

## RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☒ Annual Surveillance Assessment (2\_1)

☐ Recertification Assessment (Choose an item.)

☐ Extension of Scope

**Client Company Name / Parent Company:**

**SD Guthrie Berhad**

(previously known as Sime Darby Plantation Berhad)

Client Company / Parent Company Address:

Level 11, Main Block, SD Guthrie Tower, No. 2, Jalan PJU 1A/7, Ara Damansara,  
47301 Petaling Jaya, Selangor, Malaysia.

Certification Unit:

**Strategic Operating Unit (SOU 19) - Pagoh Palm Oil Mill**

Location of Certification Unit:

Lot 2159, Ladang Pagoh, Mukim Jalan Bakri, Muar, 84309 Johor, Malaysia

Date of Final Report:

05/12/2024

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## Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SD Guthrie Berhad ( <i>previously known as Sime Darby Plantation Berhad</i> )		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 11, Main Block, SD Guthrie Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia.		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 19) – Pagoh Palm Oil Mill		
Location / Address	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri, 84309 Muar, Johor, Malaysia.		
Website	<a href="https://www.sdguthrie.com/">https://www.sdguthrie.com/</a>		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD)  Noor Rizman Kasmuri (Mill Manager)	E-mail	<a href="mailto:shylaja.vasudevan@sdguthrie.com">shylaja.vasudevan@sdguthrie.com</a>  <a href="mailto:kks.pagoh@sdguthrie.com">kks.pagoh@sdguthrie.com</a>
Telephone	+60 3-7848 4000	Facsimile	+60 3-7848 5360

2. Certification Information			
Certificate Number	RSPO 600305	Certificate Start Date	28/01/2024
Date of First Certification	28/01/2014	Certificate Expiry Date	27/01/2029
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> <li>Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory, and contractual requirements.</li> </ul>		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	45 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 685822	MS 2530-3:2013 – MSPO Part 3: General Principles for Oil Palm Plantations and Organised Smallholders	BSI Services Malaysia Sdn Bhd	11/12/2027
MSPO 682037	MS 2530-4:2013 – MSPO Part 4: General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	11/12/2027
MSPO 714136	MSPO Supply Chain Certification Standard 2018	BSI Services Malaysia Sdn Bhd	11/12/2027

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Pagoh Palm Oil Mill	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri, 84309 Muar, Johor, Malaysia	2° 04' 40.62" N	102° 43' 07.30" E
Pagoh Estate	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri, 84309 Muar, Johor, Malaysia	2° 04' 40.62" N	102° 43' 07.30" E
Lanadron Estate	Panchor, 84500 Muar, Johor, Malaysia	2° 10' 48.70" N	102° 44' 04.00" E
Pengkalan Bukit Estate	Mukim Jalan Bakri, 84309 Muar, Johor, Malaysia	2° 07' 29.80" N	102° 44' 32.00" 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
Pagoh Estate	* 2,046.70	9.10	** 275.94	*** 2,331.74	87.78
Lanadron Estate	1,561.96	19.41	117.22	1,698.59	91.96
Pengkalan Bukit Estate	2,935.92	2.87	173.62	3,112.41	94.33
<b>Total</b>	<b>6,544.58</b>	<b>31.38</b>	<b>566.78</b>	<b>7,142.74</b>	<b>91.63</b>

**Note(s):**

Pagoh Estate:

- (1) \* Total planted is 2,046.70 hectare, which is tallied with the total planted area declared in the MPOB License. Therefore, there is no new planting in the estate.
- (2) \*\* The Infrastructure & Other area has decreased 52.87 hectare compared to previous assessment (RA 2) due to latest survey conducted by internal GIS team of SD Guthrie in Jan 2024.
- (3) \*\*\* The actual total area Pagoh Estate is 2,331.74 hectare as per HRVRM029 (internal hectares statement – latest updated in September 2024).

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Pagoh Estate	139.10	1,370.78	536.82	0.00	1,907.60	139.10
Lanadron Estate	113.00	834.83	614.13	0.00	1,448.96	113.00
Pengkalan Bukit Estate	444.87	1,719.84	771.21	0.00	2,491.05	444.87
<b>Total (ha)</b>	<b>696.97</b>	<b>3,925.45</b>	<b>1,922.16</b>	<b>0.00</b>	<b>5,847.61</b>	<b>696.97</b>
<b>Note:</b> 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 (Jan 2024 – Dec 2024)	Actual (Oct 2023 – Sept 2024)		Forecast (Jan 2025 – Dec 2025)
		Previous License Period (Oct 2023 – Dec 2023)	Current License Period (Jan 2024 – Sept 2024)	
Pagoh Estate	30,847.56	9,063.30	34,781.99	41,150.00
Lanadron Estate	28,000.00	10,288.57	34,583.66	34,750.00
Pengkalan Bukit Estate	50,966.95	7,499.99	26,356.89	52,100.00
<b>Total</b>	<b>109,814.51</b>	<b>122,574.40</b>		<b>128,000.00</b>
<b>Note:</b> The RSPO Secretariat has approved Extension of Volume requested by the UoC management with the details as below:				
	<b>FFB Estates</b>	<b>CSPO</b>	<b>CSPK</b>	
Approved Extension of Volume (MT)	36,500.00	7,500.00	1,850.00	
<b>Total Approved Volume (MT)</b>	<b>146,314.51</b>	<b>31,439.56</b>	<b>7,340.72</b>	

8. Summary of Certified Tonnage of FFB (from other Certified Unit(s))				
Estate / Smallholders	Tonnage (MT) / Year			
	Estimated Last Year (Jan 2024 – Dec 2024)	Actual (Oct 2023 – Sept 2024)		Forecast (Jan 2025 – Dec 2025)
		Previous License Period (Oct 2023 – Dec 2023)	Current License Period (Jan 2024 – Sept 2024)	
Kempas Estate		0.00	3,251.66	
Sepang Estate		0.00	95.60	
Welch Estate		0.00	37.81	
Tangkah Estate		0.00	1,604.67	
Serkam Estate		0.00	1,158.14	

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Total	6,147.88
<b>Note(s):</b> (1) Sepang Estate certified under Strategic Operating Unit (SOU 8) – East Palm Oil Mill (Certificate No. RSPO 543543, valid until 18/05/2025) (2) Kempas Estate, Tangkah Estate, and Serkam Estate certified under Strategic Operating Unit (SOU 17) – Kempas Palm Oil Mill (Certificate No. RSPO-PC 00101, valid until 19/05/2025) (3) Welch Estate certified under Strategic Operating Unit (SOU 18) – Diamond Jubilee Palm Oil Mill (Certificate No. RSPO 591224, valid until 04/10/2026)	

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated Last Year (Jan 2024 – Dec 2024)	Actual (Oct 2023 – Sept 2024)		Forecast (Jan 2025 – Dec 2025)
		Previous License Period (Oct 2023 – Dec 2023)	Current License Period (Jan 2024 – Sept 2024)	
Ax Gxxxxx	-	0.00	0.00	-
Axx Pxxxx & Pxxxx	-	0.00	584.18	-
Bxxxx Exxxxx	-	0.00	455.77	-
Bx Rxxxxx & Pxxxxxxxx	-	0.00	42.89	-
Exxxxxxxx Pxxxxx	-	0.00	1,384.49	-
Exxxxx Exxxxx	-	0.00	381.35	-
Exx Hxxx Lxxxx	-	2,008.37	10,323.99	-
Gxx Exxxxx	-	126.74	531.54	-
Jxxxx Lxxx	-	307.98	162.11	-
Kxxxxx Sxxxx Txx Hxx	-	3,084.97	18,414.85	-
Kxxxxxx Mxxxx	-	574.79	191.71	-
Pxxxxxxxxx Pxxxxxx	-	0.00	2,284.21	-
Sxx Cxxx Jxx	-	2,038.09	6,337.38	-
<b>Total</b>	-	<b>49,235.41</b>		-

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	October 2023	11,436.17	3,884.66	15,320.83
2	November 2023	6,140.40	1,374.53	7,514.93
3	December 2023	9,275.29	2,881.75	12,157.04

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4	January 2024	8,123.89	3,378.72	11,502.61
5	February 2024	7,545.88	4,027.22	11,573.10
6	March 2024	8,146.81	3,882.55	12,029.36
7	April 2024	9,393.09	5,356.65	14,749.74
8	May 2024	12,070.56	4,221.61	16,292.17
9	June 2024	11,980.56	4,399.72	16,380.28
10	July 2024	13,682.88	7,079.38	20,762.26
11	August 2024	13,417.15	5,388.42	18,805.57
12	Sept 2024	17,509.60	3,360.20	20,869.80
<b>Total</b>		<b>128,722.28</b>	<b>49,235.41</b>	<b>177,957.69</b>

10. Summary of Certified Tonnage (MT) (not applicable for ISS)				
Estimated Last Year (Jan 2024 – Dec 2024)	Actual (Oct 2023 – Sept 2024)		Forecast (Jan 2025 – Dec 2025)	
	Previous License Period (Oct 2023 – Dec 2023)	Current License Period (Jan 2024 – Sept 2024)		
FFB	FFB		FFB	
109,814.51 mt	26,851.86 mt	101,870.42 mt	128,000.00 mt	
	Total	128,722.28 mt		
CPO (OER: 21.80%)	CPO (OER: 19.05%)		CPO (OER: 20.51%)	
23,939.56 mt	5,149.46 mt	19,368.22 mt	26,250.00 mt	
	Total	24,517.68 mt		
PK (KER: 5.01%)	PK (KER: 4.81%)		PK (KER: 5.00%)	
5,490.72 mt	1,351.90 mt	4,845.53 mt	6,400.00 mt	
	Total	6,197.43 mt		
Note: The RSPO Secretariat has approved Extension of Volume requested by the UoC management with the details as below:				
	FFB Estates	CSPO	CSPK	
Approved Extension of Volume (MT)	36,500.00	7,500.00	1,850.00	
Total Approved Volume (MT)	146,314.51	31,439.56	7,340.72	

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<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	October 2023	2,198.06	583.08
2	November 2023	1,167.00	306.82
3	December 2023	1,784.40	462.00
4	January 2024	1,554.72	365.29
5	February 2024	1,458.42	360.88
6	March 2024	1,558.80	415.20
7	April 2024	1,758.29	472.95
8	May 2024	2,255.52	575.42
9	June 2024	2,239.10	528.23
10	July 2024	2,635.36	670.17
11	August 2024	2,472.85	644.94
12	Sept 2024	3,435.16	812.46
<b>Total</b>		<b>24,517.68</b>	<b>6,197.43</b>

<b>11. Summary of Actual Volume sold</b>					
<b>Current License Period (Jan 2024 – Sept 2024)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>Others</b>		
<b>CPO (MT)</b>	1,825.12	0.00	0.00	17,062.93	18,888.05
<b>PK (MT)</b>	1,101.09	0.00	0.00	2,956.55	4,057.64
<b>Credits</b>	0.00	0.00	0.00	0.00	0.00
<b>Previous License Period (Oct 2023 – Dec 2023)</b>					
<b>CPO (MT)</b>	945.65	0.00	0.00	4,596.20	5,541.85
<b>PK (MT)</b>	571.39	0.00	0.00	973.22	1,544.61
<b>Credits</b>	0.00	0.00	0.00	0.00	0.00
<b>Note:</b> Conventional is RSPO certified material but sold as non-RSPO.					



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<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>Certified CPO Sold (MT)</b>	<b>Certified PK Sold (MT)</b>
1	Buyer A	TR-3b2bd434-b19d TR-5b74453f-ad49 TR-3c479d5d-8187 TR-f9469f31-a626	847.19	0.00
2	Buyer B	TR-609393d7-507c TR-9dc4c23b-fb69 TR-781cf0f6-7682 TR-d869ad99-3685 TR-2c148d88-4443 TR-7eed43e9-d61d TR-72f8058f-4059 TR-25185516-3f26 TR-3d170945-6935 TR-1a9211bc-774a TR-339465d2-a00d TR-07c2fa1b-7d77	1,923.58	0.00
3	Buyer C	TR-0586e825-9b03 TR-3190de60-4910 TR-3c78db20-b44e TR-401b6647-407d TR-164a4ed5-8c24 TR-b9a03ece-5a2a TR-2b9d31ff-c3dc TR-ea07b45b-ff4a TR-030d23d1-3e29 TR-7446c129-d5e7 TR-162dbe28-87c4 TR-696faf4b-8556 TR-b2209ba6-3cdd	0.00	1,672.48
<b>Total</b>			<b>2,770.77</b>	<b>1,672.48</b>

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

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	CPO Customer 1	21,659.13	0.00
2	PK Customer 1	0.00	3,929.77
Total		21,659.13	3,929.77

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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated Last Year (Jan 2024 – Dec 2024)			Actual (Oct 2023 – Sept 2024)			Forecast (Jan 2025 – Dec 2025)		
	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
<b>TOTAL</b>		<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>Note:</b> 1 mt = 1 credit						

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

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

## Section 2: Assessment Process

### Certification Body:

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

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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Representative: Dr. Chaiyaporn Seekao ([Chaiyaporn.Seekao@bsigroup.com](mailto:Chaiyaporn.Seekao@bsigroup.com))

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **07/10/2024 – 10/10/2024**. 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 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 was based on the formula  $(\sqrt{y}) \times (z)$ ; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

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

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

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

## RSPO P&C Public Summary Report

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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)
Pagoh POM	√	√	√	√	√
Pagoh Estate	√	√	√	√	√
Lanadron Estate	√	√	√	√	√
Pengkalan Bukit Estate	√	√	√	√	√

**Tentative Date of Next Visit: October 6, 2025 - October 9, 2025**

**Total Number of Mandays: 12 Mandays**

## 2.2 BSI Assessment Team

Name	Role	Competency
Mohamad Amirul Saifullah bin Mohamad Senan (MAS)	Team Leader	<p><b>Education:</b> Holds a Bachelor of Agricultural Science from Universiti Putra Malaysia.</p> <p><b>Work Experience:</b> 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. 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&amp;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>

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		<p><b>Training attended:</b> Attended, completed and passed ISO 9001:2015 Lead Auditor Course (CQI-IRCA certified), ISO 45001:2018 Lead Auditor Course (CQI-IRCA certified), RSPO P&amp;C Lead Auditor Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification Training Course (endorsed by RSPO Secretariat), RSPO P&amp;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 &amp; Basic Auditor Course, and HCV-HCSA Assessor Training Course.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Malaysia and English languages.</p> <p><b>Aspect covered in this audit:</b>  <input checked="" type="checkbox"/> Good Agriculture Practice   <input checked="" type="checkbox"/> Health and Safety   <input checked="" type="checkbox"/> Supply Chain requirements   <input type="checkbox"/> Social   <input type="checkbox"/> Environmental   <input checked="" type="checkbox"/> Market Communication and Claim requirements   <input type="checkbox"/> ISH Context (ICS, Internal Audit, Policy, Business Planning and Trading System)</p>
Mohamed Hidhir Zainal Abidin (MHZ)	Team Member	<p><b>Education:</b> Bachelor Degree in Chemical Engineering, National University of Malaysia, 2006</p> <p><b>Work Experience:</b>  (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> <p><b>Training attended:</b>  (1) ISO 9001 Lead Auditor Course  (2) ISO 14001 Lead Auditor Course  (3) OHSAS 18001 Lead Auditor Course in 2012  (4) Endorsed RSPO P&amp;C Lead Auditor Course in 2013  (5) MSPO Awareness Training in 2014  (6) Endorsed RSPO SCCS Lead Auditor Course  (7) SMETA Auditor training</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p><b>Aspect covered in this audit:</b>  <input type="checkbox"/> Good Agriculture Practice   <input type="checkbox"/> Health and Safety   <input type="checkbox"/> Supply Chain requirements   <input checked="" type="checkbox"/> Social   <input type="checkbox"/> Environmental   <input type="checkbox"/> Market Communication and Claim requirements   <input type="checkbox"/> ISH Context (ICS, Internal Audit, Policy, Business Planning and Trading System)</p>

Ahmad Rufi Bin Abu Talib Khan (ARK)	Team Member	<p><b>Education:</b> Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015</p> <p><b>Work Experience:</b> He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years' experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering all over Malaysia</p> <p><b>Training attended:</b> He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course.</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English</p> <p><b>Aspect covered in this audit:</b>  <input type="checkbox"/> Good Agriculture Practice   <input type="checkbox"/> Health and Safety   <input type="checkbox"/> Supply Chain requirements   <input type="checkbox"/> Social   <input checked="" type="checkbox"/> Environmental   <input type="checkbox"/> Market Communication and Claim requirements   <input type="checkbox"/> ISH Context (ICS, Internal Audit, Policy, Business Planning and Trading System)</p>
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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	MAS	MHZ	ARK
Monday, 07/10/2024  Lanadron Estate	0730	Travel to Lanadron Estate	√	√	√
	0830 – 0930	Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit Team Leader</li> <li>Confirmation of Assessment Scope and finalize Audit Plan</li> </ul>	√	√	√
	0930 – 1230	<u>Lanadron Estate</u> 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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Date	Time	Subjects	MAS	MHZ	ARK
	1030 – 1230	<u>Lanadron Estate</u> Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	–	✓	–
	1230 – 1330	Lunch break	✓	✓	✓
	1330 – 1700	<u>Lanadron Estate</u> Document Assessment P1 – P7: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1700 – 1730	<u>Lanadron Estate</u> • Auditors' discussion • Day 1 Interim Closing Briefing	✓	✓	✓
Tuesday, 08/10/2024  Pengkalen Bukit Estate	0900 – 1300	<u>Pengkalen Bukit Estate</u> 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.	✓	✓	✓
	1030 – 1230	<u>Pengkalen Bukit Estate</u> Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	–	✓	–
	1300 – 1400	Lunch break	✓	✓	✓
	1400 – 1730	<u>Pengkalen Bukit Estate</u> Document Assessment P1 – P7: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1730 – 1800	<u>Pengkalen Bukit Estate</u> • Auditors' discussion • Day 2 Interim Closing Briefing	✓	✓	✓



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Date	Time	Subjects	MAS	MHZ	ARK
Wednesday 09/10/2024  Pagoh POM	0900 – 1300	<u>Pagoh POM</u> Mill visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc.	✓	✓	✓
	1030 – 1230	<u>Pagoh POM</u> Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	–	✓	–
	1300 – 1400	Lunch break	✓	✓	✓
	1400 – 1730	<u>Pagoh POM</u> Document Assessment P1 – P7: SOPs, assessment on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation and RSPO SCC general requirements, supply chain for CPO mill, Market Communication and Claim requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	✓	✓
	1730 – 1800	<u>Pagoh POM</u> <ul style="list-style-type: none"> <li>Auditors' discussion</li> <li>Day 3 Interim Closing Briefing</li> </ul>	✓	✓	✓
Thursday 10/10/2024  Pagoh Estate	0900 – 1300	<u>Pagoh Estate</u> 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.	✓	✓	✓
	1030 – 1230	<u>Pagoh Estate</u> Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	–	✓	–
	1300 – 1400	Lunch break	✓	✓	✓

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Date	Time	Subjects	MAS	MHZ	ARK
	1400 – 1630	<u>Pagoh Estate</u> Document Assessment P1 – P7: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 – 1700	<ul style="list-style-type: none"> <li>• Auditors' discussion</li> <li>• Closing Meeting preparation</li> </ul>	✓	✓	✓
	1700 – 1800	Closing Meeting <ul style="list-style-type: none"> <li>• Closing Presentation by Audit Team Leader</li> <li>• to summarize the audit conclusions, audit findings, and make recommendations on certification.</li> </ul>	✓	✓	✓

## 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 ( <i>previously known as Sime Darby Plantation Berhad</i> ) 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, under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI):  <a href="https://www.sdguthrie.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/">https://www.sdguthrie.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</a>	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 ( <i>previously known as Sime Darby Plantation Berhad</i> ) 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 ( <i>previously known as Sime Darby Plantation Berhad</i> ) 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
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	<p><u>Indonesia</u></p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- PT Mitral Austral Sejahtera: The properties were sold and currently SD Guthrie Berhad (<i>previously known as Sime Darby Plantation Berhad</i>) 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.</li> </ul> <p><u>Malaysia</u></p> <ul style="list-style-type: none"> <li>- Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate has been transferred to SOU Lavang.</li> <li>- Bintang Oil Mill: SD Guthrie Berhad (<i>previously known as Sime Darby Plantation Berhad</i>) 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.</li> </ul> <p><u>Papua New Guinea</u></p> <ul style="list-style-type: none"> <li>- Markham Farming Company Limited (MFCL)/ Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: <a href="http://www.rspo.org/certification/public-announcement">www.rspo.org/certification/public-announcement</a></li> </ul> <p><u>Liberia</u></p> <ul style="list-style-type: none"> <li>- As at 16/01/2020, SD Guthrie Berhad (<i>previously known as Sime Darby Plantation Berhad</i>) 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): <a href="https://sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/">https://sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</a>.</li> </ul>	Complied

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	ACOP 2023 has been cross-referenced as below: <a href="https://rspo.org/members/1-0008-04-000-00/">https://rspo.org/members/1-0008-04-000-00/</a>	
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.	Complied
<b>Un-Certified Units or Holdings</b>		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/2023.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within SD Guthrie Berhad that have completed NPP notification:</p> <p>(1) NBPOL (Poliamba Limited) 23/05/2020 – no comments <a href="https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/">https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</a></p> <p>(2) NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/ 2018 – no comments <a href="https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/">https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/</a></p> <p>(3) NBPOL (Ramu Agri Industries Limited) 29/01/2018 – no comments <a href="https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/">https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</a></p> <p>(4) NBPOL (Ramu Agri Industries Limited) 02/09/2016 – no comments <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</a></p> <p>(5) NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</a></p> <p>(6) NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/">https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/</a></p>	Complied

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	<p>(7) NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/">https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/</a></p> <p>(8) NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/</a></p> <p>(9) NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</a></p> <p>(10) NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/">https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</a></p> <p>(11) NBPOL (Ramu Agri Industries Ltd) 06/03/2012 – no comments captured in RSPO website: <a href="https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/">https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</a></p> <p>(12) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</a></p> <p>(13) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</a></p> <p>(14) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</a></p> <p>Management units for 12 – 14 above were disposed.</p>	
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</p>	Complied

	<p>submitted. As of 04/09/2024, 19 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected management units) has been endorsed by RSPO.</p> <p>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;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 (<i>previously known as Sime Darby Plantation Berhad</i>) 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> <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 (<i>previously known as Sime Darby Plantation Berhad</i>) 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 (<i>previously known as Sime Darby Plantation Berhad</i>) 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</i></p>	Complied

	<i>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.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Each site maintains stakeholder engagement as part of its estate/mill operations, especially in Indonesia, where company socialization is emphasized. Details of the latest stakeholder consultation conducted at the UoC can be found in Criteria 1.1.	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 is no scheme smallholders and/or outgrowers include in the scope of certification. Hence, this requirement is not applicable.	Not Applicable



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**Approved Time Bound Plan**

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

### 3.3 Details of Nonconformities

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

During this Assessment there were zero (0) Critical; four (4) Minor nonconformities and zero (0) Opportunity For Improvement raised. The Strategic Operating Unit (SOU 19) – Pagoh 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 #	2559762-202410-N1	Issued Date	10/10/2024
Due Date	Next Assessment (ASA 2_2)	Closure Date	"Open"
Indicator & Category (Critical / Minor)	2.2.2 – Minor		
Statement of Nonconformity:	Evidence of legal due diligence of contracted third parties were not effectively demonstrated.		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p>(1) <u>Lanadron Estate</u> Salary payment records for workers under Kim Soon Lee Transport Sdn Bhd was paid in cash as per the following details: August 2024 salary (nett), local worker</p> <p>i) Mxxx Fxxxx Bin Bxxxx: RM 1,138.83, payment voucher dated 7/09/2024 ii) Mxxxxxxx Hxxxxxx Bin Sxxxx: RM 1,253,51, payment voucher dated 7/09/2024 iii) Mxxxxxxx Rxxxxx Bin Sxxxxxxxx: RM 1,238,83, payment voucher dated 7/09/2024</p> <p>(2) <u>Pengkalan Bukit Estate</u> July - September 2024 salary (nett) Salary for one (1) foreign worker [Nxxxxx, C9005915] under MASSK Enterprise was paid in cash with evidence of payment voucher. Further verification made with the contractor has confirmed that the worker is still in progress of opening the bank account.</p> <p>Process to ensure compliance to legal is based on monthly due diligence records (Contractor Key Performance Indicator (KPI) Evaluation), which only focus on ESH legal and security procedures. Thus, the said issue was not thoroughly evaluated. The current practice was not in line with Employment Act 1955 (amendment 2022) under Section 25(1) - Wages to be paid through financial institution.</p>		

<b>Corrections:</b>	(1) OU has communicated with the contractors on the JTK requirements of wage payment method. (2) Contractors will change wage payment method for their workers to payment thru banking starting from October 2024.
<b>Root Cause Analysis:</b>	(1) Contractors are not aware of the JTK requirement regarding the wage payment method. (2) The monthly compliance monitoring by OU did not include monitoring the wage payment method.
<b>Corrective Actions:</b>	OU will include the monitoring of wage payment methods in the monthly contractor's compliance monitoring.
<b>Assessment Conclusion:</b>	The CAPs were accepted on 28/10/2024. The effective implementation of the corrective actions will be verified during next audit (ASA 2_2). Status "Open".

Non-conformity			
<b>NCR Ref #</b>	2559762-202410-N2	<b>Issued Date</b>	10/10/2024
<b>Due Date</b>	Next Assessment (ASA 2_2)	<b>Closure Date</b>	"Open"
<b>Indicator &amp; Category (Critical / Minor)</b>	3.4.2 – Minor		
<b>Statement of Nonconformity:</b>	Development of social management and monitoring plan was not effectively developed with participation of affected stakeholders.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p>Development of social management plan is based on the aspect identified for each specific category. For external stakeholders, inputs from engagement process through annual stakeholder meeting (per SOU basis) will used as basis/reference for development of management plan.</p> <p>At Pengkalan Bukit Estate, Social Management Plan dated 1/10/2024 has included all related issues for those attended the annual stakeholder meeting on 12/9/2024. An onsite consultation carried out with relevant stakeholders (contractor/vendor/OCP/school representative/villagers) to confirm any unresolved issues with SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) estates and mill. Village heads from Kg Seri Menanti, Kg Sebusu, Sari Baru and Panjang Sari highlighted a few issues with regards to flash flood/drain maintenance/road safety/social issue – burglary issue during the meeting.</p> <p>These issues have not been incorporated in the management plan for further monitoring and action. Process of ensuring representative participation of affected stakeholders in the development of management plan was not clearly demonstrated.</p>		
<b>Corrections:</b>	<p>(1) OU management met with all relevant stakeholders on 09/10/2024 to clarify and verify the highlighted issues regarding flash flood/drain maintenance/road safety/social issue - burglary issue.</p> <p>(2) OU management will review the social management plan to include the matters highlighted by the head of the village, along with the necessary action plan.</p>		

<b>Root Cause Analysis:</b>	OU management only uses the annual stakeholder meeting to capture any issues related to external stakeholders, including matters concerning the bordering villages. During the latest annual stakeholders meeting conducted by OU, the head of the village was unable to attend; hence, the issues highlighted were not captured in the social management plan.
<b>Corrective Actions:</b>	OU has established another platform for communication with external stakeholders, primarily with bordering villages, by using a group in the WhatsApp application. Any related issues with external stakeholders can be communicated via this application for further action by OU.
<b>Assessment Conclusion:</b>	The CAPs were accepted on 28/10/2024. The effective implementation of the corrective actions will be verified during next audit (ASA 2_2). Status "Open".

Non-conformity			
<b>NCR Ref #</b>	2559762-202410-N3	<b>Issued Date</b>	10/10/2024
<b>Due Date</b>	Next Assessment (ASA 2_2)	<b>Closure Date</b>	"Open"
<b>Indicator &amp; Category (Critical / Minor)</b>	7.8.1 – Minor		
<b>Statement of Nonconformity:</b>	The Water Management Plan established is not fully effective in promoting efficient use and continued availability of water sources.		
<b>Requirement Reference:</b>	<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>		
<b>Objective Evidence:</b>	<p>(1) Based on the documentation review, it is verified that the plan requires management to monitor water consumption. However, the water abstraction monitoring at Pagoh Division – Pengkalan Bukit Estate is ineffective due to the absence of installed monitoring tools.</p> <p>(2) Based on the records review, it is verified that Pengkalan Bukit Estate management conducts monthly water testing, with results consistently meeting the National Water Quality Standards set by the Ministry of Health (MOH). However, the established Water Management Plan does not include the activity of submitting these results to SPAN.</p>		
<b>Corrections:</b>	<p>(1) Pagoh Division – Pengkalan Bukit Estate</p> <p>(a) OU management will liaise with suppliers to provide a quotation for the installation of the water flow meter.</p> <p>(b) Water abstraction monitoring will use actual readings from the flow meter once its installation is completed.</p> <p>(2) Pengkalan Bukit Estate</p> <p>(a) The water test result was submitted to HQ for further submission to the SPAN system on 09/10/2024.</p>		

	(b) The water management plan will be reviewed to include the activity of submitting water test results for own water treatment to SPAN every six months for monitoring purposes.
<b>Root Cause Analysis:</b>	<p>(1) Pagoh Division – Pengkalan Bukit Estate Current OU management continues the previous practice of using estimation to measure water consumption for water abstraction monitoring. Hence, OU management was not aware of the requirement to install a measuring tool for water abstraction monitoring.</p> <p>(2) Pengkalan Bukit Estate The online system for SPAN (e-CLAPS) is managed by HQ. The PIC from OU will submit the water test results for the division using its own water treatment to HQ every six months. Since the submission is made to HQ, OU management did not include this activity in the water management plan, which has caused lapses in the submission.</p>
<b>Corrective Actions:</b>	<p>(1) Pagoh Division – Pengkalan Bukit Estate The requirement for water abstraction, as stated in the license, will be included in the water management plan for monitoring purposes.</p> <p>(2) Pengkalan Bukit Estate OU management will establish a monitoring form for the submission of water test results to SPAN every six months, including the planned date and actual date of submission."</p>
<b>Assessment Conclusion:</b>	The CAPs were accepted on 28/10/2024. The effective implementation of the corrective actions will be verified during next audit (ASA 2_2). Status "Open".

Non-conformity			
NCR Ref #	2559762-202410-N4	Issued Date	10/10/2024
Due Date	Next Assessment (ASA 2_2)	Closure Date	“Open”
Indicator & Category (Critical / Minor)	7.8.3 – Minor		
Statement of Nonconformity:	The process of mill effluent treated to be in compliance with national regulation is not fully effective.		
Requirement Reference:	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.		
Objective Evidence:	The mill has submitted the month reporting to DOE that include the effluent final discharge, schedule waste records, upstream and downstream water quality monitoring as per the compliance schedule requirement. However, from the record of submission of Effluent Final Discharge point from January 2024 until September 2024 as following:		
	Month		pH Value
	January 2024		8.30
	February 2024		9.20

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	March 2024	9.08	
	April 2024	9.50	
	May 2024	9.25	
	June 2024	9.05	
	July 2024	8.70	
	August 2024	9.10	
	September 2024	9.20	
	The limit set for pH in the compliance schedule is between 5.00 to 9.00. the records shown that the mill has exceeded the limit multiple times in the year 2024.		
Corrections:	Mill Management will consult the R&D Team on the high pH issue at the effluent final discharge and seek advice on increasing the dosage for PDV salt application.		
Root Cause Analysis:	<p>(1) The higher pH level at the effluent final discharge is attributed to the biogas commissioning in early 2024. The operation of the biogas system, which takes POME from the mill’s Effluent Treatment Plant Pond No. 2, causes longer retention time, leading to higher pH levels. As advised by R&amp;D, the mill applied PDV salt to lower the pH, but at a stagnant dosage.</p> <p>(2) The mill also sent effluent samples to an external accredited lab, in addition to the internal R&amp;D lab, as the long queue at the internal lab could affect the sample results. However, the mill did not manage to compare the results due to an inaccurate method (sending different sets of samples), thus causing ineffective monitoring of effluent sampling.</p>		
Corrective Actions:	<p>(1) Moving forward, the mill will change the effluent sampling method by taking the same set of effluent samples to be sent to both the R&amp;D lab at Carey Island and an external accredited lab to obtain more accurate results.</p> <p>(2) The mill will perform daily pH analysis at the effluent final discharge point to ensure the pH reading is within the limit prior to discharge.</p> <p>(3) Mill management will continuously consult with R&amp;D on the final discharge improvement plan to meet the parameters required by DOE and include the agreed plan in the environmental management plan.</p>		
Assessment Conclusion:	The CAPs were accepted on 28/10/2024. The effective implementation of the corrective actions will be verified during next audit (ASA 2_2). Status “Open”.		

