PF441 RSPO P&C Public Summary Report Revision 15 (Nov 2023)

### 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: Sime Darby Plantation Berhad

Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower No, 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia

> Certification Unit: Strategic Operating Unit (SOU 24) – Hadapan Palm Oil Mill

Location of Certification Unit: Batu 6, Jln Bkt Permai, Bukit Permai, Layang-Layang, 81850, Johor, Malaysia

> Date of Final Report: 05/04/2024

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### Section 1: Scope of the Assessment

1. Company Details					
Parent Company	Sime Darby Plantation Berh	Sime Darby Plantation Berhad			
RSPO Membership Number	1-0008-04-000-00 Membership Approval Date 07/09/2004			07/09/2004	
Address	Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia				
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 24) — Hadapan Palm Oil Mill				
Location / Address	Batu 6, Jln Bkt Permai, Buk	it Permai, La	yang-Layang, 81850, 1	Johor, Malaysia	
Website	http://www.simedarbyplant	ation.com/			
Management Representative	Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD)	E-mail	<u>shylaja.vasudevan@s</u> i	medarbyplantation.com	
Telephone	+60 3-7848 4000	Facsimile	+60 3-7848 4363		

2. Certification Inform	nation			
Certificate Number	RSPO 739013	Certificate Start Date	29/03/2021	
Date of First Certification	29/03/2011	Certificate Expiry Date	28/03/2026	
Scope of Certification	Production of Sustainable Crude	e Palm Oil (CPO) and Palm Kerr	nel (PK)	
Visit Objectives	<ul> <li>Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>			
Assessment Cycle	<ul> <li>Pre Assessment (Choose an item.)</li> <li>Initial Assessment</li> <li>Annual Surveillance Assessment (ASA 2_3)</li> <li>Recertification Assessment (Choose an item.)</li> <li>Scope Extension</li> </ul>			
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 ⊠ Malaysia National Interpretation 2019 of the RSPO P&C 2018			
Supply Chain Module	□ Identity Preserved; ⊠ Mass Balance Mill Capacity 60 mt/hr			
ISH certification Phase	🗆 Eligibility 🗆 Milestone A 🗆 Milestone B 🖂 Not Applicable			
Is this a remote audit or on-site audit	$\square$ On-site audit (Option AI) $\square$ On-site audit (Option AII) $\square$ Remote audit (Option B)			

3. Other Certifications						
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date			
MSPO 739514	MSPO Part 3 (MS 2530-3:2013) General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn. Bhd.	14/02/2028			
MSPO 739513	MSPO Part 4 (MS 2530-4:2013) General Principles for Palm Oil Mills	BSI Services Malaysia Sdn. Bhd.	14/02/2028			
MSPO 739515	MSPO Supply Chain Certification (MSPO-SCCS-01, 01-Sept-2018)	BSI Services Malaysia Sdn. Bhd.	23/03/2025			
EU-ISCC-Cert- DE107-70059323	International Sustainability and Carbon Certification	AgroVET Certification	26/04/2024			

4. Location(s) of Mill & Supply Bases					
Name		GPS Coo	ordinates		
(Mill / Supply Base / Group Manager / Smallholders)	Location	Latitude	Longitude		
Hadapan Palm Oil Mill	Batu 6, Jalan Bukit Permai, Bukit Permai, 81850 Layang-Layang, Johor, Malaysia	1° 45′ 44.00″ N	103° 26′ 51.00″ E		
Kulai Estate	Batu 25, Jalan JB Air Hitam, 81000 Kulai, Johor, Malaysia	1° 40′ 05.14″ N	103° 32′ 28.21″ E		
Layang Estate	Jalan Ladang Layang, 81850 Layang- Layang, Johor, Malaysia	1° 46′ 00.27″ N	103° 27′ 14.07″ E		
Seri Pulai Estate	Ladang Seri Pulai, 81000 Kulai, Johor, Malaysia	1° 35′ 36.10″ N	103° 30′ 34.30″ E		
CEP Rengam Estate	Ladang CEP Rengam, 86300 Rengam, Johor, Malaysia	1° 52′ 23.01″ N	103° 22′ 45.73″ E		

5. Description of Supply Base							
New Planting	🛛 No (no change	oxtimes No (no change in total planted area)			□ Yes (please refer to Principle 7 for deta		
Development						_	
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastruct & Other (ha)		Total Area (ha)	% of Planted	
Kulai Estate	2,652.37	0.77	409.85		3,062.99	86.59	
Layang Estate	2,819.72	6.02	268.84		3,094.58	91.12	
Seri Pulai Estate	1,980.76	27.61	91.46		2,099.83	94.33	
CEP Rengam Estate	2,869.32	7.19	162.87		3,039.38	94.40	
Total	10,322.17	41.59	933.02	2	11,296.78	91.37	

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#### Note(s):

- (1) The latest updated data taken from SEMUA Field Master listing in SAP System.
- (2) Based on the latest land survey conducted by the Precision Agriculture Unit of Sime Darby Plantation in 2023, there have been changes to the hectarage statement. Specifically, there has been a reduction of 178.81 hectares in the hectarage for Infrastructure & Other, and a reduction of 124.81 hectares in the Total Area compared to the hectarage statement stated in the previous audit summary report.

6. Plantings & Cycle							
Estate /		Ag	je (Years) -	ha			Turrenterer
Smallholders	0 - 3	4 - 8	9 - 18	19 - 25	>25	Mature	Immature
Kulai Estate	73.18	613.83	1,552.34	128.65	284.37	2,579.19	73.18
Layang Estate	185.10	393.19	1,481.50	759.93	0.00	2,634.62	185.10
Seri Pulai Estate	254.29	559.68	474.24	692.58	0.00	1,726.47	254.29
CEP Rengam Estate	450.79	991.18	578.70	497.40	351.25	2,418.53	450.79
Total (ha)	963.36	2,557.88	4,086.78	2,078.56	635.62	9,358.81	963.36

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

immature area to mature area.

		Tonnage (	MT) / Year	
Estate / Smallholders	Estimated Last Year (Mar 2023 – Feb	Actual (Dec 2022 – Nov 2023)		Forecast (Mar 2024 – Feb
	2024)	Previous License Period (Dec 22 – Feb 23)	Current License Period (Mar 23 – Nov 23)	2025)
Kulai Estate	25,744.55	6,886.87	28,571.04	45,168.99
Layang Estate	53,112.87	7,938.26	31,096.30	58,886.47
Seri Pulai Estate	31,672.17	5,271.47	21,464.54	38,652.15
CEP Renggam Estate	35,000.00	6,479.31	25,628.04	47,942.23
Total	145,529.59	26,575.91	106,759.92	190,649.83
		133,3		

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8. Summary of Certified Tonnage of FFB (From Other Certified Unit(S))					
		Tonnage (MT) / Year			
Estate / Smallholders	Estimated Last Year (Mar 2023 – Feb			Forecast (Mar 2024 – Feb	
	<b>2024)</b>	Previous License Period (Dec 22 – Feb 23)	Current License Period (Mar 23 – Nov 23)	2025)	
Bukit Badak Estate		252.77	2,094.62		
Pekan Estate		276.01	5,703.67		
Sembrong Estate		171.50	1,352.22		
Tun Dr. Ismail Estate		332.37	6,248.68		
Ulu Remis Estate		190.26	1,493.75		
Bukit Benut Estate		0.00	814.97		
Cenas Estate		0.00	61.63		
Lambak Elaeis Estate		0.00	1,998.02		
Total		1,222.91	19,767.56		
	20,990.47				

#### Note(s):

 Ulu Remis Estate, Tun Dr Ismail Estate, Bukit Badak Estate, Cenas Estate, Sembrong Estate, and Pekan Estate are RSPOcertified estates under Ulu Remis Palm Oil Mill's Unit of Certification (UoC) with RSPO Certificate No CU-RSPO-863077 (valid until 10/04/2026).

(2) Bukit Benut and Lambak Elaeis Estate are RSPO-certified estates under Strategic Operating Unit (SOU 22) – Bukit Benut Palm Oil Mill's Unit of Certification (UoC) with RSPO Certificate No RSPO 591229 (valid until 04/10/2026).

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)					
		Tonnage (	MT) / Year		
Outgrowers / Smallholders	Estimated Last Year (Mar 2023 –		Actual (Dec 2022 – Nov 2023)		
	Feb 2024)	Previous License Period (Dec 22 - Feb 23)	Current License Period (Mar 23 – Nov 23)	Feb 2025)	
Bingan Jaya Sdn Bhd		0.00	6,687.95		
Genting Kulai Besar		0.00	179.62		
Genting Sg Rayat		0.00	109.90		
Genting Sri Gading		0.00	146.47		
Hong Hui Trading		0.00	30.49		
Kelapa Sawit Tai Hwa		0.00	632.61		
Pekan Sawit	_	0.00	50.59		
VR Plantation (M) S/B		0.00	12,198.20		
Total		0.00	20,035.83		
		20,03	35.83		

9A.	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	December 2022	10,645.95	1,634.83	12,280.78			
2	January 2023	8,593.44	1,777.95	10,371.39			
3	February 2023	8,474.86	1,456.16	9,931.02			
4	March 2023	7,810.28	2,742.40	10,552.68			
5	April 2023	6,655.56	1,057.81	7,713.37			
6	May 2023	1,645.34	483.62	2,128.96			
7	June 2023	17,298.60	2,415.53	19,714.13			
8	July 2023	14,968.71	890.75	15,859.46			
9	August 2023	17,055.49	2,732.19	19,787.68			
10	September 2023	21,987.99	1,470.85	23,458.84			
11	October 2023	18,254.41	1,271.60	19,526.01			
12	November 2023	20,935.67	2,102.14	23,037.81			
	TOTAL	154,326.30	20,035.83	174,362.13			

10. Summary of Certified Tonnage (MT) (Not Applicable for ISS)				
Estimated Last Year (Mar 2023 – Feb 2024)	Act (Dec 2022 -	Forecast (Mar 2024 – Feb 2025)		
	Previous License Period (Dec 22 – Feb 23)	Current License Period (Mar 23 – Nov 23)		
FFB	F	FB	FFB	
372,881.30 mt	27,798.82 mt	126,527.48 mt	190,649.83 mt	
	154,32	6.30 mt		
CPO (OER: 19.70%)	CPO (OER: 21.86%)	CPO (OER: 22.10%)	CPO (OER: 20.00%)	
73,567.88 mt	6,077.62 mt	27,957.91 mt	38,129.97 mt	
	CPO (OER	: 22.05%)		
	34,035	5.53 mt		
PK (KER: 5.02%)	PK (KER: 5.83%)	PK (KER: 5.43%)	PK (KER: 5.00%)	
18,486.89 mt	1,619.53 mt	6,870.65 mt	9,532.49 mt	
PK (KER: 5.50%)		: 5.50%)		
	8,490			

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#### Note(s):

- (1) Due to increased production for CSPO, CSPK, and FFB, resulting from crop diversion from SOU 23-Ulu Remis in June and September 2023, the Unit of Certification (UoC) requested an Extension of Volume, which RSPO approved on 09/10/2023, with the following details:
  - Product: FFB\_estates Additional Volume: 173,351.71 MT
  - Product: CSPK Additional Volume: 8,481.31 MT
  - Product: CSPO Additional Volume: 33,828.56 MT
- (2) On 15/12/2023, RSPO granted another Volume Extension request, with the following details:
  - Product: FFB\_estates Additional Volume: 54,000.00 MT
  - Product: CSPK Additional Volume: 2,700.00 MT
  - Product: CSPO
     Additional Volume: 11,070.00 MT

As a result, the latest RSPO-approved Certified Volume for the period of Mar 23 – Feb 24 is as follows:

- Product: FFB\_estates RSPO-approved Certified Volume: 372,881.30 MT
- Product: CSPK RSPO-approved Certified Volume: 18,486.89 MT
- Product: CSPO RSPO-approved Certified Volume: 73,567.88 MT

10a.	10a. Monthly Records of Certified CPO & PK Since the Last Audit						
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)				
1	December 2022	2,281.33	594.33				
2	January 2023	1,893.67	536.33				
3	February 2023	1,902.62	488.87				
4	March 2023	1,867.29	491.24				
5	April 2023	1,501.73	380.55				
6	May 2023	511.82	136.51				
7	June 2023	3,762.48	931.87				
8	July 2023	3,114.29	693.12				
9	August 2023	3,916.54	954.05				
10	September 2023	4,771.59	1,150.47				
11	October 2023	3,928.30	958.43				
12	November 2023	4,583.87	1,174.41				
	TOTAL	34,035.53	8,490.18				

11. Summary of Actual Volume sold								
Current License	Current License period (Mar 23 – Nov 23)							
	RSPO Certified	Other Schen	nes Certified	Conventional	Total			
	KSPU Certified	ISCC	Others	Conventional	TOLAI			
CPO (MT)	356.85	1,821.09	0.00	25,699.31	27,877.25			
PK (MT)	999.26	0.00	0.00	5,796.17	6,795.43			
Credits	0.00	0.00	0.00	0.00	0.00			
<b>Previous Licens</b>	e period (Dec 22 -	- Feb 23)						
CPO (MT)	1,524.05	156.36	0.00	3,453.00	5,133.41			
PK (MT)	1,148.53	0.00	0.00	220.47	1,369.00			
Credits	0.00	0.00	0.00	0.00	0.00			
Note: Conventional	Note: Conventional is RSPO certified material but sold as non-RSPO.							

11A.	11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)							
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)				
1	Buyer ABC	TR-26250e97-ea44	40.08	0.00				
		TR-69f4fa4b-f79a	77.18	0.00				
2	Buyer EFG	TR-96c2fff4-aeee	89.59	0.00				
		TR-c7c50d04-31fb	30.65	0.00				
		TR-cbfb3349-21c5	80.01	0.00				
		TR-724577b6-a24c	39.34	0.00				
3	Buyer HIJ	TR-e7491af8-1423	552.26	0.00				
		TR-8de99a25-cac2	151.97	0.00				
		TR-98337c27-5d62	196.36	0.00				
		TR-70d89f99-f5ff	1.34	0.00				
		TR-82c040de-d63f	40.58	0.00				
		TR-e74fa85a-761c	581.54	0.00				
4	Buyer XYZ	TR-0e5f3552-4046	0.00	137.37				
		TR-dedb29b3-cb14	0.00	262.63				
		TR-76c03b6e-8b69	0.00	3.94				
		TR-ca2ac74b-ba1d	0.00	396.06				
		TR-252a72f8-f4fe	0.00	39.91				
		TR-f665e0c0-baec	0.00	159.35				
		TR-c360392c-5d14	0.00	554.28				
		TR-f69e4519-a1d4	0.00	194.44				
		TR-0a57d168-e192	0.00	399.81				
		TOTAL	1,880.90	2,147.79				

11B. R	11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)					
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)		
1	Buyer XXX	ISCC	1,821.09	0.00		
2	Buyer YYY	ISCC	0.00	156.36		
		TOTAL	1,821.09	156.36		

11C. R	11C. Records of CPO & PK Sold as conventional since the last audit (if any)						
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)				
1	Buyer 001	2,970.77	-				
2	Buyer 002	5,887.12	-				
3	Buyer 003	633.90	-				
4	Buyer 004	529.26	-				
5	Buyer 005	11,411.89	-				
6	Buyer 006	7,719.37	-				
7	Buyer 007	-	2,909.74				
8	Buyer 008	-	1,016.27				
9	Buyer 009	-	2,090.63				
	TOTAL	29,152.31	6,016.64				

11D. R	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. Inde	12. Independent Smallholders Certified Tonnage (MT) / Volume								
	Estimated Last Year			Actual			Forecast		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
Plidse	40%	70%	100%	40%	<b>70</b> %	100%	40%	<b>70</b> %	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	12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)	
1	N/A	N/A	N/A	N/A	N/A	N/A	
	TOTAL	N/A	N/A	N/A	N/A	N/A	

13. Indep	13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE	
Current Lice	Current License period (key in period)							
Credits				N/A	N/A	N/A	N/A	
Physical	N/A	N/A	N/A					
Previous Lie	Previous License period (key in period)							
Credits				N/A	N/A	N/A	N/A	
Physical	N/A	N/A	N/A					

13A	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)	PKO Sold	Certified PKE Sold (MT/credit)
1	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		TOTAL	N/A	N/A	N/A	N/A	N/A

### **Section 2: Assessment Process**

#### **Certification Body:**

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

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

#### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **11/12/2023** – **15/12/2023**. 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 was based on the formula  $(\sqrt{y}) \times (z)$ ; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

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

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

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

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.

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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)	<b>Year 2</b> (ASA2-1)	<b>Year 3</b> (ASA2-2)	<b>Year 4</b> (ASA2-3)	<b>Year 5</b> (ASA2-4)		
Hadapan Palm Oil Mill	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$		
Kulai Estate	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$		
Layang Estate	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$		
Seri Pulai Estate	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$		
CEP Rengam Estate	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$		

#### Tentative Date of Next Visit: December 9, 2024 - December 13, 2024

#### **Total Number of Mandays: 15 Mandays**

#### 2.2 BSI Assessment Team

Name	Role	Competency
Name Mohamad Amirul Saifullah bin Mohamad Senan (MAS)	Role Team Leader	<b>Competency</b> <b>Education:</b> Holds a Bachelor of Agricultural Science from Universiti Putra Malaysia. <b>Work Experience:</b> With over 6 years of experience in oil palm plantation operations, agriculture, safety, and health-related fields, he has been an integral part of a large publicly listed plantation organization since 2012. His job responsibilities include supervising and monitoring estate operations to ensure compliance with RSPO, ISCC, and MSPO requirements and regulations, Good Agricultural Practice, and other standard operating procedures. He has also actively participated in internal audits of plantation operations to ensure adherence to RSPO, ISCC, and MSPO requirements. Subsequently, he spent 6 years working with an international Certification Body (CB), conducting certification audits of plantation operations for compliance with RSPO, MSPO, and ISCC requirements. He is a qualified Lead Auditor for RSPO P&C, RSPO Supply Chain, ISCC, MSPO OPMC, and
		MSPO Supply Chain certification audits, as well as a qualified Auditor for ISO 9001:2015 certification audits. Since January 2019. he has conducted audits in various countries, including Malaysia, Indonesia, Cambodia, Thailand, Singapore, Japan, India, Germany, and Spain. His expertise extends to the Palm Oil sector, encompassing industry fundamentals such as good agricultural practices (GAP), best management practices (BMP), sustainability, social issues (e.g., worker welfare and employment terms, gender issues), occupational health and safety (OHS) matters, and environmental considerations (e.g., pollution control and resource conservation).

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		Training attended: Attended, completed and passed ISO 9001:2015         Lead Auditor Course (CQI-IRCA certified), ISO 45001:2018 Lead Auditor         Course (CQI-IRCA certified), RSPO P&C Lead Auditor Course (endorsed by         RSPO Secretariat), RSPO Supply Chain Certification Training Course         (endorsed by RSPO Secretariat), RSPO P&C 2018 Version Introduction         Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification         Update Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification         Update Course (endorsed by RSPO Secretariat), MSPO Lead Auditor Course         (endorsed by MPOCC), MSPO Supply Chain Certification Training Course         (endorsed by MPOCC), ISCC EU and PLUS Basic Training, ISCC Greenhouse         Gas Training, ISCC Waste and Residues Training, SA8000 Introduction &         Basic Auditor Course, and HCV-HCSA Assessor Training Course.         Language proficiency: Fluent in Bahasa Malaysia and English languages.         Aspect covered in this audit:         □ Good Agriculture Practice ⊠ Health and Safety ⊠ Supply chain         requirements □ Social □ Environmental ⊠ Market Communication and         claim requirements
Nor Halis Abu Zar (NHA)	Team Member	<b>Education:</b> Holds a Bachelor of Science in Plantation Technology and Management, University Technology Mara
		<b>Work Experience:</b> He has 6 years' experience in Oil Palm Estate Management with Kulim Plantations Sdn. Bhd. The last position held was Assistant Manager. His experience includes the day-to-day estate operations and ensures the implementation of RSPO, ISCC and MSPO certification. He is a qualified Lead Auditor for MSPO and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.
		<b>Training attended:</b> He has completed ISO IMS 9001 and 14001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor Course, Endorsed RSPO SCC Lead Auditor Course, ISO 45001 Lead Auditor Course, ISO 9001:2015 Lead Auditor Course, MSPO SCCS Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training by RSPO Secretariat and SMETA Requirement Training.
		Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English
		Aspect covered in this audit: ⊠ Good Agriculture Practice □ Health and Safety □ Supply chain requirements □ Social ⊠ Environmental □ Market Communication and claim requirements



Mohd. Razaleigh Mohamad (MRM)	Team Member	<b>Education:</b> Holds a Bachelor's Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).
		<b>Work Experience:</b> He has 5 years' experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.
		<b>Training attended:</b> He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed MSPO P&C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&C and SCCS).
		Language proficiency: Fluent in English and Bahasa Malaysia
		Aspect covered in this audit: □ Good Agriculture Practice □ Health and Safety □ Supply chain
		requirements

#### Accompanying Persons:

Name	Role
N/A	N/A

#### 2.3 Assessment Plan

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

Date	Time	Subjects	MAS	MRM	NHA
Monday,	08:30 - 09:00	Opening Meeting:	$\checkmark$	$\checkmark$	$\checkmark$
11/12/2023		Opening Presentation by Lead Auditor			
Seri Pulai		<ul> <li>Confirmation of assessment scope and finalize Audit plan</li> </ul>			
Estate	09.00 – 12.30	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. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	V	$\checkmark$	V
	12.30 - 13.30	Lunch break	$\checkmark$	$\checkmark$	$\checkmark$



Date	Time	Subjects	MAS	MRM	NHA
	13.30 – 17:00	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	V	V	V
	17:00 - 17:30	Interim Closing briefing	$\checkmark$	$\checkmark$	$\checkmark$
Tuesday, 12/12/2023 Kulai Estate	08:30 – 12:30	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. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	V	V	V
	12:30 - 13:30	Lunch break	$\checkmark$	$\checkmark$	$\checkmark$
	13:30 – 17:00	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	V	V	V
	17:00 - 17:30	Interim Closing briefing.	$\checkmark$	$\checkmark$	$\checkmark$
Wednesday, 13/12/2023 Hadapan Palm Oil Mill	08:30 –12:30	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	V	V	V
	12:30 - 13:30	Lunch break	$\checkmark$	$\checkmark$	$\checkmark$
	13:30 – 17:00	Lab, weighbridge, and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	V	V	V
	17:00 - 17:30	Interim Closing briefing.	$\checkmark$	$\checkmark$	$\checkmark$

Date	Time	Subjects	MAS	MRM	NHA
Thursday 14/12/2023 CEP Renggam Estate	08:30 –12:30	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. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	V	V	V
	12:30 - 13:30	Lunch break	$\checkmark$	$\checkmark$	$\checkmark$
	13.30 – 17:00	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	V	V	V
	17:00 - 17:30	Interim Closing briefing.	$\checkmark$	$\checkmark$	$\checkmark$
Friday 15/12/2023 Layang Estate	08:30 –12:30	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. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	V	V	V
	12:30 - 13:30	Lunch break	$\checkmark$	$\checkmark$	$\checkmark$
	13:30 - 16:00	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	V	V	V
	16:00 - 16:30	Audit Team Discussion and report preparation	$\checkmark$	$\checkmark$	$\checkmark$
	16.30 - 17:30	Closing Meeting	$\checkmark$	$\checkmark$	$\checkmark$

### **Section 3: Assessment Findings**

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

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?	Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table. On 16/01/2020, Sime Darby Plantation Berhad under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://simedarbyplantation.com/sime-darby- plantation-completes-the-divestment-of-its-liberia- operations/	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As of Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management. Refer TBP approval dated 13/07/2023.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	<ul> <li>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.</li> <li>(1) Ladang Panjang Estate: 1,796.19 Ha.</li> <li>(2) Rantau Panjang Estate, Napal Estate / Karang Ringin Estate: 1,843.73 Ha.</li> <li>(3) Mangun Jaya Estate: 1,398.55 Ha.</li> <li>(4) Sungai Jernih Estate: 851.57 Ha.</li> <li>(5) Pelanjau Estate (PT BAL) &amp; Beturus Estate (PT BAL): 4,071.76 Ha.</li> <li>(6) Karya Palma Estate (PT SNP): 476.70 Ha.</li> <li>(7) West and East Estate: 1,452.93 Ha.</li> </ul>	Complied

Any deviations from the maximum	Although there is deviation has been identified at those	Complied
periods requires approval by the RSPO Secretariat.	Indonesia management units, but it has been justified and approved by RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	<ul> <li>Indonesia</li> <li>PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.</li> <li>PT Mitral Austral Sejahtera: The properties were sold and currently 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.</li> <li>Malaysia</li> <li>Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate has been transferred to SOU Lavang.</li> <li>Bintang Oil Mill: 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.</li> </ul>	Complied
	<ul> <li><u>Papua New Guinea</u></li> <li>Markham Farming Company Limited (MFCL)/ Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement</li> <li><u>Liberia</u></li> <li>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): <u>https://simedarbyplantation.com/sime-darby- plantation-completes-the-divestment-of-its-liberia- operations/</u>.</li> </ul>	

