	-	-	North Labis Estate	277.93	134.59	118.76	152.96	131.86	Complied
Estate	2024	2025	2026	2027	2028																						
Chaah Estate	186.07	95.15	207.93	262.78	239.46																						
Sungai Simpang Kiri Estate	43.20	103.98	120.43	-	-																						
North Labis Estate	277.93	134.59	118.76	152.96	131.86																						
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	<div>Each operating unit within the Chaah Palm Oil Mill supply bases has conducted a Management Review, which includes discussions on the results of internal audits, customer feedback, process performance and product conformity, the status of preventive and corrective actions, changes that could affect the management system, and any recommendations for improvement. Details of management review meeting was reviewed as table below:</div> <table><tr><td>Estate</td><td>Date</td></tr><tr><td>Chaah Estate</td><td>06/06/2024</td></tr><tr><td>Chaah POM</td><td>12/07/2024</td></tr><tr><td>Sungai Simpang Kiri Estate</td><td>02/08/2024</td></tr></table>	Estate	Date	Chaah Estate	06/06/2024	Chaah POM	12/07/2024	Sungai Simpang Kiri Estate	02/08/2024	Complied																
Estate	Date																										
Chaah Estate	06/06/2024																										
Chaah POM	12/07/2024																										
Sungai Simpang Kiri Estate	02/08/2024																										

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		North Labis Estate	21/07/2024								
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	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>This has been established in the Continuous Improvement Plan 2024 respectively for both the Mill and Estates. This compilation was made with subject to the consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments maintained available. Among the documents were:</p> <p>(a) Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers.</p> <p>(b) Environmental Improvement Plan 2024</p> <p>(c) Pollution Prevention Plan 2024</p> <p>(d) Water Management Plan. 2024</p> <p>(e) Waste Management Plan 2024</p> <p>The Continuous Management Plan 2024 for the estate/mill operations among others include the following example under CAPEX</p> <table><tr><td></td><td>Operating unit</td><td>Budget Details (CAPEX 2024/2025)</td></tr><tr><td rowspan="2">1</td><td rowspan="2">Sg Simpang Kiri</td><td>Water gate (flood mitigation)</td></tr><tr><td>Concrete road (at steep and slippery area)</td></tr></table>			Operating unit	Budget Details (CAPEX 2024/2025)	1	Sg Simpang Kiri	Water gate (flood mitigation)	Concrete road (at steep and slippery area)	Complied
	Operating unit	Budget Details (CAPEX 2024/2025)									
1	Sg Simpang Kiri	Water gate (flood mitigation)									
		Concrete road (at steep and slippery area)									

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				Bund heightening project (flood mitigation)	
				Upgrading of ceiling and roof (asbestos material replacement)	
		2	Chaah Estate	Kubota L3200DT (mechanization)	
				New water pipeline for estate residential (6 km) head loss problem	
		3	North Labis Estate	Kubota M6040, Kubota L3200DT (mechanization)	
				New van for workers transport	
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>RSPO metric template version 2.1 is used for the reporting of SOU20 Chaah POM Certification Unit's metrics (economic, social and environment). Data reporting period is January to December 2023 for (social and environment metrics) and economic metrics from August 2023 – July 2024 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</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 System and EOMS (Estate Quality Management System) for</p>			Complied

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		<p>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 • 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>	Complied

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		<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• Agronomic Highlights and Fertiliser Visit by Agronomist• Structured Oil Recovery Assessment (SORA) by Performance Monitoring Unit for palm oil mill• Monthly Crop Recovery Assessment, for January to July 2024									
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<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: <table><tr><td>Estate</td><td>Date of visit</td></tr><tr><td>Chaah Estate</td><td>06/03/2024</td></tr><tr><td>Sungai Simpang Kiri Estate</td><td>16/08/2024</td></tr><tr><td>North Labis Estate</td><td>07-08/03/2024</td></tr></table>	Estate	Date of visit	Chaah Estate	06/03/2024	Sungai Simpang Kiri Estate	16/08/2024	North Labis Estate	07-08/03/2024	Complied
Estate	Date of visit										
Chaah Estate	06/03/2024										
Sungai Simpang Kiri Estate	16/08/2024										
North Labis Estate	07-08/03/2024										

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		<ul style="list-style-type: none"> • Fly by Visit for safety and infrastructure monitoring purpose at mill on 09/06/2024 (Chaah Estate), 10/06/2024 (Chaah POM) 13/06/2024 (Sungai Simpang Kiri Estate), 10/06/2024 (North Labis). The assessment was conducted by Region Officer in Charge as to validate compliance of Health & Safety elements in estate and mill. • 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. The visit took place on 08/02/2024 at Chaah Estate, and 09/02/2024 at North Labis Estate • Structured Oil Recovery Assessment (SORA) by Performance Monitoring Unit for palm oil mill, dated 12-16/08/2024. The assessment conduct inspection on various parameters such as CPO Stock Management, PK Stock Management, Dispatch Flow Meter, FFB Process & Balance Declaration, Security Surveillance Status, Oil & Kernel Losses Declaration, and Sludge Oil Recycle Process. • Monthly Crop Recovery Assessment, for Jan – July 2024 • In term of sustainability, there were RSPO & MSPO internal audit has been conducted by Sustainable Compliance Unit, Group Sustainability Department on 23/05/2024 for Chaah Estate, 21/05/2024 at Chaah POM, 24/05/2024 at Sungai Simpang Kiri Estate, and 23/05/2024 at North Labis Estate. 	
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.			

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3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>SOU20 Chaah has carried out an aspect and impact assessments relating to environmental impacts based on documents as following:</p> <ul style="list-style-type: none"> a) Appendix 5.4.1b – Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register b) Appendix 5.4.1c – Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI c) Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE. <p>There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However, the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered.</p> <p>The mill and estates have continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and Assistant Managers of mill and estate were identified as person-incharge of the programme(s) which were established upon review of the aspect and impact register.</p> <p>SOU 20 UoC has separate Social Impact Assessment (SIA) and Environmental Impact Assessment reports.</p> <p>As of the date of the audit, there has been no new planting or expansion of existing ones conducted by each operating unit of the</p>	Complied
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		<p>UoC. This has been verified through the following documents and facts:</p> <ul style="list-style-type: none"> a) Hectare statement compared to the previous year. b) Interviews with the management. c) Field visits and verification. <p>However, there are addenda to the existing SIA at respective operating units as follows:</p> <p>Addendum Social Impact Assessment (SIA) on Replanting Activity for Chaah Estate:</p> <ul style="list-style-type: none"> • Conducted on: 07/02/2024 • Objective of the assessment: <ul style="list-style-type: none"> ○ To brief workers on the replanting activity and its potential impacts on workers. ○ To identify any concerns from workers regarding the replanting activity. ○ To develop a management plan to address any concerns from workers (if any). • Assessment Team: Senior Assistant Manager and 2 Assistant Managers II. • Outcome: No concerns were raised by workers as replanting activity is a normal occurrence (almost annually) in the estate. • Thus, no action plan was required as no concerns or complaints were recorded from the assessment. <p>Addendum SIA on the Construction of New Surau for Sungai Simpang Kiri Estate:</p> <ul style="list-style-type: none"> • Assessment Date: 07/11/2023 	
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		<ul style="list-style-type: none"> • Objective of the assessment: <ul style="list-style-type: none"> ○ To brief workers on the construction of the new surau and its potential impacts on workers. ○ To identify any concerns from workers regarding this construction activity. ○ To develop a management plan to address any concerns from workers (if any). • Assessment Team: Assistant Manager I and Assistant Manager II. • Outcome: No concerns were raised by workers as the construction of the new surau will benefit them in terms of capacity and comfort during worship. Thus, no action plan was required as no concerns or complaints were recorded from the assessment. <p>Addendum Social Impact Assessment (SIA) on Replanting Activity for Sungai Simpang Kiri Estate:</p> <ul style="list-style-type: none"> • Conducted on: 25/04/2024 • Objective of the assessment: <ul style="list-style-type: none"> ○ To brief workers on the replanting activity and its potential impacts on workers. ○ To identify any concerns from workers regarding the replanting activity. ○ To develop a management plan to address any concerns from workers (if any). • Assessment Team: 2 Assistant Managers II. • Outcome: No concerns were raised by workers as replanting activity is a normal occurrence (almost annually) in the estate. 	
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		<p>Thus, no action plan was required as no concerns or complaints were recorded from the assessment.</p> <p>Addendum SIA on AP's Quarters Construction Activity for North Labis Estate:</p> <ul style="list-style-type: none"> • Conducted on: 18/06/2024 • Objective of the assessment: <ul style="list-style-type: none"> ○ To brief workers on the new AP's quarters construction activity and its potential impacts on workers. ○ To identify any concerns from workers regarding the new AP's quarters construction activity. ○ To develop a management plan to address any concerns from workers (if any). • Assessment Team: Senior Assistant Manager, 2 Assistant Managers I, Field Officer, and AP. • Outcome: No concerns were raised by workers as the construction site activity has been separated with a partition, a new heavy machinery route, and is not near the current linesite. Thus, no action plan was required as no concerns or complaints were recorded from the assessment. <p>Addendum Social Impact Assessment (SIA) on Replanting Activity for North Labis Estate:</p> <ul style="list-style-type: none"> • Conducted on: 11/03/2024 • Objective of the assessment: <ul style="list-style-type: none"> ○ To brief workers on the replanting activity and its potential impacts on workers. ○ To identify any concerns from workers regarding the replanting activity. 	
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		<ul style="list-style-type: none"> ○ To develop a management plan to address any concerns from workers (if any). • Assessment Team: Senior Assistant Manager, 2 Assistant Managers I, Field Officer, and AP. • Outcome: No concerns were raised by workers as replanting activity is a normal occurrence (almost annually) in the estate. Thus, no action plan was required as no concerns or complaints were recorded from the assessment. 																																	
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 aspect and impact analysis for all the mill/estate operations are documented and revised annually recent being for 2024. In the comprehensive report, the study of aspect and impact are aimed to;</p> <p>a) Plan to avoid negative impact and to promote positive impacts. b) Reduction disposal of waste taking into consideration of social responsibilities. c) Plan to reduce pollution and release of GHG d) Development and implementations.</p> <p>The aspect and impact covered the following activities/operations among others;</p> <table border="1"> <thead> <tr> <th></th><th>Estate</th><th></th><th></th></tr> <tr> <th></th><th>Activities</th><th></th><th>Activities</th></tr> </thead> <tbody> <tr> <td>1</td><td>Poisoning of VOPs/ woodies</td><td>7</td><td>Vehicle maintenance by contractors</td></tr> <tr> <td>2</td><td>Circle spraying</td><td>8</td><td>EFB application</td></tr> <tr> <td>3</td><td>Management of empty containers</td><td>9</td><td>Fertilizer storage /application</td></tr> <tr> <td>4</td><td>Rat baiting</td><td>10</td><td>Grass slashing</td></tr> <tr> <td>5</td><td>Diesel Reception</td><td>11</td><td>Chemicals storage</td></tr> <tr> <td>6</td><td>Triple rinsing</td><td>12</td><td>Grading of FFB</td></tr> </tbody> </table>		Estate				Activities		Activities	1	Poisoning of VOPs/ woodies	7	Vehicle maintenance by contractors	2	Circle spraying	8	EFB application	3	Management of empty containers	9	Fertilizer storage /application	4	Rat baiting	10	Grass slashing	5	Diesel Reception	11	Chemicals storage	6	Triple rinsing	12	Grading of FFB	Complied
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		13	Replanting	
	Chaah Palm Oil Mill			
	Activities		Activities	
1	Effluent treatment	7	EFB storage	
2	Engine room operations	8	Laboratory	
3	Boiler operations	9	Workshop operations	
4	CPO storage	10	Sterilization	
5	Diesel Reception/storage	11	Chemicals storage	
<p>Social Impact Assessment for SOU 20 (Chaah POM, Chaah Estate, North Labis Estate, and Sungai Simpang Kiri Estate) was conducted on 6-9 April 2015 by Social & Environment Projects Unit, PSQM Department. In this assessment, the findings are classified into 5 different listing i.e., Good Practices, Issues, Complaints, Suggestion, and Other findings by stakeholders. Further verification also indicates that the assessment has focuses several key areas as follows (mention in attachment 1 of the SIA report):</p> <ul style="list-style-type: none"> • Housing/living condition • Health facilities • Environment impact (air/water quality) • Health condition due to work/task • Education (creche) • Entertainment facilities (playground, hall, etc.) • Working environment/condition (salary, etc.) • Relationship with management • PPE distribution • Training/information sharing • Annual event/celebration • Welfare (goods, donation) 				

- Co-existence with migrant workers
- Complaint/grievance procedure (complaint channel, etc.)
- Union (annual meeting, efficiency)
- Transportation (to school, nearby stores, emergency)
- Harassment

Management plan has been established by each operating units and has been verified by the audit team. There is evidence that the management plan has been developed in participatory ways with the stakeholders. This has been verified during stakeholder consultation conducted with several stakeholder during the audit.

Chaah Estate: Management Plan on SIA FY 2024 was prepared by Assistant Manager and reviewed by Estate Manager. There are 10 area of concern listed in the management plan, sampled as below:

Areas of Concerns/ Key Findings	Action Plan	Status	PIC	Completion Date
Cattle Issues – discussed trespassing into prohibited area	instruct the cattle owner to bring out the cattle from estate area by phase rise fencing surrounding linesite area	Based on AP records, the cattle owners bring out the cattle by phase The fencing has been rise until main office area.	Exec, AP	Continuous Inspection
Drug Issue	AP have no authority to arrest; give	Good rapport with balai polis chaah	Exec, AP	Continuous implementation

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			information to the estate management and call the police for next action Continuous patrol at linesite for safety concern	and yong peng			
		Smallholder Issue Theft issue regarding crop Bad road condition	Crop from the estate use internal road from estate to the mill Frequent patrol by AP at estate boundary – no report or activity theft Quarry always maintained the Kg. Seri jagung roads All lorry drivers must adhere the speed limit	Continuous patrol by the AP Quarry still maintained the road condition Based on AP records, the quarry and FFB lorry are adhering the speed limit	Exec, AP	Continuous implementation	
		Wild dogs at linesite area	Monitoring and try to expel the wild dogs from enter	AP patrol the area	AP	Continuous	

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			the linesite area			
Chaah POM: Management Plan on SIA FY 2024 was prepared by Assistant Manager and reviewed by Mill Manager on 18/01/2024.						
		Areas of Concerns/ Key Findings	Action Plan	Status	PIC	Completion Date
		The road condition from mill to workers quarters perforated and damaged especially during rainy season	Mill Management has raised the issue to estate management	Chaah Estate has repaired some road area and provide crushing run. They will continue repair work if any road damaged reported.	General Supervisor	Continuous
		Lack of lighting at workers quarters road especially at night	Management has installed street solar light at workers quarters	Management will continue adding solar light at certain place if necessary	Mill Assistant	Continuous
		There were some FFB lorry driver was speeding at mill entrance	Mill management will discuss with estate management to rebuild back for existing hump	Management had completed rebuild hump alongside the road to mill for avoids over	Mill Engineer	Done

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			speeding transport			
	Cow in housing area	Estate management has installed barbed fencing to prevent the cow from entering housing area.	Estate management has created WhatsApp group with cattle owner and management . Any communication will inform directly in the group.	Estate Assistant	Done	
	<p>Sungai Simpang Kiri Estate: Management Plan on SIA FY 2024 was prepared by Assistant Manager and reviewed by Mill Manager on 14/02/2024. 7 key findings identified, sampled as below:</p>					
	Areas of Concerns/ Key Findings	Action Plan	Status	PIC	Completion Date	
	Linesite/Workers Housing Damage facilities and crowded workers was found in one house.	Information about types of housing and facilities damaged. Repaired and service the damage or effected houses.	All the workers housing complaints through the OPP has been carry out by date of complaint. Estate has engaged with contractor	Exec	Continuous November 2024	

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		Cracked drainage at linesite	Repair the cracked drain by stages.	for drainage maintenance			
		Pollution Proper waste management	Create awareness to the workers the importance of waste management and control. No open burning held on housing site.	Awareness was continuously communicated to the workers and open burning is prohibited	Exec	Latest training was conducted on 18/06/2024	
		Gender Committee Encourage more women workers to participate in more activities, e.g., games, travelling, cooking, competitions, and gotong-royong.	To continue the quarterly meetings to enable the women to express and discuss on issues related to them. Policy need to be developed.	Gender committee actively conducted their meeting on quarterly basis. Procedure on gender have been revised in 2024.	Chairman of Gender Committee	Continuous.	
		North Labis Estate: Management Plan on SIA FY 2024 was prepared by Assistant Manager and reviewed by Estate Manager on 14/08/2024. 3 key findings identified, sampled as below:					

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		Areas of Concerns/ Key Findings	Action Plan	Status	PIC	Completion Date	
		Request to add rest huts in field 2014A, 2014C, 2015A, 2016C and Simpang Lima. This is concerning workers safety.	Will construct add rest huts at the mentioned field	In progress	AM	In progress	
		Several areas within the housing complex suffer from inadequate lighting, resulting in dark spots that compromise safety and security during nighttime	Road in the housing area will be repaired To install solar lights at every 3 intersections in housing area	In progress	AM	In progress	
		Cracked drains	The cost for constructing drainage in the housing area are insufficient	In progress of seeking suitable quotations and will prioritize	AM	In progress	

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		small drains first			
		<p>Despite the above, there are good practices identified during the assessment that has been highlighted by the stakeholders, for example:</p> <ul style="list-style-type: none"> Relationship between workers from different nationalities, and between workers and management is good. Foreign workers are able to adapt with local community, and acceptance of local community towards them has created a harmonious living and working environment. Management emphasizes strongly on safety and health. Workers and staff show that they understood and accepted safety and health culture at workplace. Payment procedures to suppliers and contractors are in place. Positive feedback is received from them regarding this matter. Infrastructure and amenities wise, management has efforts to improve the overall living condition for workers. Maintenance of housing complex is done in timely manner. <p>List of stakeholders met and interview during the assessment is made available in the report covering stakeholders' groups i.e., local workers, foreign workers, contractors, relevant government agencies and local communities residing within the vicinity of the UoC.</p>			
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Environmental Management Plans were developed, consisting of EAI & EIE, Waste Management Plan, Water Management Plan, HCV Area & Biodiversity, Energy Management & Pollution Prevention and IPM Management which were available for verification. Among the implantation of the environment</p>			Complied

		<p>management plan were mainly focused on environmental conservations and reductions of pesticides and fossil fuels. Among the implementation that were verified included the implementation of IPM in the estates such as the well-established beneficial plants, segregation of waste and disposal in accordance with legal requirements, bi-annual monitoring of smoke emission at the mill, well established buffer zones and periodic water quality monitoring among others. The Environment Management Plan is reviewed yearly, usually at the beginning of the year with inputs obtained from the management and workers representatives.</p> <p>The Social Management Plan 2024 for each unit includes detailed information on issues, management plans, persons in charge (PIC), and time frames. Inputs for these plans are gathered from various meeting minutes, including:</p> <ul style="list-style-type: none">• Gender Committee and NUPW meetings• Safety meetings• Complaints and requests from internal and external stakeholders• Muster briefings• Stakeholder meetings <p>Issues raised by stakeholders are incorporated into a management plan. The social profile, including the social background of employees, local community background, education, safety and health, living conditions, infrastructure, amenities, and stakeholder engagement, is considered in the assessment.</p> <p>For existing operations, social impact management plans are developed and updated regularly by each operating unit. Updates</p>	
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		<p>are based on feedback and issues collected during various meetings, such as stakeholder meetings, social dialogue sessions, OSH meetings, trade union meetings, and entries in the complaint book. Each operating unit has developed a Management Plan on Social Impact Assessment for 2024, which includes areas of concern/key findings, action plans, status, persons in charge, and completion dates.</p> <p>The management plan is reviewed and updated regularly in a participatory manner, based on feedback and issues collected during various meetings. Verification during the audit found evidence that all issues highlighted in the social impact assessment and management plan have been addressed, as confirmed through document reviews and interviews with sampled stakeholders. There are no recurring issues for those highlighted in the assessment.</p>	
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>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has documented its employment procedures in two key documents, Migrant Worker Responsible Recruitment Procedure, dated 20/08/2021 and Guideline on the Recruitment of Local Workers, dated 07/12/2020. The purpose of this documents is to explain recruitment processes for both local and foreign workers including pre and post recruitment. Among other aspects, the procedure has outlined the selection, hiring, promotion, retirement, and termination of workers.</p> <p>As specified in the Migrant Worker Responsible Recruitment Procedure, SD Guthrie Berhad conduct selection and recruitment of migrant workers directly in the respective countries of origin. The recruitment of foreign workers will be carried out by the Workforce Management Unit (WMU) and HR department. WMU is</p>	Complied

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		<p>responsible for conducting a briefing to potential workers on the job and provide the following information to the potential candidates during interview session:</p> <ul style="list-style-type: none">- Job requirements- Terms and condition of the work (e.g., wages, work hours, leave, benefit, safety, and health)- Policy- Grievance channels available <p>After the interview, workers will also be questioned about whether they have encountered any unethical practice, deceptive processes, or intimidation from any party involved.</p> <p>Section 3.2 of the procedure also mentions that where there is a requirement to use the services of recruitment agents (vendor) in the origin country, company shall enter into partnership agreements to ensure the process recruitment managed by recruitment agents is transparent and follow the rules and standard required by the company. Other part mentions in the procedure are no charging of recruitment fees, transparent terms and conditions of employment in contracts, no withholding of passports or personal documents and grievance channels. The appendix in the procedure has summarizes the process flow of migrant workers recruitment from start of the recruitment process to the end.</p> <p>While for hiring local workers, section 4 of the Guideline on the Recruitment of Local Workers states that operating unit need to identify vacant positions in operations and request for necessary approvals to recruit new workers. Interested applicants are required to fill out an Application Form. They will be screened and shortlisted for an interview by Assistant Manager at the operating</p>	
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		<p>unit. During interview, the Assistant Manager is to brief the applicant the job, tasks, and expectations, in a language that they understand. List of successful applicants will be provided to the Manager for final approval for recruitment. Prior to commencing work, workers will be given an induction briefing and the briefing includes information on:</p> <ul style="list-style-type: none"> – Employment contract terms and conditions – Company policies – Housing rules – General details on operations 	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Based on interview with sampled workers and relevant stakeholder and documentation review, it was found that employment procedures as mentioned in indicator 3.5.1 were implemented and all the records are adequately maintained. Induction process is mandatory to be carried out by operating units to ensure company's rules and regulations were socialized and acknowledged by the workers.</p> <p>Induction briefing, fill out application form, medical checkup, interview session, briefing on salary, employment terms and conditions, as well as information about grievance channel were conducted as per required in the procedures established. This was confirmed during interview with sampled workers comprising both of foreign workers from different origin countries and local workers. During the audit, stakeholder consultation was conducted with several neighbouring operating unit and local community. It was noted that job vacancies, if any, would be advertised near the locations of the operating units.</p> <p>At the operating units, application forms, interview assessment form, medical check-up report, copy of identification documents and employment contract for newly recruited employees were</p>	Complied