## Opportunity for Improvements

OFI #	Description
OFI 1	N/A

## Positive Findings

PF #	Description
PF 1	The audit visit was well-organized, demonstrating the high level of commitment from the Sustainability Department and the designated unit personnel.
PF 2	Both internal and external stakeholders have maintained and emphasized a positive relationship.



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

Previous Audit Minor Non-conformity			
<b>NCR Ref #</b>	2404720-202310-N1	<b>Issued Date</b>	12/10/2023
<b>Due Date</b>	Next Assessment ASA2_1	<b>Closure Date</b>	10/10/2024
<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.2 – Minor		
<b>Statement of Nonconformity:</b>	Chemical Safety Management Procedure not consistently implemented.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.		
<b>Objective Evidence:</b>	<p>During site visit at Chemical store Pengkalan Bukit Estate, it was found the SDS chemical was available only 1 language either English or Bahasa Malaysia. Further verification at Workshop, Greases and Lubricant SDS was available in English language however based on interview found foreman was not able to understand the instruction in the SDS and prefer in Bahasa Malaysia. It was not in line with Chemical Safety Management Procedures dated 09/03/2021, Section 6.3.1(a) Chemicals supplied shall be furnished with complete and updated SDS. SDS shall be in English and Accepted national language.</p> <p>During site visit at Manuring Area Pagoh Estate, it was found that SDS for fertilizer NKC was not available in the field. It was not in line with Chemical Safety Management Procedures dated 09/03/2021, Section 6.2.2 (a) Transportation and handling of chemicals: Emergency equipment, i.e. first aid kit, soap, clean water and SDS. And 6.5 Handling of Chemicals cross with CHRA Recommendation 5.2.1 (d)(4) Continue to place SDS of the chemical used at the workplace and easily accessible.</p> <p>During site visit at Pagoh POM, it was found that the availability grease and lubricant used by contractor AXXX LXXX for maintenance work and temporary storage at Mill workshop. However, it was found this chemical not equipped with SDS. It was not in line with Chemical Safety Management Procedures dated 09/03/2021, Section 6.2.2 (a) Transportation and handling of chemicals: Emergency equipment, i.e. first aid kit, soap, clean water and SDS. And 6.5 Handling of Chemicals cross with CHRA Recommendation 5.2.1 (d)(4) Continue to place SDS of the chemical used at the workplace and easily accessible.</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. OU has displayed SDS that consist of two languages which are English and Malay in the chemical store and at the workshop.</li> <li>2. Management has provided extra copy of SDS which keep at store for mandore use and bring together at field during operation.</li> <li>3. Mill had immediately obtained the relevant SDS, printed it and displayed it at the temporary storage area.</li> </ol>		
<b>Root Cause Analysis:</b>	<p>The Chemical Safety Management Procedure not consistently implemented due to No monitoring from estate management to ensure the foreman and storekeeper understand about the importance of SDS. No monitoring from estate management especially to check manuring mandore bring together with the SDS during manuring activity and No monitoring from mill management especially for maintenance contractor which does not bring respective SDS for grease and lubricant as the contractor not aware to bring SDS to carried out overhaul work.</p>		

<b>Corrective Actions:</b>	<p><u>Pangkalan Bukit Estate</u></p> <ol style="list-style-type: none"> <li>1. Continuous monitoring by estate management to ensure all staff and mandore in charge understand the importance of SDS especially for storekeeper and foremen. Assistant Manager in charge will check from time to time to ensure staff in charge and upkeep mandore comply with the Chemical Safety Management Procedure</li> <li>2. Management will conduct annual training with training evaluation and frequent briefing on SDS understanding in both languages which are English and Malay.</li> </ol> <p><u>Pagoh Estate</u></p> <ol style="list-style-type: none"> <li>1. Refresher training with training evaluation on SDS given to all mandore on 10/10/23.</li> <li>2. Estate has made SDS booklet with pocket size for easy carry by mandore at field which endorse by estate manager.</li> <li>3. Daily reminder during morning muster by staff in charge and ensure the mandore bring together the SDS. Assistant Manager in charge will check from time to time to ensure staff in charge and upkeep mandore comply with the Chemical Safety Management Procedure.</li> </ol> <p><u>Pagoh Mill</u></p> <ol style="list-style-type: none"> <li>1. Mill will constantly check especially all contractor working at the mill premises to bring necessary SDS prior to start work. Respective PIC from Mill will check accordingly.</li> <li>2. Mill will give training with training evaluation to respective new contractor when conduct maintenance at the mill on the importance of SDS.</li> <li>3. A Working Instruction had been issued to Mill Executive, Mill Security and Maintenance team In-Charge to inspect all and ensure SDS is available and attached to Permit-To-Work for future jobs carried out by external contractors</li> </ol>
<b>Assessment Conclusion:</b>	<p>The implementation of the planned corrective actions has been verified to be sufficient and effective, as evidenced by the following:</p> <ol style="list-style-type: none"> <li>(1) Interviews with the Storekeeper and Foreman at Pengkalan Bukit Estate confirmed their understanding of the importance of Safety Data Sheets (SDS) in chemical handling. They also noted that the Assistant Manager In-Charge consistently reminds them of compliance with the Chemical Safety Management Procedure, particularly during morning muster calls.</li> <li>(2) The latest Chemical Handling training was conducted at Pengkalan Bukit Estate on 02/10/2024 by the Assistant Manager In-Charge. During a site visit, the Mandore In-Charge of spraying activities at field P2009 confirmed the availability of SDS in both Bahasa Melayu and English, and demonstrated a clear understanding of the SDS.</li> <li>(3) During a site visit to field P2017B for manuring activities, it was evident that pocket-sized SDS were available with the Mandore In-Charge. Interviews confirmed that carrying pocket-sized SDS to the workplace has become a routine practice for the respective mandore for all chemical-related tasks at the estate.</li> <li>(4) No new contractors have been engaged by the Pagoh POM management since the last audit. However, interviews with existing contractors verified that the POM management consistently emphasizes the importance of SDS. The POM</li> </ol>

	<p>also conducted Chemical Handling Training on 06/09/2024, with training records and evaluations available as evidence.</p> <p>No similar non-compliance issues were identified during the Annual Surveillance Assessment (ASA 2_1). Therefore, the Minor NC raised during the previous Recertification Assessment (RA 2) is closed, affirming the effectiveness of the implemented corrective actions.</p>
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Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	<p><b>OFI Statement:</b> N/A</p> <p><b>Verification / Follow-up actions:</b> N/A</p>

### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2404720-202310-N1	Minor	3.3.2	12/10/2023	Closed on 10/10/2024
2559762-202410-N1	Minor	2.2.2	10/10/2024	"Open"
2559762-202410-N2	Minor	3.4.2	10/10/2024	"Open"
2559762-202410-N3	Minor	7.8.1	10/10/2024	"Open"
2559762-202410-N4	Minor	7.8.3	10/10/2024	"Open"

### 3.4 Stakeholders and Previous Land Owner / User Consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Strategic Operating Unit (SOU 19) – Pagoh 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)
Communities	Kg Sxxxxx, Kg Sxx Mxxxxx, Kg Sxxx Bxxx, Kg Pxxxxxx Sxxx	Face to face
Union	NUPW Representatives	Face to face
Contractor/vendor	Mxxx Enterprise, Nx Sxx Lxxx, Txxx Klinik	Face to face
Internal	Field workers, Foreign workers representative/Social Dialog Representative, gender committee	Face to face
Government Department	School (SK Panjang Sari)	Face to face

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b> NUPW Representatives</p> <p>They informed always give good cooperation and participate any meeting conduct by management to discuss any issues related to workers. The were made aware on the status of latest Collective Agreement (CA) under MAPA/NUPW is still pending and any revision to the latest rates will be based on the latest Minimum Wages Order 2022 @ RM 1500. Latest information is still under court proceeding and the will be keep informed from time to time.</p> <p><b>Audit Team verification and response:</b> Management always given full cooperation to union and support their activities without any interference. Management always give freedom to workers to join any associations.</p>
<b>2</b>	<p><b>Feedbacks:</b> Contractor/vendors</p> <p>During interview sessions with contractors informed they signed contract agreement with SD Guthrie Berhad (<i>formerly known as Sime Darby Plantation Berhad</i>) prior to provide services. The terms and conditions being briefed by estate management prior to signed the contract included the payment term. During the briefing, the contractors agreed VCOBC and Integrity Pledges are signed prior the agreement signed. Payment made promptly after invoicing issued by the contractors and meet payment terms timeline. They informed, estate and mill management monitor their performance by monthly which includes due diligence consist of employment contract, pay slip and other related applicable requirement.</p> <p><b>Audit Team verification and response:</b> Reviewed due diligence document is available together with VCOBC and Vendor Integrity Pledges form signed by both parties. No issues of late payment based on the records verified.</p>
<b>3</b>	<p><b>Feedbacks:</b> Foreign workers representative/Social Dialog Representative</p> <p>They did not pay any recruitment fee for getting job in SD Guthrie Berhad (<i>previously known as Sime Darby Plantation Berhad</i>). They have been briefed on the terms and conditions and working environment in the plantations while they were in home country. Their wages are paid according to Minimum Wage Order 2022 and Collective Agreement. Some of them been selected as workers representative to the Employee Workers Committee (EWC) to discuss workers matter including benefits and wages by voting among themselves without management interfere. Engagement session named</p>

	<p>social dialog held every fortnightly basis used as medium to raise any issues to the management. Foreign workers from each nationality were elected to represent their group. As for those elected as social dialog representative, they will receive allowance of RM 25 per attendance/meeting.</p> <p><b>Audit Team verification and response:</b> No issues on management and continuously communicate with foreign workers during social dialog session on fortnightly basis. Any issue raised will be registered and follow up using social dialog tracker.</p>
4	<p><b>Feedbacks:</b> Field workers (local and foreign workers)</p> <p>For locals, they apply work with estate and mill based on the vacancy information spread through WhatsApp/word of mouth. They have been briefed on the terms and conditions and working environment in the plantation during the interview before been offer with the job they acquired. Their wages are paid according to Minimum Wage Order 2022 and Collective Agreement. They interested to join as member of union, and they not been stop by management. For harvesting gang, most of them prefer the existing/old Division of Earning (DOE) percentage using SD1, SD2 and SD3 depending on the availability of the system in the estate. The current team based (average pay by each member of the group) DOE was not as good as existing/old SD1, SD2 and SD3</p> <p><b>Audit Team verification and response:</b> Verification made with the management the team-based system has been introduced for the new PMI @ <i>Pekerja Migran Indonesia</i>. This team-based system is part of on-the-job training with the purpose to prepare the team to be more productive. For example, at Pagoh Estate previously team-based system was introduced to the new PMI. As at October 2024, no more team-based system all harvesting gang is now under SD2 system.</p>
6	<p><b>Feedbacks:</b> Gender committee</p> <p>They informed that the management treated the female workers equally with male workers includes job opportunity and promotion of work based on work performance and capability. They also informed that no case of discrimination, sexual harassment and domestic violence reported. They are aware on the reporting channel if any case of sexual harassment and domestic violence occur in the estate and mill. Request from new mothers were also entertained by the management as to facilitate in handling their newborn for routine medical check (ante and post-natal) and nutritional support.</p> <p><b>Audit Team verification and response:</b> Reviewed records of meeting minutes for Gender Committee verified the discussion been recorded. Onsite interview confirmed no discrimination and sexual harassment lodged by female workers and minutes.</p>
7	<p><b>Feedbacks:</b> Community (Kg Sxxxxx, Kg Sxx Mxxxxx, Kg Sxxx Bxxx, Kg Pxxxxxx Sxxx), School (SK Panjang Sari)</p> <p>During interview with the school headmaster, he informed that the school has good relationship and good communication with management continuously on focus area includes social, safety and environmental. The representative will continuously request from management to provide manpower for upkeeping at school surrounding and donation for school activities. As for the community, they have highlighted a few concern with regards to flash flood/drain maintenance/road safety/social issue - burglary issue. During the last stakeholder meeting in September 2024, they have not attended the meeting due to other commitment/programme. A process to established and review the SIA management plan in participatory way was not effective. A minor NC under indicator 3.4.2 was raised.</p> <p><b>Audit Team verification and response:</b> The management has responded that the information was not known to them as the said villagers have never informed or meet the management for further discussion. The management has arranged a meeting with the villagers to discuss on the concern raised by them.</p>


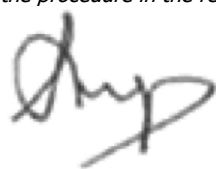
List of land owner / user contacted					
Name	Years of Ownership / Used	Land Area (Ha)	Agreement (Yes / No)	Agreement based on FPIC (Yes/No)	Compliance on the Agreement Terms and Conditions
N/A	N/A	N/A	N/A	N/A	N/A

Previous land owner / user comment	
	<p><b>Feedbacks:</b> Not applicable as the estates have undergone 2nd cycle of replanting.</p> <p><b>Audit Team verification and response:</b>  Based on comprehensive desktop studies, documentation reviews, and records reviews, there is no evidence of land ownership by other users or any customary rights associated with the land currently under oil palm operations. The Unit of Certification is in its third generation of planting, with the current landowner holding the property for over 25 years. A review of the complaint and grievance records during audits confirms that there have been no issues related to land conflict involving this Unit of Certification. Furthermore, interview records from previous and current assessments, including those with local communities, as maintained by BSI MY, indicate that there are no ongoing or historical conflicts related to the land in question.</p> <p>As a precaution, the CB maintains a mechanism to identify and consult any interested parties should any claims or rights be identified in the future. This includes keeping track of all consultations conducted during the certification cycle to ensure comprehensive coverage.</p>

### 3.5 Impartiality and conflict of interest

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

**Formal Signing-off of Assessment Conclusion and Recommendation**

<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 19) – Pagoh Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&amp;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 19) – Pagoh Palm Oil Mill is remain certified.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name: Mohamad Amirul Saifullah</b>	<b>Name: Shylaja Devi Vasudevan Nair</b>
<b>Company Name: BSI Services Malaysia Sdn Bhd</b>	<b>Company Name: SD Guthrie Berhad</b>
<b>Title: Client Manager</b>	<b>Title: Head – Sustainability Compliance Unit, Group Sustainability Department</b>
<b>Signature:</b>  	<b>Signature:</b> <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
<b>Date: 29/10/2024</b>	<b>Date: 03/12/2024</b>



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**Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<b>(C)</b> Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	<p>SOU19 continued to disseminate public information management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans. All operating units have individual documents and records to demonstrate compliance to this indicator. Other publicly available documents such as policies, company statement and annual reports were made available in the website; <a href="https://www.sdguthrie.com/">https://www.sdguthrie.com/</a>.</p> <p>For CSR related activities, information relating to social program on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes.            The website address: <a href="http://www.yayasansimedarby.com/">http://www.yayasansimedarby.com/</a>.</p> <p>Figures of gender distribution within all workers categorized by management, administrative staff and workers (both permanent casual workers, piece rate workers) were made available at estate and mill office with record titled 'SEMUA – EMPLOYEE MASTER LISTING'.</p>	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	Information available in appropriate languages and accessible to relevant stakeholders through sample meeting latest conducted at each specific	Complied



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	- Minor compliance -	operating unit. For SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC), stakeholder meeting was carried out on 12/9/2024 at Pagoh Estate. Stakeholder bulletin (complaint and grievance procedure, fire prevention and RSPO requirements) and social dialogue reinforcement were discussed in the meeting with internal stakeholders. Information (in bi-lingual English and Malay) can be seen in the strategic area within estate and mill compound	
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	<p>Requests for information specified in the RSPO Principles &amp; Criteria (P&amp;C) from any stakeholders can be documented in several ways, such as through a Communication Logbook and by filing correspondence documents (e.g., email printouts and letters). The engagement process with stakeholders via email or letter includes a feedback form for reporting or highlighting any issues to management.</p> <p>Requests made by workers are primarily related to house repairs and official internal requests by the Region/Head Office. These records are maintained in the Complaint/Grievance Form and/or in meeting minutes. Management has responded promptly, with evidence of complaints or requests being addressed. For example:</p> <ul style="list-style-type: none"> <li>• The Malaysian Palm Oil Board (MPOB) requested the latest information on the implementation of mechanization at the respective estate management. The estate management responded in a timely manner, with communication conducted via email.</li> <li>• The Department of Environment (DOE) requested the latest information from Pagoh Palm Oil Mill (POM) management related to environmental matters. Pagoh POM responded with the requested information via email.</li> </ul>	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	The Standard Operation Manual dated 01/11/2008 outlines the Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). Additionally, the Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on Handling Social Issues) dated 01/11/2008	Complied

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	- Critical (Major) compliance -	<p>details the process for managing communication regarding social issues. This procedure is applicable to all employees, stakeholders, and the public. The procedure was communicated to all stakeholders during meetings and consultations by a nominated representative and was also displayed on the main notice boards. It was specifically briefed to stakeholders during the RSPO stakeholder meeting, with the latest meeting held on 12/09/2024. The procedure was also explained to workers during morning muster calls and training sessions, such as at Pagoh Mill on 07/06/2024, Lanadron Estate on 29/05/2024, Pengkalan Bukit Estate on 22/07/2024, and Pagoh Estate on 11/07/2024.</p> <p>During the audit, appointment letters for nominated representatives responsible for handling communication issues in each operating unit were reviewed. These representatives play a crucial role in effectively implementing the communication procedures.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Both the estate and the mill continued to maintain the stakeholder's information (address, contact number, nominated representatives) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, local communities, CPO/PK customers, etc. The list of stakeholders has been established by the mill. The list was updated on for 2024 comprises of various parties, neighbouring communities and Government Agencies. The subjects discussed during the meeting held on 12/9/2024 with the presence including stakeholders among others discussed on the following subjects;</p> <ul style="list-style-type: none"> <li>a) Company Policies and SOP</li> <li>b) Issues relating to neighborhood and concerns</li> <li>c) Appointment of social liaison officer for each OU</li> <li>d) Explanation of 11 ILO indicators</li> </ul> <p>There is no major course of concern of issues highlighted during the meeting.</p>	Complied

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<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English.</p> <p>The latest Group Sustainability &amp; Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies &amp; Authorities (GPA) and the Code of Business Conduct (COBC) signed by Group Managing Director on 02/12/2019. SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) has imposed the implementation of the COBC to all its contractors and vendors by signing the Vendors Integrity Pledge document. Copies of the signed pledges were kept by all the operating units and made available for verification. Besides, policies were briefed to stakeholders during the stakeholder meeting. COBC briefing for contractor/vendor was done during contract/VIP signing i.e. Kxx Sxxx Lxx on June 2023. Kxx Sxxx Lxx Transport Sdn Bhd on 11/09/2024.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) has established the Vendor Integrity Pledge (VIP) and Vender COBC as a due diligence for external parties engaged by Operating Units. Sighted sampled as below:</p> <ul style="list-style-type: none"> <li>i. Kxx Sxxx Lxx Transport Sdn Bhd (578359-W)</li> <li>ii. Mxxx Enterprise (MA 0245462-P)</li> <li>iii. Xx Uxxxxxxx Fxxxxxxx Sdn Bhd (957938-M)</li> </ul> <p>At the operating unit level, the system to monitor is mainly by regular checking of the contractors' legal compliance and employees' welfare by the management. Apart from that, annual internal audit is also one of the</p>	Complied

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		methods to ensure whether the management is monitoring the compliance and implementation of the policy of the counterparties.	
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<p>Based on the desktop study, records reviewed, site visit observations, and interviews with relevant personnel, it has been verified that all operating units within SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) comply with applicable legal requirements. There were no reported legal violations involving any of the UoC's operating units, and no warning notices were issued by Malaysian government authorities to any of these units.</p> <p>Furthermore, each operating unit of the UoC has obtained and renewed the necessary licenses and permits as required by law. Some of the sampled licenses and permits viewed in the mill and estates include:</p> <p><u>Pagoh Palm Oil Mill:</u></p> <ul style="list-style-type: none"> <li>• MPOB License under the Malaysian Palm Oil Board (Licensing) Regulations 2005 of the Malaysian Palm Oil Board Act 1998: License No. 565809104000, and this license is valid until 31/10/2025.</li> <li>• License for Private Installation under the Section 21 of the Electricity Supply Act 1990: License No. 004944/2023 for installation no. ST(SJB)P/S/JHR/01967, valid until 21/07/2025.</li> <li>• Department of Environment License No. 006387 under Section 11 of the Environmental Quality Act 1974, which is valid until 30/06/2025.</li> <li>• License for Diverting or Abstracting River Water No. 08/A/Muar/020 under the Section 7 of the Water Enactment (Johor) 1921, which is valid until 31/12/2024.</li> <li>• Application for Overtime Limit under Section 60A(4)(a) of the Employment Act 1955 approved on 27/03/2017 (Ref. Letter No. BHG. PU/9/134 JLD 9 (11)).</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Certificate of Fitness under the Factories and Machinery (Notification, Certificate of Fitness and Inspection) Regulations 1970 Regulation 10(2) of the Factories and Machinery Act 1967, the sampled certificates are as follows: <ul style="list-style-type: none"> <li>▪ PMT-JH/23 224515, valid until 07/02/2025 for Oblique Steriliser No. JH PMT 95848</li> <li>▪ PMT-JH/23 225196, valid until 15/02/2025 for Air/Vacuum/N2 Tank 310 Litres X -1/10 Bar OD488 X 1524SL No. JH PMT 92969</li> <li>▪ PMT-JH/23 225197, valid until 15/02/2025 for Electric Chain Hoist no. JH PMA 12649</li> <li>▪ PMT-JH/23 225199, valid until 15/02/2025 for Air Compressor No. JH PMT 16778</li> <li>▪ PMT-JH/23 225200, valid until 15/02/2025 for Air Receiver No. JH PMT 20167</li> <li>▪ PMT-JH/23 225201, valid until 15/02/2025 for Steam Receiver No. JH PMT 20185</li> <li>▪ PMT-JH/23 225205, valid until 15/02/2025 for Inclined Steriliser No. JH PMT 20180</li> <li>▪ PMT-JH/23 225207, valid until 15/02/2025 for Water Tube Steam Boiler No. JH PMD 1426</li> </ul> </li> <li>• Among the sampled certificates of competent persons are as follows: <ul style="list-style-type: none"> <li>▪ Certified Environmental Professional in Scheduled Waste Management (CePSWaM): Serial No. CePSWaM/2217801</li> <li>▪ Certified Environmental Professional in the Treatment of Palm Oil Mill Effluent (CePPOME): Serial No. CePPOME/00005</li> <li>▪ Certificate of Competency under Regulation 5(2) of the Factories and Machinery Act 1967: Engineer (Steam) Grade 1 (Certificate No. JKKP/2024/JS01/614) dated 27/03/2024</li> </ul> </li> </ul>	
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		<ul style="list-style-type: none"> <li>▪ Certificate of Competency under Regulation 5(2) of the Factories and Machinery Act 1967: Engineer (Steam) Grade 2 (Certificate No. JKKP/2022/JS02/217) dated 03/11/2022</li> <li>▪ Authorised Entrant and Standby Person for Confined Space (AESP): Serial No. NW-SRO-AE-8129-U, valid until 11/10/2025</li> <li>▪ Authorised Gas Tester &amp; Entry Supervisor (AGTES): Serial No. AGT379246-24, valid until 20/12/2025.</li> </ul> <p><u>Lanadron Estate</u></p> <ul style="list-style-type: none"> <li>• MPOB License under the Malaysian Palm Oil Board (Licensing) Regulations 2005 of the Malaysian Palm Oil Board Act 1998: License No. 522273002000, which is valid until 31/07/2025.</li> <li>• Scheduled Controlled Goods Permit under Regulation 18 – Control of Supplies Regulations (Amendment) 2021: Permit Serial No. PBKB/2024/P/J-000150 for 14,000 liters of non-subsidized diesel, which is valid until 17/06/2027.</li> <li>• License for Diverting or Abstracting River Water No. 07/A/Muar/071 under the Section 7 of the Water Enactment (Johor) 1921, which is valid until 31/12/2024.</li> <li>• Approval of wage deduction application under Section 24 of the Employment Act 1955 (Ref. No. TK (NJ) U-25) dated 19/12/2017.</li> <li>• Certificate of Fitness under the Factories and Machinery (Notification, Certificate of Fitness and Inspection) Regulations 1970 Regulation 10(2) of the Factories and Machinery Act 1967, the sampled certificates are as follows: <ul style="list-style-type: none"> <li>▪ PMT-JH/24 255771, valid until 28/11/2025 for Air Receiver No. MK-PMT-1873</li> <li>▪ PMT-JH/24 255772, valid until 28/11/2025 for Air Receiver No. MK-PMT-1881</li> </ul> </li> </ul>	
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		<p><u>Pengkalan Bukit Estate</u></p> <ul style="list-style-type: none"> <li>• MPOB License under the Malaysian Palm Oil Board (Licensing) Regulations 2005 of the Malaysian Palm Oil Board Act 1998: License No. 518941002000, which is valid until 28/02/2025.</li> <li>• MPOB License under the Malaysian Palm Oil Board (Licensing) Regulations 2005 of the Malaysian Palm Oil Board Act 1998: License No. 620445011000, for activities of producing, selling, transferring, and storing palm oil seedlings from palm oil seeds, valid until 31/08/2025.</li> <li>• Code of Good Nursery Practice for Oil Palm Nurseries: Certificate No. 2023130, valid until 12/07/2026</li> <li>• Class License No. LK/3/22/01324 under the Fifth Schedule (Sub-regulation No. 23(1)) of the Water Services Industry (Licensing) Regulations 2007 of the Water Services Industry Act 2006, which is valid until 28/07/2025.</li> <li>• License for Diverting or Abstracting River Water No. 07/A/Muar/119 under the Section 7 of the Water Enactment (Johor) 1921, which is valid until 31/12/2024 – for C Division.</li> <li>• License for Diverting or Abstracting River Water No. 07/B/Muar/120 under the Section 7 of the Water Enactment (Johor) 1921, which is valid until 31/12/2024 – for Paya Redan Division.</li> <li>• License for Diverting or Abstracting River Water No. 07/A/Muar/121 under the Section 7 of the Water Enactment (Johor) 1921, which is valid until 31/12/2024 – Pagoh Division.</li> <li>• Scheduled Controlled Goods Permit under Regulation 18 – Control of Supplies Regulations (Amendment) 2021: Permit Serial No. PBKB/2024/P/J-000088 for 8,000 liters of non-subsidized diesel, which is valid until 13/09/2027.</li> <li>• Scheduled Controlled Goods Permit under Regulation 18 – Control of Supplies Regulations (Amendment) 2021: Permit Serial No.</li> </ul>	
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		<p>PBKB/2024/P/J-000090 for 9,000 liters of non-subsidized diesel, which is valid until 13/09/2027.</p> <ul style="list-style-type: none"> <li>• Certificate of Fitness under the Factories and Machinery (Notification, Certificate of Fitness and Inspection) Regulations 1970 Regulation 10(2) of the Factories and Machinery Act 1967, the sampled certificates are as follows: <ul style="list-style-type: none"> <li>• PMT-JH/23 223964, valid until 25/01/2025 for Air Compressor Tank No. MK PMT 1884</li> <li>• PMT-JH/23 223965, valid until 25/01/2025 for Air Compressor Tank No. MK PMT 1887</li> </ul> </li> </ul> <p><u>Pagoh Estate:</u></p> <ul style="list-style-type: none"> <li>• MPOB License under the Malaysian Palm Oil Board (Licensing) Regulations 2005 of the Malaysian Palm Oil Board Act 1998: License No. 508589902000, which is valid until 30/04/2025 – the license indicated that the license is for the area of 2,046.70 hectare.</li> <li>• MPOB License under the Malaysian Palm Oil Board (Licensing) Regulations 2005 of the Malaysian Palm Oil Board Act 1998: License No. 597369011000, for activities of producing, selling, transferring, and storing palm oil seedlings from palm oil seeds, valid until 30/04/2025.</li> <li>• Code of Good Nursery Practice for Oil Palm Nurseries: Certificate No. 2024032, valid until 09/01/2027</li> <li>• Certificate of Fitness No. PMT-JH/24 240446 under the Factories and Machinery (Notification, Certificate of Fitness and Inspection) Regulations 1970 Regulation 10(2) of the Factories and Machinery Act 1967 for Air Compressor No. MK PMT 722, which is valid until 17/06/2025.</li> </ul> <p>These licenses, permits, and certifications indicate that the UoC has fulfilled the required standards and regulations set by governing authorities. The</p>	
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		proper maintenance of these documents demonstrates the UoC's commitment to complying with legal obligations.	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The respective operating units of the Unit of Certification (UoC) have maintained compliance with legal requirements through established and implemented documented procedures, as outlined in their respective Quality Management Systems (Estate Quality Management System and Mill Quality Management System), Level 2: Standard Operating Manual, specifically Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008. This mechanism ensures adherence to legal and other requirements and is documented in the EQMS and MQMS, which are distributed to all operating units of the UoC. The GSD Department and respective operating units of the UoC are responsible for identifying, managing, updating, and tracking legal requirements, as well as monitoring legal compliance status.</p> <p>Furthermore, all operating units of the UoC maintain a Legal &amp; Other Requirements Register (LORR) that covers all necessary regulatory requirements. Since the last audit, the LORR has been updated on 23/09/2024 by Group Sustainability Department to include the newly enacted Environmental Quality (Amendment) Act 2024, Income Tax (Amendment) Act 2024, Personal Data Protection (Amendment) Act 2024, Employees' Social Security (Amendment) Act 2024, and Employment Insurance System (amendment) Act 2024.</p> <p>A robust tracking system is in place to identify changes in relevant regulations. This system leverages resources from the head office, website information, and communications from the Group Head Office. Site verification, including interviews with office personnel and records review, confirms that this system is effectively implemented and appropriate for the operations.</p> <p>Each operating unit of the UoC has designated specific individuals responsible for overseeing compliance, tracking, and updating changes in</p>	Complied

		regulatory requirements. Sighted appointment letter for respective person in charge (PIC) of Legal & Other Requirement Register (LORR) for respective operating units of the UoC. Referring to appointment letter issued by the respective operating unit managers in January 2024, among the functions which both of PIC are required to perform is to monitor any changes on the Legal & Other Requirements Register (LORR) and update as and when necessary.	
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 -	<p>The legal boundaries of the estates are clearly demarcated and visibly maintained. Additional wooden or metal pegs have been installed to enhance the visibility of the boundaries. Other boundary markers include roads, drains, and rivers, which may not have visible pegs. Onsite verification confirmed that there has been no planting beyond the legally demarcated boundary areas of the mill and estates.</p> <p>During the site visit at Lanadron Estate, a boundary stone labeled as BS 2 by the management was observed. This stone is located in Block P18A-1, marking the boundary between the estate and external parties. The GPS coordinates of the boundary stone are 2.192749 N; 102.740165 E. A site visit at Pagoh Estate, specifically at fields P2023 B and P2019 A, found that the borders were properly demarcated with trenches, and boundary stones were present at each point.</p> <p>A boundary map showing the location of boundary markers is available. Locations of several boundary stones and markers were revisited and verified to be within the perimeters of the estate land titled boundaries. It was verified that there has been no change to the stated land titles and designated use for the cultivation of agricultural crops of economic value.</p>	Complied
<b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	A list of contracted parties maintained by all operating units within SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) in their respective List of Stakeholders Information FY 2024 which consists of stakeholders among Local Community Heads, Neighbours, Local Authorities, Vendors	Complied

