

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company Name / Parent Company: SD Guthrie Berhad
Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 2) - Chersonese Palm Oil Mill
Location of Certification Unit: Lot 4647, Jalan Gula, Kuala Gula 34350 Kuala Kurau, Perak, Malaysia
Date of Final Report: 14/10/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SD Guthrie Berhad (Previously Known as Sime Darby Plantation Berhad)		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 11, Main Block, Plantation Tower, 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 2) - Chersonese Palm Oil Mill		
Location / Address	Lot 4647, Jalan Gula, Kuala Gula, 34350 Kuala Kurau, Perak, Malaysia		
Website	https://www.sdguthrie.com		
Management Representative	Mdm. Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD) Bukhari Yusof Azuddin (Mill Manager)	E-mail	shylaja.vasudevan@sdguthrie.com kks.chersonese@sdguthrie.com
Telephone	+603 78484000 (Head Office)	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 590800	Certificate Start Date	05/10/2021
Date of First Certification	05/10/2011	Certificate Expiry Date	04/10/2026
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input 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	<input checked="" type="checkbox"/> On-site audit (Option	<input type="checkbox"/> On-site audit (Option	<input type="checkbox"/> Remote audit (Option B)

on-site audit	AI)	AII)	
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3. Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 688334	MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn. Bhd	09/01/2028
MSPO 682039	MS 2530-4:2013 – General Principles for Palm Oil Mills		09/01/2028
MSPO 714137	MSPO Supply Chain Certification Standard 2018		20/11/2024

4. Location(s) of Mill & Supply Bases

Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Chersonese Palm Oil Mill	Lot 4647, Jalan Gula, Kuala Gula 34350 Kuala Kurau, Perak, Malaysia	4° 58' 39.04" N	100° 27' 41.00" E
Chersonese Estate	Ladang Chersonese, 34350 Kuala Kurau, Perak, Malaysia	4°59' 24.06" N	100° 27' 13.00" E
Holyrood Estate	Ladang Holyrood, 34100 Selama, Perak, Malaysia	5°07' 27.00" N	100° 42' 36.03" E
Tali Ayer Estate	Ladang Tali Ayer, 34300 Bagan Serai, Perak, Malaysia	5°03' 30.02" N	100° 31' 20.09" E
Kalumpong Estate	Ladang Kalumpong/Byram, 34300 Bagan Serai, Perak, Malaysia	4° 58' 11.09" N	100° 36' 05.09" 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
Chersonese Estate	2,844.19	25.87	423.66	3,293.72	86.35
Holyrood Estate	1,219.16	12.19	101.39	1,332.74	91.48
Tali Ayer Estate	3,100.18	22.62	607.14	3,729.94	83.12
Kalumpong Estate	2,529.28	21.09	166.43	2,716.80	93.10
Total	9,692.81	81.77	1,298.62	11,073.20	87.53

Holyrood Estate : Reduction of 3.12ha from total planted and add 3.12ha in infrastructure & others (ha) due to opening of laterite quarry at Bukit Rhona Division

Tali Ayer Estate : Reduction of 16.36ha from Infrastructure & others and added in total planted due to replanting of previous planted abandoned (other) area

6. Plantings & Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Chersonese Estate	324.56	2,128.04	391.59	-	2,519.63	324.56
Holyrood Estate	-	965.70	253.46	-	1,219.16	-
Tali Ayer Estate	515.38	1,383.14	1,201.66	-	2,584.80	515.38
Kalumpang Estate	439.79	840.45	375.26	873.78	2,089.49	439.79
Total	1,279.73	5,317.33	2,221.97	873.78	8,413.08	1,279.73

Only Mature area is considered as production area

Holyrood Estate : Reduction of 3.12ha from mature palm due to opening of laterite quarry at Bukit Rhona Division

Tali Ayer Estate : Reduction of 16.36ha from Infrastructure & others and added in total planted due to replanting of previous planted abandoned (other) area

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 23 – Sep 24)	Actual (Jul 23 – Jul 24)		Forecast (Oct 24 – Sep 25)
		Previous license period (Jun 23 – Sep 23)	Current license period (Oct 23 – Jul 24)	
Chersonese Estate	58,883.78	12,807.71	35,467.29	60,829.40
Holyrood Estate	26,324.39	7,255.48	14,213.65	28,107.00
Tali Ayer Estate	43,299.35	17,150.40	40,760.30	51,558.43
Kalumpang Estate	50,467.00	13,224.81	30,481.26	45,093.46
Total	178,974.52	171,360.90		185,588.29

Note: Higher forecast anticipated with increase of mature fields.

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 23 – Sep 24)	Actual (Jul 23 - Jul 24)		Forecast (Oct 24 - Sep 25)
		Previous license period (Jul 23 - Sep 23)	Current license period (Oct 23 - Jul 24)	
Somme Estate		46.34	324.08	
Bukit Hijau Estate *		32.87	285.29	

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Sungai Dingin Estate *		13.32	461.61	
Bukit Selarong Estate *		67.08	581.92	
Padang Buloh Estate *		43.34	840.27	
Jentayu Estate *		18.81	245.72	
Elphil Estate **		0.00	684.44	
Kamuning Estate **		0.00	548.30	
Elphil Mill **		0.00	61.63	
Total		4,255.02		

Note:

* RSPO cert. #RSPO 550179; Validity period: 12/08/2020 – 11/08/2025

* RSPO cert. #RSPO 550180; Validity period: 18/06/2021 – 17/06/2026

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)

Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 23 – Sep 24)	Actual (Jul 23 - Jul 24)		Forecast (Oct 24 - Sep 25)
		Previous license period (Jul 23 - Sep 23)	Current license period (Oct 23 - Jul 24)	
Sxxx		292.24	506.49	
Cxxx		2,338.81	5,940.36	
Exxx		0.00	37.71	
Total		9,115.61		

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit

No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	July 2023	13,867.55	839.56	14,707.11
2	August 2023	16,746.44	778.62	17,525.06
3	September 2023	14,609.94	601.26	15,211.20
4	October 2023	13,604.71	640.60	14,245.31
5	November 2023	14,342.00	510.84	14,852.84
6	December 2023	13,094.26	775.20	13,869.46
7	January 2024	12,053.11	953.29	13,006.40
8	February 2024	12,189.46	898.82	13,088.28
9	March 2024	12,264.03	879.11	13,143.14

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10	April 2024	13,073.89	526.84	13,600.73
11	May 2024	12,486.62	563.17	13,049.79
12	June 2024	11,533.92	628.73	12,162.65
13	July 2024	15,749.99	519.57	16,269.56
TOTAL		175,615.92	9,115.61	184,731.53

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

Estimated last year (Oct 23 – Sep 24)	Actual (Jul 23 - Jul 24)		Forecast (Oct 24 - Sep 25)
	Previous license period (Jul 23 - Sep 23)	Current license period (Oct 23 - Jul 24)	
FFB	FFB		FFB
178,974.52 mt	45,223.93 mt	130,391.99 mt	185,588.29 mt
	TOTAL	175,615.92 mt	
CPO (OER: 20.28 %)	CPO (OER: 19.69 %)		CPO (OER: 20.24 %)
36,296.03 mt	8,927.20 mt	25,653.27 mt	37,563.07 mt
	TOTAL	34,580.47 mt	
PK (KER: 5.35 %)	PK (KER: 5.02 %)		PK (KER: 5.53 %)
9,575.13 mt	2,274.76 mt	6,536.78 mt	10,207.35 mt
	TOTAL	8,811.54 mt	

10A. Monthly Records of Certified CPO & PK since the last audit

No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	July 2023	2,799.89	727.66
2	August 2023	3,298.73	829.89
3	September 2023	2,828.58	717.21
4	October 2023	2,637.85	656.53
5	November 2023	2,660.94	692.60
6	December 2023	2,522.54	606.57
7	January 2024	2,411.43	637.68
8	February 2024	2,489.46	642.03
9	March 2024	2,468.86	619.81
10	April 2024	2,475.58	642.67
11	May 2024	2,517.24	645.50

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12	June 2024	2,079.72	571.75
13	July 2024	3,389.65	821.64
TOTAL		34,580.47	8,811.54

11. Summary of Actual Volume sold

Current License period (Oct 23 - Jul 24)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	1,856.59	-	-	21,059.83	22,916.42
PK (MT)	2,204.12	-	-	3,427.73	5,631.85
Credits	-	-	-	-	-

Previous License period (Jul 23 - Sep 23)

CPO (MT)	-	-	-	9,660.07	9,660.07
PK (MT)	996.42	-	-	2,108.10	3,104.52
Credits	-	-	-	-	-

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

No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Sxxx1	RSPO_PO1000000310	-	394.15
2	Sxxx1	RSPO_PO1000000310	-	351.99
3	Sxxx1	RSPO_PO1000000310	-	447.85
4	Sxxx1	RSPO_PO1000000310	-	440.06
5	Sxxx1	RSPO_PO1000000310	-	173.70
6	Sxxx2	RSPO_PO1000013655	400.03	-
7	Sxxx1	RSPO_PO1000000310	-	502.83
8	Sxxx2	RSPO_PO1000013655	841.44	-
9	Sxxx1	RSPO_PO1000000310	-	265.18
10	Sxxx3	RSPO_PO1000000309	39.85	-
11	Sxxx1	RSPO_PO1000000310	-	235.50
12	Sxxx3	RSPO_PO1000000309	119.40	-
13	Sxxx2	RSPO_PO1000000310	315.71	-
14	Sxxx2	RSPO_PO1000000310	140.16	-
15	Sxxx1	RSPO_PO1000000310	-	389.28

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TOTAL	1,856.59	3,200.54
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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)
Nil	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	Nxxx	19,995.25	-
2	Wxxx	3,747.67	-
3	Mxxx	6,976.98	-
4	Sxxx	-	2,205.76
5	Kxxx	-	1,320.58
6	Pxxx	-	2,009.49
TOTAL		30,719.90	5,535.83

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 (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
	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	-	-	-	-	-	-
TOTAL		-	-	-	-	-
Note: 1 mt = 1 credit						

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

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

Section 2: Assessment Process

Certification Body:

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

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **05/08/2024 - 09/08/2024**. The audit programme is included as Section 2.3.

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

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

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

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

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

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

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

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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)
Chersonese Palm Oil Mill	x	x	x	x	x
Chersonese Estate	x	x	x	x	x
Holyrood Estate	x	x	x	x	x
Kalumpong Estate	x	x	x	x	x
Tali Ayer Estate	x	x	x	x	x

Tentative Date of Next Visit: August 4, 2025 - August 8, 2025

Total Number of Mandays: 15 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Hafriazhar bin Mohd Mokhtar (HMM)	Team Leader	<p>Education: Bachelor of Engineering (Hons.) Chemical Engineering, UTM</p> <p>Work Experience: Environmental Officer (2002-2003), Mill Engineer (2003-2008), Project Control Engineer (2008-2011), Auditor/Client Manager (2011-present)</p> <p>Training attended: Social Auditing & SMETA Training (2021), ISO 45001 LA Training (2018), RSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011)</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Fahmi Bin Othman (FBO)	Team Member	<p>Education: Bachelor's Degree in Industrial Biology from Universiti Teknologi Malaysia, graduated in 2010.</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an Assistant Manager with FGV Plantation (M) Sdn Bhd managing the day-to-day plantation operations before joining FGV Holdings</p>

		<p>Berhad as Sustainability Officer for another significant numbers of years. In his career at FGV, Fahmi had accumulated more than 7 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans</p> <p>Training attended: He has completed CQI – IRCA approved ISO 9001, and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course as well as SA 8000.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Nor'ain binti Mohd Nasir (NMN)	Team Member	<p>Education: She graduated in Bachelor of Science (Hons) (Plantation Technology and Management) from University Teknologi Mara (UiTM).</p> <p>Work Experience: She has 10 years working experience in plantation company with various departments such as Estate Operations, Risk and System Management Department and Sustainability and Quality Department prior to joining Certification Body as an Auditor for more than 4 years. She is familiar with oil palm operations and its supply chain including Social, Environmental, Safety and Health, Legal and Good Agricultural practices. She is involved in auditing MSPO OPMC, MSPO SCCS, RSPO P&C, RSPO SCCS, ISCC EU and PLUS Basic Training, ISCC Waste & Residue and ISCC Independent Smallholder.</p> <p>Training attended: She has completed 14001:2015 (2019), ISO 9001:2015 (2024), ISO 45001:2018 (2024), Endorsed MSPO Auditor Course (2019), Endorsed MSPO SCCS Auditor Course (2019), Endorsed RSPO P&C Lead Auditor Course (2019), Endorsed RSPO SCCS Lead Auditor Course (2019), SA8000 (2019), ISCC EU and PLUS Basic Training (2019), ISCC Waste And Residue (2020), ISCC Independent Smallholder (2020), ISCC (ARIA) Platform (2023), Roundtable on Sustainable Biomaterials (RSB) (2020), Refresher-endorsed RSPO P&C 2018 Lead Auditors Training Course (2024) and RSPO-endorsed RSPO SCCS Refresher Course (2022).</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

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Accompanying Persons:

Name	Role
-	-

2.3 Assessment Plan

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

Date	Time	Subjects	HMM	FBO	NMN
Sunday, 04/08/2024	AM - PM	Audit team travel to Taiping & check-in at Flemington Hotel	✓	✓	✓
Monday, 05/08/2024 Day 1 Tali Ayer Estate	8:30 AM – 9:00 PM	Opening meeting (with MSPO) • Opening Presentation by Audit team leader • Confirmation of assessment scope • Audit plan including stakeholder's consultation • Verification on previous audit findings	✓	✓	✓
	9:00 PM – 12:00 PM	Tali Ayer Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	2:00 PM – 4:30 PM	Tali Ayer Estate Document Assessment P1 – P7: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	4:30 PM – 5:00 PM	• Auditors' discussion • Day 1 Interim Closing Briefing	✓	✓	✓

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Date	Time	Subjects	HMM	FBO	NMN
Tuesday, 06/08/2024 Day 2 Chersonese Estate	9:00 AM – 12:30 PM	Chersonese Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	10:00 PM – 12:00 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	-	✓
	12:30 PM – 1:30 PM	Lunch break	✓	✓	✓
	1:30 PM – 4:30 PM	Chersonese Estate 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	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors' discussion Day 2 Interim Closing Briefing 	✓	✓	✓
Wednesday, 07/08/2024 Day 3 Chersonese Palm Oil Mill	9:00 AM – 12:30 PM	Chersonese Palm Oil Mill Mill visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc.	✓	✓	✓
	10:00 PM – 12:00 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	-	✓
	12:30 AM – 1:30 PM	Lunch break	✓	✓	✓

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Date	Time	Subjects	HMM	FBO	NMN
	1:30 PM – 4:30 PM	Chersonese Palm Oil Mill Document Review P1 – P7: <ul style="list-style-type: none"> SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation RSPO SCC general requirements, supply chain for CPO mill, internal audit, management review, sales and purchasing documents, mass balance accounting, market communications and claim and other relevant documents and records. 	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors' discussion Day 3 Interim Closing Briefing 	✓	✓	✓
Thursday, 08/08/2024 Day 4 Holyrood Estate	9:00 AM – 12:30 PM	Holyrood Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	10:00 PM – 12:00 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	-	✓
	12:30 PM – 1:30 PM	Lunch break	✓	✓	✓
	1:30 PM – 4:30 PM	Holyrood Estate 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	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors' discussion Day 4 Interim Closing Briefing 	✓	✓	✓

Date	Time	Subjects	HMM	FBO	NMN
Thursday, 09/08/2024 Day 5 Kalumpang Estate	9:00 AM – 12:30 PM	Kalumpang Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	12:30 PM – 2:30 PM	Lunch break & Friday prayer	✓	✓	✓
	2:30 PM – 4:00 PM	Kalumpang Estate 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	✓	✓	✓
	4:00 PM – 4:30 PM	<ul style="list-style-type: none"> Auditors' discussion Preparation for Closing Meeting 	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Closing Meeting 	✓	✓	✓

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	SD Guthrie Berhad (<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): https://www.sdguthrie.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO	Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some	Complied

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<p>membership?</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021</p>	<p>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.</p>	
<p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p>	<p>There are no new acquisitions. There is new propose on 2024 for Land legalization still in progress dated approval by RSPO on 13 July 2023 for these Estate.</p> <p>(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.</p>	Complied
<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>Although there is deviation has been identified at those Indonesia management units, but it has been justified and approved by RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.</p>	Complied
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.</p> <p>Is this consistent with the ACOP reporting?</p>	<p><u>Indonesia</u></p> <ul style="list-style-type: none"> - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. - PT Mitral Austral Sejahtera: The properties were sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. 	Complied

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	<p><u>Malaysia</u></p> <ul style="list-style-type: none"> - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. - Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction. <p><u>Papua New Guinea</u></p> <ul style="list-style-type: none"> - Markham Farming Company Limited (MFCL)/ Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement <p><u>Liberia</u></p> <ul style="list-style-type: none"> - As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/. <p>ACOP 2023 has been cross-referenced as below: https://rspo.org/members/1-0008-04-000-00/</p>	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly	Complied

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and HCS in accordance with RSPO P&C criterion 7.12.	are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/ 2023.	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification:</p> <p>(1) NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</p> <p>(2) NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/ 2018 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/</p> <p>(3) NBPOL (Ramu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</p> <p>(4) NBPOL (Ramu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</p> <p>(5) NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</p> <p>(6) NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/</p> <p>(7) NBPOL (Poliamba Limited – Lamendauen) 07/04/ 2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/</p> <p>(8) NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/</p> <p>(9) NBPOL (J estate) 01/11/2013</p>	Complied

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

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	As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C. It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about land conflict has been lodge by stakeholders as at the day of audit.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	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 labor, stakeholders and communities are to be dealt using this mechanism. As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, no labour dispute issues reported. 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. Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labour, stakeholders and communities are to be dealt using this mechanism	Complied
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	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. Under RSPO DSF, the latest registered complaint for SD was in 2017. No latest complaint case reported in DSF.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue is mainly waiting for Land Titles. 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 Sime Darby Plantation Berhad operations since 2010, there has been no clearance	Complied

	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.	Not applicable as there is no smallholder scheme under SOU2 Chersonese Certification Unit.	Not Applicable

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Approved Time Bound Plan

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

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	Indonesia	Blang Simpo -1 Estate	3,460.06	Certified	Not Applicable	3-May-13					
	Indonesia	Blang Simpo -2 Estate	2,677.83	Certified	Not Applicable	3-May-13					
	Indonesia	Tamiang (PT PPP) Estate	1,451.99	Certified	Not Applicable	3-May-13					
	Indonesia	Batang Ara (PT PSK) Estate	1,187.34	Certified	Not Applicable	3-May-13					
Teluk Bakau	Indonesia	Teluk Bakau Mill	13,317.81	Certified	Not Applicable	11-Oct-11					
	Indonesia	Teluk Bakau Estate	4,025.07	Certified	Not Applicable	11-Oct-11					
	Indonesia	Nusa Lestari Estate	3,456.74	Certified	Not Applicable	11-Oct-11					
	Indonesia	Nusa Perkasa Estate	5,836.00	Certified	Not Applicable	11-Oct-11					
Mandah	Indonesia	Mandah Mill	12,366.18	Certified	Not Applicable	1-Apr-14					
	Indonesia	Mandah Estate	5,053.18	Certified	Not Applicable	1-Apr-14					
	Indonesia	Rotan Semelur Estate	7,313.00	Certified	Not Applicable	1-Apr-14					
Sungai Pinang	Indonesia	Sungai Pinang Mill	6.513	Certified	Not Applicable	11-Sep-12					
	Indonesia	Sungai Pinang Estate	3,374.42	Certified	Not Applicable	11-Sep-12					
	Indonesia	Bukit Pinang Estate	3,138.58	Certified	Not Applicable	11-Sep-12					
Ladang Panjang	Indonesia	Ladang Panjang Mill	1,202.04	Certified	Not Applicable	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,202.04	Certified	Not Applicable	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,796.19	Not Certified	2023	NA		Yes	2024	Land legalization process for 1,796.19 ha is still in progress.	13-Jul-23
Rantau Panjang	Indonesia	Rantau Panjang Mill	10,139.91	Certified	Not Applicable	16-Mar-12					
Rantau	Indonesia	Bumi Ayu Estate	2,960.98	Certified	Not Applicable	16-Mar-12					

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Panjang	Indonesia	Rantau Panjang Estate	2,679.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rantau Panjang Estate	1,843.73	Not Certified	2023	NA		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Napal Estate/Karang Ringin	4,359.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Napal Estate/Karang Ringin	1,843.73	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal 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					

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	Indonesia	Gunung Sari Estate	2,826.94	Certified	Not Applicable	6-Jul-11					
Mustika	Indonesia	Mustika Mill	14,840.76	Certified	Not Applicable	3-Jul-13					
	Indonesia	Mustika Estate	3,648.74	Certified	Not Applicable	3-Jul-13					
	Indonesia	Pantai bonati Estate	2,534.00	Certified	Not Applicable	6-Jul-11					
Gunung Aru	Indonesia	Gunung Aru Mill	12,740.54	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Aru Estate	2,684.41	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Kemas Estate	3,511.36	Certified	Not Applicable	5-Jul-11					
	Indonesia	Laut Timur Estate	3,207.28	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pantai Timur Estate	3,337.49	Certified	Not Applicable	5-Jul-11					
Ungkaya	Indonesia	Ungkaya Mill	4,145.00	Certified	Not Applicable	10-Jul-12					
	Indonesia	Ungkaya Estate	4,145.00	Certified	Not Applicable	10-Jul-12					
Rantau	Indonesia	Rantau Mill	24,169.56	Certified	Not Applicable	30-Dec-11					
	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					

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	Indonesia	Bebunga Estate	3,958.43	Certified	Not Applicable	16-Mar-12					
	Indonesia	Bakau Estate	5,342.14	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sungai Cengal Estate	4,974.20	Certified	Not Applicable	16-Mar-12					
Pondok Labu	Indonesia	Pondok Labu Mill	15,876.20	Certified	Not Applicable	16-Mar-12					
	Indonesia	Pondok Labu Estate	3,569.53	Certified	Not Applicable	16-Mar-12					
	Indonesia	Binturung Estate	4,072.01	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rampa Estate	3,656.20	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sesulung Estate	4,578.46	Certified	Not Applicable	16-Mar-12					
Sekunyir	Indonesia	Sekunyir Mill	7,734.59	Certified	Not Applicable	23-Nov-10					
	Indonesia	Sekunyir Estate	3,555.19	Certified	Not Applicable	23-Nov-10					
	Indonesia	Seruyan Estate	4,179.40	Certified	Not Applicable	23-Nov-10					
Sukamandang	Indonesia	Sukamandang Mill	14,779.92	Certified	Not Applicable	5-Jul-11					
	Indonesia	Sukamandang Estate	3,936.56	Certified	Not Applicable	5-Jul-11					
	Indonesia	Sapiri Estate	3,530.90	Certified	Not Applicable	5-Jul-11					
	Indonesia	Baras Danum Estate	3,664.60	Certified	Not Applicable	5-Jul-11					
	Indonesia	Kuala Kuayan Estate	3,647.86	Certified	Not Applicable	5-Jul-11					
Pemantang	Indonesia	Pemantang Mill	16,601.66	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pemantang Estate	3,857.91	Certified	Not Applicable	5-Jul-11					
	Indonesia	Kawan Batu Estate	4,400.00	Certified	Not Applicable	5-Jul-11					
	Indonesia	Hatantiring Estate	3,811.00	Certified	Not Applicable	5-Jul-11					
	Indonesia	Batang Garing Estate	4,532.75	Certified	Not Applicable	5-Jul-11					
Lembiru	Indonesia	Lembiru Mill	9,409.07	Certified	Not Applicable	3-Jul-14					

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	Indonesia	Lembiru Estate	4,929.49	Certified	Not Applicable	3-Jul-14					
	Indonesia	Awatan Estate	3,476.79	Certified	Not Applicable	3-Jul-14					
	Indonesia	Pelanjau Estate (PT BAL)	1,002.79	Certified	Not Applicable	3-Jul-19					
	Indonesia	Pelanjau Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Beturus Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus 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	2023	N/A		Yes	2024	Land legalization	13-Jul-23

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				Certified						process for 1452.93 ha (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					

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

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	Malaysia	Dusun Durian Estate	3,176.21	Certified	Not Applicable	19-May-10					
West	Malaysia	West Oil Mill	5,912.69	Certified	Not Applicable	19-May-10					
	Malaysia	West Estate	5,912.69	Certified	Not Applicable	19-May-10					
Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	Not Applicable	7-Jul-11					
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	Not Applicable	7-Jul-11					
Kerdu	Malaysia	Kerdu Oil Mill	13,781.50	Certified	Not Applicable	7-Jul-11					
	Malaysia	Kerdu 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					

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	Malaysia	Tampin Linggi Estate	2,106.71	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sg. Bahru Estate	1,427.31	Certified	Not Applicable	18-Feb-14					
	Malaysia	Salak Estate	3,868.86	Certified	Not Applicable	18-Feb-14					
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	Not Applicable	7-Jul-11					
	Malaysia	Muar River Estate	1,584.62	Certified	Not Applicable	7-Jul-11					
	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					
	Malaysia	Kempas Oil Mill	11,828.51	Certified	Not Applicable	20-May-10					
Kempas	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					
	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	Not Applicable	5-Oct-11					
Diamond Jubilee	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					
	Malaysia	Pagoh Oil Mill	7,418.59	Certified	Not Applicable	28-Jan-14					
Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	Not Applicable	28-Jan-14					

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

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	Malaysia	Sembrong Estate	1,778.88	Certified	Not Applicable	11-Apr-11					
Bukit Kerayong	Malaysia	Bukit Kerayong Oil Mill	11,371.82	Certified	Not Applicable	29-Mar-11					
	Malaysia	Sri Pulai 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	Tingkayu 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					

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	Malaysia	Mostyn Estate	4,178.04	Certified	Not Applicable	16-Jan-09					
Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	Not Applicable	16-Jan-09					
	Malaysia	Merotai Estate	3,052.66	Certified	Not Applicable	16-Jan-09					
	Malaysia	Imam Estate	3,773.56	Certified	Not Applicable	16-Jan-09					
	Malaysia	Tiger Estate	2,497.86	Certified	Not Applicable	16-Jan-09					
	Malaysia	Table Estate	2,221.63	Certified	Not Applicable	16-Jan-09					
	Malaysia										
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					
	Malaysia										
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					

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	Malaysia	Samudera Estate	3,308.60	Certified	Not Applicable	30-Dec-11					
	Malaysia	Semarak Estate	2,248.68	Certified	Not Applicable	30-Dec-11					
	Malaysia	Bayu Estate	2,459.90	Certified	Not Applicable	30-Dec-11					
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	Not Applicable	30-Dec-11					
	Malaysia	Derawan Estate	2,490.79	Certified	Not Applicable	30-Dec-11					
	Malaysia	Sahua Estate	2,644.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Takau Estate	2,107.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Damai Estate	2,287.04	Certified	Not Applicable	30-Dec-11					
Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Tetere Estate	2,947.79	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	Not Applicable	18-Mar-11					
	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	Papua New	Hagita Oil Mill	16,508.59	Certified	Not Applicable	15-Feb-13					

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Estates (MBE)	Guinea										
	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					

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	PNG	Smallholders- Division (866)	South	1,257.21	Certified	Not Applicable	19-Mar-12					
	PNG	Smallholders Division (309)	-West	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					

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

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PNG	Karaus Estate	2,387.64	Certified	Not Applicable	10-Sep-08					
PNG	Moroa Estate	848.16	Certified	Not Applicable	10-Sep-08					
PNG	Bilomi Estate	2,011.70	Certified	Not Applicable	10-Sep-08					
PNG	Loata Estate	562.00	Certified	Not Applicable	10-Sep-08					
PNG	Haella Estate	4,220.30	Certified	Not Applicable	10-Sep-08					
PNG	Garu Estate	3,709.60	Certified	Not Applicable	10-Sep-08					
PNG	Daliavu Estate	2,484.10	Certified	Not Applicable	10-Sep-08					
PNG	Sapuri Estate	2,180.90	Certified	Not Applicable	10-Sep-08					
PNG	Malilimi Estate	3,837.00	Certified	Not Applicable	10-Sep-08					
PNG	Rigula Estate	3,720.00	Certified	Not Applicable	10-Sep-08					
PNG	Nomundo Estate	2,645.17	Certified	Not Applicable	10-Sep-08					
PNG	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	Not Applicable	10-Sep-08					
PNG	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	Not Applicable	10-Sep-08					
PNG	Lolokoru Estate	2,453.10	Certified	Not Applicable	10-Sep-08					
PNG	Ove Estate	3,541.00	Certified	Not Applicable	10-Sep-08					
PNG	Tamare Estate	1,362.70	Certified	Not Applicable	10-Sep-08					
PNG	Smallholders LSS Mosa (1822)	5,008.53	Certified	Not Applicable	10-Sep-08					
PNG	Smallholders VOP East (1817)	5,324.37	Certified	Not Applicable	10-Sep-08					
PNG	Smallholders VOP Central (1964)	5,756.57	Certified	Not Applicable	10-Sep-08					

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	PNG	Smallholders VOP West (1279)	2,804.10	Certified	Not Applicable	10-Sep-08					
	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; one (1) Minor nonconformities and one (1) Opportunity For Improvement raised. The Strategic Operating Unit (SOU 2) - Chersonese 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 #	2532582-202408-N1	Issued Date	09/08/2024
Due Date	Next assessment Visit	Closure Date	"Open"
Indicator & Category (Critical / Minor)	3.3.2 – Minor		
Statement of Nonconformity:	A mechanism to check consistent implementation of procedures is in place.		
Requirement Reference:	Implementation of waste management procedure and plan is not effectively demonstrated.		
Objective Evidence:	An empty chemical container used for the boiler (NALCO 19 PULV Oxygen Scavenger) was found placed in front of the boiler station. It was observed that the container contained a certain amount of diesel. During an interview, the boiler operator confirmed that diesel is used each time he conducts boiler ignition. This practice is in violation of the SDG's Waste Management Procedure for Upstream Malaysia, Document ID. SD/SDP/GSD/HSE/0522/01, clause 4.2, which states that scheduled waste categorized under List 2 must be disposed of in accordance with the Environment Quality Act 1974, the Environment Quality (Scheduled Waste) Regulation 2005, as well as the waste management plan.		
Corrections:	<ol style="list-style-type: none"> 1. Mill management to re-brief the boiler operators on the prohibition of empty chemical container usage and provide dedicated container for the boiler ignition activity. 2. The empty chemical container used at boiler station has been transferred to scheduled waste store. 		
Root Cause Analysis:	<ol style="list-style-type: none"> 1. No alternate container was provided for this activity although the boiler operators has been informed not to re-use any empty chemical container. 2. There is no supervision on the operators by Supervisors to ensure compliance to the requirements related to usage of proper containers and waste management. 		
Corrective Actions:	Supervisor to ensure workers comply to this requirements through regular monitoring /supervision and reminders during toolbox meetings.		
Assessment Conclusion:	CAP has been accepted. Evidence of CAP implementation effectiveness to be verified during next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	2532582-202408-I1 <u>Indicator 7.3.1</u> Implementation of waste management plan could be improved further mainly for scrap irons in Tali Ayer Estate and Chersonese Estate as well as mesocarp fibres and decanter cake in Chersonese POM.