	ACOP 2022 has been cross-referenced as below: https://rspo.org/members/1-0008-04-000-00/	
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/ 2023.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	<ul> <li>New plantings within Sime Darby Plantation Berhad that have completed NPP notification: <ol> <li>NBPOL (Poliamba Limited) 23/05/2020 <ul> <li>no comments</li> <li>https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</li> </ul> </li> <li>NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 <ul> <li>no comments</li> <li>https://rspo.org/public-consultation/new-britain-palm-oil-a-subsidiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/</li> </ul> </li> <li>NBPOL (Ramu Agri Industries Limited) 29/01/2018 <ul> <li>no comments</li> <li>https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</li> </ul> </li> <li>NBPOL (Ramu Agri Industries Limited) 02/09/2016 <ul> <li>no comments</li> <li>https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</li> </ul> </li> <li>NBPOL (Ramu Agri Industries Limited) 02/09/2016 <ul> <li>no comments</li> <li>https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</li> </ul> </li> <li>NBPOL (Ramu Agri Industries Limited) 02/09/2016 <ul> <li>no comments</li> <li>https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</li> </ul> </li> <li>NBPOL (Higaturu Oil Palms) 21/06/2016 <ul> <li>no comments</li> <li>https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</li> </ul> </li> </ol></li></ul>	Complied

	(7) NBPOL (Poliamba Limited – Lamendauen) 07/04/	
	2014	
	<ul> <li>no comments captured in RSPO website</li> </ul>	
	https://rspo.org/public-consultation/nbpol-	
	poliamba-limited-lamendauen-png/	
	(8) NBPOL (Roka Mini estate) 04/11/2013	
	<ul> <li>no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-</li> </ul>	
	palm-oil-ltd-roka-mini-estate/	
	(9) NBPOL (J estate) 01/11/2013	
	<ul> <li>no comments captured in RSPO website</li> </ul>	
	https://rspo.org/public-consultation/new-britain-	
	<u>palm-oil-ltd-j-estate/</u>	
	(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/	
	(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/	
	(12) Sime Darby (Liberia) Plantation Inc 06/03/2012	
	<ul> <li>– no comments captured in RSPO website</li> </ul>	
	https://rspo.org/public-consultation/sime-darby-	
	liberia-plantation-inc-new-planting-assessment/	
	(13) Sime Darby (Liberia) Plantation Inc 06/03/2012	
	<ul> <li>no comments captured in RSPO website</li> </ul>	
	https://rspo.org/public-consultation/sime-darby-	
	liberia-plantation-inc-new-planting-assessment-1/	
	(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/	
	Management units for 12, 14 shows were dispessed	
	Management units for 12 – 14 above were disposed.	Come l'al
Any Land conflicts are being resolved through a mutually agreed process,	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP	Complied
such as RSPO Complaints System or	as both sites was disposed.	
Dispute Settlement Facility, in	The RaCP tracker was checked. There are 21	
accordance with RSPO P&C criteria 4.4,	Management units that have potential liabilities. There	
4.5, 4.6, 4.7 and 4.8.	are some discrepancies between RaCP tracker and	
	actual scenario due possibility of assets disposal. As per	
	the data audited, there are 19 management units for the	
	Indonesia Operations that requires LUCA. All LUCAs	
	were submitted but the review was delayed due to	

change of RSPO reviewer. As of August 2023, 16 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO. 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.	
Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.	Complied
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	
Sime Darby Plantation maintains corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.	Complied
Under RSPO DSF, the latest registered complaint for SD was in 2017. No latest complaint case reported in DSF.	
Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue is mainly waiting for Land Titles. The last audit was conducted in July 2022. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. HCV Assessment has been conducted for all SDP operations since 2010, there has been no clearance of HCV areas after the HCV Assessment has been conducted and	Complied
	<ul> <li>19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO.</li> <li>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C.</li> <li>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.</li> <li>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</li> <li>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, no labour dispute issues reported.</li> <li>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.</li> <li>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</li> <li>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</li> <li>Sime Darby Plantation maintains corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</li> <li>Under RSPO DSF, the latest registered complaint for SD was in 2017. No latest complaint case reported in DSF.</li> <li>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance st</li></ul>

	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?	Respective sites are maintaining the stakeholder engagements as part of the estates/mills' operations. Especially in Indonesia, socialization of company.	Complied

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

## **Progress of Scheme Smallholders or Outgrowers Towards Compliance with Relevant Standards**

Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	There are no scheme smallholders and/ or outgrowers include in the scope of certification.	Not Applicable
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.		

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

#### **Approved Time Bound Plan**

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Total Managed Area	Certification Status	Plan Year for Certification	Actual Certification	Date of Last TBP Verified	(Only a		OF THE TBP nen revision is	made)
			(Ha)	(Certified / Not Certified)		Year	and Approved by CB	Any revision from the last approved TBP? (Yes / No)		Justification of changes for each UoC	approval
Manggala	Indonesia	Manggala Mill	13,836.00	Certified	N/A	23-Nov-10					
	Indonesia	Manggala -1 Estate	4,919.00	Certified	N/A	23-Nov-10					
	Indonesia	Manggala -2 Estate	4,922.00	Certified	N/A	23-Nov-10					
	Indonesia	Manggala -3 Estate	3,995.00	Certified	N/A	23-Nov-10					
Alur Dumai	Indonesia	Alur Dumai Mill	3,759.00	Certified	N/A	16-Jan-12					
	Indonesia	Alur Dumai Estate	3,759.00	Certified	N/A	16-Jan-12					
Teluk Siak	Indonesia	Teluk Siak Mill	11,555.31	Certified	N/A	11-Oct-11					
	Indonesia	Teluk Siak Estate	3,321.20	Certified	N/A	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	3,799.21	Certified	N/A	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	448.00	Not Certified	2023	N/A		Yes	2024	Land legalization process for 448 ha at Pinang Sebatang Estate is still in process.	13-Jul-23
	Indonesia	Aneka Persada Estate	4,434.90	Certified	N/A	11-Oct-11					
Blang Simpo	Indonesia	Blang Simpo Mill	8,777.22	Certified	N/A	3-May-13					
[	Indonesia	Blang Simpo -1 Estate	3,460.06	Certified	N/A	3-May-13					
Ī	Indonesia	Blang Simpo -2 Estate	2,677.83	Certified	N/A	3-May-13					
Ī	Indonesia	Tamiang (PT PPP) Estate	1,451.99	Certified	N/A	3-May-13					
	Indonesia	Batang Ara (PT PSK) Estate	1,187.34	Certified	N/A	3-May-13					

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Teluk Bakau	Indonesia	Teluk Bakau Mill	13,317.81	Certified	N/A	11-Oct-11				
	Indonesia	Teluk Bakau Estate	4,025.07	Certified	N/A	11-Oct-11				
	Indonesia	Nusa Lestari Estate	3,456.74	Certified	N/A	11-Oct-11				
	Indonesia	Nusa Perkasa Estate	5,836.00	Certified	N/A	11-Oct-11				
Mandah	Indonesia	Mandah Mill	12,366.18	Certified	N/A	1-Apr-14				
	Indonesia	Mandah Estate	5,053.18	Certified	N/A	1-Apr-14				
	Indonesia	Rotan Semelur Estate	7,313.00	Certified	N/A	1-Apr-14				
Sungai Pinang	Indonesia	Sungai Pinang Mill	6.51	Certified	N/A	11-Sep-12				
	Indonesia	Sungai Pinang Estate	3,374.42	Certified	N/A	11-Sep-12				
	Indonesia	Bukit Pinang Estate	3,138.58	Certified	N/A	11-Sep-12				
Ladang Panjang	Indonesia	Ladang Panjang Mill	1,202.04	Certified	N/A	9-Jul-12				
	Indonesia	Ladang Panjang Estate	1,202.04	Certified	N/A	9-Jul-12				
	Indonesia	Ladang Panjang Estate	1,796.19	Not Certified	2023	NA	Yes	2024	Land legalization process for 1,796.19 ha is still in progress.	13-Jul-23
Rantau Panjang	Indonesia	Rantau Panjang Mill	10,139.91	Certified	N/A	16-Mar-12				
	Indonesia	Bumi Ayu Estate	2,960.98	Certified	N/A	16-Mar-12				
	Indonesia	Rantau Panjang Estate	2,679.74	Certified	N/A	16-Mar-12				
	Indonesia	Rantau Panjang Estate	1,843.73	Not Certified	2023	NA	Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Napal Estate/Karang Ringin	4,359.74	Certified	N/A	16-Mar-12				

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	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	N/A	16-Mar-12		Ī		
	Indonesia	Mangun Jaya Estate	1,398.55	Not Certified	2023	N/A	Yes	2024	Land legalization process of 1398.55 ha is still in process.	13-Jul-23
	Indonesia	Sungai Jernih Estate	851.57	Not Certified	2023	N/A	Yes	2024	Land legalization process of 851.57 ha is still in process.	13-Jul-23
Angsana	Indonesia	Angsana Mill	15,151.19	Certified	N/A	6-Jul-11				
	Indonesia	Angsana Estate	3,250.06	Certified	N/A	6-Jul-11				
	Indonesia	Gunung Sari Estate	2,826.94	Certified	N/A	6-Jul-11				
Mustika	Indonesia	Mustika Mill	14,840.76	Certified	N/A	3-Jul-13				
	Indonesia	Mustika Estate	3,648.74	Certified	N/A	3-Jul-13				
	Indonesia	Pantai Bonati Estate	2,534.00	Certified	N/A	6-Jul-11				
Gunung Aru	Indonesia	Gunung Aru Mill	12,740.54	Certified	N/A	5-Jul-11				
	Indonesia	Gunung Aru Estate	2,684.41	Certified	N/A	5-Jul-11				
	Indonesia	Gunung Kemasan Estate	3,511.36	Certified	N/A	5-Jul-11				
	Indonesia	Laut Timur Estate	3,207.28	Certified	N/A	5-Jul-11				
	Indonesia	Pantai Timur Estate	3,337.49	Certified	N/A	5-Jul-11				

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Ungkaya	Indonesia	Ungkaya Mill	4,145.00	Certified	N/A	10-Jul-12		
	Indonesia	Ungkaya Estate	4,145.00	Certified	N/A	10-Jul-12		
Rantau	Indonesia	Rantau Mill	24,169.56	Certified	N/A	30-Dec-11		
	Indonesia	Rantau Estate	4,638.00	Certified	N/A	30-Dec-11		
	Indonesia	Matalok Estate	3,082.00	Certified	N/A	30-Dec-11		
	Indonesia	Selabak Estate ( PT SAA)	3,757.67	Certified	N/A	16-Mar-12		
	Indonesia	Randi Estate (PT SAA)	2,882.98	Certified	N/A	16-Mar-12		
	Indonesia	Sangkoh Estate (PT SAA)	3,789.34	Certified	N/A	16-Mar-12		
	Indonesia	Lanting Estate (PT LMR)	3,249.27	Certified	N/A	16-Mar-12		
Betung	Indonesia	Betung Mill	7,579.57	Certified	N/A	1-Apr-14		
	Indonesia	Betung Estate	4,266.00	Certified	N/A	1-Apr-14		
	Indonesia	Sekayu Estate	3,313.57	Certified	N/A	1-Apr-14		
Bebunga	Indonesia	Bebunga Mill	14,274.77	Certified	N/A	16-Mar-12		
	Indonesia	Bebunga Estate	3,958.43	Certified	N/A	16-Mar-12		
	Indonesia	Bakau Estate	5,342.14	Certified	N/A	16-Mar-12		
	Indonesia	Sungai Cengal Estate	4,974.20	Certified	N/A	16-Mar-12		
Pondok Labu	Indonesia	Pondok Labu Mill	15,876.20	Certified	N/A	16-Mar-12		
	Indonesia	Pondok Labu Estate	3,569.53	Certified	N/A	16-Mar-12		
	Indonesia	Binturung Estate	4,072.01	Certified	N/A	16-Mar-12		
	Indonesia	Rampa Estate	3,656.20	Certified	N/A	16-Mar-12		
	Indonesia	Sesulung Estate	4,578.46	Certified	N/A	16-Mar-12		
Sekunyir	Indonesia	Sekunyir Mill	7,734.59	Certified	N/A	23-Nov-10		
	Indonesia	Sekunyir Estate	3,555.19	Certified	N/A	23-Nov-10		
	Indonesia	Seruyan Estate	4,179.40	Certified	N/A	23-Nov-10		
Sukamandang	Indonesia	Sukamandang Mill	14,779.92	Certified	N/A	5-Jul-11		
	Indonesia	Sukamandang Estate	3,936.56	Certified	N/A	5-Jul-11		
	Indonesia	Sapiri Estate	3,530.90	Certified	N/A	5-Jul-11		
	Indonesia	Baras Danum Estate	3,664.60	Certified	N/A	5-Jul-11		
	Indonesia	Kuala Kuayan Estate	3,647.86	Certified	N/A	5-Jul-11		

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Pemantang	Indonesia	Pemantang Mill	16,601.66	Certified	N/A	5-Jul-11				
	Indonesia	Pemantang Estate	3,857.91	Certified	N/A	5-Jul-11				
	Indonesia	Kawan Batu Estate	4,400.00	Certified	N/A	5-Jul-11				
	Indonesia	Hatantiring Estate	3,811.00	Certified	N/A	5-Jul-11				
	Indonesia	Batang Garing Estate	4,532.75	Certified	N/A	5-Jul-11				
Lembiru	Indonesia	Lembiru Mill	9,409.07	Certified	N/A	3-Jul-14				
	Indonesia	Lembiru Estate	4,929.49	Certified	N/A	3-Jul-14				
	Indonesia	Awatan Estate	3,476.79	Certified	N/A	3-Jul-14				
	Indonesia	Pelanjau Estate (PT BAL)	1,002.79	Certified	N/A	3-Jul-19				
	Indonesia	Pelanjau Estate (PT BAL)	4,071.76	Not Certified	2023	N/A	Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Beturus Estate (PT BAL)	4,071.76	Not Certified	2023	N/A	Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Karya Palma Estate (PT SNP)	476.70	Not Certified	2023	N/A	Yes	2024	Land legalization process for 476.70 ha is still in process.	13-Jul-23
Bukit Ajong	Indonesia	Bukit Ajong Mill	11,498.82	Certified	N/A	18-Oct-10				
	Indonesia	West Estate	4,562.34	Certified	N/A	18-Oct-10		Ì		
	Indonesia	West Estate	1,452.93	Not Certified	2023	N/A	Yes	2024	Land legalization process for 1452.93 ha (West and	13-Jul-23

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										East Estate) is still in process.	
	Indonesia	East Estate	2,665.48	Certified	N/A	18-Oct-10					
	Indonesia	East Estate/Sei Mawang	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
Sungai Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Anak Kulim Estate	1,523.35	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Somme Estate	941.56	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Padang Buluh Estate	4,008.47	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Jentayu Estate	2,178.59	Certified	N/A	12-Aug-10	19-20 July 2021				
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Chersonese Estate	3,293.72	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Kalumpong Estate	2,716.80	Certified	N/A	5-Oct-11	19-20 July 2021				

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	Malaysia	Tali Ayer Estate	3,756.10	Certified	N/A	5-Oct-11	19-20 July 2021		
	Malaysia	Holyrood Estate	1,332.74	Certified	N/A	5-Oct-11	19-20 July 2021		
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	N/A	18-Jun-11	19-20 July 2021		
	Malaysia	Kamuning Estate	3,888.43	Certified	N/A	18-Jun-11	19-20 July 2021		
	Malaysia	Elphil Estate	1,865.43	Certified	N/A	18-Jun-11	19-20 July 2021		
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	N/A	18-Jun-11	19-20 July 2021		
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	N/A	5-Oct-11	19-20 July 2021		
	Malaysia	Flemington Estate	1,906.84	Certified	N/A	5-Oct-11	19-20 July 2021		
	Malaysia	Bagan Datoh Estate	3,781.86	Certified	N/A	5-Oct-11	19-20 July 2021		
	Malaysia	Sabak Bernam Estate	2,511.79	Certified	N/A	5-Oct-11	19-20 July 2021		
	Malaysia	Sg. Samak Estate	3,025.74	Certified	N/A	5-Oct-11	19-20 July 2021		
Seri Intan/ Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	N/A	3-Mar-11	19-20 July 2021		
	Malaysia	Selaba Oil Mill	1,549.75	Certified	N/A	3-Mar-11	19-20 July 2021		
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	N/A	3-Mar-11	19-20 July 2021		
	Malaysia	Sabrang Estate	3,945.23	Certified	N/A	3-Mar-11	19-20 July 2021		
	Malaysia	Sogomana Estate	2,214.08	Certified	N/A	3-Mar-11	19-20 July 2021		

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	Malaysia	Sg. Wangi Estate	2,226.66	Certified	N/A	3-Mar-11	19-20 July 2021		
	Malaysia	Bikam Estate	2,075.16	Certified	N/A	3-Mar-11	19-20 July 2021		
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	N/A	3-Mar-11	19-20 July 2021		
Tennamaram	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	N/A	3-Mar-11	19-20 July 2021		
	Malaysia	Tennamaram Estate	1,981.60	Certified	N/A	3-Mar-11	19-20 July 2021		
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	N/A	3-Mar-11	19-20 July 2021		
	Malaysia	Bukit Talang Estate	3,572.44	Certified	N/A	3-Mar-11	19-20 July 2021		
Bukit Kerayong	Malaysia	Bukit Kerayong Oil Mill	6,346.90	Certified	N/A	15-Apr-11	19-20 July 2021		
	Malaysia	Bukit Kerayong Estate	2,699.28	Certified	N/A	15-Apr-11	19-20 July 2021		
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	N/A	15-Apr-11	19-20 July 2021		
East	Malaysia	East Oil Mill	10,902.94	Certified	N/A	19-May-10	19-20 July 2021		
	Malaysia	East Estate	5,634.45	Certified	N/A	19-May-10	19-20 July 2021		
	Malaysia	Sepang Estate	2,092.28	Certified	N/A	19-May-10	19-20 July 2021		
	Malaysia	Dusun Durian Estate	3,176.21	Certified	N/A	19-May-10	19-20 July 2021		
West	Malaysia	West Oil Mill	5,912.69	Certified	N/A	19-May-10	19-20 July 2021		
	Malaysia	West Estate	5,912.69	Certified	N/A	19-May-10	19-20 July 2021		

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Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	N/A	7-Jul-11	19-20 July 2021		
Kerdau	Malaysia	Kerdau Oil Mill	13,781.50	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	Kerdau Estate	5,683.04	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	Mentakab Estate	3,266.49	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	Chenor Estate	2,834.98	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	Sg Mai Estate	1,996.99	Certified	N/A	7-Jul-11	19-20 July 2021		
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	Jabor Estate	2,332.92	Certified	N/A	7-Jul-11	19-20 July 2021		
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	N/A	30-Dec-11	19-20 July 2021		
	Malaysia	Labu Estate	4,529.72	Certified	N/A	30-Dec-11	19-20 July 2021		
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	N/A	19-May-10	19-20 July 2021		
	Malaysia	Tanah Merah Estate	4,341.73	Certified	N/A	19-May-10	19-20 July 2021		
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	N/A	19-May-10	19-20 July 2021		
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	N/A	18-Feb-14	19-20 July 2021		
	Malaysia	Sua Betong Estate	2,870.75	Certified	N/A	18-Feb-14	19-20 July 2021		

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	Malaysia	Sengkang Estate	2,831.51	Certified	N/A	18-Feb-14	19-20 July 2021		
	Malaysia	Bradwall Estate	3,828.34	Certified	N/A	18-Feb-14	19-20 July 2021		
	Malaysia	PD Lukut Estate	1,523.79	Certified	N/A	18-Feb-14	19-20 July 2021		
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	N/A	18-Feb-14	19-20 July 2021		
	Malaysia	Sg. Bahru Estate	1,427.31	Certified	N/A	18-Feb-14	19-20 July 2021		
	Malaysia	Salak Estate	3,868.86	Certified	N/A	18-Feb-14	19-20 July 2021		
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	Muar River Estate	1,584.62	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	Kok Foh Estate	2,275.84	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	St. Helier Estate	1,992.65	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	N/A	7-Jul-11	19-20 July 2021		
	Malaysia	Pertang Estate	1,052.49	Certified	N/A	7-Jul-11	19-20 July 2021		
Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	N/A	20-May-10	19-20 July 2021		
	Malaysia	Kempas Estate	4,505.45	Certified	N/A	20-May-10	19-20 July 2021		

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	Malaysia	Tangkah Estate	2,537.78	Certified	N/A	20-May-10	19-20 July 2021		
	Malaysia	Kemuning Estate	2,671.05	Certified	N/A	20-May-10	19-20 July 2021		
	Malaysia	Serkam Estate	2,114.23	Certified	N/A	20-May-10	19-20 July 2021		
Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	N/A	5-Oct-11	19-20 July 2021		
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	N/A	5-Oct-11	19-20 July 2021		
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	N/A	5-Oct-11	19-20 July 2021		
	Malaysia	Welch Estate	1,447.82	Certified	N/A	5-Oct-11	19-20 July 2021		
Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	N/A	28-Jan-14	19-20 July 2021		
	Malaysia	Pagoh Estate	2,325.93	Certified	N/A	28-Jan-14	19-20 July 2021		
	Malaysia	Lanadron Estate	1,964.44	Certified	N/A	28-Jan-14	19-20 July 2021		
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	N/A	28-Jan-14	19-20 July 2021		
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	N/A	18-Nov-10	19-20 July 2021		
	Malaysia	Chaah Estate	2,795.36	Certified	N/A	18-Nov-10	19-20 July 2021		
	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	N/A	18-Nov-10	19-20 July 2021		
	Malaysia	North Labis Estate	3,532.91	Certified	N/A	18-Nov-10	19-20 July 2021		

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Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	N/A	19-May-10	19-20 July 2021		
	Malaysia	Gunung Mas Estate	3,466.17	Certified	N/A	19-May-10	19-20 July 2021		
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	N/A	19-May-10	19-20 July 2021		
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	N/A	19-May-10	19-20 July 2021		
	Malaysia	Yong Peng Estate	2,975.41	Certified	N/A	19-May-10	19-20 July 2021		
Bukit Benut	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	N/A	5-Oct-11	19-20 July 2021		
	Malaysia	Bukit Benut Estate	2,799.78	Certified	N/A	5-Oct-11	19-20 July 2021		
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	N/A	5-Oct-11	19-20 July 2021		
	Malaysia	CEP Nyior Estate	1,955.19	Certified	N/A	5-Oct-11	19-20 July 2021		
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	N/A	11-Apr-11	19-20 July 2021		
	Malaysia	Ulu Remis Estate	2,598.25	Certified	N/A	11-Apr-11	19-20 July 2021		
	Malaysia	Cenas Estate	1,974.06	Certified	N/A	11-Apr-11	19-20 July 2021		
	Malaysia	Bukit Badak Estate	3,234.25	Certified	N/A	11-Apr-11	19-20 July 2021		
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	N/A	11-Apr-11	19-20 July 2021		
	Malaysia	Pekan Estate	3,258.70	Certified	N/A	11-Apr-11	19-20 July 2021		
	Malaysia	Sembrong Estate	1,778.88	Certified	N/A	11-Apr-11	19-20 July 2021		

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Hadapan	Malaysia	Hadapan Palm Oil Mill	11,371.82	Certified	N/A	29-Mar-11	19-20 July 2021		
	Malaysia	Sri Pulai Estate	2,049.87	Certified	N/A	29-Mar-11	19-20 July 2021		
	Malaysia	Kulai Estate	3,023.42	Certified	N/A	29-Mar-11	19-20 July 2021		
	Malaysia	Layang Estate	3,258.90	Certified	N/A	29-Mar-11	19-20 July 2021		
	Malaysia	CEP Renggam Estate	3,039.63	Certified	N/A	29-Mar-11	19-20 July 2021		
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	N/A	1-Oct-08	19-20 July 2021		
	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	N/A	1-Oct-08	19-20 July 2021		
	Malaysia	Tunku Estate	3,199.05	Certified	N/A	1-Oct-08	19-20 July 2021		
	Malaysia	Tigowis Estate	2,074.02	Certified	N/A	1-Oct-08	19-20 July 2021		
	Malaysia	Sentosa Estate	3,545.54	Certified	N/A	1-Oct-08	19-20 July 2021		
	Malaysia	Segaliud Estate	4,820.13	Certified	N/A	1-Oct-08	19-20 July 2021		
Melalap	Malaysia	Melalap Oil Mill	5,246.18	Certified	N/A	21-Jan-11	19-20 July 2021		
	Malaysia	Melalap Estate	2,096.73	Certified	N/A	21-Jan-11	19-20 July 2021		
	Malaysia	Sapong Estate	3,149.45	Certified	N/A	21-Jan-11	19-20 July 2021		
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	N/A	16-Jan-09	19-20 July 2021		
	Malaysia	Binuang Estate	3,271.08	Certified	N/A	16-Jan-09	19-20 July 2021		