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		(Contractors & Suppliers) and Outside Crop Purchase (OCP) Suppliers (Mill only).	
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>Contracts contain specific clauses on meeting applicable legal requirements available in the Vendor Integrity Pledge records for sampled contractors/vendor/buyer i.e.</p> <p>i) Mxxx Enterprise (MA0245462-P), scope of work: domestic waste collection valid until 31/12/2024.</p> <p>ii) Xx Uxxxxxxx Fxxxxxxx Sdn Bhd (957938-M) scope of work :FFB transportation services for SD Guthrie Berhad (formerly known as Sime Darby Plantation Sdn Bhd) valid until 31/12/2024.</p> <p>Evidence of due diligence process carried out via yearly vendor evaluation process under Contractor Key Performance Indicator (KPI) evaluation. 5 criteria evaluated as per the following:</p> <p>KPI 1: Completion of work</p> <p>KPI 2: Accident rate</p> <p>KPI 3: Non-compliance to ESH</p> <p>KPI 4: Non-compliance to Security Procedure</p> <p>KPI 5: Complaints by estates and mill</p> <p>Evidence of legal due diligence of contracted third parties were not effectively demonstrated for the following samples:</p> <p><u>Lanadron Estate</u></p> <p>Salary payment records for workers under Kim Soon Lee Transport Sdn Bhd was paid in cash as per the following details:</p> <p>August 2024 salary (nett), local worker</p> <p>i) Mxxx Fxxxx Bin Bxxxx: RM 1,138.83, payment voucher dated 7/09/2024</p>	Non-compliance

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		<p>ii) Mxxxxxxx Hxxxxxx Bin Sxxxx: RM 1,253,51, payment voucher dated 7/09/2024</p> <p>iii) Mxxxxxxx Rxxxxx Bin Sxxxxxxxx: RM 1,238,83, payment voucher dated 7/09/2024</p> <p><u>Pengkalan Bukit Estate</u></p> <p>July - September 2024 salary (nett)</p> <p>Salary for one (1) foreign worker [ Nxxxxx, C9005915] under MASSK Enterprise was paid in cash with evidence of payment voucher. Further verification made with the contractor has confirmed that the worker is still in progress of opening the bank account.</p> <p>Process to ensure compliance to legal is based on monthly due diligence records (Contractor Key Performance Indicator (KPI) Evaluation which only focus on ESH legal and security procedures, thus the said issue was not thoroughly evaluated. The current practice was not in line with Employment Act 1955 (amendment 2022) under section 25(1) - Wages to be paid through financial institution.</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>The contract documents and Vendor Integrity Pledge (VIP) records sighted in the indicator 2.2.2 above also contain clauses disallowing child, forced and trafficked labour. No young workers are employed by contractors and vendors.</p>	Complied
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins</li> </ul>	<p>Within the certification scope, Pagoh Palm Oil Mill is supported by three (3) primary estates that provide Fresh Fruit Bunches (FFB), which are Pagoh Estate, Pengkalan Bukit Estate, and Lanadron Estate. Additionally, from October 2023 to September 2024, the mill also received and processed</p>	Complied

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	<ul style="list-style-type: none"> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>RSPO-certified FFBs from Kempas Estate, Sepang Estate, Welch Estate, Tangkah Estate, and Serkam Estate.</p> <ul style="list-style-type: none"> <li>• Sepang Estate certified under Strategic Operating Unit (SOU 8) – East Palm Oil Mill (Certificate No. RSPO 543543, valid until 18/05/2025)</li> <li>• Kempas Estate, Tangkah Estate, and Serkam Estate certified under Strategic Operating Unit (SOU 17) – Kempas Palm Oil Mill (Certificate No. RSPO-PC 00101, valid until 19/05/2025)</li> <li>• Welch Estate certified under Strategic Operating Unit (SOU 18) – Diamond Jubilee Palm Oil Mill (Certificate No. RSPO 591224, valid until 04/10/2026)</li> </ul> <p>Specifically, there are 8 direct non-certified OCPs (Outside Crop Producer), along with estates supplying FFB within the certification scope (Pagoh Estate, Pengkalan Bukit Estate, and Lanadron Estate) as listed below:</p> <ul style="list-style-type: none"> <li>• Lxx Axxx Pxxxx &amp; Pxxxx</li> <li>• Bxxxx Exxxxx</li> <li>• Exxxxxxxx Pxxxxx</li> <li>• Exxxxx Exxxxx</li> <li>• Gxx Exxxxx</li> <li>• Jxxxx Lxxxx</li> <li>• Kxxxxxx Mxxxx</li> <li>• Pxxxxxxxx Pxxxxxx</li> </ul> <p>Sampled the GPS Coordinates and MPOB License of the 8 direct non-certified OCPs as below:</p> <table border="1"> <thead> <tr> <th rowspan="2">OCP</th><th colspan="2">GPS Coordinate</th><th rowspan="2">MPOB License</th></tr> <tr> <th>Latitude</th><th>Longitude</th></tr> </thead> <tbody> <tr> <td></td><td>2.404408 N</td><td>102.207929 E</td><td>620883002000</td></tr> </tbody> </table>	OCP	GPS Coordinate		MPOB License	Latitude	Longitude		2.404408 N	102.207929 E	620883002000	
OCP	GPS Coordinate			MPOB License									
	Latitude	Longitude											
	2.404408 N	102.207929 E	620883002000										

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		<table> <tr> <td>Lxx Axxx Pxxxx &amp; Pxxxx</td><td>2.411941 N</td><td>102.242032 E</td><td></td></tr> <tr> <td>Exxxxxxx Pxxxxx</td><td>2.457892 N</td><td>102.260654 E</td><td>547581002000</td></tr> <tr> <td>Kxxxxxx Mxxxx</td><td>2.132137 N</td><td>102.664332 E</td><td>525486102000</td></tr> </table> <p>Based on the documentation review and interview with the key personnel at the Pagoh Palm Oil Mill, it is verified that the palm oil mill management has systematically gathered evidence for each of its Outside Crop Producers (OCPs), including GPS coordinates, copy of land titles, copy of MSPO Certificate, and copy of valid MPOB license.</p>	Lxx Axxx Pxxxx & Pxxxx	2.411941 N	102.242032 E		Exxxxxxx Pxxxxx	2.457892 N	102.260654 E	547581002000	Kxxxxxx Mxxxx	2.132137 N	102.664332 E	525486102000			
Lxx Axxx Pxxxx & Pxxxx	2.411941 N	102.242032 E															
Exxxxxxx Pxxxxx	2.457892 N	102.260654 E	547581002000														
Kxxxxxx Mxxxx	2.132137 N	102.664332 E	525486102000														
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>There are 4 indirect non-certified OCPs (Outside Crop Producer), along with estates supplying FFB within the certification scope (Pagoh Estate, Pengkalan Bukit Estate, and Lanadron Estate) as listed below:</p> <ul style="list-style-type: none"> <li>• Bx Rxxxxx &amp; Pxx</li> <li>• Exx Hxxx Lxxxx</li> <li>• Kxxxxx Sxxxx Txx</li> <li>• Sxx Cxxx Jxx</li> </ul> <p>Sampled the GPS Coordinates and MPOB License of the 4 indirect non-certified OCPs as below:</p> <table> <tr> <th rowspan="2">OCP</th><th colspan="2">GPS Coordinate</th><th rowspan="2">MPOB License</th></tr> <tr> <th>Latitude</th><th>Longitude</th></tr> <tr> <td>Exx Hxxx Lxxxx</td><td>2.588846 N</td><td>102.767828 E</td><td>505907315000</td></tr> <tr> <td>Sxx Cxxx Jxx</td><td>2.093586 N</td><td>102.621295 E</td><td>505421715000</td></tr> </table>	OCP	GPS Coordinate		MPOB License	Latitude	Longitude	Exx Hxxx Lxxxx	2.588846 N	102.767828 E	505907315000	Sxx Cxxx Jxx	2.093586 N	102.621295 E	505421715000	Complied
OCP	GPS Coordinate			MPOB License													
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		<p>The Pagoh Palm Oil Mill is currently in the process of collecting information related to several indirectly sourced Fresh Fruit Bunches (FFB), as outlined in Indicators 2.3.1.</p> <p>Referring to the email from the RSPO Secretariat to SD Guthrie Berhad management, which clarified that the RSPO Principles and Criteria (P&amp;C) 2023 were not tabled for endorsement during the General Assembly (GA20), the matter of extending the Interim Measure has been raised with the Standard Standing Committee (SSC). As of 29 Nov 2023, the RSPO Secretariat has confirmed the extension of the fulfilment requirement for Indicator 2.3.2 until further announcement from the RSPO Secretariat.</p> <p>Prior to this audit conducted, the PIC of the UoC from the Group Sustainability Department has submitted data and plan that consists of:</p> <ul style="list-style-type: none"> <li>• the implementation progress and challenges report with evidence the status of compliance detailing the total number of indirect FFB suppliers with the number of indirect FFB suppliers whose evidence (as per Indicator 2.3.1) obtained and those yet to be obtained.</li> <li>• A stepwise plan that outlines the actions and projected timeline towards complete fulfilment of the Indicator 2.3.2 requirement.</li> </ul> <p>Since the deadline for full implementation has been extended until further announcement from the RSPO Secretariat, the data and plan have been revised accordingly by the Group Sustainability Department (GSD) of SD Guthrie Berhad. The data and plan were evaluated during the audit and verified to contain the progress in meeting the requirement of Indicator 2.3.2 by the SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) management, particularly for SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC).</p>	
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>			
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.			

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3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>A business plan for 5 years has been documented. SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Annual business plan in the form of annual budget and the projection for 5 years (2024-2028) were prepared as guidance for future planning.</p> <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. In the 5 years business plan include items as follows:</p> <p>a) Palm oil mill</p> <ul style="list-style-type: none"> <li>i. Mill intake – FFB input</li> <li>ii. Production of CPO</li> <li>iii. Production of PK</li> <li>iv. Total Palm Oil Extraction</li> <li>v. Total Palm Kernel Extraction</li> <li>vi. Mill cost</li> </ul> <p>b) Oil Palm Estate</p> <ul style="list-style-type: none"> <li>i. Total crop projection and yield potential</li> <li>ii. Activity direct cost <ul style="list-style-type: none"> <li>a. Mature upkeep</li> <li>b. Manuring</li> <li>c. Harvesting and collection</li> <li>d. Transportation</li> <li>e. Nursery</li> </ul> </li> <li>iii. Estate administration <ul style="list-style-type: none"> <li>a. Admin Cost</li> </ul> </li> <li>iv. Labour overhead</li> </ul>	Complied
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		<div>v. Road and bridges</div> <div>vi. Cost of production.</div> <div>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2028) and well documented upon request.</div>																															
3.1.2	<div>An annual replanting programme projected for a minimum of five years with yearly review, is available.</div> <div>- Minor compliance -</div>	<div>An annual replanting programme for incoming 5 years has been documented. Refer SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC)Replanting programme 2024 - 2028. Replanting planned for the palm older than 25 years, non-performance field (yield) and Ganoderma infected palm.</div> <div>Long range replanting program for SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) for the next 5 years as follows:</div> <table><tr><td></td><td colspan="5">Replanting (Ha)</td></tr><tr><td>Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Lanadron</td><td>0.00</td><td>114.69</td><td>100.75</td><td>74.83</td><td>0.00</td></tr><tr><td>Pengkalan Bukit</td><td>92.53</td><td>77.21</td><td>223.42</td><td>161.54</td><td>133.38</td></tr><tr><td>Pagoh</td><td>78.76</td><td>169.80</td><td>0.00</td><td>0.00</td><td>101.68</td></tr></table>		Replanting (Ha)					Estate	2024	2025	2026	2027	2028	Lanadron	0.00	114.69	100.75	74.83	0.00	Pengkalan Bukit	92.53	77.21	223.42	161.54	133.38	Pagoh	78.76	169.80	0.00	0.00	101.68	Complied
	Replanting (Ha)																																
Estate	2024	2025	2026	2027	2028																												
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Pagoh	78.76	169.80	0.00	0.00	101.68																												
3.1.3	<div>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</div> <div>- Minor compliance -</div>	<div>Management has established the management review guidelines which was communicated to all operating unit on 23/02/2024. Management review was conducted on annually basis by Operating Unit. Latest management review meeting was conducted at Pagoh POM on 02/09/2024, at Lanadron Estate on 13/09/2024, at Pengkalan Bukit Estate on 08/08/2024, and at Pagoh Estate on 20/08/2024.</div> <div>The minutes of meeting were verified. The topic discussed in the meeting were:</div> <div>1. Introduction</div> <div>2. Matters Arising</div>	Complied																														

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		3. Review on status / issue of input and output 4. Operation performance 5. Internal Audit results and status 6. Management Plan review, monitoring and measurement results 7. Stakeholders and consumer feedbacks, complaints and grievances 8. Adequacy of resources 9. Recommendation for improvement 10. Other matters 11. Conclusion	
<b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.			
3.2.1	<b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	Continuous Improvement Plan has been established on 27/09/2024 at Lanadron Estate and on 30/09/2024 at Pagoh Estate: The sample of the continuous improvement plan is as following: 1. Request of replacing 15 units of land surf in budget FY2025 2. Harvesting path repair for enhancing in field collection 3. Improving irrigation system desilting in field drain 4. Enforcement of Oil Palm Pal for housing repair 5. Promoting the esime+ culture by briefing , share and paste the QR Code at strategic area.  Pengkalan Bukit Estate has established the Continuous Improvement Plan dated 01/10/2024, which outlines the improvement on the operational in field, social and safety, Sample of the plans are as following: 1. Application of rat bait using machines (MERBA)	Complied

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		<ol style="list-style-type: none"> <li>2. Mechanised manuring using MTFA machines</li> <li>3. Mechanised circle and strip spraying using ST GEO, ASP and MB reels sprayer</li> <li>4. Conversion of domestic water at C division and Pagoh division from own water treatment to SAJ treatment water.</li> </ol> <p>Pagoh Palm Oil Mill Continuous Improvement Plan which was established on 01/10/2024 outlines the following:</p> <ol style="list-style-type: none"> <li>1. HACCP Certification for food safety system</li> <li>2. Reactivation of 5S system to implement continuous improvement culture at mill</li> <li>3. Reactivation of FFB Splitter to ensure better steam penetration</li> <li>4. Transferring Calcium Carbonate using forklift to reduce safety issues.</li> </ol>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b></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 metrics template submitted was verified its data to be consistent and reflective of raw data sources for all estate in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC)</p>	Complied
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.	Respective operating unit of SOU 19 – Pagoh Palm Oil Mill Unit of Certification continued to use and implement SOP for each of the	Complied

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	<p>- Critical (Major) compliance -</p>	<p>processes/operations. Brief version of the SOP was displayed at the appropriate locations. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, and others, had followed the established SOP.</p> <ul style="list-style-type: none"> <li>• Agriculture Reference Manual (ARM) dated 01/12/2023,</li> <li>• Estate Quality Management System (EQMS) Manual dated 01/10/2023,</li> <li>• Generic Safety Procedure dated 21/08/2023,</li> <li>• Sustainable Plantation Management System Manual (SPMS),</li> <li>• Riparian Reserves Management, by Conservation &amp; Biodiversity Unit (CBU), Group Sustainability, June 2021</li> <li>• Health, Safety &amp; Environment Management System HSEMS Manual dated 09/03/2021,</li> <li>• Pictorial Safety Standards, and Security Guidelines (PSS).</li> <li>• Plantations / Mill Quality Management System (PQMS / MQMS) standard operating manual</li> <li>• Laboratory Process Control Manual</li> <li>• Security Guidelines</li> </ul> <p>The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security.</p> <p>For all 3 estates, in addition to the EQMS, contents of the Agriculture Reference Manual were disseminated to the workers through morning roll call and training. The Manual is also kept in the administration office where everyone can refer to. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety, health and the environment.</p>	
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		<p>Palm Oil Mill holds two SOPs: Standard Operating Procedure for palm oil mills Version 2 dated 1st January 2019. and Mill Quality Management System version 1 dated 1/11/2008 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, SD Guthrie Berhad has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. SD Guthrie Berhad continuously updated the SOP established. Among the updated SOP as follows:</p> <ol style="list-style-type: none"> <li>(1) UM HSE Management System Manual, UM/HSE/MS/01</li> <li>(2) First Aid in Workplace Procedure, UM/HSE/OCP/01</li> <li>(3) Safety Harvesting Procedure, UM/HSE/OCP/02</li> <li>(4) Personal Protective Equipment Procedure, UM/HSE/OCP/03</li> <li>(5) Chemical Safety Management Procedure, UM/HSE/OCP/04</li> <li>(6) Permit to Work (PTW) Procedure, UM/HSE/OCP/05</li> <li>(7) OSH Risk Management Procedure, UM/HSE/SE/01</li> </ol>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Respective estates and the mill had an established mechanism to perform checking to ensure consistent implementation of procedures.</p> <p><u>Pagoh Palm Oil Mill</u></p> <ul style="list-style-type: none"> <li>• Daily Production Report (sighted 30/09/3034) providing details as follows: <ul style="list-style-type: none"> <li>▪ FFB received / processed / balance</li> <li>▪ FFB certified non-certified quantity</li> <li>▪ Produce production / despatch / balance</li> <li>▪ Storage capacity/ status / laboratory results</li> </ul> </li> <li>• Unscheduled General Manager visit min twice monthly</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Internal audit has carried respectively to inspect compliance on RSPO P&amp;C Standard requirement. Results from the assessment were sighted and verified. The results were presented in the Management Review held respectively by all units in the UoC were satisfactory and UoC has established the proper and maintain the record of request documentation.</li> <li>• Regulatory Body Visit i.e. <ul style="list-style-type: none"> <li>▪ DOSH machinery inspection</li> <li>▪ DOE visit for enforcement visit</li> <li>▪ External 3rd party audit</li> </ul> </li> </ul> <p><u>Estates Operations</u></p> <p>The monitoring of the SOP implementation is made by all levels of the supervisory personnel with records maintained and checked. Among others the records maintained are:</p> <ul style="list-style-type: none"> <li>• Daily production/work records for the core activities at the estates</li> <li>• field cost book / chemical consumption record</li> <li>• mature/immature field work program</li> <li>• fertilizer application,</li> <li>• herbicide spraying, / rat baiting,</li> <li>• Harvesting and collection of FFB.</li> </ul> <p>Internal audit by the GSD (Group Sustainability Department) scheduled once a year for each unit. The exercise is to inspect and monitor compliance on MSPO/RSPO standard requirement. Results from assessment of which are tabled and discussed during the Management Review. Internal audit by the GSD was conducted by 4 internal auditors with details as below:</p>	
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		<ul style="list-style-type: none"> <li>• Pagoh Mill conducted on 07/08/2024.</li> <li>• Pagoh Estate conducted on 09/08/2024</li> <li>• Pengkalan Bukit Estate conducted on 08/08/2024</li> <li>• Lanadron Estate conducted on 06/08/2024</li> </ul> <p>During the audit, random interviews with the estate workers revealed that they understood the requirements stated in the SOP. For example, it was observed that harvesting standards and pesticides usage had been properly understood by the estate harvesters and sprayers respectively.</p> <p>The mechanisms as established have been implemented. This is verified via the records maintained in all units daily, monthly and annually. Respective operating unit of the UoC are monitored to ensure compliance against the SOP standard and factors relating to RSPO P&amp;C.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The implementation of SOP is monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance. The estates among others maintained the following records.</p> <ul style="list-style-type: none"> <li>• work program / Field cost books</li> <li>• bin cards, Harvesting Intervals,</li> <li>• Monthly Estate Report and Account,</li> <li>• Monthly Operations, monthly rainfall,</li> <li>• pest and diseases monthly return,</li> <li>• agrochemical monthly consumption</li> <li>• harvesting details i.e. daily inspection report - yield improvement program,</li> <li>• summary of machinery running hours</li> <li>• harvesting records detailing the number of bunches harvested</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• quantity of loose fruit collected by each harvesters.</li> <li>• Monthly FFB production, etc.</li> </ul> <p>Similarly for the mill the monitoring records maintained among others were related to;</p> <ul style="list-style-type: none"> <li>• monitoring of effluent / black smoke</li> <li>• Processing &amp; produce parameters</li> <li>• Dispatches / scheduled wastes etc.</li> <li>• monitoring consistent implementation of procedures through internal audit.</li> <li>• daily shift report for the process performance.</li> <li>• There was a flow chart showing method for monitoring compliance of requirements including legal requirements.</li> <li>• Internal audits are performed once a year minimum.</li> </ul> <p>Activities performed by contractors are being monitored via the following among others</p> <ul style="list-style-type: none"> <li>• to obtain work permit for confined spaces or work at height in the Mill</li> <li>• evidence of competency for specialized work/job</li> <li>• The mill supervisors and engineers will be onsite to monitor the work.</li> <li>• The estates monitor to ensure that no contractors bring along their family members to work in the field.</li> <li>• The estates ensure that the contractors are providing PPE, suitable working equipment and machinery.</li> </ul> <p>All the above records were kept for a minimum period of 12 months. In addition, the management adopted the following check and balances through visit of the following dept /superiors</p>	
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		<ul style="list-style-type: none"> <li>• Agronomic advisory report and fertilizer recommendation minimum 1x/year to monitor matters relating to; <ul style="list-style-type: none"> <li>▪ nutrient deficiency, fertilizer program,</li> <li>▪ pest &amp; disease Ganoderma infection, rat and RB attack,</li> <li>▪ EFB mulching program for the year etc.</li> </ul> </li> <li>• General Manager and Agronomist Advisory visit producing "Estate Visit Report" at frequency of 2x/year performing assessment relating to; <ul style="list-style-type: none"> <li>▪ land use, capital expenditure, general charges,</li> <li>▪ oil palm (mature &amp; immature area) field condition</li> <li>▪ crop performance and cost</li> <li>▪ vehicles &amp; equipment, amenities,</li> <li>▪ labour and security etc</li> <li>▪ Replanting activities at PR24/PR23/PR22</li> <li>▪ Replanting activities by Contractors are monitored to ensure compliance against the SD Guthrie Berhad and industry standards.</li> </ul> </li> </ul> <p>Records of follow up action, if any, are retained where necessary. Overall, each of the operating unit has properly maintained the records of monitoring.</p>	
<b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	No new planting in all estates within SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC). Social impact assessment (SIA) was carried out on 5-8/05/2015 for SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) by Social & Environment Projects Unit, Sustainability Compliance Unit, Group Sustainability Management formerly known as PSQM Department. The methodology of the assessment was through field interview with	Complied

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		<p>stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. For existing operations, the operating unit of SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) has documented the continual improvement plan for social in the Social Management Plan. Identified main social aspects and impacts from SIA considered in the plan including the following categories:</p> <ul style="list-style-type: none"><li>- Workers' Housing Condition/Living Improvement</li><li>- Workers' Working Condition</li><li>- External stakeholders feedbacks</li></ul> <p>Improvements conducted by individual operating units within SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) including housing improvement programs, minimum wages achievement monitoring and community contribution programs.</p> <p>For the year 2023/2024, an Environmental Impact Assessment (EIA) was established to identify environmental aspects in all estate activities including the mill. This assessment was documented using Environmental Aspects Impacts Identification and Environmental Impacts Evaluation forms, covering all activities in the estates and mill. The EIA was conducted in accordance with established Standard Operating Procedures (SOP), as outlined in the SOP Standard Operating Manual, subsection 5.4: Planning, and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure. Sample of activity verified were:</p> <p>Estates</p> <ol style="list-style-type: none"><li>1. Grass cutting</li><li>2. Parking vehicle</li><li>3. Herbicide spraying</li></ol>	
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		<p>4. Maintenance station  5. Store cleaning  Mill  1. Steriliser  2. Boiler  3. Laboratory  4. EFB dumpsite  5. Final discharge</p> <p>The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records:</p> <ul style="list-style-type: none"> <li>• Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, (version 1; year 2008 Issue no. 1; dated 1 April 2009 Register)</li> <li>• Appendix 5.4.1c - Environmental Aspect and Impact Identification form (version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EIA)</li> <li>• Appendix 5.4.1d – Environmental Impacts Evaluation form (version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE)</li> </ul>	
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>Each operating units under SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) has established site specific social management plan. The plan includes objectives, category, action, frequency, person in charge and monitoring period.</p> <p>Among others as summarized below:</p> <p>a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor's workers and to maintain housing and facilities provided to workers). based on</p>	Non-compliance

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		<p>inputs received from external stakeholders during stakeholder meetings, union meetings, EWC meetings, and Gender Committee</p> <p>b) To contribute to local communities development based on inputs received from external stakeholders during stakeholder meetings, union meetings, EWC meetings, and Gender Committee meetings.</p> <p>c) Among the issues considered with the stakeholders include:</p> <p>There is no new planting in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC). Methodology of assessment is based on interview at workstation for harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government &amp; School. The secondary data collection – document review/file checking also been made. Main aspects/concerns identified by the assessor:</p> <ul style="list-style-type: none"> <li>- Housing condition/living improvement</li> <li>- Working condition</li> </ul> <p>d) Engagement process with internal and external stakeholders.</p> <p>Union meeting – Monthly meeting during social dialog</p> <p>Stakeholder meeting – Feedback/complaints/request</p> <p>Development of social management plan is based on the aspect identified for each specific category. For external stakeholders, inputs from engagement process through annual stakeholder meeting (per SOU basis) will used as basis/reference for development of management plan. At Pengkalan Bukit Estate, Social Management Plan dated 1/10/2024 has included all related issues for those attended the annual stakeholder meeting on 12/9/2024. An onsite consultation carried out with relevant stakeholders (contractor/vendor/OCP/school representative/ villagers) to confirm any unresolved issues with SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) estates and mill. Village heads from Kg Seri Menanti, Kg</p>	
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		<p>Sebusu, Sari Baru and Panjang Sari highlighted a few issues with regards to flash flood/drain maintenance/road safety/social issue - burglary issue during the meeting. These issues have not been incorporated in the management plan for further monitoring and action. Process of ensuring representative participation of affected stakeholders in the development of management plan was not clearly demonstrated. Thus, a minor was issued. The SEIA, along with its management and monitoring plan, were continuously reviewed and updated with the participation of affected stakeholders, both internal among employees and external stakeholders, with the latest external stakeholder consultation meeting.</p> <p>The management already establish the environmental management plan for Mill / Estate base on EIA and EIE and also department of environment requirement (<i>Jadual Pematuhan</i>). The plan for environmental as per below:</p> <table><tr><th>Improvement issue</th><th>Action Plan</th></tr><tr><td rowspan="2">Waste reduction</td><td>To properly manage all usage of oil with proper tracking</td></tr><tr><td>Improve / rectify all the leaking hydraulic oil and lubricant oil at machinery</td></tr><tr><td rowspan="3">People</td><td>Implement total productive maintenance and 5s activity in every station</td></tr><tr><td>Mill give support if worker need to do festival event</td></tr><tr><td>Mill management provide grievances platform for workers to complaint if any</td></tr><tr><td rowspan="2">Planet</td><td>Locate proper oil trap to avoid the chemical go into monsoon drain</td></tr><tr><td>Store schedule waste at specific area that mill have prepared for it</td></tr></table>	Improvement issue	Action Plan	Waste reduction	To properly manage all usage of oil with proper tracking	Improve / rectify all the leaking hydraulic oil and lubricant oil at machinery	People	Implement total productive maintenance and 5s activity in every station	Mill give support if worker need to do festival event	Mill management provide grievances platform for workers to complaint if any	Planet	Locate proper oil trap to avoid the chemical go into monsoon drain	Store schedule waste at specific area that mill have prepared for it	
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		Manage schedule waste that should be disposed by the authorized contactor for every 6 months	
		This has been monitored by the management unit with PIC, timeframe and the status of implementation.	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The Social Impact Assessment Management Plan available for each unit were made available and having information i.e. issues, management plan, PIC and time frame. The inputs gathered from the meeting minutes as per the following;</p> <ul style="list-style-type: none"> <li>a) Gender Committee (once every 3 months), NUPW @ Union meeting (monthly combined during social dialog session)</li> <li>b) Safety Meeting (quarterly)</li> <li>c) Complaint &amp; Request from internal &amp; external stakeholders and muster briefing).</li> <li>d) Stakeholders meeting (annual meeting)</li> <li>e) Social dialog (monthly), EWC (Employee Welfare Committee – quarterly)</li> </ul> <p>The inputs will be used to monitor the performance of the established plan and to review and update the plan in participatory way.</p> <p>The management plan, established based on operations with significant environmental impacts, undergoes annual review. It outlines environmental issues, mitigation actions, monitoring plans, and assigns responsibilities for implementation oversight. Among the plan established were:</p> <ul style="list-style-type: none"> <li>1. Environmental management plan <ul style="list-style-type: none"> <li>- To review EAI/EIE for any changes in operation</li> <li>- Create further awareness on recycling among workers through training</li> </ul> </li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Monitoring of estate quarters</li> </ul> <p>2. Waste Management Plan</p> <ul style="list-style-type: none"> <li>- Maintain inventory of SW</li> <li>- Inventory for storage of SW</li> <li>- Put signages and centralised all the waste of scrap iron bay</li> </ul> <p>3. Pollution Prevention Plan</p> <ul style="list-style-type: none"> <li>- Ensure the preventive maintenance vehicles checklist were in place. Regularly inspection is carried out to these vehicles.</li> <li>- To place a tray under neath the vehicles</li> </ul> <p>4. Water Management Plan</p> <ul style="list-style-type: none"> <li>- Water supply to purchase from SAJ</li> <li>- Awareness of water consumption</li> <li>- To carry out immediately repair of broken pipelines and identify any leakages.</li> </ul> <p>5. IPM Management Plan</p> <ul style="list-style-type: none"> <li>- Intensive planting of beneficial plant</li> <li>- Fixing barn owl box achieve target ration 1:10</li> <li>- IPM Bagworm refreshment training</li> </ul>	
<b>Criterion 3.5:</b> A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The Human Resource Department at HQ has established the Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019, and the Workforce Management Unit Liaison &amp; Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016). Additionally, a foreign workers management process flow (IOM dated 25th March 2022, ref: CEOUM/014/03/ 2022) has been defined for six processes:</p> <ul style="list-style-type: none"> <li>- 01: Arrival of new workers and Deployment to Operating Unit</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- 02: Permit endorsement for newly arrived workers</li> <li>- 03: Permit renewal</li> <li>- 04: Repatriation</li> <li>- 05: Abscondment</li> <li>- 06: Leave request</li> </ul> <p>The additional documents established to further defined related recruitment processes for both local and foreign workers. The recruitment of foreign workers is carried out by HQ through appointed agents in the respective countries.</p> <p>The procedures were communicated to workers during contract signing sessions and training sessions conducted by the management of the respective operating units of the UoC. The procedures related to the recruitment of foreign workers were also briefed to the appointed agents.</p> <p>Interviews conducted with a random sample of workers (including both local and foreign workers) confirmed that they understand the procedures. Workers mentioned that if they have any inquiries about the procedures, they can easily approach management, who are open to briefing and discussing the procedures with them. As of the audit, workers have expressed understanding and satisfaction with the implementation of the procedures by the respective operating unit management of the UoC.</p>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. The latest recruitment of workers i.e. (local workers) in Pagoh POM was on 25<sup>th</sup> March 2024. All related personal and induction records were kept for reference (identity information (ID), PDPA declaration, briefing. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish job vacancy advertisement/flyer at the places nearby the villages.</p>	Complied



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<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Each Operating Unit of SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) is adopting OSH Risk Management Procedure (UM/HSE/SP/01, dated 09/03/2021). The objectives of this procedures are to:</p> <ol style="list-style-type: none"> <li>(1) To define the requirements for management of safety and health related risks within Upstream Malaysia</li> <li>(2) To ensure that all safety and health risks, inherent or residual, are effectively managed.</li> <li>(3) To set the standards in developing HIRARC in estates and mills</li> <li>(4) To identify all the hazards in the workplace</li> <li>(5) To assess the risks of respective hazards and formulate control measure to mitigate them</li> <li>(6) To set the objective, target, HSE programs and generating safe work procedures (if not available, absent or not adequate) for all work activities from the output of risk activities</li> <li>(7) To create a safe working environment for workers</li> </ol> <p><u>Pagoh Palm Oil Mill:</u></p> <p>Hazard Identification, Risk Assessment and Risk Control (HIRARC): Hazards and risks include all work activities, use of machinery/non-machinery, all staff and employees, contract workers, visitors, people dealing with the project, and people on the SD Guthrie premises.</p> <p>Evident from the HIRARC established that the POM management adequately assessed the HIRARC. Risk assessment (HIRARC) carried out on all operations, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, chemicals, accident, fire, fuel spillage, working at heights, working in</p>	Complied