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		made available for verification. These are among the pre-requisites outlined in the recruitment procedure.	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>According to SD Guthrie's OSH Risk Management Procedure ver. 1, which effective on 09/03/2021, it was stated that monitoring and review of HIRARC shall be conducted when:</p> <ol style="list-style-type: none"> 1. Significant changes in work activity, process, practices, or procedures 2. Change in working environment including changes in organization structure and personnel changes 3. Evidence that control measures are not working as intended e.g., accidents, incidents, and equipment's failure hazard reports. 4. When directed by the Director General DOSH. <p>Details of risk assessment for health and safety concern were summarized as below:</p> <p><u>Chaah Estate</u></p> <ul style="list-style-type: none"> • HIRARC was last reviewed on 30/04/2024 for manuring activities due to accidents on 22/04/2024. Verified other operation activities were updated on yearly basis. • Chemical & Health Risk Assessment (CHRA) has been conducted on 23/05/2023, Ref. No. HQ/22/ASS/00/00052-2023/41 by assessor with DOSH Registration No. HQ/22/ASS/00/00052. The assessment covered 13 work units which includes Nursery Activities, Drone Spraying Operator at Plantation and Nursery, Manual Rat Baiting Operator, Manual Manuring Operator, Water Treatment Operator, Manual Spraying Operator, Mechanical Spraying 	Complied

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		<p>Operator, Trunk Injection Operator, Workshop Operator, Storekeeper and Fogging Operator.</p> <ul style="list-style-type: none">• Latest Medical Surveillance conducted 17-18/05/2024, Ref No. 057/OHD/2025 with Klinik Segamat, DOSH No. HQ/08/DOC/00/545 involving 22 workers which involves in spraying, chemical premixing, and workshop operation. 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 26/08/2020, conducted by an assessor with DOSH registration no. HQ/16/PEB/00/158 for activities such as tractor driver, workshop operator, MTG driver, FM3 driver, Zenoah Blower operator and Knapsack Grass Cutter. Result of the assessment found that all activities were below noise exposure limit and no further action required.• Latest audiometric test was conducted 19/01/2024 and 24/01/2024 which involved 27 workers who works among tractor drivers, foreman, machine specialist, MTG driver and Badang drivers. All of them has normal result except for 3 workers who required to retest the audiometric test. Retest for the 3 workers has been conducted on 24/01/2024 and no further concern concluded. The workers required to continue with annual audiometric test accordingly. <p><u>Chaah POM</u></p> <ul style="list-style-type: none">• HIRARC was available to address all the risks and hazards associated to the operations in the mill. There was update at Clarification Station due to accident occurred which caused 65 days Medical Leave.	
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		<ul style="list-style-type: none">• Chemical & Health Risk Assessment (CHRA) has been conducted on 26/06/2023, Ref. No. HQ/22/ASS/00/00052-2023/15 by assessor with DOSH Registration No. HQ/22/ASS/00/00052. The assessment covered 8 work units which includes Lab Analyst, ETP Lab Operator, Process Operator, Boiler Treatment Operator, Maintenance (Mechanical), Workshop (Electrical), Storekeeper & Scheduled Waste Handler, and Water Treatment Plant Operator.• Medical Surveillance was conducted from 09-11/12/2023 involving 17 workers who exposed to hexane, ammonia, iodine, silver, manganese, and gasoline. It was confirmed that there is no further medical concern by OHD.• Baseline Noise Risk Assessment was conducted on 13/02/2024 by assessor with DOSH reg. no. HQ/16/PEB/00/158 for 15 stations: WTP Plant, JCB Operator, Blower Operator, ETP Plant, Engine Room, Sterilizer Plant, Threshing Station, Kernel Plant, Press Station, Tractor Operator, Oil Room, Boiler Plant, Workshop, Ramp and Laboratory. It was found that 7 out of 15 personnels exposed to above the daily noise exposure limit (DNEL), 85 dB (A).• Mill completed its Audiometric Test on 23/10/2023 by assessor with DOSH registration no. HQ/08/DOC/00/468. 79 workers were involved resulting 17 workers required to further examination by OHD and 4 workers required to do retest of audiometric test. All 17 workers sent to for medical checkup on 13-14/12/2023 and all workers were found to be medically fit. While retest of audiometric test conducted on 13/12/2023 for 4 workers identified. It was concluded that the hearing impairment of the 4 workers	
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		<p>were non-occupational noise related hearing disorders.</p> <ul style="list-style-type: none"> Annual Local Exhaust Ventilation (LEV) System Examination and Testing Report was conducted on 19/02/2024 by third party assessor with Reg. No. JHK2774. It was found that all the parameters monitored for Lab Fume Hood had complied with the respective limit stipulated under the legal regulation. <p><u>Sungai Simpang Kiri Estate</u></p> <ul style="list-style-type: none"> HIRARC was last reviewed on 21/04/2024 harvesting activities due to HSE alert from Safety & Health Department. Verified other operation activities were updated on yearly basis. Chemical & Health Risk Assessment (CHRA) has been conducted on 23/05/2023, Ref. No. HQ/22/ASS/00/00052-2023/47 by assessor with DOSH Registration No. HQ/22/ASS/00/00052. The assessment covered 13 work units which includes Chemical Premix Operator, Manual Manuring Operator, Drone Rat Baiting Operator, Spraying, Manuring & Rat Baiting Operator, Drone Spraying Operator for Nursery and Immatured, Spraying & Manuring Operator, Manual Spraying Operator, Trunk Injection Operator, Foreman Assistant & Fogging Operator and Storekeeper. Latest Medical Surveillance conducted 9-17/10/2023, Ref No. 088/OHD/2023 with Klinik Segamat, DOSH No. HQ/08/DOC/00/545 involving 19 workers which involves in spraying, chemical premixing, and workshop operation. Report of the medical surveillance was available for review and no further medical concerns was noted. 	
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		<ul style="list-style-type: none">• The estate completed its Baseline Noise Risk Assessment, Ref. No. HQ/LPROYKPEB/21/00323 on 27/08/2020, conducted by an assessor with DOSH registration no. HQ/16/PEB/00/158 for activities such as tractor driver, workshop operator, MTG driver, Trunk Injection Driller Operator, Zenoah Blower operator and Knapsack Grass Cutter. Result of the assessment found that all activities were below noise exposure limit and no further action required. Updated Noise Risk Assessment has been conducted recently on 26/08 – 21/10/2022 which covers additional activities such as Badang Harvesting, Badang Sprayer, Cantas P70, ST102, and MTFA. The report concluded that Badang Harvester Driver, MTFA Driver, ST 102 Driver, and Foreman (while handling fogging machine) were exposing to equal or above Noise Exposure Limit (NEL) during working. Thus, Personal Hearing Protector with sufficient Noise Reduction Rating (NRR) shall be provided in addition to annual Hearing Conservation Training.• Latest audiometric test was conducted 02/11/2023 which involved 27 workers who works among tractor drivers, foreman, machine specialist, MTG driver and Badang drivers. All of them has normal result except for 3 workers who required for further examination by OHD. Examination for the 3 workers has been conducted on 10/11/2023 and as the result, 1 of them was concluded has Occupational Noise Related Hearing Disorders (ONRHD) and required to notify DOSH via JKKP 7 report submission while no further concern for the remaining 2 workers. JKKP 7 submission was reviewed and evident.• Airborne Contaminant for Chemicals Hazardous to Health Monitoring was conducted for workshop operator on	
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		<p>30/04/2024, Ref. No. IHT(JP)/24-04/09. It was concluded that the operator was under permissible exposure limit (PEL).</p> <p><u>North Labis Estate</u></p> <ul style="list-style-type: none"> • HIRARC was last reviewed on 18/05/2024 for oil palm census activities due to accident occurred which caused LTI for 4 days. Verified other operation activities were updated on yearly basis. • Chemical & Health Risk Assessment (CHRA) has been conducted on 24/05/2023, Ref. No. HQ/22/ASS/00/00052-2023/38 by assessor with DOSH Registration No. HQ/22/ASS/00/00052. The assessment covered 12 work units which includes Chemical Premix Operator, Manual Manuring Operator, Spraying, Manuring & Rat Baiting Operator, Drone Spraying Operator for Nursery, Spraying & Manuring Operator, Manual Spraying Operator, Trunk Injection Operator, Foreman Assistant & Fogging Operator and Storekeeper. • Latest Medical Surveillance conducted 23/01-01/02/2024, Ref No. MS2024/Ladang North Labis/01/JAN/23 with Poliklinik Intan, DOSH No. HQ/08/DOC/00/468 involving 50 workers which involves in spraying, chemical premixing, and workshop operation. Report of the medical surveillance was available for review and no further medical concerns was noted. • The estate completed its Baseline Noise Risk Assessment, Ref. No. NRA22054 on 21-22/10/2022, conducted by an assessor with DOSH registration no. HQ/15/PEB/00/146 for activities such as tractor driver, workshop operator, MTG 	
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		<p>driver, Trunk Injection Driller Operator, Zenoah Blower operator and Knapsack Grass Cutter. Result of the assessment found that all activities were below noise exposure limit and no further action required. Existing control measures such as Personal Hearing Protector with sufficient Noise Reduction Rating (NRR) in addition to annual Hearing Conservation Training shall be maintained.</p> <ul style="list-style-type: none"> • Latest audiometric test was conducted 22/01-16/02/2024, Ref. No. SDNorthLabis/2024/01Jan/22 which involved 42 workers who works among tractor drivers, foreman, machine specialist, MTG driver and Badang drivers. All of them has normal result except for 2 workers who required for further examination by Occupational Health Doctor (OHD) and 3 workers required to take retest of the audiometric test. Medical Examination for the 2 workers has been conducted while retest was conducted on 16/02/2024. As the result, all of them was concluded has Non- Occupational Noise Related Hearing Disorders (Non-ONRHD) and no further medical concern required. 	
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 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 pump application. • Implementation of eSIME+ for monitoring of act and condition in estate and mill. Employees were required to scan available QR code to report any safe condition, safe act, unsafe condition, and unsafe act. Action will be taken for each unsafe act and unsafe condition reported in the system. 	Non-compliance

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		<ul style="list-style-type: none"> • Regular Workplace inspection (every 3 months) was conducted for Guard post, main office, chemical store, road condition-mix area, fertilizer store, scheduled waste store, workshop and diesel tank for each certification unit. For example, at Chaah Estate, latest inspection conducted on 25-26/07/2024, while 14/08/2024 at Chaah POM, 06/08/2024 at Sungai Simpang Kiri Estate and 14/08/2024 for North Labis Estate. • Accident & incident reporting; JKPP 6, JKPP 7 and JKPP 8 • Medical surveillance as conducted annually by operating unit ; 17-18/-5/2024 (Chaah Estate), 09-11/12/2023 at Chaah POM, and 9-17/10/2023 (Sungai Simpang Kiri Estate) and 23/01-01/02/2024 for North Labis Estate • Chemical exposure monitoring by implementation control measure recommended by CHRA assessor every 5 years. • Audiometric test was conducted annually by operating unit; 19/01/2024 and 24/01/2024 (Chaah Estate), 23/10/2023 (Chaah POM), 02/11/2023 for Sungai Simpang Kiri Estate and 22/01-16/02/2024 at North Labis. <p>On the other hand, it was observed that a backhoe operated by a contractor was being used at the FFB ramp station. Upon further inspection and an interview with the operator, it was confirmed that the backhoe had a faulty reverse sensor and a broken horn.</p> <p>Further investigation revealed that the mill had submitted the Pre-start Checklist before starting daily operations via the e-SIME+ system, in accordance with the e-SIME+ System Procedure, Doc. No. UM/HSE/OCP/12, clause 5.2.1. According to clause 5: Procedures and Overview of the e-SIME+ System, any potential to cause harm or injury must be reported via the system. However, the mill failed to detect the faults in the backhoe as required.</p>	
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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 20 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. Interview conducted during onsite audit with a few group of workers has confirmed the understanding and awareness towards each subject discussed on RSPO P&C aspect.</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><u>Chaah Estate</u></p> <ul style="list-style-type: none"> • Fire Drill Training, dated 29/04/2024 • PPE and 10 Golden Rules Training for Harvesting Driver, dated 27/07/2024 • Training on Chemical Handling and Store Management regarding SOP and Cleanliness, dated 17/07/2024 • Training on Hearing Conservation Program, HIRARC Review, WPI Checklist Update Session, dated 24/07/2024 • HIRARC Training, dated 08/03/2024 • SD Guthrie's Sustainability Policies Briefing including Safety Policy, dated 22/02/2024 • First Aid Awareness Training, dated 17/05/2024 • Refresher Briefing on PPE Compliance , SOP Spraying and Manuring, dated 17/05/2024 	Complied

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		<ul style="list-style-type: none"> • Mechanization Upstream Malaysia Assessment, Workshop and Machinery Training, dated 15/03/2024 • Refresher Training on Oil Palm Pal (OPP), Code of Business Conduct (COBC), Grievance Channel, E-sime+ Card, ILO Indicators, Social Dialogue, Sexual Harassment, and Restriction of Movement, dated 06/05/2024 <p><u>Chaah POM</u></p> <ul style="list-style-type: none"> • 10 Safety Golden Rules & PPE Training, dated 01/01/2024 • PPE Enforcement and Buddy System, dated 13/01/2024 • Company Sustainability RSPO Policies Briefing, dated 15/01/2024 • Safety & Health Induction Training, dated 01/02/2024 • Chemical Handling Training, dated 13/05/2024 • Water Sampling Training, dated 14-15/05/2024 • High Conservation Value Awareness Training, dated 26/04/2024 • Grievance Channel Training, dated 25/04/2024 • First Aid Training & Emergency Response Preparedness Training, dated 23/05/2024 • HSE Training and Refresher Briefing Hazard, date 11/06/2024 • Fire Drill Training, dated 13/07/2024 • Golden Rules Working at Height and Confined Space, dated 01/08/2024 • Sexual Harassment Awareness Training, dated 25/06/2024 <p><u>Sungai Simpang Kiri Estate</u></p>	
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		<ul style="list-style-type: none"> • Refresher Training for PPE Usage, Chemical Handling, Scheduled Waste Management, and Safety Data Sheet Availability, dated 15/07/2024 • Briefing on Safety Policy, Safety Committee and Responsibility, dated 18/03/2024 • PPE Training & 10 Safety Golden Rules, dated 01/06/2024 • Chemical Handling Training, dated 14/02/2024 • CHRA recommendation Briefing, dated 27/06/2024 • Preventive Maintenance Vehicle & Safe Driving Technique, dated 25/07/2024 • Briefing on Minimum Wages, Wages Codes Glossary, Payslip, Handheld Recording of Productivity Date of Worker, dated 28/03/2024 • Notification of Accident and Dangerous Occurrence – Rapid 4, dated 13/06/2024 • Training on Grievance Channel and Oil Palm Pal (OPP), dated 25/03/2024 • Briefing on Code of Business Conduct (COBC), RSPO and MSPO Commitment, dated 20/02/2024B • Briefing and Signing of Acknowledgement of Machine Operator, dated 05/03/2024 • Training on Safe Fogging Procedure, dated 10/06/2024 • Hearing Conservation Training, dated 17/05/2024 <p><u>North Labis Estate</u></p> <ul style="list-style-type: none"> • Emergency Response & Fire Drill Training, dated 24/07/2024 • Fire Extinguisher Training, dated 10/05/2024 	
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		<ul style="list-style-type: none"> • Briefing on Wages Structure in Payslip, Wage Calculation, Wage Code Glossary, Annual Leave Payment and Public Holiday Allocation, dated 10/05/2024 • Nursery Training, dated 01/07/2024 • HIRARC Review & Training, date 08/06/2024 • Hearing Conservation Programme, dated 15/05/2024 • Briefing Safety Work Procedure for Chemical Handlers, dated 23/04/2024 • Briefing on Oil Palm Pal (OPP), PPE, 10 Golden Rules, and Take 5, dated 24/04/2024 • Briefing on RSPO, MSPO and ILO requirement, dated 07/05/2024 • Briefing on Grievance Channel, dated 24/04/2024 • Refresher Briefing on Crop Quality, Loose Fruit, and Harvester Productivity, and E-Sime+ Implementation, dated 22/03/2024 • Workshop Management Training, dated 13/03/2024 <p><u>Chaah POM:</u> Company Policy Training (18/04/2024); Code of Business Conduct (06/06/2024); ILO Refresher (02/08/2024); Human Right Charter (10/06/2024); Social/Gender Related Awareness (18/05/2024)</p> <p><u>Chaah Estate:</u> Company Policies & Charter Training (Sustainability, Safety and Health), Human Right Defender Policies, Human Right Charter (14/05/2024)</p> <p>Payslip, Overtime, Oil Palm Pal (OPP), Code of Business Conduct (COBC), Grievance Channel, e-Sime Card, ILO Indicators, Social</p>	
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		<p>Dialogue, Sexual Harassment, Passport Safekeeping, and Restriction of Movement.</p> <p><u>Sungai Simpang Kiri Estate</u> Gender-based Violence Workshop (28/05/2024); Sexual Harassment & Reproductive Rights (21/03/2024); Sustainability, Safety & Health, Human Right Defender policies, and Human Right Charter (20/05/2024); Freedom of Movement (27/04/2024); Complaint & Grievance procedures (13/01/2024); Housing Management & OPP System (14/05/2024)</p> <p><u>North Labis Estate:</u> Training on ILO Indicator (16/04/2024); HSE Townhall – Company policies, Human Right Charter, Golden Rules (28/05/2024); Sexual Harassment (10/05/2024); Wage Structure in Payslip (10/05/2024)</p>	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Training conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by Regional Sustainability & Quality Management (RSQM) personnel, attended Chaah Mill Manager, Assistant Mill Manager, Lab Supervisor, Lab Despatch Operator, Weighbridge Clerk and Auxiliary Police on 13/02/2024. Interview with the said operator has confirmed on their understanding specific and relevant to the task performed.</p>	Complied
<p>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)</p>			
3.8.1	Identity Preserved Module	Refer Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 02, dated January 2024 under section Glossary	Complied

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	<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 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.</p>	<p>stated the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user uniquely identifiable to a single RSPO certified supply base. Refer document no. SDP/GSD/202401/SCCS. FFB were obtained from all SD Guthrie's certified estates only. There was no third party's crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill.</p>			
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 mill does not have any intention to accept and process any non-certified FFB, CPO or PK. All the FFB are supplied by its own certified supply base or other SD Guthrie's certified estates on ad hoc basis. Thus, the palm oil content of its products is 100% IP-certified. It does not imply that the mill has the capacity to receive non-certified FFB and produce MB module CPO/PK and IP module CPO/PK separately</p>	Complied		
3.8.3	<p>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.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date is reported in the summary in Table 7 and Table 10.</p>	Complied		
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>The registration of PalmTrace will be carried out by the Global Trading Department in HQ. Company has registered in PalmTrace system as follows:</p> <table><tr><td>Member name</td><td>Chaah Oil Mill</td></tr></table>	Member name	Chaah Oil Mill	Complied
Member name	Chaah Oil Mill				

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		<table><tr><td>Palm Trace ID</td><td>RSPO_PO1000000190</td></tr><tr><td>Membership No</td><td>1-0008-04-000-00 (SD Guthrie Berhad formerly known as Sime Darby Plantation Berhad)</td></tr><tr><td>Type of business</td><td>Oil mill</td></tr><tr><td>Licence status</td><td>Active (2/07/2024-17/11/2024)</td></tr><tr><td>SCCS Model</td><td>IP , MB</td></tr></table>	Palm Trace ID	RSPO_PO1000000190	Membership No	1-0008-04-000-00 (SD Guthrie Berhad formerly known as Sime Darby Plantation Berhad)	Type of business	Oil mill	Licence status	Active (2/07/2024-17/11/2024)	SCCS Model	IP , MB	
Palm Trace ID	RSPO_PO1000000190												
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Licence status	Active (2/07/2024-17/11/2024)												
SCCS Model	IP , MB												
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none">a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.	<p>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <ul style="list-style-type: none">a) Refer Sustainable Supply chain and Traceability Procedure dated January 2024 with reference number SDP/GSD/202401/SCCS.b) Complete and up to date records and reports in relation to RSPO SCCS were maintained and available for verification. Among the records available were Mass Balance Sheet, Internal Audit Reports, and SCCS Training records.c) Mill have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated in Sustainable Supply chain and Traceability Procedure dated January 2024 Section 4.0 Responsibilities. <p>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. Section 9.2, 10.8, Appendix 2 – inclusion of new clauses under process monitoring, product dispatch and Rules for</p>	Complied										