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	Malaysia	Sungang Estate	3,407.98	Certified	N/A	16-Jan-09	19-20 July 2021		
	Malaysia	Tingkayu Estate	1,881.08	Certified	N/A	16-Jan-09	19-20 July 2021		
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	N/A	16-Jan-09	19-20 July 2021		
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	N/A	16-Jan-09	19-20 July 2021		
	Malaysia	Giram Estate	4,166.98	Certified	N/A	16-Jan-09	19-20 July 2021		
	Malaysia	Mostyn Estate	4,178.04	Certified	N/A	16-Jan-09	19-20 July 2021		
Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	N/A	16-Jan-09	19-20 July 2021		
	Malaysia	Merotai Estate	3,052.66	Certified	N/A	16-Jan-09	19-20 July 2021		
	Malaysia	Imam Estate	3,773.56	Certified	N/A	16-Jan-09	19-20 July 2021		
	Malaysia	Tiger Estate	2,497.86	Certified	N/A	16-Jan-09	19-20 July 2021		
	Malaysia	Table Estate	2,221.63	Certified	N/A	16-Jan-09	19-20 July 2021		
Layang	Malaysia	Lavang Oil Mill	24,836.54	Certified	N/A	30-Dec-11	19-20 July 2021		
	Malaysia	Lavang Estate	4,363.83	Certified	N/A	30-Dec-11	19-20 July 2021		
	Malaysia	Rasan Estate	3,454.00	Certified	N/A	30-Dec-11	19-20 July 2021		
	Malaysia	Belian Estate	2,847.00	Certified	N/A	30-Dec-11	19-20 July 2021		
	Malaysia	Kelida Estate	2,460.00	Certified	N/A	30-Dec-11	19-20 July 2021		

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	Malaysia	Lavang (Special) Estate	included under Lavang Estate Ha	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Pekaka Estate	2,626.14	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Ruai Estate	2,460.96	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Dulang Estate	2,548.00	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Charquest Estate	1,448.71	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Paroh Estate	2,627.90	Certified	N/A	30-Dec-11	19-20 July 2021	
Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Rajawali Estate	6,087.27	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Samudera Estate	3,308.60	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Semarak Estate	2,248.68	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Bayu Estate	2,459.90	Certified	N/A	30-Dec-11	19-20 July 2021	
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Derawan Estate	2,490.79	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Sahua Estate	2,644.00	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Takau Estate	2,107.00	Certified	N/A	30-Dec-11	19-20 July 2021	
	Malaysia	Damai Estate	2,287.04	Certified	N/A	30-Dec-11	19-20 July 2021	

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Guadalcanal Plains Palm Oil Limited	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	N/A	18-Mar-11	19-20 July 2021	
(GPPOL)	Solomon Islands	Tetere Estate	2,947.79	Certified	N/A	18-Mar-11	19-20 July 2021	
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	N/A	18-Mar-11	19-20 July 2021	
	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	N/A	18-Mar-11	19-20 July 2021	
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	N/A	18-Mar-11	19-20 July 2021	
	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	N/A	18-Mar-11	19-20 July 2021	
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	N/A	18-Mar-11	19-20 July 2021	
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	N/A	18-Mar-11	19-20 July 2021	
Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	N/A	15-Feb-13	19-20 July 2021	
	Papua New Guinea	Giligili Estate	1,095.47	Certified	N/A	15-Feb-13	19-20 July 2021	
	Papua New Guinea	Hagita Estate	2,450.02	Certified	N/A	15-Feb-13	19-20 July 2021	
	Papua New Guinea	Waigani Estate	2,341.13	Certified	N/A	15-Feb-13	19-20 July 2021	
	Papua New Guinea	Sagarai Estate	2,864.55	Certified	N/A	15-Feb-13	19-20 July 2021	
	Papua New Guinea	Padipadi Estate	4,517.67	Certified	N/A	15-Feb-13	19-20 July 2021	
	Papua New Guinea	Mariawatte Estate	1,680.14	Certified	N/A	15-Feb-13	19-20 July 2021	
	Papua New Guinea	Smallholders - East Gurney Estate (259)	450.59	Certified	N/A	15-Feb-13	19-20 July 2021	

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						-			
	Papua New Guinea	Smallholders - West Gurney Estate (231)	479.13	Certified	N/A	15-Feb-13	19-20 July 2021		
	Papua New Guinea	Smallholders - East Sagarai Estate (156)	283.93	Certified	N/A	15-Feb-13	19-20 July 2021		
	Papua New Guinea	Smallholders - West Sagarai Estate (212)	345.96	Certified	N/A	15-Feb-13	19-20 July 2021		
Poliamba (POL)	Papua New Guinea	Poliamba Oil Mill	10,720.53	Certified	N/A	19-Mar-12	19-20 July 2021		
	Papua New Guinea	Kara Estate	1,032.10	Certified	N/A	19-Mar-12	19-20 July 2021		
	Papua New Guinea	Nalik Estate	2,666.75	Certified	N/A	19-Mar-12	19-20 July 2021		
	Papua New Guinea	West Coast Estate	627.60	Certified	N/A	19-Mar-12	19-20 July 2021		
	Papua New Guinea	Noatsi Estate	2,064.10	Certified	N/A	19-Mar-12	19-20 July 2021		
	Papua New Guinea	Madak Estate	1,517.11	Certified	N/A	19-Mar-12	19-20 July 2021		
	Papua New Guinea	Smallholders -North Division (615)	1,022.12	Certified	N/A	19-Mar-12	19-20 July 2021		
	Papua New Guinea	Smallholders- South Division (866)	1,257.21	Certified	N/A	19-Mar-12	19-20 July 2021		
	Papua New Guinea	Smallholders -West Division (309)	533.54	Certified	N/A	19-Mar-12	19-20 July 2021		
Ramu Agricultrual Industries Ltd (RAIL)	Papua New Guinea	Gusap Mill	14,606.08	Certified	N/A	5-Aug-10	19-20 July 2021		
	Papua New Guinea	Gusap East (Gusap) Estate	2,856.45	Certified	N/A	5-Aug-10	19-20 July 2021		
	Papua New Guinea	Gusap West (Paddox) Estate	3,019.09	Certified	N/A	5-Aug-10	19-20 July 2021		
	Papua New Guinea	Surinam Estate	2,154.14	Certified	N/A	5-Aug-10	19-20 July 2021		

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	Papua New Guinea	Dumpu Estate	2,254.36	Certified	N/A	5-Aug-10	19-20 July 2021		
	Papua New Guinea	Ngaru Estate	854.33	Certified	N/A	5-Aug-10	19-20 July 2021		
	Papua New Guinea	J Estate (Jephcott) Estate	2,824.01	Certified	N/A	5-Aug-10	19-20 July 2021		
	Papua New Guinea	Smallholders - Madang VOPs (71)	360.00	Certified	N/A	5-Aug-10	19-20 July 2021		
	Papua New Guinea	Smallholders - Morobe VOPs (253)	283.70	Certified	N/A	5-Aug-10	19-20 July 2021		
Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill		Certified	N/A	1-Feb-13	19-20 July 2021		
	Papua New Guinea	Mamba Oil Mill		Certified	N/A	1-Feb-13	19-20 July 2021		
	Papua New Guinea	Embi Estate	1,737.78	Certified	N/A	1-Feb-13	19-20 July 2021		
	Papua New Guinea	Ambogo Estate	2,040.00	Certified	N/A	1-Feb-13	19-20 July 2021		
	Papua New Guinea	Sangara Estate	1,780.00	Certified	N/A	1-Feb-13	19-20 July 2021		
	Papua New Guinea	Sumbiripa Estate	2,545.00	Certified	N/A	1-Feb-13	19-20 July 2021		
	Papua New Guinea	Mamba Estate	4,013.10	Certified	N/A	1-Feb-13	19-20 July 2021		
	Papua New Guinea	Sambogo Estate	2,637.85	Certified	N/A	1-Feb-13	19-20 July 2021		
	Papua New Guinea	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	N/A	1-Feb-13	19-20 July 2021		
	Papua New Guinea	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	N/A	1-Feb-13	19-20 July 2021		
	Papua New Guinea	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	N/A	1-Feb-13	19-20 July 2021		

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	Papua New Guinea	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	N/A	1-Feb-13	19-20 July 2021		
	Papua New Guinea	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	N/A	1-Feb-13	19-20 July 2021		
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Kumbango Oil Mill		Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Kapiura Mill		Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Numundo Mill		Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Waraston Mill		Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Bebere Estate	2,226.71	Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Kumbango Estate	2,610.80	Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Togulo Estate	1,509.20	Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Dami Estate	1,507.00	Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Waisisi Estate	1,090.00	Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Kautu Estate	4,280.60	Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Karausu Estate	2,387.64	Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Moroa Estate	848.16	Certified	N/A	10-Sep-08	19-20 July 2021	 	
	Papua New Guinea	Bilomi Estate	2,011.70	Certified	N/A	10-Sep-08	19-20 July 2021		

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		1	r	r	1	r r		1	
Papua New Guinea	Loata Estate	562.00	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Haella Estate	4,220.30	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Garu Estate	3,709.60	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Daliavu Estate	2,484.10	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Sapuri Estate	2,180.90	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Malilimi Estate	3,837.00	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Rigula Estate	3,720.00	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Nomundo Estate	2,645.17	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Lolokoru Estate	2,453.10	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Ove Estate	3,541.00	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Tamare Estate	1,362.70	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Smallholders LSS Mosa (1822)	5,008.53	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Smallholders VOP East (1817)	5,324.37	Certified	N/A	10-Sep-08	19-20 July 2021			
Papua New Guinea	Smallholders VOP Central (1964)	5,756.57	Certified	N/A	10-Sep-08	19-20 July 2021			

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	Papua New Guinea		2,804.10	Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Smallholders LSS Kapiura (551)	551.00	Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Smallholders VOP Kapiura (850)	847.00	Certified	N/A	10-Sep-08	19-20 July 2021		
	Papua New Guinea	Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20)	700.37	Certified	N/A	10-Sep-08	19-20 July 2021		
Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	N/A	27-Mar-20	19-20 July 2021	There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.	
	Papua New Guinea	Munum Estate	1,734.57	Certified	N/A	27-Mar-20	19-20 July 2021		
	Papua New Guinea	Maralumi Estate	2,427.15	Certified	N/A	27-Mar-20	19-20 July 2021		
	Papua New Guinea	Erap Estate	1,237.68	Certified	N/A	27-Mar-20	19-20 July 2021		

### 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 two (2) Opportunity for Improvement raised. The Strategic Operating Unit (SOU 24) – Hadapan Palm Oil Mill & Supply Bases Certification Unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective 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 #	2435775-202312-N1	Issued Date	15/12/2023						
Due Date	Next Surveillance audit	Closure Date	"Open"						
Indicator & Category (Critical / Minor)	7.3.1 (Minor)	7.3.1 (Minor)							
Statement of Nonconformity:	Waste Management Plan w	Waste Management Plan was not effectively implemented.							
Requirement Reference:		A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.							
Objective Evidence:	<ul> <li>from furniture (specific of. This practice is inco</li> <li>(2) Location: Hadapan Pala During a site visit to the dumping of waste at t not in compliance with section on Domestic W from office and worker</li> </ul>	e ne landfill area, it was noted cally, metal board and iron) v nsistent with the Waste Mana m Oil Mill and Layang Estate ( ne linesite area, it was observ he back section of the labor n the Waste Management Pla Vaste, which outlines "To colle housing complex and bin and	vere improperly disposed agement Plan. Hadapan Div.) ved that there was illegal quarters. This practice is an, specifically under the ect other domestic waste						
	(3) Location: Kulai Estate During a site visit at Kelan Division, it was found that a used apron, originally designated for chemical spraying, was found in House No. 207B. In an interview with the employee, it was revealed that the standard protocol involves returning such aprons to the employer for proper disposal. However, in this case, the apron was retained for alternative uses.								
Corrections:	<ol> <li><u>Layang Estate</u> Estate management have removed the metal board &amp; iron part from the landfill area and placed it at scrap iron yard area.</li> <li><u>Hadapan Palm Oil Mill and Layang Estate</u> Estate and mill have immediately cleared the improperly dumped domestic waste at the stated area and disposed accordingly at designated area.</li> </ol>								

	(3) <u>Kulai Estate</u> Used apron has been collected from the stated house and stored at designated area for further disposal as scheduled waste and checking will be conducted at another sprayer's house to ensure no PPE brought back.
Root Cause Analysis:	<ol> <li>Ineffective monitoring/inspection at housing area by Estates/Mill Management to support weekly housing inspection conducted by Medical Assistant in ensuring implementation of proper waste disposal to be in place.</li> <li>Ineffective briefing given by the estates/mill management to workers on waste management including segregation of waste which resulting improper waste management.</li> </ol>
Corrective Actions:	(1) Weekly housing inspection by Person In charge of Accommodation PIOA/MA will be supported by quarterly Employee Welfare Committee (EWC) joint inspection and outcome of the findings will be discussed in the quarterly EWC meeting. For landfill area, spot-check will be conducted by EWC representative to ensure proper waste disposal.
	(2) Briefing to all workers on the responsibility to ensure proper domestic waste disposal including segregation of waste and enhance the briefing content to emphasize on the importance of waste management.
Assessment Conclusion:	The CAPs were accepted on 05-Jan-2024. The effective implementation of the corrective actions will be verified during next audit (ASA 2_4). Status "Open".

Oppor	tunity for Improvements
OFI #	Description
OFI 1	2435775-202312-I1
	<ul> <li><u>Indicator 3.6.1</u> <ul> <li>(1) Location: Hadapan Palm Oil Mill &amp; audited estate             <ul></ul></li></ul></li></ul>
	(HI), or permanent standard threshold shift (PSTS). However, only 2 workers are required to undergo a Medical Examination, and retests for 4 workers are pending. Appointments have been scheduled with OHD on 14/12/2023. This will be further followed up during the next assessment.
OFI 2	2435775-202312-I2
	Indicator 3.7.1 Location: CEP Renggam Estate To further enhance the capabilities of the NEST caretakers, the management could explore possibilities and requirements related to the early education course (Kurgus Asuban BERMATA) under Jabatan
	and requirements related to the early education course ( <i>Kursus Asuhan PERMATA</i> ) under <i>Jabatan Kebajikan Masyarakat</i> (JKM).

Positiv	Positive Findings					
PF #	Description					
PF 1	The audit team received commendable cooperation from both the site and headquarters teams.					
PF 1	Positive feedback from stakeholders during consultations further attests to the effectiveness of the collaborative efforts.					

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

Previous Audit Critical (Major) Non-conformity				
NCR Ref #	2287730-202212-M1	Issued Date	16/12/2022	
Due Date	20/03/2023 Closure Date 24/02/2023			
Indicator & Category (Critical / Minor)	3.8.12 (iv) (a) (Critical)			
Statement of Nonconformity:	Delivery records of RSPO ce month basis.	ertified CPO and PK were no	t balanced within three-	
<b>Requirement Reference:</b>	For mass balance module, th	e mill:		
		e all receipts of RSPO certifi PK on a real-time basis and /		
Objective Evidence:	Based on RSPO Mass Balancing Record for Oil Mills (Hadapan Palm Oil Mill); Negative stock recorded after CSPK delivery in February 2022. Total closing stock for RSPO MB recorded at -35.40 mt. Stock was not balanced within 3 months and total of -525.56 mt accumulated for April 2022 closing stock. Negative stock accumulated until end November 2022 with total of – 1,240.34 mt.			
Corrections:	<ol> <li>GSC management already informed GTM through email to stop immediately the sales of RSPO CSPK to balance the Mass Balance sale to positive stock during period under review.</li> <li>To increase certified FFB supply and volume of certified PK to balance the</li> </ol>			
	<ul><li>negative stock with indicate over dispatch.</li><li>(3) To revise the MB sheet as provided by GSC team which shown the latest formula for volume of 'Balance' and 'Carry Forward'.</li></ul>			
Root Cause Analysis:	(1) Over-despatch of sales of RSPO CSPK because of breakdown communication with GTM.			
	(2) The calculation for PK/CSPK volume for 'Balance' and 'Carry Forward' for CPO and PK are not correct.			
	(3) Monitoring & Tracking on SCCS mass balance sheet for RSPO not effective.			
	(4) Insufficient training for PIC for documenting Mass Balance Sheet.			
Corrective Actions:	<ol> <li>PIC to have the SCCS training by GSC on Annual basis.</li> <li>To key in MB Sheet and monitoring on monthly basis by SCCS Person in charge. PIC will inform mill management and GCS team if any over dispatch for further action.</li> </ol>			
	(3) To communication with GTM on monthly basis for clarification on MB product sales on Palm Trace.			

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Assessment Conclusion:	As per verification on data and production report, the data in mass balance sheet was accurate. From the new mass balance sheet, the monitoring record showed that the oversold RSPO CSPK was reduce from 1,240.34 MT into -973.80 MT. The management already starting sold the CSPK as uncertified product and stop selling CSPK as RSPO certified since after audit. These corrections and corrective actions have effectively addressed the identified non-conformance. Consequently, the Major Non-Conformity was officially closed on 24/02/2023.
Effectiveness Closure (for previous audit closed Critical NC):	<ul> <li>The corrective action implemented has been deemed sufficient and effective, evidenced by the following:</li> <li>(1) A recent training session was conducted on 15/09/2023 by Regional Sustainability &amp; Quality Management (RSQM) personnel, with attendance from the Mill Manager and Assistant Mill Manager.</li> <li>(2) The latest MB Sheet for November 2023 was observed, inputted by the Person in Charge (PIC), and verified by the Mill Manager.</li> <li>(3) Ongoing communication with GTM has been established on a monthly basis, including a clarification on MB product sales through Palm Trace, as documented in the email dated 03/12/2023.</li> <li>No similar non-compliance was identified during the recent audit (ASA 2_3). Thus, the Major NC raised during the previous audit (ASA 2_2) was remain closed.</li> </ul>

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2287730-202212-M2	Issued Date	16/12/2022
Due Date	20/03/2023	Closure Date	24/02/2023
Indicator & Category (Critical / Minor)	3.3.2 (Critical)		
Statement of Nonconformity:	The implementation of procedures for Personal protective Equipment (SD/SDP/PSQM(ESH)/201-OS16) and OSH Risk Management Procedure (Doc Number: UM/HSE/SP/01) was not consistently monitored.		
<b>Requirement Reference:</b>	A mechanism to check consis	tent implementation of proce	dures is in place.
Objective Evidence:	As per Personal protective Equipment (SD/SDP/PSQM(ESH)/201-OS16) dated January 2015 stated:- 6.1.1.10 Employers should ensure that the employees who are required to wear PPE are fully informed of the requirements and of the reasons for them, and are given adequate training in the selection, wearing, maintenance and storage of this equipment. Found that the reception station attendant in Hadapan Palm Oil Mill was wearing rubber boats. This was not in line with the SOU 24 Hadapan Palm Oil Mill HIRARC for Reception Station that states Existing Control: Safety Shoes.		
	The risks and hazards associate to the operations of the Shovel at the Reception Station was not assessed in the HIRARC. This was against the UM HSE Management System – OSH Risk Management Procedure (Doc Number: UM/HSE/SP/01) which states "To identify all the hazards in the workplace." There also found mechanism to monitor faulty machineries were not effectively implemented. It was noticed that the Shovel reverse siren was not functioning. Interview with the driver indicated that the siren has not been functioning for the last 2 months. Nevertheless, the		

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	shovel driver has not reported the issue to the current management. Verified that the daily checklist prior to operation did not capture faulty parts as well.	
Corrections:	<ul><li>(1) Mill immediately informed worker on safety of wearing PPE to the worker.</li><li>(2) Mill management immediate to repaired reverse siren for shovel.</li></ul>	
Root Cause Analysis:	<ol> <li>(1) Lapse on safety inspection of their workstation due to rainy day by workers. As rubber boot only for cleaning activity during non-processing day.</li> <li>(2) Miscommunication between the shovel driver and OU management due to PIC was transferred to the other mills and major changes in management.</li> </ol>	
Corrective Actions:	<ol> <li>Mill management to conducted safety and PPE awareness training for the worker.</li> <li>Mill Management to conduct safety training to shovel operator/driver. Shovel operator will inspect the shovel daily by using shovel inspection checklist before submitting the checklist to Mill management. The shovel inspection checklist includes all the main part of the shovel.</li> </ol>	
Assessment Conclusion:	From the document review on Investigation on issue record, Inspection list for shovel dated 31/1/2023 and 21/12/20222, record training on PPE and awareness of the shovel function dated 19/12/2022 and also training evaluation record. From the video call, the shovel already been fix and have a siren when its reverse. Interview by call with operator found that the operator was already fully understand pertaining to safety during driving the shovel. For the PPE workers issue, from the MS team interview found that they already understand and wearing the proper PPE during sorting the FFB. Hence, the major NC is effectively closed on 24/02/2023 with sufficient evidence of implementation.	
	These corrections and corrective actions have effectively addressed the identified non-conformance. Consequently, the Major Non-Conformity was officially closed on 24/02/2023.	
Effectiveness Closure (for previous audit closed Critical NC):	<ul> <li>The corrective action implemented has been deemed sufficient and effective, evidenced by the following:</li> <li>(1) Safety and Personal Protective Equipment (PPE) awareness training for mill workers was conducted by the mill management, with the latest session taking place on 22/08/2023.</li> <li>(2) Specifically for shovel operators/drivers, safety training sessions were organized by the Mill Management, with the latest training held on 18/09/2023.</li> <li>(3) Daily inspections of the shovel were carried out by the shovel operator, utilizing a comprehensive shovel inspection checklist covering all the main part of the shovel. The latest inspection conducted on 12/12/2023 and was duly verified by the Assistant Manager on the same date.</li> <li>No similar non-compliance was identified during the recent audit (ASA 2_3). Thus,</li> </ul>	
	the Major NC raised during the previous audit (ASA 2_2) was remain closed.	

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Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2287730-202212-M3	Issued Date	16/12/2022
Due Date	20/03/2023	Closure Date	24/02/2023
Indicator & Category (Critical / Minor)	7.2.11 (Critical)		
Statement of Nonconformity:	The implementation of proc	edures was not consistently m	nonitored.
Requirement Reference:		is undertaken by persons under other people that have medicant work.	
Objective Evidence:	During the visit to the chemical store, it was noticed that the storekeeper was a female who was currently pregnant. The management have mentioned that they are aware that the storekeeper is pregnant. Nevertheless, the pregnant storekeeper is still currently working as the chemical storekeeper and has not been offered alternative work as verified during the audit. Furthermore, there were excessive fumes coming out of the chemical store due to poor ventilation. This was against the company policy that states "Sprayer atau pekerja Wanita yang bekerja secara langsung dengan bahan kimia yang disahkan hamil akan ditugaskan ke bahagian lain sepanjang kehamilan" and memo dated 01/11/2022 entitled "Larangan Terlibat Dalam Urusan Berkaitan dengan Chemical"		
Corrections:	Estate management to follow memo that has been issued to storekeeper date 1st November 2022. Storekeeper immediately prohibited to involve with any chemical related job. The new appointed person in charge will cover all the operations in receiving, issuing of chemical.		
Root Cause Analysis:	Person In charge (Storekeeper) not properly understand on "danger exposes to chemical during pregnancy." As during the audit, she assists the auditor to open the chemical store door during site visits due to her sense of ownership and accountability for his scope of work.		
Corrective Actions:	Estate management to conduct refresher training to the storekeeper and all the female employee for improving their understanding of "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." Estate management to monitor by using "No work with chemical for new mother and pregnant lady" template every 2 month.		
Assessment Conclusion:	As per interview with Pn. Noryana and Ms. Prisya, they understand and aware that no work with chemical for new mother and pregnant lady. The management already conducted the training on 27/12/2022 attended 13 person, the evaluation record also available dated 27/12/2022 was verified. These corrections and corrective actions have effectively addressed the identified non-conformance. Consequently, the Major Non-Conformity was officially closed on 24/02/2023.		
Effectiveness Closure (for previous audit closed Critical NC):	The corrective action implemented has been deemed sufficient and effective, evidenced by the following:		

(1) Seri Pulai Estate: A new mother assessment was conducted on 1 female worker, employed as a storekeeper, on 06/06/2023. The sole request made by the new mother was for a dedicated space for breastfeeding or storing milk.
(2) Kulai Estate: The new mother assessment for a storekeeper who gave birth on 15/04/2023 was conducted twice, on 04/09/2023 and 04/07/2023.
(3) Layang Estate: On 01/08/2023, new mother assessments were conducted for 2 individuals. No special requests were made by these new mothers.
(4) CEP Renggam Estate: Assessments of new mothers were conducted on 23/05/2023 and 22/08/2023, identifying 3 workers who delivered in the year 2023.
(5) Hadapan Palm Oil Mill: A new mother assessment on 22/11/2023 covered 3 individuals, with one making a request for storing milk. The management promptly provided a refrigerator to address this request.
Upon verification, it was confirmed that none of the identified new mothers are involved in handling chemicals. There is concrete evidence that, upon pregnancy identification, the management proactively reassigns them to roles unrelated to chemical exposure. This confirmation was obtained through interviews with a sample of female workers and site visits.
No similar non-compliance was identified during the recent audit (ASA 2_3). Thus, the Major NC raised during the previous audit (ASA 2_2) was remain closed.