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		<p>confined space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc. and "permit to work system" for the mill.</p> <p>Verified that additional HIRARC reviews also made by the Safety &amp; Health team upon occurrence of incidences or accidents. The latest review was done in August 2024 for the mill. Sample for list register for HIRARC had been verified for activity at loading ramp, sterilizer, oil room, boiler, workshop, store area, etc.</p> <p>Chemical Health Risk Assessment (CHRA) was conducted in the mill in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. The CHRA was conducted by HQ/15/ASS/00/363 on 07/04/2023. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management.</p> <p>Noise Risk Assessment (NRA) was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA was conducted by HQ/09/PEB/00/00067 on 19/05/2020. Additional NRA was conducted by HQ/16/PEB/00/158 on 03/11/2022. Report No. HQ/LPROYKPEB/22/00 dated 03/12/2022 stated that the assessment was conducted for Similar Exposure Group (SEG) of dewatering plant operator. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor from both assessments have been implemented accordingly by the management.</p> <p><u>Lanadron Estate:</u></p> <p>Hazard Identification, Risk Assessment and Risk Control (HIRARC) was available to address all risk and hazards associated to the operations in the estate. HIRARC include all work activities, use of machinery/non-</p>	
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		<p>machinery, all staff and employees, contract workers, visitors, people dealing with the project, and people on the SD Guthrie premises.</p> <p>Risk assessment (HIRARC) carried out on all operations, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/ chemicals, accident, fire, fuel spillage, working at heights, working in confined space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc.</p> <p>Evident from the HIRARC established that the estate management adequately assessed the HIRARC. Verified that additional HIRARC reviews also made by the Safety &amp; Health team upon occurrence of incidences or accidents. The latest review was done in Jun-2024. Sample for list register for HIRARC had been verified for activity at workshop, store area, land irrigation, P&amp;D, pruning, spraying, tractor driving, buffer zone, harvesting.</p> <p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The CHRA was conducted by HQ/15/ASS/00/363 on 20/05/2024. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management.</p> <p>Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA was conducted by HQ/16/PEB/00/158 on 25/07/2020. Additional NRA conducted by HQ/16/PEB/00/158 on 26/09/2022 for Similar Exposure Group (SEG) of ST GEO operator, Rabbit Mower Operator, SES Operator, Land surf Operator, and trunk injection operator. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the</p>	
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		<p>recommendations by the assessor for both assessments have been implemented accordingly by the management.</p> <p><u>Pengkalan Bukit Estate:</u></p> <p>Hazard Identification, Risk Assessment and Risk Control (HIRARC) include all work activities, use of machinery/non-machinery, all staff and employees, contract workers, visitors, people dealing with the project, and people on the SD Guthrie premises.</p> <p>The HIRARC carried out on all operations, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/ chemicals, accident, fire, fuel spillage, working at heights, FFB harvesting, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc.</p> <p>Evident from the HIRARC established that the estate management adequately assessed the HIRARC. Verified that additional HIRARC reviews also made by the Safety &amp; Health team upon occurrence of incidences or accidents. The latest review was done on 24/09/2024 due to accident occurred on harvester on 15/09/2024. Sample for list register for HIRARC had been verified for activity at workshop, store area, land irrigation, P&amp;D, pruning, spraying, tractor driving, buffer zone, harvesting.</p> <p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The CHRA was conducted by HQ/15/ASS/00/363 on 15/05/2024. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management.</p>	
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		<p>Noise Risk Assessment (NRA) was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA was conducted by HQ/18/PEB/00/00021 on 07/07/2020. Additional NRA was conducted by HQ/16/PEB/00/158 on 22/03/2023 for the type of similar exposure group (SEG) of carabao operator, ASP operator, ST Geo Operator. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor for both assessments have been implemented accordingly by the management.</p> <p><u>Pagoh Estate:</u></p> <p>Hazard Identification, Risk Assessment and Risk Control (HIRARC): Hazards and risks include all work activities, use of machinery/non-machinery, all staff and employees, contract workers, visitors, people dealing with the project, and people on the SD Guthrie premises.</p> <p>Risk assessment (HIRARC) carried out on all operations, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/ chemicals, accident, fire, fuel spillage, working at heights, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc.</p> <p>Evident from the HIRARC established that the estate management adequately assessed the HIRARC. Verified that additional HIRARC reviews also made by the Safety &amp; Health team upon occurrence of incidences or accidents. The latest review was done in Jan 2024. Sample for list register for HIRARC had been verified for activity at workshop, store area, land irrigation, P&amp;D, pruning, spraying, tractor driving, buffer zone, harvesting, nursery.</p> <p>Chemical Health Risk Assessment (CHRA) was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals</p>	
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		<p>Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The CHRA was conducted by HQ/15/ASS/00/363 on 13/05/2024. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management.</p> <p>Noise Risk Assessment (NRA) was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. Noise Risk Assessment (NRA) was conducted by HQ/18/PEB/00/00182 on 14/07/2020. Additional NRA was conducted for SEG of ST Geo Driver and MS Racker Driver on 26/09/2022, which conducted by HQ/16/PEB/00/158. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management.</p> <p>Based on the above assessments, it is verified that all operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The Annual Health and Safety Plan for the estate and mill is primarily implemented through the Annual Training Program 2024 and monitored via inspections to address identified health and safety risks. The emphasis is on safe work by providing:</p> <ul style="list-style-type: none"> <li>• Knowledge and skills needed to perform work safely and avoid creating hazards that could place themselves or others at risk.</li> <li>• Awareness and understanding of workplace hazards and how to identify, report, and control them.</li> <li>• Specialized training when work involves unique hazards.</li> </ul> <p>In addition to formal classroom training, other methods include on-the-job training and worksite demonstrations to effectively convey safety concepts,</p>	Complied

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		<p>ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored through:</p> <ul style="list-style-type: none"><li>• Internal audits conducted by the Group Sustainability Department.</li><li>• Work Site Inspections (WSI) by the site OSH Committee.</li><li>• Direct involvement of supervisors and rounds by the Assistant Manager.</li><li>• Safety incident reporting via Rapid4.</li><li>• Health and medical surveillance.</li><li>• Chemical exposure monitoring.</li><li>• Audiometric monitoring.</li><li>• Daily monitoring checklists, such as the PPE Checklist.</li></ul> <p>To identify and report potential hazards that can be removed or avoided, the respective operating unit of the UoC conducts workplace inspections. Based on the records review, these inspections are usually conducted before OSH meetings. Verified from the Workplace Inspection Record and OSH meeting minutes, workplace inspections were conducted effectively and accordingly.</p> <p>Local Exhaust Ventilation (LEV) Monitoring and Chemical Exposure Monitoring (CEM):</p> <ul style="list-style-type: none"><li>• Annual LEV Examination &amp; Testing: Conducted to comply with Regulation 17(1)b of the Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000. The latest assessment was conducted by HQ/16/JHII/00/23 on 07/03/2024. The report indicates that the Laboratory Fume Cupboard performance complies with ACGIH (American Conference of Governmental Industrial Hygiene) specifications. The LEV System is</li></ul>	
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		<p>inspected monthly as per recommendations, with the latest inspection in September 2024.</p> <ul style="list-style-type: none"> <li>Chemical Exposure Monitoring (CEM): Conducted in compliance with Regulation 26 of the Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000. Conducted by HQ/23/JHI/00/00075 on 12/10/2023. Report No. HQ/23/JHI/00/00075-2023/014 stated that the exposure levels for potassium dichromate as chromium (Cr), n-Hexane, welding fumes, and sodium hydroxide parameters in the Mill Laboratory, Workshop, and Effluent Treatment Plant (ETP) work areas are below limits as per guidelines on Monitoring of Airborne Chemical Hazardous to Health 2022.</li> </ul> <p>Audiometric Testing: Conducted based on recommendations from the Noise Risk Assessment.</p> <ul style="list-style-type: none"> <li>At Pagoh POM, the latest Audiometric Test was conducted by HQ/17/DOC/00/00094 in May 2024 for 92 workers – 80 normal, 8 referred to ENT and retest for PTA, 4 reported to JKKP via JKKP 7. ENT examined the 8 workers in July 2024 – 7 continue on yearly surveillance and 1 repeat in December 2024. The JKKP 7 report dated July 2024 was sighted.</li> <li>At Lanadron Estate, the Annual Audiometric Test 2023 was conducted on 10/10/2023 by HQ/16/DOC/00/508. Report No. AUDIO/23-10/009 dated 26/02/2024 stated that 8 had normal hearing, 2 had hearing impairment, and 7 had hearing loss. These 9 workers were examined by the OHD on 23/02/2024.</li> <li>At Pengkalan Bukit Estate, on 04/12/2023 by HQ/17/DOC/00/00094 on 39 workers – 21 normal, 18 referred to OHD. Then, on 10/01/2024 by HQ/17/DOC/00/00094 on 18 workers – 8 normal, 2 notified to JKKP through JKKP 7 report, 6 on yearly monitoring, 2 referred to ENT.</li> </ul>	
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		<p>Another test on 16/05/2024 by HQ/17/DOC/00/00094 on 7 machine specialists – 5 normal, 2 on yearly monitoring.</p> <ul style="list-style-type: none"> <li>At Pagoh Estate, the latest Audiometric Test in July 2024 by HQ/17/DOC/00/00094 for 44 workers – 29 normal; 6 with hearing loss continue on yearly surveillance; 2 repeat PTA after 3 months (appointment set for 23/10/2023), 3 referred to ENT for investigation (appointment set for 22/01/2025). 4 notified DOSH (reported in July 2024 for all 4 cases).</li> </ul> <p>The OSH Policy was observed to be clearly displayed at prominent locations within the mill and estate. Adequate posters, regulations, and newsletters were prominently exhibited on notice boards. During interviews, workers demonstrated a commendable level of awareness regarding occupational safety and health. Programs aimed at protecting the health and safety of workers were satisfactorily implemented.</p> <p>The results of monitoring are discussed at meetings and communicated to employees, and where applicable, appropriate corrective actions are taken.</p> <p>From the above findings, it is verified that the effectiveness of the H&amp;S plan to address health and safety risks to people is monitored at the respective operating unit of SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC).</p>	
<b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units visited has conducted training need analysis for all employee, management, and contractors. The need analysis was conducted based on the job designation and training required by the job type.</p> <p>Trainings was identified for management, employee and contractors and programmed throughout FY 2024. The training identified covers the safety and health, environmental and social aspect.</p>	Complied

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		<p>Means implemented by SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) were to assess understanding of participants include:</p> <ul style="list-style-type: none"> <li>• Participants completing post-training evaluation/feedback form and give suggestions.</li> <li>• Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended.</li> </ul> <p>Random interviews with workers showed that they understood what RSPO is, the several company's and SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, Safe Practices. etc.</p>	
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records for each staff and workers, including new employees hired to date in year 2024 on RSPO P&amp;C implementation were available for review.</p> <p>In each training record stated the name of the training, the date of the training, the name of the trainee, the list of employees trained, as well as a summary of the training. Sighted training records as per listed:</p> <p>(1) Pagoh Mill: PPE (11/03/2024); Noise Exposure &amp; Hearing Conservation (04/03/2024); First Aid Kit (16/08/2024); Emergency Response Plan (12/06/2024); Fire Drill (12/06/2024); Chemical Handling (06/09/2024); e-SIME+ (22/03/2024); SW Management (03/10/2024); COBC &amp; Whistleblowing (14/02/2024); Prevention on Sexual Harassment (22/04/2024); 3 Grievances Channels (07/06/2024); Suara Kami (24/01/2024)</p> <p>(2) Lanadron Estate: 10 Golden Rules (04/10/2024); First Aid Training (03/10/2024); HCV Refresher Training (02/10/2024); Chemical Spillage (22/08/2024); Scheduled Wastes Management (15/08/2024); Deployment of Force Labour, Prevention &amp; Validation Procedure</p>	Complied

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		<p>(15/07/2024); Bagworm &amp; Trunk Injection (03/07/2024); ILO Briefing (29/05/2024)</p> <p>(3) Pengkalan Bukit Estate: First Aid (04/10/2024); SW Management (02/10/2024); Chemical Handling (02/10/2024); Suara Kami (17/01/2024); Fire Prevention (09/08/2024); SDG Policies (22/07/2024); ILO Indicators Awareness (22/07/2024)</p> <p>(4) Pagoh Estate: Chemical Safety Awareness (04/10/2024); Harvesting Competency (18/09/2024); Chemical &amp; Spraying SOP (21/09/2024); Trunk Injection SOP (21/09/2024); First Aid Awareness (05/10/2024); ERP &amp; Fire Drill (04/10/2024); HCV Awareness (11/09/2024); Manuring SOP (21/09/2024); Prevention on Sexual Harassment (11/07/2024); Employment Contract (11/07/2024)</p> <p>Evaluation of understanding was done, and this was confirmed during on-site interviews with the relevant POM and estates personnel.</p> <p>Overall, records of trainings conducted were properly maintained by each operating unit.</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>Section 14.2 of Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) stated "Mills shall ensure training is provided for relevant personnel carrying out the tasks at each critical control point. Training shall be specific and relevant to the task(s) performed/ critical control points to ensure the personnel is able to demonstrate awareness for the implementation of the relevant standard(s)".</p> <p>Training conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by Regional Sustainability &amp; Quality Management (RSQM) personnel, attended Pagoh Mill Manager, Assistant Mill Manager, Lab Supervisor, Lab Despatch</p>	Complied

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		Operator, Weighbridge Clerk and Auxiliary Police. Latest training conducted was Supply Chain Certification Standard/System on 22/08/2024.	
<b>Criterion 3.8:</b> Supply chain requirement for mills (note: All supply chain requirements are considered as <b>Critical (C)</b> . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p><b>Identity Preserved Module</b></p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Within the certification scope, Pagoh Palm Oil Mill is supported by three (3) primary estates that provide Fresh Fruit Bunches (FFB), which are Pagoh Estate, Pengkalan Bukit Estate, and Lanadron Estate. Additionally, from October 2023 to September 2024, the mill also received and processed RSPO-certified FFBs from Kempas Estate, Sepang Estate, Welch Estate, Tangkah Estate, and Serkam Estate.</p> <ul style="list-style-type: none"> <li>• Sepang Estate certified under Strategic Operating Unit (SOU 8) – East Palm Oil Mill (Certificate No. RSPO 543543, valid until 18/05/2025)</li> <li>• Kempas Estate, Tangkah Estate, and Serkam Estate certified under Strategic Operating Unit (SOU 17) – Kempas Palm Oil Mill (Certificate No. RSPO-PC 00101, valid until 19/05/2025)</li> <li>• Welch Estate certified under Strategic Operating Unit (SOU 18) – Diamond Jubilee Palm Oil Mill (Certificate No. RSPO 591224, valid until 04/10/2026)</li> </ul> <p>From October 2023 to September 2024, there are also eight (8) direct non-certified Outside Crop Producers (OCPs), as listed below:</p> <ul style="list-style-type: none"> <li>• Lxx Axxx Pxxxx &amp; Pxxxx</li> <li>• Bxxxx Exxxxx</li> <li>• Exxxxxxxx Pxxxxx</li> <li>• Exxxxx Exxxxx</li> <li>• Gxx Exxxxx</li> <li>• Jxxxx Lxxxx</li> </ul>	Not Applicable

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		<ul style="list-style-type: none"> <li>• Kxxxxxx Mxxxx</li> <li>• Pxxxxxxxxx Pxxxxxx</li> </ul> <p>There are four (4) indirect non-certified OCPs, also from October 2023 to September 2024, as listed below:</p> <ul style="list-style-type: none"> <li>• Bx Rxxxxx &amp; Pxx</li> <li>• Exx Hxxx Lxxxx</li> <li>• Kxxxxx Sxxxx Txx</li> <li>• Sxx Cxxx Jxx</li> </ul> <p>It has been verified that Pagoh POM processes certified and uncertified FFB without physically separating them. Consequently, the Pagoh POM has opted for the Mass Balance (MB) Module. Thus, this indicator is not applicable.</p>	
3.8.2	<p><b>Mass Balance Module</b></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>Within the certification scope, Pagoh Palm Oil Mill is supported by three (3) primary estates that provide Fresh Fruit Bunches (FFB), which are Pagoh Estate, Pengkalan Bukit Estate, and Lanadron Estate. Additionally, from October 2023 to September 2024, the mill also received and processed RSPO-certified FFBs from Kempas Estate, Sepang Estate, Welch Estate, Tangkah Estate, and Serkam Estate.</p> <ul style="list-style-type: none"> <li>• Sepang Estate certified under Strategic Operating Unit (SOU 8) – East Palm Oil Mill (Certificate No. RSPO 543543, valid until 18/05/2025)</li> <li>• Kempas Estate, Tangkah Estate, and Serkam Estate certified under Strategic Operating Unit (SOU 17) – Kempas Palm Oil Mill (Certificate No. RSPO-PC 00101, valid until 19/05/2025)</li> <li>• Welch Estate certified under Strategic Operating Unit (SOU 18) – Diamond Jubilee Palm Oil Mill (Certificate No. RSPO 591224, valid until 04/10/2026)</li> </ul>	Complied

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		<p>From October 2023 to September 2024, there are also eight (8) direct non-certified Outside Crop Producers (OCPs), as listed below:</p> <ul style="list-style-type: none"> <li>• Lxx Axxx Pxxxx &amp; Pxxxx</li> <li>• Bxxxx Exxxxx</li> <li>• Exxxxxxxx Pxxxxx</li> <li>• Exxxxx Exxxxx</li> <li>• Gxx Exxxxx</li> <li>• Jxxxx Lxxxx</li> <li>• Kxxxxx Mxxxx</li> <li>• Pxxxxxxxx Pxxxxx</li> </ul> <p>There are four (4) indirect non-certified OCPs, also from October 2023 to September 2024, as listed below:</p> <ul style="list-style-type: none"> <li>• Bx Rxxxxx &amp; Pxx</li> <li>• Exx Hxxx Lxxxx</li> <li>• Kxxxxx Sxxxx Txx</li> <li>• Sxx Cxxx Jxx</li> </ul> <p>It has been verified that Pagoh POM processes certified and uncertified FFB without physically separating them. From the Mass Balance Sheet, which was last updated in October 2024 (data up until September 2024), it is confirmed that the mill claims only the volume of oil palm products produced from the processing of certified FFB as Mass Balance (MB). Consequently, Pagoh POM has opted for the Mass Balance (MB) Module.</p>	
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C	The estimated tonnage of Crude Palm Oil (CPO) and Palm Kernel (PK) products that the certified mill could potentially produce is detailed in Section 1 (Table 10) of this public summary report. A review of PalmTrace	Complied

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	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.	also confirmed that the management of the Unit of Certification (UoC) has not requested any Extension of Volume for this current license period.											
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<div>Verification via RSPO PalmTrace confirms that the mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform. The registration was completed by SD Guthrie's Global Trade Marketing (GTM) Department. The mill's registration details in the PalmTrace system are as follows:</div> <table><tr><td>License ID</td><td>CB154587 (Active)</td></tr><tr><td>Member Name</td><td>Strategic Operating Unit (SOU 19) – Pagoh Palm Oil Mill</td></tr><tr><td>Member ID</td><td>RSPO_PO1000001031</td></tr><tr><td>RSPO Membership No.</td><td>1-0008-04-000-00</td></tr><tr><td>Type of Business</td><td>Oil mill</td></tr></table> <div>Based on the RSPO PalmTrace review, confirmed that all transactions are registered in the PalmTrace.</div>	License ID	CB154587 (Active)	Member Name	Strategic Operating Unit (SOU 19) – Pagoh Palm Oil Mill	Member ID	RSPO_PO1000001031	RSPO Membership No.	1-0008-04-000-00	Type of Business	Oil mill	Complied
License ID	CB154587 (Active)												
Member Name	Strategic Operating Unit (SOU 19) – Pagoh Palm Oil Mill												
Member ID	RSPO_PO1000001031												
RSPO Membership No.	1-0008-04-000-00												
Type of Business	Oil mill												
3.8.5	<div>Documented procedures</div> <div>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</div> <div>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</div>	<div>a) The Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) has been revised at Section 9.2, 10.8, Appendix 2 for the inclusion of new clauses under Process Monitoring, Product Despatch, and Rules for FFB Diversion as to reflect the inclusion of RSPO IP Mills with RSPO MB Supply Chain as Scope Extension.</div> <div>b) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Sustainable Supply Chain and Traceability</div>	Complied										

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	<ul style="list-style-type: none"> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<p>Procedure for Upstream Malaysia (Version 02, effective since Jan-2024).</p> <p>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.</p> <p>c) Section 4.1 of Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) stated "The Head of Operating Unit shall have the overall responsibility for the implementation of this SOP".</p> <p>Section 4.2 of Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) stated "The Head of Operating Unit may assign roles to relevant personnel or invite personnel from various departments where necessary to assist in the implementation of this SOP".</p> <p>Appointment letter dated 01/06/2024 issued to the Assistant Manager of Pagoh Palm Oil Mill as Person-In-Charge for Sustainability Certification of Management Systems, which inclusive of the responsible for the implementation of the supply chain requirement for the mill.</p> <p>d) Procedures for receiving and processing certified and non-certified FFBs were addressed at Section 7.0 Receiving FFB at the Mill of the Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024)</p>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</li> </ul>	<p>SD Guthrie Berhad has established procedure entitled Sustainable Supply Chain and Traceability for Upstream Malaysia (Doc. ID. SDP/GSD/202401/SCCS, Ver. No. 02) dated January 2024. Under Section 18.1 of the procedure, stated that annual internal audit shall be conducted in accordance with Internal Audit Procedure (Doc. ID. SDP/GSD/SCU/IAP,</p>	Complied



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	<p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Ver. No. 04) dated April 2024 to determine whether the mill conforms to the Supply Chain Requirement for Mills of RSPO P&amp;C 2018, as well as effectively implements and maintains the standard requirement.</p> <p>Based on records verification, latest internal audit has been conducted on 07/08/2024 on 21/05/2024 by 4 internal auditors from Group Sustainability Department (GSD). None (0) non-conformity was raised during internal audit related to the Supply Chain Requirement for Mills of RSPO P&amp;C 2018, as verified in the internal audit report accessed through Sustainability Certification Online Tracking System (SCOTS). Verification on internal audit checklist found that all requirement of Supply Chain Requirement for Mills of RSPO P&amp;C 2018 are covered during the internal audit.</p> <p>In Section 18.2 and 18.3 of the procedure mentioned at the Indicator 5.5.1 above, the mill shall maintain the internal audit records and report and the outcome of the internal audit and action taken to address non-conformity shall be subject to management review at least annually.</p> <p>Result of internal audit are discussed during management review meeting which has been conducted on 10/06/2024 as verified in the management review minutes meeting.</p> <p>Management review will be conducted annually as outlined in Section 20.1 of procedure entitled Sustainable Supply Chain and Traceability for Upstream Malaysia (Doc. ID. SDP/GSD/202401/ SCCS, Ver. No. 02) dated January 2024.</p> <p>Latest Management Review Meeting (MRM) was conducted on 02/09/2024. This latest MRM was chaired by the Mill Manager and attended by key personnel in the implementation of the Supply Chain Requirement for Mills of RSPO P&amp;C 2018 at the mill i.e., Assistant Manager, General Supervisor, Chief Clerk, Process Supervisor, Process Chargehand, Store Clerk, Auxiliary Policeman, Lab Supervisor, and Protégé. Referred to the minutes of management review meeting, the following topic has been discussed:</p> <p>a. Internal &amp; external audit findings</p>	
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		<ul style="list-style-type: none"> <li>b. Customer feedback</li> <li>c. Process performance and product conformity</li> <li>d. Status of corrections and corrective action</li> <li>e. Follow-up actions from previous management view</li> <li>f. Changes that could affect the RSPO system</li> <li>g. Recommendation for improvement</li> <li>h. Complaints and grievances</li> </ul> <p>Based on the documentation review and interviews with key personnel of the Palm Oil Mill (POM), it has been verified that the Internal Audit and Management Review Meetings are effectively implemented at the Pagoh POM.</p>	
3.8.7	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	<p>Pagoh POM maintain the daily records of all certified and uncertified FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details. The mill has maintained records of FFB received such as Delivery Notes and Weighbridge operator. Sample of FFB delivery records:</p> <p><u>Pagoh Palm Oil Mill Unit of Certification:</u></p> <ul style="list-style-type: none"> <li>(1) The name and address of the seller: Pagoh Estate The loading or shipment / delivery date: 05/10/2024 RSPO Certificate Number: RSPO 600305 (valid until 27/01/2029) The quantity of the FFB delivered: 10,740 KG FFB Delivery Note No.: PE 34287 POM Weighbridge No.: 194225</li> <li>(2) The name and address of the seller: Lanadron Estate The loading or shipment / delivery date: 30/09/2024 RSPO Certificate Number: RSPO 600305 (valid until 27/01/2029)</li> </ul>	Complied

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		<p>The quantity of the FFB delivered: 12,780 KG  FFB Delivery Note No.: 133315  POM Weighbridge No.: 194002</p> <p>(3) The name and address of the seller: Pengkalan Bukit Estate  The loading or shipment / delivery date: 05/10/2024  RSPO Certificate Number: RSPO 600305 (valid until 27/01/2029)  The quantity of the FFB delivered: 11,640 KG  FFB Delivery Note No.: 59854  POM Weighbridge No.: 194224</p> <p>Additionally, from October 2023 to September 2024, the mill also received and processed RSPO-certified FFBs from other RSPO-Certified estates. Sample as below:</p> <p>(1) The name and address of the seller: Kempas Estate  The loading or shipment / delivery date: 19/09/2024  RSPO Certificate Number: RSPO-PC 00101 (valid until 19/05/2025)  The quantity of the FFB delivered: 15,020 KG  FFB Delivery Note No.: 234770  POM Weighbridge No.: 193558</p> <p>(2) The name and address of the seller: Sepang Estate  The loading or shipment / delivery date: 28/09/2024  RSPO Certificate Number: RSPO 543543 (valid until 18/05/2025)  The quantity of the FFB delivered: 36,300 KG  FFB Delivery Note No.: 038847  POM Weighbridge No.: 193967</p> <p>(3) The name and address of the seller: Welch Estate</p>	
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		<p>The loading or shipment / delivery date: 24/08/2024  RSPO Certificate Number: RSPO 591224 (valid until 04/10/2026)  The quantity of the FFB delivered: 12,090 KG  FFB Delivery Note No.: 4889  POM Weighbridge No.: 192101</p> <p>(4) The name and address of the seller: Tangkah Estate  The loading or shipment / delivery date: 19/09/2024  RSPO Certificate Number: RSPO-PC 00101 (valid until 19/05/2025)  The quantity of the FFB delivered: 13,800 KG  FFB Delivery Note No.: 4456  POM Weighbridge No.: 193563</p> <p>(5) The name and address of the seller: Serkam Estate  The loading or shipment / delivery date: 19/09/2024  RSPO Certificate Number: RSPO-PC 00101 (valid until 19/05/2025)  The quantity of the FFB delivered: 13,680 KG  FFB Delivery Note No.: 21567  POM Weighbridge No.: 193546</p> <p>From October 2023 to September 2024, there are also non-certified Outside Crop Producers (OCPs) supplied the FFBs to the Pagoh POM. Sample as below:</p> <p>(1) The name and address of the seller: Axxx Pxxxx &amp; Pxxxx Exxxxx, Alor Gajah, Melaka, Malaysia  The loading or shipment / delivery date: 29/08/2024  RSPO Certificate Number: –  The quantity of the FFB delivered: 32,210 KG</p>	
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		<p>FFB Delivery Note No.: 06025  POM Weighbridge No.: 192338</p> <p>(2) The name and address of the seller: Exxxxxxx Pxxxxx Sxx Bxx, Tampin, Negeri Sembilan, Malaysia  The loading or shipment / delivery date: 03/10/2024  RSPO Certificate Number: –  The quantity of the FFB delivered: 14,020 KG  FFB Delivery Note No.: 4864  POM Weighbridge No.: 194136</p> <p>(3) The name and address of the seller: Kxxxxxx Mxxxx Sxx Bxx, Muar, Johor, Malaysia  The loading or shipment / delivery date: 03/04/2024  RSPO Certificate Number: –  The quantity of the FFB delivered: 3,610 KG  FFB Delivery Note No.: KM 1070  POM Weighbridge No.: 186159</p> <p>(4) The name and address of the seller: Exx Hxxx Lxxxx Cxxxxxxxxxx Sxx Bxx, Jasin, Melaka, Malaysia  The loading or shipment / delivery date: 27/09/2024  RSPO Certificate Number: –  The quantity of the FFB delivered: 30,100 KG  FFB Delivery Note No.: 557068  POM Weighbridge No.: 193897</p> <p>(5) The name and address of the seller: Sxx Cxxx Jxx Sxx Bxx, Muar, Johor, Malaysia  The loading or shipment / delivery date: 05/10/2024</p>	
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		<p>RSPO Certificate Number: –  The quantity of the FFB delivered: 22,680 KG  FFB Delivery Note No.: 314548  POM Weighbridge No.: 194204</p> <p>The Weighbridge Reception serves as a pivotal checkpoint for verifying all incoming Fresh Fruit Bunches (FFB) into the mill. Upon arrival, all suppliers of FFB provide FFB Chits/Delivery Order to the Weighbridge Reception, where thorough document verification is conducted to ensure inclusion of all required information prior to FFB acceptance.</p> <p>During interviews with the weighbridge operator, it was confirmed that she possesses a comprehensive understanding of the document verification process and proficiently documents the sources and tonnage of the received FFB. This critical process is overseen by the Mill Manager, ensuring accountability and adherence to established procedures.</p> <p>The current audit confirms that there is no projected overproduction of certified tonnage, as verified from the Mass Balance Book review. Additionally, a review of PalmTrace shows no Extension of Volume recorded. Consequently, the oil mill has not initiated any communication related to this with the Certification Body (CB).</p> <p>Mechanism for handling non-conforming FFB and/or documents are detailed out at Section 11.0. of the Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024).</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of</p>	<p>Pagoh POM have ensured that the required information for RSPO Certified Products were available in the related documents. Sample of documents for the sale of RSPO Certified CPO and PK were verified to include all required information. Evidence as below:</p> <p><u>CSPO</u>:</p>	Complied

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	<p>documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<ul style="list-style-type: none"> <li>a) The name and address of the buyer: Sxxx Dxxxx Oxxx Pxxx Kxxxx Rxxxxxxx Sxx Bxx, Perlabuhan Klang, Selangor, Malaysia</li> <li>b) The name and address of the seller: Pagoh POM, Muar, Johor, Malaysia</li> <li>c) The loading or shipment / delivery date: 20/04/2024</li> <li>d) The date on which the documents were issued: 19/04/2024</li> <li>e) RSPO certificate number: RSPO 600305, valid until 27/01/2029</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Crude palm Oil (CPO) – RSPO MB</li> <li>g) The quantity of the products delivered: 41,140 KG</li> <li>h) Any related transport documentation: Collection Order (No. 481617); MPOB L3 (No. H024851); Mill Weighbridge (No. 015490); Purchase Contract (No. S/PSD/2404/CPO0016H)</li> <li>i) A unique identification number: RSPO PalmTrace Transaction ID No. TR-07c2fa1b-7d77</li> </ul> <p><u>CSPK</u></p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer: Sxxx Dxxxx Oxxx Cxxxx Ixxxxx KCP Sxx Bxx, Pulau Carey, Selangor, Malaysia</li> <li>b) The name and address of the seller: Pagoh POM, Muar, Johor, Malaysia</li> <li>c) The loading or shipment / delivery date: 28/05/2024</li> <li>d) The date on which the documents were issued: 23/05/2024</li> <li>e) RSPO certificate number: RSPO 600305, valid until 27/01/2029</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CSPK/MB</li> <li>g) The quantity of the products delivered: 42,640 KG</li> </ul>	
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		<p>h) Any related transport documentation: Purchase Contract (No. P/HCI2406/PK0009); Mill Weighbridge Ticket (No. 015602); Collection Order (No. 064929)</p> <p>i) A unique identification number: RSPO PalmTrace Transaction ID No. TR-7446c129-d5e7</p>	
3.8.9	<p><b>Outsourcing Activities</b></p> <p>i) The mill shall not outsource its milling activities. In cases where the 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>Pagoh POM is adopting the Standard Operating Procedure related to Outsourcing Activities as referred to in the Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since January 2024), Section 13.0. According to the SOP, CPO mills cannot outsource processing activities such as refining or crushing.</p> <p>(1) Outsourcing activities for Pagoh POM are limited to CPO and PK transportation.</p> <p>(2) Contract agreement between SD Guthrie Berhad and the appointed transporter:</p> <ul style="list-style-type: none"> <li>• Pagoh POM retains legal ownership of all input materials included in the outsourced process.</li> <li>• Letter of Appointment (LOA): Issued to Txx Txxx Kxxx Sxx Bxx as an ad-hoc transporter for crude palm oil (CPO) and Technical Grade Oil (TGO) transportation services, with the contract duration from 01/09/2023 to 31/10/2024. The signed agreement ensures that the appointed certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>• Product Ownership: The mill trades CSPO and CSPK with its buyers, including refineries and/or oleo-chemical plants. According to the agreements, the transporter does not own the transported products; ownership remains with the buyer.</li> <li>• Access for Audits: The signed agreement stipulates that the mill shall ensure the appointed transporter provides relevant access for duly accredited CBs to their respective operations, systems, and all</li> </ul>	Complied