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

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2374092-202307-M1	Issued Date	28/07/2023
Due Date	26/10/2023	Closure Date	24/10/2023
Indicator & Category (Critical / Minor)	3.6.1 – Critical		
Statement of Nonconformity:	Risk assessment to identify H&S issues and mitigation plans were not effectively implemented.		
Requirement Reference:	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p>1. Site visit at Chersonese Palm Oil Mill found that there were three (3) workers conducting the painting work. One (1) was painting the floor with anti-rust at Press Station, and the other two were painting the nut bin at Kernel Plant. Further verification found that the paint and chemicals use during the activity were not registered in chemical register and risk assessment of using the paint was not assessed in the Chemical Hazard Risk Assessment (CHRA).</p> <p>2. Noise Risk Assessment (NRA) is available at Chersonese Palm Oil Mill. Based on assessor recommendation at Kernel Plant, the workers need to use double protection of both earplug and earmuff. However, the PPE matrix for kernel plant does not reflect the assessor's recommendation.</p> <p>3. Site visit of harvesting activity at Tali Ayer Estate found that unsafe act and deviation from the Safe Operating Procedure regarding the placement of harvesting pole observed at site.</p> <p>4. Site visit at Holyrood Estate found that the bin attendant was working on arranging the FFB. It was further verified that the work at height activity was assessed in HIRARC with control of PPE such as safety boots, safety helmet and vest. However, there is no proper facilities in preventing the operator from falling observed at site.</p>		

Corrections:	<p><u>Chersonese Mill</u></p> <ol style="list-style-type: none"> 1. Mill had stopped the painting activities for further corrective measures. 2. The workers working in this site have been identified and issued with earplug and earmuff immediately. <p><u>Tali Ayer Estate</u></p> <p>The workers have been immediately briefed and given refresher training related to Standard Operating Procedures (SOP) and Safe Work Procedure (SWP) for harvesters. The mandore has been assigned to constantly remind and monitor workers of the need to place the pole correctly when not in use.</p> <p><u>Holyrood Estate</u></p> <p>FFB attendants have been briefed and reminded of the precautions to be taken and avoid unsafe acts.</p>
Root Cause Analysis:	<p><u>Chersonese Mill</u></p> <ol style="list-style-type: none"> 1. The workers were brief on general PPE requirement to work in the mill but was not specific to painting work as there was no HIRARC or CHRA conducted as this was not a core task but an ad hoc assignment as part of housekeeping. The mill management had overlooked the requirements of the need to assess all activities and ensure it is done before start of any work. 2. The mill management had not referred to the NRA report before preparing the PPE matrix and issuing the appropriate PPE. <p><u>Tali Ayer estate</u></p> <p>The workers are new and did not follow the requirement to put cover at the sickle due to spontaneous interview session. The workers although being briefed are still not fully aware the risk and need of covering the sickle when not in use. The effectiveness of the briefing is inadequate and the mandors, supervisors have not been monitoring and enforcing the requirements consistently.</p> <p><u>Holyrood Estate</u></p> <p>No specific control measure has been put in place for risk of falling although the risk has been identified. The workers are only reminded to be careful from time and time. The mandors and supervisors too have not supervised the activities to reprimand workers from conducting unsafe acts.</p>
Corrective Actions:	<p><u>Chersonese Mill</u></p> <ol style="list-style-type: none"> 1. Mill will conduct: <ol style="list-style-type: none"> a) Mill shall conduct the risk assessment for this activity and discuss in the safety Committee meeting to identify any other activities that could be missed. b) As for the painting, mill has obtained the SDS for reference (evidence item 1), brief any future personnel concerned relating to the utilization of the PPE requirements as stated in the SDS. c) Mill to immediately add on the paint and all other unassessed chemicals into an addendum to the existing. 2. The PPE recommendation as per NRA shall be included into the PPE matrix. (evidence item 3) The mill has assigned the assistant to read the relevant reports and crosscheck with the PPE matrix. This shall be discussed in the next OSH meeting to identify any other potential gaps. <p><u>Tali Ayer Estate</u></p> <p>Daily monitoring can be applied with e-sime+ system and supervision by staff and</p>

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	<p>mandore to ensure all harvesters work with SOP and SWP guidelines & evaluate after training done.</p> <p><u>Holyrood Estate</u></p> <p>Holyrood will conduct:</p> <p>a) There has also been HSE learning from HSE Upstream issued to all OU's dated 14th Aug 2023 on this matter and OU has conduct briefing and training on safe work procedure and to take extra precautions when doing the FFB stacking.</p> <p>b) Daily monitoring will be applied with e-sime+ system and supervision by staff and mandore to ensure all harvesters work with SOP and SWP guidelines & evaluate after training done.</p> <p>c) Evaluate the effectiveness after training done to bin attendant and daily monitoring and supervision by staff/mandore with utilize application of Esime+ system.</p>
Assessment Conclusion:	<p>Major NC Close Out Verification:</p> <p><u>Chersonese POM</u></p> <p>i) Stop work order issued by the management dated 28/7/23 for any painting works until further notice. PPE issuance record was verified for the respective workers. Briefing was given on 3/10/23 for the kernel operator and general workers on NRA and PPE compliance.</p> <p>ii) Risk assessment for painting activity documented in HIRARC dated 19/8/2023 and approved by mill manager. Related issue on risk assessment (HIRARC & CHRA) and PPE compliance discussed in the OHS committee meeting on 21/8/2023.</p> <p>iii) SDS for a few types of paint (Nippon Paint 9000 Aluminium, Mici Metal Oxide Primer) were made available in bi-lingual (English and Bahasa Melayu). Chemical register dated 22/8/23 has updated with the said chemicals.</p> <p>iv) Revisited CHRA carried out in 2023 will include additional activity (painting) as per latest communication dated 7/10/23. The appointed CHRA assessor is from Mohaz Safety, DOSH registration: HQ/22/ASS/00/00059.</p> <p>v) The latest PPE matrix established is based on NRA recommendation and has been discussed in the latest 3rd quarter OSH committee meeting dated 21/8/23.</p> <p><u>Tali Ayer Estate</u></p> <p>i) Briefing and refresher training on SOP and SWP for harvesting was carried out on 5/8/23. Related training attendance, pre and post training evaluation were made available for verification.</p> <p>ii) Daily monitoring of activities in production & non-production area recorded using e-sime+ system as to monitor compliance and non-compliance of PPE, dangerous occurrence, unsafe act and unsafe condition. Verified e-sime+ summary/tracking log for September and October 2023 which has captured compliance and noncompliance issues found in the estate.</p> <p><u>Holyrood Estate</u></p> <p>i) Re-training and briefing to the respective bin attendant was carried out on 28/9/2023. Related training records (attendance list, pre & post training evaluation) were made available for verification.</p> <p>ii) E-sime+ system used to monitor compliance and non-compliance of PPE, dangerous occurrence, unsafe act and unsafe condition in the production and</p>

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	<p>nonproduction area. Verified e-sime+ summary/tracking log for September and October 2023 which has captured compliance and non-compliance issues found in the estate. Issues highlighted in e-sime+ system was discussed in the latest OSH committee dated 20/9/23. Minutes of meeting was made available for verification.</p> <p>iii) HSE Upstream Learning @ lesson learned/knowledge shared communicated on monthly basis as safety newsletter to all OUs. Latest sharing session was carried out on 18/8/23 during master briefing.</p> <p>Implemented correction and corrective action was found to be sufficient to close the major NC on 24/10/2023. Continuous implementation will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p><u>Chersonese POM</u></p> <ul style="list-style-type: none"> • Verified Risk assessment for painting activity documented in HIRARC dated 19/8/2023 and approved by mill manager. Related issue on risk assessment (HIRARC & CHRA) and PPE compliance discussed in the OHS committee meeting on 21/8/2023. • Verified also paint and all other unassessed chemicals has been included in chemical register and will be refer for following year CHRA's assessment. • PPE matrix was established based on NRA recommendation and has been discussed in the OSH committee meeting dated 21/8/23 and 18/11/2023. Workplace inspection conducted at the kernel plant station has included monitoring of complete PPE as per PPE matrix . <p><u>Tali Ayer Estate</u></p> <ul style="list-style-type: none"> • Verified briefing and refresher training on SOP and SWP for harvesting was carried out on 5/8/23 and 15/07/2024. Related training attendance, pre and post training evaluation were made available for verification. Site visit and interview session at harvesting activity at P06 found that harvesters are aware on safety work procedure regards to harvesting pole placement during break time. <p><u>Holyrood Estate</u></p> <ul style="list-style-type: none"> • Sighted training and briefing to all bin attendants were carried out reminding them with SOP and Safe Working Procedure guidelines during working on 28/09/2032 and 22/12/2023. • Evaluation of the training effectiveness done to bin attendant was sighted on the same day of the training which was on 22/12/2023. It was found that all bin attendants understood the training very well. • Observation of bin attendant stacking FFB in their bin at P09B at Bukit Rhona Division was done and found that high precaution has been taken by the bin attendant and strictly monitored by mandore. <p>No recurrence of issue, hence Major NC remained closed.</p>

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

N/A

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1923274-202004-M1	Critical	6.2.3	08/09/2020	Closed out on 08/09/2020
1923274-202004-M2	Critical	3.8.16	08/09/2020	Closed out on 08/09/2020
1923274-202004-M3	Critical	3.8.12 (iii)	08/09/2020	Closed out on 08/09/2020
1923274-202004-M4	Critical	6.7.3	08/09/2020	Closed out on 08/09/2020
1923274-202004-N1	Minor	3.3.2	26/06/2020	Closed out on 02/08/2021
1923274-202004-N2	Minor	6.7.4	26/06/2020	Closed out on 02/08/2021
2087601-202108-M1	Critical	3.4.1	04/08/2021	Closed out on 01/10/2021
2150004-202201-N1	Minor	6.7.2	07/01/2022	Closed out on 29/07/2022
2230351-202207-M1	Critical	3.8.12	29/07/2022	Closed out on 21/10/2022
2230351-202207-M2	Critical	6.2.2	29/07/2022	Closed out on 21/10/2022
2230351-202207-N1	Minor	3.4.2	29/07/2022	Closed out on 28/07/2023
2230351-202207-N2	Minor	2.1.2	29/07/2022	Closed out on 28/07/2023
2230351-202207-N3	Minor	3.3.2	29/07/2022	Closed out on 28/07/2023
2374092-202307-M1	Critical	3.6.1	28/07/2023	Closed out on 24/10/2023
2532582-202408-N1	Minor	3.3.2	09/08/2024	"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 2) - Chersonese 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)
Schools' representatives	- SKDxxx - SMKxxx	Face to face interview
Contractors and sundry shop	- ALxxx - SExxx - MSxxx - SOxxx	Face to face interview
Neighbouring Smallholders and Estate	- HAxxx - PAxxx - ZAxxx	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: Schools</p> <p>Received positive feedback from the schools as the estate management always assisted them when requested. In term of estate student attendance, the school will discuss with the parents and school will visit to the student if required to check on them and wish estate management could assist on the transportation to school. The school hopes that the cooperation can continue.</p>
	<p>Audit Team verification and response:</p> <p>The management always maintain the close relationship with local communities. Any request must be by official letter as mentioned during stakeholder consultation.</p>
2	<p>Feedbacks: Contractors and sundry shop</p> <p>No issues arise, all contractor and supplier were provided with contract agreement and aware on the requirement to comply with standard minimum wages, EPF, SOCSO and the payment received within the stipulated time. The contractor and supplier will meet the manager directly when needed. The sundry shop owner rented the shop from the management with appropriate rate and all the repairs will be covered by the management. The sundry shop was required to give the copy of business licenses and permits to the estate for monitoring.</p>
	<p>Audit Team verification and response:</p> <p>Management will maintain good relationship with contractors and sundry shop.</p>
3	<p>Feedbacks: Neighbouring Smallholders and Estate</p> <p>The smallholders and estate have a good relationship with the management of the estates and mill. There is clear boundary or trenches between estate and neighbouring smallholders/ estate. The smallholders also informed they got permission to used estate road to transport out their FFB. They aware management does not allow to enter the estate on Sunday and will ensure to harvest except on Sunday. Anything they will meet the management.</p>
	<p>Audit Team verification and response:</p> <p>The management always maintain the close relationship with local communities. Any request must be by official letter as mentioned during stakeholder consultation.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
<p>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>					

Previous land owner / user comment	
N/A	<p>Feedbacks: Not applicable as the estates have undergone 2nd cycle of replanting.</p> <p>Audit Team verification and response: Not applicable as the estates have undergone 2nd cycle of replanting.</p>


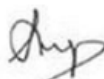
3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Strategic Operating Unit (SOU 2) - Chersonese Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Strategic Operating Unit (SOU 2) - Chersonese Palm Oil Mill is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd. Mokhtar	Name: Shylaja Devi Vasudevan Nair
Company name: BSI Services Malaysia Sdn. Bhd.	Company Name: SD Guthrie Berhad
Title: Client Manager	Title: Head, Sustainability Compliance Unit
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 16/09/2024	Date: 14/10/2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	<p>The management documents that are specified in the RSPO and MSPO are publicly available in the SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) website (Reports, Policies and Statements SD Guthrie) as sighted in the Group Sustainability & Quality Policy Statement 'Kenyataan Dasar Kelestarian & Kualiti Kumpulan'.</p> <p>The company policies, procedures, SDP Charters, Complaints and Grievances Procedure, and Whistleblowing Channel related to sustainability or RSPO/MSPO certification has been explained to the stakeholders during Stakeholders Consultation meeting.</p> <p>Part of the agenda were Introduction of management team, RSPO and MSPO Certifications requirements, Legal requirements, ILO Indicator, Suara KAMI Channel (180018 18771), Whistle Blowing Channel (1800-2233-88), Foreign Workers Employment Procedure (documented and 18 years & above).</p> <p>The information that has been communicated during stakeholders consultation covered the followings:</p> <ol style="list-style-type: none"> 1. Oil Palm relevant matters 2. SD Guthrie Berhad Policies and Charters 	Complied

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		<ul style="list-style-type: none"> 3. Communication and Consultation with Stakeholders 4. Ethical Conduct, Code of Business Conduct (COBC), & Information Giving 5. Introduction to RSPO, MSPO and SCCS Certifications 6. Fire precaution and control measures 7. Compliance on RSPO and MSPO Standard for Outside Crop Purchase (OCP) 8. Force Labour 11 Indicators 9. Provide advice to smallholders in improving best agricultural practices and productivity. 	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The company's policies, sustainability reports, statements and essential procedures published in the company website is in English.</p> <p>SOU 2 certification unit kept documents which made available to the public at each site upon request includes land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. These documents are available in either English or Bahasa Malaysia.</p> <p>The external stakeholder meeting conduct annually as follow:</p> <p><u>Tali Ayer Estate</u></p> <p>The Stakeholder Consultation has been conducted on 05/07/2024 attended by Manager and Assistant Manager of Tali Ayer Estate, TXX Bxxn Sxxxi, SXXX Lxxxxg Sxxxxi Bxxk, Main Division Temple, Ladang Sxxxxi Rxxa, Rxxn Exxxxxxr, SD Ixxxxxxl, MXX, Kxxn Hxxxxxe, JXXX Sxxxxi Bxxk, JXXX Sg Sxxxxg, etc.</p>	Complied

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		<p><u>Chersonese Palm Oil Mill and Chersonese Estate</u></p> <p>The Stakeholder Consultation has been conducted on 24/06/2024 attended by Manager and Assistant Manager of Chersonese Palm Oil Mill and Chersonese Estate, Kedai Runcit Ah Cxxxg, Kampung Hxxi Txxb, Kampung Nxxxxg Hxxxxs, Kampung Kxxxa Gxxa, contractors, vendors and smallholders such as Sxxxxxh Dxxxn, Axxxn Jxxxxr, Yxxw Bxx Sxxx, Gxxxxn Oxxxn Maxxxe Sdn Bhd, Gxh Hxr Jxn, etc.</p> <p><u>Holyrood Estate</u></p> <p>The Stakeholder Consultation has been conducted on 19/07/2024 attended by Manager and Assistant Manager of Holyrood Estate, SK RTBK Pxxxxk Txxxxxg, SMK Kxxu Gxxxh, JS Axxs Mxxu Exxxxxe, Axxa Kxxxn, Bxxxi Pxxxs Sxxxxa, Ladang Hxxxxxxa, JPKK RXXX, IXXX Enterprise, Kxxxxk Kxxxxxxn Sxxxxa, etc.</p> <p>Training to workers on company policies and procedures:</p> <p><u>Tali Ayer Estate</u></p> <p>17/01/2024 – briefing on Employment Act, Minimum Wages Order, 11 ILO indicators, employment contract, grievance channel, pay slip, VIP & COBC, OPP, PPE, HRC & HRDF and Policy of SD Guthrie Berhad.</p> <p><u>Chersonese Estate</u></p> <ol style="list-style-type: none"> 1. Refresher on ergonomic management during work, ILO Compliance, Suara Kami and whistleblowing channel including Esime for safety – 11/09/2023 and 13/02/2024 2. OPP – 15/09/2023 	
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		<p>3. Social Dialogue – 19/09/2023</p> <p>4. Freedom of Movement – 25/09/2023</p> <p>5. Briefing on PPE – 02/10/2023</p> <p>6. Sexual Harassment Policy – 06/01/2023</p> <p>7. 11 Indicator ILO, Visa and Grievance Channel – 26/11/2023</p> <p>8. OPP as medium for housing grievances and complaints – 02/01/2024</p> <p><u>Holyrood Estate</u></p> <p>13/01/2024 (Main Div) and 17/01/2024 (Bukit Rhona Div). Refresher briefing on ILO Indicators, passport safe keeping, social dialogue, medical access, OSH, freedom of movement, housing OPP, grievance channel, wages structure, physical and sexual abuse, HRDF, COBC and employment contract.</p>	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>The management has maintained the request for any information by external and internal stakeholders in 'Communication & Consultation File'. Review on the file sighted the external stakeholders feedback form. SOU 2 managements acquired all feedback form during external stakeholder meeting to response accordingly on any feedback and request. The external stakeholder meeting conduct annually as follow:</p> <p><u>Tali Ayer Estate</u></p> <p>The Stakeholder Consultation has been conducted on 05/07/2024 attended by Manager and Assistant Manager of Tali Ayer Estate, TXX Bxxn Sxxxi, SXXX Lxxxxg Sxxxxi Bxxk, Main Division Temple, Ladang Sxxxxi Rxxa, Rxxn Exxxxxxr, SD Ixxxxxxl,</p>	Complied

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		<p>MXx, Kxxn Hxxxxxxe, JXXX Sxxxxi Bxxk, JXXX Sg Sxxxxg, etc.</p> <p><u>Chersonese Palm Oil Mill and Chersonese Estate</u></p> <p>The Stakeholder Consultation has been conducted on 24/06/2024 attended by Manager and Assistant Manager of Chersonese Palm Oil Mill and Chersonese Estate, Kedai Runcit Ah Cxxg, Kampung Hxxi Txxb, Kampung Nxxxxg Hxxxxs, Kampung Kxxa Gxxa, contractors, vendors and smallholders such as Sxxxxxh Dxxn, Axxn Jxxxxr, Yxxw Bxx Sxxx, Gxxxxn Oxxn Maxxxe Sdn Bhd, Gxh Hxr Jxn, etc.</p> <p><u>Holyrood Estate</u></p> <p>The Stakeholder Consultation has been conducted on 19/07/2024 attended by Manager and Assistant Manager of Holyrood Estate, SK RTBK Pxxxxk Txxxxg, SMK Kxxu Gxxh, JS Axxs Mxxu Exxxxxe, Axxa Kxxn, Bxxi Pxxs Sxxxxa, Ladang Hxxxxxa, JPKK RXXX, IXXX Enterprise, Kxxxxk Kxxxxxxn Sxxxxa, etc.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>The management has established Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/04/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estate. Appendix 5 Flowchart and Procedure on Handling in Social Issues, Ver 1, Year 2008, Issue No.1 Issue date 1.4.2008.</p> <p>Timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation.</p>	Complied

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		<p>Review on the procedure, describes estate manager as person in-charge and responsible to address the communication and requests from internal and external.</p> <p>The management also has established Whistle Blowing Policy (GPA No. B5) dated 29.08.2019. The key objective of this policy is to provide an internal mechanism or reporting, investigation, and remedying:</p> <ol style="list-style-type: none"> i. Any wrongdoing ii. Grievance with Wrongdoing elements as defined in Clause 4.3. Through this GPA, Directors, Employees, Counterparties and Business Partners should be reassured that they are able to raise genuine concerns in good faith without fear of reprisals or retaliation. <p>Freedom in making grievance/complaint to solve any issues at workplace or worker quarters and no action will be stressed against the complainer or person who making grievances. There are few mediums such as:</p> <ol style="list-style-type: none"> 1. Suara Kami <ul style="list-style-type: none"> • 7 languages operator • Third party – independent • Confidentiality • Call 1800818771 or text 01130116031 or via Facebook messenger. 2. Whistle Blowing <ul style="list-style-type: none"> • Free 	
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		<ul style="list-style-type: none"> • Identity being secretly protected • Independent party • Call 1800223388 • WhatsApp 019 2797553 • Email: whistleblowing@sdguthrie.com <p>3. 'Oil Palm Pal' (OPP) – barcode for housing repairs</p> <p>As confirmed through interview, the procedure has been disseminated to external stakeholder during stakeholder consultation that has been conducted on:</p> <p><u>Tali Ayer Estate</u></p> <p>The Stakeholder Consultation has been conducted on 05/07/2024 attended by Manager and Assistant Manager of Tali Ayer Estate, TXX Bxxn Sxxxi, SXXX Lxxxxg Sxxxxi Bxxk, Main Division Temple, Ladang Sxxxxi Rxxa, Rxxn Exxxxxxr, SD Ixxxxxxl, MXX, Kxxn Hxxxxxe, JXXX Sxxxxi Bxxk, JXXX Sg Sxxxxg, etc.</p> <p><u>Chersonese Palm Oil Mill and Chersonese Estate</u></p> <p>The Stakeholder Consultation has been conducted on 24/06/2024 attended by Manager and Assistant Manager of Chersonese Palm Oil Mill and Chersonese Estate, Kedai Runcit Ah Cxxg, Kampung Hxxi Txxb, Kampung Nxxxxg Hxxxs, Kampung Kxxa Gxxa, contractors, vendors and smallholders such as Sxxxxh Dxxn, Axxn Jxxxxr, Yxxw Bxx Sxxx, Gxxxxn Oxxn Maxxxe Sdn Bhd, Gxh Hxr Jxn, etc.</p>	
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		<p><u>Holyrood Estate</u></p> <p>The Stakeholder Consultation has been conducted on 19/07/2024 attended by Manager and Assistant Manager of Holyrood Estate, SK RTBK Pxxxxk Txxxxxg, SMK Kxxu Gxxxh, JS Axxs Mxxu Exxxxxe, Axxa Kxxn, Bxxi Pxxs Sxxxxa, Ladang Hxxxxxa, JPKK RXXX, IXXX Enterprise, Kxxxxk Kxxxxxxn Sxxxxa, etc.</p> <p>Training to workers on company policies and procedures:</p> <p>Tali Ayer Estate – 17/01/2024 – briefing on Employment Act, Minimum Wages Order, 11 ILO indicators, employment contract, grievance channel, pay slip, VIP & COBC, OPP, PPE, HRC & HRDF and Policy of SD Guthrie.</p> <p><u>Chersonese Estate</u></p> <ol style="list-style-type: none"> 1. Refresher on ergonomic management during work, ILO Compliance, Suara Kami and whistleblowing channel including Esime for safety – 11/09/2023 and 13/02/2024 2. OPP – 15/09/2023 3. Social Dialogue – 19/09/2023 4. Freedom of Movement – 25/09/2023 5. Briefing on PPE – 02/10/2023 6. Sexual Harassment Policy – 06/01/2023 7. 11 Indicator ILO, Visa and Grievance Channel – 26/11/2023 8. OPP as medium for housing grievances and complaints – 02/01/2024 <p><u>Holyrood Estate</u> – 13/01/2024 (Main Div) and 17/01/2024 (Bukit Rhona Div). Refresher briefing on ILO Indicators, passport safe</p>	
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		keeping, social dialogue, medical access, OSH, freedom of movement, housing OPP, grievance channel, wages structure, physical and sexual abuse, HRDF, COBC and employment contract.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	The mill and estates have maintained the List of Stakeholders FY 2024 includes categorized as Contractors, Vendors/Suppliers, Local Community and Other Interested Parties (Government Agencies, School, Hospitals, Balai Polis, Village, OCP, NGO, etc.). Evident the records of action taken in response to input from stakeholders such as type of contribution to community, permission for using estate roads, etc.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	As sighted in the Group Sustainability & Quality Policy Statement 'Kenyataan Dasar Kelestarian & Kualiti Kumpulan' approved by Mohamad Helmy Othman Basha, Group Managing Director dated 02.12.2019. The company committed in Promoting Good Governance and Transparency: <ol style="list-style-type: none"> 1. Instilling a culture of integrity 2. Abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC) 3. Complying to all legal and other requirements in countries we operate 4. Embedding sustainability & quality risks into operational and decision-making processes 5. Ensuring supply chain traceability 6. Publicly reporting sustainability performance The Ethical Conduct, Code of Business Conduct (COBC), &	Complied

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		<p>Information Giving has been implemented in all business operations and transaction (which include recruitment and contracts) and has been disseminated during stakeholder consultation:</p> <p><u>Tali Ayer Estate</u> The Stakeholder Consultation has been conducted on 05/07/2024 attended by Manager and Assistant Manager of Tali Ayer Estate, TXB Bxxn Sxxi, SXXX Lxxxxg Sxxxxi Bxxk, Main Division Temple, Ladang Sxxxxi Rxxa, Rxxn Exxxxxxxr, SD Ixxxxxxl, MXX, Kxxn Hxxxxxxe, JXXX Sxxxxi Bxxk, JXXX Sg Sxxxxg, etc.</p> <p><u>Chersonese Palm Oil Mill and Chersonese Estate</u> The Stakeholder Consultation has been conducted on 24/06/2024 attended by Manager and Assistant Manager of Chersonese Palm Oil Mill and Chersonese Estate, Kedai Runcit Ah Cxxg, Kampung Hxxi Txxb, Kampung Nxxxxg Hxxxxs, Kampung Kxxa Gxxa, contractors, vendors and smallholders such as Sxxxxh Dxxn, Axxn Jxxxxr, Yxxw Bxx Sxxx, Gxxxxn Oxxn Maxxxe Sdn Bhd, Gxh Hxr Jxn, etc.</p> <p><u>Holyrood Estate</u> The Stakeholder Consultation has been conducted on 19/07/2024 attended by Manager and Assistant Manager of Holyrood Estate, SK RTBK Pxxxxk Txxxxg, SMK Kxxu Gxxh, JS Axxs Mxxu Exxxxxe, Axxa Kxxn, Bxxi Pxxs Sxxxxa, Ladang Hxxxxxa, JPKK RXXX, IXXX Enterprise, Kxxxxk Kxxxxxxn Sxxxxa, etc.</p>	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	The management also has established Whistle Blowing Policy (GPA No. B5) dated 29.08.2019. The key objective of this policy is to	Complied

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	<p>- Minor compliance -</p>	<p>provide an internal mechanism or reporting, investigation, and remedying:</p> <ol style="list-style-type: none"> 1. Any wrongdoing 2. Grievance with Wrongdoing elements as defined in Clause 4.3. Through this GPA, Directors, Employees, Counterparties and Business Partners should be reassured that they are able to raise genuine concerns in good faith without fear of reprisals or retaliation. <p>All contractors are required to fulfil requirements as per Vendor Integrity Pledge (VIP). There are two components of the VIP:</p> <ol style="list-style-type: none"> 1. Vendor Code of Business Conduct (VCOBC) which outlines standard of behaviour relating to: <ul style="list-style-type: none"> - Labour and Human Rights - Environment, Safety and Health - Ethics and Management Practices 2. All applicable laws and regulations <p>Evident the following contractor has signed the Vendor Integrity Pledge and acknowledgement on agreement that all legal obligations requirements by RSPO/MSPO/SCCS:</p> <ol style="list-style-type: none"> 1. Bxxn Sxxxk Enterprise signed on 15/07/2024 2. Oxxs Enterprise signed on 02/01/2024 3. Sxxxxn PX Enterprise signed on 25/07/2024 4. MXG Enterprise signed on 01/06/2024 5. Rxxn Exxxxxxxr Contractor Sdn Bhd signed on 01/06/2024 6. Axxa Kxxn Enterprise signed on 23/07/2024 	
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Principle 2: Operate legally and respect rights																		
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.																		
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) diligently monitored compliance with permits and licenses, with oversight from the operating units and the sustainability team.</p> <p>Respective operating units will undertake the responsibility of identifying, managing, updating, and tracking the legal requirement as well as monitoring the status of legal compliance. Refer to SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad), ESH Management System Manual, ESH Legal & Other Requirements; Guidelines and Procedures; Document ID: SD/SDP/SQM (ESH)/001-2-2; Revision: 0. Date: 01/07/2012.</p> <p><u>Tali Ayer Estate</u></p> <table><tr><th>License / Permit</th><th>Reference</th><th>Validity Date</th></tr><tr><td>MPOB License</td><td>621037002000</td><td>31/05/2025</td></tr><tr><td>Permit Barang Kawalan Berjadual – Diesel (Euro 2M)</td><td>PBKB/2023/P/A-000006</td><td>30/12/2025</td></tr><tr><td>DOSH Permit (Air Compressor Receiver)</td><td>PK- PMT 512</td><td>07/08/2024</td></tr><tr><td>Weighbridge Calibration</td><td>B417533753</td><td>11/10/2024</td></tr></table>	License / Permit	Reference	Validity Date	MPOB License	621037002000	31/05/2025	Permit Barang Kawalan Berjadual – Diesel (Euro 2M)	PBKB/2023/P/A-000006	30/12/2025	DOSH Permit (Air Compressor Receiver)	PK- PMT 512	07/08/2024	Weighbridge Calibration	B417533753	11/10/2024	Complied
License / Permit	Reference	Validity Date																
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Permit Barang Kawalan Berjadual – Diesel (Euro 2M)	PBKB/2023/P/A-000006	30/12/2025																
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Weighbridge Calibration	B417533753	11/10/2024																