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		FFB diversion to reflect the inclusion of RSPO IP mills with RSPO MB supply chain as scope extension.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Addressed in Sustainable Supply Chain and Traceability Procedure, version no:2 approved on January 2024 (SDP/GSD/202401/SCCS) under section 18.0 Internal Audit procedure. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Additional procedure for internal audit process ref, SDP/GSD/SCU/IAP, rev:3 dated 31/01/23 was recently developed as guidance procedure for internal audit.</p> <p>Combined internal audit for supply chain was last conducted on 5/06/2024 by 4 internal auditors from Group Sustainability Department. No finding raised with regards to internal audit recorded.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The accompanying documents of incoming FFB from own estate are estate's weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number. Sample of weighbridge ticket checked:</p> <p>WB ticket Number: 5784, Estate's DO: 63084 Supplier: E105 – Chaah Estate Date of delivery: 27/07/2024 Weight/truck/field/bunches: 9.09mt/JRU7281/2000B/472 RSPO certificate no.: RSPO 548299</p>	Complied

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		<p>WB ticket Number: 189534, Estate's DO: 37743 Supplier: E134 – North Labis Estate Date of delivery: 27/07/2024 Weight/truck/field/bunches: 11.07mt/JPS2231/2013A,2019A,2019B/945 RSPO certificate no.: RSPO 548299</p> <p>WB ticket Number: 27247, Estate's DO: 27247 Supplier: E543 – Sg Simpang Kiri Estate Date of delivery: 27/07/2024 Weight/truck/field/bunches: 11.42mt/JRE9500/2005/686 RSPO certificate no.: RSPO 548299</p> <p>Diversion from other RSPO certified estate; WB ticket Number: 20006, Estate's DO: 205875 Supplier: E250 – Yong Peng Estate Date of delivery: 23/07/2024 Weight/truck/field/bunches: 12.13 mt/JRD693/2002G&F/656 RSPO certificate no.: CU-RSPO-863078</p> <p>ii) There has been no projected overproduction during the period under reviewed. Nonetheless, based on interview with the staff, the facility is aware of this requirement.</p>	
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		iii) Handling of non-conforming FFB and/or documents is addressed in the Sustainable Supply Chain and Traceability Procedure, SD/SDP/GSD/SCCS/202401/SCCS, version:02 dated January 2024 under 11.0 non-conforming products and Document.	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>Chaah POM ensured the required information is available in document form. Based on sampled contracts [i.e., S/PSD/2406/CPO0009H the following information was available:</p> <ul style="list-style-type: none"> The name and address of the buyer – confidential The name and address of the seller – KKS Chaah The loading or shipment/ delivery date: June 2024 The date on which the documents were issued, 26/06/2024, dispatch ticket no. 012761 A description of the product, including the applicable supply chain model, e.g., "CPO RSPO IP The quantity of the products delivered: 39.13 mt Related transport documentation, e.g., dispatch ticket no. 9872 Supply chain certificate number of the seller: RSPO 548299 A unique identification number – TR-584ac609-010f <p>Pk despatch, contract ref: S/PSD/2405/PK0031, S/PSD/2406/PK0037</p> <ul style="list-style-type: none"> The name and address of the buyer – confidential The name and address of the seller – KKS Chaah The loading or shipment/ delivery date: May 2024 The date on which the documents were issued, 31/05/2024 A description of the product, including the applicable supply chain model, e.g., PK RSPO IP" The quantity of the products delivered: 39.90 mt Related transport documentation, e.g., dispatch ticket no. 012716 	Complied

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		<ul style="list-style-type: none"> • Supply chain certificate number of the seller: RSPO 548299 • A unique identification numbers – TR-521ee8ba-362b 	
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>No FFB and/or oil palm products processing outsource by Chaah POM except for CPO delivery transportation only. The mill adapted SD Guthrie's established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability Procedure, doc. ID: SD/SDP/GSD/SCCS/202401/SCCS, version:02 dated January 2024 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>The list of outsourced contractors was registered in List of Stakeholder records that CPO transporter as per sighted contract agreement as following:</p> <p>SXXXXXX WXXXXX (M) Sdn Bhd; Transportation of Crude Palm Oil ("CPO") (Service) for SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad's Peninsular Malaysia's Oil Mills – Letter of Extension (LOE); dated: 23/02/24; Contract period valid from 1/12/2023 – 31/10/2024.</p> <p>Process to ensure the independent third parties transporter complies with complies with relevant requirements of this RSPO Supply Chain Certification was not effectively demonstrated. Based on information given from the mill personnel, SDO (KCP) will arrange the transport for despatch. Based on the LOA, SD Guthrie</p>	Non-compliance

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		<p>Berhad (formerly known as Sime Darby Plantation Berhad), group procurement has issued a contract/LOA with transporter (Sxx Mxxx) and found to be expired on 31st March 2024, refer to contract dated 26/7/2021, ref: T/H_SDPB/0721/001. A valid legal contract/LOA was not able to be verified at the point of assessment. Hence, a major NC was issued.</p> <p>SD Guthrie's has issued Memorandum to all contractors dated 26/6/2019. In the memorandum stated the contractors must comply as follows.</p> <ol style="list-style-type: none">1. Comply with local legal requirements.2. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company3. Having signed and enforceable agreement with the company4. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary5. Having related working permits6. Ensure PPE utilization by contractors' employee while being in the company premise <p>The Letter of Award is used as the documented control system that states all procedures and processes which is bound by the contractor.</p> <p>Stated under section 5(d)(iii), 'permit the CB appointed by the company to conduct audit on its or its sub-contractors' operations and provide access to all relevant systems, documents and records when requested by the CB.</p>	
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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>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>Addressed in the Sustainable Supply chain and Traceability Procedure dated January 2024 Section 5.0 Control Of Documents & Records.</p> <p>Chaah POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p> <p>As per the RSPO Supply Chain – Module: Identity Preserved (IP) procedure, the records retention for RSPO Supply Chain related records and reports to be retained for a minimum of 3 years' period. Sampled records of FFB weighbridge tickets and daily production records for last 3 years were still in place for verification.</p> <p>i. All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible.</p>	Complied

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	<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>ii. The retention period for maintaining the traceability records is 3 years as stated in the Sustainable Supply chain and Traceability Procedure dated January 2024 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, produced and closing) and transferred CPO (mill weight, refinery weight).</p> <p>iv. For mass balance, the below explained the inclusion of MB in the certification scope;</p> <p>The mill does not have any intention to accept and process any non-certified FFB, CPO or PK. All the FFB are supplied by its own certified supply base or other SD Guthrie's certified estates on ad hoc basis. Thus, the palm oil content of its products is 100% IP-certified. The extension of scope assessment has been completed so that the mill can classify and sell its IP-certified CPO or PK as MB-certified. It does not imply that the mill has the capacity to receive non-certified FFB and produce MB module CPO/PK and IP module CPO/PK separately. This has been addressed in the latest SD Guthrie Berhad's supply chain procedure mentioned in Indicator 3.8.5, Section 9.2 (ii), which reads:</p> <p style="padding-left: 20px;">"The scope extension of RSPO IP Mills to include RSPO MB Supply Chain is mainly to enable the sales of products through the RSPO MB option.</p> <p style="padding-left: 20px;">For RSPO IP Mills with RSPO MB scope extension, the mills to refer to the requirements of RSPO IP in this procedure.",</p> <p style="padding-left: 20px;">in Section 10.8, which reads:</p>	
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		<p>"For contract allocation, declassification/downgrading shall only be in the following order:</p> <ul style="list-style-type: none"> i. RSPO: Identity Preserved → Segregation → Mass Balance → Non-certified <p>Sales of products by GT (Global Trading) will be in accordance to the certified modules of supply chain as stated in the RSPO and/or MSPO certificates.",</p> <p>and in Appendix 2, which reads:</p> <p><u>"For RSPO-certified Mills</u></p> <ul style="list-style-type: none"> i. If a mill is Identity Preserved, it shall only receive FFB from RSPO certified sources. ii. For Mills that are MB certified, they can receive FFB from both certified and non-certified estates. No separation required provided records of FFB volume processed, CPO produced and dispatched are maintained. <p>*For Mills with RSPO IP and MB Supply Chains (as scope extension), refer to requirements for RSPO IP Mills."</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. As for the last review period, extraction rate recorded as;</p> <p>CPO: 19.88 %</p> <p>KER: 5.0%</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</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</p>	<p>Based on the announcement summary, all the registrations were found to be in order. RSPO certified volume only sold as RSPO certified or as conventional. No RSPO volume sold for other</p>	Complied

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	palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	scheme. Refer Sustainable Supply chain and Traceability Procedure dated January 2024. From the record verification no outsider FFB accepted in Chaah POM. The FFB source only from supply base and under parent company which is also certified estates.	
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>	The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. RSPO certified volumes sold under different scheme or as conventional were registered in the RSPO PalmTrace.	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) also has highlighted its RSPO membership and its commitment to the objectives and principles of RSPO via Sime Darby Plantation's (SDP) 2023 Sustainability Report:</p> <p>https://www.sdguthrie.com/wp-content/uploads/2024/05/Sime-Darby-Plantation-Sustainability-Report-2023-1.pdf</p> <p>which stated "SDP was a founding member of the Roundtable on Sustainable Palm Oil (RSPO) in 2004. We started working towards 100% RSPO certification across our operations in 2008, making sustainable, ethically sourced palm oil our rallying cry."</p>	Complied

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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>In the Sime Darby Plantation's (SDP) 2023 Sustainability Report (https://www.sdguthrie.com/wp-content/uploads/2024/05/Sime-Darby-Plantation-Sustainability-Report-2023-1.pdf), SDP 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 formerly known as Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, in the corporate communications, no usage of RSPO Trademark License.</p>	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	No RSPO corporate logo used by SD Guthrie Berhad.	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.	No misleading statement made by the company as verified on the website	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." 	No misleading statement made by the company as verified on the website	Complied

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

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	displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.		
5.1.2	Product-specific communications are voluntary.	No product specific communications made about an individual product that contains RSPO certified sustainable palm oil made by SD Guthrie Berhad	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.	No RSPO label displayed for product-specific communications made by Chaah POM	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.	No RSPO label displayed for product-specific communications made by Chaah POM	Complied
5.1.5	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 	Not applicable. Chaah POM is not producing end products which involve retailers, traders or distributors.	Not Applicable
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit	Not applicable. Chaah POM is not producing end products which involve retailers, traders or distributors.	Not Applicable

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	shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain		
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	No off-pack claim made in any 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.	Complied
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	If there is any physical RSPO claim, Shipping documentation will be verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e. product/commodity with SCC model (CPO/Palm Kernel RSPO IP/MB) and RSPO certificate number.	Complied
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. 	Chaah POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

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	<ul style="list-style-type: none"> If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 		
5.3 On pack claims			
5.3.1	<p>Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.</p>	Not applicable as no on pack claims made by Chaah POM	Not Applicable
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> RSPO IP/SG CERTIFIED* Contains RSPO IP/SG palm oil* Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on pack claims made by Chaah POM	Not Applicable
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> RSPO MIXED* Contributes to the production of RSPO certified palm oil* Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on pack claims made by Chaah POM	Not Applicable
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> RSPO 50% MIXED* Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on pack claims made by Chaah POM	Not Applicable

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	D) For Products covered with Book and Claim (B&C): <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* *Add RSPO TM Licence Number below or next to the claim.	Not applicable as no on pack claims made by Chaah POM	Not Applicable
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	Not applicable as no on pack claims made by Chaah POM	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Not applicable as no on pack claims made by Chaah POM	Not Applicable
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	Not applicable as no on pack claims made by Chaah POM	Not Applicable
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	Not applicable as no on pack claims made by Chaah POM	Not Applicable
MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
	If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied
Messaging			
	Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements: <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 	No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Chaah POM is producing crude palm product and	Not Applicable

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	<ul style="list-style-type: none"> 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 	does not involve in any labelling of end product. Therefore, this indicator is Not Applicable	
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> RSPO Trademark that includes the tag "CERTIFIED"; or RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Chaah POM is producing crude palm product and does not involve in any labelling of end product. Therefore, this indicator is Not Applicable	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	Oil palm content is 100% CPO and claim as RSPO MB-certified from IP certified portion	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.	No non-certified FFB comes from external crop and since Chaah POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
Messaging			

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	<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. 	<p>Chaah POM has not made any product-specific communications in any RSPO MB product claims.</p>	<p>Complied</p>
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	<p>Chaah POM has not made any product-specific communications in any RSPO MB product claims</p>	<p>Complied</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 (formerly known as Sime Darby Plantation Berhad) established the Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020. Under section 3.2.1 of HRC stated that the company's commitment on eradicating any form of exploitation, forced or</p>	<p>Complied</p>

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		<p>bonded labour, slavery, human trafficking, and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. Furthermore, the company is committed to provide decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs.</p> <p>Aside the above, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. SD Guthrie Berhad respect and safeguard human rights, nation of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SD Guthrie Berhad. This policy is applied to all stakeholders affected by the business activities and relationships including directors, employees, counterparties, business partners, workers in our operations and supply chains, and communities surrounding our operations.</p> <p>All the above policies were communicated to the employees during induction training for new employees and morning muster. While for external stakeholder, the policies were communicated during stakeholder meeting as below:</p> <ul style="list-style-type: none">• Chaah POM, Chaah Estate & Sg. Simpang Kiri Estate: Stakeholders Consultation Meeting conducted on 17/01/2024 at Chaah Estate Community Hall.• North Labis Estate: A separate stakeholders consultation meeting was conducted on 26/04/2024.	
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		<p>Reflecting to the above, feedback received from stakeholders' consultation conducted during the audit with sampled workers and several external stakeholders found, there is no issue raised related to the human right at each visited operating unit. During the interview with some of the workers (both local and migrant), they mentioned that they were aware of such policy and commitments by company even though they are not able to remember it word by word but is reflected in their working environment and the management always remind about it during morning muster and other training or meeting. They also provided with training and reminded during morning muster.</p> <p>While interviewed with sampled contractors, it was informed that operating units under SOU 20 UoC were monitors the contractors' compliance with the VCOBC especially on the Labour & Human Rights, Health & Safety and the company's best practices. The contractors need to provide all details of their workers including payslip, employment contract and PPE record to the management. Monitoring documents were reviewed, which are checked on a monthly basis by each operating unit as follows:</p> <ul style="list-style-type: none"> • Contractor Key Performance Indicator (KPI) Evaluation • Checklist of Contractor and Vendor 	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad prohibits any form of violence or harassment in their operation as per the above-mentioned policies. Based on interview with sampled workers and gender committee representatives, there has been no case reported with regards to violence and harassment. No harsh or insulting words are in used for giving orders to do the operation tasks, have been reported by workers. Most of the workers gave feedback that they are comfortable working at SOU 20 UoC. The workers also mentioned that the management has treated them well in their working</p>	Complied

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		environment. 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.	
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad has established procedure for complaint and grievance which is open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>Procedure for complaint and grievance has been established and documented in Grievance Response Standard Operating Procedure dated 18/07/2022. The procedure specified that several methods to make any complaint such as whistleblowing, workers helpline, Suara Kami helpline, informal grievances received at operating unit level through Region HR, careline or gender representative and through email that will be handle by Grievance units. For Suara Kami platform it was guided with the procedure entitled Standard Operating Procedure of Suara Kami Helpline dated 15/04/2022.</p> <p>The above established mechanism is able to resolve the disputes in a timely manner. As per specified in the procedure, the allocated timeframe to resolve the disputes are based on case classification as outlined in the section 3.1.4 and 3.3 of Standard Operating Procedure of Suara Kami and Grievance Response Standard Operating Procedure, respectively. Typically, disputes for non-urgent issue or cases will resolve within 14 working days upon receipt. Furthermore, SD Guthrie Berhad has also developed system to handled social issues, which include:</p> <ol style="list-style-type: none"> 1. Social dialogue tool kit 	Complied

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		<p>This session is about management and workers engagement between representative of workers, and employer (operating unit management) to resolve workplace and living condition issues through social dialogue. This dialogue frequency will be done every once a month. The issues that been raised during this dialogue will be recorded under a tracker. This tracker will be captured in the dashboard and available to RGM and RCEO</p> <p>2. Oil Palm Pal (OPP)</p> <p>This OPP is a digitalized data management, used to capture all complaint/request for repair of workers houses and monitor progress of repair works till completion.</p> <p>It was observed that for the complaints against the top management of the estate/mill or complaint from internal and external parties, such process shall be covered within the whistleblowing channel i.e., Whistleblowing Charter Framework dated 11/2023 (https://www.sdguthrie.com/who-we-are/corporate-governance/report-your-concerns/). Whistleblowing channel which is established as a channel for managing a reported complaint through a secure and accessible whistleblowing channel, transparent investigation and provide protection.</p> <p>Verification on the Suara Kami report, OPP report and issues raised in Social Dialogue at each visited operating unit, it was found that the complaint and grievance were attended to in a timely manner as per specified in the procedure. Interview conducted with sampled of workers including workers representative from different countries indicated that management of each visited operating unit has acted on reported grievance cases. The workers also know the purpose of Suara Kami, OPP, Social Dialogue and whistleblowing channel and found that the contact number/hotline number were displayed at</p>	
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		their house. For OPP they can scan the QR code using each individual worker's mobile phone.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	<p>The procedure as mentioned in the indicator 4.2.1 has been briefed and trained to staff and the workers. The same procedure has been briefed to the newly employed workers during induction course. Evidence of the training and briefing conducted are made available for verification during the audit. Observed that the policy is posted on the notice wall at the workers housing.</p> <p>Furthermore, the level of the understanding for the workers on the policy and procedure relating to protection of whistle-blowers and complainant is sufficient whereby the workers are able to properly demonstrate the procedure as verified during interview with several workers consists of Malaysian, Indonesian, Bangladeshi, Nepalese, and Indian workers. There are no illiterate parties has been identified for each operating units. For stakeholders, it was found that they can demonstrates their understanding on the complaint mechanism in the procedure as verified during stakeholder consultation.</p>	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	SD Guthrie Berhad has developed its own online complaint platform called Oil Palm Pal (OPP) for workers to utilized using their smartphones. The complaints 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. A meeting call Social Dialogue Meeting is also conducted once a month between the management and the workers representatives. When interviewed, the workers found to be very well versed in explaining how to use the OPP. 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	Complied

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		<p>sampled issues and interview with workers confirmed that all the complaints/grievances were acted upon on timely manner.</p> <p>Sighted record maintained by the management for channel:</p> <p>(1) Suara Kami: 6 cases recorded at SOU 20 UoC, which all remark as completed.</p> <p>(2) OPP:</p> <ul style="list-style-type: none"> • Chaah POM reported 12 cases via OPP in July 2024, with most cases settled within the same day and at most within 3 days. Communication records with complainants, including their signatures, confirm that the issues were resolved. • Chaah Estate reported 21 cases via OPP in July 2024, with most cases settled within the same day and at most within 3 days. Communication records with complainants, including their signatures, confirm that the issues were resolved. • Sungai Simpang Kiri Estate reported 39 cases via OPP in July 2024, with most cases settled within the same day and at most within 3 days. Communication records with complainants, including their signatures, confirm that the issues were resolved. • North Labis Estate reported 25 cases via OPP in July 2024, with most cases settled within the same day and at most within 3 days. Communication records with complainants, including their signatures, confirm that the issues were resolved. 	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to	Reflecting to finding in indicators above, the management unit did recognize rights for the complainants to access independent legal and technical advice. Based on the interview with the workers, there	Complied

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	<p>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>are aware they can seek independent legal and technical advice from third party mediator such as embassy, labour department and other government agencies.</p> <p>As mentioned in Grievances Response Standard Operating Procedure dated 18/07/2022, the negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>All operating units within SOU 20 UoC are dedicated to contributing to local development in close consultation with local communities. During the audit, it was verified that contributions to community development are conducted on a case-by-case basis, following stakeholder meetings where community needs are discussed. Upon receiving such requests, further clarification and details are sought, and the requests are subject to management approval. Once approved, stakeholders are informed, and the contributions are executed accordingly.</p> <p>Based on records and stakeholder consultations conducted during the audit, the audit team has verified the contributions to community development made by the operating units under SOU 20 UoC. Examples include:</p> <ul style="list-style-type: none"> Flood Relief: Contributions were made to 32 mill workers affected by floods on 29/01/2024. 	Complied

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		<ul style="list-style-type: none"> Community Event: All workers participated in a communal activity in celebration of Maulidur Rasul on 28/09/2023. Community Celebration: On 18/11/2023, a formal request (Ref. NO. (01)dIm.KKP/MK17/SS/11-23) was made by Ketua Kampung Haji Kamisan for contributions towards a thanksgiving event for the inauguration of a new road. The management approved a cash donation for this purpose on 06/12/2023. School Facility Upgrade: The Parent-Teacher Association of SMK Seri Bali requested (Ref. No. JEA7043.31/100-23/2/14) on 05/01/2024 for contributions to upgrade the surau facilities at SMK Seri Bali. The management approved a cash donation for this purpose on 22/01/2024. Health Screening: On 15/07/2024, the Batu Pahat District Health Office requested the use of the estate hall for malaria and filariasis screening on 22-23/07/2024. The estate management also informed all workers to participate in the screening. The program was successfully conducted, with all workers screened. Religious Facility Support: A cash donation was made on 10/10/2023 to Surau Al-Hidayah in Kampung Haji Kamisan for the construction of a vehicle garage. 	
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 20 UoC has demonstrated clear evidence of legal ownership of its lands through the possession of land title documents. The details are as follows:</p> <p><u>Chaah Estate</u></p> <ul style="list-style-type: none"> Land Title No. H.S.(D): 7745 <ul style="list-style-type: none"> Area: 1,991.0502 hectares 	Complied