Previous Audit Minor Non-conformity			
NCR Ref #	2287730-202212-N1	Issued Date	16/12/2022
Due Date	15/12/2023	Closure Date	15/12/2023
Indicator & Category (Critical / Minor)	7.12.7 (Minor)		
Statement of Nonconformity:	Outcomes of the monitoring are not effectively fed back into the management plan.		
Requirement Reference:	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.		
Objective Evidence:	Based on site visit at Hadapan Division, P04A (water catchment - HCV 4); Visual observation at stagnant water near to HCV 4 area, unknown brownish coloured liquid was seen overflown to the catchment area. Latest HCV monitoring record on 8/12/22 has shown that no evidence of pollution (Can you spot any rubbish or oil or other pollution? and rated as no). No further investigation was made to ensure that brownish coloured liquid comply with surface water quality under NQWS Class IIA/B and not updated in the management plan.		
Corrections:	Estate management had discussed with the mill management team to carry out water sampling from the highlighted area to ensure there is not water pollution issue.		
Root Cause Analysis:	Estate management team has carried out complete side inspection surrounding the HCV 4 area to identify any caused as lead to the brownish of coloured at the stagnant water, However, there is no sign of leakages and unwanted issues found at the area.		

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Corrective Actions:	PIC to update HCV management plan and to continue the periodic inspections at the water catchment are (HCV 4).		
Assessment Conclusion:	The CAPs were accepted by previous Audit Team.		
	Based on the evidence, documents, and interview with selected personnel, it can be concluded that the corrective action was effectively implemented during the Annual Surveillance Audit (ASA 2_3), as details below:		
	(1) Monitoring for HCV Area and Animal Sighting was done. Refer Monitoring of Biodiversity And HCV Areas record as below:		
	Seri Pulai Estate: 02/12/2023		
	• Kulai Estate: 03/12/2023		
	Layang Estate: 07/12/2023		
	CEP Rengam Estate: 05/12/2023		
	(2) Based on interview with person in charge found have good awareness and monitoring was done on monthly basis.		
	No similar non-compliance was identified during the recent audit (ASA 2_3). Thus, the Minor NC raised during the previous audit (ASA 2_2) was closed.		

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

### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1997037-202012-M1	Critical	3.6.2	11/12/2020	Closed on 10/03/2021
1997037-202012-M2	Critical	6.7.3	11/12/2020	Closed on 10/03/2021
1997037-202012-N1	Minor	7.3.2	11/12/2020	Closed on 17/12/2021
2144368-202112-M1	Critical	3.4.3	17/12/2021	Closed on 10/03/2022
2144368-202112-M2	Critical	3.6.1	17/12/2021	Closed on 10/03/2022
2144368-202112-N1	Minor	3.3.2	17/12/2021	Upgrade into Major
2144368-202112-N2	Minor	6.2.5	17/12/2021	Closed on 16/12/2022
2144368-202112-N3	Minor	7.3.1	17/12/2021	Closed on 16/12/2022
2287730-202212-M1	Critical	3.8.12 (iv) (a)	16/12/2022	Closed on 24/02/2023
2287730-202212-M2	Critical	3.3.2	16/12/2022	Closed on 24/02/2023



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2287730-202212-M3	Critical	7.2.11	16/12/2022	Closed on 24/02/2023
2287730-202212-N1	Minor	7.12.7	16/12/2022	Closed on 15/12/2023
2435775-202312-N1	Minor	7.3.1	15/12/2023	"Open"

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

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Strategic Operating Unit (SOU 24) – Hadapan Palm Oil Mill & Supply Bases 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	Stakeholder Name / Organization	Means of Communication		
Neighbouring Estate	RXXXX MXXXX, Manager KXXX YXXX Estate	Face to face interview		
Local communities	Head of Villagers, KXXX PXXX, LXXX	Face to face interview		
Contractor	GXX SXXX EXXXrk	Face to face interview		
Local communities	Representative of MCXXX TXXX, XXXX Estate	Face to face interview		
Contractor	JXXX MXX SXX	Face to face interview		
Governmental agencies	Jabatan Tenaga Kerja, Segamat	Phone call interview		
Governmental agencies	Jabatan Kebajikan Masyarakat Sabak Bernam	Phone call interview		

Stake	Stakeholders' Comments		
1	Feedbacks: RXXX MXXX, Manager KXXX YXXX Estate		
	As per interview, there is no negative issues that has been highlighted by the stakeholders. He mentioned that he works in KXXX YXXXX Estate for nearly 3 years and has established good relationships with the management of Seri Pulai Estate and communication often done between him and the estate manager. He also has been invited for stakeholders' consultation and has been communicated with the procedure and policy that has been established by Sime Darby Plantations.		
	He also mentioned that there are no issues with land where clear demarcation of boundaries has been established by both parties.		
	All crops from KXXX YXXXX Estate supplied to Telok Sengat POM which located in Desaru which also RSPO certified.		
	Audit Team verification and response: No further verification required.		



2	
-	Feedbacks: Head of Villagers, KXXX PXXX, Layang- Layang
	En SXXX HXX SXXXX is the head of village of KXXXX PXXX since 2019. He mentioned that there are more 300 villagers which works as plantation workers, public and government agencies, and also owned piece of oil palm land.
	He mentioned that he is aware about the consultation and communication procedure that has been established and the person in charge to be contacted if there is any issues raise. He also mentioned that there is no requirement for any contribution for his village for now but aware it can be requested to the operating units.
	There are no activities in the estates that negatively impact the workers life in term of environment, safety and social aspect.
	He also mentioned that all estates under SOU 24 – Hadapan Palm Oil Mill & Supply Bases has been established before he was born. There are also no issues of land has been identified and the boundaries for estate land has been clearly demarcated
	Audit Team verification and response: No further verification required.
3	Feedbacks: GXXX SXXX EXXXXX
	GXXX SXXX EXXXXX the contractor for JCB hiring and has provided services for more than 10 years. He mentioned the tendering process has been done annual basis which he needs to submit price list of works. He also mentioned that tendering process has been made transparent.
	In term of payment, he mentioned that payment will be made no later than 10 <sup>th</sup> every month for invoices that has been submitted before 2 <sup>nd</sup> every month. He also can demonstrate his understanding on legal requirement, safety, environment, and social aspect.
	<b>Audit Team verification and response:</b> As per verification by the auditor, communication on the child labour and minimum ages requirement has been done on 17/01/2023 with attendance of contractor done by the assistant manager of Layang Estate. The statement of child labour and minimum ages requirement also has been stipulated in the Vendor COBC, February 2023 that has been signed by all contractors.
4	Feedbacks: Jabatan Tenaga Kerja, Kluang
	JTK representative responded that all operating units under SOU 24 – Hadapan Palm Oil Mill & Supply Bases comply with JTK requirement as at the day of audit and there is no grievance/ complaint received from any workers under SOU 24 – Hadapan Palm Oil Mill & Supply Bases. Representative from SOU 24 – Hadapan Palm Oil Mill & Supply Bases maintained good relationship with JTK and maintained update on any latest update of any requirement.
	Audit Team verification and response: No further verification required.
5	
	Feedbacks: Jabatan Kebajikan Masyarakat Sabak Bernam
	Jabatan Kebajikan Masyarakat has been contacted by auditor to understand the requirement of Taman Asuhan Kanak-Kanak (TASKA) and Pusat Jagaan Kanak- Kanak. The representative mentioned that definition of TASKA is for kids 4 years and below. She also mentioned there is some requirement from different agencies which are Jabatan Kesihatan, BOMBA and Pihak Berkuasa Tempatan.
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than that, pregnancy test has not been conducted for female workers but only self-assessment on pregnant symptom such as period delay and HA will advised to further check with government clinic. Representative also has been asked on discrimination and has been confirmed there is no discrimination has been practiced. All female workers received same benefits, leave and others. New mother assessment has been conducted for each operating units and has been confirmed by one of representative which also new mother.

Audit Team verification and response: No further verification required.

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
The Sime Darby Plantation estates in SOLL 24 – Hadanan Palm Oil Mill & Sunnly Bases have all completed the 2nd					

The Sime Darby Plantation estates in SOU 24 – Hadapan Palm Oil Mill & Supply Bases have all completed the 2nd Cycle of Replanting, rendering this aspect not applicable to the current situation.

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

#### 3.5 Impartiality and conflict of interest

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

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

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Strategic Operating Unit (SOU 24) – Hadapan Palm Oil Mill & Supply Bases has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Strategic Operating Unit (SOU 24) – Hadapan Palm Oil Mill & Supply Bases is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamad Amirul Saifullah bin Mohamad Senan	Name: Shylaja Devi Vasudevan Nair
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: Sime Darby Plantation Bhd
Title: Client Manager	Title: Head, Sustainability Compliance Unit, Group Sustainability Dept.
Signature:	<b>Signature:</b> ( <i>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.)
Date: 12 March 2024	Date: 4 April 2024



### **Appendix A: Summary of Findings**

	Criterion / Indicator	Assessment Findings	Compliance
Princip	Principle 1: Behave ethically and transparently		
	on <b>1.1:</b> The unit of certification provides adequate information to relevanistic languages and forms to allow for effective participation in decision m		RSPO Criteria, in
1.1.1	<ul> <li>(C) Documents that are specified in the RSPO P&amp;C are made available to the public.</li> <li>- Critical (Major) compliance -</li> </ul>	There is evidence that all documents that has been specified in the RSPO P&C has been made available to public. It has been verified based on the management systems that has been established through procedure which each operating units need to respond of any information request received. Each operating units need to verify and justify each request base on types of concerns. Process of request has been stipulated in the Standard operating manual (SOM) subsection 5.5; Procedure for external communication issuance date 01/04/2008. Other than that, policy of the company has been made available in the Sime Darby Plantation website.	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	All the document/information has been established in both Bahasa Malaysia and English. As per conversation with the management, if there is any request from the stakeholder who need explanation, the management of each operating unit is responsible to explain the information to the stakeholders.	Complied
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	There is no information request has been received for all operating units and has been verified based on the records and interview with stakeholders where there is only request for assistance recorded. As per interview, any information request will be recorded in the logbook.	Complied
1.1.4	<ul> <li>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</li> <li>- Critical (Major) compliance -</li> </ul>	Documented in the standard operating manual (SOM) subsection 5.5, management responsibility; appendix 5.5.3.2, Procedure for external communication. Communication of the policy has been done through the stakeholders' consultations that that has been conducted on	Complied

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		1	
		24/08/2023 with attendance for various stakeholders for all operating units under SOU 24 – Hadapan Palm Oil Mill & Supply Bases.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	List of stakeholders has been maintained and will be updated on annual basis or if there is any amendment of the stakeholders. Sighted information for the stakeholders has been maintained such as address and contact number.	Complied
Criterio	n 1.2: The unit of certification commits to ethical conduct in all business	s 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 -	Sime Darby Plantations Berhad has established ethical conduct policy which documented in the document code of business conduct policy that has been signed by Mohamad Helmy Othman Basha Group Managing Director. Stated in the policy that Sime Darby Plantation uphold 5 core values in all business transaction which are integrity, respect & responsibilities, enterprise and excellence.	Complied
		The latest SDPB's Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC).	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	SDPB established Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The code established in Bahasa Malaysia and English.	Complied
		SDPB's Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC).	
		Tendering process has been established where tendering process will be initiated by operating units and will be approved by regional office. Once approve, the document will be forwarded to tendering committee	

...making excellence a habit."

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-	le 2: Operate legally and respect rights on 2.1: There is compliance with all applicable local, national and ratified	and selection. There are some cases that direct awarded will be done due to certain circumstances such as insufficient supplier submitted quotation and others. Sample has been taken for the tendering process and compliance with the policy that has been established.	
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<ul> <li>Based on the records reviewed, observations during site visits, and interviews with relevant personnel, it has been verified that all operating units within SOU 24 – Hadapan Palm Oil Mill &amp; Supply Bases are in compliance with applicable legal requirements. There were no reported violations of the law involving any of the operating units, and no warning notices were issued by Malaysian government authorities to any of the units.</li> <li>Furthermore, each operating unit of the UoC has obtained and renewed the necessary licenses and permits as required by the law. Some of the sampled licenses and permits viewed in the mill and estates are as follows:</li> <li>Hadapan Palm Oil Mill:</li> <li>MPOB License No. 510425004000, valid until 29/02/2024</li> <li>Environment Department License No. 006385, valid until 30-June2024</li> <li>Installation Registration Certificate No. ST(SJB)P/S/JHR/01516 under the Electricity Supply Act 1990 - installed power aggregate is 3,500.05 kW, valid until 27/08/2024</li> <li>Certified Environmental Professional in Scheduled Waste Management: Certificate No. CePSWaM/04311, certified since 16/12/2020</li> </ul>	I

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Mill	fied Environmental Professional in the Treatment of Palm Oil Effluent: Certificate No. CePPOME/00333, certified since 9/2023	
Regis	ne Driver (Steam Engine and Steam Boiler) – Grade 2, stration No. JH/23/EIS/02/00591, registered since 2/2023	
	orised Entrant and Standby Person for Confined Space iP): Serial No. NW-SRO-AE-7609-U, valid until 14/10/2024	
	orised Gas Tester / Entry Supervisor (AGTES): Serial No. 23/AGTES/00/18948, valid until 22/12/2024	
	petent Person for Electrical: Certificate No. PJ-T-1-B-0209- ; category A0, since 06/01/2021	
	noid vaccine for canteen operator #W2A285V, valid until 1/2026	
2069	fired Pressure Vessel Qualification Certificate No. PMT-JH/23 956 for Pneumatic Tank No. JH PMT 13814, valid until 8/2024	
2069	fired Pressure Vessel Qualification Certificate No. PMT-JH/23 958 for Steam Receiver No. JH PMT 4820, valid until 8/2024	
	fired Pressure Vessel Qualification Certificate No. PMT-JH/23 959 for Air Receiver No. JH PMT 19805, valid until 21/08/2024	
	er Qualification Certificate No. PMD-JH/23 206960 for Water e Steam Boiler No. JH PMD 828, valid until 21/08/2024	
Seri Pulai	i Estate:	
MPOE	B License No. 520195002000, valid until 30-Apr-2024	

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<ul> <li>License to Drain or Abstract River Water under Section 7, Water Enactment (Johor) 1921: License No. 07/A/KJ/054, valid until 31- Dec-2023</li> </ul>	
<ul> <li>Scheduled Controlled Goods Permit No. J 004297 for 18,000 liters of diesel, valid until 08-Nov-2024</li> </ul>	
<ul> <li>Approval of Overtime Limitation Application Under Section 60A(4)(a) of the Labor Act 1955: Ref. No. BHG. PU/9/134 VOLUME 9 (11) dated 27-Mar-2017</li> </ul>	
<ul> <li>Approval of Wage Deduction Application Under Section 24 of the Labor Act 1955 for the Purpose of Electricity Bill Payment: Ref. No. BHG PU/9/129 VOLUME 38 (53) dated 06-Jul-2017</li> </ul>	
<ul> <li>Private Installation No. ST9SJB)P/S/JHR/00893, installed power aggregate = 20 kW, valid until 26-Apr-2024</li> </ul>	
<ul> <li>Non-fired Pressure Vessel Qualification Certificate No. PMT-JH/22 193876, valid until 07/03/2024 for air receiver no. JH PMT 3355</li> </ul>	
<ul> <li>Certificate of Registration (On Trial) No. P 1775 dated 24-May- 2023 in accordance with the terms of Registration of Estate Hospital Assistants, Act of Parliament No.12 of 1965.</li> </ul>	
<ul> <li>Emp. ID 0016728 Passed the Palm Nursery Management and Maintenance Course Examination on 09/28/2023</li> </ul>	
• Water Treatment Plan Operator: Emp. ID 16727 Typhoid vaccine injection, valid until 10/12/2026	
Kulai Estate:	
• MPOB License No. 508509102000, valid until 31/03/2023	
<ul> <li>Scheduled Controlled Goods Permit No. J 003789 for 8,000 liters of diesel, valid until 25-Jul-2024 for Main Division</li> </ul>	
<ul> <li>Scheduled Controlled Goods Permit No. J 003786 for 10,000 liters of diesel, valid until 29-May-2024 for Kelan Division</li> </ul>	

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<ul> <li>Non-fired Pressure Vessel Qualification Certificate No. PMT-JH/22 192921, valid until 06/02/2024 for air receiver no. JH PMT 5096</li> </ul>
<ul> <li>Non-fired Pressure Vessel Qualification Certificate No. PMT-JH/22 192918, valid until 24/01/2024 for air receiver no. JH PMT 3252</li> </ul>
<ul> <li>Registration Certificate No. Q 1800 dated 01/03/1997 as an Estate Hospital Assistant according to the terms of Registration of Estate Hospital Assistants, Act of Parliament No. 12 of 1965</li> </ul>
CEP Renggam
<ul> <li>MPOB License No. 508444202000, valid until 31/03/2024 – Selling and transport the FFB</li> </ul>
<ul> <li>MPOB License No. 621196011000, valid until 31/07/2024 – OP nursery</li> </ul>
<ul> <li>Scheduled Controlled Goods Permit No. J 005306 for 18,000 liters of diesel and 200 liters of petrol, valid until 12/20/2023</li> </ul>
<ul> <li>Registration Certificate No. Q 1879 dated 25/11/2004 as an Estate Hospital Assistant according to the terms of the Registration of Estate Hospital Assistants, Act of Parliament No. 12 of 1965</li> </ul>
<ul> <li>Emp. ID 94348 Passed the Palm Nursery Management and Maintenance Course Examination on 09/28/2023</li> </ul>
Layang Estate
• MPOB License No. 508443402000, valid until 31/03/2024
<ul> <li>Approval of Wage Deduction Application Under Section 24 of the Labor Act 1955 for the purpose of payment of union dues which is the National Union of Plantation Workers (NUPW) - Ref No. TK (NJ) U-23, dated 13/03/2019.</li> </ul>
<ul> <li>Approval of Wage Deduction Application Under Section 24 of the Employment Act 1955 for the purpose of payment of group</li> </ul>

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insurance coverage deduction for accident, hospitalization and surgery purposes – Ref No. TK (NJ) U-23, dated 13/03/2019.
<ul> <li>Approval of Wage Deduction Application Under Section 24 of the Work Act 1955 for the purpose of paying the mosque fund - Ref No. TK (NJ) U-23, dated 13/03/2019.</li> </ul>
<ul> <li>Approval of Wage Deduction Application Under Section 24 of the Employment Act 1955 for the purpose of temple fund payment - Ref No. TK (NJ) U-23, dated 13/03/2019.</li> </ul>
<ul> <li>Approval of Wage Deduction Application Under Section 24 of the Employment Act 1955 for the purpose of paying the loan for the purchase of a motorcycle - Ref No. TK (NJ) U-23, dated 13/03/2019.</li> </ul>
<ul> <li>Scheduled Controlled Goods Permit No. PBKB/2023/P/J-000089 for 32,760 liters of diesel, valid until 04/05/2025</li> </ul>
• Registration Certificate No. 18488 dated 20/08/2015 as a Medical Assistant under the provisions of the Medical Assistant Act 1977.
<ul> <li>Non-fired Pressure Vessel Qualification Certificate No. PMT-JH/23 197110, valid until 10/04/2024 for air receiver no. JH PMT 2914 located at Layang Division.</li> </ul>
<ul> <li>Non-fired Pressure Vessel Qualification Certificate No. PMT-JH/23 197111, valid until 10/04/2024 for air receiver no. JH PMT 2915 located at Hadapan Division</li> </ul>
These licenses, permits, and certifications indicate that the UoC has fulfilled the necessary requirements and standards set by regulatory bodies. The proper maintenance of licenses and permits demonstrates the commitment of the company to operate in accordance with legal obligations.

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		Overall, the compliance with applicable legal requirements, the possession of licenses and permits, and the certifications obtained by personnel indicate that the UoC has taken the necessary measures to ensure compliance with legal and regulatory frameworks.	
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 -	The framework for ensuring compliance with legal and other requirements is systematically outlined in the Estate/Mill Quality Management System at Level 2, as detailed in the Standard Operating Manual, Appendix 5.2.4, dated 10 December 2008. This procedure is integrated into the Estate & Mill Quality Management System (EQMS & MQMS), disseminated to all operating units under SOU 24. The Group Sustainability Department (GSD) and individual operating units jointly shoulder the responsibility for identifying, managing, updating, and tracking legal requirements. This encompasses monitoring the status of legal compliance. The most recent update occurred on 11-Dec-2023, encompassing legislative additions such as the Employment (Amendment) Act 2021, Empty Fruit Bunches Management Plan Guidelines 2021, Poisons (Amendment) Act 2022, and Wildlife Conservation (Amendment) Act 2022. To streamline this process, each Operating Unit (OU) designates RSPO/MSPO representatives, typically one of the Assistant Managers, tasked with monitoring compliance and updating changes in regulatory requirements. The appointment letters for these representatives were verified, including the Senior Assistant at CEP Renggam Estate (dated 04/08/2023).	Complied
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	Legal or authorized boundaries have been distinctly demarcated and visibly maintained, as confirmed during the site visit. When the land boundaries adjoin third parties such as smallholders, villages, or other oil palm companies, the standard practice involves the establishment of trenches and parameter roads. This practice was consistently	Complied

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-	-	-
		observed and clearly visible during the field visit to all the visited estates. The verification process included examining boundary records and monthly patrolling records. Specific observations at each estate are as follows:
		(1) Seri Pulai Estate:
		<ul> <li>Sighted the boundary at P15C adjacent to Boustead Kulai Young Estate.</li> </ul>
		<ul> <li>Verified that no planting extends beyond these legal or authorized boundaries.</li> </ul>
		(2) Kulai Estate:
		- Observed the boundary at P10A neighboring a village.
		<ul> <li>Confirmed that there is no planting beyond these legal or authorized boundaries.</li> </ul>
		(3) CEP Rengam Estate:
		<ul> <li>Identified the boundary at P10A neighboring KTM Railway Station.</li> </ul>
		<ul> <li>Verified that no planting exceeds these legal or authorized boundaries.</li> </ul>
		(4) Layang Estate:
		- Examined the boundary at P98B1 adjacent to smallholders.
		<ul> <li>Verified that there is no planting beyond these legal or authorized boundaries.</li> </ul>
Criteri	on 2.2: All contractors providing operational services and supplying labor	ur, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.
2.2.1	A list of contracted parties is maintained. - Minor compliance -	List of contracted parties are included in the stakeholder lists, which are maintained by each operating unit. The information in the stakeholder lists includes name and addresses of contractors, their contact person and contact numbers.