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		<u>Chersonese Estate</u>			
		License / Permit	Reference	Validity Date	
		MPOB License	526593002000	31/01/2025	
		Permit Barang Kawalan Berjadual – Diesel (Euro 2M)	PKPB/2024/P/A-000004	30/12/2026	
		DOSH Permit (Air Compressor Receiver)	PK PMT 7992	04/05/2025	
		<u>Chersonese Palm Oil Mill</u>			
		License / Permit	Reference	Validity Date	
		MPOB License	533667104000	31/10/2024	
		Permit Barang Kawalan Berjadual – Diesel (Euro 2M)	PKPB/2023/P/A-000264	13/12/2024	
		Air Compressor Receiver	PK PMT 82467	09/09/2025	
		Sterilizer 1	PK PMT 576	09/09/2025	
		Sterilizer 2	PK PMT 577	09/09/2025	

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		Boiler No. 3	PK PMD 80569	09/09/2025	
		Thermal Deaerator	PK PMT 80880	09/09/2025	
		Jadual Pematuhan Alam Sekitar	006275	30/06/2025	
		Lesen bagi Pepasangan Persendirian	61139	05/04/2025	
		Weighbridge Calibration	B829135378	09/01/2025	
		License / Permit	Reference	Validity Date	
		MPOB License	530733002000	30/06/2025	
		Permit Barang Kawalan Berjadual – Diesel (Euro 2M)	PKB/2023/P/A-000189	06/11/2026	
		Air Compressor Receiver	PK PMT 1217	11/12/2024	
<u>Holyrood Estate</u>					
<u>Kalumpong Estate</u>					

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		License / Permit	Reference	Validity Date	
		MPOB License	524392002000	31/10/2024	
		Permit Barang Kawalan Berjadual – Diesel (Euro 2M)	PBKB/2024/B/A-000008	14/12/2024	
		Air Compressor Receiver	PMT 115519	09/11/2024	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) diligently monitored compliance with permits and licenses as per ESH Management System Manual, ESH Legal & Other Requirements; Guidelines and Procedures; Document ID: SD/SDP/SQM (ESH)/001-2-2; Revision: 0. Date: 01/07/2012.</p> <p>All legal requirements were documented in Legal and Other Requirement Register available at the estates. The register is reviewed regularly and updated as and when there are new or amended legal requirements that are applicable to the estate operations. The latest review was conducted on 02/04/2024 for all estates which are Federal Government Gazette- Occupational Safety & Health (Amendment) Act 2022 and Factories & Machinery (Repeal) Act 2022. Other examples of legal register are:</p> <ul style="list-style-type: none"> • Occupational Safety & Health Act 1994 • Pesticide Act 1974 • Petroleum (Safety Measures) Act 1984 • Environment Quality Act 1974 			Complied

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		<ul style="list-style-type: none">• Sewage Service Act 1993• Waters Act 1920• Employment Act 1955• Holiday Act 1951• Workers Union Act 1959• Electrical Supply Act 19902												
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>All estates maps clearly showing the estates boundary while. Chersonese Palm Oil Mill’s border marked through the fencing of the mill area.</p> <p>The demarcation at all estates was by using concrete pegging and boundary trenching. Site visit confirmed at P14C (Tali Ayer Estate), P22B (Chersonese Estate), P10B (Holyrood Estate) and P14D (Kalumpong Estate) that boundary packs (Red Poled) available along the perimeter boundary. There was no evidence of plantings beyond the perimeter boundary as verified during the site visit at the boundary area.</p> <p>Verified location of boundary stone location as per table below:</p> <table><tr><th>Estate</th><th colspan="2">Location</th></tr><tr><td rowspan="2">Tali Ayer Estate</td><td>5.048599</td><td>100.515739</td></tr><tr><td>5.020045</td><td>200.536606</td></tr><tr><td>Chersonese Estate</td><td>4.986752</td><td>100.480056</td></tr></table>	Estate	Location		Tali Ayer Estate	5.048599	100.515739	5.020045	200.536606	Chersonese Estate	4.986752	100.480056	Complied
Estate	Location													
Tali Ayer Estate	5.048599	100.515739												
	5.020045	200.536606												
Chersonese Estate	4.986752	100.480056												

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		Holyrood Estate	5.125219	100.706632	
		Kalumpang Estate	4.971177	100.608325	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.					
2.2.1	A list of contracted parties is maintained. - Minor compliance -	SOU 2 certification unit management has maintained a list of contracted parties, which is documented in the verified List of Stakeholders 2024. This list includes Local Community Heads, Neighbours, Local Authorities, Union Associations, Foreign Country Embassies, and Vendors (Contractors & Suppliers).			Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	<p>All contracted parties/vendors are required to sign the Vendor Integrity Pledge (VIP) as a fundamental part of their contractual obligations. This pledge ensures their commitment to adhering to all applicable laws and regulations, particularly those related to anti-bribery, fraud, and corruption. Furthermore, vendors must comply with the Vendor Code of Business Conduct (VCOBC), which encompasses a broad range of ethical standards and practices. This includes upholding labor rights and human rights, ensuring fair treatment of all workers, and maintaining a safe and respectful working environment. By signing the VIP and adhering to the VCOBC, vendors affirm their dedication to maintaining integrity and ethical conduct in all aspects of their business operations.</p> <p>Examples of contractor parties at each site as below</p> <ul style="list-style-type: none"> • Tali Ayer Estate – OXXX Enterprise & AXXX KXXXX Enterprise • Chersonese Estate – BXXXX SXXXX Enterprise, RXXXX EXXXXXXXX, JX AXXX MXXX Enterprise • Chersonese POM – HXX YXX Enterprise, & MXX Enterprise • Holyrood Estate – AXXX KXXXX Enterprise 			Complied

		<ul style="list-style-type: none"> Kalumpong Estate – JXX RXX Enterprise, JX AXXX MXXX Enterprise and BXXXX SXXXXX Enterprise 	
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>All contracted parties/vendors are required to sign the Vendor Integrity Pledge (VIP) and Vendor Code of Business Conduct (VCOBC as a fundamental part of their contractual obligations. This pledge ensures their commitment to adhering to all applicable laws and regulations, which includes restriction of child labour & protecting the rights of children.</p> <p>Based on database of contractor's workers and interview session, no children were found to be employed by contractors.</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> Information on geo-location of FFB origins Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>For directly sourced FFB, detailed information about third-party FFB suppliers is meticulously documented and maintained. This includes contract agreements that outline the terms and conditions of the supply, MPOB licenses that verify the suppliers' compliance with regulatory standards, and location maps complete with GPS coordinates to accurately identify the sourcing locations. Additionally, evidence of ownership is also kept, ensuring transparency and traceability in the supply chain. All this information is systematically organized and stored in specific FFB supplier files.</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>It was found that Chersonese POM received FFB from 2 indirect sourced which are CXX Smart and SX FXXXXXX. Compilation of data for indirectly FFB resourced was still in progress. Nevertheless, as per RSPO Announcement dated 15 February 2022 on Interim Measure for Fulfilment of Indicator 2.3.2 of the 2018 RSPO Principles & Criteria — On Legality of Indirect FFB Supplies, SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has submitted the indicator 2.3.2 Case Register to RSPO</p>	Complied

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		as per communication email dated 11/11/2022 and acknowledge and registered into the system by RSPO Secretariat as per communication email dated 24/11/2022.	
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>All estates have established yearly financial budget for their Capital Expenditure (CAPEX) and Operation Expenditure (OPEX) which detailing their allocation for details as below:</p> <ul style="list-style-type: none"> • FFB projection from each block • Income and expenditure • Sundry Revenue • Operation Cost • Capital Expenditures • General Charges • Hectarage Statement <p>On the other hand, the business plan for the mill is reflected in the form of an annual budget (MPLAN) and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p> <ul style="list-style-type: none"> • Mill intake – FFB input • Production of CPO • Production of PK • Total Palm Oil Extraction • Total Palm Kernel Extraction • Mill cost 	Complied

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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	<div>The estates have established the replanting plan. The plan is as the following:</div> <table><tr><td>Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Tali Ayer Estate</td><td>174.09</td><td>253.37</td><td>179.73</td><td>282.60</td><td>218.44</td></tr><tr><td>Chersonese Estate</td><td>58.45</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>Holyrood Estate</td><td>-</td><td>17.79</td><td>-</td><td>37.49</td><td>-</td></tr><tr><td>Kalumpo ng Estate</td><td>166.03</td><td>171.47</td><td>166.78</td><td>204.95</td><td>128.38</td></tr></table>	Estate	2024	2025	2026	2027	2028	Tali Ayer Estate	174.09	253.37	179.73	282.60	218.44	Chersonese Estate	58.45	-	-	-	-	Holyrood Estate	-	17.79	-	37.49	-	Kalumpo ng Estate	166.03	171.47	166.78	204.95	128.38	Complied
Estate	2024	2025	2026	2027	2028																												
Tali Ayer Estate	174.09	253.37	179.73	282.60	218.44																												
Chersonese Estate	58.45	-	-	-	-																												
Holyrood Estate	-	17.79	-	37.49	-																												
Kalumpo ng Estate	166.03	171.47	166.78	204.95	128.38																												
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	<div>Each operating unit within the Chersonese Palm Oil Mill supply bases has conducted a Management Review, which includes discussions on the results of internal audits, customer feedback, process performance and product conformity, the status of preventive and corrective actions, changes that could affect the management system, and any recommendations for improvement. Details of management review meeting was reviewed as table below:</div> <table><tr><td>Estate</td><td>Date</td></tr><tr><td>Tali Ayer Estate</td><td>20/07/2024</td></tr><tr><td>Chersonese Estate</td><td>14/05/2024</td></tr><tr><td>Chersonese POM</td><td>13/05/2024</td></tr><tr><td>Holyrood Estate</td><td>28/05/2024</td></tr><tr><td>Kalumpo ng Estate</td><td>22/06/2024</td></tr></table>	Estate	Date	Tali Ayer Estate	20/07/2024	Chersonese Estate	14/05/2024	Chersonese POM	13/05/2024	Holyrood Estate	28/05/2024	Kalumpo ng Estate	22/06/2024	Complied																		
Estate	Date																																
Tali Ayer Estate	20/07/2024																																
Chersonese Estate	14/05/2024																																
Chersonese POM	13/05/2024																																
Holyrood Estate	28/05/2024																																
Kalumpo ng Estate	22/06/2024																																

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Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Evident the Social Impact Assessment (SIA) Report for SOU 2 certification unit that covered operating units such as Chersonese Palm Oil Mill, Chersonese Estate, Kalumpong Estate and Tali Ayer Estate. The assessment has been carried out between 14 to 17/06/2015 by Sustainability Strategy Unit, PSQM Department.</p> <p>Evident also the Social Impact Assessment (SIA) Report for SOU 1 Sungai Dingin that covered operating units such as Sungai Dingin POM, Sungai Dingin Estate, Holyrood Estate, etc. The assessment has been carried out between 23/02/2015 to 05/03/2015 by Sustainability Strategy Unit, PSQM Department.</p> <p>No 6: This chapter summarizes the development processes of each operating unit, which is a key aspect to recognize in terms of the SIA, to be able to understand the impacts on the social communities and other stakeholders and the causes of conflicts. In the context of this scoping assessment, it is also important to understand the cultural and social setting in which SOU 2 certification unit is operating. An understanding of the of the background of the communities.</p> <p>The current social impact assessment was identified through social management plan such as annual stakeholder meeting, social dialogue with workers, workers welfare committee meeting, union meeting, gender committee meeting, etc. Furthermore, if there is new activities and operations, the management will conduct SIA as below:</p>	Complied

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		<p><u>Tali Ayer Estate</u></p> <p>Evident the Addendum Social Impact Assessment (SIA) on Replanting Activity for Tali Ayer Estate, Sungai Krian Division dated 29/02/2024:</p> <ol style="list-style-type: none"> 1. 28/02/2024 – briefing to all workers during morning muster on the replanting activity. Information gathering on concerns from workers. All workers understood the briefing and some suggestion for improvement was provided by representative for each job scope. No issue raised by external stakeholder representative. <p><u>Chersonese Estate</u></p> <p>Evident the Addendum Social Impact Assessment (SIA) on Replanting Activity for Chersonese Estate, Jin Seng Division dated 01/06/2024:</p> <ol style="list-style-type: none"> 1. 25/05/2024 – replanting kick off meeting. 2. 04/06/2024 – briefing to all workers on replanting activity at field 2024B. 3. 10/06/2024 - Survey form was distributed to harvester. 4. 24/06/2024 – Briefing to stakeholders on replanting activity during stakeholder meeting. 5. No issue raised by workers and stakeholders <p><u>Kalumpong Estate</u></p> <p>Evident the Addendum Social Impact Assessment (SIA) on Replanting Activity for Kalumpong Estate dated 12/01/2024:</p> <ol style="list-style-type: none"> 1. 10/01/2024 – replanting kick off meeting - replanting at 	
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		<p>field 2001B and 2002A.</p> <ol style="list-style-type: none"> 15/01/2024 – briefing to all workers on replanting activity. Finding and recommendation action: All workers understood the briefing given by the management team on replanting activity and no concern raised by workers as replanting activity is a normal occurrence in the estate and no action plan is required. External Stakeholders involved – SJK Txxxi Lxxxxg Kxxxxxxxg, SK Dxxx Mxxxxd and Kxxi Srx Txxxxxxxixi Axxn, replanting contractor. <p>The management has established the Social Management Plan FY 2024 and summarised as below:</p> <ol style="list-style-type: none"> Internal <ul style="list-style-type: none"> - Impact of social dialogue meeting to all workers - Improvement of housing amenities & facilities - Gender committee - SIA report - Suara kami - Whistleblowing External <ul style="list-style-type: none"> - Stakeholders' platform - External contribution (CSR) - Overtime issues <p>Evident and sampled during the audit, the social management</p>	
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		<p>plan has been implemented as mentioned as per indicator.</p> <p>For environmental, this has been established in the Continuous Improvement Plan 2024 updated in Jan 2024 respectively for both the Mill and Estate. This compilation was made with subject to the consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments maintained available. Among the documents were:</p> <ul style="list-style-type: none"> - Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers. - Environmental Improvement Plan 2024 - Pollution Prevention Plan 2024 - Water Management Plan. 2024 - Waste Management Plan 2024 <p>The Continuous Management Plan 2023 for the estate/mill operations established as Lean Six Sigma Harvested Benefits include the following:</p> <ul style="list-style-type: none"> - To reduce water consumption - To reduce electricity consumption - Road maintenance programme 	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].	<p>SOU 2 completed their RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. The input data was found to be accurate based on the following records verification:</p> <ul style="list-style-type: none"> - SAP production database/accounting system 	Complied

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	<p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<ul style="list-style-type: none"> - Land titles - Complaints & grievance records - Dept. of Safety & Health's JKPP8 form 	
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) for all operation in estate and mill are available during the audit. Generally, SD Guthrie Berhad has formulated Agricultural Reference Manual (ARM), 3rd Edition in December 2023, Sustainability Plantation Management System and EQMS (Estate Quality Management System) for operation guidance to all their estates and mills. Among critical SOP as listed below:</p> <ul style="list-style-type: none"> • Estate Clinic Periodic Inspection, Doc. No. UM/HSE/SP/09, Edition 2024 • Permit To Work (PTW), Doc. No. UM/HSE/OCP/13, Edition 2023 • e-SIME+ System Procedure, Doc. No. UM/HSE/OCP/12, Edition 2023 • Safe Handling & Storage of Petrol at Employees' Housing Procedure, Doc. No. UM/HSE/OCP/15, Edition 2023 • Forced Labour Prevention Validation Procedure, Doc. No. UM/SWS/SOP/01, Edition 2023 • Incidents, Accidents and Non-Compliance Management Procedures, Doc. No. UM/HSE/SP/03, Edition 2022 • Workers Housing Management Procedure, Edition 2022 • Health, Safety & Environment Management System (HSEMS) Manual, Doc No. UM/HSE/MS/01, Edition 2021 	Complied

		<ul style="list-style-type: none"> • Safe Harvesting Procedure, Doc. No. UM/HSE/OCP/02, Edition 2021 • Personal Protective Equipment (PPE), Doc. No. UM/HSE/OCP/03, Edition 2021 • Emergency Preparedness & Response Procedures, Doc. No. UM/HSE/SP/02 • OSH Risk Management Procedure, UM/HSE/SP/01, Edition 2021 • Managing Occupational Safety and Health (Noise Exposure) Regulation 2019 Compliance, Doc. No. UM/HSE/SP/06 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>There are various mechanism and methods for SD Guthrie to monitor estates and mills implementation accordingly. Among the program but not limited to are:</p> <ul style="list-style-type: none"> • Estate Structured Crop Recovery Assessment (SCRA); Crop Losses & Crop Quality which is a scoring system for evaluate performance of each Operating Unit.: • Fly by Visit by Headquarters and Region Office for monitoring of safety, infrastructure and culture element in mill and estates. • Structured Estate Performance Assessment (SEPA) by Performance Monitoring Unit which focusing on Immature Management, Nursery Management, Manuring Management, Building & Facilities Management, EVIT, Ex-estate Cost Assessment • Agronomic Highlights and Fertiliser Visit by Agronomist • Structured Oil Recovery Assessment (SORA) by Performance Monitoring Unit for palm oil mill • Monthly Crop Recovery Assessment, for January to July 2024 	Non-compliance

		<p><u>Chersonese POM</u></p> <p>An empty chemical container used for the boiler (NALCO 19 PULV Oxygen Scavenger) was found placed in front of the boiler station. It was observed that the container contained a certain amount of diesel. During an interview, the boiler operator confirmed that diesel is used each time he conducts boiler ignition. This practice is in violation of the SDG’s Waste Management Procedure for Upstream Malaysia, Document ID. SD/SDP/GSD/HSE/0522/01, clause 4.2, which states that scheduled waste categorized under List 2 must be disposed of in accordance with the Environment Quality Act 1974, the Environment Quality (Scheduled Waste) Regulation 2005, as well as the waste management plan.</p> <p>Hence, minor non-conformity was raised</p>											
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>There are various mechanism and methods for SD Guthrie to monitor estates and mills implementation accordingly. Among the program but not limited to are:</p> <ul style="list-style-type: none">Estate Structured Crop Recovery Assessment (SCRA); Crop Losses & Crop Quality which is a scoring system for evaluate performance of each Operating Unit. Details of visit by Performance Monitoring Unit (PMU) as table below: <table><tr><td>Estate</td><td>Date of visit</td></tr><tr><td>Tali Ayer Estate</td><td>21/05/2024</td></tr><tr><td>Chersonese Estate</td><td>23/05/2024</td></tr><tr><td>Holyrood Estate</td><td>14/06/2024</td></tr><tr><td>Kalumpang Estate</td><td>22/05/2024</td></tr></table>	Estate	Date of visit	Tali Ayer Estate	21/05/2024	Chersonese Estate	23/05/2024	Holyrood Estate	14/06/2024	Kalumpang Estate	22/05/2024	Complied
Estate	Date of visit												
Tali Ayer Estate	21/05/2024												
Chersonese Estate	23/05/2024												
Holyrood Estate	14/06/2024												
Kalumpang Estate	22/05/2024												

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		<ul style="list-style-type: none"> • Fly by Visit for safety and infrastructure monitoring purpose at mill on 24/04/2024 (Tali Ayer Estate), 25/04/2024 (Chersonese Estate), 23/04/2024 (Holyrood Estate), and 25/04/2024 (Kalumpang Estate) • Structured Estate Performance Assessment (SEPA) by Performance Monitoring Unit which focusing on Immature Management, Nursery Management, Manuring Management, Building & Facilities Management, EVIT, Ex-estate Cost Assessment • Structured Oil Recovery Assessment (SORA) by Performance Monitoring Unit for palm oil mill, dated 20-24/05/2024. • Monthly Crop Recovery Assessment, for Jan – May 2024 • In term of sustainability, there were RSPO & MSPO internal audit has been conducted by Sustainable Compliance Unit, Group Sustainability Department on 06/05/2024 for Tali Ayer Estate, Chersonese Estate for 09/05/2024, Chersonese POM on 07/04/2024, Holyrood Estate on 10/05/2024 and at Kalumpang Estate on 08/05/2024. 	
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	<p>There are no new plantings or operations within SOU2 Chersonese POM. The Addendum SIA on replanting activity has been carried out for related estates.</p> <p>Based on the Social Impact Assessment (SIA) Report for SOU 2 certification unit under chapter No 6: This chapter summarizes the development processes of each operating unit, which is a key aspect to recognize in terms of the SIA, to be able to understand</p>	Complied

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the impacts on the social communities and other stakeholders and the causes of conflicts. In the context of this scoping assessment, it is also important to understand the cultural and social setting in which SOU 2 certification unit is operating. An understanding of the of the background of the communities.

The current social impact assessment was identified through social management plan such as annual stakeholder meeting, social dialogue with workers, workers welfare committee meeting, union meeting, gender committee meeting, etc.

For environmental aspects of existing operations, the assessments documented as per Environmental Impact Evaluation and Environmental Impact Assessment Annual Review Form 2024 with Code for Environmental Impact as following:

Code	Impact	Code	Impact
1	Ozone layer depletion	6	Unpleasant work environment
2	Global warming	7	Depletion of natural resource
3	Air pollution	8	Community impact
4	Water pollution	9	Business impact
5	Land contamination		

Sample evaluation matrix as following:

Criteria	Weightage	Operating Condition		
		Normal	Abnormal	Emergency
Frequency	30	3	-	-

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		<table><tr><td>Extent of impact</td><td>40</td><td>1</td><td>-</td><td>-</td></tr><tr><td>Duration of impact</td><td>20</td><td>1</td><td>-</td><td>-</td></tr><tr><td>Cost of remedial action</td><td>10</td><td>2</td><td>-</td><td>-</td></tr><tr><td>Total score</td><td>100</td><td>220</td><td>-</td><td>-</td></tr></table> <p>The internal stakeholders were consulted regularly in various session of meetings including daily muster roll-call, social dialog and safety committee meeting etc. The external stakeholder consultation meetings were latest conducted as following:</p> <ul style="list-style-type: none">- Chersonese POM & Chersonese Estate: 24/06/2024- Tali Ayer Estate & Kalumpong Estate: 05/07/2024- Holyrood Estate: 19/07/2024 <p>Verified a sample environmental aspect impact assessment documented as following:</p> <ul style="list-style-type: none">- Environmental Impact Evaluation Form; File # SM/5.2/EIE; Serial # EIE/2023/17B-03(4); Ref. # EAI/202317B-03; Activity: Mixing chemical for Pesticide and Chemical Spraying with implement (Airblast, ST GEO-1); Environmental Aspect: Chemical spillage; Impact: Land contamination & water course discharge	Extent of impact	40	1	-	-	Duration of impact	20	1	-	-	Cost of remedial action	10	2	-	-	Total score	100	220	-	-	
Extent of impact	40	1	-	-																			
Duration of impact	20	1	-	-																			
Cost of remedial action	10	2	-	-																			
Total score	100	220	-	-																			
3.4.2	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.	Evident the Social Impact Assessment (SIA) Report for SOU 2 certification unit that covered operating units such as Chersonese Palm Oil Mill, Chersonese Estate, Kalumpong Estate and Tali Ayer Estate. The assessment has been carried out between 14	Complied																				

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	<p>- Minor Compliance -</p>	<p>to17/06/2015 by Sustainability Strategy Unit, PSQM Department.</p> <p>Evident also the Social Impact Assessment (SIA) Report for SOU 1 Sungai Dingin that covered operating units such as Sungai Dingin POM, Sungai Dingin Estate, Holyrood Estate, etc. The assessment has been carried out between 23/02/2015 to 05/03/2015 by Sustainability Strategy Unit, PSQM Department.</p> <p>The current social impact assessment was identified through social management plan such as annual stakeholder meeting, social dialogue with workers, workers welfare committee meeting, union meeting, gender committee meeting, etc. Furthermore, if there is new activities and operations, the management will conduct SIA that includes the management plan implementation which were monitored as per documented records as below:</p> <p><u>Tali Ayer Estate</u></p> <p>Evident the Addendum Social Impact Assessment (SIA) on Replanting Activity for Tali Ayer Estate, Sungai Krian Division dated 29/02/2024:</p> <ol style="list-style-type: none"> 1. 28/02/2024 – briefing to all workers during morning muster on the replanting activity. Information gathering on concerns from workers. All workers understood the briefing and some suggestion for improvement was provided by representative for each job scope. No issue raised by external stakeholder representative. <p><u>Chersonese Estate</u></p>	
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		<p>Evident the Addendum Social Impact Assessment (SIA) on Replanting Activity for Chersonese Estate, Jin Seng Division dated 01/06/2024:</p> <ol style="list-style-type: none"> 1. 25/05/2024 – replanting kick off meeting. 2. 04/06/2024 – briefing to all workers on replanting activity at field 2024B. 3. 10/06/2024 - Survey form was distributed to harvester. 4. 24/06/2024 – Briefing to stakeholders on replanting activity during stakeholder meeting. 5. No issue raised by workers and stakeholders. <p><u>Kalumpong Estate</u></p> <p>Evident the Addendum Social Impact Assessment (SIA) on Replanting Activity for Kalumpong Estate dated 12/01/2024:</p> <ol style="list-style-type: none"> 1. 10/01/2024 – replanting kick off meeting - replanting at field 2001B and 2002A. 2. 15/01/2024 – briefing to all workers on replanting activity. 3. Finding and recommendation action: All workers understood the briefing given by the management team on replanting activity and no concern raised by workers as replanting activity is a normal occurrence in the estate and no action plan is required. 4. External Stakeholders involved – SJK Txxxl Lxxxxg Kxxxxxxg, SK Dxxx Mxxxxd and Kxxl Srx Txxxxxxxxi Axxn, replanting contractor. <p>The management has established the Social Management Plan FY 2024 and summarised as below:</p>	
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		<p>1. Internal</p> <ul style="list-style-type: none"> - Impact of social dialogue meeting to all workers - Improvement of housing amenities & facilities - Gender committee - SIA report - Suara kami - Whistleblowing <p>2. External</p> <ul style="list-style-type: none"> - Stakeholders' platform - External contribution (CSR) - Overtime issues <p>Evident and sampled during the audit, the social management plan has been implemented as mentioned as per indicator.</p> <p>The Social/Environmental Action Plan available for all operating units within SOU 2 were available having information i.e issues, management plan, PIC and time frame. The input are gathered from the meeting minutes</p> <p>a) Gender Committee, NUPW, b) Safety Meeting, c) Complaint & Request from internal & external stakeholders d) and muster briefing). e) Stakeholders meeting</p>	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Evident and sampled during the audit, the social management plan has been implemented as mentioned as per indicator such	Complied

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	<p>- Critical (Major) compliance -</p>	<p>as social dialogue, gender committee, NUPW meeting, etc.</p> <p>The Environmental Management Plan for Chersonese POM mainly based on DOE License # 006275; Licensed period: 01/07/2024 – 30/06/2025; Max processing volume: 45 mt/hr</p> <p>Final Discharge parameters limit:</p> <ul style="list-style-type: none"> - BOD: 100 mg/l - SS: 400 mg/l - O & G: 50 mg/l - AN: 150 mg/l - TN: 200 mg/l - pH: 5.0 < pH < 9.0 - Temperature: 45 °C <p>Relevant environmental management and monitoring records included the following:</p> <ul style="list-style-type: none"> - Environmental Compliance Audit Report # ECAR_KKS Chersonese: 30012024 by Zxxx Lxxx; DOE Reg. # EA 01xx; CESSWI # 3xxx of Bxxx. DOE Tracking # JAS.ATP/6002/1/32; Audit date: 30/01/2024 - DOE Letter on "Status dan Skop Kerja-kerja Penambah Baik Tapak Penyimpanan Tandan Kosong Kelapa Sawit (EFB Yard) di Kilang-kilang Kelapa Sawit Milik Sime Darby Plantation Berhad – Permohonan Pengecualian Struktur Berbumbung; Letter ref. # JAS.600-3/1/4(9); Date: 30/03/2023 - Based on conditions as per letter ref. # JAS.600-1/1/4 (16); Dated 25/04/2022 and Sime Darby Plantation Berhad Standard Operating Procedures for Palm Oil Mills Doc. # 	
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		SDP/SOP/01; Ver. 1; Dated: 01/07/2018; Title: EFB Disposal Station.	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	<p>The management has maintained the current Human Resource Department established Hiring of Local Workers procedure with Doc. No.: 01- 12-19 dated 01/12/2019.</p> <p>Evident also the current Migrant Worker Responsible Recruitment Procedure updated on 20/08/2021. The procedures describe guidelines to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.</p>	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	<p>The management has maintained the current Human Resource Department established Hiring of Local Workers procedure with Doc. No.: 01- 12-19 dated 01/12/2019.</p> <p>Evident the current Migrant Worker Responsible Recruitment Procedure updated on 20/08/2021.</p> <p>Document review on application form, employment interview assessment form, medical check-up report, offer letter and employment contract at Chersonese POM, Kalumpong Estate, Chersonese Estate, Tali Ayer Estate and Holyrood Estate are available for both local and foreign workers in their personal files. A copied of identification card, driving license, passport and work permit were kept as record.</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			