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		<ul style="list-style-type: none"> ○ Plot No.: PTD 2378 ○ Location: Mukim Chaah Bahru, Batu Pahat, Johor ○ Lease Duration: 99 years, ending on 22/12/2077 ○ Land Use Category: Agriculture ○ Allocation: 5.162 hectares allocated for Chaah POM • Land Title No. H.S.(D): 7746 <ul style="list-style-type: none"> ○ Area: 804.3114 hectares ○ Plot No.: PTD 2379 ○ Location: Mukim Chaah Bahru, Batu Pahat, Johor ○ Lease Duration: 99 years, ending on 22/12/2077 ○ Land Use Category: Agriculture <p><u>Sungai Simpang Kiri Estate</u></p> <ul style="list-style-type: none"> • Land Title No. H.S.(D): 7747 <ul style="list-style-type: none"> ○ Area: 1,538.0053 hectares ○ Plot No.: PTD 2379A ○ Location: Mukim Chaah Bahru, Batu Pahat, Johor ○ Lease Duration: 99 years, ending on 22/12/2077 ○ Land Use Category: Agriculture • Land Title No. H.S.(D): 14358 <ul style="list-style-type: none"> ○ Area: 183.3223 hectares ○ Plot No.: PTD 2645 ○ Location: Mukim Chaah Bahru, Batu Pahat, Johor ○ Lease Duration: 99 years, ending on 20/03/2081 ○ Land Use Category: Agriculture • Land Title No. H.S.(D): 14359 	
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		<ul style="list-style-type: none"> ○ Area: 105.6228 hectares ○ Plot No.: PTD 2650 ○ Location: Mukim Chaah Bahru, Batu Pahat, Johor ○ Lease Duration: 99 years, ending on 20/03/2081 ○ Land Use Category: Agriculture • Land Title No. H.S.(D): 14360 <ul style="list-style-type: none"> ○ Area: 203.1519 hectares ○ Plot No.: PTD 3077 ○ Location: Mukim Chaah Bahru, Batu Pahat, Johor ○ Lease Duration: 99 years, ending on 20/03/2081 ○ Land Use Category: Agriculture • Land Title No. H.S.(D): 14361 <ul style="list-style-type: none"> ○ Area: 341.5541 hectares ○ Plot No.: PTD 3078 ○ Location: Mukim Chaah Bahru, Batu Pahat, Johor ○ Lease Duration: 99 years, ending on 20/03/2081 ○ Land Use Category: Agriculture <p><u>North Labis Estate</u></p> <p>There are 14 land titles for North Labis Estate. Samples are as follows:</p> <ul style="list-style-type: none"> • Land Title No. Hakmilik: 37627 <ul style="list-style-type: none"> ○ Area: 11.17 hectares ○ Lot No.: Lot 8250 ○ Location: Mukim Labis, Segamat, Johor ○ Ownership: Freehold 	
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		<ul style="list-style-type: none"> ○ Acquisition: 0.0654 hectares acquired for the Jalan Gemas – Ayer Hitam upgrade project • Land Title No. H.S.(D): 58566 <ul style="list-style-type: none"> ○ Area: 1,943.364 hectares ○ Plot No.: PTD 18091 ○ Location: Mukim Labis, Segamat, Johor ○ Ownership: Freehold ○ Land Use Category: Agriculture ○ Acquisition: 8.5515 hectares acquired for Army Regimental Expansion (endorsed) and 0.304 hectares for the Ladang Sg. Muar temple site • Land Title No. H.S.(M): 317 <ul style="list-style-type: none"> ○ Area: 0.8675 hectares ○ Plot No.: MLO 1643 ○ Location: Mukim Labis, Segamat, Johor ○ Ownership: Freehold ○ Land Use Category: Agriculture • Land Title No. Hakmilik: 88289 <ul style="list-style-type: none"> ○ Area: 196.1783 hectares ○ Lot No.: Lot 693 ○ Location: Mukim Labis, Segamat, Johor ○ Ownership: Freehold • Land Title No. Hakmilik: 81344 <ul style="list-style-type: none"> ○ Area: 225.511 hectares ○ Lot No.: Lot 628 ○ Location: Mukim Labis, Segamat, Johor 	
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		<ul style="list-style-type: none"> ○ Ownership: Freehold ○ Acquisition: 0.6012 hectares acquired for the 500 kV transmission line project from PMU Yong Peng East to PMU Lenggeng • Land Title No. Hakmilik: 105386 <ul style="list-style-type: none"> ○ Area: 268.7108 hectares ○ Lot No.: Lot 396 ○ Location: Mukim Labis, Segamat, Johor ○ Ownership: Freehold ○ Acquisition: 7.7021 hectares acquired for the 500 kV transmission line project from PMU Yong Peng East to PMU Lenggeng <p>No land issues related to the loss of legal customary rights with indigenous peoples, local communities, and other stakeholders were reported during the audit, as confirmed through interviews with local communities.</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>In order to deal with future arising land dispute (if any), SD Guthrie Berhad established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.</p>	Complied

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4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>In order to deal with future arising land dispute (if any), SD Guthrie Berhad established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.</p>	Complied
4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>SD Guthrie Berhad has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.</p>	Complied
4.4.2c	<p>Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>SD Guthrie Berhad has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating</p>	Complied

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		environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.	
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 is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land. In order to deal with future arising land dispute (if any), SD Guthrie Berhad established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.	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 is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land. In order to deal with future arising land dispute (if any), SD Guthrie Berhad established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land. In order to deal with future arising land dispute (if any), SD Guthrie Berhad established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed,	Complied

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		communication, consultation and complaints from external stakeholders.	
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 -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 20 UoC. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SD Guthrie Berhad. Therefore, community representation through institutions of their own choosing cannot be further assessed.	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 -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 20 UoC. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SD Guthrie Berhad. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.	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 -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 20 UoC. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SD Guthrie Berhad. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.	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 -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 20 UoC. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SD Guthrie Berhad. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 20 UoC. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SD Guthrie Berhad. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 20 UoC. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SD Guthrie Berhad. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.	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 -	There is no evidence of any land acquired for plantations or mill after 15 November 2018 within SOU 20 UoC.	Complied

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4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no evidence of any new lands acquired in areas inhabited by communities in voluntary isolation.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	SOU 20 UoC is adopting the Flowchart and Procedures on Handling Land Disputes (Version 1, dated 01/11/2008), which was established by the management of SD Guthrie Berhad. The procedure has no changes, and it describes the process on any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	SOU 20 UoC is adopting the Flowchart and Procedures on Handling Land Disputes (Version 1, dated 01/11/2008), which was established by the management of SD Guthrie Berhad. The procedure has no changes, and it describes the process on any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	The absence of reported issues related to the loss of legal customary rights with indigenous peoples, local communities, and other stakeholders is a positive finding during the audit. Additionally, the presence of boundary stones and trenches to	Complied

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		demarcate land boundaries adds a layer of transparency and visibility, contributing to clear delineation and potentially minimizing disputes over land boundaries.	
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	The absence of reported issues related to the loss of legal customary rights with indigenous peoples, local communities, and other stakeholders is a positive finding during the audit. Additionally, the presence of boundary stones and trenches to demarcate land boundaries adds a layer of transparency and visibility, contributing to clear delineation and potentially minimizing disputes over land boundaries.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	SOU 20 UoC is adopting the Flowchart and Procedures on Handling Land Disputes (Version 1, dated 01/11/2008), which was established by the management of SD Guthrie Berhad. The procedure has no changes, and it describes the process on any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.7.2	(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 -	SOU 20 UoC is adopting the Flowchart and Procedures on Handling Land Disputes (Version 1, dated 01/11/2008), which was established by the management of SD Guthrie Berhad. The procedure has no changes, and it describes the process on any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders.	Complied

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		Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	
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 have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area. It was confirmed during interview with local communities where all operating unit under SOU 20 UoC has been planted with oil palm for third cycle.	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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied

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4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	The prices of FFB are determined using the Malaysian Palm Oil Board (MPOB) Monthly Average and the Mill Oil Extraction Rate (OER) & Kernel Extraction Rate (KER). Nevertheless, Chaah POM operates under Identity Preserve Supply Chain Model without the inclusion of smallholders.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Not relevant, since Chaah POM operates under the Identity Preserve Supply Chain Model without the inclusion of smallholders.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Not relevant, since Chaah POM operates under the Identity Preserve Supply Chain Model without the inclusion of smallholders.	Not Applicable
5.1.4	(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. - Critical (Major) compliance -	Not relevant, since Chaah POM operates under the Identity Preserve Supply Chain Model without the inclusion of smallholders.	Not Applicable

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5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Not relevant, since Chaah POM operates under the Identity Preserve Supply Chain Model without the inclusion of smallholders.</p> <p>Chaah POM only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment.</p> <p>However, evidence is available that respective operating unit of the audited UoC deal fairly and transparently with its appointed contractors, suppliers, and service providers. Based on contracts sampled and reviewed during this audit, evidence was available that all contracts are fair, legal, and transparent and have an agreed timeframe. Among others, the contracts detail out clearly the purpose of the contract, rights and obligations of both parties, contract amount and payment terms, specific timeframe, and mutual termination clause. Among the sampled contracts were:</p> <ul style="list-style-type: none"> • Rxxxxxx Axxxx Axxx Txxxxxx: Grasscutting works contractor – contracted for 12 months period (November 2023 – October 2024) • Hxxxxx Exxxxxxxxx: Land Preparation and Related works for Oil Palm Replanting • Pxxxxxxxx Kxxxxxx Sxxxx: FFB Transporter – Letter of Extension dated 20 March 2024, expired on 31/12/2024 • Qxxxxxx Sxxxxxx: Land Preparation and Related works for Oil Palm Replanting • Pxxxxxx Exxx: Construction & Completion of Surau, contracted for 24 weeks (until 01/02/2024) • Rxxxxxxxx Sxxxx: FFB Transporter – valid until 31/12/2024 • Axxxxxxxx: School Children Transporter – valid until 30 April 2025 	Not Applicable
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5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Not relevant, since Chaah POM operates under the Identity Preserve Supply Chain Model without the inclusion of smallholders.</p> <p>Chaah POM only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment.</p> <p>However, evidence is available that respective operating unit of the audited UoC made agreed payments in timely manner. The demonstration that agreed payment were made in timely manner was confirmed during interview the stakeholder's consultation and the evidence was available that agreed payments were made in a timely manner accompanied by purchase orders, invoices, and payment vouchers. Sighted payment record for sampled contractors at Indicator 5.1.5.</p>	Not Applicable																				
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Chaah POM conducts regular calibration on their weighbridges used to determine the FFB tonnage for all FFB suppliers. There are 2 weighbridges used in the mill and records of yearly calibration for both weighbridges conducted by De Metrology Sdn Bhd were available for verification as below:</p> <table border="1"> <thead> <tr> <th>No</th><th>Details</th><th>Weighbridge 1</th><th>Weighbridge 2</th></tr> </thead> <tbody> <tr> <td>1</td><td>Capacity</td><td>60,000 kg</td><td>60,000 kg</td></tr> <tr> <td>2</td><td>Registration No.</td><td>00883</td><td>01228</td></tr> <tr> <td>3</td><td>Certificate Number</td><td>D 108494</td><td>D 060083</td></tr> <tr> <td>4</td><td>Safety Label Number</td><td>DE18010377</td><td>DE18010313</td></tr> </tbody> </table>	No	Details	Weighbridge 1	Weighbridge 2	1	Capacity	60,000 kg	60,000 kg	2	Registration No.	00883	01228	3	Certificate Number	D 108494	D 060083	4	Safety Label Number	DE18010377	DE18010313	Complied
No	Details	Weighbridge 1	Weighbridge 2																				
1	Capacity	60,000 kg	60,000 kg																				
2	Registration No.	00883	01228																				
3	Certificate Number	D 108494	D 060083																				
4	Safety Label Number	DE18010377	DE18010313																				

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		5	Calibration Date	06/09/2023	06/09/2023	
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 -	Not relevant, since Chaah POM operates under the Identity Preserve Supply Chain Model without the inclusion of smallholders.				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 -	Not relevant, since Chaah POM operates under the Identity Preserve Supply Chain Model without the inclusion of smallholders.				Not Applicable
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.						
5.2.1	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 -	Chaah POM adopted Identity Preserved Supply Chain Module and only processes Fresh Fruit Bunches (FFB) from its SOU 20 group which are Chaah Estate, Sungai Simpang Kiri Estate and North Labis. There are no smallholders in its supply base				Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Chaah POM adopted Identity Preserved Supply Chain Module and only processes Fresh Fruit Bunches (FFB) from its SOU 20 group which are Chaah Estate, Sungai Simpang Kiri Estate and North Labis. There are no smallholders in its supply base				Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Chaah POM adopted Identity Preserved Supply Chain Module and only processes Fresh Fruit Bunches (FFB) from its SOU 20 group which are Chaah Estate, Sungai Simpang Kiri Estate and North Labis. There are no smallholders in its supply base				Complied

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5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Chaah POM adopted Identity Preserved Supply Chain Module and only processes Fresh Fruit Bunches (FFB) from its SOU 20 group which are Chaah Estate, Sungai Simpang Kiri Estate and North Labis. There are no smallholders in its supply base	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Chaah POM adopted Identity Preserved Supply Chain Module and only processes Fresh Fruit Bunches (FFB) from its SOU 20 group which are Chaah Estate, Sungai Simpang Kiri Estate and North Labis. There are no smallholders in its supply base	Complied
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 (formerly known as Sime Darby Plantation Berhad) established Human Rights Charter last revised 2020 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 promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity union membership, political affiliation, or age. The above documents could be downloaded from https://www.sdguthrie.com/wp-content/uploads/2021/12/HRC-2020-1.pdf It was found that the above policies are communicated to all level of workforce via series of training or briefing, besides simplified pictorial flowchart and instruction are displayed at appropriate places, at sampled visited operating unit under SOU20 Chaah. The interviewees, including managerial level, workers, contractors and their workers, local community have given feedback they	Complied

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		<p>understood that the gist of the policies. Based on records of employment and interviews conducted on-site with sampled internal and external stakeholders, it has been confirmed that workers and groups, including local communities, women, and migrant workers, have not been subjected to discrimination. For example, there are mandores who previously work as harvester or general workers, has being promoted based on their talent, working experience and performance. The promotion is applying for all level of workforce.</p> <p>Workers are given space and opportunity to speak up their opinion and willing for any task given, to see whether they are suitable for the allocated task or can shifted to other task.</p> <p>Sampled workers including local and foreign workers also informed that they are equally treated in any ways. Job promotions were opened to all gender and nationality based on their performance, all workers get the same benefits such as rice supply every 2 months, housing facilities, and medical benefits.</p>	
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>	<p>Based on interview with the sampled workers from different gender and nationalities at each visited operating unit under SOU 20 UoC, it was confirmed that there was no discrimination reported and the management of each operating unit has been fair to them. 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. Based on the interview, the promotions were based on their capabilities and discipline at work, for example, there is a female mandore looking after the harvesters which mostly men, and migrant workers appointed as mandore. Another example is foreign workers being as mandore for sprayer gang which consists of both local and foreign workers.</p>	Complied

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6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation 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), (Doc. No.: SDP/HRUM/2020/SOP01, dated 01/01/2020) 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. In sight of the flowchart on career progression for workers level, for example:</p> <ol style="list-style-type: none"> 1. General worker/harvester to mandore level 2. Mandore to Supervisor Level <p>The above procedure also explained the following:</p> <ol style="list-style-type: none"> 1. Criteria and conditions for promotion whereby the job promotion for local and foreign workers will be offered when there are availability of vacancies or new position or additional scope of responsibilities to be undertaken by an individual. 2. Generally to qualify for the promotion the individual should: <ol style="list-style-type: none"> a. served at least 1 year in the same position with the company. Otherwise, a justification from management is required to support the promotion recommendation. b. consistently performed and met his/her work target set. c. no records of misconduct or disciplinary actions taken against him/her for at least last 2 consecutive financial years. d. for promotion to supervisory position, the candidate shall possess a minimum of SPM qualifications or equivalent. <p>Through interviews with sampled workers who were promoted to</p>	Complied
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		<p>their current positions confirmed that the promotion was based on their performance, experience and skill. Some of the interviewed workers started as general workers who were promoted to Mandores.</p> <p>During the interview with the female workers, they mentioned that there is room for them to move around but within the job scope that suitable with their performance and skill.</p>	
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>	<p>Based on interview with medical assistant and sampled female workers at the mill and the estates confirmed that the management has never impose any pregnancy test during their tenure in the operating unit. No requirement for pregnancy test to be conducted in each operating unit under SOU 20 UoC. The test is only carried out by themselves if they assumed to be pregnant. The female workers are aware that they need to inform their superior once they are confirmed pregnant to ensure that they will be assessed to whether they are fit to carry out their current tasks. According to the female workers, they are responsible for their own family planning.</p> <p>Most of the female workers at Chaah POM are not involved in mill operating works, mostly as administration workers in the office, cleaners, and gardener. For estates under SOU 20, there are no female workers involved in tasks exposed to chemical such as spraying and manuring as verified during interview with sampled workers. Female workers are employed as general workers for upkeep activities, mandore, linesweeper and gardener. Once they inform the management that they are pregnant, they will be provided with alternative equivalent employment until the baby reached two years old. If there are any cases of delaying on menstrual, medical assistant will advise the female workers to</p>	Complied

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		conducted test in estate clinics or to nearest government health clinic.	
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender Committee Guidelines (Version No. 02, approved in Jan 2024) is to provide Guideline and outlines the structure, roles and responsibilities of Gender Committee at Operating Units in Upstream Malaysia.</p> <p><u>Article 1 (Scope and Purpose):</u></p> <p>Objectives of the Gender Committee and related programmes are:</p> <ul style="list-style-type: none"> • To raise awareness, identify opportunities and improvements for women welfare and empowerment at work • To address issues concern to create a safe working and living environment within the operating units • To enhance awareness of the workforce related to sexual harassment and gender-based violence • For women to have access to opportunities and resources to improve themselves through training and capacity development programmes <p><u>Article 2 (Structure, Roles and Responsibilities):</u></p> <p>2.1.1 the gender committee (GC) shall be established in the respective Operating Units, The Chair of the GC will be supported by the other committee members comprising secretary, treasurer, and its members.</p> <p><u>Article 3 (Guidelines on Gender Committee Meetings and Activities)</u></p> <p>3.1 meeting frequency minimum of every 3 months.</p>	Complied

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		<p><u>Article 4 (Reporting Sensitive Issues):</u></p> <p>4.1 in the event where the GC Chair or any of the GC members receive complaints/grievances or incidents of sensitive nature such cases to sexual harassment, domestic abuse and children in the OU, GC Chair shall report to the OU Manager directly for his next actions to report to the Regional HR Manager. GC Chair or members are not allowed and not responsible to investigate the claims.</p> <p>Each operating unit under SOU 20 UoC has its own Gender Committee. The objectives of these committees are to address issues related to female workers' welfare, such as new mothers' needs assessments, sexual harassment concerns, and annual activities for members. Additionally, they aim to create opportunities for female leadership development, promote active participation of women in the workforce, raise awareness, identify and address issues of concern, and explore opportunities for improvements for women. The committees hold regular meetings every three months in accordance with established procedures. Below are the details of the Gender Committees for each operating unit (OU) of the UoC:</p> <p>(1) <u>Chaah POM</u>: The Gender Committee at Chaah POM, comprising a Patron, Secretary, Co-Chairman, Treasurer, and 12 members, was officially appointed by the Mill Manager on March 8, 2024. The committee has held quarterly meetings on 09/02/2024, 09/05/2024, and 17/08/2024. Key topics discussed include a refresher on the Human Rights Charter and organizing activities such as health check-ups for pap smears, jogging, Zumba sessions, and reviving the clubhouse.</p> <p>(2) <u>Chaah Estate</u>: Similarly, the Gender Committee at Chaah Estate, consisting of a Patron, Secretary, Vice Chairman, Treasurer, and 9 members, received their appointment letter from the Estate</p>	
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		<p>Manager, valid until 31/12/2024. Their quarterly meetings for 2024 were conducted on 07/03/2024 and 21/06/2024. Discussions mirrored those at Chaah POM, focusing on the Human Rights Charter and activities like health check-ups for pap smears, jogging, Zumba, and clubhouse revitalization.</p> <p>(3) <u>Sungai Simpang Kiri Estate</u>: The Gender Committee at Sungai Simpang Kiri Estate, which includes a Patron, Secretary, Vice Chairman, Treasurer, and 3 members, was appointed by the Estate Manager with a term lasting until 31/12/2024. Meetings were held on 03/03/2024 and 04/06/2024. The committee's discussions covered the company's policies on women's and children's rights, gender equality, procedures for handling sexual crimes/harassment, and welfare programs. Activities included a gotong-royong at Surau Al-Hidayah.</p> <p>(4) <u>North Labis Estate</u>: At North Labis Estate, the Gender Committee, comprising a Patron, Chairman, Vice Chairman, Secretary, Treasurer, and 11 members, was appointed by the Estate Manager with a term valid until 01/02/2025. Their meetings for 2024 took place on 12/01/2024, 08/03/2024, and 07/06/2024. The committee discussed the company's policies on women's and children's rights, gender equality, procedures for sexual crimes/harassment, and welfare programs. Activities included health check-ups for pap smears, jogging, and Zumba sessions.</p> <p>Minutes of the meetings were made available for verification. So far, no issues have been raised by female workers regarding discrimination or unfair treatment, as verified from feedback forms and meeting minutes. Based on interviews with the Gender Committee representatives at each visited operating unit, it was</p>	
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		confirmed that there have been no reported cases of sexual harassment or violence.																																				
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	<p>The wage structure in the SOU 20 Chaah follows the Malayan Agricultural Procedures Association (MAPA) rates which also follow the Minimum Wages Order 2022. Each of the job has their own work scope which also included in the contract agreement of the workers. The salary structure is comprised of the total daily rates (based on performance), overtime, and other benefits.</p> <p>For the harvester, the wage structure is based on the MAPA/NUPW rates of pay for harvesting and other criteria which include the height of the oil palm trees. The workers were paid accordingly.</p> <p>Based on the sampled payslips for workers (as per indicator 6.2.3), 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 MAPA/NUPW collective agreements without any form of discrimination. This was also evident through interview with a group of workers sampled. Sighted the payslip for the month of December 2023, April 2024, and July 2024 for the sample of workers for each visited operating units listed as per below:</p> <table><tr><th>Employee No.</th><th>Date of Join</th><th>Gender</th><th>Nationality</th><th>Job Function</th></tr><tr><td colspan="5">Chaah POM</td></tr><tr><td>xx628</td><td>05.09.1997</td><td>Male</td><td>Malaysian</td><td>Driver</td></tr><tr><td>xxx047</td><td>12.12.2020</td><td>Male</td><td>Malaysian</td><td>Oil Room</td></tr><tr><td>xxx652</td><td>01.08.2021</td><td>Female</td><td>Malaysian</td><td>Gardener</td></tr><tr><td>xxx590</td><td>17.01.2023</td><td>Male</td><td>Malaysian</td><td>Lab Attendant</td></tr><tr><td>xxx504</td><td>05.04.2023</td><td>Male</td><td>Malaysian</td><td>General Worker</td></tr></table>	Employee No.	Date of Join	Gender	Nationality	Job Function	Chaah POM					xx628	05.09.1997	Male	Malaysian	Driver	xxx047	12.12.2020	Male	Malaysian	Oil Room	xxx652	01.08.2021	Female	Malaysian	Gardener	xxx590	17.01.2023	Male	Malaysian	Lab Attendant	xxx504	05.04.2023	Male	Malaysian	General Worker	Complied
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		xxx094	01.02.2024	Male	Malaysian	Workshop
		xxx096	12.08.2015	Male	Indian	Pressing Station
		xxx451	12.06.2023	Male	Indonesian	Workshop
		Chaah Estate				
		xxx370	11.3.2014	Female	Malaysian	General Worker
		xxx271	16.1.2023	Male	Malaysian	General Worker
		xxx013	26.10.2015	Male	Indonesian	General Worker
		xxx090	29.08.2016	Male	Indonesian	Field Worker
		xxx120	2.11.2022	Male	Indonesian	MB/MTG Driver
		xxx762	15.11.2022	Male	Indonesian	Pruner
		xxx755	30.12.2022	Male	Indonesian	Loose Fruits Collector
		xxx497	24.2.2023	Male	Indonesian	FFB Harvester
		xxx242	30.05.2018	Male	Nepalese	General Worker
		xxx011	5.2.2018	Male	Indian	FFB Harvester
		xxx441	9.8.2019	Male	Indian	General Worker
		xxx437	13.12.2014	Male	Bangladeshi	Pruner
		Sungai Simpang Kiri Estate				
		xx524	1.1.1985	Female	Malaysian	General Worker
		xxx468	16.5.2016	Male	Malaysian	General Worker
		xxx560	5.4.2022	Male	Malaysian	General Worker
		xxx152	2.1.2023	Female	Malaysian	Field Worker
		xxx999	11.12.2014	Male	Bangladeshi	General Worker