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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 -	<ul> <li>SDPB established Contractor &amp; Vendor Management Procedures (Date Approved: 17/11/2021). The objectives of the procedures:</li> <li>To define the procedure for managing the overall contractor's workers throughout Upstream Malaysia operations which includes provisions for safety, health, social, security, environmental, governance</li> <li>and legal compliance.</li> <li>To provide guidance to Management on the processes of selecting</li> <li>and monitoring of C&amp;V.</li> <li>To protect the safety &amp; health of employees &amp; other people at workplace.</li> <li>To ensure only C&amp;V with acceptable standards are allowed to do business &amp; work within SDP OUs</li> </ul>	Complied
		<ul> <li>The contract agreement/letter of award contains specific clauses on meeting applicable legal requirements which stated under Compliance with applicable laws and guidelines.</li> <li>Based on the sampled contracts in 2.2.1, there is a Vendor Integrity Pledge</li> <li>(VIP) or in Bahasa Malaysia 'Ikrar Integriti Vendor' that consists of:</li> <li>Vendor Code of Business Conduct (VCOBC)</li> <li>Labour and Human Rights</li> <li>Environment, safety and Health</li> <li>Ethics and Management Practices</li> <li>All applicable laws and regulations relating to anti-bribery, fraud and corruption: and the following anti-corruption principles</li> </ul>	

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		<ul> <li>Committing to promote values of integrity, transparency, accountability and good corporate governance</li> </ul>	
		> Strengthening internal systems that support corruption prevention	
		<ul> <li>Fighting any form of corrupt practice</li> </ul>	
		> Supporting corruption prevention initiatives by the Government	
		and the local authorities	
		Evidence of legal due diligence of all OCPs, contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors are submitted at the time of audit. The payslip of the contractor workers being maintained and reviewed by respective estate and mill management in the contractor's personal file. Based on the payslip for month of September 2023. All contractor workers were paid more than minimum wages. Due diligence is also conducted via Online Vendor Registration (OVR) to check the legality of the business entities.	
		This comprehensive approach in the agreements ensures a robust framework for legal compliance, ethical practices, and commitment to industry standards.	
2.2.3	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. - Minor compliance -	Sime Darby Plantation Berhad has established the Vendor Integrity Pledge and Vendor Code of Business Conduct (VCOBC). The VCOBC contains clauses disallowing child, forced and trafficked labour. It can be sighted under:	Complied
		5.7 Eradication of Exploitation - The Group endeavours to eradicate all forms of bonded and forced labour, slavery, human trafficking, and sexual exploitation by implementing International Labour Organisation (ILO) core labour standards and conventions. When supplying labour to perform work for the Group, Vendors shall refrain from using or facilitating any of the following activities:	

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Criterio	n 2.3: All FFB supplies from outside the unit of certification are from leg	<ul> <li>The Vendors' Employees are not charged with recruitment fees for the purpose of restricting free movement.</li> <li>Original identification documents of the Vendors' Employees such as passport or work permits are not retained involuntarily by Vendors.</li> <li>Payment of the Employees' salaries are not withheld or delayed beyond the extent permitted by applicable laws and regulations in the countries where the Vendors operate.</li> <li>In addition, the Vendors shall ensure that recruitment of its Employees and workers are done via legitimate recruitment agencies, which are properly licensed to operate under applicable laws.</li> <li>5.8 Abolishment of Child Labor &amp; Protecting the Rights of Children – The Group seeks to promote the well-being of children and safeguard them from any form of maltreatment or exploitation, including but not limited to child sex tourism, child trafficking, and child pornography. As such, Vendors shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate, unless in vocational and/or formal and structured apprenticeship, educational and training programmes.</li> <li>Verified against contractor list, OVR and signed copies of Vendor Integrity Pledge.</li> </ul>
2.3.1	<ul> <li>(C) For all directly sourced FFB, the mill requires:</li> <li>Information on geo-location of FFB origins</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> </ul>	The data related to directly sourced Fresh Fruit Bunches (FFB) has been thoroughly documented and is presented in a comprehensive manner. This inclusive list encapsulates all pertinent information, including GPS coordinates of the OCPs, copy of land titles, copy of MSPO Certificate, and copy of valid MPOB license. Specifically, there

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	<ul> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> <li>Critical (Major) compliance -</li> </ul>	are three direct OCPs (Outside Crop Producer), along with estates supplying FFB within the certification scope (Layang Estate, CEP Renggam Estate, Kulai Estate, and Seri Pulai Estate).	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1. - Minor compliance -	The mill is currently in the process of collecting information related to several indirectly sourced Fresh Fruit Bunches (FFB), as outlined in Indicators 2.3.1. Among the 15 identified indirect OCPs, 8 are actively supplying their FFB to Hadapan Palm Oil Mill. Detailed information regarding these indirect suppliers is available at Hadapan Palm Oil Mill.	Complied
		Referring to the email from the RSPO Secretariat to SDP management, which clarified that the RSPO Principles and Criteria (P&C) 2023 were not tabled for endorsement during the General Assembly (GA20), the matter of extending the Interim Measure has been raised with the Standard Standing Committee (SSC). As of 29 Nov 2023, the RSPO Secretariat has confirmed the extension of the fulfilment requirement for Indicator 2.3.2 until further announcement from the RSPO Secretariat.	
		Prior to this audit conducted, the PIC of the UoC from the Group Sustainability Department has submitted data and plan that consists of:	
		• the implementation progress and challenges report with evidence the status of compliance detailing the total number of indirect FFB suppliers with the number of indirect FFB suppliers whose evidence (as per Indicator 2.3.1) obtained and those yet to be obtained.	
		• A stepwise plan that outlines the actions and projected timeline towards complete fulfilment of the Indicator 2.3.2 requirement.	
		Since the dateline of the full implementation has been extended until further announcement from the RSPO Secretariat, therefore, the data and plan has been revised accordingly by the GSD of SDP. The data	

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Princip	le 3: Optimise productivity, efficiency, positive impacts and resi	and plan has been evaluated during the audit and verified that the data and plan contain the progress in meeting the requirement of Indicator 2.3.2 by the SDP management, particularly for SOU 24 – Hadapan Palm Oil Mill.	
Criterio	on 3.1: There is an implemented management plan that aims to achieve	long-term economic and financial viability.	
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	The mill's business plan is articulated through the annual budget (MPLAN) and a five-year projection, serving as a strategic guide for future planning. This comprehensive plan encompasses key metrics such as production of Crude Palm Oil (CPO), Oil Extraction Rate (OER), and Kernel Extraction Rate (KER), as well as utilization rates and Capital Expenditures (CAPEX). Similarly, the estates' business or management plan is presented through the annual budget (MPLAN) with a four-year projection spanning from 2023 to 2027. This budget includes crop projections and financial allocations for field operations and administration. To ensure fiscal responsibility, the management closely monitors expenditures through monthly progress reports and regular meetings, ensuring adherence to the budget and preventing overruns.	Complied
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	Under the guidance of the SDP top management, each estate has adopted a replanting cycle of 25 years as its direction. The replanting process is initiated by the Estate Manager who provides the Southern Regional Office with a comprehensive list of fields due for replanting, considering factors such as yields, palm heights, and ages. Subsequently, the top management conducts an evaluation to determine the specific fields and estates that will be involved in the replanting activities. Upon reaching a decision, the Regional CEO and Regional General Manager issue the Long Range Replanting Program (LRRP) to each	Complied

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	estate involved. This formalizes the strategic planning and sets a clear direction for the replanting activities in alignment with the overall goals and objectives of the organization.								
			ne annual replanting programme projected for a minimum of five ears with yearly review, is available for each estate as outlined as llows:						
			2024	2025	2026	2027	2028	TOTAL (Ha.)	
		Seri Pulai Estate	165.59	144.58	169.82	149.83	119.03	748.85	
		Kulai Estate	127.07	90.35	161.74	0.00	0.00	379.16	
		CEP Renggam Estate	287.00	179.00	186.00	187.00	148.00	987.00	
		Layang Estate	0.00	198.28	167.16	183.94	210.55	759.93	
		TOTAL (Ha.)	579.66	612.21	684.72	520.77	477.58	2,874.94	
		However, subject to						ties is still	
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 -	Bases has Meeting, s	committe scheduled agement l	ed to con after inte Review M	ducting ar ernal audit eetings fo	n annual I is and be	lanageme fore exter	II & Supply ent Review nal audits. have been	Complied
				Dil Mill: 12					
			ulai Estate Estate: 21	e: 11/09/2	023				
		makina			- I- :+ <sup>1M</sup>				

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		CEP Renggam Estate: 27/09/2023	
		<ul> <li>Layang Estate: 25/09/2023</li> </ul>	
		These meetings, chaired by the respective Operating Unit Managers, were attended by personnel with a vested interest in managing the implementation of the RSPO P&C Standard in each Operating Unit. The agenda of each meeting covered a range of essential topics, including:	
		(1) Matters Arising from Previous Meeting	
		(2) Changes in Regulations, Standards, Policies & Procedures in Relation to Sustainability Management System	
		(3) Review on Operation Performance & Product Conformity	
		(4) Review on Management Plans	
		(5) Results from System Audits & Assessments	
		(6) Stakeholders' Feedbacks and Complaints	
		(7) Resources for System Implementation	
		(8) Continual Improvement Plan	
		(9) Conclusion & Meeting Output	
		The minutes of these Management Review Meetings have been diligently documented and are available in each operating unit for review if necessary, providing a comprehensive record of discussions and decisions made during these crucial sessions.	
	<b>n 3.2</b> : The unit of Certification regularly monitors and reviews their econ w demonstrable Continuous improvement in key operations.	nomic, social and environmental performance and develops and implement	ts action plans
3.2.1	<ul> <li>(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.</li> <li>- Critical (Major) compliance -</li> </ul>	The management had established and implemented continuous improvement plan. The plans were described detail in Continuous Improvement Plan, OSH Plan, Social Improvement plan, Environmental Improvement Plan, and budget for CAPEX. Action plans	Complied

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for continual improvement on social and environment impact and opportunities for improvement in operational performance have been specified and documented for each operating unit.
The POM has identified and implemented the Continual Improvement Action Plans for FY2022/2023. Evident from the updated Continual Improvement Action Plans for FY2023/2024 that the plan still on going. Some of the plan as follow:
1. Workers housing roof replacement amount RMXXX,XXX.XX
2. Boiler Chimney Replacement amount RMXXX,XXX.XX
3. Refurbish futsal court amount RMXX,XXX.XX
The estates have identified and implemented the Continual Improvement Action Plans for FY2022/2023. Evident from the updated Continual Improvement Action Plans for FY2023/2024 at audited estates that the plan still on going. Some of the plan as follow:
(1) Seri Pulai Estate
Upgrading staff quarters amounted RMXX,XXX.XX
<ul> <li>Supply and delivery units of steel cabinet for workers amounted RMX,XXX.XX</li> </ul>
New machine Kubota amounted RMXXX,XXX.XX (2) Kulai Estate
<ul> <li>Rapid IT System for accident reporting, OSH programme and alert on expiring dates for permit and licence amount RM XX,XXX.XX</li> </ul>
Utilize available CANTAS to expedite pruning work amount XX,XXX.XX

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		<ul> <li>(3) CEP Rengam Estate</li> <li>Replacement of Kitchen Door for workers quarters amount RM XX,XXX.XX</li> <li>Installation of solar lamp amount RM XX,XXX.XX</li> <li>(4) Layang Estate</li> <li>Repair broken and collapse Drain at workers quarters amount RM XX,XXX.XX</li> </ul>	
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.	<ul> <li>The Certification Unit has completely its RSPO metrics template version</li> <li>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:</li> <li>SAP accounting system</li> <li>Land titles</li> <li>Complaints &amp; grievance records</li> <li>Dept. of Safety &amp; Health's JKKP8 form</li> </ul>	Complied
Criterio	n 3.3: Operating procedures are Appropriately documented, consistently	/ implemented and monitored.	
3.3.1	<ul> <li>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</li> <li>Critical (Major) compliance -</li> </ul>	Standard Operating Procedures (SOPs) for the estate and mill has been established. Sime Darby SOP issued dated 02/01/2008 and Agricultural Reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU 24 as a guidance document to conduct estate operation. The estate also holds the Safety Work Procedure and Sime Darby Agricultural Reference Manual – Oil Palm Planting issued No.2, June 2021. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc. Palm Oil Mill holds two SOPs: Standard Operating Procedure for palm oil mills Version 2 dated 1st January 2019. and Mill Quality Management System version 1 dated 1/11/2008 as a guidance document to operate the mill.	Complied

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		For Health, Safety and Environment, both mill and estates, Sime Darby has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. Sime Darby continuously updated the SOP established. Among the updated SOP as follows:	
		<ol> <li>UM HSE Management System Manual, UM/HSE/MS/01</li> <li>First Aid in Workplace Procedure, UM/HSE/OCP/01</li> <li>Safety Harvesting Procedure, UM/HSE/OCP/02</li> </ol>	
		<ul> <li>(4) Personal Protective Equipment Procedure, UM/HSE/OCP/03</li> <li>(5) Chemical Safety Management Procedure, UM/HSE/OCP/04</li> <li>(6) Permit to Work (PTW) Procedure, UM/HSE/OCP/05</li> <li>(7) OSH Risk Management Procedure, UM/HSE/SE/01</li> </ul>	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	A mechanism on checking the consistency of estate and mill implementation of their procedures were in place. Among the mechanism such as Internal Audits by Group Sustainability Department, Workplace Inspection, and usage of checklists by the management of the operation units.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<ul> <li>The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit. Reviewed the monitoring records as follows:</li> <li>(1) <u>Hadapan Palm Oil Mill</u> <ul> <li>Internal Audit Report: 19/09/2023</li> <li>Structured Oil Recovery Assessment (SORA): 14-18/08/2023</li> </ul> </li> <li>(2) <u>Seri Pulai Estate</u> <ul> <li>Performance Monitoring Visit Report dated 22/08/2023</li> <li>Internal Audit Report dated 18/09/2023</li> <li>Structured Crop Recovery Assessment Report (SCRA), Mature Upkeep Assessment (MUA) report dated 14-18/08/2023</li> </ul> </li> </ul>	Complied

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1			
		(3) <u>Kulai Estate</u>	
		Performance Monitoring Visit Report dated 25/10/2023	
		Internal Audit Report dated 20/09/2023	
		• Structured Crop Recovery Assessment Report (SCRA), Mature Upkeep Assessment (MUA) report dated 21/08/2023	
		(4) Layang Estate	
		Performance Monitoring Visit Report dated 21/08/2023	
		Internal Audit Report dated 21/09/2023	
		• Structured Crop Recovery Assessment Report (SCRA), Mature Upkeep Assessment (MUA) report dated 21/08/2023	
		(5) <u>CEP Rengam Estate</u>	
		Performance Monitoring Visit Report dated 26/09/2023	
		Internal Audit Report dated 22/09/2023	
		• Structured Crop Recovery Assessment Report (SCRA), Mature Upkeep Assessment (MUA) report dated 14-18/08/2023	
	<b>5. 3.4:</b> A comprehensive Social and Environmental Impact Assessment (Sment and monitoring plan is implemented and regularly updated in ongoing the second	SEIA) is undertaken prior to new plantings or operations, and a social and ing operations.	environmental
3.4.1	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	No additional methods have been implemented or introduced in the operations of the mill and estate, which could potentially result in altered impacts on the social and environmental aspects. The social and environmental impacts arising from the mill and estate operations have remained consistent. Furthermore, there have been no new operations at the mill and no new planting activities conducted at each estate of the SOU 24 – Hadapan Palm Oil Mill & Supply Bases. However, each operating unit has diligently performed their Social Impact Assessment (SIA) and Environmental Impacts Assessment (EIA). Detailed information regarding these assessments can be found in Indicator 3.4.2, provided below.	Complied

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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. - Minor Compliance -	Social impact assessment has been done for SOU 24 – Hadapan Palm Oil Mill & Supply Bases which has been conducted on 03/02- 07/02/2014 which has been done by Group Sustainability Department. The assessment has been conducted in different methods which are through rational mechanism for assessing impact and consultation with stakeholders which are incorporate with operating units under SOU 24 – Hadapan Palm Oil Mill & Supply Bases. Stakeholder that has been consulted can be sighted in the attendance records.	Complied
		The findings of the assessment have been classified into 5 different category which are good practices/findings, issues, complaints suggestion and other finding by stakeholders. Among the issues identified are:	
		Seri Pulai Estate	
		(1) Inconsistent operating hours for grocery store.	
		(2) Lack of understanding on the salary calculation mostly for loose collector gang for those recruited less than 1 year.	
		Kulai Estate	
		(1) There is some concern raised from local workers regards to workers quarters arrangement where the preferred to be clustered in one place without mixing with foreign workers to avoid any social cases.	
		(2) Some workers suggested fogging to be done in regular basis which the workers is having problem with mosquitoes at the workers housing.	
		CEP Renggam	
		(1) Request by workers to prolong the duration of water supply which currently only 1pm-5pm	
		(2) Complaint by on workers on high rate of electricity despite of the subsidy and normal usage.	

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has been ve	plan has been established by each operating units and erified by the auditor. There is evidence that the plan has been developed in participatory ways with the	
	ent operating hours for grocery store.	
Managem grocery st	ent plan: The management will discuss the owner of the tore and workers can find alternative to go for grocery earby village.	
	nderstanding on the salary calculation mostly for loose gang for those recruited less than 1 year.	
-	ent plan: Continuous briefing on the salary calculation for the newly recruited workers.	
Kulai Estate		
workers q	some concern raised from local workers regards to uarters arrangement where the preferred to be clustered ace without mixing with foreign workers to avoid any es.	
reallocate	ent plan: The management has taken initiative to try to the workers, however there is some workers is reluctant r. Communication will be done on the initiative that has n.	
	kers suggested fogging to be done in regular basis which ers are having problem with mosquitoes at the workers	
	ent plan: The management will only do the fogging on estimation is deem necessary.	
CEP Renggam		
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<ul> <li>Request by workers to prolong the duration of water supply which currently only 1pm-5pm</li> </ul>
Management plan: Request will be taken as consideration and the management will look into the capacity of water and labour force.
(2) Complaint by on workers on high rate of electricity despite of the subsidy and normal usage.
Management plan: The management will look into the issues and will convert it into the domestic used and ensure monitoring of the electricity will be done on monthly basis.
Environmental Impact Assessment has been established for Estates and Mill. Refer Environmental Impact Evaluation and Environmental Impact Assessment Forms SOU 24 Year 2023. Legal reference used were:
<ul> <li>Occupational Safety and Health (Noise Exposure) Regulation 2019</li> </ul>
<ul> <li>Environmental Quality (Clean Air) Regulation 2014</li> </ul>
Environmental Quality (Schedule waste) Regulation 2005
The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records:
<ul> <li>Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, (version 1; year 2008 Issue no. 1; dated 1 April 2009 Register)</li> </ul>
<ul> <li>Appendix 5.4.1c - Environmental Aspect and Impact Identification form (version 1; year 2008 Issue no. 1; dated 1 April 2009; MR- 01/EIA)</li> </ul>
<ul> <li>Appendix 5.4.1d – Environmental Impacts Evaluation form (version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE)</li> </ul>

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number EAI/2022/28-1 with serial number EIE/ been made on 12/04/ Pesticide and chemical scheduled wastes for e Laboratory for the mill. The management alrea plan for Mill / Estate b	pect and Impact Identification Form with serial 0 and Environmental Impact Evaluation Form 2008/10-28(7). Reviewed on EAI and EIE has 2023. Among the activities discussed were spraying, fertilizer application, diesel usage, states, and POME, EFB, Boiler, Sterilizer, and adv establish the environmental management ase on EIA and EIE and also department of thent ( <i>Jadual Pematuhan</i> ). The plan for elow:
Improvement issue	Action Plan
Waste reduction	To properly manage all usage of oil with proper tracking
	Improve / rectify all the leaking hydraulic oil and lubricant oil at machinery
	To open bolt, nut, and use back during maintenance work rather than cut the bolt and nut using oxy cutting.
Mill Operation	Reduce Gap between thresher rings from 4 inch to 2 inch in order to reduce quantity of spikelet carry over to press
	Change transmission chain duplex chain pitch over to press

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			Implement 3D Trasar for control blowdown and chemical usage based on boiler water quantity	
		People	Implement total productive maintenance and 5s activity in every station	
			Mill give support if worker need to do festival event	
			Mill management provide grievances platform for workers to complaint if any	
		Planet	Locate proper oil trap to avoid the chemical go into monsoon drain	
			Store schedule waste at specific area that mill have prepared for it	
			Manage schedule waste that should be disposed by the authorized contactor for every 6 months	
3.4.3	<b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		to monitor the performance of the established update the plan in participatory way.	Complied
	- Critical (Major) compliance -	highlighted in the socia has been established review. It has been fur	ere is evidence that all issues that has been l impact assessment and management plan that has been implemented based on document ther confirmed through interview with affected e are no repeating same issues for issues that in the assessment.	
		Hadapan Palm Oil Mill	Estate, Layang Estate, CEP Rengam Estate and has established Environment Management Plan g of the plan has been developed with	

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Criterio	<b>n 3.5:</b> A system for managing human resources is in place.	participation of affected stakeholders. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan.	
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 -	Each OU within the SOU 24 - Hadapan Palm Oil Mill and Supply Bases is adhering to the Hiring of Local Workers Procedure (revised in 2020), as well as the Migrant Worker Responsible Recruitment Procedure (revised on 20/08/2021). Both of these procedures have been put in place by the management of SDP. These procedures meticulously outline the recruitment processes for both local and foreign workers, ensuring that all hiring practices are conducted in accordance with established guidelines and ethical standards. The guideline for the recruitment of local workers in the year 2020 delineates the recruitment process into two phases: pre-recruitment and post-recruitment. During pre-recruitment, vacant positions in the operating units are identified by management. Interested parties submit applications, which are then screened and shortlisted. During interviews, assistant managers provide briefings about job roles, tasks, and expectations. Successful applications are approved by managers and proceed to the medical examination stage. Post-recruitment involves successful candidates undergoing medical check-ups before being issued offer letters. They then sign employment contracts, undergo induction and on-the-job training before commencing work For migrant workers, recruitment procedures are outlined in the Migrant Worker Recruitment Procedure of 2021. The recruitment of foreign workers is handled by the headquarters through appointed agents in respective countries	Complied

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3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	<ul> <li>Procedure Career Progression for Workers Level (SDP/HRUM/2020/SOP01 Date: 01/01/2020) was established for the promotion procedure. The detail as below</li> <li>General Worker/Harvester to Mandore Level</li> <li>Mandore to Supervisor Level</li> <li>Staff career progression is determined by Key Performance Indicators (KPIs) and years of experience.</li> <li>Sample of 12 newly recruited workers in year 2023 has been taken by auditor for verification which include workers from different origin countries, gender and races. It has been verified that the recruitment procedure has been implemented and all records has been maintained.</li> <li>For local workers, verified job application form, records for interview, medical check-up records and offer letter. While for foreign workers, records verified is medical check-up (FOMEMA), and offer letter.</li> <li>As per interview with workers, it has been confirmed that the recruitment process is in line with the procedure.</li> </ul>	Complied
Criterio	<b>n 3.6:</b> An occupational health and safety (H&S) plan is documented, eff	and has been confirmed through interview, document review.	
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	<ul> <li>Each Operating Unit of SOU 24 – Hadapan Palm Oil Mill &amp; Supply Bases is adopting OSH Risk Management Procedure (UM/HSE/SP/01, dated 09/03/2021). The objectives of this procedures are to:</li> <li>(1) To define the requirements for management of safety and health related risks within Upstream Malaysia</li> <li>(2) To ensure that all safety and health risks, inherent or residual, are effectively managed.</li> </ul>	OFI
		(3) To set the standards in developing HIRARC in estates and mills	

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(4) To identify all the hazards in the workplace
(5) To assess the risks of respective hazards and formulate control measure to mitigate them
(6) To set the objective, target, HSE programs and generating safe work procedures (if not available, absent or not adequate) for all work activities from the output of risk activities
(7) To create a safe working environment for workers
Hadapan Palm Oil Mill:
Hazard Identification, Risk Assessment and Risk Control (HIRARC): Hazards and risks include all work activities, use of machinery/non- machinery, all staff and employees, contract workers, visitors, people dealing with the project, and people on the SDP premises.
Evident from the HIRARC established that the POM management adequately assessed the HIRARC. Risk assessment (HIRARC) carried out on all operations, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, chemicals, accident, fire, fuel spillage, working at heights, working in confined space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc. and "permit to work system" for the mill. Verified that additional HIRARC reviews also made by the Safety & Health team upon occurrence of incidences or accidents. The latest review was done on 03-Jan-2023 for the mill. Sample for list register for HIRARC had been verified for activity at loading ramp, sterilizer, oil room, boiler, workshop, store area, etc.
Chemical Health Risk Assessment (CHRA) was conducted by HQ/15/ASS/00/363 on 07/06/2023. Referred to report (Ref. No. HQ/15/ASS/00/363-2023-060) dated 18/09/2023 stated that nine (9)

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(Operator), Bo Lab Analyst, a (Laboratory Ar Plant (Operat Lubricant Stor Assistant). Fro conducted w recommendation by the manage Local Exhaust HQ/16/JHII/00 21/09/2023 (F Exhaust Ventil 2 System at lal observed by th the LEV system There also com Pxxx Exxxxx (	iler (Laboratory San nd Lab Sampler), E nalyst), Workshop ( or), Production S es (Supervisor), an m the site visit, do th sampled work ons by the assessor ment. : Ventilation (LEV /112 on 20/06/202 tef. No. HQ/16/JHI ation System monito poratory area. Every he assessor and fro n was found to be sa ducted chemical ex M) Sdn Bhd. The p	and assessed were oplers), Mill Laborato ffluent Treatment Pl Fitters, Helpers), Wa ampling (Operator), d Scheduled Waster ocumentation review kers it is confirm have been implemen ) Inspection was 3. Referred to repo I/00/112-23(09)) the oring was done for F single part of this sy m the finding and da atisfactory with half so posure monitoring or parameter monitored e record as per below	ry (Supervisor, ant Laboratory ater Treatment , Chemical & s Store (QA & and interview hed that the ted accordingly conducted by ort received on e annual Local fume Hood 1 & rstem had been ata calculation, sash open. h 11/1/2022 by on n-Hexane,	
Monitoring Parameter	Exposure Limit (mg/m <sup>3</sup> )	PEL, TWA-8 hours (mg/m <sup>3</sup> )	Remarks	
n-Hexane	1.17	176	Complied	
Manganese	0.2	0.6	Complied	
Referred rep 09/11/2020 sta Oil Clarificatior	ort (Ref. No. ated that work unit a Operator, Engine F	conducted by HQ/10 HQ/LPROYKPEB/21/0 ssessed were Kernel coom Personnel, Ster ator, Workshop P	00314) dated Plant Operator, ilizer Operator,	

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Thresher Operator. The assessment for all personnel carried out show that the values are above daily noise exposure limit (DNEL) except Boilerman and Engine Room personnel. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management.	
Seri Pulai Estate:	
Hazard Identification, Risk Assessment and Risk Control (HIRARC): Hazards and risks include all work activities, use of machinery/non- machinery, all staff and employees, contract workers, visitors, people dealing with the project, and people on the SDP premises.	
Risk assessment (HIRARC) carried out on all operations, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/ chemicals, accident, fire, fuel spillage, working at heights, working in confined space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc.	
Evident from the HIRARC established that the estate management adequately assessed the HIRARC. Verified that additional HIRARC reviews also made by the Safety & Health team upon occurrence of incidences or accidents. The latest review was done in Jun-2023. Sample for list register for HIRARC had been verified for activity at workshop, store area, land irrigation, P&D, pruning, spraying, tractor driving, buffer zone, harvesting.	
Chemical Health Risk Assessment (CHRA) was conducted by HQ/16/ASS/00/26 on 17-May-2023. Referred to the CHRA Report (Ref. No. 23/2023), 17 work units were assessed i.e., chemical premix, manual spraying, mechanical spraying, manual manuring, mechanical manuring, nursery manuring and spraying, drone spraying (immature),	

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drone spraying (nursery), manual rat bait, mechanical rat bait, trunk injection, foreman, storekeeper, scheduled wastes, vehicles driver, water treatment plant, fogging. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management. Noise Risk Assessment (NRA) was conducted by HQ/16/PEB/00/ 158 on 20-Jul-2020. NRA Report (Ref. No. HQ/LPROYKPEB/20/ 00155) concluded that the value was above daily noise exposure limit (DNEL) - MB/FM3/FM oryct driver, tractor driver, Zenoah blower operator, and hasvana cantas operator. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management. An Audiometric Test was conducted by HQ/09/PEB/00/67 on 02/06/2023, involving 20 employees. The results indicated that three employees were diagnosed with Noise-Induced Hearing Loss (NIHL). Subsequently, these individuals were brought to a VMO (Visiting Medical Officer) who is also an Occupational Health Doctor (OHD) on 10/08/2023. Upon assessment, all three employees were recommended to repeat the annual audiometric test. Additionally, it was advised that they use Personal Hearing Protection (PHP) when working in noisy environments. Continuous training on proper hearing protection measures was also recommended to mitigate the risk of further hearing impairment. Kulai Estate: Hazard Identification, Risk Assessment and Risk Control (HIRARC): Hazards and risks include all work activities, use of machinery/nonmachinery, all staff and employees, contract workers, visitors, people dealing with the project, and people on the SDP premises.