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3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>According to OSH Risk Management Procedure ver. 1, which effective on 09/03/2021, stating that monitoring and review of HIRARC shall be conducted when:</p> <ol style="list-style-type: none"> 1. Significant changes in work activity, process, practices, or procedures 2. Change in working environment including changes in organization structure and personnel changes 3. Evidence that control measures are not working as intended e.g., accidents, incidents, and equipment's failure hazard reports. 4. When directed by the Director General DOSH <p><u>Tali Ayer Estate</u></p> <ul style="list-style-type: none"> • HIRARC was last reviewed on 01/01/2024 for all operation activities. Verified that last accidents occurred in Feb 2023. • Chemical & Health Risk Assessment (CHRA) has been conducted on 22/02/2020, Ref. No. HQ/09/ASS/00/124-2020-0016 by assessor with DOSH Registration No. HQ/09/ASS/00/124. The assessment covered 9 work units which includes premix area, field spraying, field manuring, field rat biting, field trunk injection, workshop and store operator & scheduled wasted store. • Latest Medical Surveillance conducted 20-21/12/2023, Ref with Kxxx Vxxx involving 35 workers. Report of the medical surveillance was available for review and no further medical concerns was noted. • The estate completed its Baseline Noise Risk Assessment on 24/06/2020, conducted by an assessor with DOSH registration no. HQ/18/PEB/00/00021 – tractor driver, workshop, and loose fruit sieve operator. Result of the 	Complied
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		<p>assessment found that all three activities were below noise exposure limit and no further action required. Updated Noise Risk Assessment has been conducted recently on 17/07/2024 which covers machineries activities, general works including rotor slasher, grinding at workshop and office activities. However, completed report has yet to be provided.</p> <p><u>Chersonese Estate</u></p> <ul style="list-style-type: none">• HIRARC was last reviewed on 14/04/2024, on FFB harvesting activity due to accident occurred on the same day. The last time incident is 5 days and has been reported accordingly.• Chemical & Health Risk Assessment (CHRA) has been conducted on 24/02/2024, Ref. No. HQ/09/ASS/00/124-2020-0013 by assessor with DOSH Registration No. HQ/09/ASS/00/124. The assessment covered 8 work units which includes chemical mixer, sprayer, manuring operator, turbo mizer operator, rat bait applicator, nursery operator, foreman and scheduled waste operator.• Medical Surveillance conducted 18-28/07/2023, with Kxxx Vxxx with registered Occupational Health Doctor (OHD), Reg. No. IH 1xxx. 26 workers were involved among sprayers, manurers and workshop personnel. Report of the medical surveillance was available for review and no further medical concerns was noted. Latest medical surveillance recently conducted from 22-29/07/2024. However, the complete report is yet to be received.• The estate completed its Baseline Noise Risk Assessment	
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		<p>on 23/07/2020, report no. HQ/18/PEB/00/0021 which conducted by an assessor with DOSH registration no. HQ/18/PEB/00/00021 – workshop, tractor driver, and grass cutter activity.</p> <ul style="list-style-type: none"> • Latest audiometric test was conducted 13/10/2023 and 23/04/2024 which involved 3 workers who works as Tractor Driver for Grass Cutting. All of them has normal result and continue with annual audiometric test. <p><u>Chersonese POM</u></p> <ul style="list-style-type: none"> • HIRARC was last reviewed and updated on 15/07/2024 for Kernel Recovery Station as per company's requirement for regular updates. • Chemical & Health Risk Assessment (CHRA) has been conducted on 24/02/2020, Ref. No. HQ/09/ASS/00/124-2020/0017 by assessor with DOSH Registration No. HQ/09/ASS/00/124. The assessment covered 8 work units which includes mill laboratory, Effluent Treatment Plant Laboratory, Boiler, Workshop, Kernel Plan, Water Treatment Plant and store, diesel refilling & scheduled wasted store. • Baseline Noise Risk Assessment was conducted on 17-18/05/2023 by assessor with DOSH reg. no. HQ/18/PEB/00/00021 for 9 stations: Ramp, Sterilizer & Tippler, Threshing, Pressing, Oil Room, Nut & Kernel Plant, Boiler & Engine Room, Laboratory and Workshop. • Mill completed its Audiometric Test on 19/03/204 & 25/03/2024, report no. AUD 0324/487 by assessor with DOSH registration no. JKKP IH 127/171-1(309). 32 workers were involved resulting 5 workers required to be 	
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		<p>sent for medical examination. All 5 workers sent to for medical checkup on 25/04/2024 and all workers were found to be medically fit with normal hearing.</p> <ul style="list-style-type: none">• Medical Surveillance was conducted from 13-15/02/2024 involving 38 workers who exposed to hexane, manganese and chromium. 2 of them were required to retest due to abnormal result. The verified retest results for both workers on 21/05/2024, confirmed that they were fit to continue working.• Air Emission Testing of Lab Fume Hood was conducted on 27/02/2024 by third party assessor with Reg. No. L-PG-AC2402CSD-0467. It was found that all the parameters monitored for the stack marked for Lab Fume Hood had complied with the respective limit stipulated under the legal regulation. <p><u>Holyrood Estate</u></p> <ul style="list-style-type: none">• HIRARC was last reviewed on 21/01/2024 for all activities as per yearly basis. Verified that there is no history of accident occurred since 2023.• Chemical & Health Risk Assessment (CHRA) has been conducted on 21/02/2024, Ref. No. HQ/09/ASS/00/124-2020-0015 by assessor with DOSH Registration No. HQ/09/ASS/00/124. The assessment covered 8 work units which includes chemical mixer, sprayer, manuring operator, rat bait applicator, trunk injection operator, foreman, storekeeper, and scheduled waste operator.• Latest Medical Surveillance conducted 24/05/2024, with Kxxx Vxxx with registered Occupational Health Doctor (OHD), Reg. No. IH 1xxx. Workers were involved among	
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		<p>sprayers and chemical mixer. Report of the medical surveillance was available for review and no further medical concerns was noted.</p> <ul style="list-style-type: none"> • The estate completed its Baseline Noise Risk Assessment on 24/06/2020, by an assessor with DOSH registration no. HQ/18/PEB/00/00021 for MTG Tractor Grabber, Grass Cutter and Tooling. As per the report, only MTG Tractor Driver required to undergo annual audiometric testing. • Audiometric test was conducted 13/10/2023 involved 2 workers who works as MTG Tractor Driver. One of them has Permanent Threshold Shift Tested (PSTS) and required to report to DOSH via JKPP 7 form. Sighted JKPP 7 forms have been submitted to DOSH website accordingly. The worker also required to conduct in regular audiometric test annually. <p><u>Kalumpang Estate</u></p> <ul style="list-style-type: none"> • HIRARC was last reviewed on 14/05/2024 for roof repairing activity as per accident occurred which cause worker has small injury. Other activities were updated on 05/01/2024 as per yearly basis. • Chemical & Health Risk Assessment (CHRA) has been conducted on 10/06/2023, Ref. No. HQ/22/ASS/00/00059-2023/45 by assessor with DOSH Registration No. HQ/22/ASS/00059. The assessment covered 8 work units which includes chemical mixer, sprayer, manuring operator, rat bait applicator, nursery workers, trunk injection operator, foreman, and storekeeper, • Latest Medical Surveillance conducted 7-21/02/2024, 	
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		<p>with Kxxx Vxxx with registered Occupational Health Doctor (OHD), Reg. No. IH 1xxx. 52 workers were involved among sprayers and chemical mixer, foreman and tractor drivers. Report of the medical surveillance was available for review and all workers were found medically fit.</p> <ul style="list-style-type: none"> The estate completed its Baseline Noise Risk Assessment on 16/07/2024, by an assessor with DOSH registration no. HQ/23/PEB/00/00095 for activities related 3 main group of activities which are machineries (14 activities), general works (14 activities), and officer (1 activity). As per the report, only workers involved in Mini Tractor, Mechanical Buffalo, Blower, ST-Gio, Excavator and Grass Cutting were required to undergo annual audiometric testing. Based on interview session and review of previous NRA, there is no requirement of audiometric test for last year. Recent NRA found that audiometric test needs to be conducted and audiometric test was conducted on 03/07/2024 involved 31 workers. However, the report of the test is not available yet. 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Occupational Safety & Health Plan for the year 2024 that has been prepared by certification units. The effectiveness of the plan was monitored through various monitoring record and inspection such as:</p> <ul style="list-style-type: none"> Monthly PPE monitoring for workers handling chemicals; spraying activities, rat bait application, tractor driver and pump application. Regular Workplace inspection was conducted for Guard post, main office, chemical store, road condition-mix area, fertilizer store, scheduled waste store, workshop and diesel tank for 	Complied

		<p>each certification unit. For example, at Tali Ayer Estate, latest inspection conducted on 12/06/2024, while 20/06/2024 for Chersonese Estate.</p> <ul style="list-style-type: none"> • Accident & incident reporting; JKPP 6, JKPP 7 and JKPP 8 • Medical surveillance as conducted annually by operating unit ; 20-21/12/2023 (Tali Ayer Estate), 18-28/07/2024 (Chersonese Estate and 24/05/2024 (Holyrood Estate) and 07-21/02/2024 for Kalumpang Estate. • Chemical exposure monitoring by implementation control measure recommended by CHRA assessor every 5 years. • Audiometric test was conducted annually by operating unit; 13/10/2023 (Chersonese Estate), 19/03/2024 (Holyrood Estate), 25/03/2024 for Chersonese POM and 03/07/2024 at Kalumpang Estate. 	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>All operational units within SOU 2 have established and documented a training plan based on an annual training needs analysis. The Training Need Analysis and Training Schedule for FY 2024 were reviewed, covering all job designations, including contractors. The training program encompasses areas such as Safety, Environment, and Management Systems. There are no scheme smallholders or out-growers within SOU 2.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units retained records of the conducted training sessions. Reviewed the training records as follows:</p> <p><u>Tali Ayer Estate</u></p> <ul style="list-style-type: none"> • Performance Monitoring Vehicle, Vehicle Safety and Productivity, dated 03/08/2024 	Complied

		<ul style="list-style-type: none"> • RSPO/MSPO Refresher Briefing, dated 02/08/2024 • Toolbox Briefing; Medical Surveillance Purpose & Safety and PPE Briefing, dated 30/07/2024 • Safety Briefing for Harvester, dated 15/07/2024 • Fire Drill Training by BOMBA Bagan Serai, dated 03/07/2024 • Hearing Conversation Training, dated 17/05/2024 • Refresher Training on Chemical Handling, HIRARC, E-Sime+ and Golder Rules, dated 23/04/2024 • Training for Tractor Driver and Workshop Operator, dated 20/04/2024 • Safe Work Procedure for manuring and fertilizer placement, dated 06/04/2024. • Safety Training for Harvesting, PPE Matrix, Safe Distance, and Ergonomic Position, dated 24/02/2024 <p><u>Chersonese Estate</u></p> <ul style="list-style-type: none"> • Safety Briefing and Fire Drill Training, dated 13/06/2024 • Annual First Aid Training, dated 10/05/2024 • Personal Hearing Protection (PHP) and Hearing Conservation Training, dated 24/04/2024 • Training on Safety Data Sheet (SDS), Chemical Spill and Poisoning, dated 06/02/2024 • Training on Safe Work Procedure and Personal Protective Equipment (PPE), dated 05/02/2024 • Safe Work Procedure for Rat Bait Applicator, dated 02/05/2024 • Ganoderma Census Training, dated 02/05/2024 	
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		<ul style="list-style-type: none"> • Safe Work Procedure for Manuring Activity which includes emergency precaution in handling when exposed to chemicals, dated 19/04/2024 <p><u>Chersonese POM</u></p> <ul style="list-style-type: none"> • Scheduled Waste Management Training, dated 26/07/2024 • Briefing of General Requirements in Safety and Health in Mill, dated 01/08/2024 • Contractor Engagement and Briefing on Golden Rules, Permit To Work Requirement, HSE Alert, Requirement of Safety Harness during Working at Height, dated 17/01/2024 • Fire Drill Training by Balai Bomba Kuala Kurau, dated 28/06/2024 • Hearing Conservation Training, dated 15/07/2024 • Noise Risk Assessment Review Meeting, dated 15/07/2024 • Tractor Operator Safety Training, dated 21-22/04/2024 • Workplace Pilot Inspection Training, dated 20/05/2024 • HIRARC Review and PPE Training, dated 15/02/2024 <p><u>Holyrood Estate</u></p> <ul style="list-style-type: none"> • Refresher Training for Tractor Driver, dated 18/01/2024 • PPE Awareness Training & Hearing Conservation Training, dated 13/01/2024 • Safe Work Procedure for High Risk Job at Workshop, dated 22/04/2024 • Safety Work Procedure for Pruning & Staking Cutting Stalk, dated 22/12/2023 	
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		<ul style="list-style-type: none"> • Safe Work Procedure for Spraying Activity, dated 20/01/2024 • Refreshing Training for Manuring Application, dated 08/02/2024 • IPM Training, Ganoderma And Barn Owl Box Census, dated 03/08/2024 • Chemical Management Training, dated 22/04/2024 • Emergency Response Drill Training (Chemical Spillage and Fire), dated 18/05/2024 <p><u>Kalumpang Estate</u></p> <ul style="list-style-type: none"> • Briefing on Chemical Handling, Spraying & PPE, dated 22/02/2024 • Briefing on Rat Baiting Program, dated 22/05/2024 • Fire Drill Training using Fire Extinguisher, dated 25/04/2024 • Refresher on First Aid Training, dated 23/04/2024 • Training on Safety & Health Committee and HIRARC, dated 15/03/2024 • Briefing on Hearing Conservation Program, dated 05/03/2024 • PPE Briefing for Manuring Workers, dated 05/02/2024 • Briefing to Mandores regards to E-sime+, PPE training, HIRARC and SDG Policies, dated 20/12/2023 	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Training conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by Group Sustainability & Quality Management (GSQM) personnel, as per Training record dated 31/07/2024.</p>	Complied
Criterion 3.8: Supply chain requirement for mills			

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(note: All supply chain requirements are considered as Critical (C) . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing 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>	Not applicable since Chersonese POM implements MB module.	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Chersonese POM receives and processes both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Chersonese POM has registered their mill in the PalmTrace as following:	Complied

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		<ul style="list-style-type: none"> – License ID: CB156023 – Members Name: Strategic Operating Unit (SOU 2) - Chersonese Palm Oil Mill – Members ID: RSPO_PO1000000302 – RSPO Membership Number: 1-0008-04-000-00 – Type Of Business: Oil Mill 	
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<ul style="list-style-type: none"> a) Documented procedures established as per Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia; Doc. ID # SDP/GSD/202401/SCCS; Ver. # 02; Approved date: January 2024 to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. b) Complete and up to date records and reports were demonstrating the compliance with RSPO SCCS requirements including daily production report, mass balance sheet and training records etc. c) Specified in Procedure section 4.0 Responsibilities; 4.1 The Head of Operating Unit shall have the overall responsibility for the implementation of SOP; 4.2 The Head of Operating Unit may assign roles to relevant personnel or invite personnel from various departments where necessary to assist in the implementation of SOP. Interview with relevant personnel confirmed they aware on the requirement of this procedure d) Specified in Procedure section 7.0 Receiving FFB at The Mill supported with Appendix 1c: List of Supply Base and Crop Diversion for SOUs. 	Complied
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal 	<ul style="list-style-type: none"> i) The procedure to conduct annual internal audit is addressed in the Sustainable Supply Chain and Traceability Procedure for 	Complied

	<p>audit to determine whether the mill:</p> <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. <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>Upstream Malaysia; Doc. ID # SDP/GSD/202401/SCCS; Ver. # 02; Approved date: January 2024. Latest internal audit was conducted as per verified report of Chersonese POM SCCS Internal Audit Date: 07/05/2024. No findings related to SCCS matter raised</p> <p>ii) Latest Management Review Meeting was conducted on 13/05/2024 with minutes verified included the SCCS requirements as part of the meeting agenda.</p>	
3.8.7	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>Chersonese POM maintained 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 verified as following:</p> <ul style="list-style-type: none"> - FFB received ticket # 267844; Supplier: E140-Holyrood Estate; Product: 0001-FFB A Crop; Field # 2012C Bukit Rhona Div. 2; Net weight: 10,450 kg; DO # 21172; Delivery date: 06/08/2024 - FFB received ticket # 267847; Supplier: E010-Tali Ayer Estate; Product: 0001-FFB A Crop; Field # 2014BSg. Bogak Div. 3; Net weight: 10,960 kg; DO # 3;4384 Delivery date: 06/08/2024 	Complied
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</p>	<p>Chersonese POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as per sample as following:</p>	Complied

	<p>document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>CSPO:</p> <p>Buyer: Kxxx Oxxx, No.XX, Jalan Sxxx Pxxx X/XX, Fasa XXX, Taman Perindustrian Pulau Indah, 42920 Pelabuhan Klang, Selangor; Seller: Chersonese Palm Oil Mill, 34350 Kuala Kurau, Perak; Delivery date: 12/12/2023; Weighbridge ticket date: 12/12/2023; RSPO Cert. # RSPO 590800; Product: 0007-Crude Palm Oil (CPO)-RSPO MB; Nett weight: 40,340 kg; Weighbridge ticket # 016290; Contract # S/PSD/2312/CPO0002G</p> <p>CSPK:</p> <p>Buyer: Sime Darby Oils Carey Island KCP Sdn. Bhd. Lot 18283, Jalan Pulau Carey, 42960 Pulau Carey, Selangor; Seller: Chersonese Palm Oil Mill, 34350 Kuala Kurau, Perak; Delivery date: 03/08/2024; Weighbridge ticket date: 03/08/2024; RSPO Cert. # RSPO 590800; Product: 0008-Palm Kernel-RSPO MB; Nett weight: 30,050 kg; Weighbridge ticket # 016950; Contract # S/PSD/2407/PKL0051</p>	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable 	<p>There is no milling activity outsourced by the mill except for transportation as per Letter of Extension of Transportation Services for Crude Palm Oil (CPO); Period: 01/11/2023 – 31/10/2024; Contract ref. # T/SDPB/PEN/CPO/0720/003; Date: 12/12/2020; Contractor/Transporter: Mxxx Bxxx Sdn. Bhd.</p> <p>Verification of the contract agreements showed that the requirements of RSPO SCCS were also included in the contract involving CPO and PK Transport Agreement as following:</p> <ul style="list-style-type: none"> - The mill maintains legal ownership of CPO and PK during the transportation by the contractor to the buyer - The transporter agreed to ensure that CB has access on their 	Complied

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	<p>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>site in case an audit is deemed necessary</p> <ul style="list-style-type: none"> - The transporter understood that the documented Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia; Doc. ID # SDP/GSD/202401/SCCS; Ver. # 02; Approved date: January 2024 will be followed - The mill ensured via contract agreement that the transporter provide relevant access for CB to their respective operations, systems, and all information, when this is announced in advance 	
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.	The name and contact details of the transporters were recorded in the mill's list of stakeholders 2024 and updated whenever necessary.	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.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p>	<p>i) Excel format is used for the mass balance calculation. Among the documented information available in the format is month, FFB processed, OER, CPO amount (opening, produced, and closing), dispatch of CPO & PK and balance of CPO & PK both in virtual and physical.</p> <p>ii) Verification of the MB sheet showed that the mill was able to demonstrate the products were delivered from positive stocks. Should there be any short sale, it will be balanced within three months. Relevant records and reports retained for 3 years as per Section 5.4 Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia; Doc. ID #</p>	Complied

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	<p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</p>	<p>SDP/GSD/202401/SCCS; Ver. # 02; Approved date: January 2024 for sample records of Daily Production Figure (Report) dated 31/05/2022.</p> <p>iii) The facility opted for three monthly basis record and balance.</p> <p>iv) Verification of the MB accounting showed that:</p> <ul style="list-style-type: none"> - all receipts of RSPO certified FFB and deliveries of RSPO certified PK were recorded and balanced on a three-monthly basis. - all volumes of certified PK that were delivered were deducted from the material accounting system according to the mill's actual OER/KER. - all deliveries of certified PK were made from positive stock. 	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.</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 previous actual OER & KER and estimation can be seen in Table 10 of this report.</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Not applicable. The facility opted for mass balance model.</p>	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out</p>	<p>Registration of Transactions carried out as per Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia; Doc. ID</p>	Complied

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	<p>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># SDP/GSD/202401/SCCS; Ver. # 02; Approved date: January 2024.</p> <p>i) The procedure specified that the Global Trading & Marketing (GTM) personnel to perform Shipping Announcement in Palm Trace within 3 months from the date of the first physical dispatch of the contract as per sample for Transaction ID # TR-0855b7d3-6d6e; Created date: 25/04/2024; Confirmation date: 25/04/2024.</p> <p>ii) The procedure also specified that the MPPD to remove the RSPO volumes sold under ISCC, MSPO or conventional at least once a year. Latest removal done for the conventional CPO sold as per Table 11 above under previous license prior to expiry date.</p>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	No product claims made except for corporate communications with details in General Corporate Communications indicators below.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	Corporate communication which highlighting its RSPO membership and/or its commitment to the objectives and principles of RSPO was seen made on the company's website.	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none"> A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member's history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership 	Verification of the company's website showed that the parent company has highlighted their RSPO membership status, and commitment to meet the standard requirements. There was no RSPO Trademark used.	Complied

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4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	The mill does not use the RSPO corporate logo in any of their communication tools such as company's website, letterhead, business cards, and flyers to name a few.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	The mill does not make any statement that may lead to believe that RSPO memberships by itself implies the selling of RSPO certified oil palm product.	Complied
4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." • "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." • "We are RSPO certified. Ask us for our RSPO certified products." 	The mill does not make any statements that highlight their RSPO certification status and product-related claims.	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> <ol style="list-style-type: none"> "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)." X% of palm oil sourced by our organisation are certified 	Not applicable as the mill is an RSPO member under its parent company, SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad).	Not Applicable

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	<p>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>		
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	Not applicable as no product specific communication was made.	Not Applicable
5.1.2	Product-specific communications are voluntary.	Not applicable as no product specific communication was made.	Not Applicable
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	Not applicable as no product specific communication was made.	Not Applicable
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	Not applicable as no product specific communication was made.	Not Applicable
5.1.5	If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters 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	Not applicable as no product specific communication was made and UoC is not under retailers, traders or distributors category.	Not Applicable

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	<p>shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	Not applicable as no product specific communication was made and UoC is not under retailers, traders or distributors category.	Not Applicable
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	No RSPO Label was used in all the off-pack claims made except for supply chain model (CPO/PK RSPO MB) product code and RSPO certificate number on shipping documents which were verified correctly stated as per sample verified in indicator 3.8.8 above.	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	Verification on the sampled shipping documents of the certified PK sales such as sales contract, weighbridge tickets, delivery order, and commercial invoice confirmed that the supply chain	Complied

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	being made.	model and certificate number were correctly stated.	
5.2.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	Not applicable as the facility is not a distributor or wholesaler.	Not Applicable
5.3 On pack claims			
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	Not applicable as no on-pack claim was made.	Not Applicable
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* 	Not applicable as no on-pack claim was made.	Not Applicable

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	<ul style="list-style-type: none"> Contains RSPO IP/SG palm oil* Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>		
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> RSPO MIXED* Contributes to the production of RSPO certified palm oil* Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on-pack claim was made.	Not Applicable
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> RSPO 50% MIXED* Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on-pack claim was made.	Not Applicable
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> RSPO CREDITS* Supports the production of RSPO certified palm oil* Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on-pack claim was made.	Not Applicable
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	Not applicable as no on-pack claim was made.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Not applicable as no on-pack claim was made.	Not Applicable
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	Not applicable as no on-pack claim was made.	Not Applicable
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	Not applicable as no on-pack claim was made.	Not Applicable

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MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers. Therefore, 100% of certified oil palm content in the products can be achieved.	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.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers. Therefore, 100% of certified oil palm content in the products can be achieved.	Complied
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. • The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	Chersonese POM only apply MB model and the conventional CPO are downgraded from MB whenever demanded.	Complied
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does 	No on-pack claims made hence, this is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Complied

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	<p>not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</p> <ul style="list-style-type: none"> The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 		
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The company has established Group Sustainability & Quality Policy signed Group Managing Director dated 02/12/2019. The policy is the commitment by the company in respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020.</p> <p>The management also has established Policy on the Protection of Human Rights Defenders (HRDs) with effective date on 25/03/2020. The policy is the commitment of the company in respect and safeguard human 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 the company. This Policy is applied to all stakeholders affected by the business activities and relationships including directors, employees, counterparties, business partners, workers in our operations and supply chains, and communities surrounding our operations.</p> <p>The company policies, reports and statement are publicly available in the SD Guthrie website the SD Guthrie website (Reports, Policies and Statements SD Guthrie).</p>	Complied

		<p>The policy also has been communicated during stakeholders' consultation as per 1.1.3 as verified by sample internal and external stakeholders through on-site interview.</p> <p>Training to workers on company policies and procedures:</p> <p>Tali Ayer Estate – 17/01/2024 – briefing on Employment Act, Minimum Wages Order, 11 ILO indicators, employment contract, grievance channel, pay slip, VIP & COBC, OPP, PPE, HRC & HRDF and Policy of SD Guthrie.</p> <p><u>Chersonese Estate</u></p> <ol style="list-style-type: none"> 1. Refresher on ergonomic management during work, ILO Compliance, Suara Kami and whistleblowing channel including Esime for safety – 11/09/2023 and 13/02/2024 2. OPP – 15/09/2023 3. Social Dialogue – 19/09/2023 4. Freedom of Movement – 25/09/2023 5. Briefing on PPE – 02/10/2023 6. Sexual Harassment Policy – 06/01/2023 7. 11 Indicator ILO, Visa and Grievance Channel – 26/11/2023 8. OPP as medium for housing grievances and complaints – 02/01/2024 <p>Holyrood Estate – 13/01/2024 (Main Div) and 17/01/2024 (Bukit Rhona Div). Refresher briefing on ILO Indicators, passport safe keeping, social dialogue, medical access, OSH, freedom of movement, housing OPP, grievance channel, wages structure,</p>	
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		physical and sexual abuse, HRDF, COBC and employment contract.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	<p>The management prohibits any form of harassment in their operation as per the policies above.</p> <p>Onsite interviewed with sampled workers informed they have no experience on any form of harassment by the management. All workers satisfied with the social benefits given by the company and most of the local and foreign workers could stay worked with the company more than 10 years – 20 years.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>The management has established Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/11/2018. The objective of the procedure is to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill and estates. The procedure describes timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation.</p> <p>Evident the latest Grievance Response Standard Operating Procedure dated 07/05/2024. This Procedure shall outline the procedural aspects of the Grievance Unit in response to the following:</p> <ol style="list-style-type: none"> 1. The intake and logging of grievances received through formal and informal channels. 2. The assignment of grievances received for investigation. 	Complied

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		<p>3. The cancelling, withdrawing, closing or reopening an investigation.</p> <p>The management has in place the Plantation Quality Management System, Appendix 5, Flowchart and Procedure on Handling Social Issues, version 1, issue date 01/11/2008 as one of the systems to address the complaint and grievances.</p> <p>Once the case taken by the mill or estate management, the initial negotiation between estate management and disputed parties will be resolved within two weeks after outbreak of issue. Half yearly meeting with stakeholders/communities shall be carried out irrespectively on any occurrence of social issues.</p> <p>If the case did not resolve the issue will be reported to the Head Office for Information Gathering and Investigation Process. Negotiation proposed solution:</p> <ol style="list-style-type: none"> 1. Mediation process 2. The approach of responsibility by internal corporate social <p>The Group also has developed a worker helpline called "Suara Kami", established in 2018, provides an effective channel for workers to raise any issues they may have. It provides an avenue for workers to report on their working conditions, recruitment, safety, and other issues. But more importantly, the helpline ensures these issues are fully handled via clear protocols with consistent attention to follow-up and resolution possible.</p> <p>The Standard Operating Procedure of Suara Kami Helpline was approved on 15.04.2020 by Rashyid Redza Anwarudin Head, Group Sustainability. All concerns are assigned a category and to be addressed within the guided timeframe of the assigned category:</p>	
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		<p>2.1.2.1: 14 working days for Forced Labour</p> <p>2.1.2.2: 4 working days for Urgent Non-Forced Labour</p> <p>2.1.2.3: 14 working days for Non-Urgent Non-Forced Labour</p> <p>Stated also under clause 2.1.3 on respecting the rights of workers to remain anonymous and work with the system provider that will act as intermediary to obtain any further information required for investigation. In cases where workers provided consent on their personal details, the investigations are to be conducted in a discreet manner.</p> <p>Freedom in making grievance/complaint to solve any issues at workplace or worker quarters and no action will be stressed against the complainer or person who making grievances. There are few mediums such as:</p> <ol style="list-style-type: none">1. Suara Kami<ul style="list-style-type: none">• 7 languages operator• Third party – independent• Confidentiality• Call 1800818771 or text 01130116031 or via Facebook messenger.2. Whistle Blowing<ul style="list-style-type: none">• Free• Identity being secretly protected• Independent party• Call 1800223388• WhatsApp 019 2797553• Email: whistleblowing@sdguthrie.com	
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		<p>3. 'Oil Palm Pal' (OPP) – barcode for housing repairs</p> <p>The management also has established Whistle Blowing Policy (GPA No. B5) dated 29.08.2019. Grievance with Wrongdoing elements as defined in Clause 4.3. Through this GPA, Directors, Employees, Counterparties and Business Partners should be reassured that they are able to raise genuine concerns in good faith without fear of reprisals or retaliation.</p> <p>Any complaints or grievances from workers will be reported using Online application called OPP and the barcode for housing repairs has been displayed at line site area, quarters door and individual safety helmet. The report will be assessed by HQ. The management will take immediate action to settle all the issues. Any issues also can be reported through 'Social Dialog'. The management also has appointed Social Officer to handle any social issues. The Gender Committee has been established to handle issues related to sexual harassment, women's rights, and reproductive rights.</p> <p>While most of the contractor will directly meet the management team to discuss any issues related to their contract work. A complaint form, Barcode Suara Kami was available at the Security Post or office information board, where employees and affected stakeholders can make a complaint at any time.</p>	
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>There procedures are in place to ensure is it understood by affected parties and illiterate parties as it has been communicated during stakeholders meeting, training to workers, social dialogue, worker welfare or NUPW meeting and gender committee etc. as verified by sample internal and external stakeholders through on-site interview.</p>	Complied