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		xxx610	19.09.2019	Male	Indian	Loose Fruits Collector
		xxx050	26.10.2014	Male	Nepalese	Field Worker
		xxx577	25.10.2022	Male	Indonesian	FFB Harvester
		xxx233	11.1.2023	Male	Indonesian	FFB Harvester
		xxx357	12.6.2023	Male	Indonesian	Frond Stacker
		xxx840	8.11.2023	Male	Indonesian	FFB Harvester
		xxx505	19.12.2023	Male	Indonesian	Frond Stacker
		North Labis Estate				
		xx429	2.5.2009	Male	Malaysian	General Worker
		xxx462	11.9.2023	Male	Malaysian	Loose Fruits Collector
		xxx019	9.11.2020	Male	Malaysian	Driver
		xxx546	11.1.2020	Female	Malaysian	General Worker
		xxx202	12.7.2021	Female	Malaysian	General Worker
		xxx027	11.12.2014	Male	Bangladeshi	Driver
		xxx702	12.4.2017	Male	Indian	Field Worker
		xxx779	13.12.2019	Male	Indian	Loose Fruits Collector
		xxx219	19.1.2018	Male	Indonesian	FFB Harvester
		xxx561	16.11.2022	Male	Indonesian	FFB Harvester
		xxx037	18.2.2023	Male	Indonesian	General Worker
		xxx540	29.7.2023	Male	Indonesian	Loose Fruits Collector

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		xxx735	15.4.2023	Male	Indonesian	Field Worker	
		xxx019	10.8.2023	Male	Indonesian	General Worker	
		xxx439	19.12.2023	Male	Indonesian	FFB Harvester	
		xxx708	12.4.2017	Male	Nepalese	Loose Fruits Collector	
		xxx520	13.9.2016	Male	Sri Lankan	General Worker	
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).							
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	SD Guthrie Berhad (formerly known as Sime Darby Plantation 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] and the collective agreement is valid for three (3) years or until superseded by new Collective Agreement or an Award of the Industrial Court. 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	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on</p>	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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		xxx441	9.8.2019	Male	Indian	General Worker
		xxx437	13.12.2014	Male	Bangladeshi	Pruner
		Sungai Simpang Kiri Estate				
		xx524	1.1.1985	Female	Malaysian	General Worker
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		xxx560	5.4.2022	Male	Malaysian	General Worker
		xxx152	2.1.2023	Female	Malaysian	Field Worker
		xxx999	11.12.2014	Male	Bangladeshi	General Worker
		xxx610	19.09.2019	Male	Indian	Loose Fruits Collector
		xxx050	26.10.2014	Male	Nepalese	Field Worker
		xxx577	25.10.2022	Male	Indonesian	FFB Harvester
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		xxx357	12.6.2023	Male	Indonesian	Frond Stacker
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		North Labis Estate				
		xx429	2.5.2009	Male	Malaysian	General Worker
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		xxx019	9.11.2020	Male	Malaysian	Driver
		xxx546	11.1.2020	Female	Malaysian	General Worker
		xxx202	12.7.2021	Female	Malaysian	General Worker
		xxx027	11.12.2014	Male	Bangladeshi	Driver
		xxx702	12.4.2017	Male	Indian	Field Worker
		xxx779	13.12.2019	Male	Indian	Loose Fruits Collector
		xxx219	19.1.2018	Male	Indonesian	FFB Harvester

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		<table><tr><td>xxx561</td><td>16.11.2022</td><td>Male</td><td>Indonesian</td><td>FFB Harvester</td></tr><tr><td>xxx037</td><td>18.2.2023</td><td>Male</td><td>Indonesian</td><td>General Worker</td></tr><tr><td>xxx540</td><td>29.7.2023</td><td>Male</td><td>Indonesian</td><td>Loose Fruits Collector</td></tr><tr><td>xxx735</td><td>15.4.2023</td><td>Male</td><td>Indonesian</td><td>Field Worker</td></tr><tr><td>xxx019</td><td>10.8.2023</td><td>Male</td><td>Indonesian</td><td>General Worker</td></tr><tr><td>xxx439</td><td>19.12.2023</td><td>Male</td><td>Indonesian</td><td>FFB Harvester</td></tr><tr><td>xxx708</td><td>12.4.2017</td><td>Male</td><td>Nepalese</td><td>Loose Fruits Collector</td></tr><tr><td>xxx520</td><td>13.9.2016</td><td>Male</td><td>Sri Lankan</td><td>General Worker</td></tr></table>	xxx561	16.11.2022	Male	Indonesian	FFB Harvester	xxx037	18.2.2023	Male	Indonesian	General Worker	xxx540	29.7.2023	Male	Indonesian	Loose Fruits Collector	xxx735	15.4.2023	Male	Indonesian	Field Worker	xxx019	10.8.2023	Male	Indonesian	General Worker	xxx439	19.12.2023	Male	Indonesian	FFB Harvester	xxx708	12.4.2017	Male	Nepalese	Loose Fruits Collector	xxx520	13.9.2016	Male	Sri Lankan	General Worker	
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xxx708	12.4.2017	Male	Nepalese	Loose Fruits Collector																																							
xxx520	13.9.2016	Male	Sri Lankan	General Worker																																							
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) between National Union of Plantation Workers (NUPW) has established 'MAPA/NUPW Palm Oil Mill Employees' Agreement' that describes the term and condition of workers employment. Sighted the agreement is available in English and valid for three (3) years or until superseded by new Collective Agreement or an Award of the Industrial Court.</p> <p>Each visited operating unit under SOU 20 UoC has established a contact agreement and offer letter for foreign and local workers, respectively. The contract agreement is available in Bahasa Malaysia, Indonesia, Bengali, Hindi and Tamil depends on which country they are from. The contract agreement found signed by both parties (management and workers). Document review found, the employment contract has included a terms and condition of employment as example below:</p> <ul style="list-style-type: none">• Wages• Working Hours• Sick Leave• Annual Leave	Complied																																								

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- Maternity Leave (stated in Offer Letter for Local Workers)
- Termination Service

According to the interviewed workers, their working days are from Monday to Saturday, with Sunday is the rest day. Each visited operating unit provides a 3-month maternity leaves to the female workers regardless of the worker's race, religious and political attraction. While annual and medical leaves are offered based on the worker's service period. The unused annual leaves are paid during the December salary. The calculation of the paid annual leaves is based on their monthly salary which fluctuate depending on their performance and the rate is calculated as Ordinary Rate Pay as specified in the Employment Act.

Samples payslip for workers from various operations such as mill operators, harvester, field workers and general workers were verified. Overtime was found to be appropriate, and deduction was fairly made as per the agreement and approval from the Labour Department. Sample of workers for each operating units listed as per below worker's ID:

Employee No.	Date of Join	Gender	Nationality	Job Function
Chaah POM				
xx628	05.09.1997	Male	Malaysian	Driver
xxx047	12.12.2020	Male	Malaysian	Oil Room
xxx652	01.08.2021	Female	Malaysian	Gardener
xxx590	17.01.2023	Male	Malaysian	Lab Attendant
xxx504	05.04.2023	Male	Malaysian	General Worker
xxx094	01.02.2024	Male	Malaysian	Workshop
xxx096	12.08.2015	Male	Indian	Pressing Station

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		xxx451	12.06.2023	Male	Indonesian	Workshop	
		Chaah Estate					
		xxx370	11.3.2014	Female	Malaysian	General Worker	
		xxx271	16.1.2023	Male	Malaysian	General Worker	
		xxx013	26.10.2015	Male	Indonesian	General Worker	
		xxx090	29.08.2016	Male	Indonesian	Field Worker	
		xxx120	2.11.2022	Male	Indonesian	MB/MTG Driver	
		xxx762	15.11.2022	Male	Indonesian	Pruner	
		xxx755	30.12.2022	Male	Indonesian	Loose Fruits Collector	
		xxx497	24.2.2023	Male	Indonesian	FFB Harvester	
		xxx242	30.05.2018	Male	Nepalese	General Worker	
		xxx011	5.2.2018	Male	Indian	FFB Harvester	
		xxx441	9.8.2019	Male	Indian	General Worker	
		xxx437	13.12.2014	Male	Bangladeshi	Pruner	
		Sungai Simpang Kiri Estate					
		xx524	1.1.1985	Female	Malaysian	General Worker	
		xxx468	16.5.2016	Male	Malaysian	General Worker	
		xxx560	5.4.2022	Male	Malaysian	General Worker	
		xxx152	2.1.2023	Female	Malaysian	Field Worker	
		xxx999	11.12.2014	Male	Bangladeshi	General Worker	
		xxx610	19.09.2019	Male	Indian	Loose Fruits Collector	
		xxx050	26.10.2014	Male	Nepalese	Field Worker	
		xxx577	25.10.2022	Male	Indonesian	FFB Harvester	
		xxx233	11.1.2023	Male	Indonesian	FFB Harvester	
		xxx357	12.6.2023	Male	Indonesian	FronD Stacker	

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		xxx840	8.11.2023	Male	Indonesian	FFB Harvester	
		xxx505	19.12.2023	Male	Indonesian	Frond Stacker	
		North Labis Estate					
		xx429	2.5.2009	Male	Malaysian	General Worker	
		xxx462	11.9.2023	Male	Malaysian	Loose Fruits Collector	
		xxx019	9.11.2020	Male	Malaysian	Driver	
		xxx546	11.1.2020	Female	Malaysian	General Worker	
		xxx202	12.7.2021	Female	Malaysian	General Worker	
		xxx027	11.12.2014	Male	Bangladeshi	Driver	
		xxx702	12.4.2017	Male	Indian	Field Worker	
		xxx779	13.12.2019	Male	Indian	Loose Fruits Collector	
		xxx219	19.1.2018	Male	Indonesian	FFB Harvester	
		xxx561	16.11.2022	Male	Indonesian	FFB Harvester	
		xxx037	18.2.2023	Male	Indonesian	General Worker	
		xxx540	29.7.2023	Male	Indonesian	Loose Fruits Collector	
		xxx735	15.4.2023	Male	Indonesian	Field Worker	
		xxx019	10.8.2023	Male	Indonesian	General Worker	
		xxx439	19.12.2023	Male	Indonesian	FFB Harvester	
		xxx708	12.4.2017	Male	Nepalese	Loose Fruits Collector	
		xxx520	13.9.2016	Male	Sri Lankan	General Worker	
6.2.4	(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	The management provides adequate living quarters with basic amenities to ensure the workers are comfortable doing their daily routine. Sighted during site visits; habitable quarters, sanitation facilities, water, and electricity supply, medical, educational and welfare amenities were provided as per industry best practices.					Complied

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	<p>upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Observed during site visit, the management has provided housing facilities such as ceiling fan, bed, and mattress.</p> <p>Workers are accommodated at the housing complex quarters of the operating units without any charges. Free water supply, subsidised electric supply and free medical support were also given to all workers. Housing inspection was conducted weekly by the Medical Assistant using the Housing Complex/ Nest/ Community Hall Weekly Inspection Checklists (PIOA). Sighted the form were categorized into:</p> <ul style="list-style-type: none"> • Cleanliness/ domestic waste/ landscaping • Drainage system • Nursery/ crèche • Community hall, sports and other recreational facilities <p>Platform namely, 'OPP (Oil Palm Pal) System' with QR code is developed for workers lodge a report pertaining to the housing defects. Sighted in the OPP system, the workers need to provide Name, House Number and Damage Complaint before submitting the complaint. Later, the complaint report will be summarized into 'Housing Defect Consent Form' (HDCF) that contain the following information:</p> <ul style="list-style-type: none"> • Status (completed/ void/ incomplete) • Risk category • Estimated completion date • Date start in progress • Date completed • Date voided • Remarks 	
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		<p>Review the sample of OPP form at visiting estate and mill found, there is no issue left unattended by the management where all complaints received were resolved within 14 days.</p> <p>During site visit to the worker quarters compound, it was observed that the repair of worker quarters drains was in progress. The progress of the drain repairs has also been recorded on the worker quarter map. Records of drain repairs are also maintained by the operating unit, documented through photos and records of payments related to the repairs.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There was no issue on accessibility to adequate and sufficient food supplies as sundry shops were available in housing complex. Site visit to the sundry shop found, basic food and cooking utensils are available at reasonable prices. the owner of the shop has able to present valid permit form the government agencies to sell controlled item such as cooking oil, rice, and flour. 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 with sampled workers, the basic supplies were affordable.</p> <p>In addition, 10 kg of rice are provided at no cost to all of the workers for every two months. Sampled workers' have given positive feedback on this initiative where they can save the money allocated to buy a rice.</p>	Complied
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: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p>	<p>The SOU 20 UoC has provided decent living wage for both local and foreign workers based on company's prevailing wages assessment. Among the items included in the calculation were:</p> <ul style="list-style-type: none"> • Wage (Basic, paid leaves, CA incentives, top up) • Service Bonus (Retention bonus) 	Complied

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<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 methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages 	<ul style="list-style-type: none"> • Meals (Meal allowance, Meal arrival, Rice) • Housing (Rental, Maintenance & utilities) • Health (Medical cost, clinic, transport, staff) • Facilities (Public building maintenance and utilities) • Sports and recreation (Family Day, sports equipment, field and playground maintenance) • Education (Operating & maintenance cost for kindergarten, material-uniform, transport, staff, annual benefit) • Creche (Maintenance cost, material-milk, staff) • Welfare (Arrival token, Festive token, Donation, rukun tetangga) • Transport (transport allowance) • Telecommunication (Phone reload) <p>Based on the assessment, it is verified that the prevailing wages for both local and foreign workers received are above minimum wages set by the Malaysian Government.</p> <p>Document review of sampled worker's payslips, sighted with evidence that daily rated workers receive at least minimum wages is RM57.69 per day. For piece-rated workers paid according to capability of the workers to achieve daily target. The piece-rated workers received their wages from RM1,500.00 and above per each month. For both, daily rated workers and piece rated workers are complied with the Minimum Wage Order 2022. The management conducted Prevailing Wage Assessment based on check-roll worker for period 2023 and published in July 2024.</p>	
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	<ul style="list-style-type: none"> 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 core activities such as milling activities, harvesting, chemical spraying and fertilizer application were performed by the permanent employee.</p> <p>Sighted during site visit, each operating unit is using SAP (System Application and Product in Data Processing) system to maintain and update the administration and operation information. By using the SAP, each operating unit has established 'Employee Master List' which includes an information such as:</p> <ul style="list-style-type: none"> Employee number Full name Date of Birth Nationality Date of Join Employment Status Race <p>Each visited operating unit has appointed a contractor for EFB transport and FFB transport. Through documentation review, estates and mill has established a contract agreement between the contractors and describe the term and condition of the job awarded. Verification on the contract agreement found, the contract agreement is signed by both parties. There are no casual or</p>	Complied

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		temporary workers has been recruited by all operating units as verified in the master list of workers.	
Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.3.1	<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>Policy to respect the rights of all employees has been embedded in SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established policy of "Group Sustainability & Quality Policy Statement" which was signed by the Group Managing Director, dated 2/12/2019. The policy is guided by Human Right Charter (HRC) revised 2020. Section 3.2.4 of HRC stated that the company respecting freedom of association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, we will provide alternative means of employee engagement and grievance redressal.</p> <p>Employees were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample latest minutes of meeting between Management and NUPW representatives. The policy has been communicated to the workers through musters call as verified during the interview session with sampled workers during the audit.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Based on documentation review, each visited operating unit has conducted a meeting between NUPW representatives and management with latest conducted at Chaah POM on 27/05/2024, at Sungai Simpang Kiri Estate on 24/04/2024, and at North Labis Estate on 15/02/2024.</p> <p>Management plan was developed for the issues raised by the NUPW representatives and action has been taken accordingly. Interviewed with the NUPW representatives confirmed that the issues raised</p>	Complied

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		during the meeting were resolved. Sampled workers interview also informed that union representatives are freely elected where there is no interference from management, and they are also involved in voting to appoint representatives. The presence of NUPW Branch Officer was also there to monitor the voting process for the election of NUPW representatives is independent and freely conducted.	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>The management, through the National Union of Plantation Workers (NUPW) (Peninsular Malaysia), has appointed workers' representatives from various groups, regardless of nationality, religion, race, political view, or gender.</p> <p>The workers' representatives were selected through an election by the workers. Workers nominate their representatives before the election takes place. After the election, the NUPW Branch issues an appointment letter to the selected representative, and a copy of the appointment letter is submitted to the management for informational purposes.</p> <p>(1) <u>Chaah POM</u>: On 29/12/2022, the NUPW Johor State Branch sent an official letter (Ref. No. NUPW/JSB/E/27/2022) to the management of Chaah POM, informing them that the new NUPW Local Committee Members have been elected for the next two years. The committee is composed of 1 Chairman, 1 Vice Chairman, 1 Secretary, and 2 Committee Members.</p> <p>(2) <u>Chaah Estate</u>: On 18/10/2023, the NUPW Johor State Branch sent an official letter (Ref. No. NUPW/JSB/E/26/2023) to the management of Chaah Estate, informing them that the new NUPW Local Committee Members have been elected for the next two years.</p> <p>(3) <u>Sungai Simpang Kiri Estate</u>: On 06/10/2022, the NUPW Johor State Branch sent an official letter (Ref. No. NUPW/JSB/E/92A/2022) to the management of Sungai</p>	Complied

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		<p>Simpang Kiri Estate, informing them that the new NUPW Local Committee Members have been elected for the next two years. The committee consists of 1 Chairman, 1 Secretary, and 1 Committee Member.</p> <p>(4) <u>North Labis Estate</u>: On 20/01/2022, the NUPW Johor State Branch sent an official letter (Ref. No. NUPW/JSB/E/141/2022) to the management of North Labis Estate, informing them that the new NUPW Local Committee Members have been elected for the next two years. The committee consists of 1 Chairman, 1 Secretary, and 12 Committee Members.</p> <p>It was further confirmed during interviews with the NUPW representatives and the workers that the election of the representatives was conducted freely by the workers without any influence or interference from the management.</p>	
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Policy to protect children and young person has been embedded in SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established policy of "Group Sustainability & Quality Policy Statement" which was signed by the Group Managing Director, dated 02/12/2019. The policy is guided by Human Right Charter (HRC) revised 2020. Section 3.3.1 of HRC stated the company committed to eradicating child labour in our supply chain and will not 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</p>	Complied

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		prohibition of child labour. This has confirmed with the sampled stakeholders through stakeholder consultation.	
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>Policy to protect children and young person has been embedded in SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established policy of "Group Sustainability & Quality Policy Statement" which was signed by the Group Managing Director, dated 02/12/2019. The policy is guided by Human Right Charter (HRC) revised 2020. Section 3.3.1 of HRC stated the company committed to eradicating child labour in our supply chain and will not 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 sampled stakeholders through stakeholder consultation.</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>From the list of employees which has the date of birth and date of join the estate, it can be confirmed that there are no children nor young workers working in each operating unit, including the contractors' workers. Further confirmation was made through site visit at the workplace area and interviews with the workers onsite. Identity documentation such as passports and identity cards were verified.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The management of each operating unit has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour. This had also been confirmed through interview with the stakeholders and contractors.</p>	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			

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6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Human Rights Charter (HRC) last revised 2020 where stated the policy and commitment of the company to prevent all forms of sexual harassment and violence at the workplace. Under section 3.2.1 of HRC stated that the company's commitment on eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking, and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. Furthermore, under section 3.2.6 mentioned the company is committed to creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. The policy has been communicated to the workers through musters and display on notice boards.</p> <p>Based on the interview with the workers (male and female), no issues on sexual harassment have been lodged or happened. They were also aware of the channels that they can use to lodge their concern. This has also been reminded during morning muster once in a while. Furthermore, the female workers are aware of the procedure if such incident occurs whereby, they can reports using the Grievance channel such as Suara kami and whistleblowing, or direct report to the management.</p>	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>	<p>Stated in the human right charter year 2020, commitment of SD Guthrie Berhad in protecting reproductive right and has been clearly outline in clause 3.2.5. There is evidence that the policy has been implemented where there is no restriction by the management for pregnancy and there are no pregnant/breastfeeding women handling with chemical. It has been further confirmed through interview with the female workers.</p>	Complied