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Risk assessment (HIRARC) carried out on all operations, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/ chemicals, accident, fire, fuel spillage, working at heights, working in confined space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc.	
Evident from the HIRARC established that the estate management adequately assessed the HIRARC. Verified that additional HIRARC reviews also made by the Safety & Health team upon occurrence of incidences or accidents. The latest review was done in Jun-2023. Sample for list register for HIRARC had been verified for activity at workshop, store area, land irrigation, P&D, pruning, spraying, tractor driving, buffer zone, harvesting.	
Chemical Health Risk Assessment (CHRA) was conducted by HQ/16/ASS/00/26 on 18/05/2023. Referred to the CHRA Report (Ref. No. 17/2023), 13 work units were assessed – chemical premix operator, manual spraying operator, mechanical spraying operator, manual manuring operator, mechanical manuring operator, manual rat bait operator, mechanical rat bait operator, trunk injection operator, foreman assistant, storekeeper, scheduled wastes handler, vehicle driver, water treatment plant operator. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management.	
Noise Risk Assessment (NRA) was conducted by HQ/16/PEB/00/ 158 on 24/08/2020. NRA Report (Ref. No. HQ/LPROYKPEB/ 21/00305) concluded that the values were above daily noise exposure limit (DNEL) for workshop foreman, tractor driver, badang/MB driver, Zenoah blower operator, and knapsack grass cutter operator. Additional NRA was conducted by HQ/16/PEB/00/ 158 on 12/07/2023.	

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NRA Report (Ref. No. NRA/KULAI/ADD/07-23/3) concluded that the values were above daily noise exposure limit (DNEL) for ASP operator, terrace manuring operator, and HFL operator while ASP and racker operator exceed maximum level. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management.	
<u>CEP Renggam:</u> Hazard Identification, Risk Assessment and Risk Control (HIRARC): Hazards and risks include all work activities, use of machinery/non- machinery, all staff and employees, contract workers, visitors, people dealing with the project, and people on the SDP premises.	
Risk assessment (HIRARC) carried out on all operations, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/ chemicals, accident, fire, fuel spillage, working at heights, working in confined space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc.	
Evident from the HIRARC established that the estate management adequately assessed the HIRARC. Verified that additional HIRARC reviews also made by the Safety & Health team upon occurrence of incidences or accidents. The latest review was done in Jun-2023. Sample for list register for HIRARC had been verified for activity at workshop, store area, land irrigation, P&D, pruning, spraying, tractor driving, buffer zone, harvesting.	
Chemical Health Risk Assessment (CHRA) was conducted by HQ/16/ASS/00/26 on 19/05/2023. Referred to CHRA Report (Ref. No. 24/2023) received on 01/12/2023, 16 work unit were assessed i.e., chemical premix operator, manual spraying operator (immature),	

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mechanical spraying operator, manual manuring operator, mechanical manuring operator, nursery spraying operator, manual manuring operator (nursery), drone spraying operator (immature), drone spraying operator (nursery), manual rat bait operator, mechanical rat bait operator, trunk injection operator, foreman assistant, vehicle drivers, storekeeper, fogging operator. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management. Noise Risk Assessment (NRA) was conducted by HQ/16/PEB/00/ 146 on 24/08/2020. Referred to report (Ref. No. HO/LPROYKPEB/ 21/00316) dated 03/10/2020 concluded that the value were above daily noise exposure limit (DNEL) – MTG driver, tractor driver, Zenoah blower operator, fertilizer spreader operator, foreman, hasvana cantas operator. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management. Audiometry Test was conducted by HQ/08/DOC/00/468 on 27 June 2023 for 26 workers. 18 workers normal and 8 workers Abnormal Audiogram – all abnormal cases were referred to the OHD for further examination. All proper steps for these abnormal cases were taken by the OHD such as retest within 3 months, examination by OHD and report to JKKP accordingly. Lavang Estate: Hazard Identification, Risk Assessment and Risk Control (HIRARC): Hazards and risks include all work activities, use of machinery/nonmachinery, all staff and employees, contract workers, visitors, people dealing with the project, and people on the SDP premises.

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Risk assessment (HIRARC) carried out on all operations, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/ chemicals, accident, fire, fuel spillage, working at heights, working in confined space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc.
Evident from the HIRARC established that the estate management adequately assessed the HIRARC. Verified that additional HIRARC reviews also made by the Safety & Health team upon occurrence of incidences or accidents. The latest review was done in Jun-2023. Sample for list register for HIRARC had been verified for activity at workshop, store area, land irrigation, P&D, pruning, spraying, tractor driving, buffer zone, harvesting.
Chemical Health Risk Assessment (CHRA) was conducted by HQ/16/ASS/00/26 on 18/05/2023. Referred to report (Ref. No. 19/2023) received on 02/12/2023, 11 work units were assessed – chemical premix operator, manual spraying operator, mechanical spraying operator, manual manuring operator, mechanical manuring operator, drone spraying operator work (immature); manual rat bait operator, mechanical rat bait operator, foreman assistant, storekeeper, vehicle driver. From the site visit, documentation review and interview conducted with sampled workers it is confirmed that the recommendations by the assessor have been implemented accordingly by the management.
Noise Risk Assessment (NRA) was conducted by HQ/16/PEB/00/ 158 on 25/08/2023. Referred to report (Ref. No. HQ/LPROYKPEB/ 20/00) dated 25/09/2023 concluded that the values were above daily noise exposure limit (DNEL) for tractor driver, Zenoah blower operator, and knapsack grass cutter operator. From the site visit, documentation review and interview conducted with sampled workers it is confirmed

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that the recommendations by the assessor have been implemented accordingly by the management. Audiometry Test was conducted by HQ/08/DOC/00/468 on 12/09/2023 for 15 workers. 8 normal audiogram, and 7 workers Abnormal Audiogram – all abnormal cases was referred to the OHD for further examination. All proper steps for these abnormal cases were taken by the OHD such as retest within 3 months, examination by OHD and report to JKKP accordingly.

#### OFI #2435775-202312-I1:

(1) Location: Hadapan Palm Oil Mill & audited estate An official letter titled 'Tender to Quote Chemical Exposure Monitoring for Southern Region, Johor' was sighted, issued by the Regional Chief Executive Officer on 06/12/2023. The letter invites JKKP-approved assessors to submit tenders. A tender briefing was conducted on 08/12/2023 with interested JKKP-approved assessors, and the submission period is open until 15/12/2023. The progress of the Chemical Exposure Monitoring for Southern Region, Johor, will be followed up during the next assessment. (2) Location: Kulai Estate The Audiometric Test, conducted by HQ/15/DOC/00/ 395 on 28/10/2023, involved 25 workers. Out of these, 7 workers exhibited abnormal audiograms, indicating hearing loss (HL), hearing impairment (HI), or permanent standard threshold shift (PSTS). However, only 2 workers are required to undergo a Medical Examination, and retests for 4 workers are pending. Appointments have been scheduled with OHD on 14/12/2023. This will be further followed up during the next assessment.

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		1	
3.6.2	<ul> <li>(C) The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</li> <li>- Critical (Major) compliance -</li> </ul>	ESH Management Plan 2023 – prepared by Assistant Manager and approved by Estate Manager. Consist: OSH Policy (briefing), Safety & Health Committee (committee member, meeting, workplace inspection, accident review), legal register (JKKP permit renewal), Risk management (HIRARC review, training, etc.), emergency preparedness and Response & Accident (fire extinguisher internal inspection, first aid kit internal inspection, first aider training, investigation team training, LTI Notice Board update, JKKP 8 report, accident statistic update, emergency route, fire equipment, and first aid kit layout update and establishment, fire drill activities), chemical management (CHRA recommendation implementation, update chemical register, SDS training, medical surveillance for chemical handlers), waste management (SW disposal), PPE management (distribution and training), and OSH training. The OSH Policy was observed to be clearly displayed at prominent locations within the mill and estate. Adequate posters, regulations, and newsletters were prominently exhibited on notice boards. During interviews, workers demonstrated a commendable level of awareness regarding occupational safety and health. Programmes aimed at protecting the health and safety of workers were satisfactorily implemented.	Complied
Criterio	n 3.7: All staff, workers, Scheme Smallholders, out-growers, and contra	ct workers are appropriately trained.	
3.7.1	<b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, 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. - Critical (Major) compliance -	The training programs are systematically documented in the training matrix of the operating units on an annual basis. This matrix serves as a comprehensive reference, containing information about the subjects of training and the scheduled timing for each session. The training topics encompass a broad spectrum, covering subjects related to best practices, Occupational Health and Safety (OHS), environmental considerations, and social aspects. Additionally, the training matrix is designed to take into account gender-specific needs, ensuring a well-	OFI

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	rounded and inclusive approach to employee development and compliance with relevant standards and practices. OFI # 2435775-202312-I2: Location: CEP Renggam Estate To further enhance the capabilities of the NEST caretakers, the management could explore possibilities and requirements related to the early education course ( <i>Kursus Asuhan</i> <i>PERMATA</i> ) under <i>Jabatan Kebajikan Masyarakat</i> (JKM).	
Records of training are maintained. - Minor Compliance -	<ul> <li>The mill and all estates maintain detailed records of various training sessions, as evidenced by the following samples:</li> <li>(1) Hadapan Palm Oil Mill: <ul> <li>Environment, Safety, and Health Policy - 22 August 2023</li> <li>Wages and Payslip Awareness - 16 June 2023</li> <li>Medical Access &amp; Freedom of Movement - 10 May 2023</li> <li>PPE Awareness - 08 May 2023</li> <li>Grievance Channel Awareness - 11 May and 05 July 2023</li> <li>First Aid Training - 04 September 2023</li> <li>Fire Fighting and Emergency Respond Plan - 04 and 18 September 2023</li> <li>Chemical Handling - 17 May 2023</li> </ul> </li> <li>(2) Seri Pulai Estate: <ul> <li>Fire Drill - 08/12/2023</li> <li>Chemical Handling - 20/06/2023</li> <li>First Aid - 31/05/2023</li> <li>Chemical &amp; Spraying - 17/03/2023</li> </ul> </li> </ul>	Complied

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Human Right & Reproductive Rights Policy - 10/03/2023
<ul> <li>Understanding of Group Policy &amp; Authority &amp; Whistleblowing - 09/03/2023</li> </ul>
• Fire Fighting - 27/02/2023
(3) Kulai Estate:
Waste Management - 11/12/2023
Trunk Injection - 09/12/2023
Chemical Handling - 09/12/2023
• Fire Fighting - 08/12/2023
<ul> <li>PPE Management - 18/10/2023</li> </ul>
<ul> <li>PPE, Payslip, and Safety Requirement for Contractor - 03/10/2023</li> </ul>
<ul> <li>Awareness on RTE species and HCV - 11/10/2023</li> </ul>
<ul> <li>Mental Health - 19/10/2023</li> </ul>
• FFB Quality - 27/09/2023
• First Aid - 25/08/2023
(4) CEP Renggam Estate:
Waste Management - 17/08/2023
ERP & Lighting Awareness - 24/08/2023
Tractor Driver SOP - 30/11/2023
<ul> <li>EPF &amp; SOCSO Contribution for Contractors' Workers - 29/09/2023</li> </ul>
<ul> <li>Sexual Awareness - 19/04/2023</li> </ul>
<ul> <li>Workshop for gender representative - 13/07/2023</li> </ul>
<ul> <li>First Aid Kit - 01/02/2023</li> </ul>
• Fire Drill - 08/09/2023

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		<ul> <li>(5) Layang Estate:</li> <li>Emergency Response - 04/09/2023</li> <li>FFB Harvesting - 22/08/2023</li> <li>Weed Management - 19/07/2023</li> <li>HCV &amp; RTE Awareness - 18/07/2023</li> <li>Forced Labour Prevention Validation - 11/07/2023</li> <li>First Aid - 05/06/2023</li> <li>OPP Usage Awareness - 18/05/2023</li> <li>PPE SOP - 18/05/2023</li> <li>Sexual Harassment Awareness - 17/04/2023</li> <li>Fertilizer Application SOP - 13/03/2023</li> </ul> These records illustrate a diverse range of training topics addressing environmental, safety, health, social, and gender-specific aspects,	
3.7.3	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. - Minor Compliance -	demonstrating a comprehensive approach to employee development and compliance. Training conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by Regional Sustainability & Quality Management (RSQM) personnel, attended Hadapan Mill Manager, Assistant Mill Manager, Lab Supervisor, Lab Despatch Operator, Weighbridge Clerk, Grader and Auxiliary Police. Refer Training record dated 07/02/2023 and 15/09/2023.	Complied
	<b>on 3.8</b> : Supply chain requirement for mills Il supply chain requirements are considered as <b>Critical (C)</b> . However, it w	vill not contribute to suspension if there is more than 5 non-compliance w	ithin a principle)
3.8.1	Identity Preserved Module 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	It was verified that POM processes certified and uncertified FFB without physically separating them. Therefore, this indicator is not applicable to the UoC.	Not Applicable

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	the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.		
	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.		
3.8.2	Mass Balance Module 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.	Hadapan Palm Oil Mill is deemed to be Mass Balance (MB), where the mill processes Fresh Fruit Bunches (FFB) from both RSPO-certified sources and uncertified plantations/estates (OCPs). The RSPO-certified sources include owned supply bases such as Kulai Estate, Layang Estate, Seri Pulai Estate, and CEP Rengam Estate, as well as SDP-owned estates including Bukit Badak Estate, Pekan Estate, Sembrong Estate, Tun Dr. Ismail Estate, Ulu Remis Estate, Bukit Benut Estate, Cenas Estate, and Lambak Elaeis Estate.	Complied
		As of the latest Mass Balance Sheet, maintained and updated by the mill management in Nov 2023, it has been verified that the mill only claims the volume of oil palm products produced from the processing of certified FFB as MB.	
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	The POM provides and submits the recorded estimated tonnage of Crude Palm Oil (CPO) and Palm Kernel (PK) products that could potentially be produced. This data undergoes thorough verification during this ASA 2_3.	Complied
	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 aforementioned figure signifies the overall volume of certified palm oil products (CPO and PK) permitted for delivery by the certified mill within a year.	
		The actual tonnage produced is documented and included in each audit report.	

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		See also Table 10. Summary of Certified Tonnage (MT)	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Based on the verification via RSPO PalmTrace, it is confirmed that the mill met all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Complied
		The registration of RSPO PalmTrace is done by the Sime Darby's Global Trade Marketing Department. The mill has successfully registered in the PalmTrace system as details below:	
		License ID: CB145339 (Active)	
		Member Name: Strategic Operating Unit (SOU 24) – Hadapan Palm Oil Mill	
		• Member ID: RSPO_PO100000301	
		RSPO Membership Number: 1-0008-04-000-00 (Sime Darby Plantation Berhad)	
		Type of Business: Oil mill	
3.8.5	Documented procedures The mill shall have written procedures and/or work instructions or	Documented Procedures were made available for verification and the requirements have been adhered to as follows:	Complied
e a	The first share have write it proceedings and of work instructions of	a) Refer Sustainable Supply chain and Traceability Procedure dated 01/06/2022 with reference number SD/SDP/GSD/SCCS/ 0522/01.	
	<ul><li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li></ul>	<ul> <li>b) Complete and up to date records and reports in relation to RSPO SCCS were maintained and available for verification. Among the records available were Mass Balance Sheet, Internal Audit Reports,</li> </ul>	
	b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including	and SCCS Training records.	
	training records).	c) Mill have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated	
	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.	in Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 4.0 Responsibilities. Stated "The Head of	

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	<ul><li>This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</li><li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li></ul>	<ul><li>operating unit shall have the overall responsibility for the implementation of this SOP."</li><li>d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 7.0 Receiving FFB at the Mill.</li></ul>	
3.8.6	<ul> <li>Internal Audit <ol> <li>The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</li> <li>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>Effectively implements and maintains the standard requirements within its organisation.</li> </ol> </li> <li>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.</li> </ul>	The procedure to conduct annual internal audit is addressed in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022. Refer section 18.0 Internal Audit. Refer latest SCCS Internal Audit dated 19/09/2023. Based on the internal audit report and checklist, the elements of RSPO supply chain were adequately covered including the RSPO Market Communications and Claims elements. There was 2 non-conformities raised from the internal audit. For non-conformity raised, corrective action has been established to rectify the lapse found and sent on 27/09/2023. The status of the non-conformity shall also be discussed in the management review meeting. The corrective action has been conducted and closed on 19/10/2023.	Complied
3.8.7	<ul> <li>Purchasing and Goods In</li> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	The accompanying documents of incoming FFB from own estate are estate's weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number. Samples as below: <u>Owned supply bases:</u> (1) Kulai Estate:	Complied

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	1
-	
• Date: 30/11/2023	
RSPO Cert No: RSPO 739013	
<ul> <li>Mill's Weighbridge Ticket No.: 262709</li> </ul>	
<ul> <li>Mill's Weighbridge Ticket Date: 30/11/2023</li> </ul>	
Net Weight: 12,450 kg	
(2) Layang Estate:	
FFB Consignment Note No.: 3545	
• Date: 30/11/2023	
RSPO Cert No: RSPO 739013	
Mill's Weighbridge Ticket No.: 262706	
Mill's Weighbridge Ticket Date: 30/11/2023	
Net Weight: 2,450 kg	
(3) Seri Pulai Estate:	
FFB Consignment Note No.: 24027	
• Date: 30/11/2023	
RSPO Cert No: RSPO 739013	
<ul> <li>Mill's Weighbridge Ticket No.: 262702</li> </ul>	
<ul> <li>Mill's Weighbridge Ticket Date: 30/11/2023</li> </ul>	
Net Weight: 11,270 kg	
(4) CEP Rengam Estate:	
FFB Consignment Note No.: 62846	
• Date: 30/11/2023	
RSPO Cert No: RSPO 739013	
Mill's Weighbridge Ticket No.: 262721	
	<ul> <li>Date: 30/11/2023</li> <li>RSPO Cert No: RSPO 739013</li> <li>Mill's Weighbridge Ticket No.: 262709</li> <li>Mill's Weighbridge Ticket Date: 30/11/2023</li> <li>Net Weight: 12,450 kg</li> <li>(2) Layang Estate: <ul> <li>FFB Consignment Note No.: 3545</li> <li>Date: 30/11/2023</li> <li>RSPO Cert No: RSPO 739013</li> <li>Mill's Weighbridge Ticket No.: 262706</li> <li>Mill's Weighbridge Ticket Date: 30/11/2023</li> <li>Net Weight: 2,450 kg</li> </ul> </li> <li>(3) Seri Pulai Estate: <ul> <li>FFB Consignment Note No.: 24027</li> <li>Date: 30/11/2023</li> <li>RSPO Cert No: RSPO 739013</li> <li>Mill's Weighbridge Ticket No.: 262702</li> <li>Mill's Weighbridge Ticket No.: 262702</li> <li>Mill's Weighbridge Ticket No.: 262702</li> <li>Mill's Weighbridge Ticket Date: 30/11/2023</li> <li>RSPO Cert No: RSPO 739013</li> <li>Mill's Weighbridge Ticket Date: 30/11/2023</li> <li>RSPO Cert No: RSPO 739013</li> <li>Mill's Weighbridge Ticket Date: 30/11/2023</li> <li>RSPO Cert No: RSPO 739013</li> <li>Mill's Weighbridge Ticket Date: 30/11/2023</li> <li>RSPO Cert No: RSPO 739013</li> <li>Kill's Weighbridge Ticket Date: 30/11/2023</li> <li>RSPO Cert No: RSPO 739013</li> <li>Rill's Weighbridge Ticket Date: 30/11/2023</li> <li>RSPO Cert No: RSPO 739013</li> </ul> </li> </ul>

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Mill's Weighbridge Ticket Date: 30/11/2023	
Net Weight: 12,950 kg	
RSPO-certified diversion crops:	
(1) Bukit Benut Estate	
FFB Consignment Note No.: 18939	
• Date: 21/11/2023	
RSPO Cert No: RSPO 591229	
<ul> <li>Mill's Weighbridge Ticket No.: 262102</li> </ul>	
<ul> <li>Mill's Weighbridge Ticket Date: 21/11/2023</li> </ul>	
Net Weight: 12,090 kg	
(2) Lambak Elaies Estate:	
FFB Consignment Note No.: 5912	
• Date: 21/11/2023	
<ul> <li>RSPO Cert No: RSPO 591229</li> </ul>	
<ul> <li>Mill's Weighbridge Ticket No.: 262091</li> </ul>	
<ul> <li>Mill's Weighbridge Ticket Date: 21/11/2023</li> </ul>	
<ul> <li>Net Weight: 2,450 kg</li> </ul>	
(3) Bukit Badak Estate:	
FFB Consignment Note No.: 40834	
• Date: 25/11/2023	
<ul> <li>RSPO Cert No: CU-RSPO-863077</li> </ul>	
<ul> <li>Mill's Weighbridge Ticket No.: 262442</li> </ul>	
<ul> <li>Mill's Weighbridge Ticket Date: 25/11/2023</li> </ul>	
<ul> <li>Net Weight: 11,120 kg</li> </ul>	

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Non-certified crop:(1) Kelapa Sawit Tai Hwa:• FFB Consignment Note No.: 0788• Date: 18/11/2023• RSPO Cert No: -• Mill's Weighbridge Ticket No.: 261856• Mill's Weighbridge Ticket Date: 18/11/2023• Net Weight: 38,610 kg(2) Bingan Jaya:• FFB Consignment Note No.: 094932• Date: 30/01/2023• RSPO Cert No: -• Mill's Weighbridge Ticket No.: 249849• Mill's Weighbridge Ticket Date: 30/01/2023• Net Weight: 37,360 kg
<ul> <li>As for projected overproduction of certified tonnage, details as below:</li> <li>(1) Due to increased production for CSPO, CSPK, and FFB, resulting from crop diversion from SOU 23-Ulu Remis in June and September 2023, the Unit of Certification (UoC) requested an Extension of Volume, which RSPO approved on 09/10/2023, with the following details:</li> <li>Product: FFB_estates – Additional Volume: 173,351.71 MT</li> </ul>

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		<ul> <li>Product: CSPK – Additional Volume: 8,481.31 MT</li> <li>Product: CSPO – Additional Volume: 33,828.56 MT</li> <li>(2) On 15/12/2023, RSPO granted another Volume Extension request, with the following details:</li> <li>Product: FFB_estates – Additional Volume: 54,000.00 MT</li> <li>Product: CSPK – Additional Volume: 2,700.00 MT</li> <li>Product: CSPO – Additional Volume: 11,070.00 MT</li> <li>As a result, the latest RSPO-approved Certified Volume for the period of Mar 23 – Feb 24 is as follows:</li> <li>Product: FFB_estates – RSPO-approved Certified Volume: 372,881.30 MT</li> <li>Product: CSPK – RSPO-approved Certified Volume: 18,486.89 MT</li> <li>Product: CSPO – RSPO-approved Certified Volume: 73,567.88 MT</li> <li>Handling of non-conforming FFB and/or documents is addressed in the</li> </ul>	
		Sustainable Supply Chain and Traceability Procedure, version no:1 approved on May 2022 (SD/SDP/GSD/SCCS/0522/01) under 11.0 Non-Conforming Products and Document.	
3.8.8	Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation): a) The name and address of the buyer; b) The name and address of the seller;	Hadapan Palm Oil Mill has conducted sales transactions of RSPO- certified CPO and PK between Dec 2022 and November 2023. The sales and goods out documents, including sales contracts and invoices, are centralized in the company's headquarters. The mill management has taken measures to ensure that all the necessary information is available in documented form for these transactions. Below are samples of the sales and goods out documented information for RSPO- certified CPO and PK transactions conducted by Hadapan Palm Oil Mill: <u>CSPO:</u>	Complied