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		<p>Stakeholder consultation has been conducted as stated in indicator 1.1.3 above.</p> <p>Training to workers on company policies and procedures: Tali Ayer Estate – 17/01/2024 – briefing on Employment Act, Minimum Wages Order, 11 ILO indicators, employment contract, grievance channel, pay slip, VIP & COBC, OPP, PPE, HRC & HRDF and Policy of SD Guthrie.</p> <p><u>Chersonese Estate</u></p> <ol style="list-style-type: none"> 1. Refresher on ergonomic management during work, ILO Compliance, Suara Kami and whistleblowing channel including Esime for safety – 11/09/2023 and 13/02/2024 2. OPP – 15/09/2023 3. Social Dialogue – 19/09/2023 4. Freedom of Movement – 25/09/2023 5. Briefing on PPE – 02/10/2023 6. Sexual Harassment Policy – 06/01/2023 7. 11 Indicator ILO, Visa and Grievance Channel – 26/11/2023 8. OPP as medium for housing grievances and complaints – 02/01/2024 <p><u>Holyrood Estate</u> – 13/01/2024 (Main Div) and 17/01/2024 (Bukit Rhona Div). Refresher briefing on ILO Indicators, passport safe keeping, social dialogue, medical access, OSH, freedom of movement, housing OPP, grievance channel, wages structure, physical and sexual abuse, HRDF, COBC and employment contract.</p>	
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		During document review and interview with workers their aware on how to use QR Barcode Scanning for OPP (housing repairs), Suara Kami, Whistle blowing, E-Sime (safety report), etc.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	<p>There is no grievance or complaint received from external stakeholders by the SOU 2 certification unit during the audit. Any request will be written to the mill/estate management and discussed during stakeholders' consultation with appropriate feedback and action plan.</p> <p>For Internal Complaint, sighted the Quarters Defect Report via OPP for the following estates with pictorial evident: Samples of complaint records (OPP) 2024 and 2023:</p> <p><u>Tali Ayer Estate</u></p> <ol style="list-style-type: none"> 1. Date: 02/08/2024 Name: Ku Mxxd Axxxxe, House No: D20 – the front light and switch of the bathroom is broken – date completed 03/08/2024. 2. Report on 31/07/2024, Name: Ixxxm Pxxxxa, No C29, clogged toilet, completed on 31/07/2024. 3. Report on 26/09/2023, Bxxi Mxxxxl, House No: A14, broken Bed frame and completed on 26/09/2023. <p><u>Chersonese Estate</u></p> <ol style="list-style-type: none"> 1. Report on 22/07/2024, Name: Axxxd Bxxxxl, House No: Aug-90, leaking water tank and completed on 24/07/2024 by replacing the ball valve. 	Complied

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		<p>2. Report on 26/07/2024, Name: Axxl Mxxr, House No: 102/2012, broken water tank and completed on 29/07/2024.</p> <p><u>Holyrood Estate</u></p> <p>1. Report on 25/07/2024, Name: Axxu, House No: 126, most of lamp's malfunction and completed on 28/07/2023.</p> <p>2. Report on 13/06/2024, Name: Rxxl Axxn, House No: 72, doorknob broken of front door and completed on 19/06/2023 due to the items arrived on Saturday.</p> <p>Verified the records of Suara Kami for SOU 2 certification unit from Sustainability Person In-charge and Manager on the status of the issues and action taken by the HQ.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Once the case taken by the mill or estate management, the initial negotiation between estate management and disputed parties will be resolved within two weeks after outbreak of issue. Half yearly meeting with stakeholders/communities shall be carried out irrespectively on any occurrence of social issues as verified by sample internal and external stakeholders through on-site interview.</p> <p>If the case did not resolve the issue will be reported to the Head Office for Information Gathering and Investigation Process. Negotiation proposed solution:</p> <p>1. Mediation process</p>	Complied

		2. The approach of responsibility by internal corporate social	
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	<p>The management initiate contributions to local sustainable development on social support initiatives includes promoting educations and offering scholarships to deserving students, promoting the rights and wee-being of marginalized communities, improving communities' access to healthcare, assisting communities with disaster relief & prevention, donations to the needy and tree planting etc.</p> <p>The samples as follows:</p> <ol style="list-style-type: none"> 1. 'Majlis Kesyukuran dan Doa Selamat' at Surau As-Syakirin – 11/01/2024 2. Repairing the roof of the SJKT Lxxxxg Sxxxxi Bxxxxk – 18/01/2024 3. Cut tree branches at the SJKT Lxxxxg Sxxxxi Bxxxxk – 18/01/2024 4. Get back to school program with Sime Darby Foundation – 09/04/2024 5. Donations in the form of food and drinks for the SJKT Lxxxxg Kxxxxxxg cross-country program - 25/08/2023 6. Levelling the school grounds or fields – 17/01/2024 7. Donation of Dxxx Mxxxxxxs national school sports tournament - 20/06/2024 	Complied
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the	SOU 2 certification unit able to demonstrate the evidence of legal ownership if its lands through possession of land titles as per samples below:	Complied

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	<p>history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p><u>Chersonese Estate and Chersonese POM:</u></p> <table border="1"> <thead> <tr> <th>'Mukim'</th><th>Type & Ownership No</th><th>Lot No</th><th>Real Term</th></tr> </thead> <tbody> <tr> <td>Kuala Kurau</td><td>GM 1xx7</td><td>2xx6</td><td>'Pertanian'</td></tr> <tr> <td>Kuala Kurau</td><td>GRN 50xx1</td><td>2xx9</td><td>'Pertanian'</td></tr> <tr> <td>Kuala Kurau</td><td>GM 4xx9</td><td>2xx8</td><td>'Pertanian'</td></tr> <tr> <td>Kuala Kurau</td><td>GM 4xx6</td><td>2xx6</td><td>'Pertanian'</td></tr> <tr> <td>Kuala Kurau</td><td>GRN 2xxx4</td><td>3xx9</td><td>'Pertanian'</td></tr> <tr> <td>Bagan Serai</td><td>GM1xx2</td><td>5xx6</td><td>'Pertanian'</td></tr> <tr> <td>Kuala Kurau</td><td>PN 313xx2</td><td>5xx6</td><td>'Pertanian'</td></tr> </tbody> </table> <p><u>Holyrood Estate</u></p> <table border="1"> <thead> <tr> <th>'Mukim'</th><th>Type & Ownership No</th><th>Lot No</th><th>Real Term</th></tr> </thead> <tbody> <tr> <td>Hulu Ijok</td><td>GRN 60xx0</td><td>7x1</td><td>'Pertanian'</td></tr> <tr> <td>Selama</td><td>GRN 12xx9</td><td>8x3</td><td>'Pertanian'</td></tr> <tr> <td>Selama</td><td>GRN 13xx8</td><td>1xx7</td><td>'Pertanian'</td></tr> <tr> <td>Hulu Ijok</td><td>GRN 85xx4</td><td>2xx4</td><td>'Pertanian'</td></tr> <tr> <td>Selama</td><td>GRN 66xx6</td><td>2xx2</td><td>'Pertanian'</td></tr> <tr> <td>Selama</td><td>GRN 58xx6</td><td>2xx5</td><td>'Pertanian'</td></tr> </tbody> </table>	'Mukim'	Type & Ownership No	Lot No	Real Term	Kuala Kurau	GM 1xx7	2xx6	'Pertanian'	Kuala Kurau	GRN 50xx1	2xx9	'Pertanian'	Kuala Kurau	GM 4xx9	2xx8	'Pertanian'	Kuala Kurau	GM 4xx6	2xx6	'Pertanian'	Kuala Kurau	GRN 2xxx4	3xx9	'Pertanian'	Bagan Serai	GM1xx2	5xx6	'Pertanian'	Kuala Kurau	PN 313xx2	5xx6	'Pertanian'	'Mukim'	Type & Ownership No	Lot No	Real Term	Hulu Ijok	GRN 60xx0	7x1	'Pertanian'	Selama	GRN 12xx9	8x3	'Pertanian'	Selama	GRN 13xx8	1xx7	'Pertanian'	Hulu Ijok	GRN 85xx4	2xx4	'Pertanian'	Selama	GRN 66xx6	2xx2	'Pertanian'	Selama	GRN 58xx6	2xx5	'Pertanian'	
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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	The management has developed a Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new	Complied																																																																

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		development. No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process for SOU2. The legality of land was evident (as reported under 4.4.1).	
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process for SOU2. The legality of land was evident (as reported under 4.4.1).	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process for SOU2. The legality of land was evident (as reported under 4.4.1).	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 land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process for SOU2. The legality of land was evident (as reported under 4.4.1).	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders	Complied

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	mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process for SOU2. The legality of land was evident (as reported under 4.4.1).	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process for SOU2. The legality of land was evident (as reported under 4.4.1).	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process for SOU2. The legality of land was evident (as reported under 4.4.1).	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process for SOU2. The legality of land was evident (as reported under 4.4.1).	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	SOU 2 certification unit able to demonstrate the evidence of legal ownership if its lands through possession of land titles. No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the	Not Applicable

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		<p>last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	Not Applicable
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into</p>	<p>The management has maintained to use the current Human Rights Charter established with 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.</p>	Not Applicable

	<p>voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p>The management has maintained to use the current Human Rights Charter established with 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.</p>	Not Applicable

	- Minor compliance -	<p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	
4.5.6	<p>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.</p> <p>- Minor compliance -</p>	<p>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	Not Applicable
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.	<p>The management has maintained to use the current Human Rights Charter established with 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</p>	Not Applicable

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	- Minor compliance -	<p>(FPIC) process to any new developed.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	Not Applicable
<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			

4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	Not Applicable
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	Not Applicable
4.6.3	Evidence is available that equal opportunities are provided to both men	The management has maintained to use the current Human Rights	Not Applicable

	<p>and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	Not Applicable
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and			

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relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	Not Applicable
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has maintained to use the current Human Rights Charter established with 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.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. 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</p>	Not Applicable

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		<p>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> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</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>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	Not Applicable

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Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	<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>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	Not Applicable
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit</p>	Not Applicable

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		management. Therefore, not applicable.	
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 -	<p>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit management.</p> <p>Therefore, not applicable.</p>	Not Applicable
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 -	<p>The management has maintained to use the current Human Rights Charter established with 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.</p> <p>No new planting and issues of customary land occurs in estate within SOU 2 certification unit that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conduct by SOU 2 certification unit</p>	Not Applicable

		management. Therefore, not applicable.	
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	<p>The prices for Fresh Fruit Bunches (FFB) are clearly outlined in Schedule 3 of the Contract Agreement between SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) and the FFB suppliers. All FFB suppliers have a copy of this contract agreement for easy reference.</p> <p>Current and previous period prices are made accessible to FFB suppliers and smallholders by being publicly posted at the weighbridge office or upon request by them. These prices are determined using the Malaysian Palm Oil Board (MPOB) Monthly Average and the Mill Oil Extraction Rate (OER) & Kernel Extraction Rate (KER).</p>	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Verified the latest meeting with FFB Suppliers conducted on 16/07/2024. The meeting was to explain on how the FFB pricing is made to all the FFB suppliers accordingly. Nevertheless, there were no smallholders supplying directly to Chersonese POM.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	The pricing is determined by the MPOB Monthly Average Price for CPO and PK, as well as the OER and KER ratings assigned by Chersonese POM, which has been confirmed through the validation of self-billed invoices from FFB suppliers. According to an interview with the management, FFB pricing will be calculated based on daily MPOB pricing for both CPO and PK, including additional costs such as CESS MPOB, transport costs, storage costs, and processing costs.	Complied

5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes, and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	Chersonese POM received and processed both RSPO certified and uncertified FFB from FFB Collection Centre 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 Chersonese POM base on hectare requirement by RSPO (50Ha)	Not Applicable								
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	Contract agreement sighted for FFB suppliers and stated in the agreement on agreed timeframe and there is also evidence that the contract is legal, fair, and transparent based on the verification done on the sampled contract agreement. Sample has been taken for 2 FFB supplier which are CXX SXXXX TXXXXXX Sdn Bhd and SX FXXXXXX Enterprise.	Complied								
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Chersonese POM guarantees that all agreed payments to external Fresh Fruit Bunch (FFB) suppliers are promptly disbursed in accordance with the contract agreement.</p> <p>Samples of payment voucher has been taken for 2 FFB supplier in July 2024.</p> <ol style="list-style-type: none"> 1. Payment Voucher for CXX SXXXX TXXXXXX Sdn Bhd - Doc. No. 1600037522, Invoice No. 0085-0086 dated 05/08/2024. 2. Payment Voucher for SX FXXXXXX Enterprise – Doc. No. 1600037465, Invoice No. 3663, dated 05/08/2024 	Complied								
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Chersonese POM conducts regular calibration on their weighbridges used to determine the FFB tonnage for all FFB suppliers. There are 2 weighbridges used in the mill and records of yearly calibration for both weighbridges were available for verification as below:</p> <table border="1"> <thead> <tr> <th>No</th><th>Details</th><th>Weighbridge 1</th><th>Weighbridge 2</th></tr> </thead> <tbody> <tr> <td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	No	Details	Weighbridge 1	Weighbridge 2					Complied
No	Details	Weighbridge 1	Weighbridge 2								

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		1	Capacity	60,000 kg	60,000 kg	
		2	Serial Number	B829135378	B522989612	
		3	Certificate Number	D 124561	D 124569	
		4	Safety Label Number	DE18015547	DE18015551	
		5	Calibration Date	09/01/2024	06/02/2024	
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) continues to uphold the Responsible Sourcing Guidelines (RSG) when engaging with third-party suppliers of Fresh Fruit Bunches (FFB) and Crude Palm Oil (CPO). This ensures that the fruits and CPO are sourced from identified, legal, and responsible sources. The identification of potential external suppliers is the responsibility of the Outside Crop Purchaser (OCP) Upstream. However, information about SD Guthrie Berhad’s RSG programs can be accessed via their website: https://www.sdguthrie.com/sustainability/responsible-sourcing/				Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established Grievance Response Standard Operating Procedure, version 2, approved on 18/07/2022 for grievance handling. However, currently Chersonese POM does not manage a scheme for smallholders.				Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.						
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) continues to uphold the Responsible Sourcing Guidelines				Complied

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	<p>in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>(RSG) when engaging with third-party suppliers of Fresh Fruit Bunches (FFB) and Crude Palm Oil (CPO). This ensures that the fruits and CPO are sourced from identified, legal, and responsible sources. The identification of potential external suppliers is the responsibility of the Outside Crop Purchaser (OCP) Upstream.</p> <p>Currently, Chersonese POM does not manage a scheme for smallholders. However, information about SD Guthrie's RSG programs can be accessed via their website: https://www.sdguthrie.com/sustainability/responsible-sourcing/</p>	
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) continues to uphold the Responsible Sourcing Guidelines (RSG) when engaging with third-party suppliers of Fresh Fruit Bunches (FFB) and Crude Palm Oil (CPO). This ensures that the fruits and CPO are sourced from identified, legal, and responsible sources. The identification of potential external suppliers is the responsibility of the Outside Crop Purchaser (OCP) Upstream.</p> <p>Currently, Chersonese POM does not manage a scheme for smallholders. However, information about SD Guthrie Berhad's RSG programs can be accessed via their website: https://www.sdguthrie.com/sustainability/responsible-sourcing/</p>	Complied
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) continues to uphold the Responsible Sourcing Guidelines (RSG) when engaging with third-party suppliers of Fresh Fruit Bunches (FFB) and Crude Palm Oil (CPO). This ensures that the fruits and CPO are sourced from identified, legal, and responsible sources. The identification of potential external suppliers is the responsibility of the Outside Crop Purchaser (OCP) Upstream.</p> <p>Currently, Chersonese POM does not manage a scheme for smallholders. However, information about SD Guthrie's RSG</p>	Complied

		programs can be accessed via their website: https://www.sdguthrie.com/sustainability/responsible-sourcing/	
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) continues to uphold the Responsible Sourcing Guidelines (RSG) when engaging with third-party suppliers of Fresh Fruit Bunches (FFB) and Crude Palm Oil (CPO). This ensures that the fruits and CPO are sourced from identified, legal, and responsible sources. The identification of potential external suppliers is the responsibility of the Outside Crop Purchaser (OCP) Upstream.</p> <p>Currently, Chersonese POM does not manage a scheme for smallholders. However, information about SD Guthrie Berhad's RSG programs can be accessed via their website: https://www.sdguthrie.com/sustainability/responsible-sourcing/</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) continues to uphold the Responsible Sourcing Guidelines (RSG) when engaging with third-party suppliers of Fresh Fruit Bunches (FFB) and Crude Palm Oil (CPO). This ensures that the fruits and CPO are sourced from identified, legal, and responsible sources. The identification of potential external suppliers is the responsibility of the Outside Crop Purchaser (OCP) Upstream.</p> <p>Currently, Chersonese POM does not manage a scheme for smallholders. However, information about SD Guthrie Berhad's RSG programs can be accessed via their website: https://www.sdguthrie.com/sustainability/responsible-sourcing/</p>	Complied
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			

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6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>The management has maintained the current Human Rights Charter Revised 2020 and was established to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political 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.</p> <p>The management also has established the Policy on the Protection of Human Rights Defenders (HRDs) approved by Rashyid Redza Anwarudin, Head, Group Sustainability on 25/03/2020.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) recognised 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 relationships with SD Guthrie, in confidence. SD Guthrie also acknowledged that their decision to lodge a complaint may in some instances result in risks to their safety and/or security.</p> <p>The above document are publicly available in the SD Guthrie website the SD Guthrie website (Reports, Policies and Statements SD Guthrie).</p>	Complied
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6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>There is no discrimination against local communities, women, migrant workers based on document reviews and interviews with sampled employees from each operating units based on nationality, gender, age, type of work, race and religious including charging on recruitment fees for foreign workers.</p> <p>The company has provided employment contract for all workers. The employment contract adopts by the estates and mill as part as requirement to ensure the workers employment conditions received as accordingly.</p> <p>Review on the sampled of employment contracts verified terms and conditions outlined as per collective agreement and Employment Act 1955. They have been paid based on piece rates or daily rates as per current minimum wages order and they have rights to choose to do overtime if requested.</p> <p>The management has provided free housing facilities to staff and employees. Basic amenities such as water, electricity, football field etc. were provided to the workers. The housing condition was in accordance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446).</p> <p>There is no recruitment fee has been charges to new foreign workers.</p> <p>There is no complain on discrimination received by the company during the audit period.</p>	Complied
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6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>The company has provided employment contract for all workers. The employment contract adopts by the estates and mill as part as requirement to ensure the workers employment conditions received as accordingly.</p> <p>Review on the sampled of employment contracts verified terms and conditions outlined as per collective agreement and Employment Act 1955. They have been paid based on piece rates or daily rates as per current minimum wages order and they have rights to choose to do overtime if requested.</p> <p>Every employee has his own file which keeps their details including medical history, employment contract, offer letter, confirmation letter, appraisal, etc.</p> <p>It is stated in the letter of appointment that the company practise no discrimination and provide fair treatment to every employee.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>The management has maintained the current Human Rights Charter Revised 2020 and was established to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation, or age. They will facilitate opportunities for advancement for our employees, especially women, by removing</p>	Complied

		<p>barriers to progress and respecting reproductive and maternal rights.</p> <p>The management also has established the Policy on the Protection of Human Rights Defenders (HRDs) approved by Rashyid Redza Anwarudin, Head, Group Sustainability on 25/03/2020.</p> <p>SD Guthrie recognised 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 relationships with SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad), in confidence. SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) also acknowledged that their decision to lodge a complaint may in some instances result in risks to their safety and/or security.</p> <p>The above document are publicly available in the SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) website (Reports, Policies and Statements SD Guthrie).</p> <p>Onsite interviewed with sampled female workers in SOU 2 certification unit informed no pregnancy testing conducted prior to work. They still will be able to offer for work if they are pregnant however with light duty task.</p>	
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>As stated in the Human Rights Charter under clause: 3.2.1 Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating</p>	Complied

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		<p>risk caused by debt bondage and avoiding contract substitution.</p> <p>3.2.5 Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. We will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.</p> <p>3.2.6 Creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) issued Inter-Office Mail (Ref. No.: CEOUM/064/10/2022) dated 11/10/2022 with topic 'Non-conformity on Gender Committee Meeting Frequency' from CEO, Upstream Malaysia' has incorporated its policy on violence and sexual harassment in the "Group Sustainability & Quality Policy Statement" mention in Indicator 4.1.1.2 where the management is committed to prevent sexual harassment and other forms of violence. Interview with gender committee and woman workers representative showed no evidence of sexual harassment or violence happened so far.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established Gender Committee Guidelines, v2 dated</p>	
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		<p>January 2024 approved by Chief Sustainability Officer with revision in all sections of OTR to reflect current practices.</p> <p>The responsibility of the Gender Committee:</p> <ol style="list-style-type: none"> 1. Investigate any complaints of sexual harassment and will recommend appropriate disciplinary action. 2. Keep the confidentiality every record of sexual harassment complaints and actions from every complaint received. 3. Provide advice and counseling to employees who need assistance related to sexual harassment matters. 4. Assist the mill and estate in conducting any form of program/training on the importance of eliminating sexual harassment. <p>The management has established Gender Committee and evident the organization chart for year 2024. Gender committee meeting was conducted as below:</p> <ol style="list-style-type: none"> 1. Tali Ayer Estate dated 29/05/2024. The meeting reminds the objective of gender committee and responsibilities of committee members. As at now there is no report on sexual harassment and violence issue. 2. Chersonese Estate dated 09/07/2024. The meeting reminds the objective of gender committee and responsibilities of committee members and sharing information on Gender Workshop with Women's Aid Organization where the main mission of the organization is to handle any issue related to women and child abuse and gender equality. As at now there is no report on sexual harassment and violence issue. 3. Chersonese POM dated 26/06/2024. The meeting announced the new appoint of chairman, matters arising 	
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		<p>related to housing facilities and as at now there is no issue on sexual harassment and violence.</p> <p>4. Holyrood Estate dated 28/06/2024. Part of the agenda includes the no changes on committee members, briefing on company policy and charter, no report on sexual harassment and violence, new mother assessment, yearly program and other matters.</p> <p>5. Kalumpang Estate dated 17/07/2024. The meeting reminds the objective of gender committee and responsibilities of committee members. As at now there is no report on sexual harassment and violence issue.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	Based on interviewed and payslip reviewed, all workers have been paid equally for the same work scope as per indicator 6.2.2.	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Evident the MAPA Circular No.: 12/2019, from the Malayan Agricultural Procedures Associations dated 02/04/2019.</p> <p>To: Managers of Estates/ Palm Oil Mills/Factories in Membership of:</p> <ol style="list-style-type: none"> 1. MAPA/NUPW Agreement on The Wages of Harvester. Harvesting Kanganies, Loaders, And Other Loaders on Oil Palm Estates, 2019 2. MAPA/NUPW Palm Oil Mill Employees Agreement, 2019 3. MAPA/NUPW Rubber Tappers Wage Agreement, 2019 4. MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019 	Complied

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		Document review on sampled workers' employment contracts, sighted the document been translated with various languages includes English, Hindi, Tamil, Bangladeshi and Bahasa Malaysia/Indonesia. Onsite interview with sampled workers informed upon arrived from home countries, they inducted on the terms and conditions based on employment contract and briefed on the company's policies.	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>The company has provided employment contract for all workers. The employment contract adopts by the estate as part as requirement to ensure the workers employment conditions received as accordingly.</p> <p>Review on the sampled of employment contracts verified terms and conditions outlined as per collective agreement, Employment Act 1955 and the latest Minimum Wages Order.</p> <p>Evident the Inter Office Email on Amendment of Section 60A, Employment Act 1955 – Hours of Work dated 15.12.2022. The amendments of Employment Act 1955 that will take effect from January 2023 which included among others the provision of Section 60A involving hours of work. Other than that the key amendments to the EA that impacted the workers such as Maternity Leave, Sick/Hospitalization leave and Paternity Leave. This amendment was referred as the addendum of the employment contract.</p> <p>The original copy of employment contract was kept by management demonstrated in workers' origin language and signed by the worker.</p> <p>Onsite interview with sampled workers informed they have been briefed on the employment conditions and benefits as stated in employment contract. They have also been handed a copy of the</p>	Complied

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	<p>contract for own selves keeping and reference.</p> <p>Reviewed sampled of workers employment contract, identification card or passport/visit pass and pays lips for November 2023, April 2024 and July 2024 verified paid within minimum wages requirement including number of working days, overtime, bunch weight (harvester), SOCSO, EPF, leaves, and meets Employment Act 1955.</p> <p><u>Tali Ayer Estate</u></p> <p>The samples from Square Root of 281 workers x 0.8 = 14 workers and selected based on gender, age, nationality, race, date join and type of work for:</p> <table><tr><th>Employee no</th><th>Nationality</th><th>Date Join</th><th>Gender</th><th>Type of job</th></tr><tr><td>1xxx1</td><td>Indonesian</td><td>27/01/2024</td><td>Male</td><td>Pruning</td></tr><tr><td>1xxx3</td><td>Indonesian</td><td>27/01/2024</td><td>Male</td><td>Pruning</td></tr><tr><td>1xxx6</td><td>Indonesian</td><td>07/02/2023</td><td>Male</td><td>Cutter</td></tr><tr><td>1xxx4</td><td>Indian</td><td>21/06/2019</td><td>Male</td><td>Cutter</td></tr><tr><td>1xxx7</td><td>Indian</td><td>30/08/2019</td><td>Male</td><td>General Worker</td></tr><tr><td>1xxx0</td><td>Bangladeshi</td><td>21/09/2021</td><td>Male</td><td>General Worker</td></tr></table>	Employee no	Nationality	Date Join	Gender	Type of job	1xxx1	Indonesian	27/01/2024	Male	Pruning	1xxx3	Indonesian	27/01/2024	Male	Pruning	1xxx6	Indonesian	07/02/2023	Male	Cutter	1xxx4	Indian	21/06/2019	Male	Cutter	1xxx7	Indian	30/08/2019	Male	General Worker	1xxx0	Bangladeshi	21/09/2021	Male	General Worker	
Employee no	Nationality	Date Join	Gender	Type of job																																	
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1xxx7	Indian	30/08/2019	Male	General Worker																																	
1xxx0	Bangladeshi	21/09/2021	Male	General Worker																																	

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		1xxx9	Bangladeshi	20/01/2014	Male	General Worker
		1xxx0	Indonesian	01/01/2023	Male	Cutter
		8xxx1	Malaysian (Malay)	08/06/2012	Male	General Worker
		8xxx6	Malaysian (India)	07/06/2012	Female	General Worker
		8xxx8	Malaysian (Malay)	07/06/2012	Female	General Worker
		1xxx3	Nepal	17/09/2014	Male	Cutter
		2xxx2	Malaysian (Malay)	01/04/1996	Female	Mandor Sprayer
		1xxx2	Nepal	14/05/2015	Male	Sprayer
		<u>Chersonese Estate</u>				
		The samples from Square Root of 245 workers x 0.8 = 16 workers and selected based on gender, age, nationality, race, date join and type of work for:				
Employ-ee No	Nationality	Date Joined	Gender	Type of Job		
1xxx7	Indonesian	23/05/2024	Male	LF Collector		

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		1xxx1	Indonesian	23/05/2024	Male	LF Collector	
		1xxx2	Indonesian	24/09/2018	Male	MB/MTG Driver	
		1xxx5	Bangladeshi	21/11/2014	Male	Field Worker	
		1xxx5	Bangladeshi	21/11/2014	Male	Field Worker	
		1xxx6	Indian	07/09/2019	Male	Field Worker	
		1xxx5	Bangladeshi	13/05/2013	Male	Field Worker	
		1xxx1	Indonesian	07/03/2019	Male	Field Worker	
		1xxx8	Indian	05/02/2018	Male	Harvester	
		1xxx2	Nepalese	20/03/2018	Male	Harvester	
		1xxx0	Nepalese	14/05/2015	Male	FronD Stacker	
		1xxx0	Sri Lanka	15/09/2016	Male	FronD Stacker	
		1xxx5	Nepalese	15/09/2016	Male	Field Worker	

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		8xxx7	Malaysian (India)	01/09/2012	Female	General Worker
		2xxx2	Malaysian (Malay)	02/10/2008	Female	General Worker
		2xxx9	Malaysian (Malay)	08/07/1992	Male	Field Worker
		1xxx5	Malaysian (Indian)	09/05/2022	Male	Harvester
		<p><u>Chersonese POM</u></p> <p>The samples from Square Root of 106 workers x 0.8 = 8 workers and selected based on gender, age, nationality, race, date join and type of work and foreign worker at the mill:</p>				
		Employ-ee No	Nationality	Date Joined	Gender	Type of Job
		2xxx9	Malaysian (Indian)	01/07/2002	Male	Shift B - Mill
		5xxx8	Malaysian (Indian)	01/08/2010	Female	General
		1xxx5	Malaysian (Malay)	16/10/2019	Male	General
		1xxx3	Malaysian	02/08/2021	Female	Shift B - Mill

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			(Malay)				
		1xxx5	Malaysian (Malay)	02/03/2022	Male	Shift B - Mill	
		1xxx2	Malaysian (Malay)	01/03/2024	Female	Garden Upkeep	
		2xxx5	Malaysian (Indian)	24/11/2008	Female	Non - Clerical (WB)	
		1xxx5	Malaysian (Malay)	09/03/2020	Male	Non-Clerical (Grader)	
		<p><u>Holyrood Estate</u></p> <p>The samples from Square Root of 101 workers x 0.8 = 8 workers and selected based on gender, age, nationality, race, date join and type of work and foreign worker at the mill:</p>					
		Employ-ee No	Nationality	Date Joined	Gender	Type of Job	
		1xxx7	Indian	02/02/2018	Male	General Worker	
		7xxx2	Malaysian (Malay)	09/01/2012	Male	General Worker	
		1xxx6	Malaysian (Malay)	12/08/2015	Female	General Worker	

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		1xxx1	Indonesian	10/01/2023	Male	Harvester		
		1xxx9	Indonesian	23/05/2024	Male	Harvester		
		1xxx6	Malaysian (Indian)	01/08/2016	Male	Harvester		
		1xxx6	Nepalese	08/12/2014	Male	Field Worker		
		1xxx6	Bangladeshi	19/10/2015	Male	Field Worker		
		<u>Kalumpang Estate</u>						
		The samples from Square Root of 221 workers x 0.8 = 12 workers and selected based on gender, age, nationality, race, date join and type of work and foreign worker at the mill:						
		Employ- ee No	Nationality	Date Joined	Gender	Type of Job		
		2xxx4	Malaysian (Indian)	01/06/1998	Female	General Worker		
		5xxx8	Malaysian (Malay)	01/09/2020	Male	General Worker		
		1xxx8	Bangladeshi	15/09/2015	Male	Harvester		
1xxx0	Bangladeshi	15/09/2015	Male	General				

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						Worker	
		1xxx9	Indonesian	21/05/2018	Male	General Worker	
		1xxx4	Indian	19/12/2018	Male	Harvester	
		1xxx2	Indian	02/01/2019	Male	General Worker	
		1xxx9	Indian	27/06/2019	Male	Field Worker	
		1xxx6	Nepalese	18/12/2017	Male	Harvester	
		1xxx0	Malaysian (Indian)	19/12/2020	Male	Harvesting Mandor	
		1xxx6	Malaysian (Malay)	07/04/2022	Female	GW - Manuring	
		1xxx4	Indonesian	14/11/2022	Male	Harvester	
		<u>Tali Ayer Estate</u> Contractor: Evident the acknowledgement by contractor on the compliance on RSPO/MSPO/SCCS requirements, Vendor Integrity Pledge (VIP) in accordance with the SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) of Mill/Estate. The contractors/vendor was provided with Vendor Code of Business Conduct (VCOBC), February 2023.					