		Communication of the policy sighted based on briefing records for each operating units and further verified based on interview with the sampled stakeholders and workers which can demonstrate their understanding on the policy that has been established.	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Assessments for new mothers (with infants under 24 months) for FY2024 were conducted by each operating unit. The management appointed a female employee (either the chair of the Gender Committee or the female Medical Assistant (MA)) to conduct the assessments. These assessments were carried out through direct interviews with the female workers.</p> <p>(1) Chaah POM: No new mothers since the last audit.</p> <p>(2) Chaah Estate: The needs of 2 new mothers were assessed on 08/01/2024.</p> <p>(3) Sungai Simpang Kiri Estate: No new mothers since the last audit.</p> <p>(4) North Labis Estate: As of the assessment on 07/06/2024, there is 1 new mother and 1 pregnant woman. The new mother gave birth on 05/03/2024.</p> <p>Based on the verification of the assessment reports and interviews, most new mothers sent their children to their mothers or outside daycare services and were not breastfeeding. However, the management granted them time during working hours for breastfeeding and regular visits to clinics if needed.</p>	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>	It has been clearly stated in the Policy on the protection of human rights defenders (HRDs) year 2020 clause 3.3; protection against threats and retaliations that HRD and individual shall be protected from violence, threats and all form of retaliation and clause 3.1; the identity of individuals and information shared in by HRDs, shall be	Complied

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		<p>kept confidential to the fullest possible extent in a manner consistent with the need to conduct an investigation, unless the individual consents to disclosure or if disclosure is otherwise required by law.</p> <p>Each operating unit has established gender committee with objective to improve awareness, identify opportunity and improvement and issue of the workers specifically on women. The committee will act as the mechanism to monitor and investigate if there is any sexual harassment, domestic violence, and abusive children in the operating unit. The frequency of the meeting is once in three months.</p> <p>Apart from that, flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders.</p> <p>In addition, the company has implemented "Suara Kami Helpline" as a platform for the workers to raise any issue. The workers have been informed about the platform through morning muster and display on notice boards. The procedure is also accessible on the company's website.</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 	<p>Human Rights Charter 2020 included the commitment to respect and uphold labour rights, under which included the commitment as required in this indicator.</p> <p>Based on interview with the sampled workers, observation, documentation review and site visit to the labour quarters and estate facilities, the following were verified:</p>	Complied

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	<ul style="list-style-type: none"> • 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>a. Retention of identity documents or passports: 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. Sampled workers were interviewed and confirmed that they keep their passports themselves. This was further verified during the site visit to the labour quarters, where passport was observed to be kept in the workers houses. Furthermore, the management provides lockers for workers to keep their passport safely. The locker keys are kept by the workers with no duplicate keys held by the management.</p> <p>b. Charging of recruitment fee: As specified in the Migrant Worker Responsible Recruitment Procedure 2024, all recruitment fees are borne by the company. Interviews conducted with sampled workers also confirmed that they have not been charged any recruitment fees. They inform that the workers can report any recruitment fees incurred by them to the management prior to departure in source countries, after arrival, during induction process and through grievance procedures.</p> <p>c. Contract substitution: Based on document review, worker interview and site tour, it was noted all the migrant workers are legally recruited. Written employment contract was provided to them in a language that was understood by the workers. Explanation of terms and condition in the contracts was conducted in their origin country. Interview with the sampled workers confirmed that they have entered employment by voluntarily and freely basis. They also informed that all contract signed in their origin country is consistent with the terms and condition that they received upon arrival.</p> <p>d. Involuntary overtime: Based on interviews conducted with the sampled workers, all overtime work was carried out on a</p>	
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		<p>voluntary basis. Workers are free to decline any offers for overtime work.</p> <p>e. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers. There is no term and condition for any resignation and the flight tickets will bear by the company. Verification of the repatriation records and interview with the sampled workers, shows that the workers are given freedom to going back for long leaves or going back for goods. Some workers, who have been employed in the estate and mill for 5 to 12 years, have taken long leaves 2 or 3 times during their services.</p> <p>f. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no loan/borrowing money has been given by the management to the workers. There is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement.</p> <p>g. Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by account and can be withdraw at the nearest bank and sighted evidence of payment that has been signed by the workers. There is evidence that there no workers' wages have been withheld. It has been further confirmed through interview with sampled workers.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	Human Rights Charter 2020 included the commitment to respect and uphold labour rights, under which included the commitment as required in this indicator.	Complied

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		<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established Migrant Worker Responsible Recruitment Procedure, dated 01/2024. This procedure serves as operational guidance on company commitments in the Human Rights Charter, 2020. The procedure among others included the appointment and monitoring of the agent's performance, and the benefits and rights of the workers at their home country and upon arrival in Malaysia.</p> <p>There are migrant workers has been recruited from Sri Lanka, India, Indonesia, Nepal and Bangladesh to work in SOU 20 UoC. Verification during the audit found that there is evidence that the policy and procedures has been implemented where each process of recruitment has been done such as signing employment contract, interview, and consultation with migrant workers at origin countries and One Stop Centre. Based on interview with sampled workers, it has been confirmed that all facilities and benefits has been provided equally for all foreign workers. Passport has been kept by the workers itself. There is no evidence of contract substitution where all migrant workers have been explained the content of the employment contract at the origin countries. It has been confirmed through interview with the workers itself.</p>	
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>All estates 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>	Complied

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		<table><tr><th colspan="5">Reviewed latest safety minutes meeting for operating unit:</th></tr><tr><th>Operating Unit</th><th>4th meeting (2023)</th><th>1st meeting (2024)</th><th>2nd meeting (2024)</th><th>3rd meeting (2024)</th></tr><tr><td>Chaah Estate</td><td>20/12/2023</td><td>14/02/2024</td><td>13/05/2024</td><td>29/07/2024</td></tr><tr><td>Chaah POM</td><td>28/12/2023</td><td>26/02/2024</td><td>22/05/2024</td><td>16/08/2024</td></tr><tr><td>Sungai Simpang Kiri Estate</td><td>01/12/2023</td><td>28/02/2024</td><td>27/05/2024</td><td>16/08/2024</td></tr><tr><td>North Labis Estate</td><td>28/10/2023</td><td>01/01/2024</td><td>29/03/2024</td><td>27/06/2024</td></tr></table>	Reviewed latest safety minutes meeting for operating unit:					Operating Unit	4 th meeting (2023)	1 st meeting (2024)	2 nd meeting (2024)	3 rd meeting (2024)	Chaah Estate	20/12/2023	14/02/2024	13/05/2024	29/07/2024	Chaah POM	28/12/2023	26/02/2024	22/05/2024	16/08/2024	Sungai Simpang Kiri Estate	01/12/2023	28/02/2024	27/05/2024	16/08/2024	North Labis Estate	28/10/2023	01/01/2024	29/03/2024	27/06/2024	
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6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>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, 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</p>	Complied																														

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		<p>(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><td>Operating Unit</td><td>Date</td></tr><tr><td>Chaah Estate</td><td>29/04/2024</td></tr><tr><td>Chaah POM</td><td>23/05/2024</td></tr><tr><td>Sungai Simpang Kiri Estate</td><td>12/06/2024</td></tr><tr><td>North Labis Estate</td><td>24/07/2024</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>Signages for Emergency Response Plan (ERP) are observed in display at each station of operation which clearly indicated directions for evacuation and the assembly area.</p> <p>Monthly First Aid inspection record and updates was conducted by each Medical Assistant (MA) as table below:</p> <table><tr><td>Certification Unit</td><td>No of First Aider</td><td>Date of Latest Monthly Inspection</td></tr><tr><td>Chaah Estate</td><td>15 employees</td><td>09/08/2024</td></tr><tr><td>Chaah POM</td><td>7 employees</td><td>19/08/2024</td></tr></table>	Operating Unit	Date	Chaah Estate	29/04/2024	Chaah POM	23/05/2024	Sungai Simpang Kiri Estate	12/06/2024	North Labis Estate	24/07/2024	Certification Unit	No of First Aider	Date of Latest Monthly Inspection	Chaah Estate	15 employees	09/08/2024	Chaah POM	7 employees	19/08/2024	
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		<table><tr><td>Sungai Simpang Kiri Estate</td><td>12 employees</td><td>30/07/2024</td></tr><tr><td>North Labis Estate</td><td>20 employees</td><td>24/07/2024</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>	Sungai Simpang Kiri Estate	12 employees	30/07/2024	North Labis Estate	20 employees	24/07/2024	
Sungai Simpang Kiri Estate	12 employees	30/07/2024							
North Labis Estate	20 employees	24/07/2024							
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The 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><u>Chaah Estate</u></p> <p>Site visit and interview session with Inter-row Spraying activity at P19A confirmed that sprayers were provided with PPE such as safety helmets, aprons, mask, goggle, and wellington boots as per HIRARC documents.</p> <p><u>Chaah POM</u></p> <p>Site visit and observation at Ramp Station, Sterilizer Station and Boiler Station found that workers wore appropriate PPE as per recommended by PPE matrix accordingly.</p>	Complied						

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		<p><u>Sungai Simpang Kiri Estate</u></p> <p>Site visit and interview session with Spraying Activity at P06A confirmed that sprayers were provided with PPE such as safety helmets, aprons, mask, goggle, and wellington boots as per HIRARC documents.</p> <p><u>North Labis Estate</u></p> <p>Site visit and interview session with Spraying Activity at P20A confirmed that sprayers and tractor driver were provided with PPE such as safety helmets, aprons, mask, goggle, and wellington boots as per HIRARC documents.</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 estates and mill conduct 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>Chaah Estate</td><td>Rat Baiter</td><td>17/08/2024</td></tr><tr><td>Chaah POM</td><td>Boiler</td><td>10/08/2024</td></tr><tr><td>Sungai Simpang Kiri Estate</td><td>Spraying Activity</td><td>06/08/2024</td></tr><tr><td>North Labis Estate</td><td>MB Drivers</td><td>15/08/2024</td></tr></table>	Certification Unit	Activity Inspected	Date	Chaah Estate	Rat Baiter	17/08/2024	Chaah POM	Boiler	10/08/2024	Sungai Simpang Kiri Estate	Spraying Activity	06/08/2024	North Labis Estate	MB Drivers	15/08/2024	
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North Labis Estate	MB Drivers	15/08/2024																
6.7.4	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.	Noted that all employees receive medical care known as SOCSO contribution, and a review of workers' profile records indicates that	Complied															

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	- Minor compliance -	<p>every worker is covered by accident insurance. Summary of employers contribution value as table below:</p> <table> <tr> <th>Certification Unit</th><th>Month</th><th>Total Workers</th><th>Amount</th></tr> <tr> <td>Chaah Estate</td><td>July 2024</td><td>245</td><td>RM7,600.50</td></tr> <tr> <td>Chaah POM</td><td>July 2024</td><td>102</td><td>RM6,194.30</td></tr> <tr> <td>Sungai Simpang Kiri Estate</td><td>July 2024</td><td>141</td><td>RM8,411.50</td></tr> <tr> <td>North Labis Estate</td><td>July 2024</td><td>300</td><td>RM17,538.70</td></tr> </table>	Certification Unit	Month	Total Workers	Amount	Chaah Estate	July 2024	245	RM7,600.50	Chaah POM	July 2024	102	RM6,194.30	Sungai Simpang Kiri Estate	July 2024	141	RM8,411.50	North Labis Estate	July 2024	300	RM17,538.70	
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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>Chaah Estate</td><td>11</td><td>100 days</td><td>JKKP 8/131161/2023</td></tr> <tr> <td>Chaah POM</td><td>1</td><td>5 days</td><td>JKKP 8/105951/2023</td></tr> <tr> <td>Sungai Simpang Kiri Estate</td><td>8</td><td>18 days</td><td>JKKP 8/172896/2023</td></tr> <tr> <td>North Labis Estate</td><td>7</td><td>16</td><td>JKKP 8/159241/2023</td></tr> </table>	Operating Unit	Accidents Reported	Lost Time Accident (LTA)	Reference No.	Chaah Estate	11	100 days	JKKP 8/131161/2023	Chaah POM	1	5 days	JKKP 8/105951/2023	Sungai Simpang Kiri Estate	8	18 days	JKKP 8/172896/2023	North Labis Estate	7	16	JKKP 8/159241/2023	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 continued to monitor the Implementation of Integrated Pest Management (IPM) plans. a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides.</p> <ul style="list-style-type: none"> Planting beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, along the roadsides and designated points in the fields and within the nursery perimeter. Establishment of single layer EFB mulching to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. Census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year were recommended by the GM /Agronomist. Baiting is continued until bait acceptance threshold level. 	Complied
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. The estates have declared this compliance in the status of IPM species invasiveness.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>As outlined in SD Guthrie Group's Sustainability and Quality Policy, signed by the Group Managing Director on 02/12/2019 and Responsible Agriculture Charter, all estates mandates zero tolerance for fire use, effective monitoring and prevention systems, and</p>	Complied

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		<p>protective firefighting measures to protect forests and wildlife and minimize carbon emissions.</p> <p>It also emphasizes the establishment of effective monitoring and prevention systems to ensure adherence to this policy as well as aims to safeguard the environment, support biodiversity, and contribute to the overall sustainability goals of the SD Guthrie Berhad. As per visit at each estate, there is no traces of evidence of fire usage for pest control observed.</p>					
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.							
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>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. Referring to the Sime Darby Agricultural Reference Manual, (ARM), 3rd Edition, date issued 06/12/2023, the selection of products was tailored to address the specific target pest, weed, and disease.</p> <p>Sighted and reviewed chemical register and confirmed that all operating units confined usage to class III & class IV pesticides. Other details observed in the chemical register were Product name, Chemical Name, Physical Form, Type of Control Measures, Usage of Chemicals, CAS No. Name of Active Ingredients, CPL Regulations 1977 Compliance and Details of Suppliers.</p>	Complied				
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>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"> <tr> <td>a.i/ha (2024)</td><td>Chaah Estate</td><td>Sungai Simpang Kiri Estate</td><td>North Labis Estate</td></tr> </table>	a.i/ha (2024)	Chaah Estate	Sungai Simpang Kiri Estate	North Labis Estate	Complied
a.i/ha (2024)	Chaah Estate	Sungai Simpang Kiri Estate	North Labis Estate				

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		<table> <tr><td>Jan</td><td>3.39</td><td>0.20</td><td>3.48</td></tr> <tr><td>Feb</td><td>1.40</td><td>0.20</td><td>2.73</td></tr> <tr><td>Mar</td><td>0.00</td><td>0.21</td><td>0.73</td></tr> <tr><td>Apr</td><td>1.32</td><td>0.24</td><td>0.85</td></tr> <tr><td>May</td><td>1.69</td><td>0.20</td><td>0.10</td></tr> <tr><td>June</td><td>2.55</td><td>0.21</td><td>0.11</td></tr> <tr><td>July</td><td>1.53</td><td>0.19</td><td>2.76</td></tr> </table>	Jan	3.39	0.20	3.48	Feb	1.40	0.20	2.73	Mar	0.00	0.21	0.73	Apr	1.32	0.24	0.85	May	1.69	0.20	0.10	June	2.55	0.21	0.11	July	1.53	0.19	2.76	
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>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.</p> <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>	Complied																												
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	No prophylactic use of pesticides can be identified during site visit and confirmation with Chemical Register updated on 01/01/2024	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>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</p>	Complied																												

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	<p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>methyl, triclopyr which categorized as 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 	
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> <p>Chaah Estate - Training on Chemical Handling and Store Management regarding SOP and Cleanliness, dated 17/07/2024</p> <p>Sungai Simpang Kiri Estate - Chemical Handling Training, dated 14/02/2024</p> <p>North Labis Estate - Briefing Safety Work Procedure for Chemical Handlers, dated 23/04/2024</p> <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</p>	Complied

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		<p>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>	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Unused chemical containers not utilized for premixing were subjected to triple rinsing and puncturing. These containers were then classified as scheduled waste and appropriately disposed of through waste collection contractors, as outlined in Indicator 7.3.2</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable since there is no aerial spraying has been executed in SOU 20 Unit of certification.</p>	Not Applicable
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><u>Chaah Estate</u></p> <p>Latest Medical Surveillance conducted 17-18/05/2024, Ref No. 057/OHD/2025 with Klinik Segamat, DOSH No. HQ/08/DOC/00/545 involving 22 workers which involves in spraying, chemical premixing, and workshop operation. Report of the medical surveillance was available for review and no further medical concerns was noted.</p> <p><u>Sungai Simpang Kiri Estate</u></p> <p>Latest Medical Surveillance conducted 9-17/10/2023, Ref No. 088/OHD/2023 with Klinik Segamat, DOSH No. HQ/08/DOC/00/545 involving 19 workers which involves in spraying, chemical</p>	Complied

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		<p>premixing, and workshop operation. Report of the medical surveillance was available for review and no further medical concerns was noted.</p> <p><u>North Labis Estate</u></p> <p>Latest Medical Surveillance conducted 23/01-01/02/2024, Ref No. MS2024/Ladang North Labis/01/JAN/23 with Poliklinik Intan, DOSH No. HQ/08/DOC/00/468 involving 50 workers which involves in spraying, chemical premixing, and workshop operation. Report of the medical surveillance was available for review and no further medical concerns was noted.</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 P19A (Chaah Estate), P019A (Sungai Simpang Kiri Estate), P09C (North Labis 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>SOU20 Chaah POM and Estates had identified all wastes and sources of pollution. The Waste Management Action Plan FY 2023/2024 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estate and mill operations were:</p> <table><tr><td></td><td>Receptor</td><td>Sources</td></tr><tr><td>1</td><td>Air</td><td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td></tr></table>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	Complied
	Receptor	Sources							
1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG							

2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down																											
3	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.																											
<p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2023/2024. The waste generated from the mill/estate operations as shown below;</p> <table border="1"> <thead> <tr> <th></th><th>Type of waste</th><th>Details</th></tr> </thead> <tbody> <tr> <td>1</td><td>Scheduled waste</td><td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td></tr> <tr> <td>2</td><td>Domestic waste</td><td>rubbish from the mill complex and employees' quarters</td></tr> <tr> <td>3</td><td>Industrial waste</td><td>Fibre, palm kernel shell, boiler ash, scrap iron</td></tr> <tr> <td>4</td><td>Sewage</td><td>Sewage from housing/office complex</td></tr> </tbody> </table> <p>The pollution identified from the mill activities</p> <table border="1"> <thead> <tr> <th></th><th>Type of waste</th><th>Details</th></tr> </thead> <tbody> <tr> <td>1</td><td>Black smoke and particulate</td><td>Emission from Boilers</td></tr> <tr> <td>2</td><td>Odor & gases</td><td>Activities from the effluent treatment</td></tr> <tr> <td>3</td><td>Leakage of lubricant</td><td>Storage & vehicle maintenance</td></tr> </tbody> </table>				Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill complex and employees' quarters	3	Industrial waste	Fibre, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex		Type of waste	Details	1	Black smoke and particulate	Emission from Boilers	2	Odor & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance
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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>The SOP on Scheduled Waste disposal is established and implemented.</p> <p>a) Details as provided in Waste Management Procedure for Upstream Malaysia, SD/SDP/GSD/HSE/0522/01 version 1 dated May 2022.</p> <p>b) The inventory of the waste generated is recorded using the "E-SWISS" inventory system. Methodology of SW disposal is also described in indicator 4.5.3.2 above.</p> <p>c) All SW were disposed to DOE's license contractor named Kxxxxxx Axxx Sxx Bxx, Cxxxxxx (M) Sxx Bxx and Rxxxxxx Maju (M) Sxx Bxx.</p> <p>The inventory of the waste generated is recorded using the "E-SWISS" inventory system. All SW are disposed to Kxxxxxx Axxx Sxx Bxx and Kxxxxxx Mxxxxxxx Sxx Bxx for the workshop lubricant and others waste. The estates scheduled wastes are disposed to Kubota Malaysia collection upon completion of machine/vehicles servicing and maintenance. Letter form DOE Putrajaya dated 13/04/2022 on the approval for Kxxxxxx Axxx Sxx Bxx for collection and disposal management of scheduled waste from machine/vehicle servicing and maintenance was sighted and verified.</p> <p>Records of domestic waste disposal to municipal council approved landfill were sighted and verified for at visited estates. Waste collection scheduled for 2x to 3x /week by contractor. At North Labis Estate, all domestic waste collected disposed at designated landfill area located > 0.5 meter away from any estate boundary, surface water and worker's linesite.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in SOU 20 Chaah POM and estate by burning ever since SDB practiced zero burning as per the policy in:</p>	Complied

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		<p>a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation</p> <p>b) Group Sustainability and Quality Policy Statement dated Dec 2019, supported by SDP Responsible Agriculture Charter</p> <p>SDP has a policy of no open burning. As advocated, the estate practiced zero burning. In the replants visited during the audit in the estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.</p>	
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>A Standard Operating Procedure (SOP) has been developed to enhance yield through optimized soil fertility management while minimizing environmental impacts. The maintenance of soil fertility is consistent with the guidelines outlined in the organization's SOPs, as detailed in the following documents:</p> <ul style="list-style-type: none"> • Chapter B8 of the Environmental and Quality Management System (EQMS) – Leguminous Cover Crops • Chapter B14 of the EQMS – Manuring • Section 8 of the Agricultural Resource Management (ARM) – Manuring 	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>The Research and Development Department conducted foliar and soil sampling before making fertilizer recommendations for the next financial year. Leaf and soil nutrient analyses are standard methods for diagnosing fertilizer needs in oil palms. Leaf sampling is required annually, while soil sampling is conducted every five years.</p> <p>Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been carried.</p>	Complied