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		information, when announced in advance. The agreement also specifies that all transporters must fulfil and comply with applicable legal requirements, as outlined in Section 8.0, "Obligations, Undertakings, and Covenants of the Transporter."	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Details of contractors are available in the list of contractors. There are no changes on the list of contractors when comparing from previous audit result.	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.	The list of contractors is updated from time to time by the mill. The information of any newly appointed contractor is shared with BSI through pre-audit information request prior to the audit. The information is provided to the assessment team. There are no changes on the list of contractors when comparing from previous audit result.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> <li>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.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>i) Pagoh Palm Oil Mill diligently maintains all records in compliance with the RSPO Supply Chain Certification System (SCCS) requirements. Various records including mass balance records, training records, despatch documents, and internal audit reports were readily available for verification.</li> <li>ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 of the Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024).  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.</li> <li>iii) For the Mass Balance Module, Pagoh POM has thoroughly maintained all records and ensured the balance of RSPO certified Fresh Fruit Bunches (FFB), Crude Palm Oil (CPO), and Palm Kernel (PK) deliveries.</li> </ul>	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>The certified CPO and PK dispatched were accurately deducted from the material accounting system.</p> <p>For the outgoing CSPO/MB &amp; CSPK/MB recording purposes, the management will incorporate the record in the existing "KKS Pagoh Mass Balance Sheet Oct 2023 – Sept 2024 (updated in Oct 2024)" excel sheet. Based on the review, by using mock data, it is confirmed that the record is capable to meet the purposes.</p> <p>Overall, the implementation of the Supply Chain Requirements for Mills outlined in the RSPO Principles and Criteria 2018 remains unchanged for the Pagoh Palm Oil Mill. This is related to the incoming FFBs, outgoing CPO and PK, maintenance of RSPO PalmTrace records, and documentation upkeep, among others.</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>The extraction rate for mill is calculated in daily production detail report. Conversion factor of CPO and PK production is depending on the actual OER and KER.</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>Conversion factor of CPO and PK production is depending on the actual OER and KER. The OER and KER is calculated on a daily basis and recorded in the monthly production report. As per September 2024 Monthly Production Summary Report updated in Oct 2024:</p> <table><tr><td></td><td>This Month (Sept 2024)</td><td>To Date (Jan 2024 – Sept 2024)</td></tr><tr><td>OER (%)</td><td>20.00</td><td>19.15</td></tr><tr><td>KER (%)</td><td>4.64</td><td>4.77</td></tr></table>		This Month (Sept 2024)	To Date (Jan 2024 – Sept 2024)	OER (%)	20.00	19.15	KER (%)	4.64	4.77	Complied
	This Month (Sept 2024)	To Date (Jan 2024 – Sept 2024)										
OER (%)	20.00	19.15										
KER (%)	4.64	4.77										

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3.8.15	<p><b>Processing</b></p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Within the certification scope, Pagoh Palm Oil Mill is supported by three (3) primary estates that provide Fresh Fruit Bunches (FFB), which are Pagoh Estate, Pengkalan Bukit Estate, and Lanadron Estate. Additionally, from October 2023 to September 2024, the mill also received and processed RSPO-certified FFBs from Kempas Estate, Sepang Estate, Welch Estate, Tangkah Estate, and Serkam Estate.</p> <ul style="list-style-type: none"> <li>• Sepang Estate certified under Strategic Operating Unit (SOU 8) – East Palm Oil Mill (Certificate No. RSPO 543543, valid until 18/05/2025)</li> <li>• Kempas Estate, Tangkah Estate, and Serkam Estate certified under Strategic Operating Unit (SOU 17) – Kempas Palm Oil Mill (Certificate No. RSPO-PC 00101, valid until 19/05/2025)</li> <li>• Welch Estate certified under Strategic Operating Unit (SOU 18) – Diamond Jubilee Palm Oil Mill (Certificate No. RSPO 591224, valid until 04/10/2026)</li> </ul> <p>From October 2023 to September 2024, there are also eight (8) direct non-certified Outside Crop Producers (OCPs), as listed below:</p> <ul style="list-style-type: none"> <li>• Lxx Axxx Pxxxx &amp; Pxxxx</li> <li>• Bxxxx Exxxxx</li> <li>• Exxxxxxxx Pxxxxx</li> <li>• Exxxxx Exxxxx</li> <li>• Gxx Exxxxx</li> <li>• Jxxxx Lxxxx</li> <li>• Kxxxxxx Mxxxx</li> <li>• Pxxxxxxxx Pxxxxxx</li> </ul> <p>There are four (4) indirect non-certified OCPs, also from October 2023 to September 2024, as listed below:</p>	Not Applicable
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		<ul style="list-style-type: none"><li>• Bx Rxxxxx &amp; Pxx</li><li>• Exx Hxxx Lxxxx</li><li>• Kxxxxx Sxxxx Txx</li><li>• Sxx Cxxx Jxx</li></ul> <p>It has been verified that Pagoh POM processes certified and uncertified FFB without physically separating them. From the Mass Balance Sheet, which was last updated in October 2024 (data up until September 2024), it is confirmed that the mill claims only the volume of oil palm products produced from the processing of certified FFB as Mass Balance (MB). Consequently, Pagoh POM has opted for the Mass Balance (MB) Module. Thus, this indicator is not applicable.</p>																															
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>The Shipping Announcements on the RSPO IT platform were carried out by SD Guthrie’s Global Trade Marketing (GTM) Department when RSPO certified products were sold as certified to refineries, crushers, and traders. Based on the RSPO PalmTrace review, it is confirmed that the announcements were made within three months of dispatch, as evidenced by the following samples:</p> <table><tr><th>Transaction ID</th><th>Transaction Date</th><th>Product Supply Chain Model</th><th>Volume</th><th>Status</th></tr><tr><td>TR-b2209ba6-3cdd</td><td>6/9/2024</td><td>CSPK Mass Balance</td><td>66.1</td><td>Shipping Confirmed</td></tr><tr><td>TR-696faf4b-8556</td><td>12/8/2024</td><td>CSPK Mass Balance</td><td>32.4</td><td>Shipping Confirmed</td></tr><tr><td>TR-162dbe28-87c4</td><td>25/6/2024</td><td>CSPK Mass Balance</td><td>32.06</td><td>Shipping Confirmed</td></tr><tr><td>TR-7446c129-d5e7</td><td>12/6/2024</td><td>CSPK Mass Balance</td><td>83.9</td><td>Shipping Confirmed</td></tr><tr><td>TR-07c2fa1b-7d77</td><td>15/5/2024</td><td>CSPO Mass Balance</td><td>122.72</td><td>Shipping Confirmed</td></tr></table>	Transaction ID	Transaction Date	Product Supply Chain Model	Volume	Status	TR-b2209ba6-3cdd	6/9/2024	CSPK Mass Balance	66.1	Shipping Confirmed	TR-696faf4b-8556	12/8/2024	CSPK Mass Balance	32.4	Shipping Confirmed	TR-162dbe28-87c4	25/6/2024	CSPK Mass Balance	32.06	Shipping Confirmed	TR-7446c129-d5e7	12/6/2024	CSPK Mass Balance	83.9	Shipping Confirmed	TR-07c2fa1b-7d77	15/5/2024	CSPO Mass Balance	122.72	Shipping Confirmed	Complied
Transaction ID	Transaction Date	Product Supply Chain Model	Volume	Status																													
TR-b2209ba6-3cdd	6/9/2024	CSPK Mass Balance	66.1	Shipping Confirmed																													
TR-696faf4b-8556	12/8/2024	CSPK Mass Balance	32.4	Shipping Confirmed																													
TR-162dbe28-87c4	25/6/2024	CSPK Mass Balance	32.06	Shipping Confirmed																													
TR-7446c129-d5e7	12/6/2024	CSPK Mass Balance	83.9	Shipping Confirmed																													
TR-07c2fa1b-7d77	15/5/2024	CSPO Mass Balance	122.72	Shipping Confirmed																													

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		TR-339465d2-a00d	15/5/2024	CSPO Mass Balance	712.41	Shipping Confirmed	
		TR-1a9211bc-774a	15/5/2024	CSPO Mass Balance	10.93	Shipping Confirmed	
		TR-f9469f31-a626	7/5/2024	CSPO Mass Balance	248.96	Shipping Confirmed	
		During the previous license period, two removal transactions were completed by SD Guthrie’s Global Trade Marketing (GTM) Department, as detailed below:					
		Transaction ID	ST-TR-692bfe98-aba9	ST-TR-f86110a8-357b			
		Creation Date	24/01/2024	24/01/2024			
		Product	CSPO	CSPK			
		Volume (MT)	7,743.12	4,925.68			
		For the current license period, the removal transaction will be conducted at the end of the license period.					
		In accordance with the Section 12.1 of Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) stated “Any claims regarding the use of or support of certified oil palm products shall comply with the rules of respective certification scheme (e.g., RSPO, MSPO). For RSPO, refer to the latest RSPO Rules on Market Communication and Claims”., it is confirmed that no evidence has been found to date of any incorrect or inappropriate claims made at this specific unit.					
3.8.17	Claims 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.	It has been verified that the relevant outgoing paperwork correctly indicates the necessary information on product claims, including the applicable Supply Chain model and certificate number. Additionally, during the audit, it was confirmed that the mill does not utilize the RSPO corporate					Complied

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		logo or trademark logo, ensuring compliance with the guidelines regarding their use.	
<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a “non-product related” claim.	The SD Guthrie has highlighted its RSPO membership and its commitment to the objectives and principles of RSPO via Sime Darby Plantation’s (SDP) 2023 Sustainability Report, which can be access through: <a href="https://www.sdguthrie.com/wp-content/uploads/2024/05/Sime-Darby-Plantation-Sustainability-Report-2023-1.pdf">https://www.sdguthrie.com/wp-content/uploads/2024/05/Sime-Darby-Plantation-Sustainability-Report-2023-1.pdf</a>	Complied
4.2	In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member’s history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership	SD Guthrie has expressed its support for the work of the RSPO and detailed its history with the organization in Sime Darby Plantation’s (SDP) 2023 Sustainability Report. The report can be accessed at: <a href="https://www.sdguthrie.com/wp-content/uploads/2024/05/Sime-Darby-Plantation-Sustainability-Report-2023-1.pdf">https://www.sdguthrie.com/wp-content/uploads/2024/05/Sime-Darby-Plantation-Sustainability-Report-2023-1.pdf</a>  Details of RSPO Trademark License of SD Guthrie Berhad as below: <ul style="list-style-type: none"><li>• License No.: RSPO-1106024</li><li>• License Start Date: 23/06/2023</li><li>• License Expiration: 22/06/2025</li></ul> However, in the corporate communications, no usage of RSPO Trademark License.	Complied
4.3	Members are <b>not allowed</b> to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Based on the desktop studies, site visit and documentation review, it is confirmed that there is no usage of the RSPO corporate logo.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	Based on the desktop studies and documentation review, it is confirmed that there is no statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	Complied

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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"> <li>• "We have been sourcing RSPO certified palm oil since (YEAR)."</li> <li>• "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year."</li> <li>• "We have been RSPO certified since (YEAR)."</li> <li>• "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil."</li> <li>• "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified."</li> <li>• "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits."</li> <li>• "We are RSPO certified. Ask us for our RSPO certified products."</li> </ul>	<p>Evident from the Sime Darby Plantation's (SDP) 2023 Sustainability Report that the management has made statements that highlight their RSPO certification status and product-related claims in their corporate communication tools which complied with the requirement of RSPO Market Communication and Claims 2020. The report can be accessed at: <a href="https://www.sdguthrie.com/wp-content/uploads/2024/05/Sime-Darby-Plantation-Sustainability-Report-2023-1.pdf">https://www.sdguthrie.com/wp-content/uploads/2024/05/Sime-Darby-Plantation-Sustainability-Report-2023-1.pdf</a></p>	Complied
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>As indicated on the RSPO website (<a href="https://rspo.org/members/1-0008-04-000-00/">https://rspo.org/members/1-0008-04-000-00/</a>), SD Guthrie Berhad has been an RSPO member since 07 September 2004, holding RSPO Membership No. 1-0008-04-000-00. Therefore, this specific indicator is deemed Not Applicable for this UoC.</p>	Not Applicable

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	<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>		
<b>Product-specific communications</b>			
<b>5.1 General</b>			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the UoC does not make on-pack claims. However, it has been noted that off-pack claim is made by the UoC through shipping documents and invoices, specifically for RSPO-certified Crude Palm Oil (CPO) and Palm Kernel (PK). Additionally, an off-pack claim is also stated in Sime Darby Plantation's (SDP) 2023 Sustainability Report. The report can be accessed at: <a href="https://www.sdguthrie.com/wp-content/uploads/2024/05/Sime-Darby-Plantation-Sustainability-Report-2023-1.pdf">https://www.sdguthrie.com/wp-content/uploads/2024/05/Sime-Darby-Plantation-Sustainability-Report-2023-1.pdf</a>	Complied
5.1.2	Product-specific communications are voluntary.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the Product-specific communications are made voluntary by the management.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must	Details of RSPO Trademark License of SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) as below:	Complied



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	be shown immediately under or next to the RSPO Label or the statement itself.	<ul style="list-style-type: none"> <li>License No.: RSPO-1106024</li> <li>License Start Date: 23/06/2023</li> <li>License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label. Consequently, further assessment of this requirement cannot be conducted.</p>	
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that there is no usage of any other trademark or label by the management.	Complied
5.1.5	<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"> <li>RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field.</li> <li>Both parties shall inform their certification body in writing about the agreement.</li> <li>The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer.</li> </ul>	The Pagoh Palm Oil Mill processes Fresh Fruit Bunches (FFB) to produce Crude Palm Oil (CPO) and Palm Kernel (PK). It does not operate as a retailer, trader, or distributor. Therefore, this indicator is not applicable.	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	The Pagoh Palm Oil Mill processes Fresh Fruit Bunches (FFB) to produce Crude Palm Oil (CPO) and Palm Kernel (PK). It does not operate as a retailer, trader, or distributor. Therefore, this indicator is not applicable.	Not Applicable

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	remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain		
<b>5.2 Off pack claims</b>			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the UoC does not make on-pack claims. However, it has been noted that off-pack claim is made by the UoC through shipping documents and invoices, specifically for RSPO-certified Crude Palm Oil (CPO) and Palm Kernel (PK). Additionally, an off-pack claim is also stated in Sime Darby Plantation's (SDP) 2023 Sustainability Report. The report can be accessed at: <a href="https://www.sdguthrie.com/wp-content/uploads/2024/05/Sime-Darby-Plantation-Sustainability-Report-2023-1.pdf">https://www.sdguthrie.com/wp-content/uploads/2024/05/Sime-Darby-Plantation-Sustainability-Report-2023-1.pdf</a>	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.	Pagoh POM have ensured that the required information for RSPO Certified Products were available in the related documents. Sample of documents for the sale of RSPO Certified CPO and PK were verified to include all required information. Evidence as below: <u>CSPO:</u> a) The name and address of the buyer: Sxxx Dxxxx Oxxx Pxxx Kxxxx Rxxxxxxx Sxx Bxx, Pelabuhan Klang, Selangor, Malaysia b) The name and address of the seller: Pagoh POM, Muar, Johor, Malaysia c) The loading or shipment / delivery date: 20/04/2024 d) The date on which the documents were issued: 19/04/2024 e) RSPO certificate number: RSPO 600305, valid until 27/01/2029	Complied

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		<p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Crude palm Oil (CPO) – RSPO MB</p> <p>g) The quantity of the products delivered: 41,140 KG</p> <p>h) Any related transport documentation: Collection Order (No. 481617); MPOB L3 (No. H024851); Mill Weighbridge (No. 015490); Purchase Contract (No. S/PSD/2404/CPO0016H)</p> <p>i) A unique identification number: RSPO PalmTrace Transaction ID No. TR-07c2fa1b-7d77</p> <p><u>CSPK</u></p> <p>a) The name and address of the buyer: Sxxx Dxxxx Oxxx Cxxxx Ixxxxx KCP Sxx Bxx, Pulau Carey, Selangor, Malaysia</p> <p>b) The name and address of the seller: Pagoh POM, Muar, Johor, Malaysia</p> <p>c) The loading or shipment / delivery date: 28/05/2024</p> <p>d) The date on which the documents were issued: 23/05/2024</p> <p>e) RSPO certificate number: RSPO 600305, valid until 27/01/2029</p> <p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CSPK/MB</p> <p>g) The quantity of the products delivered: 42,640 KG</p> <p>h) Any related transport documentation: Purchase Contract (No. P/HCI2406/PK0009); Mill Weighbridge Ticket (No. 015602); Collection Order (No. 064929)</p> <p>i) A unique identification number: RSPO PalmTrace Transaction ID No. TR-7446c129-d5e7</p>	
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5.2.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> <li>• If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation.</li> <li>• If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2.</li> </ul>	<p>The Pagoh Palm Oil Mill processes Fresh Fruit Bunches (FFB) to produce Crude Palm Oil (CPO) and Palm Kernel (PK). It does not operate as a retailer, trader, or distributor. Therefore, this indicator is not applicable.</p>	Not Applicable
<b>5.3 On pack claims</b>			
5.3.1	<p>Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, this indicator is Not Applicable.</p>	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</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul>	Not Applicable

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	<p>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"> <li>• RSPO IP/SG CERTIFIED*</li> <li>• Contains RSPO IP/SG palm oil*</li> <li>• Contains RSPO certified palm oil (IP/SG)*</li> </ul> <p><i>*Add RSPO TM Licence Number below or next to the claim.</i></p>	<p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, this indicator is Not Applicable.</p>	
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> <li>• RSPO MIXED*</li> <li>• Contributes to the production of RSPO certified palm oil*</li> <li>• Contains RSPO certified palm oil (MB)*</li> </ul> <p><i>*Add RSPO TM Licence Number below or next to the claim.</i></p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, this indicator is Not Applicable.</p>	Not Applicable
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> <li>• RSPO 50% MIXED*</li> <li>• Contains at least 50% RSPO certified palm oil*</li> </ul> <p><i>*Add RSPO TM Licence Number below or next to the claim.</i></p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, this indicator is Not Applicable.</p>	Not Applicable
	<p>D) For Products covered with Book and Claim (B&amp;C):</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p>	Not Applicable

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

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5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, this indicator is Not Applicable.</p>	Not Applicable
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Mass Balance palm oil content</b>			
	95% of the palm oil content must be RSPO MB-certified.	CPO produce for MB certified containing 100% oil palm content	Complied
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	CPO produce for MB certified containing 100% oil palm content	Complied
<b>Messaging</b>			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> <li>• [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain.</li> </ul>	Pagoh Palm Oil Mill (POM) produces crude palm products and does not engage in the labelling of end products. Therefore, this indicator is not applicable.	Not Applicable

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	<ul style="list-style-type: none"> <li>The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> </ul>		
<b>Product-Specific Communications Labelling</b>			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> <li>The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil".</li> </ul>	Pagoh Palm Oil Mill (POM) produces crude palm products and does not engage in the labelling of end products. Therefore, this indicator is not applicable.	Not Applicable
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established Human Rights Charter dated June 2024 (version 3) where the company is respecting, upholding &amp; no exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC).</p> <p>Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) respect and safeguard human</p>	Complied



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		<p>rights, notion 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 (previously known as Sime Darby Plantation Berhad).</p> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate. For example, training was conducted at Pagoh Estate on 3/10/2024 - Induction Course to Newly Joined workers, COBC Briefing, SD Policy Charter, Grievance Channel, Agreement Briefing, Sexual Harassment Briefing, PDPA and etc.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the estates within SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) do not instigate violence or use any form of harassment in their operations</p>	Complied
<b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) has developed Human Rights Charter last revised 2024 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. 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. Besides, the company has implemented Whistleblowing</p>	Complied

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		<p>Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="https://www.sdguthrie.com/contact-us/">https://www.sdguthrie.com/contact-us/</a></p> <p>Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company. The latest initiative introduced (Impact Workers Helpline) effective from 27/8/2021.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>A Standard Operating Manual (SOM) was established and maintained i.e. Sime Darby Plantation Estate Quality Management System as a system for dealing with complaints and grievance was defined in Sub-section 5.5 Management Responsibility, Appendix 5.5.3.2 Procedure for External Communication, version 2, issue 0, dated 25/5/2015.</p> <p>The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with external communications should be within two weeks of the date of receipt for communication requiring direct feedback (Clause 6.3 of the procedure) and within one week of the completion of the investigation, for communication required investigation. For example the latest training was carried out on 8/01/2024 at Lanadron Estate.</p> <p>Grievance channels was stated in the employment contract (Item 21) as follows:-</p> <ul style="list-style-type: none"> <li>• Union representative at operating unit.</li> <li>• Workers helpline at 0162991411 (via WhatsApp) and call toll free number 1800819741.</li> <li>• Suara Kami at 1800818771 or SMS 01130116031.</li> <li>• Whistleblowing channel at 1800223388 or +60192797553 (08.30 am – 17.30 pm) or email to <a href="mailto:whistleblowing@sdguthrie.com">whistleblowing@sdguthrie.com</a></li> </ul>	Complied

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		All requests and grievances found to be responded within short time by respective recipients mainly workers as verified during on-site consultation.	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow	Complied
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) is deeply committed to promoting sustainable development in local communities through extensive consultation and addressing social and environmental issues. The company's contributions are diverse and aimed at fostering social and environmental benefits.  The company's sustainable development initiatives, including consultations with local communities, are prominently showcased on its website. For example, projects highlighted on the company's website, such as those detailed at: <a href="https://www.yayasansimedarby.com/our-projects/community-health">https://www.yayasansimedarby.com/our-projects/community-health</a> exemplify efforts to address community health needs and enhance well-being.  Specific contributions to community development initiatives by the uoC, derived from consultations with local communities, include: (1) Facilitating Hindu Worship Practices: Supporting the affairs of Hindu workers to worship at the temple by providing clean water.	Complied

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		<p>(2) Support for School Activities: Contributing cash or equipment for various school events, enriching educational opportunities for local students.</p> <p>(3) Community Water Provision: Contributing to providing water access to local communities, addressing essential needs for clean water.</p> <p>(4) Support for Research Initiatives: Assisting final year students at UiTM with research matters and thesis preparation, nurturing academic excellence and knowledge dissemination.</p> <p>These contributions underscore SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad)'s dedication to community development and reflect tangible outcomes resulting from consultations with local communities. By actively engaging with stakeholders and addressing identified needs, the company continues to make meaningful contributions to local sustainable development.</p>											
<b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.													
4.4.1	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Copies of the land titles for all estates are maintained and confirmed to be legally owned by SD Guthrie Berhad. The original copies are kept at the Headquarters office in Petaling Jaya, Selangor, Malaysia. The land is legally designated for the cultivation of oil palms and agricultural use. There are no recorded or known disputes over the ownership of the land, and no changes in land ownership or new acquisitions have occurred since the last assessment. Sampled land titles are as follows:</p> <table><tr><th>Estate</th><th>Title No.</th><th>Lot No.</th><th>Area (hectares)</th><th>Remark</th></tr><tr><td>Pagoh Estate</td><td>9XXX1</td><td>Lot 2159</td><td>1,039.2327</td><td>Freehold<ul style="list-style-type: none"><li>Allocated 31.04 hectares for factory use, including</li></ul></td></tr></table>	Estate	Title No.	Lot No.	Area (hectares)	Remark	Pagoh Estate	9XXX1	Lot 2159	1,039.2327	Freehold <ul style="list-style-type: none"><li>Allocated 31.04 hectares for factory use, including</li></ul>	Complied
Estate	Title No.	Lot No.	Area (hectares)	Remark									
Pagoh Estate	9XXX1	Lot 2159	1,039.2327	Freehold <ul style="list-style-type: none"><li>Allocated 31.04 hectares for factory use, including</li></ul>									

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					factory area, EFB yard, executive housing, staff housing, worker housing, and water catchment pond.	
		Lanadron Estate	3XX4	PTD 7518	603.0368	Leasehold for 99 years (expires on 22/05/2100)
			3XX8	PTD 11995	565.1149	Leasehold for 99 years (expires on 22/05/2100)
			8XXX6	Lot 1007	409.5418	Freehold
			8XX5	Lot 3262	0.31	Freehold
		Pengkalan Bukit Estate	9XXX0	Lot 44	191.6188	Freehold
			8XXX3	Lot 1689	20.6389	Freehold
			9XXX3	Lot 2161	380.2021	Freehold
			8XXX6	Lot 3166	64.2691	Freehold
			4XXXX3	Lot 6356	553.5	Freehold
			9XXX6	Lot 2143	13.7846	Freehold
			4XXX5	Lot 5452	817.7	Freehold
			4XXXX7	Lot 11246	20.82	Freehold
		Copies of the land titles are accessible and duly authenticated, providing specific information that substantiates the legal entitlement to utilize the land. The required quit rents have been promptly paid. There are no indications of any portion of the land conflicting with the claims of customary landholders.				
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.				
		Complied				

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		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.	
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	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
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.  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.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	No issues 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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4.4.3	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</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 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
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>In order to deal with future arising land dispute (if any), 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
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>In order to deal with future arising land dispute (if any), 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
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>In order to deal with future arising land dispute (if any), SD Guthrie Berhad established Human Rights Charter last revised 2020, under Clause 3.1.1 on</p>	Complied

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		handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.	
<b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Based on observations, documentation review, verification through Global Risk Assessment Services System (GRASS), and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 19 – Pagoh Palm Oil Mill Unit of Certification (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	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	Based on observations, documentation review, verification through Global Risk Assessment Services System (GRASS), and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 19 – Pagoh Palm Oil Mill Unit of Certification (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.	Based on observations, documentation review, verification through Global Risk Assessment Services System (GRASS), and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC). The existing estates are not encumbered by any legal, customary and user rights. It was evident	Complied



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	Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	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.	
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, verification through Global Risk Assessment Services System (GRASS), and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 19 – Pagoh Palm Oil Mill Unit of Certification (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, verification through Global Risk Assessment Services System (GRASS), and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 19 – Pagoh Palm Oil Mill Unit of Certification (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, verification through Global Risk Assessment Services System (GRASS), and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 19 – Pagoh Palm Oil Mill Unit of Certification (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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4.5.7	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 19 – Pagoh Palm Oil Mill Unit of Certification (UoC).	Complied
4.5.8	<b>(C)</b> 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
<b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	SOU 19 – Pagoh Palm Oil Mill Unit of Certification (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	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	SOU 19 – Pagoh Palm Oil Mill Unit of Certification (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	Complied

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		calculation and distribution to the affected parties will be determined by Land Management Department.	
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 demarcate land boundaries adds a layer of transparency and visibility, contributing to clear delineation and potentially minimizing disputes over land boundaries.	Complied
4.6.4	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
<b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	SOU 19 – Pagoh Palm Oil Mill Unit of Certification (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	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a	SOU 19 – Pagoh Palm Oil Mill Unit of Certification (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	Complied

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	<p>participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>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.</p>	
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>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 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) has been planted with oil palm for third cycle.</p>	Complied
<b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>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
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>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

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4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> 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 -	<p>The pricing for Fresh Fruit Bunches (FFB) is explicitly detailed in Schedule 3 of the Contract Agreement between SD Guthrie Berhad and the FFB Suppliers. Each supplier has a copy of this agreement for easy reference. In case of any discrepancies regarding weight or payment rates, a grievance procedure is in place to address these issues with the mill management.</p> <p>Additionally, the prices for the current and previous periods are made available to FFB suppliers, as they are publicly posted at the weighbridge office. These prices are calculated based on the Malaysian Palm Oil Board (MPOB) Monthly Average, Mill Oil Extraction Rate (OER), and Kernel Extraction Rate (KER). There have been no changes from the previous report in this regard. The prices displayed at the weighbridge counter are as follows:</p> <ul style="list-style-type: none"> <li>• July 2024: RM 43.52 per 1% of declared OER</li> <li>• August 2024: RM 42.20 per 1% of declared OER</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>September 2024: RM 42.78 per 1% of declared OER</li> </ul>	
5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>Pagoh Palm Oil Mill (POM) processes both RSPO-certified and uncertified Fresh Fruit Bunches (FFB) from plantations, estates, outgrowers, and FFB traders. The mill claims only the volume of oil palm products produced from the certified FFB as Mass Balance (MB) certified. Although no direct smallholders supply FFB to Pagoh POM due to the RSPO's hectareage requirement of 50 hectares, the OCP Upstream Team explained the FFB pricing during the agreement signing.</p>	Complied
5.1.3	<p><b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>The prices for Fresh Fruit Bunches (FFB) are clearly outlined in Schedule 3 of the Contract Agreement between SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) and the FFB Suppliers.</p> <p>The pricing is determined by the MPOB Monthly Average Price for CPO and PK, as well as the OER and KER ratings assigned by Pagoh POM, which has been confirmed through the validation of self-billed invoices from FFB suppliers. As per interview with the management, FFB pricing will be calculated based on daily MPOB pricing for both CPO and PK including other cost such as CESS MPOB, transport costs, storage cost and processing cost.</p>	Complied
5.1.4	<p><b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>There is no binding contract for external FFB suppliers sending crops to Pagoh Palm Oil Mill (POM). Suppliers are free to choose their preferred mill. However, contracts are in place for payment rates, crop quality, and payment methods. It has been found that all parties are involved in the decision-making processes and understand the contracts. Fair pricing, including premium pricing, is agreed upon with collection centers and growers, following the MPOB Pricing Mechanism.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contract agreements for FFB suppliers have been reviewed and are stated within the agreed timeframe. There is evidence that these contracts are legal, fair, and transparent based on verification of sampled agreements. Sample contracts include:</p> <ul style="list-style-type: none"> <li>Lxxxxx Axxx Pxxxx &amp; Pxxxx:</li> </ul>	Complied

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		<p>Agreement No. P/P/0324/FFB04726L between Sime Darby Plantation Berhad (Purchaser) and Gxx Exxxxx Mxxxxxxxx Sxx Bxx (Supplier). Valid from 30/03/2024 to 31/12/2024.</p> <ul style="list-style-type: none"> <li>Exxxxxxx Pxxxx Sxx Bxx: The Oil Palm Fresh Fruit Bunches Agreement No. P/P/0524/FFB04730L between Sime Darby Plantation Berhad (Purchaser) and Exxxxxxx Pxxxx Sxx Bxx (Supplier). Valid from 07/05/2024 to 31/10/2024.</li> <li>Kxxxxxx Mxxxx Sxx Bxx: The Oil Palm Fresh Fruit Bunches Agreement No. P/P/1123/FFB04549L between Sime Darby Plantation Berhad (Purchaser) and Kxxxxxx Mxxxx Sxx Bxx (Supplier). Valid from 01/01/2024 to 31/12/2024.</li> <li>Exx Hxxx Lxxxx Cxxxxxxxxxx Sxx Bxx: The Oil Palm Fresh Fruit Bunches Agreement No. P/P/1123/FFB04554L between Sime Darby Plantation Berhad (Purchaser) and Exx Hxxx Lxxxx Cxxxxxxxxxx Sxx Bxx (Supplier). Valid from 01/01/2024 to 31/12/2024.</li> <li>Sxx Cxxx Jxx Sxx Bxx: The Oil Palm Fresh Fruit Bunches Agreement No. P/P/1123/FFB04556L between Sime Darby Plantation Berhad (Purchaser) and Sxx Cxxx Jxx Sxx Bxx (Supplier). Valid from 01/01/2024 to 31/12/2024.</li> </ul>	
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>The Purchaser shall pay the Supplier for all actual FFB delivered and accepted (Purchase Price) as outlined in Section 5 of the First Schedule. The breakdown of the Purchase Price payment is as follows:</p> <ul style="list-style-type: none"> <li>Purchase Price: Based on the MPOB daily average price. If the MPOB daily average price is unavailable, the MPOB average price for CPO will follow the Peninsular price, and for PK, it will also follow the Peninsular price.</li> <li>Partial Payment:</li> </ul>	Complied