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c) d) e) f) g) h) i)	The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number.	b) c) d) e) f) g) h)	The name and address of the buyer: XXXX, Xxxxx Xxxxx, Xxxxx, Xxxxx The name and address of the seller: Hadapan Palm Oil Mill, Layang-layang, Johor, Malaysia; The loading or shipment / delivery date: 06/05/2023 The date on which the documents were issued:06/05/2023 RSPO certificate number: RSPO 739013 A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Crude Palm Oil (CPO) – RSPO MB The quantity of the products delivered: 41,200 kg Any related transport documentation: Contract (No. S/PSD/2305/ CPO0013C); Mill's Weighbridge Ticket (No. 023196); Transporter's Collection Note (No. 67816); MPOB L3 Form (G316001) A unique identification number: RSPO PalmTrace Shipping Announcement (Transaction ID No. TR-96c2fff4-aeee, dated 12/06/2023 – within timeline)	
		a)	<u>PK:</u> The name and address of the buyer: XXX XX XXX, Xxxxx Xxxxx, Xxxxxxx, Xxxxxxx The name and address of the seller: Hadapan Palm Oil Mill, Layang-layang, Johor, Malaysia; The loading or shipment / delivery date: 04/09/2023	

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2 9 0		<ul> <li>d) The date on which the documents were issued:04/09/2023</li> <li>e) RSPO certificate number: RSPO 739013</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Palm Kernel (PK) – RSPO MB</li> <li>g) The quantity of the products delivered: 39,910 kg</li> <li>h) Any related transport documentation: Contract (No. S/PSD/2309/ PK0035); Mill's Weighbridge Ticket (No. 023565); Transporter's Collection Note (No. 065780)</li> <li>i) A unique identification number: RSPO PalmTrace Shipping Announcement (Transaction ID No. TR-252a72f8-f4fe, dated 09/10/2023 – within timeline)</li> </ul>	Complied
3.8.9	<ul> <li>Outsourcing Activities</li> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii) The mill shall ensure the following: <ul> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill has an agreement or contract covering the outsourced process with each contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> </ul> </li> </ul>	<ul> <li>Hadapan Palm Oil Mill has established Standard Operating Procedure related Outsourcing Activities. Refer Sustainable Supply chain and Traceability Procedure dated 01/06/2022 with reference number SD/SDP/GSD/ SCCS/0522/01 Section 13.0.</li> <li>i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Hadapan Palm Oil Mill was for CPO and PK transportation.</li> <li>ii. Sighted the contract agreement between Sime Darby Plantation Berhad and contractor;</li> <li>a) Hadapan Palm Oil Mill has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB Supplier Certified. The contract agreement and details like MPOB licence were kept in the file.</li> <li>b) Refer Contract Agreement between Sime Darby Plantation Berhad and SXXX RXXXXX &amp; TXXXXXX Sdn. Bhd. – Agreement on the Transportation of Crude Palm Oil (CPO) for</li> </ul>	Complied

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	<ul> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>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.</li> </ul>	<ul> <li>Sime Darby Plantation Berhad's Peninsular Malaysia Oil Mills; Initial term: 3 years commencing from 01/11/2020 and expiring on 31/10/2023. The tendering process were in progress. Sighted evidence of email correspondence between Group Procurement Sime Darby Plantation Berhad dated 31/10/2023 stated Letter of Extension effective from 01/11/2023 until 31/10/2024.</li> <li>c) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on agreements, transporter has no ownership of transported products and owned by buyer.</li> <li>d) Stated under section 5(d)(iii), 'permit the CB appointed by the company to conduct audit on its or its sub-contractors' operations and provide access to all relevant systems, documents and records when requested by the CB.</li> </ul>	
		The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements. Refer Section 8.0 Obligation, Undertakings and Covenants of The Transporter.	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system. The independent third parties involve in Mill operation is only transportation services for CPO and PK.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There is no new contractor used for the handling of certified CPO and PK. As per stated in the procedure Section 13.5 "The Mill shall inform in advance the outsourced contractors if audit is deemed necessary by Certification Bodies (CB) and ensure that the contractors engaged provide relevant access for the CBs to their respective operations,	Complied

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		system, and any and all information, when this is announced in advance."	
3.8.12	<ul> <li>Record keeping</li> <li>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> <li>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> <li>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>iv) For Mass Balance Module, the mill: <ul> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>b) All volumes of certified CPO and PK on a real-time basis and / or three-monthly basis.</li> <li>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.</li> <li>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.</li> </ul> </li> </ul>	<ul> <li>Hadapan Palm Oil Mill has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. The sampled records, as per Indicator 3.8.7, Indicator 3.8.8, and Indicator 3.8.12, have been thoroughly examined and found to be in compliance.</li> <li>The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in SOP for Sustainability Supply Chain and Traceability Procedure (Doc. ID: SD/SDP/GSD/SCCS/ 0522/01, Ver. No. 01, dated 1st June 2022). Additionally, the retention of accounting related records, such as contracts and invoices, has met the minimum requirement of seven years, as specified in the Annual Accounting report and Stock Inventory. It has been verified that all retained records and reports conform to relevant legal and regulatory obligations, and they confirm the certified status of raw materials or products held in stock. The mill has diligently maintained records and records are securely stored in the weighbridge office.</li> <li>Hadapan Palm Oil Mill is deemed to be Mass Balance (MB), therefore, all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded on a three-monthly basis in the mill's mass balance accounting sheet. The POM has maintained a monthly summary of all FFB receipts, production tonnage, and dispatch of CPO and PK. This inventory is reconciled every three months. Deduction and conversion ratios for the volumes of CPO and PK delivered from the Palm Oil Mill have been accurately calculated, documented, and</li> </ul>	Complied

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		recorded. Furthermore, all deliveries of MB sales originate from positive stock, ensuring proper traceability and accountability.	
3.8.13	Extraction Rate 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.	To ensure accuracy, the estimated tonnage of CPO and PK for the period of Dec 2022 to Nov 2023 has been meticulously verified. The resulting figures have been included in the public summary report. This estimation is based on the FFB received and processed by the mill within a 12-month period. The percentage mentioned in the report pertains to the mill's performance and the quality of the FFB within the preceding 12 months. As referred to Table 10. Summary of Certified Tonnage (MT), OER and KER recorded for the period of Dec 2022 to Nov 2023 are 21.99% and 5.48% respectively.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Daily OER and KER of FFB processed recorded in the daily figure report on daily basis which were based on actual measurement of production stocks. The report of production report was available and verified.	Complied
3.8.15	Processing 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.	Hadapan Palm Oil Mill is deemed to be Mass Balance (MB), where the mill processes Fresh Fruit Bunches (FFB) from both RSPO-certified sources and uncertified plantations/estates (OCPs). It was verified that POM processes certified and uncertified FFB without physically separating them. Therefore, this indicator is not applicable.	Not Applicable
3.8.16	<ul> <li>Registration of Transactions</li> <li>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</li> <li>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.</li> </ul>	<ul> <li>In order to facilitate RSPO certified transactions, the Sime Darby's Global Trade Marketing Department is responsible for conducting the necessary transactions for RSPO-certified CPO and PK through the RSPO IT Platform. During the audit, it was verified that all transactions from the mill (CSPO/CSPK) were accurately recorded and announced in accordance with the RSPO requirements. Sampling a per record below:-</li> <li>(1) RSPO PalmTrace Shipping Announcement (Transaction ID No. TR-96c2fff4-aeee, dated 12/06/2023 – not more than three months after dispatched)</li> </ul>	Complied

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3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	<ul> <li>(2) RSPO PalmTrace Shipping Announcement (Transaction ID No. TR-252a72f8-f4fe, dated 09/10/2023 – not more than three months after dispatched)</li> <li>RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace and the Remove was conducted accordingly in the RSPO IT platform.</li> <li>In accordance with the Section 12.1 of Sustainable Supply chain and Traceability Procedure (Doc. ID: SD/SDP/GSD/SCCS/ 0522/01, Ver. No. 01, dated 1st June 2022), which stated "Any claims regarding the use of or support of certified oil palm products shall comply with the rules of respective certification scheme (e.g., RSPO, MSPO). For RSPO, refer to the latest RSPO Rules on Market Communication and Claims"., it is confirmed that no evidence has been found to date of any incorrect or inappropriate claims made at this specific unit.</li> <li>It has been verified that the relevant outgoing paperwork correctly indicates the necessary information on product claims, including the applicable Supply Chain model and certificate number. Additionally, during the audit, it was confirmed that the mill does not utilize the RSPO corporate logo or trademark logo, ensuring compliance with the guidelines regarding their use.</li> </ul>	Complied
Genera	l corporate communications	guidennes regularing their user	
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	The Sime Darby Plantation has highlighted its RSPO membership and its commitment to the objectives and principles of RSPO via Sime Darby Plantation's (SDP) 2021 Sustainability Report, which stated "SDP was a founding member of the Roundtable on Sustainable Palm Oil (RSPO) in 2004. We started working towards 100% RSPO certification across our operations in 2008, making sustainable, ethically-sourced palm oil our rallying cry."	Complied

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4.2	<ul> <li>In corporate communications, a member is allowed to:</li> <li>A. display its RSPO membership status</li> <li>B. display the RSPO web address (www.rspo.org)</li> <li>C. state that the member supports the work of RSPO</li> <li>D. state the member's history with regard to RSPO</li> <li>E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership</li> </ul>	In the Sime Darby Plantation's (SDP) 2021 Sustainability Report, SDP has stated their targets and progress, i.e., 100% RSPO certified estates and mills, Support 100% scheme smallholders in Indonesia to obtain RSPO certification and Maintain RSPO certification for 100% of smallholders in PNG and Solomon Islands. Details of RSPO Trademark License of Sime Darby Plantation as below: License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 However, in the corporate communications, no usage of RSPO Trademark License.	Complied
4.3	Members are <b>not allowed</b> to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Based on the desktop studies, site visit and documentation review, it is confirmed that there is no usage of the RSPO corporate logo.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	Based on the desktop studies and documentation review, it is confirmed that there is no statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	Complied
4.5	<ul> <li>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:</li> <li>"We have been sourcing RSPO certified palm oil since (YEAR)."</li> <li>"We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year."</li> <li>"We have been RSPO certified since (YEAR)."</li> <li>"We have been RSPO certified since (YEAR)."</li> <li>"We have been RSPO certified since (YEAR)."</li> </ul>	Evident from the Sime Darby Plantation's (SDP) 2021 Sustainability Report that the management has made statements that highlight their RSPO certification status and product-related claims in their corporate communication tools which complied with the requirement of RSPO Market Communication and Claims 2020.	Complied

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			r		
	• "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified."				
	• "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits."				
	• "We are RSPO certified. Ask us for our RSPO certified products."				
4.6	<ul><li>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</li><li>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.</li></ul>	As indicated on the RSPO website ( <u>https://rspo.org/members/1-0008-04-000-00/</u> ), Sime Darby Plantation Berhad has been an RSPO member since 07 September 2004, holding RSPO Membership No. 1-0008-04-000-00. Therefore, this specific indicator is deemed Not Applicable for this UoC.	Not Applicable		
	<ul> <li>B. Claim statements are limited to the following examples:</li> <li>i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)."</li> </ul>				
	<ul> <li>X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</li> </ul>				
	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".				
Product	-specific communications				
5.1 Gen	eral				

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5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the UoC does not make on-pack claims. However, it has been noted that off-pack claim is made by the UoC through shipping documents and invoices, specifically for RSPO-certified Crude Palm Oil (CPO) and Palm Kernel (PK). Additionally, an off-pack claim is also stated in Sime Darby Plantation's (SDP) 2021 Sustainability Report.	Complied
5.1.2	Product-specific communications are voluntary.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the Product- specific communications are made voluntary by the management.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	<ul> <li>Details of RSPO Trademark License of Sime Darby Plantation as below:</li> <li>License No.: RSPO-1106024</li> <li>License Start Date: 23/06/2023</li> <li>License Expiration: 22/06/2025</li> <li>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label. Consequently, further assessment of this requirement cannot be conducted.</li> </ul>	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that there is no usage of any other trademark or label by the management.	Complied
5.1.5	<ul> <li>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below:</li> <li>RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field.</li> </ul>	As Hadapan Palm Oil Mill processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable

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	<ul> <li>Both parties shall inform their certification body in writing about the agreement.</li> <li>The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer.</li> </ul>		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain.	As Hadapan Palm Oil Mill processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable
5.2 Off	pack claims		
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the UoC does not make on-pack claims. However, it has been noted that off-pack claim is made by the UoC through shipping documents and invoices, specifically for RSPO-certified Crude Palm Oil (CPO) and Palm Kernel (PK). Additionally, an off-pack claim is also stated in Sime Darby Plantation's (SDP) 2021 Sustainability Report.	Complied
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Based on the documentation review and interviews with relevant personnel, it has been confirmed that when confirming the sale of certified palm oil products, Hadapan Palm Oil Mill has adhered to the requirements of the RSPO Supply Chain Certification Standard (SCCS). Samples as below: CSPO:	Complied

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a) The name and address of the buyer: XXXX, Xxxxx Xxxxx, Xxxxx, Xxxxx, Xxxxx
b) The name and address of the seller: Hadapan Palm Oil Mill, Layang-layang, Johor, Malaysia;
c) The loading or shipment / delivery date: 06/05/2023
d) The date on which the documents were issued:06/05/2023
e) RSPO certificate number: RSPO 739013
<ul> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Crude Palm Oil (CPO) – RSPO MB</li> </ul>
g) The quantity of the products delivered: 41,200 kg
<ul> <li>h) Any related transport documentation: Contract (No. S/PSD/2305/ CPO0013C); Mill's Weighbridge Ticket (No. 023196); Transporter's Collection Note (No. 67816); MPOB L3 Form (G316001)</li> </ul>
<ul> <li>A unique identification number: RSPO PalmTrace Shipping Announcement (Transaction ID No. TR-96c2fff4-aeee, dated 12/06/2023 – within timeline)</li> </ul>
CSPK:
a) The name and address of the buyer: XXX XX XXX, Xxxxx Xxxxx, Xxxxxx, Xxxxxxx
b) The name and address of the seller: Hadapan Palm Oil Mill, Layang-layang, Johor, Malaysia;
c) The loading or shipment / delivery date: 04/09/2023
d) The date on which the documents were issued:04/09/2023
e) RSPO certificate number: RSPO 739013

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		<ul> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Palm Kernel (PK) – RSPO MB</li> <li>g) The quantity of the products delivered: 39,910 kg</li> <li>h) Any related transport documentation: Contract (No. S/PSD/2309/ PK0035); Mill's Weighbridge Ticket (No. 023565); Transporter's Collection Note (No. 065780)</li> <li>i) A unique identification number: RSPO PalmTrace Shipping Announcement (Transaction ID No. TR-252a72f8-f4fe, dated 09/10/2023 – within timeline)</li> </ul>	
5.2.3	<ul> <li>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:</li> <li>If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the product have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation.</li> <li>If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2.</li> </ul>	As Hadapan Palm Oil Mill processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable
5.3 On	pack claims		
5.3.1	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	<ul> <li>Details of RSPO Trademark License of Sime Darby Plantation as below:</li> <li>License No.: RSPO-1106024</li> <li>License Start Date: 23/06/2023</li> <li>License Expiration: 22/06/2025</li> </ul>	Complied

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	purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.	
5.3.2	In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered: A) For Identity Preserved (IP)/ Segregated (SG) Certified Products: • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* *Add RSPO TM Licence Number below or next to the claim.	<ul> <li>Details of RSPO Trademark License of Sime Darby Plantation as below:</li> <li>License No.: RSPO-1106024</li> <li>License Start Date: 23/06/2023</li> <li>License Expiration: 22/06/2025</li> <li>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</li> </ul>	Complied
	<ul> <li>B) or Mass Balance (MB) Certified Products: <ul> <li>RSPO MIXED*</li> <li>Contributes to the production of RSPO certified palm oil*</li> <li>Contains RSPO certified palm oil (MB)*</li> </ul> </li> <li>*Add RSPO TM Licence Number below or next to the claim.</li> </ul>	<ul> <li>Details of RSPO Trademark License of Sime Darby Plantation as below:</li> <li>License No.: RSPO-1106024</li> <li>License Start Date: 23/06/2023</li> <li>License Expiration: 22/06/2025</li> <li>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</li> </ul>	Complied
	<ul> <li>C) For Partially Certified Products:</li> <li>RSPO 50% MIXED*</li> <li>Contains at least 50% RSPO certified palm oil*</li> <li>*Add RSPO TM Licence Number below or next to the claim.</li> </ul>	<ul> <li>Details of RSPO Trademark License of Sime Darby Plantation as below:</li> <li>License No.: RSPO-1106024</li> <li>License Start Date: 23/06/2023</li> <li>License Expiration: 22/06/2025</li> </ul>	Complied

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		However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.	
	<ul> <li>D) For Products covered with Book and Claim (B&amp;C):</li> <li>RSPO CREDITS*</li> <li>Supports the production of RSPO certified palm oil*</li> <li>Contains palm oil covered by the purchase of RSPO Credits*</li> <li>*Add RSPO TM Licence Number below or next to the claim.</li> </ul>	<ul> <li>Details of RSPO Trademark License of Sime Darby Plantation as below:</li> <li>License No.: RSPO-1106024</li> <li>License Start Date: 23/06/2023</li> <li>License Expiration: 22/06/2025</li> <li>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</li> </ul>	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	<ul> <li>Details of RSPO Trademark License of Sime Darby Plantation as below:</li> <li>License No.: RSPO-1106024</li> <li>License Start Date: 23/06/2023</li> <li>License Expiration: 22/06/2025</li> <li>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</li> </ul>	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	<ul> <li>Details of RSPO Trademark License of Sime Darby Plantation as below:</li> <li>License No.: RSPO-1106024</li> <li>License Start Date: 23/06/2023</li> <li>License Expiration: 22/06/2025</li> <li>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been</li> </ul>	Complied

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		made. Consequently, further assessment of this requirement cannot be conducted.	
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.	<ul> <li>Details of RSPO Trademark License of Sime Darby Plantation as below:</li> <li>License No.: RSPO-1106024</li> <li>License Start Date: 23/06/2023</li> <li>License Expiration: 22/06/2025</li> <li>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</li> </ul>	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	<ul> <li>Details of RSPO Trademark License of Sime Darby Plantation as below:</li> <li>License No.: RSPO-1106024</li> <li>License Start Date: 23/06/2023</li> <li>License Expiration: 22/06/2025</li> <li>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</li> </ul>	Complied
MODU	E B – MASS BALANCE SPECIFIC RULES	· · · · · ·	
Mass B	alance palm oil content		
	95% of the palm oil content must be RSPO MB-certified.	Hadapan Palm Oil Mill is deemed to be Mass Balance (MB), where the mill processes Fresh Fruit Bunches (FFB) from both RSPO-certified sources and uncertified plantations/estates (OCPs). It was verified that POM processes certified and uncertified FFB without physically separating them. Therefore, it is affirmed that 100% of the palm oil content is RSPO MB-certified.	Complied

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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.	Hadapan Palm Oil Mill is deemed to be Mass Balance (MB), where the mill processes Fresh Fruit Bunches (FFB) from both RSPO-certified sources and uncertified plantations/estates (OCPs). It was verified that POM processes certified and uncertified FFB without physically separating them. Therefore, it is affirmed that 100% of the palm oil content is RSPO MB-certified.	Complied
Messaging		
Messaging ALLOWED in storytelling in product-specific communications includes: • [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]	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that there is no storytelling in product-specific communications made by the management.	Complied
in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.		
Product-Specific Communications Labelling		
<ul> <li>Members are allowed to use the RSPO Label in one of the following ways:</li> <li>The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil".</li> </ul>	<ul> <li>Details of RSPO Trademark License of Sime Darby Plantation as below:</li> <li>License No.: RSPO-1106024</li> <li>License Start Date: 23/06/2023</li> <li>License Expiration: 22/06/2025</li> <li>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</li> </ul>	Complied
Principle 4: Respect community and human rights and deliver benefits		

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Criteri	on 4.1: The unit of Certification respects human rights, which includes re	especting the rights of Human Rights Defenders.	
4.1.1	(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. <ul> <li>Critical (Major) compliance -</li> </ul>	Sime Darby Plantation Berhad has established human right charter as commitment to respect human right updated on June 2023. Commitment of Sime Darby Plantations has been outlined in clause 3.2 which included but not limited to equal opportunities, respecting freedom of association, combating modern slavery, enhancing health and safety, protecting the right of children, and eliminating violence and harassment. Other than that, Sime Darby Plantation Berhad has been established other policy regards to human right defender in the document "Policy on the Protection of Human Rights Defenders (HRDs)" updated 2020 which clearly stated in clause 3.2 that in the course of their engagement with SDP shall be protected from violence, threats and all forms of retaliation. Communication of the policy has been done through the stakeholders consultations that that has been conducted on 24/08/2023 with attendance for various stakeholders for all operating units under SOU 24 – Hadapan Palm Oil Mill & Supply Bases. Communication of the policy has been done and verified based on the	Complied
		training records (Kulai Estate: 08/05/2023,24/06/2023; Layang Estate: 10/07/2023; CEP Renggam Estate: 27/09/2023) and interview with the sample workers.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	As per verification through interview and documentation, there is evidence that all operating units under SOU 24 – Hadapan Palm Oil Mill & Supply Bases did instigate violence or use any form or harassment There is no cases of harassment included sexual harassment, bullying and abuse has been reported and identified by auditor during the audit.	Complied
Criteri	on 4.2: There is a mutually agreed and documented system for dealing w	ith complaints and grievances, which is implemented and accepted by all	affected parties
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring	Grievance procedure has been established Grievance Response Standard Operating Procedure updated on 18/07/2022 where the	Complied
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	<ul> <li>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.</li> <li>- Critical (Major) compliance -</li> </ul>	management of has established several methods to make any complaint such as workers representative meeting (social dialogue on monthly basis), gender committee meeting every 2 months, online platform (suara kami, whistleblowing) and also through email that will be handle by Grievance units. The procedure also classified the cases for complainer that required to maintain anonymous or not.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	There is evidence that the procedure has been made available and in place where their procedure has been communicated to all workers during morning muster call on weekly basis. Other than that, it has been posted at the housing quarters, muster round and office. QR for <i>Suara Kami</i> has been pasted at the safety helmet for each worker. As per interview, workers and stakeholders can demonstrate their understanding on procedures. There is no illiterate parties has been identified for each operating unit.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	There is evidence that any grievance that has been raised by workers/stakeholders has been responded in timely manner. As per interview with the workers, the management of each operating units is responsive for all complaint/grievance receive. Total 8 grievances have been received for SOU 24 – Hadapan Palm Oil Mill & Supply Bases which has been responded within 3 months which some of the cases where anonymous and required investigation.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	Sime Darby Plantation Berhad has implemented Grievances Response Standard Operating Procedure dated 18/07/2022 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute	Complied

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		resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.	
Criterie	on 4.3: The unit of Certification contributes to local sustainable developm	nent 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 -	Sime Darby Plantations contributions to local sustainable development with consultation with local communities and discuss the issues includes social and environment benefits. The contribution made been includes the solutions to address on educations, donations, tree planting, etc. The program demonstrated in the company's website as per link as following: <u>https://www.yayasansimedarby.com/our- projects/community-health</u> For the UoC, sample contributions to community development, derived from consultation with local communities, include: (1) Contribution to an Indian temple for electrical wiring. (2) Contribution to support school activities. (3) Contribution towards providing water to local communities. (4) Contribution of funds to government agencies.	Complied
		development initiatives and reflect the outcomes of consultations with the local communities.	
Criterie	on 4.4: Use of the land for oil palm does not diminish the legal, customa	ry or user rights of other users without their free, prior and informed cons	sent.
4.4.1	<ul> <li>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</li> <li>Critical (Major) compliance -</li> </ul>	Based on the provided information and land title samples, it is confirmed that Sime Darby Plantation Berhad (SDP) owns the land titles for the mentioned estates, and the right to use the land for oil palm cultivation is legally established. The land titles are held in perpetuity, and there are no recorded disputes over the ownership of the land. Additionally, there have been no changes to land ownership or new land acquisitions since the last assessment. The sampled land	Complied