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		<div>out in all estates. The latest being:</div> <table><tr><td></td><td>Estate</td><td>Report Date</td></tr><tr><td>1</td><td>Chaah Estate</td><td>12/06/2024</td></tr><tr><td>2</td><td>Sungai Simpang Kiri Estate</td><td>10/06/2024</td></tr><tr><td>3</td><td>North Labis</td><td>13/06/2024</td></tr></table> <div>Soil analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca & Exch Mg was carried out on a 5-year cycle basis and last carried out as follows:</div> <table><tr><td></td><td>Estate</td><td>Report Date</td><td>Report No</td></tr><tr><td>1</td><td>Chaah Estate</td><td>23/07/2018</td><td>S46/2018</td></tr><tr><td>2</td><td>Sungai Simpang Kiri Estate</td><td>05/04/2019</td><td>S32/2019</td></tr><tr><td>3</td><td>North Labis</td><td>13/07/2028</td><td>S45/2018</td></tr></table>		Estate	Report Date	1	Chaah Estate	12/06/2024	2	Sungai Simpang Kiri Estate	10/06/2024	3	North Labis	13/06/2024		Estate	Report Date	Report No	1	Chaah Estate	23/07/2018	S46/2018	2	Sungai Simpang Kiri Estate	05/04/2019	S32/2019	3	North Labis	13/07/2028	S45/2018	
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7.4.3	<div>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.</div> <div>- Minor compliance -</div>	<div>Records of EFB application were maintained by the sampled estates and made available for verification. Among the information available in the records is field number, quantity of EFB being applied (mt) and date of application. Based on the records, it was noted that the application rate pe Ha was around 20-40 mt/ha. The application was clearly seen during the field visit especially in the immature area.</div>	Complied																												
7.4.4	<div>Records of fertiliser inputs are maintained.</div> <div>- Minor compliance -</div>	<div>Following the agronomist's advice based on foliar sample analysis, fertilizers were applied. This process was overseen by the heads of the Performance Monitoring Unit. A comprehensive review of fertilizer application records was conducted for Chaah Estate, Sungai Simpang Kiri Estate, and North Labis Estate, covering the period up to July 2024. It was confirmed that all estates were on track in terms of their fertilizer programme.</div>	Complied																												

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Criterion 7.5: Practices minimise and control erosion and degradation of soils.																																											
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Soil maps and soil topography maps were available at the sampled estate, identifying the type of soil series and its area percentage within the estate. No marginal or fragile soils were identified at the assessed estate. The soil records are as follows:</p> <table><tr><td></td><td>Chaah Estate</td><td>Sungai Simpang Kiri Estate</td><td>North Labis Estate</td></tr><tr><td>1</td><td>Jerangau</td><td>Gajah Mati</td><td>Jabil</td></tr><tr><td>2</td><td>Rengam</td><td>Setol</td><td>Jempol</td></tr><tr><td>3</td><td>Local Alluvium</td><td>Sg Amin</td><td>Local Alluvium</td></tr><tr><td>4</td><td>Rasau</td><td>Bungor</td><td>Serdang</td></tr><tr><td>5</td><td>Bungor</td><td>Organic Clay</td><td>Yong Peng</td></tr><tr><td>6</td><td>Malacca</td><td rowspan="5"></td><td>Bungor</td></tr><tr><td>7</td><td>Segamat</td><td>Muck</td></tr><tr><td>8</td><td>Yong Peng</td><td>Munching</td></tr><tr><td>9</td><td>Kulai</td><td>Tavy</td></tr><tr><td>10</td><td>Durian</td><td>Malacca</td></tr></table>		Chaah Estate	Sungai Simpang Kiri Estate	North Labis Estate	1	Jerangau	Gajah Mati	Jabil	2	Rengam	Setol	Jempol	3	Local Alluvium	Sg Amin	Local Alluvium	4	Rasau	Bungor	Serdang	5	Bungor	Organic Clay	Yong Peng	6	Malacca		Bungor	7	Segamat	Muck	8	Yong Peng	Munching	9	Kulai	Tavy	10	Durian	Malacca	Complied
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7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad has established the Group Sustainability and Quality Policy Statement, dated 02/12/2019, and the Reclassification of Conservation Set Aside (CSA) for Upstream Operations, dated 31/05/2019, Ref: GSQM/PLS/CSA-GD01. Clause 3.1.2 of this document states that "No replanting is allowed in any individual contiguous area of steep slopes (greater than 25 degrees) larger than 2 hectares within the unit of certification."</p>	Complied																																								

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		<div>The slope maps for the titled ha were provided by the R&D Precision Agriculture Unit Sept 2019 with details as follows:</div> <table><tr><td>No</td><td>Topography</td><td>Chaah Estate</td><td>Sungai Simpang Kiri Estate</td><td>North Labis Estate</td></tr><tr><td>1</td><td>0-2</td><td>13.82</td><td>67.88</td><td>35.07</td></tr><tr><td>2</td><td>2-6</td><td>40.78</td><td>25.01</td><td>40.01</td></tr><tr><td>3</td><td>6-12</td><td>28.39</td><td>6.98</td><td>19.39</td></tr><tr><td>4</td><td>12-20</td><td>13.63</td><td>0.13</td><td>5.26</td></tr><tr><td>5</td><td>20-25</td><td>2.67</td><td>0.01</td><td>0.24</td></tr><tr><td>6</td><td>➤ 25</td><td>0.71</td><td>0.00</td><td>0.02</td></tr><tr><td></td><td>Total</td><td>100%</td><td>100%</td><td>100%</td></tr></table>	No	Topography	Chaah Estate	Sungai Simpang Kiri Estate	North Labis Estate	1	0-2	13.82	67.88	35.07	2	2-6	40.78	25.01	40.01	3	6-12	28.39	6.98	19.39	4	12-20	13.63	0.13	5.26	5	20-25	2.67	0.01	0.24	6	➤ 25	0.71	0.00	0.02		Total	100%	100%	100%	
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7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting conducted at all estates visited.	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 surveys are conducted and documented in soil maps available at the estates. Topographic contour maps, which are also available, are used for managing drainage and roadworks within the estates. The Soil Series Map, issued by the AAT – Precision Agriculture Unit, is dated March 2019. However, it was confirmed via observation and site visits that there were no new planting activities in the visited estates, making these criteria not applicable.	Not Applicable																																								

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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 -	It was mentioned in the SD Guthrie Berhad's Sustainability and Quality Policy Statement, signed by the Group Managing Director on 02/12/2019, and in the Responsible Agriculture Charter under Section 3.2, which states that extensive planting on marginal and fragile soils is to be avoided, or, if necessary, carried out in accordance with the soil management plan for best practices. However, it was confirmed that there were no new planting activities in the estates visited, making these criteria not applicable.	Not Applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys have been conducted and are available in soil maps at the estates. Topographic contour maps are also available and are used to manage drainage and roadworks within the estates. It was confirmed that there were no new planting activities in the visited estate, so these criteria are not applicable.	Not Applicable
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no new planting at sample estates. There is no peat soil identified at estate visited in SOU 20. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	There is no new planting at sample estates. There is no peat soil identified at estate visited in SOU 20. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There is no new planting at sample estates. There is no peat soil identified at estate visited in SOU 20. Verification through site visit, document checking, and interview confirmed that there is no new	Not Applicable

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		planting activity in the estate visited. Hence, the criterion is not applicable.	
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The water and ground cover management program is documented in the SD Guthrie Berhad (formerly known as Sime Darby Plantation Agricultural Reference Manual (Water Management in Coastal and Peat Lands), Issue No. 2, dated June 2021, with details provided in Section 7.8.1. Each estate and mill have its own water management plan, which primarily monitors the following aspects:</p> <ul style="list-style-type: none"> • Quality of the main water inlet/outlet for pollutants from estate operations. • Contingency plans for water shortages. • Field water management, including side pit construction. • Adequate field drainage. • Reuse and recycling of wastewater. • Water management for peat soils. <p>However, it was confirmed via observation and documents review that there is no peat soil or soil classified as marginal or fragile at SOU 20 Chaah estates.</p>	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p>	<p>There is no peat soil or soil classified as marginal or fragile at SOU 20 estates. It was confirmed that there were no new planting activities in the visited estate, making these criteria not applicable</p>	Not Applicable

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	<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>		
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>	There is no peat soil or soil classified as marginal or fragile at SOU 20 estates. It was confirmed that there were no new planting activities in the visited estate, making these criteria 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>	There is no peat soil or soil classified as marginal or fragile at SOU 20 estates. It was confirmed that there were no new planting activities in the visited estate, making these criteria not applicable	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>SOU20 Chaah POM certification unit had established its Water Management Plan for year 2024 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <p>a) Implementation of rainwater harvest,</p> <p>b) Construction of water gate for effective management of field drains,</p> <p>c) Establishment of <i>Mucuna bracteata</i> to prevent erosion,</p> <p>d) Side drain at field road to control water, frond stacking,</p> <p>e) Enhancement of ground vegetation at bare ground area.</p>	Complied

			The water sources are as shown below;						
				Water sources	Usage	Monitoring & measurement	Fr eq	PIC	Review status
		1	SAJ	Purchased for domestic consumption	Monitoring water supply	Mt hly	AM Mgr	Awaiting approval from authority	
		2	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	On - go in g	AM Mgr	Water harvesting for general washing	
		3	Water tank	Emergency water supply	-	-	AM Mgr	Request water supply from other estates	
		The contingency plan during water shortage							
			Area/incident	Action steps			PIC	status	
		1	Water shortage/ prolonged dry season	to obtain water from local authority /estate catchment to train/educate staff/workers to conserve water to seek assistance from local authority to obtain treated water supply from mill's WTP			Manager AM/Mill Engineer	As and when required	
		2	Severe water pollution/ Contamination	to obtain water from local authority to train/educate staff/workers to conserve water to seek assistance from local authority to obtain treated water supply from mill's WTP			Manager AM// Mill Engineer	As and when required	

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		<p>The Estate had implemented water managements plans which covered:</p> <ul style="list-style-type: none">a) Water shortage contingenciesb) Water pollution preventionc) Reduce wastaged) Identification & management of waste waterse) Monitoring rainfallf) Regular water quality analysis.																			
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>SOU20 estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the Riparian Reserve Management, Group Sustainability – Conservation and Biodiversity Unit (CBU) dated June 2021. The buffer zones established are as follows:</p> <table><tr><td></td><td><i>River width</i></td><td><i>Buffer zone</i></td></tr><tr><td>1</td><td>> 40 meters</td><td>50 meters</td></tr><tr><td>2</td><td>20 - 40 meters</td><td>40 meters</td></tr><tr><td>3</td><td>10 - 20 meters</td><td>20 meters</td></tr><tr><td>4</td><td>5 - 10 meters</td><td>10 meters</td></tr><tr><td>5</td><td>< 5 meters</td><td>5 meters</td></tr></table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSD Unit with latest revision dated on 13/6/2011.</p> <p>Water analysis report for surface water/river carried out every quarter as per SOP, Water Quality Monitoring, issue:1 dated 1//6/2016. A few parameters recorded were not complied with</p>		<i>River width</i>	<i>Buffer zone</i>	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	Complied
	<i>River width</i>	<i>Buffer zone</i>																			
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		<p>class IIA/IIB of NWQS and also pesticides residue in water analysis. Internal CAR was issued, and proper investigation of root cause and corrective action have been implemented.</p> <p>Samples are taken by the mill management for detection of any pollution arising from the mill and estate activities. As required under compliance schedule, clause 17 water samples from the upstream and downstream nearby river are taken for analysis for detection of any contamination /quality effect to the water courses on quarterly basis. Latest analysis report for upstream and downstream of final discharge point as per the following:</p> <table><tr><th>Sampling point</th><th>Date of monitoring</th><th>Remarks</th></tr><tr><td>Upstream (2.1613327, 102.968751)</td><td rowspan="2">16/07/2024</td><td rowspan="2">Ref: IE1155/2024 date of report 07/08/2024</td></tr><tr><td>Downstream (2.140485, 102.975715)</td></tr></table> <p>Water analysis report for surface water/river carried out every quarter as per SOP, Water Quality Monitoring, issue:1 dated 1//6/2016. A few parameters recorded were not complied with class IIA/IIB of NWQS and also pesticides residue in water analysis. Internal CAR was issued, and proper investigation of root cause and corrective action have been implemented.</p> <p>Among others management plan taken;</p> <ul style="list-style-type: none">a) Regular inspection at buffer/HCV areasb) Monitor water from surrounding areasc) Track, measure and report all activities around riverd) Train and educate workers.	Sampling point	Date of monitoring	Remarks	Upstream (2.1613327, 102.968751)	16/07/2024	Ref: IE1155/2024 date of report 07/08/2024	Downstream (2.140485, 102.975715)	
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7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	Based on " <i>Jadual Pematuhan</i> " (license no 004721 valid from 1/07/2024 until 30/06/2025), method of discharge for Chaah POM is land application with 2500 mg/l BOD ₃ . Sighted quarterly report has been submitted to DOE by quarterly basis and continuously comply with the stipulated limit.	Complied								
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording detailed sampled (water usage m ³ /per mt of fresh fruit bunches (FFB). Usage of water to FFB ranging from 1.3 - 1.6 m ³ /tonne FFB and varies depending on volume FFB processed for the particular month.	Complied								
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised											
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	<p>The monitoring is recorded in environment performance indicator-electricity generated by steam turbine tabulated for 2023 and to date 2024. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt CPO. A monthly record on energy consumption for both renewable and non-renewable sources were also maintained and documented. It is monitored to optimize use of renewable energy. The electricity energy monitoring based on CPO produced tabulated as shown below;</p> <table border="1"> <thead> <tr> <th></th><th>Energy Monitoring</th><th>2023</th><th>2024 (to date)</th></tr> </thead> <tbody> <tr> <td>1</td><td>kWh / mt CPO</td><td>91.74</td><td>83.80</td></tr> </tbody> </table> <p>Variation of ratio in the analysis were explained and justified. Under the energy management plan 2024 the mill aimed for reduction plan for fossil fuel usage;</p> <ul style="list-style-type: none"> - Educate workers on fuel saving practices. - Preventive maintenance programme 		Energy Monitoring	2023	2024 (to date)	1	kWh / mt CPO	91.74	83.80	Complied
	Energy Monitoring	2023	2024 (to date)								
1	kWh / mt CPO	91.74	83.80								

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>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4. Detail of GHG calculation can be found under appendix B.</p>	Complied			
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.	Not Applicable			
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>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estate and mill activities / operation. ‘Pollution Identification Environmental Improvement Action Plan’ is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table><tr><td></td><td>Environmental receptors</td><td>Source</td></tr></table>		Environmental receptors	Source	Complied
	Environmental receptors	Source				

		<table><tr><td>1</td><td>Air</td><td>Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td></tr><tr><td>2</td><td>Water</td><td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down</td></tr><tr><td>3</td><td>land</td><td>Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.</td></tr></table> <p>Summary of the latest stack sampling as per below:</p> <table><tr><td>Year</td><td>Stack sampling</td><td>Results vs limit</td></tr><tr><td>2024</td><td>Iso kinetic sampling by PXX Testing & Consulting Sdn Bhd ref: EXXXX/SDPSB-KFPOM/ISO/053/2024 Date of monitoring: 25/06/2024</td><td>Dust/particulate: 147 mg/m³ vs 150 mg/m³ CO: 769 mg/m³ vs 1000 mg/m³</td></tr></table>	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.	Year	Stack sampling	Results vs limit	2024	Iso kinetic sampling by PXX Testing & Consulting Sdn Bhd ref: EXXXX/SDPSB-KFPOM/ISO/053/2024 Date of monitoring: 25/06/2024	Dust/particulate: 147 mg/m ³ vs 150 mg/m ³ CO: 769 mg/m ³ vs 1000 mg/m ³	
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Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area																		
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Guided by SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) ARM, preparation of replanting using fire is not allowed. Based on site visit at replanting fields of the sampled estates, there was no trace of burning observed. Palm trunks were chipped and windrowed.	Complied															

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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>There was no land preparation by burning ever since SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) practice zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Group Sustainability and Quality Policy Statement dated Dec 2019, supported by SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) Responsible Agriculture Charter <p>The use of fire for waste disposal and for preparing land for oil palm cultivation or replanting was not practiced in the estate. The Group policy of "Zero open burning" has been enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any replanting. Furthermore, SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) assigned 1 person based in HQ being in charge to detect any open fire in the Company's fields using the Global Spot Watch. This is the measures taken by the organization to pledge towards zero open burning.</p> <p><u>Process flow for fire incident reporting</u></p> <p>Incident occurrence > SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) hotspot alert team identification > to notify OU > incident details investigated by OU > immediate site verification by OU > OU to report verification status using Fire Hotspot Internal Report (FHIR) > information with geo-tagged photo > reply to hotspot alert team.</p>	Complied
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7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Estates and mill under SOU20 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure and Fire Prevention and Control Measure. Therein containing;</p> <ul style="list-style-type: none"> a) Objective b) Activity and prevention c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>All stakeholders being briefed in the respective stakeholders meetings in a brief agenda relating to fire prevention and issues relating to environmental as verified with in the meeting agenda and interview with relevant stakeholders onsite.</p>	Complied
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting in all the 3 estates as concluded from this audit. This is made through checking of the area and ha statement and also the 5 year budget plan. Site visit and interview with the management of both estates further confirmed statement. Hence principle 7 is not applicable.</p>	Not Applicable
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <ul style="list-style-type: none"> a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the 	<p>The HCV re-assessment was compiled by GSD (Previously known as PSQM) team on Aug 2016 for Estates of SOU 20. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ul style="list-style-type: none"> a) Overview of HCV assessment b) Description of assessment area 	Complied

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	<p>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>	<ul style="list-style-type: none"> - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values <p>c) HCV criteria & application to agriculture</p> <ul style="list-style-type: none"> - Visual observation & supporting information - Wildlife in plantation - decision on HCV status <p>d) HCV management / Monitoring.</p> <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the estates within SOU 20 are given below;</p> <table border="1"> <thead> <tr> <th>Estate</th><th>Description</th><th>Ha</th><th>Type</th></tr> </thead> <tbody> <tr> <td>Sg Spg Kiri</td><td>Water catchment P06</td><td>0.32</td><td>HCV 4</td></tr> <tr> <td>Sg Spg Kiri</td><td>River reserve Sg Spg Kiri P04</td><td>8.94</td><td>HCV 4</td></tr> <tr> <td>Sg Spg Kiri</td><td>Bund P00</td><td>53.85</td><td>HCV 4</td></tr> <tr> <td>Chaah Estate</td><td>Water catchment P 04A</td><td>0.47</td><td>HCV 4</td></tr> <tr> <td>Chaah Estate</td><td>Water catchment P 02D</td><td>1.61</td><td>HCV 4</td></tr> <tr> <td>Chaah Estate</td><td>Bund P03C</td><td>4.87</td><td>HCV 4</td></tr> <tr> <td>N Labis Estate</td><td>Water Catchment</td><td>0.85</td><td>HCV 4</td></tr> </tbody> </table>	Estate	Description	Ha	Type	Sg Spg Kiri	Water catchment P06	0.32	HCV 4	Sg Spg Kiri	River reserve Sg Spg Kiri P04	8.94	HCV 4	Sg Spg Kiri	Bund P00	53.85	HCV 4	Chaah Estate	Water catchment P 04A	0.47	HCV 4	Chaah Estate	Water catchment P 02D	1.61	HCV 4	Chaah Estate	Bund P03C	4.87	HCV 4	N Labis Estate	Water Catchment	0.85	HCV 4	
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N Labis Estate	River Reserve Sg Gatom	0.78	HCV 4								
Total		70.69									
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable	Not Applicable								
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The HCV re-assessment was compiled by GSD (Previously known as PSQM) on Sept 2016 for Estates of SOU 20. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <p>a) Overview of HCV assessment</p> <p>b) Description of assessment area</p> <ul style="list-style-type: none"> - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values <p>c) HCV criteria & application to agriculture</p> <ul style="list-style-type: none"> - Visual observation & supporting information 	Complied								

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		<ul style="list-style-type: none"> - Wildlife in plantation - decision on HCV status <p>d) HCV management / Monitoring.</p> <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein.</p> <p>All areas were sighted and verified. Hectare for the re-categorized areas has not affected the others category including the planted areas. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.</p>	
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	The audit findings have confirmed that there is no rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018 in SOU 20 estates. Hence, the requirement under this indicator does not apply.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	<p>The HCV re-assessment was compiled by GSD (Previously known as PSQM) on Sept 2016 for Estates of SOU 20. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ul style="list-style-type: none"> a) Overview of HCV assessment b) Description of assessment area 	Complied

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		<ul style="list-style-type: none"> - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values <p>c) HCV criteria & application to agriculture</p> <ul style="list-style-type: none"> - Visual observation & supporting information - Wildlife in plantation - decision on HCV status <p>d) HCV management / Monitoring.</p> <p>All the HCVs were maintained by the management of estates and mill. This exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented.</p> <p>No RTE species identified in the estates visited as per Addendum to High conservation value, Final Report for Strategic Operating Unit 20, ver. 2.0 dated Sept 2016. The monitoring was done monthly by respective estates.</p> <p>A programme to regularly educate the workforce about the status of RTE species is in place and carried out on annual basis. For example at Chaah Estate the latest training was carried out on 17/08/2024 on HCV and riparian reserve topic.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>SOU 20 Chaah certification unit has established a standard monitoring document. Details provided include the following information;</p> <p>a) Area</p>	Complied