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		<p>70% of the total FFB delivered for the week will be paid the following week.</p> <ul style="list-style-type: none"><li>Remaining Payment: The remaining 30% of the total FFB delivered for each week will be paid on or before the 10th day of the following month.</li></ul> <p>Payments to the above-mentioned FFB suppliers for the month of July 2024, August 2024 and September 2024 have been verified, confirming that payments are made in a timely manner. Receipts specifying price, weight, deductions, and amount paid are provided.</p>																									
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>Each of the weighbridges available at respective operating unit of audited UoC has been calibrated on annual basis by weighing and measuring equipment verification service provider which was appointed by the Federal Government of Malaysia through Ministry of Domestic Trade and Consumer Affairs (KPDNHEP) under <i>Akta Timbang dan Sukat</i> 1972. Evident the Borang D and Calibration Report for each of the weighbridges during the audit as details below:</p> <table><tr><td>Location</td><td>Calibration Report No.</td><td>Maximum Capacity</td><td>Form D No.</td><td>Calibration Date</td></tr><tr><td rowspan="2">Pagoh POM</td><td>A 029757</td><td>60,000 kg</td><td>D228764</td><td>04/09/2024</td></tr><tr><td>A 029758</td><td>80,000 kg</td><td>D228763</td><td>04/09/2024</td></tr><tr><td>Lanadron Estate</td><td>A 036352</td><td>60,000 kg</td><td>D231777</td><td>03/04/2024</td></tr><tr><td>Pengkalan Bukit Estate</td><td>CA 062036</td><td>60,000 kg</td><td>B2166976</td><td>09/12/2023</td></tr></table>	Location	Calibration Report No.	Maximum Capacity	Form D No.	Calibration Date	Pagoh POM	A 029757	60,000 kg	D228764	04/09/2024	A 029758	80,000 kg	D228763	04/09/2024	Lanadron Estate	A 036352	60,000 kg	D231777	03/04/2024	Pengkalan Bukit Estate	CA 062036	60,000 kg	B2166976	09/12/2023	Complied
Location	Calibration Report No.	Maximum Capacity	Form D No.	Calibration Date																							
Pagoh POM	A 029757	60,000 kg	D228764	04/09/2024																							
	A 029758	80,000 kg	D228763	04/09/2024																							
Lanadron Estate	A 036352	60,000 kg	D231777	03/04/2024																							
Pengkalan Bukit Estate	CA 062036	60,000 kg	B2166976	09/12/2023																							
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs</p>	<p>Pagoh POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified</p>	Not Applicable																								



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	the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	FFB as MB certified. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectarage requirement by RSPO (50Ha).	
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Pagoh Palm Oil Mill (POM) receives and processes both RSPO-certified and uncertified Fresh Fruit Bunches (FFB) from plantations, estates, outgrowers, and FFB traders. The mill claims only the volume of oil palm products produced from the processing of certified FFB as Mass Balance (MB) certified. Currently, no direct smallholders supply FFB to Pagoh POM due to the RSPO's hectarage requirement of 50 hectares. However, a procedure for complaints and grievances has been established and documented in the Grievance Response Standard Operating Procedure, dated 18 July 2022.	Complied
<b>Criterion 5.2:</b> 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 -	Pagoh POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified FFB as MB certified. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectarage requirement by RSPO (50Ha).	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Pagoh POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified FFB as MB certified. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectarage requirement by RSPO (50Ha).	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Throughout the audit process, it was ascertained that Pagoh Palm Oil Mill meticulously verifies the validity of the MPOB License for each FFBs supplier, including owned supply bases, SD Guthrie Berhad (previously	Complied

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	- Minor compliance -	known as Sime Darby Plantation Berhad) owned estates, and OCPs. The issuance of the license is the responsibility of MPOB, a government agency entrusted with serving the country's oil palm industry. The licensing process is governed by the Malaysian Palm Oil Board (Licensing) Regulations 2005, under the Malaysian Palm Oil Board Act 1998. This ensures that every FFB received by the mill is in compliance with the regulations set by the Malaysian Government. Additionally, the Malaysian Government mandates that every FFB producer in the country be certified with MSPO (Malaysian Sustainable Palm Oil) certification. The combination of MPOB licensing and MSPO certification demonstrates that Pagoh Palm Oil Mill and its FFB suppliers operate in accordance with the regulations and standards set by the Malaysian Government for the palm oil industry.	
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Pagoh POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified FFB as MB certified. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectarage requirement by RSPO (50Ha).	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Pagoh POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified FFB as MB certified. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectarage requirement by RSPO (50Ha).	Not Applicable
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability,	SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at	Complied

	gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from the company official website: <a href="https://www.sdguthrie.com/wp-content/uploads/2024/08/Human-Rights-Charter.pdf">https://www.sdguthrie.com/wp-content/uploads/2024/08/Human-Rights-Charter.pdf</a>	
6.1.2	<b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	Interviewed with the workers comprises of different gender and nationalities as well as the parolees confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability. The worker can request for job transfer if they found they unfit for the job assigned to them.  Based on group interview with a group of workers consist of (gender committee, workers representatives and union representatives), all of them have not been discriminated against including charging of recruitment fees for foreign workers	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) has developed a Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability, and the leadership quality of the worker. The recruitment of foreign workers is through Human Resource Department in HQ based the regulation requirements.	Complied

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6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Interviewed with the group of female employee has confirmed that pregnancy testing is not part of employment procedure. There was no specific clause in the contract mentioning on the requirement for pregnancy testing. They still will be able to offer for work if they are pregnant.	Complied
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in.  Gender Committee were established by the mill and estates management and verified at each operating unit. Meetings conducted once every 3 months or whenever necessary and for SOU gender representative carried out on monthly basis. There was no sexual harassment case reported so far at SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC).	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Based on the sampled payslips, which consists of both genders, it was noted that workers were paid equally for the same job scope. They were paid according to the Minimum Wage Order 2022 without any form of discrimination. This was also evident through interview with sampled workers	Complied
<b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are	SD Guthrie Berhad (formerly known Sime Darby Plantation Berhad) has signed the Collective Agreement with National Union of Plantation Workers (NUPW). Sample of employment contracts are reviewed, and the	Complied

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	available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Upon the foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company's policies. This has confirmed by interviewed with the foreign workers.				
6.2.2	<b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. - Critical (Major) compliance -	Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955, Minimum Wages Order 2022, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the MAPA/NUPW agreement.	Complied			
6.2.3	<b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. - Critical (Major) compliance -	Based on review of punch cards, workers' employment contracts and payslips, evidence was available that Pagoh POM and estate were able to demonstrate compliance with Employment Contracts 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSO, EPF, EIS) and non-statutory deductions (e.g. union/NUPW, water, electricity bills, etc) in accordance with Labour Office permits. Sampled during the audit were the following workers' employment contracts and payslips for the for following production period for each operating unit as per below:  <u>Pagoh POM</u> (8 workers sampled out of 97 workers, sampling month: July 2024 – peak, November 2023 – low, April 2024 – average). Sample of workers as per the following: <table><tr><td>ID XXX610</td><td>ID XXX165</td><td>ID XXX550</td></tr></table>	ID XXX610	ID XXX165	ID XXX550	Complied
ID XXX610	ID XXX165	ID XXX550				

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		ID XXX338	ID XXX185	ID XXX971		
		ID XXX693	ID XXX399			
		<u>Lanadron Estate</u> 10 workers sampled out of 159 workers, sampling month: July 2024 – peak, February 2024 – low, November 2023 – average). Sample of workers as per the following:				
		ID XXX385	ID XXX997	ID XXX215		
		ID XXX029	ID XXX372	ID XXX220		
		ID XXX541	ID XXX885			
		ID XXX964	ID XXX092			
		<u>Pagoh Estate</u> (10 workers sampled out of 166 workers, sampling month: August 2024 – peak, February 2024 – low, April 2024 – average). Sample of workers from employee listing checked as follows:				
		ID XXX560	ID XXX413	ID XXX579		
		ID XXX404	ID XXX544	ID XXX623		
		ID XXX493	ID XXX795	ID XXX155		
		ID XXX849				
		<u>Pengkalan Bukit Estate</u> (14 workers sampled out of 289 workers, sampling month: August 2024 – peak, February 2024 – low, May 2024 – average). Sample of workers from employee listing checked as follows:				

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		<table><tr><td>ID XXX028</td><td>ID XXX830</td><td>ID XXX831</td></tr><tr><td>ID XXX155</td><td>ID XXX120</td><td>ID XXX377</td></tr><tr><td>ID XXX138</td><td>ID XXX715</td><td>ID XXX670</td></tr><tr><td>ID XXX534</td><td>ID XXX724</td><td>ID XXX251</td></tr><tr><td>ID XXX544</td><td>ID XXX203</td><td></td></tr></table> <p>There were no issues of legal non-compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirement verified from the workers sampled.</p>	ID XXX028	ID XXX830	ID XXX831	ID XXX155	ID XXX120	ID XXX377	ID XXX138	ID XXX715	ID XXX670	ID XXX534	ID XXX724	ID XXX251	ID XXX544	ID XXX203		
ID XXX028	ID XXX830	ID XXX831																
ID XXX155	ID XXX120	ID XXX377																
ID XXX138	ID XXX715	ID XXX670																
ID XXX534	ID XXX724	ID XXX251																
ID XXX544	ID XXX203																	
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) has established Workers Housing Management Procedure and ‘OilPalmPal’ Digital Housing Complaint System (OPP DHCS) to effectively monitor and update house repair works. In addition to the said procedures, additional guidelines on repair completion timeline in workers housing management procedure ver. 1 dated 30/6/2022, ref: CEOUM/HSE/018/06/2022) is referred to. General house rule is written under "<i>Peraturan Umum Kompleks Perumahan Pekerja</i>". Linesite inspection (housing complex/nest/community hall weekly inspections (PIOA) carried out on weekly basis as per req un. No deviation observed based on result of weekly PIOA report against actual onsite condition. This was confirmed during line site visit at respective operating units.</p>	Complied															
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There were sundry shops located in the estates compound. The workers can easily access to adequate, sufficient, and affordable foods and goods. Price of goods was displayed at the sundry shops. Interview with group of workers (gender committee, worker’ representative and union representative) confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using</p>	Complied															

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		their transport until the main guard post and public transport to the nearest town. Sundry shop price was monitored by estate on monthly/quarterly/yearly basis. Latest record of monitoring has shown no sudden price hike and control goods/item sell as per control price set.	
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><b>PROCEDURAL NOTE:</b></p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant</p>	<p>SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) has carried out the Prevailing Wage Assessment and calculated individual local and foreign workers current salary including non-monetary benefit given average SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) for local worker RM: 2,306.07; FW: RM 2,488.99. DLW assessment conducted by Group Sustainability &amp; Quality Manager (GSQM) SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad).</p>	Complied



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	<p>stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>There are no casual workers hired at SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC). All employees hired are permanent employee (for locals and foreign workers) as well under contractor's workers. All permanent and full-time employment or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2. employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC).</p>	Complied

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<b>Criterion 6.3:</b> The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>• Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>• Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</li> </ul> <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</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>Minutes meeting has been made available for all operating units which has been conducted through social dialogue on monthly basis and the minutes meeting been classified as publicly available. There is evidence that the meeting has been attended by workers representative that has been elected by workers from the same origin countries.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p>	<p>Election of workers has been done through WhatsApp's which has been handle by Regional support services and will be calculate and summarized. The outcome will be submitted social welfare services and appointment</p>	Complied

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	- Minor compliance -	letter will be provided. There is evidence representative from different origin countries, gender has been elected for both operating units.	
<b>Criterion 6.4:</b> Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Human Rights Charter version 3 2024 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 recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. They are eradicating the child labour in all their supply chain and not to employ anyone under the age of 18 years.</p> <p>All the contractors were required to read through Vendor COBC before they signed on the Vendor Integrity Pledge where they will be required to comply with labour and human rights. The contractors had also been briefed on the human right charter and prohibition of child labour. This has confirmed with the stakeholders through stakeholder consultation.</p>	Complied
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	Workforce Management Unit has developed SOP under Clause 3.1.14 LR14 – Recruitment Drive where the minimum requirement of the age is 18 years old. Age screening is based on identification documents and/ or passport and from the stated date of birth. The local employees were required to submit a photocopy of identification card during application of job to the management for verification purpose.	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	There was no young person employed by the company as their minimum age was 18 years old. This were verified through checking of the Employee Master Listing and through interview with the stakeholders.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour,	The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the	Complied

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	and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	stakeholders through stakeholders meeting or briefing with the contractors. This had also been confirmed through interview with the stakeholders and contractors.	
<b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims.</li> <li>• Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.</li> </ul> <p>The policy was communicated during muster briefing on 24/01/2024 at Pagoh POM and 8/1/2024 at Pagoh Estate.</p> <p>Interviews conducted with a random sample of workers (including both local and foreign workers) confirmed that they understand the policy. Workers mentioned that if they have any inquiries about the policy, they can easily approach management, who are open to briefing and discussing the policy with them. As of the audit, workers have expressed understanding and satisfaction with the implementation of the policy by the respective operating unit management of the UoC.</p>	Complied
6.5.2	<b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established the Human Rights Charter, version 3 2024 where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. The policy	Complied

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		<p>has been communicated to the workers through musters, trainings and display on notice boards.</p> <p>Interviews conducted with gender committee representatives and a random sample of female workers confirmed their understanding of the policy. They mentioned that if they have any inquiries about the policy, they can easily approach management, who are open to briefing and discussing the policy with them. As of the audit, workers have expressed understanding and satisfaction with the implementation of the policy by the respective operating unit management of the UoC.</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>The assessment of needs for new mothers was conducted by Gender Committee in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC). Among issues identified based on assessment outcome:</p> <ul style="list-style-type: none"> <li>- Request for break time/leave to go for post-natal check after delivery.</li> <li>- Request for break time for breast feed (30 minutes per session)</li> </ul> <p>Management has no objection to approve the request by new mothers and confirmed with the interview with them.</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>	<p>SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) has implemented Grievance Response Standard Operating Procedure, version 3 dated 7 May 2024. The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with internal and external communications has been detailed in the Section 2.2. Flow chart procedure and 3.3 The time scale of investigation.</p> <p>Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="https://www.sdguthrie.com/who-we-are/corporate-governance/report-your-concerns/">https://www.sdguthrie.com/who-we-are/corporate-governance/report-your-concerns/</a></p>	Complied

		<p>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> <p>Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established, and communicated to them.</p> <p>No grievance issues that require the implementation of the mechanism occurs in all operating units within SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) since the last audit.</p>	
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>Charging the workers for recruitment fees.</li> <li>Contract substitution</li> <li>Involuntary overtime</li> <li>Lack of freedom of workers to resign</li> <li>Penalty for termination of employment</li> <li>Debt bondage</li> <li>Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Based on interviews with the workers, and observations made, the following were verified:</p> <p>a. Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Some Indonesian workers has been interviewed and confirmed that passport has been kept by the workers itself. It has been confirmed during site visit to line site where verification passport has been kept at their house.</p> <p>b. Charging of recruitment fee: Workers are not charged any recruitment fees. Interviews conducted with workers also confirmed that they have not been charged any recruitment fees. Contract/agreement between SD Guthrie and labour agency (PT Cahaya Lombok, dated 13/07/2022, ref:WMU/AZA/LOA) extension of contract, letter dated 1/08/2024 valid until 11/07/2025. In this contract/agreement it has been clearly</p>	Complied

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		<p>stipulated the terms and conditions under appendix 3, clause 3.3 – no charging of recruitment fees.</p> <p>Reference: SD Guthrie Berhad (Migrant Worker Responsible Recruitment Procedure, version 3 dated August 2024.</p> <p>c. Involuntary overtime: Based on interviews conducted with the workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work. Sighted written consent from workers to work overtime for Pagoh POM and estates.</p> <p>d. 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 operating units.</p> <p>e. 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. The is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement.</p> <p>f. 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.</p>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>There are migrant workers has been recruited from India, Nepal Indonesia and Bangladesh to work in SOU 19 – Pagoh Palm Oil Mill UoC.</p> <p>As a commitment to manage migrant workers in a good manner and compliance to the requirement SD Guthrie Berhad (formerly known as Sime Darby Plantations Berhad) has adopted the Human Rights Charter, version</p>	Complied

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		<p>3 2024 wherein they have made the following commitments under 3.2 Respect and Uphold Legal Rights</p> <ul style="list-style-type: none"><li>a. Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation.</li><li>b. Committed to provide living wages in line with RSPO P&amp;C standards.</li><li>c. Provide reasonable working hours, adequate rest, achievable productivity targets, voluntary overtime and adequate housing with access to basic needs (transportation and communication services)</li><li>d. Providing a safe and healthy working environment.</li><li>e. Respecting freedom of association</li><li>f. Promoting employee engagement and grievance redressal through grievance mechanisms and employee engagement platforms.</li><li>g. Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</li><li>h. Creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict.</li></ul> <p>It was evident that the policy has been implemented where each process of recruitment has been done such as signing employment contract, interview and consultation with migrant workers at origin countries and One Stop Centre. Through the interview, it has been confirmed that all facilities and benefits has been provided equally for all foreign workers. Passport has been kept by the workers themselves. There is no evidence of contract substitution where all migrant workers have been explained the content of the employment contract at the origin countries</p>	
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<b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Each Operating Unit of SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) has adopted the Safety &amp; Health Committee Procedure (UM/HSE/OCP/08, dated 17/11/2021) with the following objectives:</p> <ul style="list-style-type: none"> <li>• To introduce the concept of consultation and cooperation between the employer and employee through the formation of the Safety and Health Committee (SHC) at the workplace, in compliance with legal requirements.</li> <li>• To ensure two-way communication between employer and employee.</li> <li>• To increase the interest and motivation of employees to participate in safety and health-related programs.</li> </ul> <p>The Malaysian government has mandated that companies appoint an Occupational Safety and Health (OSH) Coordinator to enhance workplace safety and health standards. To comply with the Occupational Safety and Health (Amendment) Act 2022, which came into effect on 01/06/2024, each operating unit of the UoC has registered its own OSH Coordinator. The registration records for each OSH Coordinator are available in the MyKKP system.</p> <p>Respective managers were appointed as ESH Chairmen (PIC) through letters signed by the Central West Regional Chief Executive Officer. Each operating unit then established its own OSH Committee, consisting of a Chairman, Secretary, Employer Representatives, and Employee Representatives. All appointment letters were made available for verification, confirming that the establishment of OSH Committees for each operating unit aligns with the Occupational Safety and Health (Safety and Health Committee) Regulations 1996.</p>	Complied

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		<p>Both the estates and mill management conduct regular two-way communication with their employees through quarterly OSH committee meetings. The agenda for these meetings typically includes:</p> <ul style="list-style-type: none"> <li>• Confirmation of previous meeting minutes</li> <li>• OSH Objectives &amp; Programs (Training, campaigns, etc.)</li> <li>• Legal Compliance Issues (if any)</li> <li>• Safety Tools &amp; Personal Protective Equipment (PPE)</li> <li>• Accident statistics, reports, and investigations</li> <li>• Internal &amp; External Complaints</li> <li>• Training &amp; Competency</li> <li>• Workplace Inspection Reports</li> <li>• Any other matters</li> </ul> <p>Evidence from the minutes of ESH Meetings, which are properly maintained by the respective Operating Unit management, shows that these meetings are conducted at three-month intervals on the following dates:</p> <ul style="list-style-type: none"> <li>• Pagoh POM: 02/09/2024; 03/06/2024; 06/03/2024</li> <li>• Lanadron Estate: 13/09/2024; 18/06/2024; 18/03/2024</li> <li>• Pengkalan Bukit Estate: 02/10/2024; 02/07/2024; 02/04/2024; 05/01/2024</li> <li>• Pagoh Estate: 16/08/2024; 27/05/2024; 05/03/2024</li> </ul> <p>From the meeting minutes and interviews with relevant personnel, it is verified that the meetings are conducted in accordance with the Occupational Safety and Health (Safety and Health Committee) Regulations 1996.</p>	
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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 procedures are in place. Each estate management has formed an Emergency Response Plan (ERP) team, and the organization chart is displayed on notice boards for employee information. Procedures and signs are posted throughout the workplaces in multiple languages understood by the workers, including Malay, English, Urdu, Indonesian, and Tamil.</p> <p>Emergency Response Plans cover Emergency Contact Numbers, Emergency Evacuation, First Aid Locations, Fire Extinguisher Locations, and specific responses for Fire, Chemical Spillage, Chemical Contamination, Flood, and Accidents. These plans are displayed at strategic locations around the mill, estate office, and stores. Competent personnel are appointed and trained to be part of the Emergency Response Team, with appointment letters available for verification. During interviews, employees demonstrated a good understanding of the ERP procedures and plans.</p> <p>During site visits, it was verified that first aid boxes are available at the boiler station, mill workshop, mill loading ramp, nursery area, manuring activity, FFB harvesting activity, and loose fruits collection activity. Samples of first aid boxes were checked, and contents were found to be complete and in usable order. Workers trained in First Aid were present in the mill and field operations, as detailed below:</p> <ul style="list-style-type: none"> <li>• Pagoh POM: 9 employees attended First Aid &amp; Adult CPR Training, valid until 09/01/2025, and 3 employees attended Basic Occupational First Aid &amp; CPR Training, valid until 11/08/2026.</li> <li>• Lanadron Estate: 3 employees attended Basic First Aid and Cardiopulmonary Resuscitation, valid until 08/09/2026.</li> <li>• Pengkalan Bukit Estate: 3 employees attended Basic Occupational First Aid &amp; CPR Training, valid until 13/08/2026.</li> <li>• Pagoh Estate: 3 employees attended Basic First Aid and Cardiopulmonary Resuscitation, valid until 08/09/2026.</li> </ul>	Complied
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6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>An awareness and training program has been implemented, ensuring all workers are adequately trained in safe working practices. The objective is to ensure that all workers understand Safety Data Sheets (SDS), safe working practices, and the correct use of Personal Protective Equipment (PPE).</p> <p>Suitable PPE has been provided to workers based on the Hazard Identification, Risk Assessment, and Risk Control (HIRARC) established, information in the SDS, and recommendations from the Chemical Health Risk Assessment (CHRA) assessor. During site visits, it was verified that PPE was adequately implemented at various stations, including the Sterilizer Station, Press Station, loading ramp, oil room, boiler, manuring, harvesting, and spraying areas. Interviews with workers confirmed that PPE</p>	Complied

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		<p>is provided free of charge, and management does not charge for replacements. Workers can exchange damaged or expired PPE for new items, with all issuances recorded by management. The issuance records of PPE were verified during the audit.</p> <p>Used PPE is collected by management for disposal as scheduled waste, registered as SW410. Disposal records are as follows:</p> <ul style="list-style-type: none"> <li>• Pagoh POM: Latest disposal on 26/09/2024. Sighted Consignment Note No. 2024092616YS3NGJ with a quantity of 0.2681 MT. Inventory of Scheduled Wastes (File Ref. No. JAS.JMU.600-3/1/55) dated 30/09/2024 recorded the SW410 handling on 26/09/2024.</li> <li>• Lanadron Estate: Latest disposal on 01/10/2024. Sighted Consignment Note No. 2024100114QF0NUS with a quantity of 0.03 MT. Inventory of Scheduled Wastes (File Ref. No. JAS.JMU.600-3/4/127) dated 03/10/2024 recorded the SW410 handling on 01/10/2024.</li> <li>• Pengkalan Bukit Estate: Latest disposal on 01/10/2024. Sighted Consignment Note No. 2024100116IL4KOY with a quantity of 0.14 MT. Inventory of Scheduled Wastes (File Ref. No. JAS.JMU.600-3/4/127) dated 03/10/2024 recorded the SW410 handling on 01/10/2024.</li> <li>• Pagoh Estate: Latest disposal on 08/10/2024. Sighted Consignment Note No. 2024100816HATJ42 with a quantity of 0.0785 MT.</li> </ul> <p>Management provides adequate shower rooms and soap for employees to use after activities involving chemical application. Lockers are also provided for employees to store clean clothes for their journey home. To ensure no PPE is taken home, management has provided areas for washing and storing PPE.</p>	
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.	Medical care and accident insurance are provided to all employees, both local and foreign, under the Employees' Social Security Act 1969 (Act 4). The monthly payments made to SOCSO on Form 8A for both foreign and local employees at the POM and all estates were available for review.	Complied

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	- Minor compliance -		
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>SOP of incident, accidents &amp; non-conformance management dated 30/05/2019 as guidance and mechanism. Occupational injuries are recorded using Lost Time Accident (LTA) metrics via monthly data of estate/mill safety performance via Rapid 4 System.</p> <p>Additionally, in accordance with the Occupational Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning, and Occupational Disease) Regulations 2004 [NADOPOD], which fall under the purview of the Occupational Safety and Health Act of 1994 (Act 514), it is mandatory for the UoC to submit the JKPP 8 form to the Department of Occupational Safety and Health (JKKP) before January 31st each year.</p> <p>The verification process confirmed that the JKPP 8 reports for each Operating Unit were duly submitted to JKPP in January 2024 for the year 2023 report through the MyKKP portal.</p>	Complied
<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>			
<b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	<p>The IPM Management Plan established through the Environment Management Plan dated 27/09/2024 at Lanadron Estate, among the plan is to maintain progressive planting of <i>tunera subulate</i>, <i>cassia cobanensis</i> and <i>antigonon</i> at immature area and immature area.</p> <p>The training on IPM was conducted on 23/02/2024 for Barn Owl Box monitoring, and 24/01/2024 for rat baiting.</p> <p>The management has recorded the census conducted as per sighted dated 03/08/2024 for beneficial plant maintenance, and barn owl box census in August 2024 at Lanadron Estate</p> <p>IPM Training conducted at Pagoh Estate on 04/03/2024</p> <p>Census for Barn Owl Box conducted at Pagoh Estate on February 2024 and August 2024.</p>	Complied

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7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	None of the plant species mentioned, which are referenced in the Global Invasive Species Database and CABI.org, are utilized in their IPM management. In SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC), three plant species were employed for IPM, including <i>Tunera subulata</i> , <i>Cassia cobanensis</i> , and <i>Antigonon leptopus</i> .	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There is no evidence or records indicating the use of fire for pest control at any of the estates visited. This practice is explicitly addressed in the SD Guthrie Berhad Group Sustainability and Quality Policy Statement, signed by the Group Managing Director on 02/12/2019, supported by SDP Responsible Agriculture Charter under section 3.2: Protect and enhance forest. The policy states:  "We will seek to protect and enhance forest and wildlife, and minimise carbon emissions from land use change through:  Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as protective firefighting measures in and around our operation."	Complied
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad). Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01/07/2011. Selected products are specific to the target pest, weed and disease. Among pesticide listed in the procedure are <i>Acephate</i> , <i>Cypermethrin</i> , <i>2,4-D Methyl Amine</i> , <i>Glufosinate Ammonium</i> , <i>Glyphosate Isopropylamine</i> , <i>Indaziflam</i> , <i>Metsulfuron Methyl</i> , <i>Sodium Chlorate</i> , <i>Triclopyr Butotyl</i> , <i>Propineb</i> , <i>Thiram</i> , <i>Flucoumafen</i> , <i>Walfarin</i> , etc.	Complied

7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides used (including active ingredients used and their LD 50, area treated, amount of a.i applied per ha and number of applications) is maintained by the estate and submitted to the Head Quarters on a monthly basis. Among the pesticides recorded for the period of Dec 2022 – Nov 2023 are <i>Acephate, Cypermethrin, 2,4-D Methyl Amine, Glufosinate Ammonium, Glyphosate Isopropylamine, Indaziflam, Metsulfuron Methyl, Sodium Chlorate, Triclopyr Butotyl, Propineb, Thiram, Flucoumafen, Walfarin, MSMA, Diuron, and Malathion.</i></p> <p>Upon examination of the records meticulously maintained by each estate, it has been verified that the recorded pesticides align accurately and correspond with the information documented in both the store card records and the Chemical Register.</p>	Complied
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have a policy to systematically minimize the use of pesticides in accordance with the Integrated Pest Management (IPM) plan. The estates continue to implement cultural and biological controls for oil palm pests, such as leaf-eating pests and rats. IPM techniques applied include monitoring pest numbers and using triggers to initiate control measures.</p> <p>Although there have been no outbreaks of leaf-eating pests, beneficial plants are being established along main roads and block boundaries to attract natural predators. The estates have established an IPM program, which is reviewed annually. The IPM program includes planting beneficial plants, conducting rat damage censuses, and performing Ganoderma censuses. The pesticide reduction program is monitored on a per-hectare basis.</p> <p>All estates in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) continue to minimize the use of agrochemicals by implementing IPM plans. Blanket spraying is not practiced, and soft grasses are maintained in the field. Pesticides are used only after a threshold level has been exceeded, as per the Agricultural Reference Manual (ARM) Section 15 - Plant Protection. As part of the IPM plans, management of all estates has</p>	Complied



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		<p>established nurseries for nectariferous beneficial plants (<i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, and <i>Turnera subulata</i>) for continuous planting to attract natural predators and reduce insecticide use. During the visit, it was observed that a number of beneficial plants had been planted, and all four estates had plants ready for planting in the nurseries.</p> <p>Prophylactic use of pesticides, as identified in national best practice guidelines, is employed in replanting areas and oil palm nurseries. In immature oil palm areas, prophylactic spraying with diluted cypermethrin is carried out against <i>Rhinoceros</i> beetles as per SOP. To reduce the use of rat baits, Barn Owls are encouraged, as indicated by Barn Owl census records. Barn Owl boxes were sighted in the fields, and the estates aim to establish more boxes to achieve a ratio of one box per ten hectares.</p>	
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	Based on the site visit, records review, and interview with chemical handlers, it verified that there was no prophylactic use of pesticides at the estates.	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> <li>Judgment of the threat and verify why this is a major threat</li> <li>Why there is no other alternative which can be used</li> <li>Which process was applied to verify why there is no other less hazardous alternative</li> <li>What is the process to limit the negative impacts of the application</li> </ol>	Based on documentation reviews (chemical usage records, chemical register, justification of pesticides, chemical bin cards, chemical stock purchase), site visits, and interview with relevant personnel (storekeeper, workers, etc.), it was noted that each estate of SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) had not use pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and <i>paraquat</i> . Except for <i>2,4-D-Dimethylammonium</i> and <i>Cypermethrin</i> which were Class II chemicals, all others were of Class III & IV. Use of <i>paraquat</i> had been eliminated in accordance with SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) policy and was replaced by a contact or systemic herbicide e.g., <i>Glyphosate Isopropylammonium</i> , <i>Triclopyr-Butotyl</i> , <i>2,4-D-Dimethylammonium</i> , <i>Indaziflam</i> , <i>Monosodium Methanearsonate (MSMA)</i> , <i>Gufosinate Ammonium</i> , <i>Metsulfuron-Methyl</i> , <i>Sodium Chlorate</i> , etc. <i>Monocrotophos</i> was eliminated and in its place, <i>Acephate</i> is used. Hence,	Complied

	<p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>	<p>the need for a judgement of the threat and verification as to it being a major threat does not apply in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC).</p>	
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant. Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms. Reviewed the training records as per criteria 3.7.2. Sampled the training conducted for pesticide handlers as below: -</p> <p>(1) Pagoh Mill: PPE (11/03/2024); Chemical Handling (06/09/2024); e-SIME+ (22/03/2024); SW Management (03/10/2024);</p> <p>(2) Lanadron Estate: HCV Refresher Training (02/10/2024); Chemical Spillage (22/08/2024); Scheduled Wastes Management (15/08/2024); Bagworm &amp; Trunk Injection (03/07/2024)</p> <p>(3) Pengkalan Bukit Estate: SW Management (02/10/2024; Chemical Handling (02/10/2024)</p> <p>(4) Pagoh Estate: Chemical Safety Awareness (04/10/2024); Chemical &amp; Spraying SOP (21/09/2024); Trunk Injection SOP (21/09/2024); HCV Awareness (11/09/2024); Manuring SOP (21/09/2024)</p> <p>Evaluation of understanding was done, and this was confirmed during on-site interviews with the relevant POM and estates personnel.</p>	Complied
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the storekeeper was seen to unlock the padlock to open entrance door for auditor to inspect the store.</p>	Complied