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		<p>Signed on:</p> <ol style="list-style-type: none"> 1. Bxxn Sxxk Enterprise, Txn Cxxg Hxxi signed on 15/07/2024 <p>Contract Agreement:</p> <ol style="list-style-type: none"> 1. Bxxn Sxxk Enterprise – Letter of Extension of FFB Transportation Services for SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) Estate dated 20/03/2024. The agreement valid from 01/04/2024 to 31/12/2024 signed on 27/03/2024. Included in the contract the Schedule of Transport Rates. The Supplement Agreement is made on 01/01/2024 between SD Guthrie and Bxxn Sxxk Enterprise and the term until 31/03/2024. <p>Sampled contractor workers:</p> <ol style="list-style-type: none"> 1. Employment contract dated 02/01/2023 – Mxxxxxd bin Mxd Zxxi (9xxx4-0x-5xx3). The employment shall commence on 01/01/2023 as Lorry Driver. Malaysia Vocational License valid to 04/03/2026 and Malaysian Driving License Renewal Slip valid to 04/03/2026. 2. Employment contract dated 02/01/2023 – Sxxxxl Jxxxxr bin Jxxl (8xxx5-1x-5xx3). The employment shall commence on 01/01/2023 as Lorry Driver. Malaysia Vocational License valid to 25/11/2024 and Driving License valid to 25/11/2024. 3. Employment contract dated 02/01/2023 – Sxxxxxxn A/L Nxxxxxxn (8xxx6-0x-6xx5). The employment shall 	
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		<p>commence on 01/01/2023 as Lorry Driver. Malaysia Vocational License valid to 06/01/2026 and Driving License valid to 06/01/2026.</p> <p>4. Employment contract dated 02/01/2023 – Bxxa A/L Mxxxxxn (7xxx3-0x-6xx5). The employment shall commence on 01/01/2023 as Lorry Driver. Malaysia Vocational License valid to 23/11/2024 and Driving License valid to 23/11/2025.</p> <p>The contract agreement comprises:</p> <ul style="list-style-type: none"> - Commencement of employment and duration - Job title - Place of work and normal working hours (normal working hour 7.5 hours per day and 45 hours per week) - Probationary period – 3 months - Salary – minimum wages RM1500. Before 7th day after each calendar month - Deductions – EPF and SOCSO, EIS - Rest day and Public Holidays - Annual Leave - Sick Leave - Safety and Health - Notification of sickness or other absence - Maternity / Paternity Leave - Notice - Breach and Termination - Other employment - Changes to the terms of employment <p>They have been paid RM1500 monthly as per their employment contract as evident in their payslip for the month of April and May</p>	
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		<p>2024.</p> <p>2. Oxxx Enterprise – Agreement No: E010/2024/002 dated 01/01/2024 between Tali Ayer Estate and Oxxx Enterprise for Rental Lorry and Machineries. The agreement valid from 01/01/2024 to 31/12/2024. Included in the contract the Schedule of Transport Rates.</p> <p>Evident EPF Form A for Oxxx Enterprise, employer code: 0xxx5 (07/2024) and SOCSO, employer code: 0xxxA (06/2024).</p> <p>Sampled contractor workers:</p> <p>1. Employment contract dated 02/01/2023 – Mxxd Axxxl bin Sxxxt (8xxx5-0x-6xx9). The employment shall commence on 02/01/2023 as Excavator Driver. Malaysian Driving License valid to 05/09/2026. Salary rate RM150 per day and piece rate work for drainage cleaning as per agreement. The salary above minimum wages for May and April 2024.</p> <p>2. Employment contract dated 02/01/2023 – Mxxd Axxxl Hxn bin Mxxd Dxn (8xxx6-0x-5xx3). The employment shall commence on 02/01/2023 as Excavator Driver. Malaysian Driving License valid to 06/12/2025. Salary rate RM110 per day and piece rate work for drainage cleaning as per agreement. The salary as per number of working day and piece rate work and applied unpaid leave for a week and has tender resignation on June 2024.</p> <p>The employment contract comprises of date, name, job offer and rate, service period, location of work, working hours, tools,</p>	
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		<p>resignation and termination, safety and health, EPF and SOCSO contributions, annual leave, public holiday, sick leave, maternity leave, unpaid leave, accommodations, medical, rules and regulations, permit/visa (foreigner) and terms and conditions.</p> <p><u>Chersonese Estate</u></p> <p>Contractor sample Rxxn Exxxxxxr as per Letter of Offer and Acceptance Land Preparation for Replanting Oil Palm to Chersonese Estate 58.42HA for Field 202B dated 05/06/2024. The agreement valid to 30/09/2024.</p> <ol style="list-style-type: none"> 1. Acknowledgment compliance on RSPO/MSPO/SCCS has been signed on 01/06/2024. 2. Employment contract – Txxxxxxxxn A/L Pxxxxxxxxu – 7xxx6-0x-6xx3 and salary for the month of June 2024 RM2674.80. 3. EPF, employer code: 1273998 dated 16/07/2024 for 07/2024 4. SOCSO, employer code: 0xxxW for 06/2024 <p><u>Holyrood Estate</u></p> <p>Sampled contractor Axxa Kxxn Exxxxxxxse Letter of Extension of FFB Transportation for SD Guthrie Estate dated 20/03/2024 and the contract valid to 31/12/2024. Other details as follows:</p> <ol style="list-style-type: none"> 1. Acknowledgment compliance on RSPO/MSPO/SCCS has been signed on 17/07/2024. 2. Employment contract – Mxxd Rxxxxi bin Hxxxxn (741004-02-5079) dated 10/10/2023 as driver with basic monthly salary rm2000. Driving License valid to 04/10/2025. June 	
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		<p>Salary RM3415.88 including overtime.</p> <ol style="list-style-type: none"> 3. SOCSO, employer code DxxxY (06/2024) 4. EPF, employer ref: 0xxx0 (07/2024) <p><u>Kalumpong Estate</u></p> <p>Contractor Jxx Txx Enterprise – Agreement no: E162/2024/002 dated 01/01/2024 between SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) – Kalumpong Estate and Jxx Rxx Ent for Rental tractor, lend labour, rubbish collection and general. The agreement valid until 31/12/2024. Other details as follows:</p> <ol style="list-style-type: none"> 1. Acknowledgment compliance on RSPO/MSPO/SCCS has been signed on 01/07/2024. 2. Employment contract – Kxxxxxa Bxxxy Rxx – 8xxx5 dated 01/01/2023 and offer monthly salary rm1500- driving license valid 21.03.2025. June 2024 salary RM 1500 3. Employment contract – Ahxxd Hxxxxxi (Cxxx1 valid to 29/09/2027 and visa till 20/11/2024) dated 01/01/2023 with minimum wages rm1500 offered. June 2024 salary RM 1500 4. Employment contract – Dxxxxxxy A/L Cxxxxxh 6xxx7 dated 01/01/2023 offered minimum wages, Malaysia driving license valid 03/12/2025. June 2024 salary RM 1500 5. Employment contract – Sxxxxli (Cxxx5 valid to 27/09/2027 and visa till 20/11/2024) dated 01/01/2023 with minimum wages rm1500 offered. June 2024 salary RM 1500 6. KWSP – employer ref no: 0xxx0 07/2024. 7. SOCSO employer code: DxxxF 	
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6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>All estates have registered all their workers into Employee Master Details List. All the daily attendance and overtime work were recorded in the Daily attendance record and payroll system. The wages details were attached in the payslip including the overtime, harvesting bunch weights, allowance, number of working day (on normal day, rest day, public holiday, annual leave, sick leave, unpaid leave, absent, etc).</p> <p>Onsite interview with sampled workers informed working hours, break time, deductions, overtime, sickness, holiday entitlement, maternity leave, and others is according to employment contract and employment act. Overtime offered to workers is voluntarily upon mutually agreement between management and workers including compliance by contractor as per their Letter of Award. Refer 6.2.2</p>	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The company has established Workers Housing Management Procedure 2022, Ver.01, dated 30/06/2022 as guidelines to continuously improve of living standards of their employee in estates and mill operations. Its shown company commitment in managing employee's housing repair and maintenance through digital platform named Digital Housing Complaint system or 'OilPalmPal'.</p> <p>To provide guidance to management in providing a safe, livable workers housing condition in accordance with Workers Minimum Standard of Housing & Amenities (Amendment) 2091 (Act A 1604). To integrate all past policies related to workers housing & amenities management in the operating units.</p>	Complied

		<p>The estates have provided free housing facilities to staff and employees. Basic amenities such as water, electricity, football field etc. were provided to the workers. The housing condition was in accordance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) and the management in the process of upgrading the workers quarters phase by phase.</p> <p>Interview with the workers confirmed that they did not have any complaint or grievance related to housing to be reported.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There is sundry shop inside the estate and there is nearest town from the estate and mill. Some of the operating units provide transport to the nearest town. The workers have alternative to take bus or taxi to the town.</p> <p>The management has contributed 10 kg of rice once every 2 months for all their workers as evident in the payslip. Apart from that, all the workers are provided with free medical facilities located at the estate or nearby panel clinic. In additional, all the workers are entitled with the phone allowance of RM5 for every month. Free housing facilities were provided to all the workers and their families such as subsidised electricity and water (35gallons), mosque, temples, hall, playground, creche, kindergarten, school bus, allowances, bonuses, etc.</p> <p>The gender committee actively cooperates with Government Clinic (Klinik Kesihatan) for female annual medical check-up such as Pap-smear.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the</p>	<p>SOU 2 certification unit management established, maintain, and update the prevailing wage calculation to include all the in-kind</p>	Complied

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<p>calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam. These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed 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</p>	<p>benefits provided to the workers.</p> <p>The headquarters will collaborate with SOU 2 certification unit in management on updating the decent living wage for both local and foreign workers based in Prevailing Wages assessment.</p> <p>The assessment includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, transport, telecommunication.</p> <p>Based Prevailing Wage Assessment (MYR) is based on workers monthly wages calendar year. The assessment includes with wages, service bonus, meals, housing, health facilities, sport/recreation, education, creche, welfare, transport, and telecommunication.</p> <p>Latest update for the assessment is based on check roll workers for period of July 2024, check roll operating unit for period of January until December 2023, HR Department inputs and denominator of total head count (workforce - 1005, workers - 878, local worker - 325 and foreign workers - 553).</p> <p>Remarkd on the assessment, stated until housing basket can be determined (work in progress-data type need to pull from various departments and further segregated) and the total received per month:</p> <ol style="list-style-type: none"> 1. Local – RM2195.62 2. Foreign – RM2765.48 	
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	<p>shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> Updated assessment on prevailing wages and in-kind benefits There is annual progress on the implementation of living wages Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>SOU 2 certification unit management adopted the company employment contracts includes with the details of payments and conditions of employment to the permanent workers employed as per samples sighted in indicator 6.2.2 above.</p> <p>Document review on workers master list, sighted no casual, temporary and day labour employed within all operating units within SOU 2 certification unit management.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The company has established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They respect the rights of their employees to form and join unions and bargain collectively.</p>	Complied

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		<p>Social Dialogue was carried out by the management with workers to update the progress of action taken for the issues raised by workers. The initiative will discuss during management review meeting and action taken accordingly. All issues will be uploaded into Social Dialogue Online Tracker System (SDOTS) for monitoring.</p> <p>Evident the MAPA Circular No.: 12/2019, from the Malayan Agricultural Procedures Associations dated 02/04/2019.</p> <p>To: Managers of Estates/ Palm Oil Mills/Factories in Membership of:</p> <ol style="list-style-type: none"> 1. MAPA/NUPE Agreement on the wages of harvester. Harvesting kanganies, loaders, and other loaders on oil palm estates, 2019 2. MAPA/NUPW Palm oil mill employees Agreement, 2019 3. MAPA/NUPW Rubber tappers wage agreement, 2019 4. MAPA/NUPW field and other general employees and fringe benefits agreement, 2019 	
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>Verified the records of monitoring of issues and evidence of actions taken to resolve the issues raised by the workers. The workers that involved in the Social Dialogue were NUPW representatives, Gender Committee representatives and others' nationalities representatives.</p> <p>The social dialogue has been conducted as below and all matters arising has been verified, closed and in progress for capex approval as per sample:</p> <ol style="list-style-type: none"> 1. Chersonese Estate – 15/07/2024, 21/06/2024, 20/05/2024 2. Holyrood Estate – 28/06/2024, 28/05/2024 	Complied

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		<p>3. Kalumpong Estate - 24/05/2024, 24/04/2024, 26/03/2024</p> <p>The estates management allowed their workers to form or join any association such as NUPW. Document reviewed on their payslip found that they are deducted for the NUPW subscription fees monthly.</p> <p>Evident the NUPW Minutes Meeting and all matters arising has been verified, closed and in progress for capex approval as per sample:</p> <ol style="list-style-type: none"> 1. Tali Ayer Estate – 25/07/2024. Streetlamp at main road does not function. The management informed the installation process still in progress by TNB and targeted to be completed by September 2024. 2. Chersonese Estate – 02/02/2024. No matters arising during the meeting. 3. Chersonese POM – 17/07/2024. Requests from the management to open gate to near estate as an alternative road to housing area, etc. 4. Holyrood Estate - 20/03/2024. Requests on advance during Eid Ul Fitr. 5. Kalumpong Estate – 04/04/2024. Requests from worker to management to repair main road using crusher run stones and to add more fans. 	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	As confirmed by sample workers representatives and workers themselves during on-site interview, the estates management allowed them to form or join any association such as NUPW. Document reviewed on their payslip found that they are deducted for the monthly NUPW subscription fees.	Complied

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	<p>- Minor compliance -</p>	<p>NUPW Committee</p> <p><u>Tali Ayer Estate</u> Evident the Letter from National Union of Plantation Workers, Perak Branch with Subject: NUPW Committee. The letter mentioned and informed that meeting held at the Tali Ayer Estate on 14/08/2018 and 9 were elected by the members OF NUPW to represent other as NUPW Committee members.</p> <p><u>Chersonese Estate</u> Evident the Letter from National Union of Plantation Workers, Perak Branch with Subject: NUPW Committee. The letter mentioned and informed that meeting held at the Chersonese Estate on 08/03/2024 and 14 were elected by the members OF NUPW to represent other as NUPW Committee members including local rep, Bangladeshi rep, Indonesian rep, Nepalese rep and Sri Lankan rep.</p> <p><u>Chersonese POM</u> Evident the Letter from National Union of Plantation Workers, Perak Branch with Subject: NUPW Committee. The letter mentioned and informed that meeting held at the Chersonese Estate on 14/03/2022 and 7 were elected by the members OF NUPW to represent other as NUPW Committee members.</p> <p><u>Holyrood Estate</u> Evident the Letter from National Union of Plantation Workers,</p>	
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		<p>Perak Branch with Subject: NUPW Committee. The letter mentioned and informed that meeting held at the Chersonese Estate on 19/01/2022 and 5 were elected by the members OF NUPW to represent other as NUPW Committee members including local rep and Bangladeshi rep.</p> <p><u>Kalumpang Estate</u></p> <p>Workers rep by nationality was elected by the workers:</p> <ol style="list-style-type: none"> 1. Indonesia – Axxxxxxxxn, Sxxxxn, Jxxxxr, Axxxd Jxxxxi and Hxxm Axxxi 2. India – Sxxxxh Dxx, Sxxxxa Mxxxxl, Pxxxxj Kxxxxr Sxxxxh, Rxxu Mxxxxl and Bidyaxxxxr Kxxxxj 3. Bangladesh – Mxxn, Rxxn Hxxxxn, Mxxu, Md Ubxxxxa and Md Hxxxxn Mxx 	
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The company has established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They 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 child labour in all their supply chain and not employ anyone underage of 18 years.</p> <p>Document review workers master list confirmed, all operating units have not employed any child labour in the operations.</p>	Complied

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		On-site interview with sample internal and external stakeholders confirmed that the formal policy for the protection of children, including prohibition of child labour and remediation are in place. These were also included into service contracts based on verified sample agreement for transportation as per Letter of Extension of Transportation Services for Crude Palm Oil (CPO); Period: 01/11/2023 – 31/10/2024; Contract ref. # T/SDPB/PEN/CPO/0720/003; Date: 12/12/2020; Contractor/Transporter: Mxxx Bxxx Sdn. Bhd.	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The company has established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They 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 child labour in all their supply chain and not employ anyone underage of 18 years.</p> <p>Document review workers master list confirmed, all operating units have not employed any child labour in the operations.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>The company has established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation,</p>	Complied

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		<p>including child sex tourism, child trafficking and child pornography. They are eradicating child labour in all their supply chain and not employ anyone underage of 18 years.</p> <p>Document review workers master list confirmed, all operating units have not employed any child labour in the operations.</p>	
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>SOU 2 certification unit managements continuously implemented the practices ensures no young with aged below 18 years old are employed as evident in the employee master list.</p> <p>Onsite interviewed with external stakeholders among vendors, FFB suppliers and local communities as well as internal stakeholders among both estates and mill sampled workers, it was confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them.</p>	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement 'Kenyataan Dasar Kelestarian & Kualiti Kumpulan' shall be guided by the Human Rights Charter.</p> <p>As stated in the Human Rights Charter under clause: 3.2.1 Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. 3.2.5 Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the</p>	Complied

		<p>grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. We will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.</p> <p>3.2.6 Creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) issued Inter-Office Mail (Ref. No.: CEOUM/064/10/2022) dated 11/10/2022 with topic 'Non-conformity on Gender Committee Meeting Frequency' from CEO, Upstream Malaysia' has incorporated its policy on violence and sexual harassment in the "Group Sustainability & Quality Policy Statement" mention in Indicator 4.1.1.2 where the management is committed to prevent sexual harassment and other forms of violence. Interview conducted with sample workforce of all levels among management, workers and workers' representatives including gender committee and woman workers representative confirmed that the policy were communicated accordingly.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established Gender Committee Guidelines, v2 dated January 2024 approved by Chief Sustainability Officer with revision in all sections of OTR to reflect current practices.</p> <p>The responsibility of the Gender Committee:</p> <ol style="list-style-type: none"> 1. Investigate any complaints of sexual harassment and will 	
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		<p>recommend appropriate disciplinary action.</p> <ol style="list-style-type: none"> 2. Keep the confidentiality every record of sexual harassment complaints and actions from every complaint received. 3. Provide advice and counseling to employees who need assistance related to sexual harassment matters. 4. Assist the mill and estate in conducting any form of program/training on the importance of eliminating sexual harassment. <p>Training to workers on company policies and procedures: Tali Ayer Estate – 17/01/2024 – briefing on Employment Act, Minimum Wages Order, 11 ILO indicators, employment contract, grievance channel, pay slip, VIP & COBC, OPP, PPE, HRC & HRDF and Policy of SD Guthrie.</p> <p><u>Chersonese Estate</u></p> <ol style="list-style-type: none"> 1. Refresher on ergonomic management during work, ILO Compliance, Suara Kami and whistleblowing channel including Esime for safety – 11/09/2023 and 13/02/2024 2. Sexual Harassment Policy – 06/01/2023 3. 11 Indicator ILO, Visa and Grievance Channel – 26/11/2023 4. OPP as medium for housing grievances and complaints – 02/01/2024 <p>Holyrood Estate – 13/01/2024 (Main Div) and 17/01/2024 (Bukit Rhona Div). Refresher briefing on ILO Indicators, passport safe keeping, social dialogue, medical access, OSH, freedom of movement, housing OPP, grievance channel, wages structure,</p>	
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		physical and sexual abuse, HRDF, COBC and employment contract.	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement 'Kenyataan Dasar Kelestarian & Kualiti Kumpulan' shall be guided by the Human Rights Charter.</p> <p>As stated in the Human Rights Charter under clause:</p> <p>3.2.1 Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution.</p> <p>3.2.5 Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. We will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.</p> <p>3.2.6 Creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) issued Inter-Office Mail (Ref. No.: CEOUM/064/10/2022) dated 11/10/2022 with topic 'Non-conformity on Gender Committee Meeting Frequency' from CEO, Upstream Malaysia' has incorporated its policy on violence and sexual harassment in the "Group Sustainability & Quality Policy Statement" mention in Indicator 4.1.1.2 where the management is committed to prevent</p>	Complied

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		<p>sexual harassment and other forms of violence. Interview conducted with sample workforce of all levels among management, workers and workers' representatives including gender committee and woman workers representative confirmed that the policy were communicated accordingly.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established Gender Committee Guidelines, v2 dated January 2024 approved by Chief Sustainability Officer with revision in all sections of OTR to reflect current practices.</p> <p>The responsibility of the Gender Committee:</p> <ol style="list-style-type: none"> 1. Investigate any complaints of sexual harassment and will recommend appropriate disciplinary action. 2. Keep the confidentiality every record of sexual harassment complaints and actions from every complaint received. 3. Provide advice and counseling to employees who need assistance related to sexual harassment matters. 4. Assist the mill and estate in conducting any form of program/training on the importance of eliminating sexual harassment. <p>Training to workers on company policies and procedures:</p> <p>Tali Ayer Estate – 17/01/2024 – briefing on Employment Act, Minimum Wages Order, 11 ILO indicators, employment contract, grievance channel, pay slip, VIP & COBC, OPP, PPE, HRC & HRDF and Policy of SD Guthrie.</p> <p><u>Chersonese Estate</u></p> <ol style="list-style-type: none"> 1. Refresher on ergonomic management during work, ILO 	
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		<p>Compliance, Suara Kami and whistleblowing channel including Esime for safety – 11/09/2023 and 13/02/2024</p> <ol style="list-style-type: none"> 2. Recruit Sexual Harassment Policy – 06/01/2023 3. 11 Indicator ILO, Visa and Grievance Channel – 26/11/2023 4. OPP as medium for housing grievances and complaints – 02/01/2024 <p>Holyrood Estate – 13/01/2024 (Main Div) and 17/01/2024 (Bukit Rhona Div). Refresher briefing on ILO Indicators, passport safe keeping, social dialogue, medical access, OSH, freedom of movement, housing OPP, grievance channel, wages structure, physical and sexual abuse, HRDF, COBC and employment contract.</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 management has conducted the Assessment for New Mothers with infants under 24 months FY 2024. Evident the record as below:</p> <ol style="list-style-type: none"> 1. Tali Ayer Estate – 17/01/2024 and 14/05/2024. There are 5 workers has been assessed during the year and the main necessity is baby sitting at NEST or creche and baby breastfeeding time. 2. Chersonese Estate – 02/01/2024. There are 2 workers have been assessed and as at now the baby is take care by babysitter nearby and they allowed for breastfeeding time. 3. Chersonese POM – 26/06/2024. No new mother with infants below 24 months to be assessed. 4. Holyrood Estate – 28/06/2024. Mentioned in the Gender Committee Meeting there is no new mother with infants below 24 months to be assessed. 	Complied

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		5. Kalumpong Estate - 17/07/2024. Mentioned in the Gender Committee Meeting there is no new mother with infants below 24 months to be assessed.	
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	As per Gender Committee Guidelines under clause 4: Reporting of Sensitive Issues: 4.1: In the event where the Gender Committee Chair or any of the GC members receive complaints/grievances or incidents of sensitive nature such as cases to sexual harassment, domestic abuse and children in the OU, Gender Committee shall report to the OU Manager directly for next actions to report to the Regional HR Manager. Interview conducted with sample workforce of all levels among management, workers and workers' representatives including new mothers confirmed that the management has implemented and maintained the grievance mechanism accordingly.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited: <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty for termination of employment Debt bondage 	The management has maintained the current Human Resource Department established Hiring of Local Workers procedure with Doc. No.: 01- 12-19 dated 01/12/2019. Evident the current Migrant Worker Responsible Recruitment Procedure updated on 20/08/2021. Document review on application form, employment interview assessment form, medical check-up report, offer letter and employment contract at Chersonese POM, Kalumpong Estate, Chersonese Estate, Tali Ayer Estate and Holyrood Estate are available for both local and foreign workers in their personal files. A copied of identification card, driving license, passport and work permit were kept as record. Evident in the SD Guthrie website:	Complied

	<ul style="list-style-type: none"> • Withholding of wages - Critical (Major) compliance - 	<p>(https://www.sdguthrie.com/sustainability/human-rights/)</p> <p>commitment on Ethical Recruitment:</p> <p>Approximately 70% of our workforce in Malaysia are migrant workers from various countries. We recognise that the recruitment practices in place may be abused thus exposing our workers to risks such as modern-day slavery and exploitation. For this reason, we have been actively seeking solutions to enhance the migration experience for our workers through Responsible Recruitment practices, which include:</p> <ol style="list-style-type: none"> 1. No Recruitment fees – Our core principle of zero-cost means no worker should pay for a job. SD Guthrie shall bear all the costs of recruitment. The Group has reimbursed most of its foreign workers currently within its employ who may have paid recruitment fees to secure employment with the Group. 2. No retention of documents – We do not withhold or detain workers' passports or personal documents. 3. No contract substitution – Workers' agreements to the terms and conditions of recruitment and employment is voluntary and free from deception or coercion. <p>We appoint ethical recruitment agents and protect workers from any form of coercion, intimidation, or deception in the process of seeking employment in SD Guthrie.</p> <p>Historic recruitment fees (unreported payments charged by agents, sub-agents or other third parties to SD Guthrie's foreign workers in countries of origin, in contravention of SD Guthrie's zero recruitment fee policy) reimbursed to current and former workers.</p> <p>Recruitment policies, processes and practices have effective due diligence systems in place to ensure ethical recruitment.</p>	
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		<p>All workers are in possession of their own personal documents and have individual, secure lockers within their own accommodation to keep them.</p> <p>During site visit, document review and interview with workers, all workers voluntaries enter the job. Foreign workers kept their own passport in the locker as evident during site tour to worker quarters. The renewal of passport and visa will be paid by the management. Interview with new intake workers for year 2024 from Indonesia, there is no payment being charged by the recruitment agent appointed by the company and all expenses including FOMEMA, passport, flight tickets were provided by the management and all workers aware and has been interview for oil palm plantation job and there is no contract substitution. When arrived at the operating unit they will be given RM150 for first month expenses and the operating units have provided the house, bed, locker, stove, and gas for free.</p> <p>The company has provided employment contract for all workers. The employment contract adopts by the estate as part as requirement to ensure the workers employment conditions received as accordingly. Review on the sampled of employment contracts verified terms and conditions outlined as per collective agreement, Employment Act 1955 and the latest Minimum Wages Order.</p> <p>All workers informed that they have option to resign if there is an emergency based on company judgement if less than 15 months as per employment contract. There is no debt bondage or withholding wages. All workers will be given 10kg rice every two months. All workers satisfied with the benefits received from the company. It shown from the period of service of local and foreign workers.</p>	
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6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The management has established the Migrant Worker Responsible Recruitment Procedure dated August 2024 approved by Rashyid Redza Anwarudin, Chief Sustainability Officer. This Responsible Recruitment Procedure outlines the steps taken to ensure there is/are:</p> <ul style="list-style-type: none"> (a) no forced or bonded labour or human trafficking (b) no debt bondage in any form, including due to the charging of recruitment fees and related costs¹ (c) clear and transparent terms and conditions of employment (d) no withholding of passports or personal documents (e) non-discriminatory practices in the recruitment process <p>This approach respects the rights of workers through the provision of fair and beneficial hiring and working conditions.</p> <p>During site visit, document review and interview with workers, all workers voluntaries entered the job. Foreign workers kept their own passport in the locker as evident during site tour to worker quarters. The renewal of passport and visa will be paid by the management. Interview with new intake workers for year 2024 from Indonesia, there is no payment being charged by the recruitment agent appointed by the company and all expenses including FOMEMA, passport, flight tickets were provided by the management and all workers aware and has been interview for oil palm plantation job and there is no contract of substitution. When arrived at the operating unit they will be given RM150 for first month expenses and the operating units have provided the house, bed, locker, stove, and gas for free.</p>	Complied
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		<p>The company has provided employment contract for all workers. The employment contract adopts by the estate as part as requirement to ensure the workers employment conditions received as accordingly. Review on the sampled of employment contracts verified terms and conditions outlined as per collective agreement, Employment Act 1955 and the latest Minimum Wages Order.</p> <p>All workers informed that they have option to resign if there is an emergency based on company judgement if less than 15 months as per employment contract. There is no debt bondage or withholding wages. All workers will be given 10kg rice every two months. All workers satisfied with the benefits received from the company. It shown from the period of service of local and foreign workers.</p>	
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>All estates and mill management has established a Safety Committee, with members including a secretary, representatives from both the employer and employees. These appointments are in line with the appointment letter issued by the Estate Manager. The quarterly meeting agenda covers items such as matters arising from the previous meeting, reports from workplace inspections, updates on the training program and its implementation, discussions on safety issues in the workplace, review of accident cases, consideration of HIRARC, and other safety-related concerns.</p> <p>Reviewed latest safety minutes meeting for operating unit:</p>	Complied