		<p>b) Field no. and GPS coordinate</p> <p>c) Observation</p> <ul style="list-style-type: none">- Encroachment /sign of trespassing- Wildlife issues/conflicts/sighting- Pollution /erosion issues <p>d) Maintenance of signage / fence</p> <p>The monitoring being made by the AP during the security rounds in the estate complex. The field staff/Assistant also played a role in providing information during their daily rounds in the fields. Records furnished by the APs were sighted and verified.</p> <table><tr><th></th><th>Action steps</th><th>Action Plan</th><th>Date</th><th>PIC</th></tr><tr><td>1</td><td>Inspection of HCV</td><td>Continuous inspection and recommendation To liase with related agency</td><td>On-going</td><td>Estate mgmt</td></tr><tr><td>2</td><td>Protection or conservation & monitoring of biodiversity area.</td><td>To continuously collaborate with R& D to monitor the status & health of trees</td><td>On-going</td><td>Estate mgmt</td></tr><tr><td>3</td><td>Protection & conservation of mangrove forests area.</td><td>To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.</td><td>On-going</td><td>Estate mgmt</td></tr></table>		Action steps	Action Plan	Date	PIC	1	Inspection of HCV	Continuous inspection and recommendation To liase with related agency	On-going	Estate mgmt	2	Protection or conservation & monitoring of biodiversity area.	To continuously collaborate with R& D to monitor the status & health of trees	On-going	Estate mgmt	3	Protection & conservation of mangrove forests area.	To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.	On-going	Estate mgmt	
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		<table><tr><td>5</td><td>Rehabilitation & habitat enhancement</td><td>To participate in tree planting divers tree species to enhance the surrounding biodiversity.</td><td>On-going</td><td>Estate mgmt</td></tr><tr><td>6</td><td>Interface with animals</td><td>Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with Jabatan Perhilitan on wildlife encounter/discovery</td><td>On-going</td><td>Estate mgmt</td></tr><tr><td>7</td><td>Education and awareness</td><td>Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming</td><td>On-going</td><td>Estate mgmt</td></tr></table> <p>No RTE species identified in the estate visited as per Addendum to High conservation value, Final Report for Strategic Operating Unit 4, ver. 2.0 dated July 2020. The monitoring was done monthly by respective estates.</p>	5	Rehabilitation & habitat enhancement	To participate in tree planting divers tree species to enhance the surrounding biodiversity.	On-going	Estate mgmt	6	Interface with animals	Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with Jabatan Perhilitan on wildlife encounter/discovery	On-going	Estate mgmt	7	Education and awareness	Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming	On-going	Estate mgmt	
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7.12.8	<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 20 estates. 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 **Chaah Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

Emission per product	tCO ₂ e/tProduct
CPO	1.56
PKO	0

Extraction	%
OER	19.55
KER	5.22

Production	t/yr
FFB Process	100,071.22
CPO Produced	19,566.92
PKO Produced	5,221.56

Land Use	Ha
OP Planted Area	13,518.11
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	13,518.11

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	57,490.74	0.85	21,212.37	0.65	0.00	0.00	78,703.12	1.50
CO ₂ Emission from fertilizer	5,624.66	0.08	1,853.72	0.06	0.00	0.00	7,478.38	0.14
NO ₂ Emission	2,923.45	0.04	965.95	0.03	0.00	0.00	3,889.40	0.07
Fuel Consumption	464.51	0.01	214.29	0.01	0.00	0.00	678.80	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-52,751.63	-0.78	-20,083.85	-0.61	0	0	-72,835.48	-1.39
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	13,751.74	0.02	4,162.48	0.13	0.00	0.00	17,914.22	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	19,615.65	0.20
Fuel Consumption	17.74	0.00
Grid Electricity Utilization	1,080.76	0.01
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	20,714.15	0.21

Summary of Kernel Crusher Emission and Credit (if applicable)

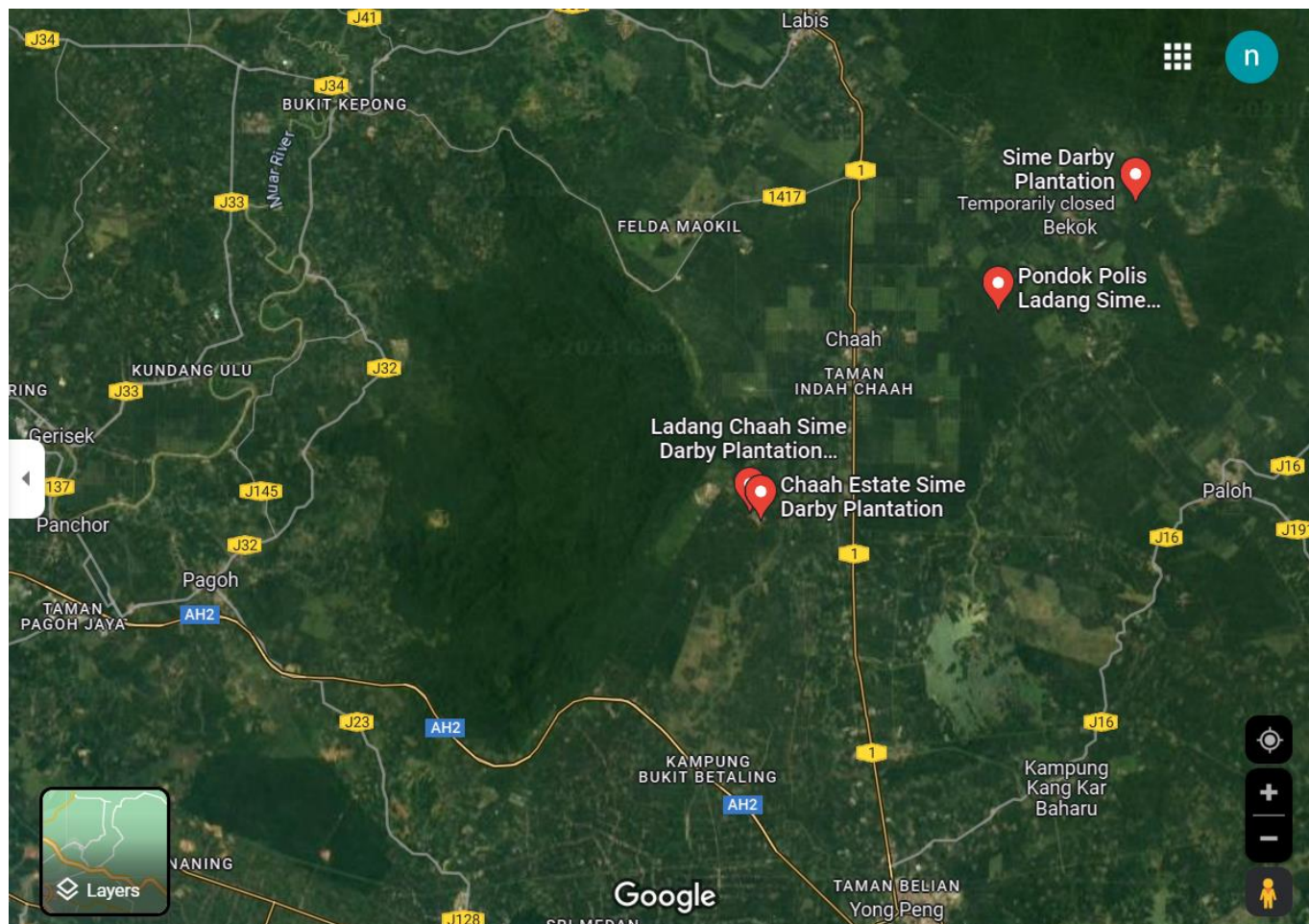
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

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

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

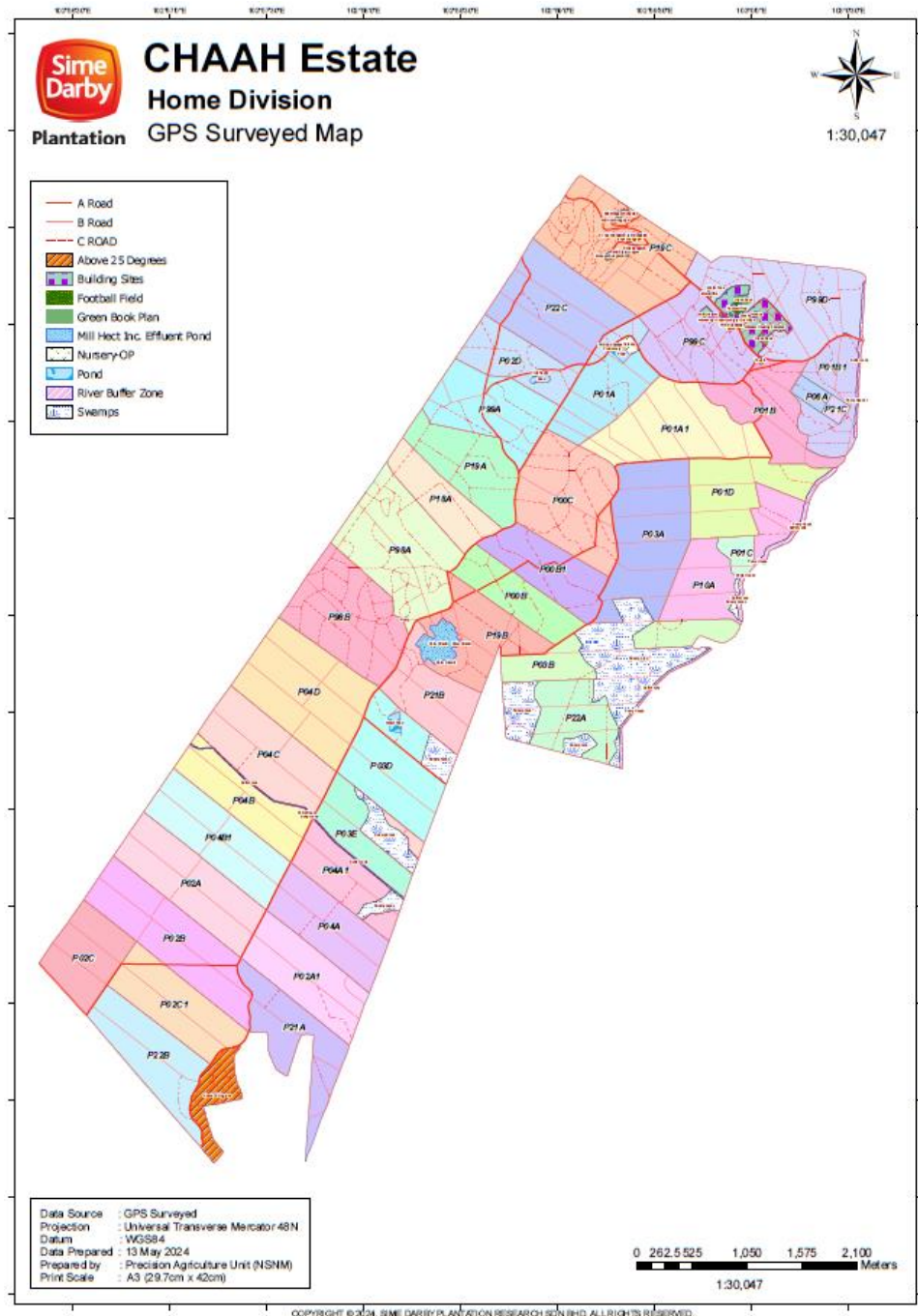
Appendix C: Location Map of Certification Unit and Supply bases



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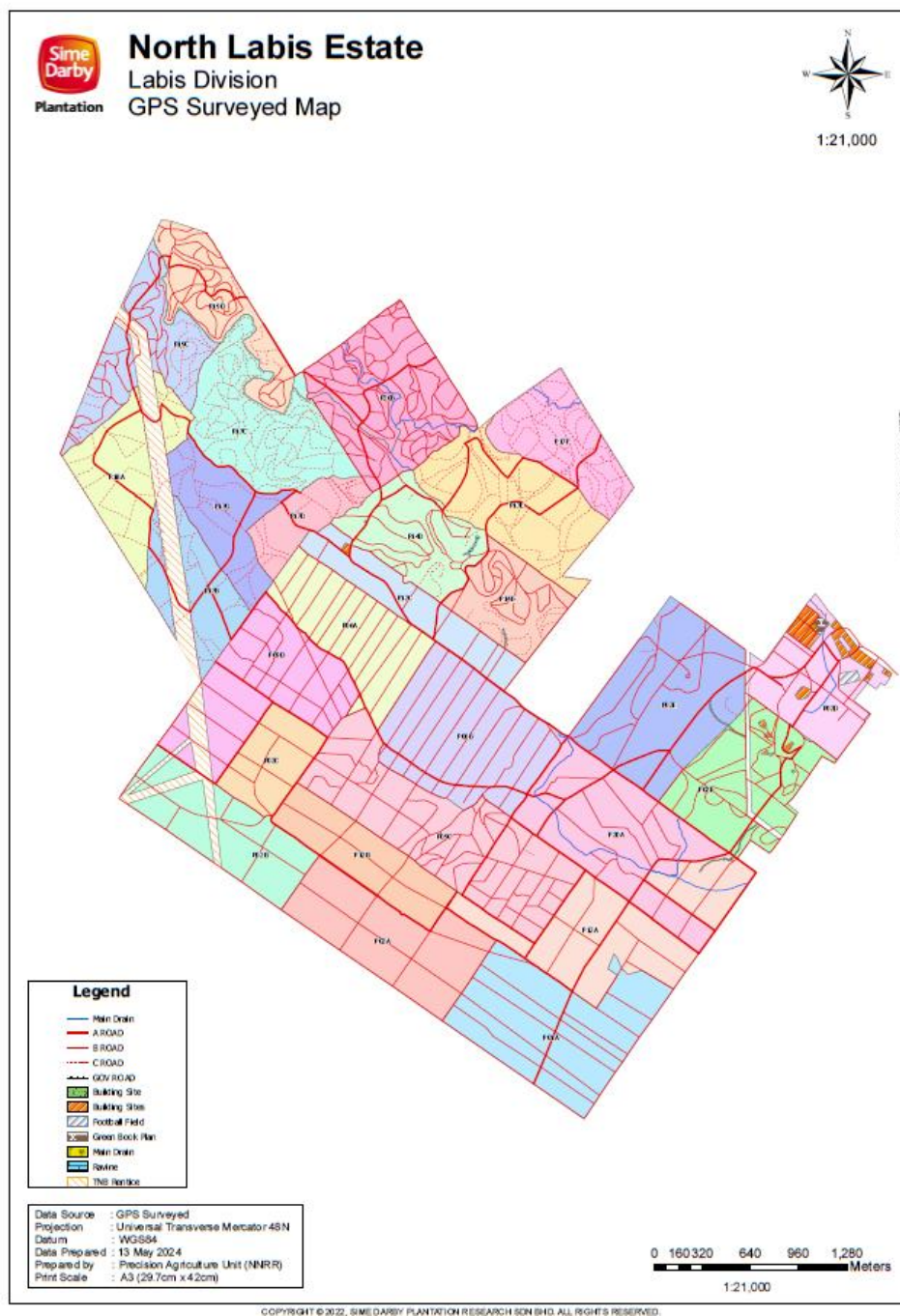
Appendix D: Estate Field Map

Chaah Estate



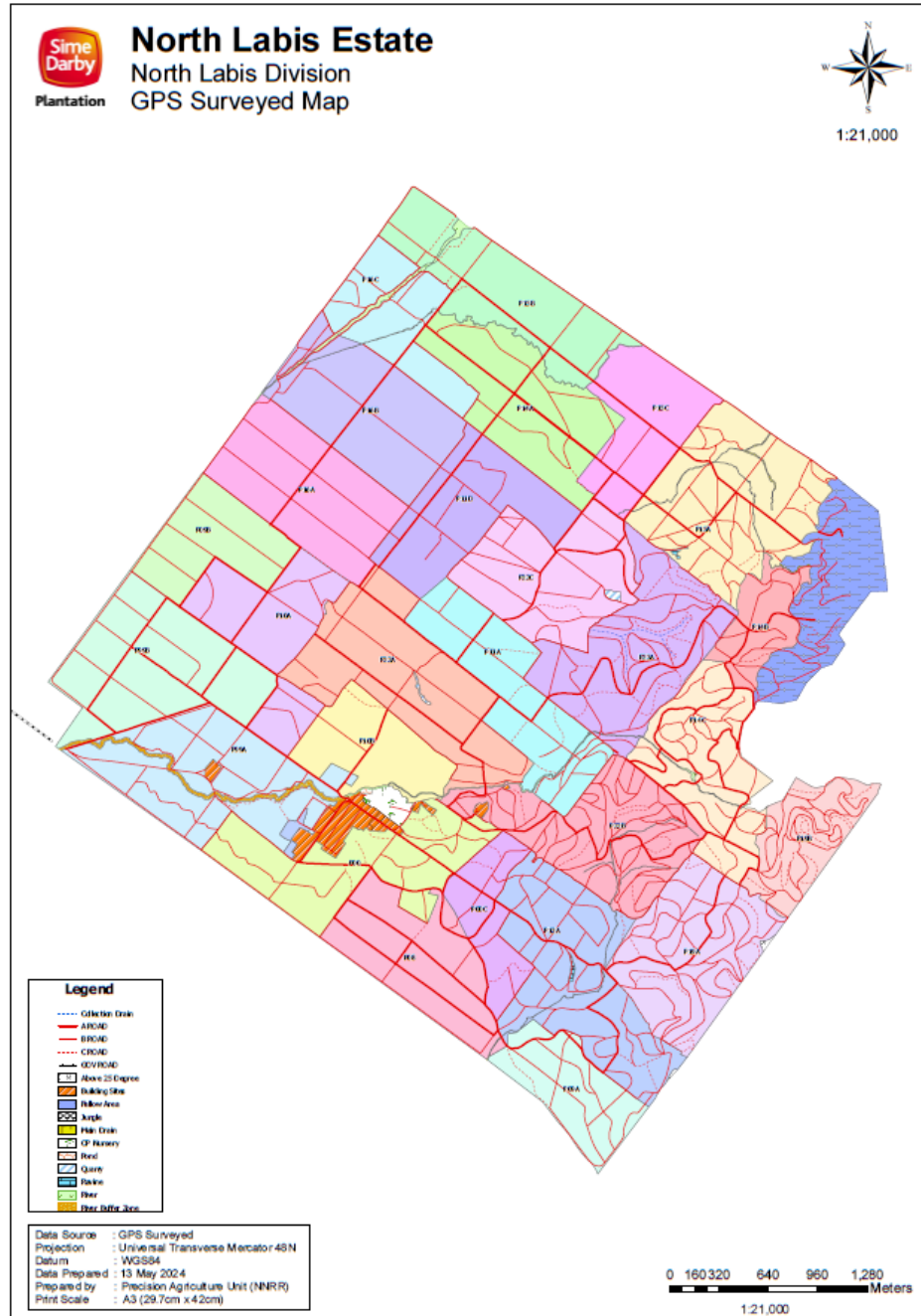
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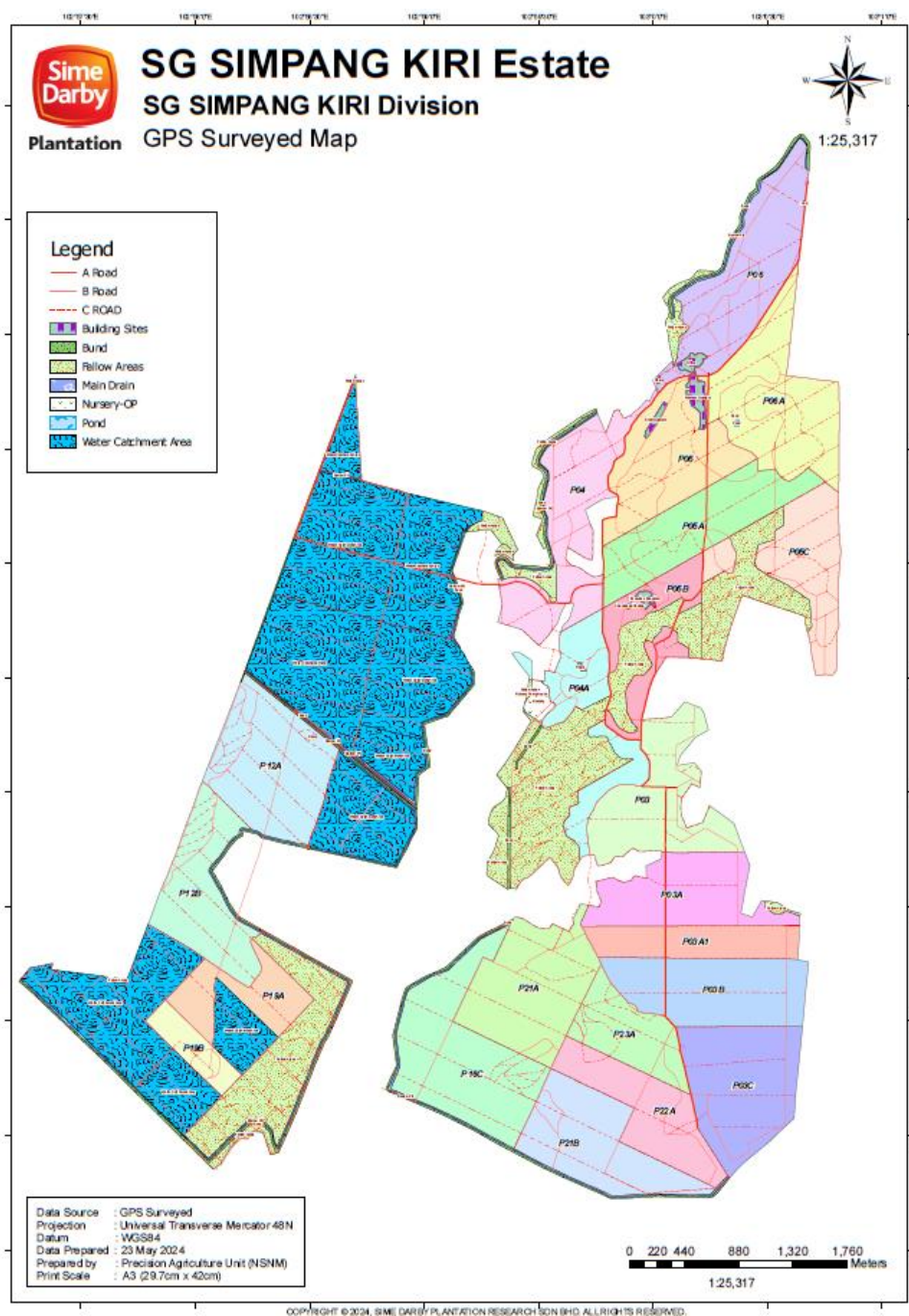
North Labis Estate



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North Labis Estate



Sg. Simpang Kiri Estate

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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	N/A	N/A	N/A
Number of samples	N/A	N/A	N/A
Remarks	N/A	N/A	N/A

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			
Total					N/A	N/A	N/A		
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