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		At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.	
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>At each Operating Unit, used pesticide containers are handled according to the procedure SD/SDP/GSD (formerly known as PSQM) (ESH)/203-EN1 – Scheduled Wastes (Hazardous Waste) Management. This procedure requires that containers be triple rinsed and punctured before disposal. If containers are reused for other purposes, they are labelled with a skull and crossbones to indicate their previous contents.</p> <p>During site visits, it was evident that reused containers were appropriately labelled with a skull and crossbones. At the Scheduled Waste (SW) store, used pesticide containers were observed to be triple rinsed and punctured before disposal. Details of disposal are as follows:</p> <ul style="list-style-type: none"> <li>• Lanadron Estate: Disposed of as SW409. The latest disposal was on 01/10/2024 with a quantity of 0.0175 MT. Consignment Note No. 2024100114S7XFZE was sighted. The Inventory of Scheduled Wastes (File Ref. No. JAS.JMU.600-3/4/127) dated 03/10/2024 recorded the handling of SW409 on 01/10/2024.</li> <li>• Pengkalan Bukit Estate: Disposed of as SW409. The latest disposal was on 01/10/2024 with a quantity of 0.1855 MT. Consignment Note No. 20241001167NZFIU was sighted.</li> <li>• Pagoh Estate: Disposed of through a DOE-approved recycling center. The latest disposal as recyclable materials was on 29/07/2024. Purchase Note No. 2590 dated 29/07/2024 was sighted.</li> </ul>	Complied

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		Therefore, it is verified that all pesticide containers are triple rinsed and punctured before disposal and/or handled responsibly if reused for other purposes.	
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	Based on documentation reviews (chemical usage records, chemical register, justification of pesticides, chemical bin cards, chemical stock purchase), site visits, and interview with relevant personnel (storekeeper, workers, etc.), it was noted that each estate of the UoC had not practicing the aerial spraying.	Complied
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Chemical handlers for each operating unit of SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) were examined under the Medical Surveillance Programme due to their exposure to hazardous chemicals, as stipulated in the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 under the Occupational Safety &amp; Health Act (OSHA) 1994. Records show that workers handling chemicals were sent for medical surveillance:</p> <ul style="list-style-type: none"> <li>• Pagoh POM: Conducted by HQ/21/DOC/00/00740 in April 2024. Ten workshop workers were exposed to manganese and chromium, and two mill laboratory workers were exposed to potassium chromate and hexane. All were declared fit to work.</li> <li>• Lanadron Estate: Conducted by HQ/21/DOC/00/00740 on 22/07/2024. Twenty pesticide handlers and two workshop attendants were examined. All were declared fit to work.</li> <li>• Pengkalan Bukit Estate: Conducted by HQ/21/DOC/00/00740 on 22/07/2024. Thirty-eight pesticide handlers and two workshop attendants were examined. Thirty-nine were declared fit to work, and one was placed under</li> </ul>	Complied

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		<p>Medical Removal Protection due to high chromium levels in urine. The Medical Removal Protection Report (USECHH 5i) issued by the Occupational Health Doctor (OHD) on 26/08/2024 stated that the worker should not continue to work as a welder in the workshop for one month (26/08/2024 – 26/09/2024), subject to review. On 26/09/2024, the worker was re-examined, and the OHD report dated 07/10/2024 confirmed that biological monitoring had returned to normal levels, with no signs of chromium toxicity. The worker was declared fit to work.</p> <ul style="list-style-type: none"> <li>• Pagoh Estate: Conducted by HQ/21/DOC/00/00740 on 17-18/07/2024. Twenty-three pesticide handlers and two workshop attendants were examined. All were declared fit to work.</li> </ul> <p>No abnormalities were reported by the Occupational Health Doctor (OHD). The medical reports indicated no cases of low blood cholinesterase levels. Any worker with such a condition would be declared unfit for work with pesticides, but no such cases were found in the UoC as of the audit date. In addition to annual medical surveillance, monthly clinical checks (gastrointestinal, urinary system, pregnancy) were also conducted by the Medical Health Officer/Assistant on the chemical handlers. Medical surveillance records and monthly health check records (conducted at clinics) were available and satisfactorily maintained. Interviews with chemical handlers during field visits confirmed that they did not exhibit any symptoms of toxic reactions such as skin disorders, rashes, mouth and throat pain, breathing difficulties, or nail problems.</p>	
7.2.11	<b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	As per verification, based on the new mother that has been identified, none of them are handling chemicals. There is evidence that once they have been identified as pregnant, the management will directly change them for	Complied

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	<p>- Critical (Major) compliance -</p>	<p>other types of workers which not related to chemical. It has been further confirmed through interview with sample female workers and site visit.</p> <p>For the people that have medical restrictions, the UoC is complying with the Part X (Medical Removal Protection) – Regulation 28. Medical removal protection of Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000, which states:</p> <ul style="list-style-type: none"> <li>iii. The employer shall not permit an employee to be engaged in and shall remove him from any work that exposes or likely to expose him to chemicals hazardous to health on each occasion that the medical finding, determination or opinion expressed by an occupational safety and health officer who is also a medical practitioner or by an occupational health doctor shows that the employee has a detected medical condition which places him at increased risk of material impairment to health from exposure to chemicals hazardous to health.</li> <li>iv. The employer, after being notified by an occupational safety and health officer who is also a medical practitioner or an occupational health doctor of the fact, shall not permit a pregnant employee or breastfeeding employee to be engaged in, and shall remove the employee from work which may expose or is likely to expose the employee to chemicals hazardous to health.</li> <li>v. The employer shall return an employee to his former job - <ul style="list-style-type: none"> <li>(a) for an employee removed in accordance with subregulation (1), when a subsequent medical determination results in a medical finding, determination or opinion which shows that the employee no longer has the detected medical condition; or</li> <li>(b) for an employee removed in accordance with subregulation (2), at the appropriate time where the employee is no longer pregnant or breastfeeding a child.</li> </ul> </li> </ul>	
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		<p>vi. For the purpose of this regulation, "medical practitioner" means a medical practitioner registered under the Medical Act 1971 [Act 50].</p> <p>Following the guidance outlined in the CHRA report, employees involved in tasks related to chemicals are required to undergo annual medical surveillance. If there a case where a worker indicates he/she is "Not Fit To Work," the OHD will then suggest "Medical Removal" for that particular individual.</p> <p>However, based on the latest results from medical surveillance, it has been determined that all employees are fit to work. Therefore, the OHD has not made any recommendations for "Medical Removal" based on the current assessments.</p>	
<b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Addressed in the Waste Management Procedure for Estates &amp; Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01, waste management is categorized as follows:</p> <ol style="list-style-type: none"> <li>1. Scheduled Waste</li> <li>2. Hazardous Waste</li> <li>3. Non-Hazardous Waste</li> <li>4. Industrial Waste</li> <li>5. Construction Waste</li> <li>6. Agricultural Waste</li> <li>7. Office Waste</li> <li>8. General Waste</li> </ol>	Complied
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 procedure for managing scheduled waste has been established, as outlined in the Waste Management Procedure for Estates &amp; Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01. Additional</p>	Complied

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		<p>reference was made to the Guidelines for Packaging, Labelling, and Storage of Scheduled Wastes in Malaysia.</p> <p>Awareness training on scheduled waste management has been conducted on the following dates:</p> <p>Lanadron Estate: 23/04/2024</p> <p>Pengkalan Bukit Estate: 02/10/2024</p> <p>Pagoh Palm Oil Mill: 31/05/2024</p> <p>Pagoh Estate: 03/10/2024</p> <p>Interviews with the person in charge and workers revealed that they have a good awareness of scheduled waste management practices.</p> <p>Record of Inventory of Schedule Waste and Disposal Record as per details below:</p> <p><u>Lanadron Estate</u></p> <p>Inventory</p> <ul style="list-style-type: none"> <li>• File reference Number: JAS.JMU.600-3/4/127</li> <li>• Date Reporting: 03/10/2024</li> <li>• Waste Generated: SW409, SW410.</li> </ul> <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 2024073016TFB9DH</li> <li>• Date Disposal: 30/07/2024</li> <li>• SW409 – 0.017 MT by PXXXX FXXX (Melaka) Sdn Bhd.</li> </ul> <p>Sample 2</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 2024073016I2RCDO</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Date Disposal: 30/07/2024</li> <li>• SW410 – 0.227 MT by PXXXX FXXX (Melaka) Sdn Bhd.</li> </ul> <p><u>Pengkalan Bukit Estate</u></p> <p>Inventory</p> <ul style="list-style-type: none"> <li>• File reference Number: JAS.JMU.600-3/4/78</li> <li>• Date Reporting: 03/10/2024</li> <li>• Waste Generated: SW305, SW409, SW410.</li> </ul> <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 20240731106DWTP2</li> <li>• Date Disposal: 31/07/2024</li> <li>• SW410 – 0.5315 MT by PXXXX FXXX (Melaka) Sdn Bhd</li> </ul> <p>Sample 2</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 2024073110DLQ2W</li> <li>• Date Disposal: 31/07/2024</li> <li>• SW305 – 0.4535 MT by PXXXX FXXX (Melaka) Sdn Bhd</li> </ul> <p><u>Pagoh Palm Oil Mill</u></p> <p>Inventory</p> <ul style="list-style-type: none"> <li>• File reference Number: JAS.JMU.600-3/1/55</li> <li>• Date Reporting: 30/09/2024</li> <li>• Waste Generated: SW322, SW409, SWSW324</li> </ul> <p>Disposal</p> <p>Sample 1</p>	
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		<ul style="list-style-type: none"> <li>Disposal consignment note: 2024092615D6VTXC</li> <li>Date Disposal: 26/09/2024</li> <li>SW102 – Batteries: 0.0374 MT by KXXXXX AXXX Sdn Bhd</li> </ul> <p>Sample 2</p> <ul style="list-style-type: none"> <li>Disposal consignment note: 20240926160KECB9</li> <li>Date Disposal: 26/09/2024</li> <li>SW109 – Waste containing mercury or its compound – 0.0224 MT by KXXXXX AXXX Sdn Bhd</li> </ul> <p><u>Pagoh Estate</u> Inventory</p> <ul style="list-style-type: none"> <li>File reference Number: JAS.JMU.600-3/4/128</li> <li>Date Reporting: 08/10/2024</li> <li>Waste Generated: SW</li> </ul> <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> <li>Disposal consignment note: 2024080111APU3OG</li> <li>Date Disposal: 01/08/2024</li> </ul> <p>SW410: 0.038 MT by PXXXX FXXX (Melaka) Sdn Bhd</p> <p>Sample 2</p> <ul style="list-style-type: none"> <li>Disposal consignment note: 20240801100RXWBE</li> <li>Date Disposal: 01/08/2024</li> </ul> <p>SW305: 0.0985 MT by PXXXX FXXX (Melaka) Sdn Bhd</p>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	During visits to all estates, no evidence was found of fire being used for waste disposal.	Complied

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		<p>Lanadron Estate / Pengkalan Bukit Estate / Pagoh Estate / Pagoh</p> <p>Domestic waste was disposed through the contractor appointed to transport the domestic waste. Sighted the Purchase Order, Delivery Order and Tax Invoice from MTXX Enterxxxx dated 30/09/2024 for the rubbish collection. Verified that the contractor is license to transport the domestic waste with reference number (JPSPN2022/000696) Valid until 08/02/2029.</p>	
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
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>SOU 19 – Pagoh Palm Oil Mill UoC continues to use and implement Standard Operating Procedures (SOP) for each process. Brief versions of the SOPs are displayed at appropriate locations, and copies of the documented SOPs were presented to the audit team. It was observed that activities involving safety, health, environmental, quality, and employee matters followed the established SOPs.</p> <p>The key manuals and SOPs include:</p> <ul style="list-style-type: none"> <li>• Agriculture Reference Manual (ARM) dated 01/07/2011</li> <li>• Estate Quality Management System (EQMS) Manual dated 01/11/2008</li> <li>• Safety Standard Operating Procedures (SSOP) dated 10/06/2023</li> <li>• Sustainable Plantation Management System Manual (SPMS)</li> <li>• Riparian Reserves Management, by Conservation &amp; Biodiversity Unit (CBU), Group Sustainability, June 2021</li> <li>• Occupational Safety and Health Manual dated 01/01/2021</li> <li>• Pictorial Safety Standards and Security Guidelines (PSS)</li> <li>• Plantations/Mill Quality Management System (PQMS/MQMS) Standard Operating Manual</li> </ul> <p>All estate and mill operations are guided by these manuals and SOPs. The procedures documented in the Agriculture Reference Manual are disseminated to staff and workers through morning briefings and training</p>	Complied

		<p>sessions. The manuals are kept in the main office for employee reference, particularly for supervisory personnel. The ARM includes all operations in the estates, from seedlings in the nursery to planting young palms, plantation upkeep, mill FFB receipt, grading, processing, quality analysis, and security.</p> <p>Site inspections and interviews with workers confirmed that the SOPs are implemented and understood. The core principle of these SOPs, as outlined in the Responsible Agricultural Charter, is the care for safety, health, and the environment.</p>													
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>Periodic tissue and soil sampling were conducted in the estates to monitor changes in nutrient status, forming the basis for fertilizer input recommendations. Soil analysis provided indications of soil health and monitored changes in organic carbon and total nitrogen levels. For all four estates, agronomic assessments and fertilizer recommendations were conducted by the Sime Darby Research Plant Nutrition &amp; Protection Unit (PNP) Southern Region to formulate the 2023 manuring program and suggest relevant agronomic practices for improving oil palm yield and growth.</p> <p>Annual foliar sampling for ash, nitrogen (N), phosphorus (P), potassium (K), magnesium (Mg), calcium (Ca), and boron (B) was carried out in all estates. The latest reports are as follows:</p> <table><tr><td>Estate</td><td>Report Date</td><td>Report No</td></tr><tr><td>Pagoh Estate</td><td>05/09/2023</td><td>P335/2023</td></tr><tr><td>Lanadron Estate</td><td>07/04/2023</td><td>P103/2023</td></tr><tr><td>Pg Bukit Estate</td><td>17/01/2024</td><td>P27/2024</td></tr></table> <p>Soil analysis for pH, organic carbon (Org C), total nitrogen (Total N), total phosphorus (Total P), available phosphorus (Avail P), exchangeable</p>	Estate	Report Date	Report No	Pagoh Estate	05/09/2023	P335/2023	Lanadron Estate	07/04/2023	P103/2023	Pg Bukit Estate	17/01/2024	P27/2024	Complied
Estate	Report Date	Report No													
Pagoh Estate	05/09/2023	P335/2023													
Lanadron Estate	07/04/2023	P103/2023													
Pg Bukit Estate	17/01/2024	P27/2024													

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		<p>potassium (Exch K), exchangeable calcium (Exch Ca), and exchangeable magnesium (Exch Mg) is conducted on a five-year cycle. The latest reports are as follows:</p> <table><tr><td>Estate</td><td>Report Date</td><td>Report No</td></tr><tr><td>Pagoh Estate</td><td>28/08/2023</td><td>S10/2024</td></tr><tr><td>Lanadron Estate</td><td>28/02/2022</td><td>S23/2022</td></tr><tr><td>Pg Bukit Estate</td><td>21/03/2022</td><td>S18/2022</td></tr></table> <p>All foliar and soil sampling and analysis were conducted by the Sime Darby Research Plant Nutrition &amp; Protection Unit (PNP) Central West Region.</p>	Estate	Report Date	Report No	Pagoh Estate	28/08/2023	S10/2024	Lanadron Estate	28/02/2022	S23/2022	Pg Bukit Estate	21/03/2022	S18/2022	
Estate	Report Date	Report No													
Pagoh Estate	28/08/2023	S10/2024													
Lanadron Estate	28/02/2022	S23/2022													
Pg Bukit Estate	21/03/2022	S18/2022													
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The agronomist of the research centre will recommend the EFB Application (rate &amp; area). Usually, area that will be applied with EFB is a low-yield area. EFB mulching had been carried out in mature area along the inter-row, and around the circle in the immature palms.</p> <p>EFB Mulching Application and field maps indicate the amounts and locations of EFB application in the estates. Records of EFB delivery, mulching quantities, and field locations were well maintained. Sighted application record at Pengkalan Bukit Estate with latest application was in June 2024 with 26.95 MT of EFB at field 2011B.</p>	Complied												
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The fertilizer application program was monitored using records such as program sheets, bin cards, field cost books, and Fertilizer Application Monitoring forms. Auditors reviewed these records and found that the actual fertilizers applied in 2024 were in line with the program. The following fertilizers were applied in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) estates, based on recommendations by the Agronomist:</p> <p><u>Lanadron Estate:</u></p>	Complied												

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		<p>Fertilizer requirement for 2024 (Amendment II), updated on 04/10/2024, reflecting usage up until September 2024:</p> <ul style="list-style-type: none"><li>• Borate (48% of B2O5): 11,000 kg</li><li>• Rock Phosphate (28% of P2O5): 417,000 kg</li><li>• NKC2 Compact: 1,174,600 kg</li><li>• Kieserite (27% of MgO): 191,800 kg</li></ul> <p><u>Pengkalan Bukit Estate:</u></p> <ul style="list-style-type: none"><li>• Rock Phosphate (RP): 559.80 MT</li><li>• NKC1 Compact: 1,104.65 MT + 471.95 MT</li><li>• Borate: 9.58 MT</li><li>• Kieserite: 438.55 MT</li></ul>																															
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.																																	
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows:</p> <table><tr><td>Pagoh Estate</td><td>Lanadron Estate</td><td>Pengkalan Bukit Estate</td></tr><tr><td>Bkt Temiang</td><td>Briah</td><td>Holyrood</td></tr><tr><td>Holyrood</td><td>Selangor</td><td>Local Alluvium</td></tr><tr><td>Jitra</td><td>Jawa</td><td>Malacca</td></tr><tr><td>Kelau</td><td>Sogomana</td><td>Munchong</td></tr><tr><td>Lanchang</td><td>–</td><td>Munchong shallow</td></tr><tr><td>Masai</td><td>–</td><td>Prang</td></tr><tr><td>Pelepah</td><td>–</td><td>Prang Shallow</td></tr><tr><td>Rengam</td><td>–</td><td>Rengam</td></tr><tr><td>Tawar</td><td>–</td><td>–</td></tr></table>	Pagoh Estate	Lanadron Estate	Pengkalan Bukit Estate	Bkt Temiang	Briah	Holyrood	Holyrood	Selangor	Local Alluvium	Jitra	Jawa	Malacca	Kelau	Sogomana	Munchong	Lanchang	–	Munchong shallow	Masai	–	Prang	Pelepah	–	Prang Shallow	Rengam	–	Rengam	Tawar	–	–	Complied
Pagoh Estate	Lanadron Estate	Pengkalan Bukit Estate																															
Bkt Temiang	Briah	Holyrood																															
Holyrood	Selangor	Local Alluvium																															
Jitra	Jawa	Malacca																															
Kelau	Sogomana	Munchong																															
Lanchang	–	Munchong shallow																															
Masai	–	Prang																															
Pelepah	–	Prang Shallow																															
Rengam	–	Rengam																															
Tawar	–	–																															

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		<table><tr><td>Tebuk</td><td>–</td><td>–</td></tr><tr><td>Local Alluvium</td><td>–</td><td>–</td></tr><tr><td>Organic Clay</td><td>–</td><td>–</td></tr></table> <p>The Soil Series Map were issued by the R&amp;D - TTAS – Precision Agriculture Unit dated March 2022 &amp; Nov 2015.</p>	Tebuk	–	–	Local Alluvium	–	–	Organic Clay	–	–	
Tebuk	–	–										
Local Alluvium	–	–										
Organic Clay	–	–										
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>The estates visited in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) followed a management strategy to control soil erosion and degradation on slopes, similar to other SD Guthrie Estates. Planting on slopes between 9 and 25 degrees adhered to guidelines from the Reclassification of Conservation Set Aside (CSA) and the ARM Manual for terrace construction. Various erosion control measures were in place, including proper frond stacking, EFB mulch application, terrace building, road maintenance, and soft vegetation cover. Cover crops such as mucuna bracteata were planted on some slopes, and neprolepis biserrata was seen between rows.</p> <p>Slope distribution across the estates showed that in Pagoh Estate, 18.24% of the land had slopes between 0 and 2 degrees, Lanadron Estate had 67.96%, and Pengkalan Bukit Estate had 17.01%. For slopes between 2 and 6 degrees, Pagoh Estate covered 57.65%, Lanadron Estate 29.54%, and Pengkalan Bukit Estate 54.49%. Slopes ranging from 6 to 12 degrees were 22.26% in Pagoh, 2.49% in Lanadron, and 26.02% in Pengkalan Bukit. Slopes between 12 and 20 degrees were 1.74% in Pagoh, 0.01% in Lanadron, and 2.37% in Pengkalan Bukit. Slopes between 20 and 25 degrees made up 0.07% in Pagoh, 0.00% in Lanadron, and 0.11% in Pengkalan Bukit, while slopes over 25 degrees were only 0.04% in Pagoh, with none in Lanadron or Pengkalan Bukit.</p>	Complied									
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No new planting conducted at all estates visited as verified and sighted during site visit.</p>	Complied									

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<b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.																			
7.6.1	<p><b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series and topography maps were reviewed at the sampled estates, showing that there was no categorization of fragile soils within these areas. During the planning phase for replanting, factors such as land terrain, drainage, and road systems were taken into consideration. The identified soil series for each estate are summarized below, along with descriptions of soil characteristics such as texture, depth, drainage, parent material, and key management aspects.</p> <p>In Pagoh Estate, the soil series include Bukit Temiang, Holyrood, Jitra, Kelau, Lanchang, Masai, Pelepah, Rengam, Tawar, Tebuk, Local Alluvium, and Organic Clay. In Lanadron Estate, the soil series consist of Briah, Selangor, Jawa, and Sogomana. There are additional empty entries for the other soil types. In Pengkalan Bukit Estate, the soil series are Holyrood, Local Alluvium, Malacca, Munchong, Munchong (Shallow), Prang, and Prang (Shallow), with several entries remaining unfilled.</p> <p>The information regarding the soil series will aid in effective management practices.</p>	Complied																
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Soil series and topography maps were available for the sampled estates, and no fragile soil was categorized within these estates. In planning for replanting, the estate considered factors such as land terrain, drainage, and road systems.</p>	Complied																
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>The Agronomy Advisory and Services Department carried out assessments and supplied the estates with topography maps. Below are the sampled topography details observed at the estates</p> <table border="1"> <thead> <tr> <th>No</th><th>Topography</th><th>Pagoh</th><th>Lanadron</th><th>Pg Bukit</th></tr> </thead> <tbody> <tr> <td>1</td><td>0-2</td><td>18.24</td><td>67.96</td><td>17.01</td></tr> <tr> <td>2</td><td>2-6</td><td>57.65</td><td>29.54</td><td>54.49</td></tr> </tbody> </table>	No	Topography	Pagoh	Lanadron	Pg Bukit	1	0-2	18.24	67.96	17.01	2	2-6	57.65	29.54	54.49	Complied	
No	Topography	Pagoh	Lanadron	Pg Bukit															
1	0-2	18.24	67.96	17.01															
2	2-6	57.65	29.54	54.49															



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		<table><tr><td>3</td><td>6-12</td><td>22.26</td><td>2.49</td><td>26.02</td></tr><tr><td>4</td><td>12-20</td><td>1.74</td><td>0.01</td><td>2.37</td></tr><tr><td>5</td><td>20-25</td><td>0.07</td><td>0.00</td><td>0.11</td></tr><tr><td>6</td><td>&gt;25</td><td>0.04</td><td>0.00</td><td>0.00</td></tr><tr><td></td><td>Total</td><td>100%</td><td>100%</td><td>100%</td></tr></table>	3	6-12	22.26	2.49	26.02	4	12-20	1.74	0.01	2.37	5	20-25	0.07	0.00	0.11	6	>25	0.04	0.00	0.00		Total	100%	100%	100%	
3	6-12	22.26	2.49	26.02																								
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6	>25	0.04	0.00	0.00																								
	Total	100%	100%	100%																								
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.																												
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Verification on soil maps, site visit, interview and through online data check on peat soil through <a href="#">GlobalForestWatch</a> that there are no peat land in the all estate visited in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC), thus this indicator 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. <b>PROCEDURAL NOTE:</b> 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 -	Verification on soil maps, site visit, interview and through online data check on peat soil through <a href="#">GlobalForestWatch</a> that there are no peat land in the all estate visited in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC), thus this indicator is not applicable			Not Applicable																							
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Verification on soil maps, site visit, interview and through online data check on peat soil through <a href="#">GlobalForestWatch</a> that there are no peat land in the all estate visited in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC), thus this indicator is not applicable			Not Applicable																							
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Verification on soil maps, site visit, interview and through online data check on peat soil through <a href="#">GlobalForestWatch</a> that there are no peat land in the all estate visited in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC), thus this indicator is not applicable			Not Applicable																							

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7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	Verification on soil maps, site visit, interview and through online data check on peat soil through <a href="#">GlobalForestWatch</a> that there are no peat land in the all estate visited in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC), thus this indicator is not applicable	Not Applicable
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Verification on soil maps, site visit, interview and through online data check on peat soil through <a href="#">GlobalForestWatch</a> that there are no peat land in the all estate visited in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC), thus this indicator is not applicable	Not Applicable
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p>	Verification on soil maps, site visit, interview and through online data check on peat soil through <a href="#">GlobalForestWatch</a> that there are no peat land in the all estate visited in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC), thus this indicator is not applicable.	Not Applicable

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	- Critical (Major) compliance -																				
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.																					
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>A water management plan has been established at SD Guthrie SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC), with the plan being reviewed annually. The latest plan covers FY2023 and FY2024, with the following objectives and action plan details:</p> <p><u>Lanadron Estate</u></p> <table><tr><th>Objective</th><th>Category</th><th>Action Plan</th></tr><tr><td rowspan="2">Protection of watercourse and wetland</td><td rowspan="2">River stream</td><td>To monitor the water quality by sending water analysis by R&amp;D</td></tr><tr><td>To do investigation for off spec parameters in the water sampling result</td></tr><tr><td rowspan="3">Water consumption &amp; Contingency Plan during water shortage, Dry spell or severe water pollution</td><td rowspan="3">Water consumption</td><td>To purchase water from vendor / sister estates</td></tr><tr><td>Consumption of natural water for operation use</td></tr><tr><td>To renew licence for abstracting of water bodies (BKSA)</td></tr><tr><td></td><td>Daily consumption</td><td>Recording of monthly water Consumption from SAMB</td></tr></table> <p><u>Pengkalan Bukit Estate</u></p> <table><tr><th>Objective</th><th>Category</th><th>Action Plan</th></tr></table>	Objective	Category	Action Plan	Protection of watercourse and wetland	River stream	To monitor the water quality by sending water analysis by R&D	To do investigation for off spec parameters in the water sampling result	Water consumption & Contingency Plan during water shortage, Dry spell or severe water pollution	Water consumption	To purchase water from vendor / sister estates	Consumption of natural water for operation use	To renew licence for abstracting of water bodies (BKSA)		Daily consumption	Recording of monthly water Consumption from SAMB	Objective	Category	Action Plan	Non-compliance
Objective	Category	Action Plan																			
Protection of watercourse and wetland	River stream	To monitor the water quality by sending water analysis by R&D																			
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Objective	Category	Action Plan																			

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		Protection of watercourse and wetland	Water Catchment	No chemical handling nor operation nearby water catchment area – erection of warning signages		
				Sent water sampling to R&D		
		Water consumption & Contingency Plan during water shortage, Dry spell or severe water pollution	Water consumption	To purchase water from vendor / sister estates		
				Consumption of natural water for operation use		
				To renew licence for abstracting of water bodies (SPAN/BAKAJ)		
			Daily consumption	Recording of monthly water Consumption from SAJ To do water sampling every month for own water treatment facility.		
		<u>Pagoh Palm Oil Mill</u>				
		Objective	Category	Action Plan		
		Protection of watercourse and wetland	Water sampling as per Compliance Schedule	Monitor the water quality by sending water sampling for analysis R&D or Envilab Monitor water quality effectively, follow the procedure CPAR BOD Increase retention time for anaerobic pond no 1 pH Add PD Salt (Sodium Chloride) for pH Stabilization		

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				Resampling - After implementing corrective action		
		Water consumption & Contingency Plan during water shortage, Dry spell or severe water pollution	Water consumption	To record water usage level to be capped at volume permitted		
				Renew license from water bodies (BAKAJ)		
		<u>Pagoh Estate</u>				
		Objective	Category	Action Plan		
		Protection of watercourse and wetland	Water sampling as per Compliance Schedule	No Chemical Handling activities nearby water catchment area Erection of Warning Signages		
		Water consumption & Contingency Plan during	Water consumption	Recording of monthly water consumption		
				Reusing of monthly water consumption		

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		<p>water shortage, Dry spell or severe water pollution</p>			
		<p>This plan aims to ensure efficient water management and conservation across the estates, addressing both quality and quantity concerns while promoting sustainable practices.</p> <p>The workers of all estate visited were supplied with the clean water accordingly as all estates were supplied with government water facilities (SAJ) except the Pagoh Division at Pengkalan Bukit Estate which is having its own water treatment. Verified that the management has submitted the water quality test, and it is found to be in order.</p> <p>Based on the documentation review, it is verified that the plan requires management to monitor water consumption. However, the water abstraction monitoring at Pagoh Division – Pengkalan Bukit Estate is ineffective due to the absence of installed monitoring tools.</p> <p>Based on the records review, it is verified that Pengkalan Bukit Estate management conducts monthly water testing, with results consistently meeting the National Water Quality Standards set by the Ministry of Health (MOH). However, the established Water Management Plan does not include the activity of submitting these results to SPAN. Thus, the minor NC is raised</p>			
7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence</p>	<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. Riparian buffer zones have been identified and demarcated. Signage has been placed. No chemicals and fertilizer application observed been used in their maintenance. In some areas Guatemala grass were planted along the riverbanks. Management of</p>			Complied

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	<p>of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>riparian zone is guided by Riparian Reserves Management, by Conservation &amp; Biodiversity Unit (CBU), Group Sustainability, June 2021. The widths of the buffer zones are guided by the following measurements:</p> <table><tr><th>River width (meter)</th><th>Minimum width for river reserve (m) for peninsular Malaysia and Sarawak</th></tr><tr><td>1-5</td><td>5</td></tr><tr><td>5-10</td><td>10</td></tr><tr><td>10-20</td><td>20</td></tr><tr><td>20-40</td><td>40</td></tr><tr><td>&gt;40</td><td>50</td></tr></table> <p>There is availability of Muar River at Lanadron Estate. Buffer zone has been established and marked with white paint. No evidence of chemical applications along the buffer zone. The river were desilt on annual basis by the Department Irrigation and Drainage. The estate conducted river water sampling on annually basis.</p> <p><u>Lanadron Estate</u></p> <ul style="list-style-type: none"><li>• Date of report: 18/07/2024</li><li>• Report No: IE1025/2024</li><li>• Date Tested: 11/06/2024</li></ul> <p>There is off spec result for pH, COD, SS and DO. Estate has do the investigation dated 22/06/2024 and sent for resampling dated 24/09/2024. Result was in progress. The issue was captured during the internal gap</p>	River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak	1-5	5	5-10	10	10-20	20	20-40	40	>40	50	
River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak														
1-5	5														
5-10	10														
10-20	20														
20-40	40														
>40	50														