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		Operating Unit	3 rd meeting (2023)	4 th meeting (2023)	1 st meeting (2024)	2 nd meeting (2024)	
		Tali Ayer Estate	22/09/2023	22/12/2023	22/03/2024	21/06/2024	
		Chersonese Estate	08/09/2023	06/12/2023	04/03/2024	05/06/2024	
		Chersonese POM	21/08/2023	18/11/2023	19/02/2024	20/05/2024	
		Holyrood Estate	20/09/2023	20/12/2023	20/3/2024	21/06/2024	
		Kalumpang Estate	15/09/2023	15/12/2023	15/03/2024	14/06/2024	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency protocols have been established, including the formation of an Emergency Response and Preparedness (ERP) Team for identified incidents. These procedures, encompassing fire, chemical spillage, flood, and workplace accidents, have been condensed into a flowchart and prominently displayed for all estate and mill employees. Detailed instructions can be found in the Emergency Preparedness & Response Procedures dated 17/11/2021 (reference number UM/HSE/SP/02) and the Standard Operating Procedure for Incidents, Accidents & Non-Compliance Management dated 01/05/2022 (reference number SDP/GSHSE/SP/01).</p> <p>The ERP team's organizational chart has been established and shared with employees, accompanied by essential telephone contact information. Guidelines were issued by the SPO (presumably Safety and Preparedness Officer) and adapted to suit variations in the situations within the estates and mill.</p>					Complied

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		<p>Verified training related to ERP was conducted as table below:</p> <table><tr><th>Operating Unit</th><th>Date</th></tr><tr><td>Tali Ayer Estate</td><td>03/07/2024</td></tr><tr><td>Chersonese Estate</td><td>13/06/2024</td></tr><tr><td>Chersonese POM</td><td>28/06/2024</td></tr><tr><td>Holyrood Estate</td><td>18/05/2024</td></tr><tr><td>Kalumpong Estate</td><td>25/04/2024</td></tr></table> <p>It was noted that Emergency Response Team for each supply base was updated as per Jan 2024. The team was divided into 6 sub-team which are firefighting team, security team, chemical spillage team, accident team, haze team and flood control team.</p> <p>Monthly First Aid inspection record and updates was conducted by each Medical Assistant (MA) as table below:</p> <table><tr><th>Certification Unit</th><th>Date of Latest Monthly Inspection</th></tr><tr><td>Tali Ayer Estate</td><td>25/07/2024</td></tr><tr><td>Chersonese Estate</td><td>26/07/2024</td></tr><tr><td>Chersonese POM</td><td>18/07/2024</td></tr><tr><td>Holyrood Estate</td><td>24/07/2024</td></tr><tr><td>Kalumpong Estate</td><td>02/08/2024</td></tr></table>	Operating Unit	Date	Tali Ayer Estate	03/07/2024	Chersonese Estate	13/06/2024	Chersonese POM	28/06/2024	Holyrood Estate	18/05/2024	Kalumpong Estate	25/04/2024	Certification Unit	Date of Latest Monthly Inspection	Tali Ayer Estate	25/07/2024	Chersonese Estate	26/07/2024	Chersonese POM	18/07/2024	Holyrood Estate	24/07/2024	Kalumpong Estate	02/08/2024	
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		The operating units consistently document accident-related information, including JKPP 6 forms submitted to the Department of Safety & Health, medical leave certificates, accident investigation reports, and reviews of Hazard Identification, Risk Assessment, and Risk Control (HIRARC). According to JKPP 8 submission report for year 2023, it was confirmed that all accidents were reported, and LTA was calculated accordingly.	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units supply Personal Protective Equipment (PPE) to workers in accordance with Safety Work Procedures and recommendations derived from risk assessment reports, including Chemical Hazard Risk Assessments (CHRA) and Noise Risk Assessments (NRA).</p> <p>All estate ensures that all workers receive appropriate Personal Protective Equipment (PPE) based on their job types.</p> <p><u>Tali Ayer Estate</u></p> <p>During a site visit at P14A, it was observed that Interrow Sprayers were equipped with safety helmets, aprons, mask, goggle, and wellington boots as per HIRARC documents.</p> <p><u>Chersonese Estate</u></p> <p>Site visit and interview session with Circle Sprayers at P22A confirmed that harvesters provided with PPE such as safety helmets, aprons, mask, goggle, and wellington boots as per HIRARC documents.</p> <p><u>Chersonese POM</u></p> <p>Site visit and observation at Ramp Station, Sterilizer Station and Boiler Station found that workers wore appropriate PPE as per</p>	Complied

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	<p>recommended by PPE matrix accordingly.</p> <p><u>Holyrood Estate</u></p> <p>Site visit and interview session with Manuring Activity at P17B confirmed that manurers were provided with PPE such as safety helmets, aprons, mask, goggle, and wellington boots as per HIRARC documents.</p> <p><u>Kalumpong Estate</u></p> <p>Site visit and interview session with Spraying Activity (ST-Gio) at P02 confirmed that sprayers and tractor driver were provided with PPE such as safety helmets, aprons, mask, goggle, and wellington boots as per HIRARC documents.</p> <p>The PPE issuance records for all certification units have been reviewed and verified. These records are updated for each worker accordingly. Interview session with workers at each operating units confirmed that the records are consistent with on-site observations.</p> <p>The estate conducts PPE inspections at least once every six months, as evidenced by the inspection records reviewed as table below:</p> <table><tr><th>Certification Unit</th><th>Activity Inspected</th><th>Date</th></tr><tr><td>Tali Ayer Estate</td><td>Spraying</td><td>01/06/2024</td></tr><tr><td>Chersonese Estate</td><td>Harvesting</td><td>18/06/2024</td></tr><tr><td>Chersonese POM</td><td>Boiler</td><td>21/06/2024</td></tr></table>	Certification Unit	Activity Inspected	Date	Tali Ayer Estate	Spraying	01/06/2024	Chersonese Estate	Harvesting	18/06/2024	Chersonese POM	Boiler	21/06/2024	
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		<table><tr><td>Holyrood Estate</td><td>Manurer</td><td>07/07/2024</td></tr><tr><td>Kalumpang Estate</td><td>Spraying (ST-Gio)</td><td>30/07/2024</td></tr></table>	Holyrood Estate	Manurer	07/07/2024	Kalumpang Estate	Spraying (ST-Gio)	30/07/2024																			
Holyrood Estate	Manurer	07/07/2024																									
Kalumpang Estate	Spraying (ST-Gio)	30/07/2024																									
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Noted that all employees receive medical care known as SOCSO contribution, and a review of workers' profile records indicates that every worker is covered by accident insurance.</p> <table><tr><td>Certification Unit</td><td>Month</td><td>Total Workers</td><td>Amount</td></tr><tr><td>Talk Ayer Estate</td><td>July 2024</td><td>281</td><td>RM16,108.60</td></tr><tr><td>Chersonese Estate</td><td>July 2024</td><td>272</td><td>RM15,675.40</td></tr><tr><td>Chersonese POM</td><td>July 2024</td><td>106</td><td>RM6,755.30</td></tr><tr><td>Holyrood Estate</td><td>July 2024</td><td>109</td><td>RM5,952.10</td></tr><tr><td>Kalumpang Estate</td><td>July 2024</td><td>243</td><td>RM12,695.30</td></tr></table>	Certification Unit	Month	Total Workers	Amount	Talk Ayer Estate	July 2024	281	RM16,108.60	Chersonese Estate	July 2024	272	RM15,675.40	Chersonese POM	July 2024	106	RM6,755.30	Holyrood Estate	July 2024	109	RM5,952.10	Kalumpang Estate	July 2024	243	RM12,695.30	Complied
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6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of accidents were documented accordingly. It was verified that Records of Lost Time Accident (LTA) metrics were consistently maintained. Observed samples of accident statistics for Year 2023 as reported to DOSH are as follows:</p> <table><tr><td>Operating Unit</td><td>Accidents Reported</td><td>Lost Time Accident (LTA)</td><td>Reference No.</td></tr><tr><td>Talk Ayer Estate</td><td>4</td><td>22 days</td><td>JKKP 8/152898/2023</td></tr></table>	Operating Unit	Accidents Reported	Lost Time Accident (LTA)	Reference No.	Talk Ayer Estate	4	22 days	JKKP 8/152898/2023	Complied																
Operating Unit	Accidents Reported	Lost Time Accident (LTA)	Reference No.																								
Talk Ayer Estate	4	22 days	JKKP 8/152898/2023																								

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		Chersonese Estate	5	59 days	JKKP 8/153036/2023	
		Chersonese POM	-	-	JKKP 8/123211/2023	
		Holyrood Estate	-	-	JKKP 8/167219/2023	
		Kalumpong Estate	3	12	JKKP 8/158976/2023	
Principle 7: Protect, conserve and enhance ecosystems and the environment						
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.						
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	<p>The estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans. a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides.</p> <ul style="list-style-type: none"> Planting beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, along the roadsides and designated points in the fields and within the nursery perimeter. Establishment of single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. Census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year were recommended by the GM /Agronomist. Baiting is continued until bait acceptance threshold level. 				Complied
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent	This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org				Complied

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	and monitor their spread are implemented. - Minor compliance -	are used in the management of IPM. The estates have declared this compliance in the status of IPM species invasiveness.	
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 -	As outlined in SD Guthrie Berhad Group's Sustainability and Quality Policy, signed by the Group Managing Director on 02/12/2019 and Responsible Agriculture Charter, all estates mandates zero tolerance for fire use, effective monitoring and prevention systems, and protective firefighting measures to protect forests and wildlife and minimize carbon emissions. It also emphasizes the establishment of effective monitoring and prevention systems to ensure adherence to this policy as well as aims to safeguard the environment, support biodiversity, and contribute to the overall sustainability goals of the SD Guthrie Berhad. As per visit at each estate, there is no traces of evidence of fire usage for pest control observed.	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	Agrochemical usage adhered to the Standard Operating Procedure outlined in the Agricultural Reference Manual (ARM), SOP, and the Safety Pictorial Book provided by SD Guthrie Berhad. Please refer to the Sime Darby Agricultural Reference Manual, (ARM), 3 rd Edition, date issued 06/12/2023. The selection of products was tailored to address the specific target pest, weed, and disease. Sighted and reviewed chemical register and confirmed that all operating units confined usage to only class II, class III & class IV pesticides.	Complied
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	Records of pesticides used (including active ingredients used and their Lethal Dosage (LD 50), area treated, amount of a.i applied per ha and number of applications) is maintained by the estate. Sighted Monitoring Record Pesticide Use Per Ha FY2023. Average	Complied

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	- Critical (Major) compliance -	<div>data as per estates below:</div> <table><tr><th>a.i/ha (2024)</th><th>Tali Ayer Estate</th><th>Chersonese Estate</th><th>Holyrood Estate</th><th>Kalumpong Estate</th></tr><tr><td>Jan</td><td>0.136</td><td>0.669</td><td>0.016</td><td>0.68</td></tr><tr><td>Feb</td><td>0.127</td><td>0.167</td><td>0.046</td><td>0.24</td></tr><tr><td>Mar</td><td>0.139</td><td>0.624</td><td>0.100</td><td>0.61</td></tr><tr><td>Apr</td><td>0.125</td><td>0.731</td><td>0.052</td><td>0.46</td></tr><tr><td>May</td><td>0.175</td><td>0.909</td><td>0.225</td><td>0.33</td></tr><tr><td>June</td><td>0.050</td><td>0.366</td><td>0.216</td><td>0.72</td></tr></table>	a.i/ha (2024)	Tali Ayer Estate	Chersonese Estate	Holyrood Estate	Kalumpong Estate	Jan	0.136	0.669	0.016	0.68	Feb	0.127	0.167	0.046	0.24	Mar	0.139	0.624	0.100	0.61	Apr	0.125	0.731	0.052	0.46	May	0.175	0.909	0.225	0.33	June	0.050	0.366	0.216	0.72	
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>All pesticides used were those officially registered under the Pesticide Act 1974. The selection of products was tailored to address the specific target pest, weed, and disease.</p> <p>Sighted and reviewed chemical register and confirmed that all operating units confined usage to only class II, class III & class IV pesticides.</p> <p>IPM Plan for all three estates were reviewed. Examples of programmed conducted are increasing number of barn owl nest, addition of plot for beneficial plants and increasing amount of EFB to be applied in estates.</p>	Complied																																			

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7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	No prophylactic use of pesticides can be identified during site visit and confirmation with Chemical Register updated on 01/01/2024	Complied
7.2.5	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. The due diligence refers to: a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance -	Observation at chemical store and documents verification via Chemical Register affirmed that there no Class 1A and Class 1B chemical has been utilized in estate and mill operation activities. Chemical ingredients commonly used are glyphosate, metsulfuron methyl, triclopyr which categorized as Class II, Class III and Class IV chemicals. Other examples of chemical used are as listed below: <ul style="list-style-type: none"> • Supremo 41 – Glyphosate Isoprpylamine • Ancom Sodium Chlorate – Sodium Chlorate • Racumin – Coumatertraly • Monex – Diuron • Tri ester – Triclopyr Butoxy Ethyl • Canyon 20 – Metsulfuron methyl 	Complied
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out. - Critical (Major) compliance -	Pesticide operators have undergone training concerning the safe and health-conscious usage, as well as the proper application methods of chemicals. Additionally, they regularly participate in monthly health surveillance conducted by the Medical Assistant. List of training conducted for each estate as details below: <ul style="list-style-type: none"> • Tali Ayer Estate: Refresher Training on Chemical Handling, HIRARC, E-Sime+ and Golder Rules, dated 23/04/2024. • Chersonese Estate: Refresher Training on Chemical Handling, HIRARC, E-Sime+ and Golder Rules, dated 23/04/2024. • Holyrood Estate: Chemical Management Training dated 	Complied

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		<p>22/04/2024.</p> <ul style="list-style-type: none"> Kalumpang Estate: Briefing on Chemical Handling, Spraying & PPE, dated 22/02/2024. <p>Based on interview session and documents review, training related to pesticide handling listed above were attended by sprayers, chemical mixer, store clerk and upkeep mandores.</p>	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were discovered stored in the Chemical Store on the estate, adhering to the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) along with their corresponding regulations. The storage facilities were consistently secured to avoid unauthorized access, and proper hazard signage was observed and well maintained at both exterior and interior walls. Adequate ventilation facilities and safety data sheets were also provided.</p> <p>Interview session with personnel in charge confirmed that chemical storage is restricted area for pregnant and breast-feeding mothers.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Unused chemical containers not utilized for premixing were subjected to triple rinsing and puncturing. These containers were then classified as scheduled waste and appropriately disposed of through waste collection contractors, as outlined in Indicator 7.3.2</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable since there is no aerial spraying has been executed in SOU 2 Unit of certification.</p>	Not Applicable

7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>It was confirmed that each estate has conducted their Medical Surveillance as per requirement as details below:</p> <p><u>Tali Ayer Estate</u></p> <p>Latest Medical Surveillance conducted 20-21/12/2023, Ref with Kxxx Vxxx involving 35 workers. Report of the medical surveillance was available for review and no further medical concerns was noted.</p> <p><u>Chersonese Estate</u></p> <p>Medical Surveillance conducted 18-28/07/2023, with Kxxx Vxxx with registered Occupational Health Doctor (OHD), Reg. No. IH 1xxx. 26 workers were involved among sprayers, manurers and workshop personnel. Report of the medical surveillance was available for review and no further medical concerns was noted. Latest medical surveillance recently conducted from 22-29/07/2024. However, the complete report is yet to be received.</p> <p><u>Holyrood Estate</u></p> <p>Latest Medical Surveillance conducted 24/05/2024, with Kxxx Vxxx with registered Occupational Health Doctor (OHD), Reg. No. IH 1xxx. Workers were involved among sprayers and chemical mixer. Report of the medical surveillance was available for review and no further medical concerns was noted.</p> <p><u>Kalumpang Estate</u></p> <p>Latest Medical Surveillance conducted 7-21/02/2024, with Kxxx</p>	Complied
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		Vxxx with registered Occupational Health Doctor (OHD), Reg. No. IH 1xxx. 52 workers were involved among sprayers and chemical mixer, foreman and tractor drivers. Report of the medical surveillance was available for review and all workers were found medically fit.										
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	On-site observation at P14A (Tali Ayer Estate), P022A (Chersonese Estate), P17B (Holyrood Estate) and P17B (Kalumpang Estate) in addition to verification of the employee master list, no evidence was found indicating that individuals under the age of 18, pregnant or breastfeeding women, or those with medical restrictions were involved in work related to pesticides.	Complied									
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.												
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	<div>The waste management plan available in place as per Waste Management Procedures for Upstream Malaysia; Doc. ID # SD/SDP/GSD/HSE/0522/01; Approved date: 01/05/2022 that includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics are documented in all operating units as per sample Chersonese POM Waste Management Plan as following:</div> <table><tr><th>Source</th><th>Management & monitoring/action plan</th><th>Data/records</th></tr><tr><td>Scheduled waste</td><td>EQ SW 2005 Reg. 2005 handling: - Designated storage max 180 days - Labelling - Disposal via DOE authorized contractor</td><td>- 2nd schedule - 5th schedule - 6th schedule - 7th schedule</td></tr><tr><td>Domestic waste</td><td>Segregation & landfill</td><td>- Collection 3x/weeks - 1-2ft filling trench & sandwich</td></tr></table>	Source	Management & monitoring/action plan	Data/records	Scheduled waste	EQ SW 2005 Reg. 2005 handling: - Designated storage max 180 days - Labelling - Disposal via DOE authorized contractor	- 2 nd schedule - 5 th schedule - 6 th schedule - 7 th schedule	Domestic waste	Segregation & landfill	- Collection 3x/weeks - 1-2ft filling trench & sandwich	OFI
Source	Management & monitoring/action plan	Data/records										
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		<table><tr><td></td><td></td><td>method weekly</td></tr><tr><td>Recyclable waste</td><td>Segregation & recycle – paper, aluminium can & plastic bottles</td><td>- Collection weekly - Storage & sell 6 monthly</td></tr></table> <p>Notwithstanding, implementation of waste management plan could be improved further mainly for scrap irons in Tali Ayer Estate and Chersonese Estate as well as mesocarp fibres and decanter cake in Chersonese POM.</p> <p>Hence, an OFI has been raised.</p>			method weekly	Recyclable waste	Segregation & recycle – paper, aluminium can & plastic bottles	- Collection weekly - Storage & sell 6 monthly	
		method weekly							
Recyclable waste	Segregation & recycle – paper, aluminium can & plastic bottles	- Collection weekly - Storage & sell 6 monthly							
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Proper disposal of waste material was fully understood by all personnel and demonstrated as per sample records as following: - Chersonese Estate: Fifth Schedule – Inventory of Scheduled Wastes; DOE File Ref. # A31/152/000/047; Date: 31/07/2024; Category: SW404 Clinical Waste = 0.0005 mt; SW410 Fertilizer Bag = 0.0107 - Tali Ayer Estate: Sixth Schedule – Consignment Note for Scheduled Wastes # 2024052711KUMVAS; Date: 27/05/2024; Waste code: SW404; Waste name: Clinical Waste; Quantity: 0.0030 mt; Facility: Edgenta Mediserve Sdn. Bhd. - Holyrood Estate: Domestic waste collected by Majlis Daerah Selama; Latest collection date: 5/8/2024. Majlis Daerah Selama Assessment Tax bill # 2004788; Account # T-130005931-01; Date: 02/07/2024	Complied						
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Based on site verification and interview with internal and external stakeholders, there is no use of fire in wastes disposal observed. Domestic and household wastes were landfilled.	Complied						
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.									

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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 2 continued to use and implement SOPs for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs.</p> <ul style="list-style-type: none"> - Agriculture Reference Manual (ARM) Issue No: 2 dated June 2021, - Estate Quality Management System (EQMS) Manual dated 01/11/2008, - Safety Standard Operating Procedures (SSOP) dated 25/02/2015, - Sustainable Plantation Management System Manual (SPMS), - "Guidelines On River Management" Manual, ESH Management System Manual dated 01/07/2012, - Occupational Safety and Health Manual dated 03/03/2008, - Pictorial Safety Standards and Security Guidelines (PSS). - Plantations/Mill Quality Management System (PQMS/MQMS) std operating manual <p>All the estates and mill operations were guided through the manuals and SOPs. The procedures as documented in the SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing,</p>	Complied
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		quality analysis and security. Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs, the bottom-line of which is Responsible Agricultural Charter the care for their safety and health and the environment.	
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Periodic tissue and soil sampling were carried out in the estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. The Agronomic assessment and fertiliser recommendation was conducted by SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) Research Plant Nutrition & Protection Unit PNP Northern Region to formulate the annual manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Periodic foliar sampling for Ash, N, P, K, Mg, Ca & B had been carried out in all estates as per sample as following: <ul style="list-style-type: none"> - Chersonese Estate: Plant Analysis Test Report # P142/2024; Date received: 23/01/2024; Date issued: 17/04/2024 - Chersonese Estate: Soil Analysis Test Report # S7/2024; Date received: 31/07/2023; Date issued: 15/01/2024 - Holyrood Estate: Soil Analysis Test Report # S35/2018; Date received: 24/04/2018; Date issued: 11/06/2018 for parameters depth (cm), pH, Org C (%), Total N (%), Total P+ (ppm) Avail P+ (ppm) by Sime Darby Research Sdn. Bhd. 	Complied
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	The estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled,	Complied

		<p>chipped, windowed and left to decompose. Records showed that the estates had applied EFB at 20-40 tons/ha and records showed that EFB metric tonne applied as per sample as following:</p> <ul style="list-style-type: none"> - Chersonese Estate: Kedah Zone EFB Application Fields 2024 Original Mt/Ha = 20 mt/ha. 2024 Gedong & Jin Seng div. todate total applied: 4,577 mt; area: 224 ha - Chersonese Estate: 2024 home div. todate total applied: 14,932.90 mt; area: 373.32 ha 																									
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records revealed that the actual fertilizers applied was in line with the recommended programs as following:</p> <table border="1"> <thead> <tr> <th></th><th>Fertilizer</th><th>Kg/palm</th><th>Application month</th></tr> </thead> <tbody> <tr> <td>1</td><td>Borate</td><td>0.10</td><td>May/Nov</td></tr> <tr> <td>2</td><td>NK C1/C2</td><td>3.00-4.00</td><td>Sept/Feb</td></tr> <tr> <td>3</td><td>R Phosphate</td><td>1.75 - 2.00</td><td>April /May</td></tr> <tr> <td>4</td><td>GML</td><td>2.50</td><td>April</td></tr> <tr> <td>5</td><td>Kieserite</td><td>1.50</td><td>April</td></tr> </tbody> </table> <p>These records were maintained in the report of Northern Region 1st Half Fertilizer Application Actual vs Programme (Mature OP) Year 2023.</p>		Fertilizer	Kg/palm	Application month	1	Borate	0.10	May/Nov	2	NK C1/C2	3.00-4.00	Sept/Feb	3	R Phosphate	1.75 - 2.00	April /May	4	GML	2.50	April	5	Kieserite	1.50	April	Complied
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5	Kieserite	1.50	April																								
Criterion 7.5: Practices minimise and control erosion and degradation of soils.																											
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain,	Maps identifying marginal and fragile soils, including steep terrain	Complied																								

	are available. - Critical (Major) compliance -	available in all estates as per soil maps and soil topography maps with identified type of soil series and its area percentage as per sample as following: - Chersonese Estate – Main Div.: Biah (60.42%), Jawa (1.76%), Perepat (15.71%), Sabrang (2.72%), Serkat (1.61%), Parit Botak (3.71%) & Sedu (14.08%) - Chersonese Estate – Jin Seng Div.: Biah (34.90%), Carey (2.65%), Selangor (6.62%), Jawa (16.75%), Guar (1.41%) & Sedu (37.67%) - Holyrood Estate – Main Div.: C3. Holyrood (16.61%), C3. Rasau (42.06%), C3. Telemong (14.33%), C4. Sg. Buloh (11.16%) & C4. Unclassified (15.82%) - Holyrood Estate - Bukit Rhona Div.: C1. Munchong (59.85%) & C4. Unclassified (40.15%) There were no marginal and fragile soils identified in the assessed estate. During field visit at the estates, it was sighted there was no oil palm planting on steep terrains as well.	
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established Group Sustainability and Quality Policy Statement, dated 02/12/2019 and Reclassification Of Conservation Set Aside (CSA) For Upstream Operations dated 31/05/2019 Ref: GSQM/PLS/CSA-GD01 clause 3.1.2 which stated "No replanting is allowed of any individual, contagious area of steep slopes (Greater than 25 degree) larger than 2 ha within the unit of certification. Site visit confirmed no replanting done on such area.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting conducted at all estates within SOU 2.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and			

operations.			
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	No new planting conducted at all estates within SOU 2. As per previous assessment, in order to ensure the long-term suitability of land for palm oil cultivation, soil maps or soil surveys were diligently considered in the formulation of plans and execution of operations. These assessments specifically accounted for marginal and fragile soils (indicator 7.5.1) and steep planting (7.5.2), incorporating their characteristics and limitations into the decision-making process for future replanting. By incorporating this valuable information, the management aims to optimize land utilization and promote sustainable practices within the palm oil industry. All estate has established the soil maps together with the topography of the area is well recognised.	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>No new planting conducted at all estates within SOU 2. As addressed in the Group Sustainability and Quality Policy Statement endorsed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest:</p> <p>"We will seek to protect and enhance forest and wildlife and minimise carbon emission from land use change through: vii. No new development of peat areas, regardless of depth or location. We will seek to rehabilitate existing plantings on peats where possible."</p> <p>Site visit made to the replanting area confirmed that planting on marginal and fragile soils are avoided.</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>	No new planting conducted at all estates within SOU 2. Planning of drainage and irrigation systems, roads and other infrastructure were guided by soil surveys and topographic information as per documented maps identifying marginal and fragile soils, including steep terrain available in all estates as per soil maps and soil	Complied

		<p>topography maps with identified type of soil series and its area percentage as per sample as following:</p> <ul style="list-style-type: none"> - Chersonese Estate – Main Div.: Biah (60.42%), Jawa (1.76%), Perepat (15.71%), Sabrang (2.72%), Serkat (1.61%), Parit Botak (3.71%) & Sedu (14.08%) - Chersonese Estate – Jin Seng Div.: Biah (34.90%), Carey (2.65%), Selangor (6.62%), Jawa (16.75%), Guar (1.41%) & Sedu (37.67%) - Holyrood Estate – Main Div.: C3. Holyrood (16.61%), C3. Rasau (42.06%), C3. Telemong (14.33%), C4. Sg. Buloh (11.16%) & C4. Unclassified (15.82%) - Holyrood Estate - Bukit Rhona Div.: C1. Munchong (59.85%) & C4. Unclassified (40.15%) <p>There were no marginal and fragile soils identified in the assessed estate. During field visit at the estates, it was sighted there was no oil palm planting on steep terrains as well.</p>	
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	No new planting conducted at all estates within SOU 2. There is no peat soil identified at estate visited in SOU 2. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, this is not applicable.	Not Applicable
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p>	No new planting conducted at all estates within SOU 2. There is no peat soil identified at estate visited in SOU 2. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, this is not applicable.	Not Applicable

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	- Minor compliance -		
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	No new planting conducted at all estates within SOU 2. There is no peat soil identified at estate visited in SOU 2. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, this is not applicable.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	No new planting conducted at all estates within SOU 2. There is no peat soil identified at estate visited in SOU 2. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, this is not applicable.	Not Applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -	No new planting conducted at all estates within SOU 2. There is no peat soil identified at estate visited in SOU 2. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, this is not applicable.	Not Applicable
7.7.6	(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.	No new planting conducted at all estates within SOU 2. There is no peat soil identified at estate visited in SOU 2. Verification through site visit, document checking, and interview confirmed that there	Not Applicable

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	- Critical (Major) compliance -	is no new planting activity in the estate visited. Hence, this is not applicable.	
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No new planting conducted at all estates within SOU 2. There is no peat soil identified at estate visited in SOU 2. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, this is not applicable.	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>SOU 2 established their Water Management Plan 2024 to maintain the quality and availability of natural water resources that include the following:</p> <ul style="list-style-type: none"> - Analysis/test treated water twice per year for compliance with the Ministry of Health Specification for Drinking Water Quality to ensure adequate and safe used of water to workers with no restrictions - Minimize wastage of treated water through maintenance of pipelines and monitoring of water consumption by employees - Analyses/test source (raw) water supplying mill water treatment system per DOE 2006 Interim National Quality Water Standard - Avoid pollution of raw water resources by implementing the pollution prevention plans and monitor the river water quality through water analysis - Treat mill effluent to required levels and regularly monitor its water discharge quality to comply with EQ (Prescribed Premises) (Crude Palm Oil) Regulations 1977 and written 	Complied

		approval issued by DOE so as not to pollute water use by communities downstream of discharge point																										
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 2 maintained their riparian zones well based on the observation during site visits with efforts to maintained and enhanced the area were demonstrable. Among the efforts observed were demarcation of riparian zones, restriction of herbicides or fertilizer application in the zones, enrichment of vegetation and installation of signboards.</p> <p>To ensure natural stream water not affected by the mill and estate activities, regular water quality monitoring conducted as per sample documented as following:</p> <ul style="list-style-type: none">- Tali Ayer Estate: Water Analysis Test Report # IE538/2024; Date: 24/04/2024; Water Samples sources: Sg. Semang – Tali Ayer Main Div. & Sg. Samagagah, Sg. Krian Div. & Sg. Bogak; Ref. # E010/WS/JUNE/2024- Chersonese Estate: Water Analysis Test Report # IE1060/2024; Date: 19/07/2024; Sapmple Ref. CP 1 – Field # 95B, CP 2 – Field # 2014A & CP 2 – Field # 2017C; Parameter tested: pH, BOD, COD, SS, AN, DO & P	Complied																									
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Chersonese POM disposed its POME final discharge via water course with discharged parameters in compliance of DOE license limit as following:</p> <table><tr><th>Parameters</th><th>Limit</th><th>May 2024</th><th>June 2024</th><th>July 2024</th></tr><tr><td>pH</td><td>5-9</td><td>9.25</td><td>9.17</td><td>8.65</td></tr><tr><td>BOD mg/l</td><td>100</td><td>57</td><td>45</td><td>32</td></tr><tr><td>A Nitrogen</td><td>150</td><td>10</td><td>8</td><td>7</td></tr><tr><td>Total N</td><td>200</td><td>52</td><td>76</td><td>61</td></tr></table>	Parameters	Limit	May 2024	June 2024	July 2024	pH	5-9	9.25	9.17	8.65	BOD mg/l	100	57	45	32	A Nitrogen	150	10	8	7	Total N	200	52	76	61	Complied
Parameters	Limit	May 2024	June 2024	July 2024																								
pH	5-9	9.25	9.17	8.65																								
BOD mg/l	100	57	45	32																								
A Nitrogen	150	10	8	7																								
Total N	200	52	76	61																								