		<p>analysis to do resample. Resampling was resubmitted on 24/09/2024 and the result is yet to be obtained.</p> <p>The mill management has conducted the upstream and downstream water testing every month, sample of the result of the testing conducted on 22/08/2024 is as the following:</p> <table><tr><th>Parameter</th><th>US-Prt Jono</th><th>DS- Prt Jono</th><th>UP- 300 meter before Discharge</th><th>DS- 300 meter after discharge</th></tr><tr><td>pH</td><td>6.74</td><td>7.14</td><td>6.89</td><td>8.58</td></tr><tr><td>BOD</td><td>7.14</td><td>2</td><td>4</td><td>16</td></tr><tr><td>COD</td><td>6.89</td><td>32</td><td>52</td><td>244</td></tr><tr><td>SS</td><td>6</td><td>12</td><td>8</td><td>24</td></tr><tr><td>TN</td><td>2</td><td>2</td><td>8</td><td>3</td></tr><tr><td>AN</td><td>&lt;1</td><td>&lt;1</td><td>5</td><td>&lt;1</td></tr><tr><td>O&amp;G</td><td>1</td><td>1</td><td>2</td><td>1</td></tr><tr><td>DO</td><td>3.67</td><td>3.81</td><td>3.21</td><td>2.70</td></tr></table> <p>US – Upstream , DS- Downstream</p>	Parameter	US-Prt Jono	DS- Prt Jono	UP- 300 meter before Discharge	DS- 300 meter after discharge	pH	6.74	7.14	6.89	8.58	BOD	7.14	2	4	16	COD	6.89	32	52	244	SS	6	12	8	24	TN	2	2	8	3	AN	<1	<1	5	<1	O&G	1	1	2	1	DO	3.67	3.81	3.21	2.70	
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DO	3.67	3.81	3.21	2.70																																												
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The Compliance Schedule for Pagoh POM dated 01/07/2024 until 30/06/2025 has outline the limit perimeter for the effluent discharge. BOD at 20 mg/l, SS at 200 mg/l, O&amp;G at 5.0 mg/l, AN at 20 mg/l, TN at 200 mg/l, pH between 5.00 to 9.00 and temperature not above 45°C.</p> <p>The mill management has conducted monthly submission to DOE and result taken for effluent final discharge as well as upstream and downstream along the water stream. Result of the lab test is as the following:</p> <p>Final Discharge</p> <table><tr><th>Parameter</th><th>July 2024</th><th>Aug 2024</th><th>Sep 2024</th><th>Limit</th></tr></table>	Parameter	July 2024	Aug 2024	Sep 2024	Limit	<p>Non-compliance</p>																																								
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		pH	8.7	9.1	9.2	5<x<9
		BOD	17	19	8	20
		SS	110	41	14	200
		TN	43	49	41	200
		AN	<1	<1	<1	20
		O&G	7	<1	<1	5
		The mill has submitted the month reporting to DOE that include the effluent final discharge, schedule waste records, upstream and downstream water quality monitoring as per the compliance schedule requirement. However from the record of submission of Effluent Final Discharge point from January 2024 until September 2024 as following:				
Month		pH Value				
January 2024		8.30				
February 2024		9.20				
March 2024		9.08				
April 2024		9.50				
May 2024		9.25				
June 2024		9.05				
July 2024		8.70				
August 2024		9.10				
September 2024		9.20				

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		The limit set for pH in the compliance schedule is between 5.00 to 9.00. the records shown that the mill has exceeded the limit multiple times in the year 2024, thus the minor NC is raised.																					
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Pagoh Palm Oil Mil. Average data as below:</p> <table> <tr> <th>Month</th><th>Water/L</th><th>FFB Processed, MT</th><th>Water/FFB</th></tr> <tr> <td>2023</td><td>154,879.00</td><td>128,934.50</td><td>1.20</td></tr> <tr> <td>July 2024</td><td>23,974.00</td><td>20,762.26</td><td>1.15</td></tr> <tr> <td>Aug 2024</td><td>20,784.00</td><td>18,805.57</td><td>1.11</td></tr> <tr> <td>Sept 2024</td><td>23,269.00</td><td>20,869.80</td><td>1.11</td></tr> </table>	Month	Water/L	FFB Processed, MT	Water/FFB	2023	154,879.00	128,934.50	1.20	July 2024	23,974.00	20,762.26	1.15	Aug 2024	20,784.00	18,805.57	1.11	Sept 2024	23,269.00	20,869.80	1.11	Complied
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<b>Criterion 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised																							
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Management Plan 2024. The document was reviewed/updated on January 2024. Among the Energy Management Plan were:</p> <ul style="list-style-type: none"> <li>i) Worker's housing inspection to ensure no illegal wiring</li> <li>ii) Preventive maintenance programme for estate vehicles</li> <li>iii) Training / Educate workers on fuel saving practices</li> <li>iv) Regular maintenance of transport @ machine as per recommendation</li> </ul>	Complied																				

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		<p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <p>The mill and estate monitored the diesel usage per ton FFB process/production on monthly basis. Reviewed the data FY 2023 as follows:</p> <table border="1"> <thead> <tr> <th>Estate / Mill</th><th>Diesel, (liter)</th><th>FFB, (MT)</th><th>Diesel / FFB</th></tr> </thead> <tbody> <tr> <td>Pagoh POM</td><td>14,750</td><td>128,934.5</td><td>0.11</td></tr> <tr> <td>Lanadron Estate</td><td>42,502</td><td>22,332.8</td><td>1.90</td></tr> <tr> <td>Pagoh Estate</td><td>88,017</td><td>35,563.58</td><td>2.48</td></tr> <tr> <td>Pengkalan Bukit Estate</td><td>59,642</td><td>38,235.85</td><td>1.56</td></tr> </tbody> </table>	Estate / Mill	Diesel, (liter)	FFB, (MT)	Diesel / FFB	Pagoh POM	14,750	128,934.5	0.11	Lanadron Estate	42,502	22,332.8	1.90	Pagoh Estate	88,017	35,563.58	2.48	Pengkalan Bukit Estate	59,642	38,235.85	1.56	
Estate / Mill	Diesel, (liter)	FFB, (MT)	Diesel / FFB																				
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<b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.																							
7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none"> <li>• FFB record book</li> <li>• Stock book</li> <li>• Monthly stock issue</li> <li>• Stock requisition note Mill</li> <li>• Mill Month End Production Report</li> <li>• Monthly production report</li> <li>• Flowmeter &amp; running hours record book</li> <li>• Effluent analysis report</li> </ul>	Complied																				

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		Based on the verification of records; all the sampled issuance was traceable													
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable												
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. Among the plan for pollution preventive action Plan FY 2023/2024 were:</p> <p><u>Lanadron Estate / Pengkalan Bukit Estate</u></p> <table><tr><th>Objective</th><th>Action Plan</th></tr><tr><td rowspan="2">To minimize pollution from estate activities</td><td>To Plant LCC</td></tr><tr><td>Planting vetiver grass alongside drain, water channelling at path, palm debris at lips of the terrace, stop bund</td></tr><tr><td rowspan="3">Management of schedule waste</td><td>To ensure all schedule waste is stored and disposed as per legal requirement</td></tr><tr><td>To provide regular inspection for estate vehicle for operation purposes</td></tr><tr><td>To maintain oil trap as to prevent oil spillage and to provide proper spill kit</td></tr><tr><td rowspan="2"></td><td>To ensure mixing activity at dedicated area</td></tr><tr><td>No spraying near the water catchment area</td></tr></table>	Objective	Action Plan	To minimize pollution from estate activities	To Plant LCC	Planting vetiver grass alongside drain, water channelling at path, palm debris at lips of the terrace, stop bund	Management of schedule waste	To ensure all schedule waste is stored and disposed as per legal requirement	To provide regular inspection for estate vehicle for operation purposes	To maintain oil trap as to prevent oil spillage and to provide proper spill kit		To ensure mixing activity at dedicated area	No spraying near the water catchment area	Complied
Objective	Action Plan														
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	To ensure mixing activity at dedicated area														
	No spraying near the water catchment area														

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		To ensure the activity do not pollute the environment	To erect signages at workers housing complex "Dilarang melakukan pembakaran terbuka".	
			Weekly housing inspection	
		To increase efficiency in the consumption of non renewable and renewable energy.	To ensure no illegal wiring through weekly housing inspection	
			To educate electric saving practises	
			Continuous preventive maintenance for vehicles	
		Implementation of plan is being monitored by appointed person in charge with target of time frame for completion. As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports (Isokinetic Stack & Air Emission Monitoring Report): <u>Year 2024</u> Result: Dust: 64.3 mg/m3 (B5) vs limit 150, CO: 176.33 mg/m3 vs limit 1000 mg/m3. The Dark smoke shown Shade No 0 towards Ringelmann Chart Shade No 1 Latest stack sampling has been conducted on 07/03/2024 and result shown compliance to the Environment Quality (Clean Air) Regulations 2014 For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring. Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored. Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per "Jadual Pematuhan" no. JAS.MHQ.600-3/1/1 for DOE Licence No: 006085.		

		Environmental audit by 3 <sup>rd</sup> party has been conducted annually by Zetxx Liyaxx Mxxx Fadxxx dated 25/10/2023.	
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Visit to the replanting areas in sampled estates confirmed that the land for replanting is not prepared by burning. Interview with the workers and management indicated that they do not prepare land for replating by burning. Verification through document review, interview and site visit confirmed that there is no replanting prepared by burning. Refer Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law – EQA and Regulations 1974. No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Fire prevention measure has been established. Refer Emergency Preparedness and Response Procedures. Refer document no. UM/HSE/SP/02. Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire is detected, inform estate. SD Guthrie engaged the Smart Hotspot Alert that monitored by satellite VIIRS for fire prevention. SD Guthrie Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data. The system monitors any possible occurrence of fire within or nearby the concession areas throughout SD Guthrie Berhad operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.	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>There is evidence that management has engaged with stakeholders regarding on fire prevention and control measures. Refer sample of matters stated details on Fire Prevention in the Stakeholder meeting on 12/09/2024 for all estates and mill in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC).</p>	Complied
<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting has taken place in any of the three estates, as confirmed by this audit. This conclusion was reached by reviewing the area and hectare statements as well as the 5-year budget plan. A site visit and interviews with the management of both estates also verified this. Therefore, this indicator is not applicable</p>	Not Applicable
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b></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>In the re-assessment report from August 2016, several High Conservation Value (HCV) areas were identified within the SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) estates. These areas include a 19.41-hectare River Reserve along the Muar River, located in Lanadron Estate. Additionally, multiple water catchment areas were identified, including three within Pagoh Estate, with sizes of 5.10 hectares, 2.80 hectares, and 1.20 hectares, respectively. Two other water catchment areas, measuring 1.64 hectares and 1.23 hectares, were located in Pengkalan Bukit Estate.</p> <p>The total HCV area across the estates amounts to 31.38 hectares. All areas were inspected, verified, and documented, and the recategorization of these areas did not affect other categories, including planted areas. Environmentally sensitive aspects, such as ponds, streams, and wildlife boundaries, were taken into consideration. Conservation and monitoring</p>	Complied

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	- Critical (Major) compliance -	efforts are ongoing for these identified HCV areas, including monitoring of sensitive areas like river bunds and areas bordering the estate. The audit confirmed no new planting activities in SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) estates after November 15, 2018, thus the current HCV assessment for these areas remains valid	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable	Not Applicable
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The re-assessment of High Conservation Value (HCV) areas was meticulously conducted by the GSD team (formerly known as PSQM) in September 2016 for the estates under SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC). The comprehensive report contains detailed insights into the identification, classification, and management of HCV areas. Key highlights of the report are as follows:</p> <p>b) Overview of the HCV assessment process</p> <p>c) Detailed description of the assessment area, which includes:</p> <ul style="list-style-type: none"> <li>• Landscape context and setting</li> <li>• Biodiversity and key conservation values</li> <li>• Ecosystem services, as well as social and cultural significance</li> </ul> <p>c) HCV criteria and their application within the agricultural context, featuring:</p> <ul style="list-style-type: none"> <li>• Visual observations and relevant supporting information</li> <li>• Presence of wildlife within the plantation</li> <li>• Final decision on the HCV status</li> </ul> <p>d) Management and monitoring strategies for HCV areas.</p> <p>This detailed report provides an in-depth account of the existence of HCV areas, complete with photographs and comprehensive descriptions. Furthermore, it outlines the specific conservation and management plans</p>	Complied



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		<p>for these identified areas. All areas were inspected, verified, and certified as meeting the required standards. Importantly, the reclassification of the HCV hectares did not affect other land use categories, including the planted areas. The exercise took into careful consideration all critical aspects of environmentally sensitive areas, such as ponds, streams, and wildlife corridors, and these have been thoroughly documented.</p> <p>The HCVs and other conservation areas, including environmentally sensitive areas such as bunds along rivers and straits that run through or border the estate, have been duly identified and are under continuous monitoring to ensure compliance with environmental regulations.</p> <p>All stakeholders have been properly briefed in their respective stakeholder meetings. These sessions covered important updates on RSPO/MSPO SD Guthrie Berhad (previously known as Sime Darby Plantation Berhad) compliance and related sustainability efforts, consistent with discussions held in previous meetings.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that no rights of local communities were identified within the HCV areas or HCS forests after 15 November 2018 in the SOU 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) estates. As such, the requirements under this indicator are not applicable.</p>	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p>	<p>According to the biodiversity report, no Rare, Threatened, or Endangered (RTE) species were found in any of the estates. Nevertheless, a comprehensive wildlife monitoring plan has been established and is actively implemented. Regular education on the status of RTE species is provided to the workforce through muster briefings. In addition, signage prohibiting hunting and intrusion has been strategically placed throughout the estates, particularly at entry points, to raise awareness among workers and the surrounding communities.</p>	Complied

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	- Minor compliance -	All High Conservation Value (HCV) areas have been properly maintained by the management of both the estates and the mill. This initiative carefully considers all environmentally sensitive areas, such as ponds, streams, and wildlife corridors, and these aspects have been thoroughly documented. Monitoring is conducted on a monthly basis by the respective estates, and verification of all monitoring records, as well as site visits, confirms that these areas are being well maintained.	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	Educational activities on RTE species were done through a few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of hunting or endangering the RTE species. Sighted the management also conducted the RTE monitoring, sample in Pengkalan Bukit Estate, Lanadron Estate and Pagoh Estate. Refer HCV monitoring latest record for the month of July, August and September 2024.	Complied
7.12.8	<b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	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 19 – Pagoh Palm Oil Mill Unit of Certification (UoC) estates. There is no land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018. Hence, the requirement under this indicator is not applicable	Not Applicable

## Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **Strategic Operating Unit (SOU 19) - Pagoh Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2023** for **Strategic Operating Unit (SOU 19) - Pagoh Palm Oil Mill** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.42
PKO	1.42

Extraction	%
OER	19.42
KER	5.04

Production	t/yr
FFB Process	128,856.00
CPO Produced	25,027.29
PKO Produced	6,493.99

Land Use	Ha
OP Planted Area	12,374.79
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	40.37
<b>Total</b>	<b>12,415.16</b>

## Summary of Field Emission and Sink

	Own			Group			3 <sup>rd</sup> Party			
Description	tCO2e	tCO2e/ ha	tCO2e/t FFB	tCO2e	tCO2e/ ha	tCO2e/t FFB	tCO2e	tCO2e /ha	tCO2e/t FFB	Total
Emission Source										
Land Conversion	61,753.67	9.44	0.65	186.88	0.03	0.81	0.00	0.00	0.00	61,940.55
CO2 Emissions from Fertiliser	7,278.81	1.11	0.08	18.96	0.00	0.08	0.00	0.00	0.00	7,297.77
N2O Emissions from Peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N2O Emissions from Fertiliser	3,449.32	0.53	0.04	8.68	0.00	0.04	0.00	0.00	0.00	3,458.00
Fuel Consumption	28.67	0.00	0.00	0.08	0.00	0.00	0.00	0.00	0.00	28.75
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sinks										
Crop Sequestration	-58,347.66	-8.92	-0.62	-175.87	-0.03	-0.76	0.00	0.00	0.00	-58,523.54
Sequestration in Conservation Area	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	14,162.80	2.16	0.15	38.73	0.01	0.17	5,143.23	0.00	0.00	19,344.76

*\*Note: Includes both estates and smallholders*

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#### Summary of Mill Emission and Credit

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	25,257.96	020
Fuel Consumption	2.55	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>25,260.51</b>	<b>0.20</b>

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

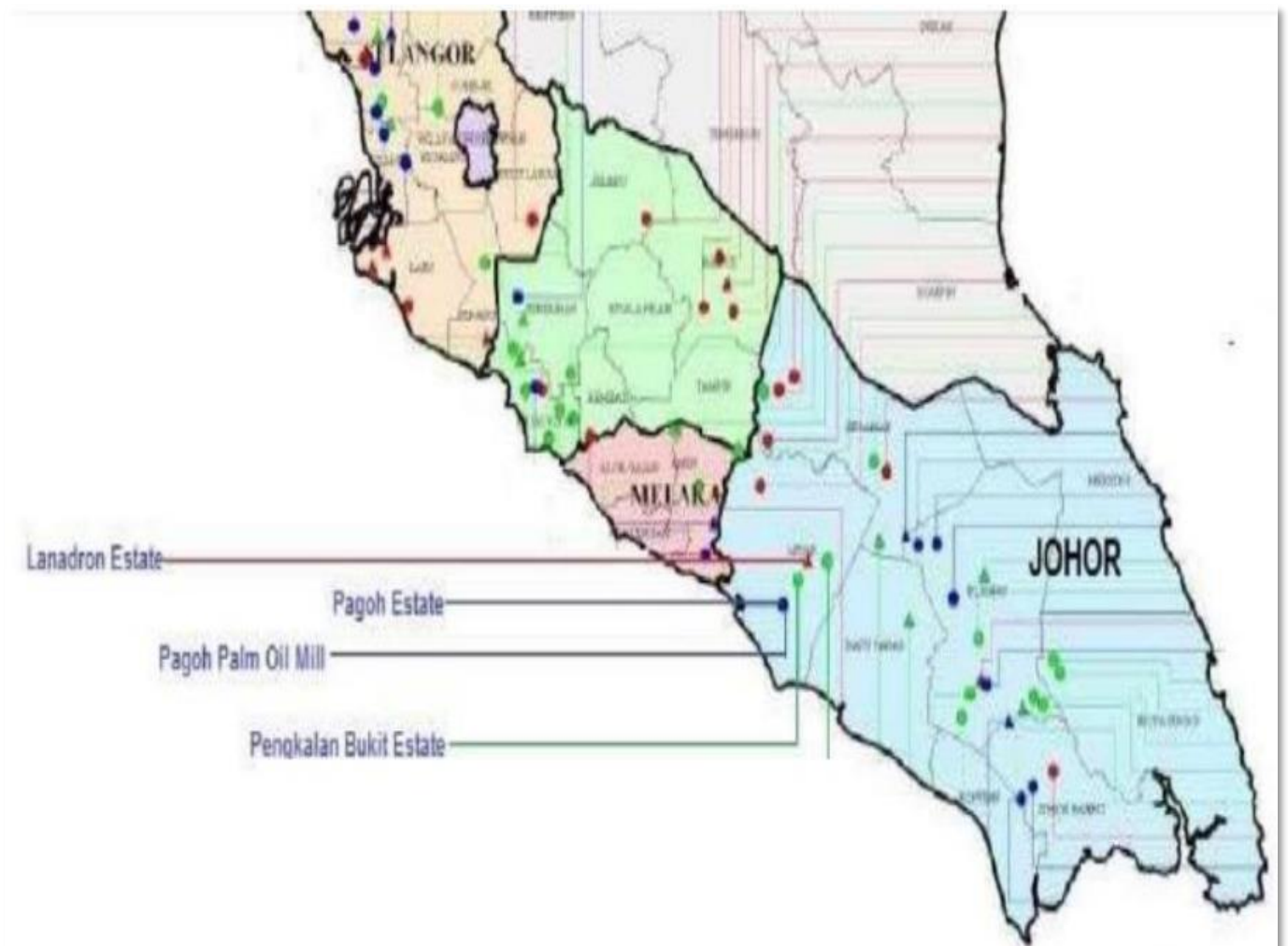
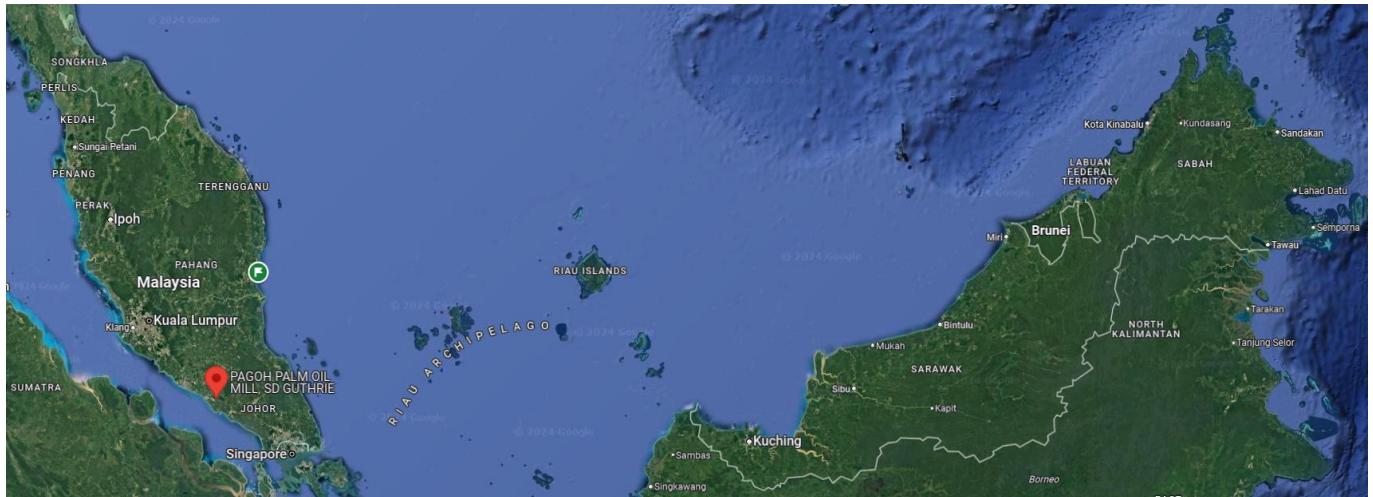
Emissions	tCO <sub>2</sub> e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

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

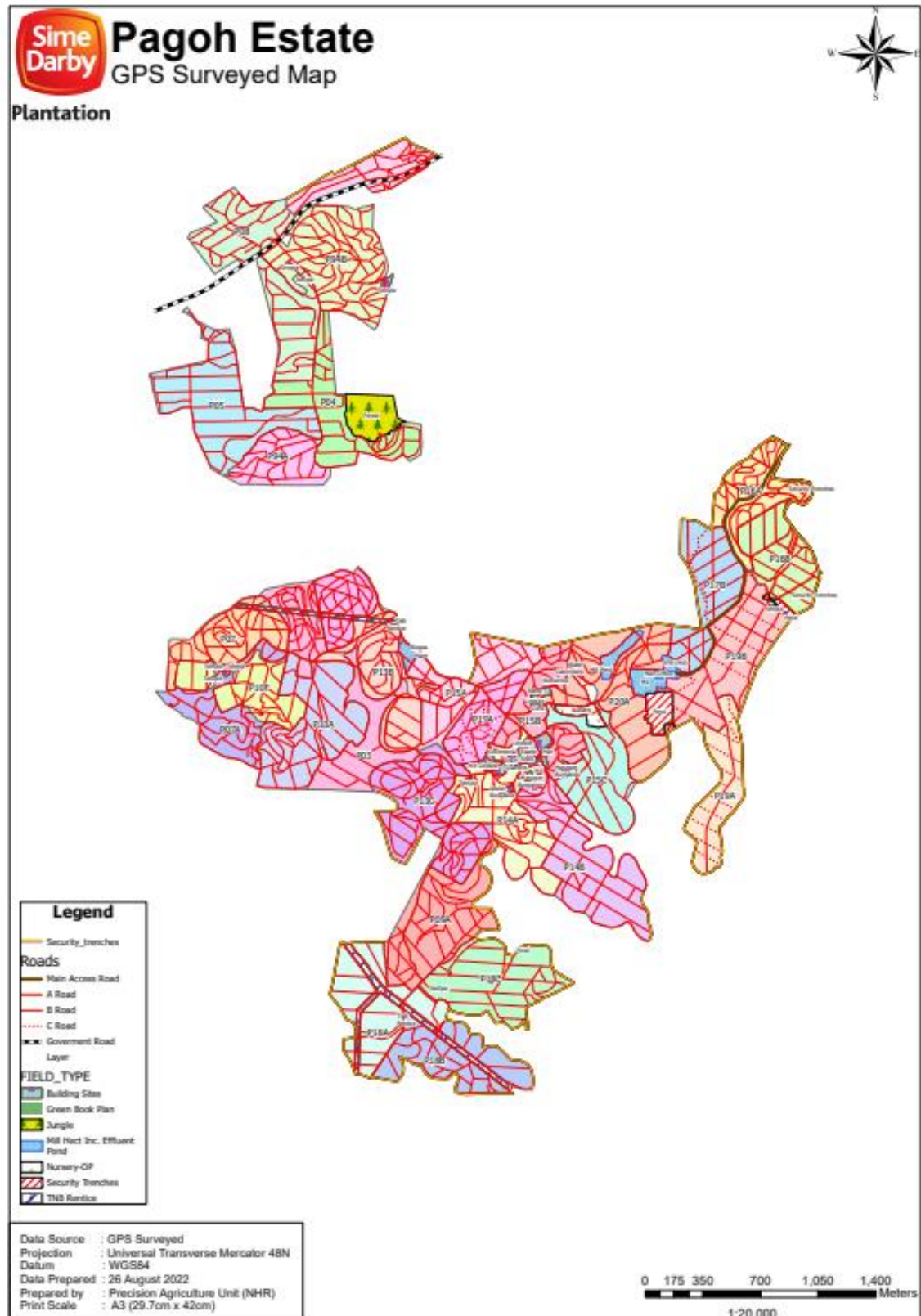
**Appendix C: Location Map of Certification Unit and Supply bases**





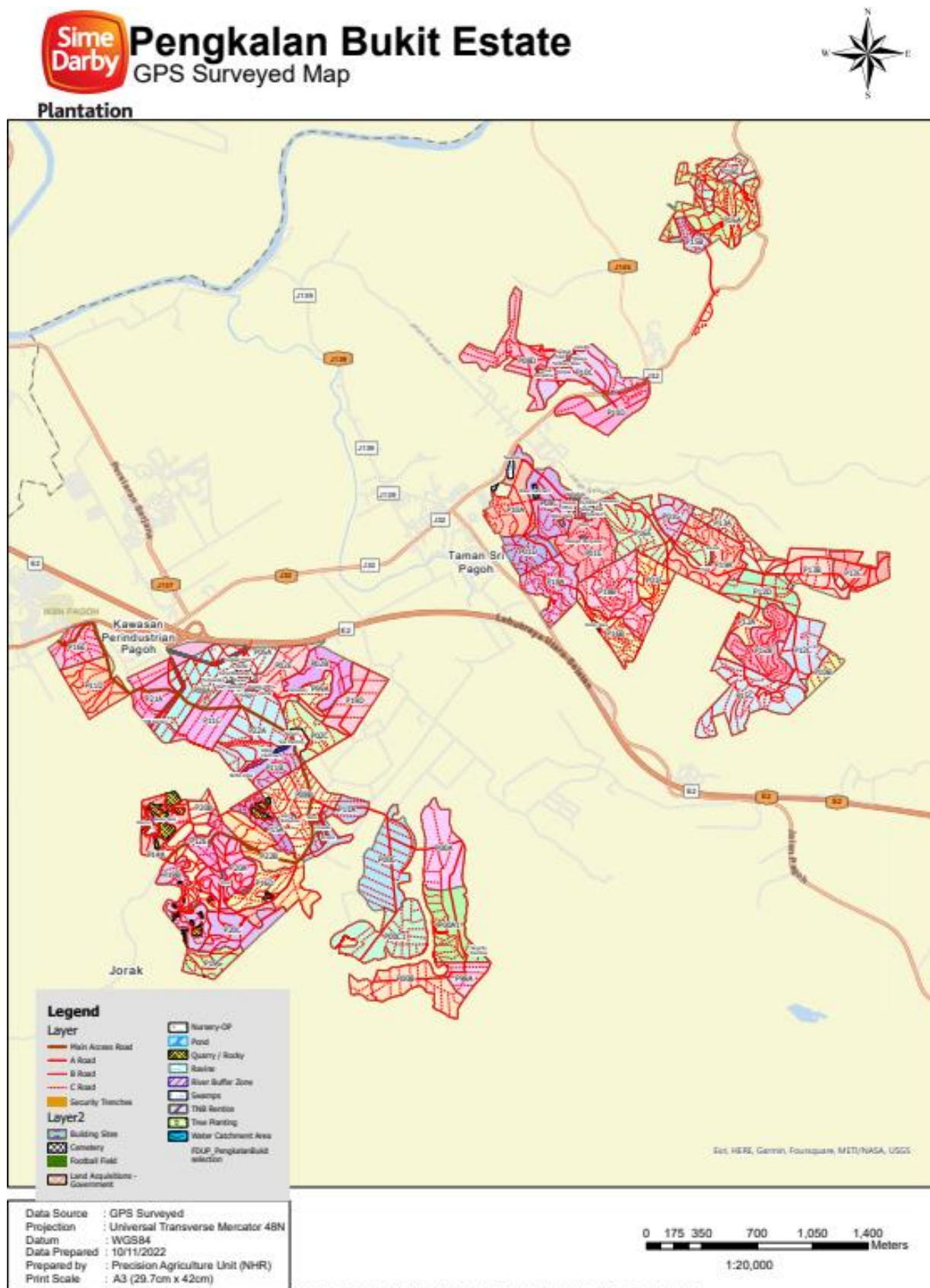
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**Appendix D: Estate Field Map**

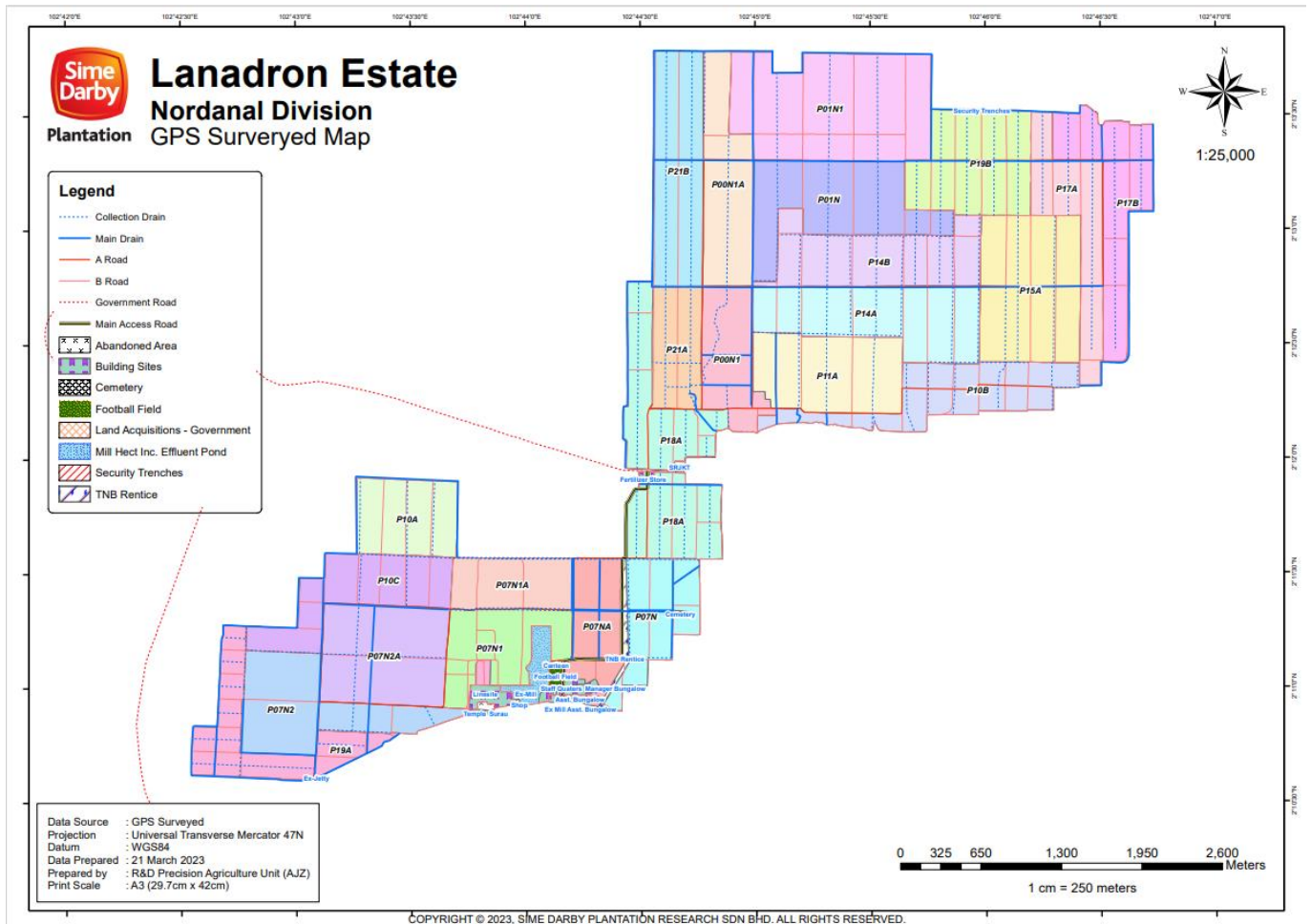


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#### Appendix E: List of Smallholder Registered and/or sampled

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

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

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#### Appendix F: List of Abbreviations

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