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		<table><tr><td>Oil & Grease</td><td>50</td><td>7</td><td>3</td><td>6</td></tr><tr><td>Total Solids</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>S Solids</td><td>400</td><td>330</td><td>160</td><td>70</td></tr></table> <p>Results indicated all parameters tested complied with regulatory standards.</p>	Oil & Grease	50	7	3	6	Total Solids	-	-	-	-	S Solids	400	330	160	70	
Oil & Grease	50	7	3	6														
Total Solids	-	-	-	-														
S Solids	400	330	160	70														
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Chersonese POM water use monitored and recorded as following: - 2023: 1.39 m³/mt FFB - Jan – Jul 2024 (to date): 1.58 m³/mt FFB	Complied															
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																		
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	The plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored, and documented as per records of Chersonese POM Monitoring of energy use as following: - 2023: 3.25 liters/mt FFB - 2024 (to-date): 3.18 liters/mt FFB	Complied															
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.																		
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	SOU 2 Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation, fuel consumption, POME treatment and chemicals consumptions. The management from both estates and mill had planned to reduce emission by daily inspection and monitoring which calculated and reported in the Palm GHG Summary Report. Notwithstanding, the main GHG emission by mill via POME treatment i.e. biogas containing methane was captured and	Complied															

		gainfully utilized for renewable energy generation via biogas engine.	
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	SOU 2 calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. There is no new development within the SOU 2 estates.	Complied
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	Other significant pollutants identified mainly sourced from the boiler stack emissions as per sample monitoring by Chersonese POM as following: - Report on Isokinetic Monitoring of Boiler Stack Flue Gas (MS 1596:2003) Ref. # L-PG-AC2406CSD-0573; Monitoring date: 14/06/2024; Reporting date: 24/06/2024 by Environmental Science (M) Sdn. Bhd. - ES Laboratories (M) Sdn. Bhd. Certificate of Analysis Reg. # L-PG-AC2406CSD-0573; Sampling Date: 14/06/2024; Report Date: 24/06/2024; Dust concentration: 29.5 mg/m3 @ 7.9 % CO2 (Limit 150 mg/m3); CO: 275 mg/m3 (Limit 1000 mg/m3)	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	There was no land preparation of existence or new planting in SOU 04 and Estates by burning ever since SDB practiced zero burning as per the policy as following: - EQMS-SOP-Section B2 - Under felling/clearing & land preparation - Carbon Policy As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms	Complied

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		were felled, shredded, windrow-ed and left to decompose. Site visit confirmed that there is no evidence that fire had been used to prepare land for replanting in the estate no fire was used for waste disposal.	
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 and control established as per documented policies and guidelines as well as online Hotspot Dashboard via company's website link as following: https://www.sdguthrie.com/who-we-are/sd-guthrie-worldwide/hotspot-dashboard/ The Dashboard tracks and reports any hotspot occur within company's concession areas. SD Guthrie implemented zero burning policy since 1985 and strictly adhere to it.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	SOU 2 engages with adjacent stakeholders on fire prevention and control measures during consultation session latest conducted on 05/07/2024. This was confirmed by the sample external stakeholders among adjacent local community during on-site interview.	Complied
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	No land clearing since November 2005 conducted in all estates within SOU 2. Hence, this is not applicable.	Not Applicable
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows:	No land clearing since November 2005 conducted in all estates within SOU 2. Based on the records of HCV Re-Assessment Final	Complied

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	<p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>	<p>Report; Version 2.0; September 2016 for Strategic Operating Unit (SOU) 2 Chersonese, it was reported that a total of 83.39 ha HCV area identified within SOU 2. The report specified that the latest HCV assessment was conducted by personnel from PSQM Department of Sime Darby Plantation Sdn. Bhd. which complements the info from Biodiversity Baseline Assessment Report dated back in February 2009.</p> <p>The assessment team has proposed recommendations that incorporated basic conservation planning principles for consideration into management administration to manage the HCV and conservation areas. The proposed management and monitoring for HCV possible threats in SOU 2 were then adopted by the respective estates.</p>																															
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable.	Not Applicable																														
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -</p>	<p>No changes of information related to HCV since previous assessment where the assessment concluded the identified HCV within SOU 2 as following:</p> <table border="1"> <thead> <tr> <th>Estate</th><th>Presence</th><th>Area (ha)</th><th>HCV</th></tr> </thead> <tbody> <tr> <td rowspan="4">Chersonese</td><td>Bund (Kurau River)</td><td>10.82</td><td>4</td></tr> <tr> <td>Bund (Teluk Rubiah Mangrove Forest)</td><td>6.77</td><td>4</td></tr> <tr> <td>Bund (Kurau River – Jin Seng Div.)</td><td>2.99</td><td>4</td></tr> <tr> <td>Mill water catchment</td><td>5.29</td><td>4</td></tr> <tr> <td rowspan="4">Kalumpang</td><td>Bund (Kurau River & Cabai Malai Mangrove reserve)</td><td>9.82</td><td>4</td></tr> <tr> <td>River reserve (Kurau River)</td><td>10.72</td><td>4</td></tr> <tr> <td>Pond</td><td>0.13</td><td>4</td></tr> <tr> <td>Sri Thirupathaiamman Temple</td><td>0.42</td><td>6</td></tr> </tbody> </table>	Estate	Presence	Area (ha)	HCV	Chersonese	Bund (Kurau River)	10.82	4	Bund (Teluk Rubiah Mangrove Forest)	6.77	4	Bund (Kurau River – Jin Seng Div.)	2.99	4	Mill water catchment	5.29	4	Kalumpang	Bund (Kurau River & Cabai Malai Mangrove reserve)	9.82	4	River reserve (Kurau River)	10.72	4	Pond	0.13	4	Sri Thirupathaiamman Temple	0.42	6	Complied
Estate	Presence	Area (ha)	HCV																														
Chersonese	Bund (Kurau River)	10.82	4																														
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	River reserve (Kurau River)	10.72	4																														
	Pond	0.13	4																														
	Sri Thirupathaiamman Temple	0.42	6																														

		Tali Ayer	Bund (Samagagah river)	3.88	4		
			River reserve (Semang river)	5.50	4		
			Bund (Kerian river)	0.21	4		
			Monkey Island	14.65	4		
		Holyrood	River reserve (Segar river)	12.19	4		
		The assessor recommended that the HCV management & monitoring of HCV as following:					
HCV Area		Possible threats	Management & monitoring				
Coastline/fringe mangrove/bund		<ul style="list-style-type: none">- Soil erosion- Eroded soil deposited down persistently cans cause loss of land	<ul style="list-style-type: none">- Education and awareness for workers- Marking of HCVA on the map and in the field- Monitoring by photo (with date) of shoreline- Monitoring of water table and salinity- Soil/ground cover measurement- Waterway sedimentation and siltation measurements				
River reserve/ water bodies		<ul style="list-style-type: none">- Riverbanks erosion- Sedimentation- Eutrophication of aquatic environments and vegetation overgrowth due to fertilizer applications- Interruption on aquatic biological health	<ul style="list-style-type: none">- Education and awareness for workers- Monitoring of water sampling results (where applicable)- Ensure no agrochemical activities area carried out at bordering the water bodies- Cover any bare soil with				

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			<ul style="list-style-type: none"> - Degradation of catchment areas 	<ul style="list-style-type: none"> planting of vetivar grasses, groundcovers, etc. to reduce soil erosion - Monitoring by photo (with date) of riverbanks 	
		Forest border	<ul style="list-style-type: none"> - Forest encroachment - Illegal poaching/ wildlife hunting - Illegal logging - Forest product exploitation - Human-wildlife conflict 	<ul style="list-style-type: none"> - Erect signboards to create awareness such as "No trespassing", "No hunting", "No open burning" etc. - Maintain the boundary stone along borders - Liaison with forestry & wildlife department on ways to handle any human-wildlife conflicts - Educate internal and external stakeholders to discourage illegal poaching/logging - Notify the relevant authorities immediately if any fires and/or illegal activities are sighted 	
		Religious/sacred rea	<ul style="list-style-type: none"> - Demolition - Vandalism 	<ul style="list-style-type: none"> - Ensure area is secured and housekeep - Enabling a consistent, two-way engagement with locals (mutual agreement and continuous consultation - Monitoring by photo (with date) of respective areas 	

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		Verified sample records in all estates confirmed that monitoring was consistently implemented on periodical basis.	
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	No local communities have been identified in HCV areas and HCV forest within SOU 2 certification unit. Furthermore, there is no land clearing after November 2005. Thus, this indicator is not applicable.	Not Applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	Based on the HCV assessment report mentioned in Indicator 7.12.2, there was a potential RTE species presence in the plantation area although no sightings reported since last audit. As part of the conservation programs, signage about the restriction to capture RTE and the information about disciplinary measures were planted at many strategic places in the estate to educate the employees. A programme to regularly educate the workforce about the status of RTE species is in place and carried out regularly during daily morning muster as per sample as following: - Kalumpong; Date: 01/07/2024 - Tali Ayer; Date: 01/07/2024 - Holyrood; Date: 24/06/2024 - Chersonese; Date: 22/05/2024	Complied
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 -	Outcomes of monitoring (HCV monitoring & RTE sighting checklist) are monitored on monthly basis. Reports of monitoring were made available for verification. The monitoring is one of the activities included in the HCV management and monitoring plan of the estate as per Management and Monitoring Plan for HCV areas	Complied

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		within SOU 2 estates. Among the main actions are to develop HCV Management Plan to maintain and enhance identified HCV. These monitoring findings have been further fed back into the management plan that leads to frequent awareness briefings and training programs of stakeholders mainly among workers to conserve nature and RTE by not hunting or keeping the RTE as pet.	
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	There was no land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within SOU 2 certification unit. Thus, this indicator is not applicable.	Not Applicable

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **Strategic Operating Unit (SOU 2) - Chersonese 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:

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

The summary of the Net GHG emitted in **2023** for **Strategic Operating Unit (SOU 2) - Chersonese Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.63
PKO	0.63

Extraction	%
OER	19.91
KER	5.21

Production	t/yr
FFB Process	165,277.56
CPO Produced	32,913.7
PKO Produced	8,611.73

Land Use	Ha
OP Planted Area	27,416.01
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	27,416.01

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	91,911.19	0.61	3,038.51	0.82	-	-	94,949.70	0.62
CO ₂ Emission from fertilizer	11,001.39	0.07	335.37	0.09	-	-	11,336.76	0.07
NO ₂ Emission	5,896.66	0.04	163.70	0.04	-	-	6,060.36	0.04
Fuel Consumption	91.84	-	1.42	-	-	-	93.26	-
Peat Oxidation	-	-	-	-	-	-	-	-
Sink								
Crop Sequestration	- 85,730.10	-0.57	- 2,831.82	-0.77	-	-	- 88,561.92	-0.58
Conservation Sequestration	-	-	-	-	-	-	-	-
Total	23,170.97	0.15	707.19	0.19	-	-	26,005.83	0.15

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	-	-
Fuel Consumption	6.12	-
Grid Electricity Utilization	-	-
Credit		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
Total	6.12	-

Summary of Kernel Crusher Emission and Credit (if applicable)

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

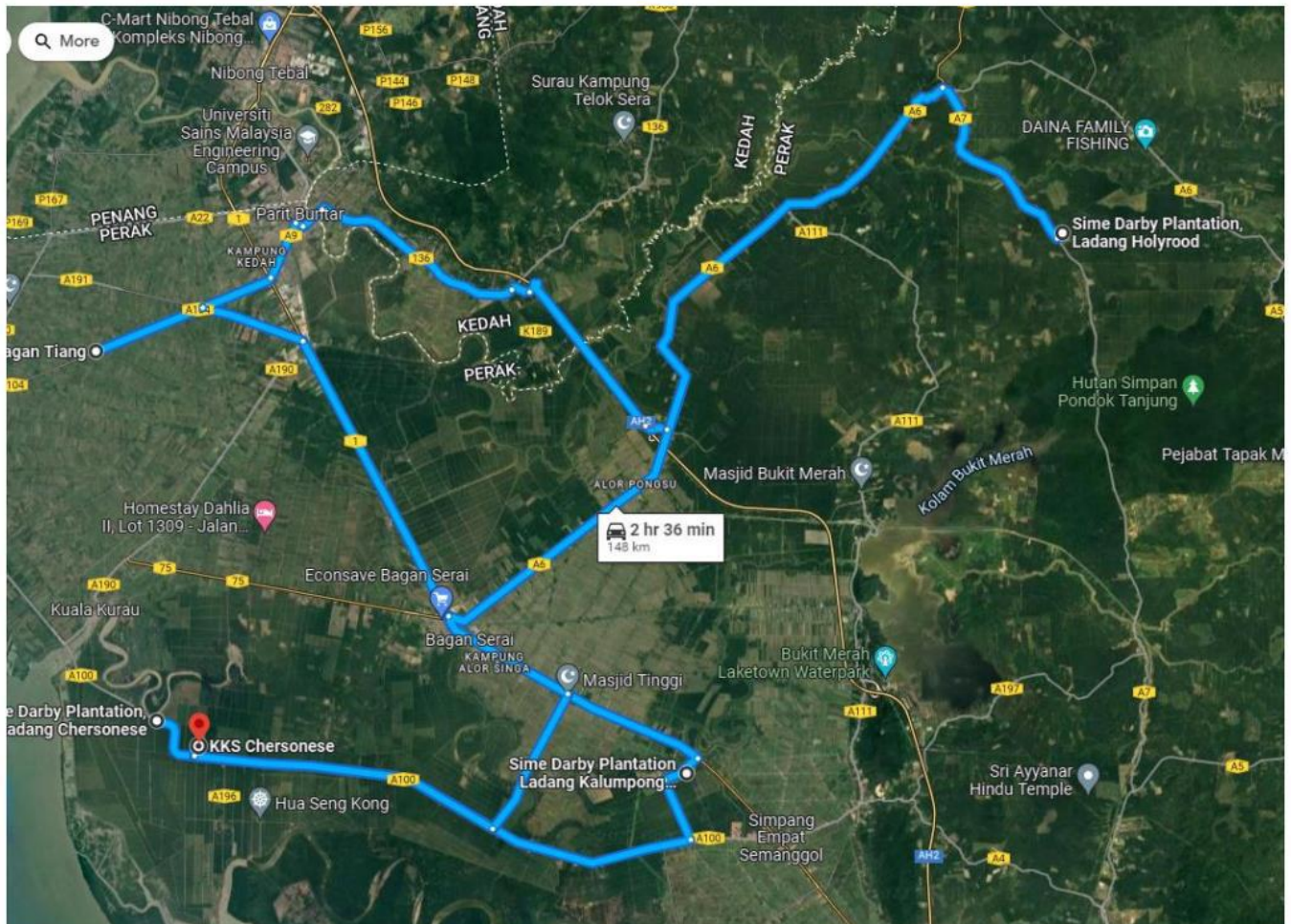
*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	4.02
Divert to methane captured (energy generation) (%)	95.98

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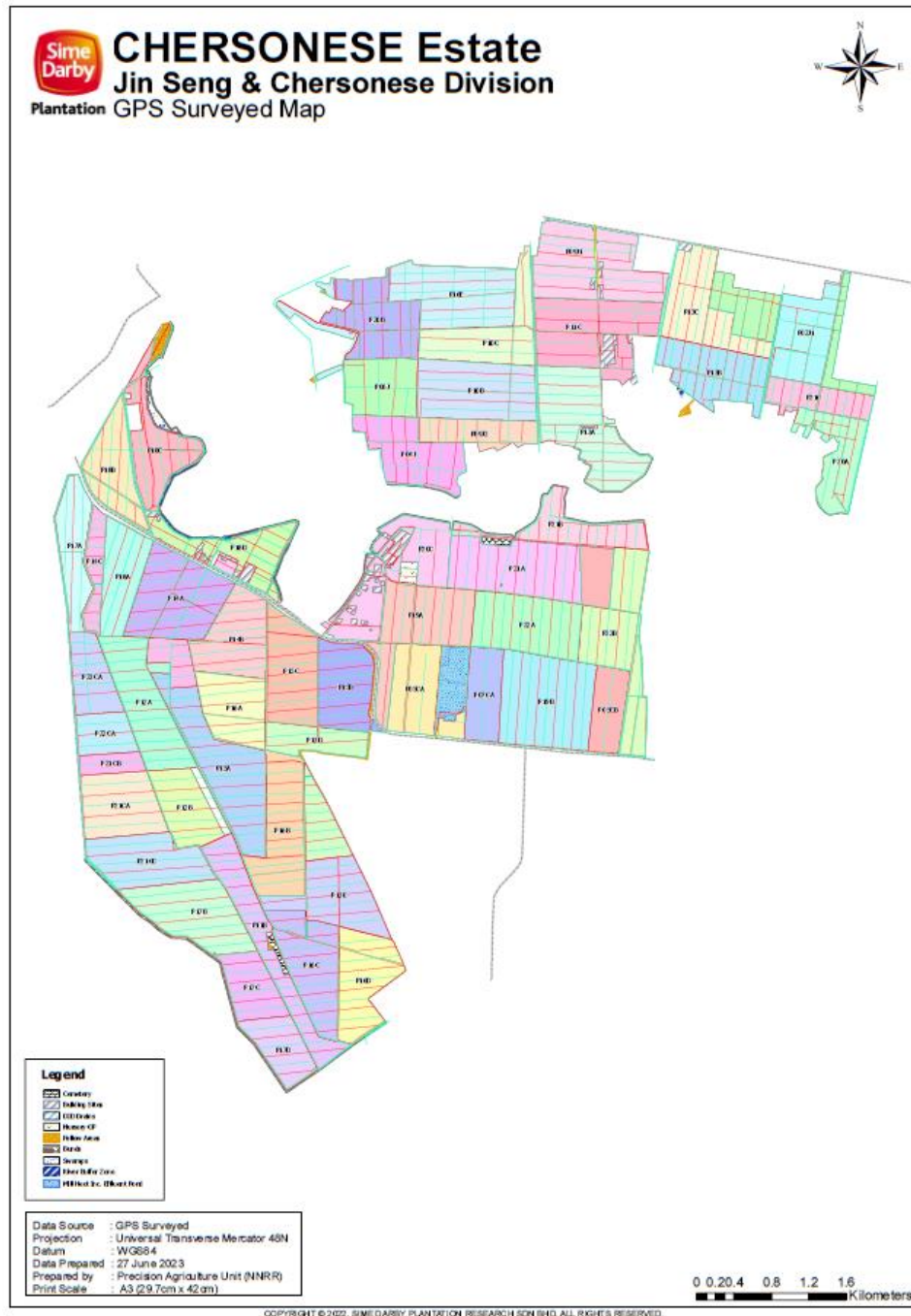
Appendix C: Location Map of Certification Unit and Supply bases

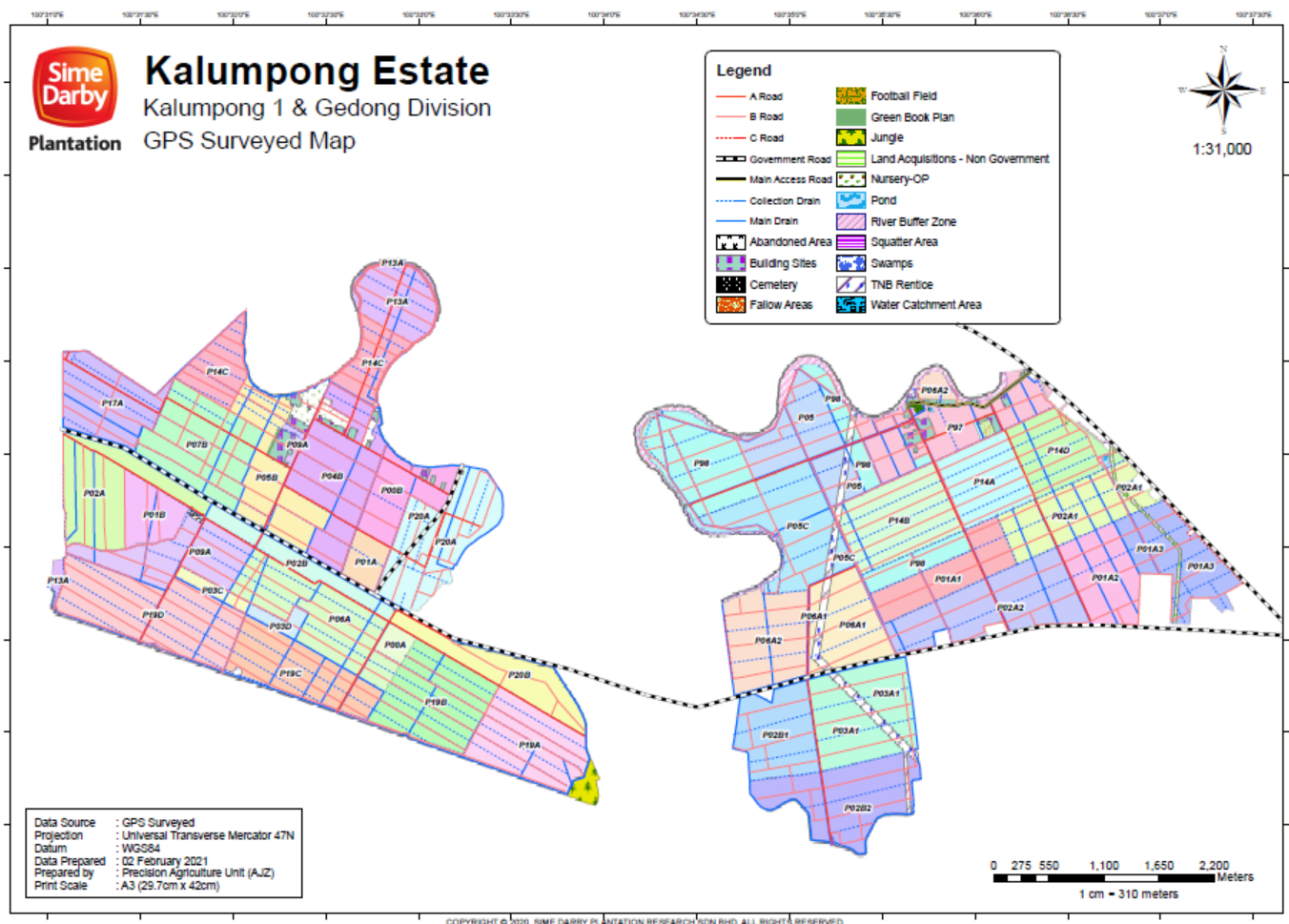


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Appendix D: Estate Field Map

Chersonese Estate

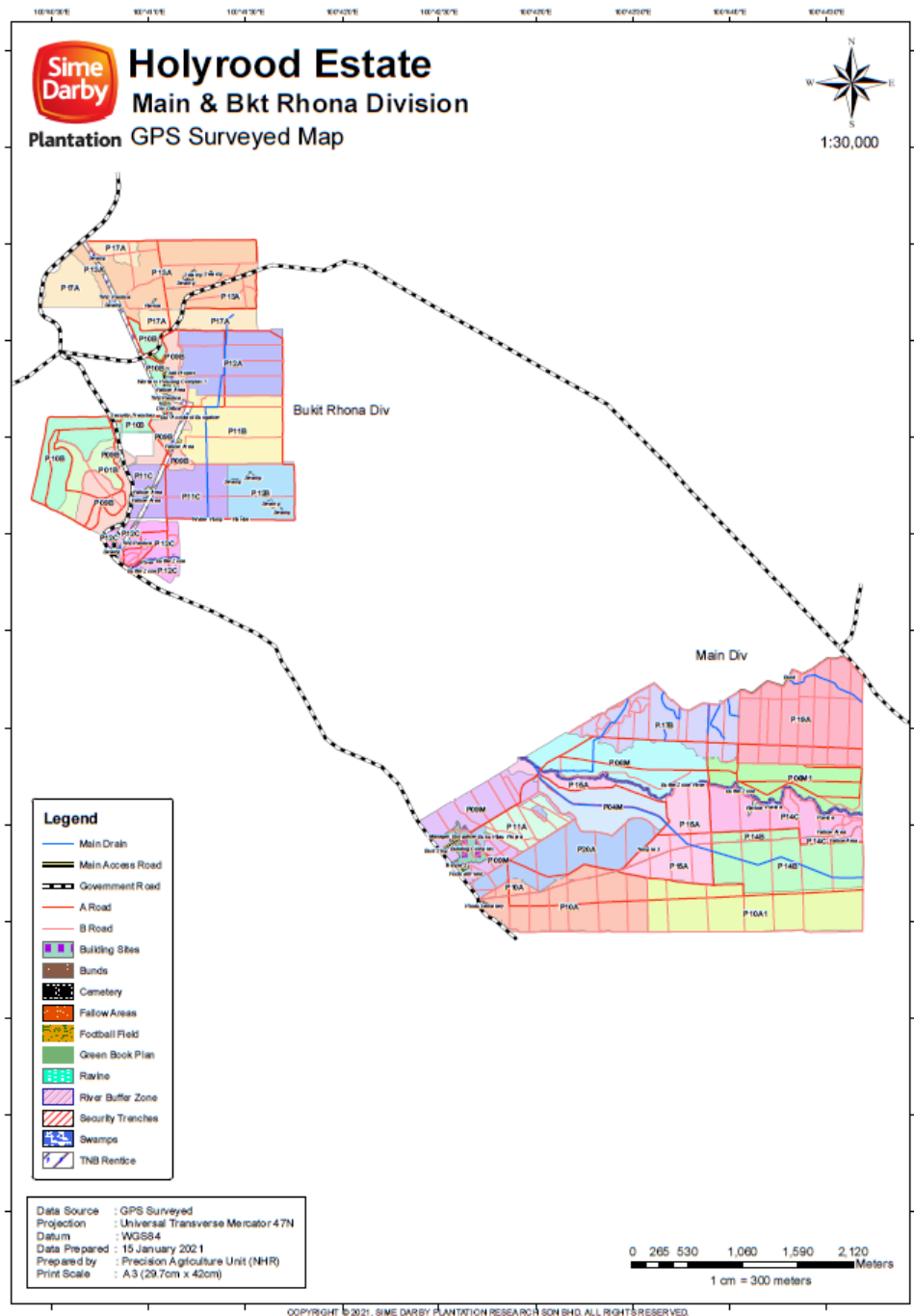


Kalumpung Estate

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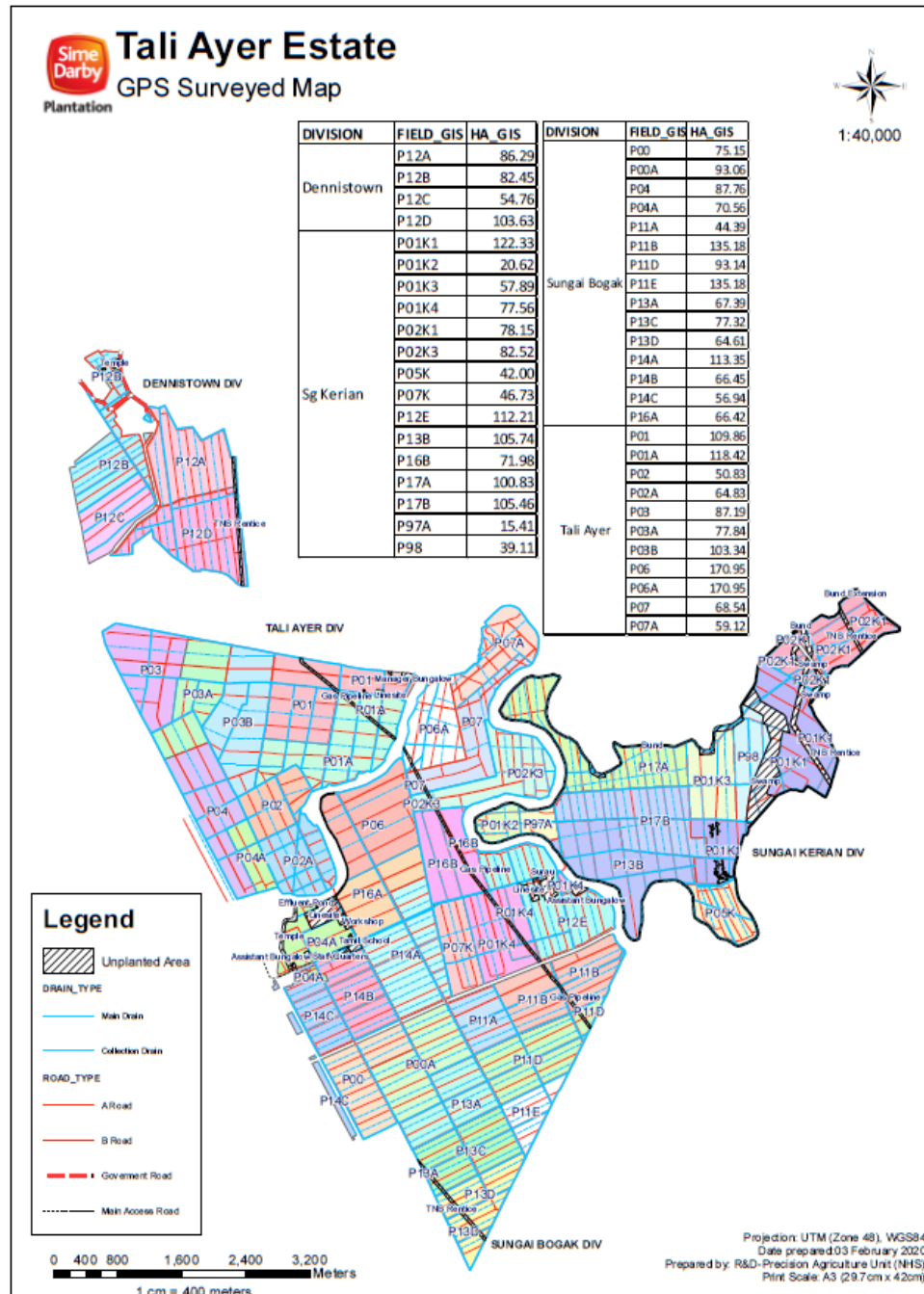
Holyrood Estate



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Tali Ayer Estate



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Appendix E: List of Smallholder Registered and/or sampled

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

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

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Appendix F: List of Abbreviations

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