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	es include details such d ownership records, w		
(1) Hadapan Palm Oil Mill is located in the Layang Estate area. The management has allocated approximately 13.00 hectares out of 1,113.1198 hectares for the POM. Land title for this POM:			
	Lot. No.	Land Title No.	Area (Ha.)
	MLO 6529	HSD 39413	1,133.1198
(2)	Seri Pulai Estate po 2,099.8334 hectares.		with a total area of
	Lot. No.	Land Title No.	Area (Ha.)
	Lot 2938	326461	1,420.4444
	Lot 3606	319647	56.5547
	Lot 3818	326460	38.0657
(3)	Kulai Estate posses 3,065.5989 hectares.	sed 32 land titles v Sampled as below:	vith a total area o
(3)	Kulai Estate posses 3,065.5989 hectares.	sed 32 land titles v Sampled as below: Land Title No.	vith a total area o Area (Ha.)
(3)	Kulai Estate posses 3,065.5989 hectares. Lot. No. Lot 3632	sed 32 land titles v Sampled as below: Land Title No. 237360	vith a total area c <b>Area (Ha.)</b> 772.5437
(3)	Kulai Estate posses 3,065.5989 hectares. Lot. No. Lot 3632 Lot 48066	sed 32 land titles v Sampled as below: Land Title No. 237360 593019	vith a total area o <b>Area (Ha.)</b> 772.5437 564
(3)	Kulai Estate posses 3,065.5989 hectares. Lot. No. Lot 3632 Lot 48066 Lot 48081	sed 32 land titles v Sampled as below: Land Title No. 237360 593019 593032	vith a total area o Area (Ha.) 772.5437 564 293.1
(3)	Kulai Estate posses 3,065.5989 hectares. Lot. No. Lot 3632 Lot 48066 Lot 48081 Lot 3570	sed 32 land titles v Sampled as below: <b>Land Title No.</b> 237360 593019 593032 237467	vith a total area o <b>Area (Ha.)</b> 772.5437 564 293.1 243.0133
(3)	Kulai Estate posses 3,065.5989 hectares. Lot 3632 Lot 48066 Lot 48081 Lot 3570 Lot 48082	sed 32 land titles v Sampled as below: <b>Land Title No.</b> 237360 593019 593032 237467 593033	vith a total area of <b>Area (Ha.)</b> 772.5437 564 293.1 243.0133 207.5
(3)	Kulai Estate posses 3,065.5989 hectares. Lot. No. Lot 3632 Lot 48066 Lot 48081 Lot 3570	sed 32 land titles v Sampled as below: <b>Land Title No.</b> 237360 593019 593032 237467	vith a total area o <b>Area (Ha.)</b> 772.5437 564 293.1 243.0133
	Kulai Estate posses 3,065.5989 hectares. Lot 3632 Lot 48066 Lot 48081 Lot 3570 Lot 48082	sed 32 land titles v Sampled as below: <b>Land Title No.</b> 237360 593019 593032 237467 593033 593028 possessed 59 land ti	vith a total area of <b>Area (Ha.)</b> 772.5437 564 293.1 243.0133 207.5 172.1
	Kulai         Estate         possess           3,065.5989         hectares.           Lot.         No.           Lot 3632         Lot 48066           Lot 48081         Lot 3570           Lot 48082         Lot 48089           CEP Renggam Estate         Center State	sed 32 land titles v Sampled as below: <b>Land Title No.</b> 237360 593019 593032 237467 593033 593028 possessed 59 land ti	vith a total area of <b>Area (Ha.)</b> 772.5437 564 293.1 243.0133 207.5 172.1

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			L at 4022	F201F7	412.0	
			Lot 4933	530157	412.9	
			Lot 507	94495	313.2266	
			Lot 1116	83492	92.3189	
			Lot 2328	340638	78.6606	
			Lot 87	100250	64.8761	
			Lot 1946	93832	16.9209	
			Lot 1971	341774	11.0656	
		(5)	Layang Estate posses 3,108.0112 Ha. Samp		t bring a total area of	
			Lot. No.	Land Title No.	Area (Ha.)	
			Lot MLO 6529	39413	1,133.1198	
			Lot 91	38676	809.1575	
			Lot 94	99277	402.5806	
			Lot 2765	87146	246.8582	
			s verification through l nt to use the land for c		SDP has the legitimate ne mentioned estates.	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	sta		on. Boundary stone	was verified through and trenches were	Complied
		Pla Cla info cor	ntation established Hu use 3.1.1 on handling prmed consent (FP	man Rights Charter las conflict by undertaking IC) process to ar	e (if any), Sime Darby st revised 2020, under robust free, prior and ny new developed, ints from external	

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

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		operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land. In order to deal with future arising land dispute (if any), Sime Darby Plantation established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.	Complied
4.4.5	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land. In order to deal with future arising land dispute (if any), Sime Darby Plantation established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land. In order to deal with future arising land dispute (if any), Sime Darby Plantation established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed,	Complied

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		communication, consultation and complaints from external stakeholders.	
		can be demonstrated that there are legal, customary or user rights, wit akeholders to express their views through their own representative institu	
4.5.1	<ul> <li>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</li> <li>- Critical (Major) compliance -</li> </ul>	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 24 – Hadapan Palm Oil Mill & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SDP. Therefore, community representation through institutions of their own choosing cannot be further assessed.	Complied
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 24 – Hadapan Palm Oil Mill & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SDP. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 24 – Hadapan Palm Oil Mill & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SDP. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.	Complied

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4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 24 – Hadapan Palm Oil Mill & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SDP. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 24 – Hadapan Palm Oil Mill & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SDP. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the SOU 24 – Hadapan Palm Oil Mill & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally owned by SDP. Therefore, FPIC is obtained for all oil palm development through a comprehensive process cannot be further assessed.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There is no evidence of any land acquired for plantations or mill after 15 November 2018 within SOU 24 – Hadapan Palm Oil Mill & Supply Bases.	Complied



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4.5.8	<ul> <li>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</li> <li>- Critical (Major) compliance -</li> </ul>	There is no evidence of any new lands acquired in areas inhabited by communities in voluntary isolation.	Complied
	<b>on 4.6:</b> Any negotiations Concerning compensation for loss of legal, custors, local communities and other stakeholders to express their views through	mary or user rights are dealt with through a documented system that enant their own representative institutions.	bles indigenous
4.6.1	<ul> <li>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</li> <li>- Critical (Major) compliance -</li> </ul>	Sime Darby Plantations 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 Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Sime Darby Plantations 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 Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	The absence of reported issues related to the loss of legal customary rights with indigenous peoples, local communities, and other stakeholders is a positive finding during the audit. Additionally, the presence of boundary stones and trenches to demarcate land boundaries adds a layer of transparency and visibility, contributing to	Complied

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		clear delineation and potentially minimizing disputes over land boundaries.	
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	The absence of reported issues related to the loss of legal customary rights with indigenous peoples, local communities, and other stakeholders is a positive finding during the audit. Additionally, the presence of boundary stones and trenches to demarcate land boundaries adds a layer of transparency and visibility, contributing to clear delineation and potentially minimizing disputes over land boundaries.	Complied
	<b>on 4.7:</b> Where it can be demonstrated that local peoples have legal, shment of rights, subject to their FPIC and negotiated agreements.	customary or user rights, they are compensated for any agreed land a	acquisitions and
4.7.1	<ul> <li>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</li> <li>- Critical (Major) compliance -</li> </ul>	Sime Darby Plantations 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 Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.7.2	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	Sime Darby Plantations 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 Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied



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4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	There was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area. It was confirmed during interview with local communities where all operating unit under SOU 24 – Hadapan Palm Oil Mill & Supply Bases has been planted with oil palm for third cycle.	Complied
Criterio rights.	<b>0n 4.8:</b> The right to use the land is demonstrated and is not legitimately	contested by local people who can demonstrate that they have legal, cus	tomary, or user
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied



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4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Princip	le 5: Support smallholder inclusion		
Criterio	on 5.1: The unit of certification deals fairly and transparently with all small	allholders (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 -	During the audit, it was verified that Hadapan Palm Oil Mill has made the current and previous prices of FFBs are publicly available and accessible to the OCP that supplying to the mill. The current FFB price is displayed daily at the weighbridge counter for reference, and the previous prices can be obtained at the weighbridge counter. The prices are based on the MPOB Daily FFB Reference Price Summary by Region.	Complied
5.1.2	<ul> <li>(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).</li> <li>- Critical (Major) compliance -</li> </ul>	On 05/04/2023, Hadapan SOU Chairman, Hadapan Mill Manager, and representative from OCP Upstream Business Support held a meeting with Outside Crop Purchase (OCP) to discuss the supply of their FFB to Hadapan Palm Oil Mill. Among other things discussed is also explains the FFB pricing to the OCP.	Complied
5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented. - Critical (Major) compliance -	<ul> <li>Fair pricing, including premium pricing is agreed with smallholders in the supply base and documented. The following contracts were sampled for verification:</li> <li>OCP ABC (Agreement No. P/P/1222/FFB03978L) – valid until 31/12/2023</li> <li>OCP KLM (Agreement No. P/P/1222/FFB0379L) – valid until 31/12/2023</li> <li>OCP XYZ (Agreement No. P/P/1222/FFB03983L) – valid until 31/12/2023</li> </ul>	Complied

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5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	On 05/04/2023, Hadapan SOU Chairman, Hadapan Mill Manager, and representative from OCP Upstream Business Support held a meeting with Outside Crop Purchase (OCP) to discuss the supply of their FFB to Hadapan Palm Oil Mill. Currently The OCPs supplied the FFBs to the mill are outgrowers and collection centres only and no independent smallholders supply their FFBs to the palm oil mill.	Complied
	- Critical (Major) compliance -	During the meeting, various topics were addressed, including discussions on FFB pricing and initiatives to improve bin and transport arrangements, as well as mopping and segregation exercises. The primary objective of these discussions is to attract and ensure consistent FFB supply from the OCPs. Notably, there were no requests from the OCPs for financial assistance, loans/credits, or repayments through FFB price reductions for replanting or other support mechanisms. The Malaysian Government via MPOB has allocated subsidies for replanting activities, particularly for outgrowers and independent smallholders, eliminating the need for such requests.	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	<ul> <li>During the audit, evidence was found that Hadapan Palm Oil Mill engage in fair and transparent dealings with their OCPs. Sampled contracts were sighted, which contained provisions related to the contract duration, rights and obligations of the parties involved, as well as the rates payable and agreed terms of payment. Sampled contracts were signed with the following OCPs:</li> <li>OCP ABC (Agreement No. P/P/1222/FFB03978L) - valid until 31/12/2023</li> <li>OCP KLM (Agreement No. P/P/1222/FFB0379L) - valid until 31/12/2023</li> </ul>	Complied
		<ul> <li>OCP XYZ (Agreement No. P/P/1222/FFB03983L) – valid until 31/12/2023</li> </ul>	

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5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -				e timely payments owing information	Complied
			OCP ABC: Invoice 23 (Ref. No. P/AF\		3; payment made	
		,	OCP KLM: Invoice 23 (Ref. No. P/AF\		3; payment made	
			OCP XYZ: Invoice 23 (Ref. No. P/AF\		3; payment made	
		the confirmation agreed payments	of stakeholders d were made in a t	uring the intervie imely manner by	ent vouchers, and ew confirmed that Hadapan Palm Oil ensation for their	
5.1.7	<ul> <li>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</li> <li>Minor compliance -</li> </ul>					Complied
		Weighbridge Serial No.	Calibration Date	D Form No.	Calibration Report Ref. No.	
				alm Oil Mill	Report Ren Hor	
		195050377	05/07/2023	B1809359	002953	
		221050107	05/07/2023	B1809358	002954	
				<u>Estate</u>		
		01537886LP	09/10/2023	D 207038	A 035135	
		01537906LD	03/01/2023	D 051136	A 021158	

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			CEP Rengo	am Estate		
		B521963093	25/07/2023	D 127084	A 013628	
			Layang	<u>Estate</u>		
		B737684742	06/11/2023	D 127588	A 013691	
			Seri Pula	<u>ii Estate</u>		
		* The weighbi	ridge is not in use; t	herefore, no calibra	ation is needed.	
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 -	to Hadapan Palm subject to further Nevertheless, wit (SDP), as highligh explicitly articula Smallholders wit	o Oil Mill. Thus, the assessment durin thin the broader ated in SDP's 2021 ates its commitn h certification. T compasses region	nis specific requi og the current au scope of Sime I Sustainability Re nent to support his commitment	hat supplying FFBs rement cannot be dit. Darby Plantation's port, the company ting Independent extends beyond hesia, Papua New	Complied
5.1.9	<ul> <li>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</li> <li>- Critical (Major) compliance -</li> </ul>	Operation Manu documented the 5.5, Appendix 5.5 However, Indepe supplying FFBs	ual dated 1/11 procedure for Ext 5.3.2) specifically f endent Smallholde to Hadapan Pa	/2008, which ernal Communic or grievance han ers is not part Im Oil Mill. Th	in the Standard comprehensively ation (sub-section dling. of the OCPs that hus, this specific sment during the	Complied
Criteri	on 5.2: The unit of certification supports improved livelihoods of smallho	lders and their inclu	usion in sustainab	e palm oil value	chains.	
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	representative fro with Outside Cro	om OCP Upstream p Purchase (OCP) Oil Mill. Among otl	Business Suppo to discuss the s ner things discuss	Mill Manager, and ort held a meeting upply of their FFB sed is also explains on the proposed	Complied

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	- Minor compliance -	initiative for bin and transport arrangement and mopping/segregation exercise.	
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	On 05/04/2023, Hadapan SOU Chairman, Hadapan Mill Manager, and representative from OCP Upstream Business Support held a meeting with Outside Crop Purchase (OCP) to discuss the supply of their FFB to Hadapan Palm Oil Mill. Among other things discussed is also explains the FFB pricing to the OCP and their feedback on the proposed initiative for bin and transport arrangement and mopping/segregation exercise.	Complied
		However, Independent Smallholders is not part of the OCPs that supplying FFBs to Hadapan Palm Oil Mill. Thus, this specific requirement cannot be subject to further assessment during the current audit.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Throughout the audit process, it was ascertained that Hadapan Palm Oil Mill meticulously verifies the validity of the MPOB License for each FFBs supplier, including owned supply bases, SDP owned estates, and OCPs. The issuance of the license is the responsibility of MPOB, a government agency entrusted with serving the country's oil palm industry. The licensing process is governed by the Malaysian Palm Oil Board (Licensing) Regulations 2005, under the Malaysian Palm Oil Board Act 1998. This ensures that every FFB received by the mill is in compliance with the regulations set by the Malaysian Government. Additionally, the Malaysian Government mandates that every FFB producer in the country be certified with MSPO (Malaysian Sustainable Palm Oil) certification.	Complied
		The combination of MPOB licensing and MSPO certification demonstrates that Hadapan Palm Oil Mill and its FFB suppliers operate in accordance with the regulations and standards set by the Malaysian Government for the palm oil industry.	

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5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	On 05/04/2023, Hadapan SOU Chairman, Hadapan Mill Manager, and representative from OCP Upstream Business Support held a meeting with Outside Crop Purchase (OCP) to discuss the supply of their FFB to Hadapan Palm Oil Mill. Among other things discussed is also explains the FFB pricing to the OCP and their feedback on the proposed initiative for bin and transport arrangement and mopping/segregation exercise. However, Independent Smallholders is not part of the OCPs that supplying FFBs to Hadapan Palm Oil Mill. Thus, this specific requirement cannot be subject to further assessment during the current audit.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Independent Smallholders is not part of the OCPs that supplying FFBs to Hadapan Palm Oil Mill. Thus, this specific requirement cannot be subject to further assessment during the current audit. Nevertheless, within the broader scope of Sime Darby Plantation's (SDP), as highlighted in SDP's 2021 Sustainability Report, the company explicitly articulates its commitment to supporting Independent Smallholders with certification. This commitment extends beyond Malaysia and encompasses regions such as Indonesia, Papua New Guinea, and the Solomon Islands.	Complied
Princip	le 6: Respect workers' rights and conditions		
Criterio	on 6.1: Any form of discrimination is prohibited.		
6.1.1	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	Documented in the human right charter revised in year 2020 which clearly stated that Sime Darby Plantation Berhad will not tolerate 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. As per verification for each operating units, there is evidence that there is no discrimination has been practices. Foreign workers from different origin, different	Complied

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6.1.2	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	<ul> <li>gender has been treated equally and has been given same opportunities. This has been verified by the auditor through interview with the workers from different origin, races, gender.</li> <li>There is evidence that there are no parties has been discriminated by the management where it has been confirmed through interview, site visit and records review. Sample has been taken for women workers where they have been treated equally as other workers where there has been paid equally with other workers which work as same job scope and entitle with the same benefits. All foreign workers have been allocated at the same housing compound and received same benefits regardless of the origin. There are no recruitment fees has been charged to all foreign workers that has been recruited in year 2023. It has been confirmed through interview with the new recruited workers.</li> </ul>	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	There is evidence that operating units has demonstrate that recruitment base on capabilities and qualities which has been verified during the interview by the operating units and for foreign workers at the origin countries. Sample of 12 workers has been taken from different origin countries, races and gender and has been verified based on interview, and documentation such as medical checkup and interview records.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	There is no pregnancy test has been done in all operating units. It has been confirmed through interview with Hospital Assistant and female workers. If there is any cases of delaying on menstrual, hospital assistant will advised the female workers to conducted test to nearest government health clinic.	Complied
6.1.5	<ul> <li>(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.</li> <li>- Critical (Major) compliance -</li> </ul>	Gender committee meeting has been established for each operating and region level. The objective of the committee has been established as mechanism to raise awareness on the company policy and to identify and address any issues that related to gender. Meeting has been conducted 6 months once and minutes meeting has been sighted and verified where issues has been discussed and addressed.	Complied

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		For Seri Pulai Estate, Gender committee meeting has been established and has been chaired by Puan Faizah binti Paiman and latest meeting has been conducted on 12/05/2023, 18/08/2023 and 16/11/2023. While for Kulai Estate, gender committee has been chaired by Puan Barathi Ramachandran.	
		Gender committee has been established for Hadapan Palm Oil Mill which has been chaired by Puan Nur Alia Nazira Binti Mohd Yusop. Gender committee meeting has been conducted on 28/07/2023 and 25/11/2023.	
		While for Layang Estate, Puan Alisa binti Ahmad has been appointed as chairman.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Based on the review of employment contracts and monthly pay slips, it has been confirmed that each operating unit within the SOU 24 – Hadapan Palm Oil Mill & Supply Bases ensures equal pay for the same scope of work irrespective of gender and nationality. The evidence indicates that all workers are remunerated in accordance with the Minimum Wages Order 2022 and the Collective Agreement between MAPA and NUPW.	Complied
		Interviews conducted with sampled workers corroborate this finding, and documentation such as pay slips and punch cards for the months of Mac-23, Jun-23, and Sept-23 further support the adherence to fair pay practices across the board.	
	<b>n 6.2:</b> Pay and conditions for staff and workers and for contract worker ving wages (DLW).	s always meet at least legal or industry minimum standards and are suff	icient to provide
6.2.1	<b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Collective agreement between Sime Darby Plantations Berhad and national union of plantation workers (NUPW) for Palm Oil Mill Employees, 2020 registered 09/03/2020 valid until December 2022 reference number COG. NO: 057/2020. Other than all operating units	Complied

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		complies with Minimum Wage Order 2022 at rate RM1500/months, RM57.69/day or RM7.21/hour.	
6.2.2	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	Payment details and employment terms are clearly outlined and formally recorded in employment contracts provided to all employees. These contracts encompass various aspects, such as the employment duration, working hours, overtime policies, annual and medical leave entitlements, public holiday arrangements, mutual termination provisions, maternity benefits, and more. Importantly, these terms are in strict adherence to the Employment Act of 1955, the Minimum Wages Order of 2020, the SOCSO Act of 1969, the EPF Act of 1991, the EIS Act of 2017, and the MAPA/NUPW agreement. Additionally, payroll documents, specifically payslips, provide accurate and comprehensive information regarding compensation for all labor performed. This encompasses individuals receiving daily rated wages, piece-rated wages, payments for any overtime work, and remuneration for public holidays. Furthermore, our examination of sampled payslips confirms that all wages were disbursed in full compliance with the applicable national legal requirements. Salary deductions and overtime payments align with the stipulations of the relevant laws, including SOCSO, EPF, EIS, and are also in accordance with Labor Office permits. It is noteworthy that none of the sampled employees had family members engaged in any work within this context.	Complied
6.2.3	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	For all operating units, stated in the employment contract working hours, deduction, overtime and leave entitlement. Mentioned in the employment contract that entitlement of leave is depending on the length of service. For workers less than 2 years services, they are entitled for 14 days of sick leave and 8 days of annual leave. Highlighted in the contract reasons for dismissal, period of notice and other legal labour requirements.	Complied

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6.2.4	<b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. - Critical (Major) compliance -	The essential services and amenities available to workers in the company-provided housing include electricity, water, and domestic waste disposal. The government supplies electricity, and the cost is deducted from the employees' salaries. Regarding water, the company offers up to 35 gallons per employee per day at no cost, and any additional usage is subject to charges based on prevailing domestic rates. The budget for housing repairs, sanitation, garden maintenance, as well as CAPEX and OPEX across all operating units has been reviewed. The records for weekly on-site inspections by the Medical Assistant (estate) and QA (mill) are examined on a fortnightly basis in accordance with the Workers Minimum Housing and Amenities	Complied
		Regulation 2020. Workers Housing Management Procedure and 'OxxPxxxPxx' Digital Housing Complaint System (OPP DHCS). Inter-office mail (Ref. No: UM/HSE/013/11/2021), dated 26/11/2021 from CEO Upstream Malaysia. General house rule is written under "Peraturan Umum Kompleks Perumahan Pekerja".	
		For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g., mattress, cooking utensils).	
		A creche, named Nursery for Estate Toddler (NEST), has been established in CEP Renggam Estate with comprehensive facilities including a dedicated building, toys, and educational materials. The management has allocated female workers as caretakers for the creche, providing services until the evening, and the facilities are made available to workers/staff free of charge.	

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6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	There are sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient, and affordable foods and goods. Price of goods was displayed at the sundry shops. Workers' interview confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town.	Complied
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. <b>PROCEDURAL NOTE:</b> STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate). <i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i> In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration	SOU 24 – Hadapan Palm Oil Mill & Supply Bases has provided the decent living wage for both local and foreign workers based on prevailing wages assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. It has been verified by auditor base on the sample payslips for each operating units showed that the salary received complied with the minimum wage order 2020 and 2022. The management conducted prevailing wage assessment based on checkroll worker for period of March to May 2023.	Complied

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	and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.			
	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).			
	Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:			
	<ul> <li>Updated assessment on prevailing wages and in-kind benefits</li> </ul>			
	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			
	<ul> <li>The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul>			
	- Minor compliance -			
6.2.7	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 - Minor compliance -	The core job in SOU 24 – Hadapan Palm Oil Mill & Supply Bases are exclusively carried out by permanent, full-time employees. No temporary or contract workers have been engaged in these operations. The estate has, however, enlisted the services of a contractor for the transportation of Fresh Fruit Bunches (FFB), and these workers maintain a permanent presence within the estate's operations.	Complied	
freedom	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 reedom 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.			

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6.3.1	<b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented Critical (Major) compliance -	Stated in the Human Right Charter year 2020, commitment of Sime Darby Plantation Berhad to practices freedom of association as per stated in clause 3.2.4, Sime Darby Plantation will respect freedom of association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, we will provide alternative means of employee engagement and grievance redressal. During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join union. Communication of the policy has been done and verified based on the training records and interview with the sample workers. Kulai Estate: 08/05/2023, 24/06/2023 Layang Estate: 10/07/2023 CEP Renggam Estate: 27/09/2023	Complied
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request. - Minor compliance -	NUPW Committee was established in SOU 24 – Hadapan Palm Oil Mill & Supply Bases and sighted minutes meeting for latest meeting. Management plan was developed for the issues raised by the NUPW representatives and action has been taken accordingly. Interviewed with the NUPW representatives confirmed that the issues raised during the meeting were resolved. He informed that there is no further pending issue reported during the time of audit. The minutes meeting has been established in Bahasa Malaysia.	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	It has been confirmed through interviews with workers that the management did not interfere with the formation of any association related to workers. Additionally, there have been no complaints regarding management interference with the freedom to join any association, as evidenced by records of complaints and grievances (based on <i>Buku Rekod Aduan dan Rungutan</i> ).	Complied

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		The selection of representatives has been conducted through elections facilitated by the WhatsApp application. Furthermore, evidence suggests that representatives have been chosen based on various categories including gender, race, and country of origin, ensuring a diverse and inclusive representation.	
Criterie	on 6.4: Children are not employed or exploited.		
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	SDP has established policy to protect children and prohibition of child labour which has clearly stated in clause 3.3 Respect and Uphold Children's Rights which clearly stated commitment of the management to recognise that protect wellbeing of children and from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography by. Sighted in clause 3.3.1 Eradicating child labour in all operating units and will not employ anyone under the age of 18 years.	Complied
6.4.2	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	As per verification through the master list, there is evidence that the minimum ages requirement (18 years) has been met. It also has been further verified based on the personal file and interview with sample workers. Site visit has been conducted as additional method to confirm compliance. Age screening process has been documented in the Guidance on recruitment of local workers dated 30/08/2023 where any application received need to include with identity cards and for migrant workers it has been documented in Migrant workers recruitment procedure year 2021.	Complied
6.4.3	<ul> <li>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</li> <li>- Critical (Major) compliance -</li> </ul>	There are no young persons that has been recruited in all operating units under SOU 24 – Hadapan Palm Oil Mill & Supply Bases and has been verified based on master list of workers, interview with sample workers and site visit. It also has been clearly mentioned in the Human Eight Charter revied 2020 clause 3.3 Respect and Uphold Children's	Complied

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6.4.4	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.	Rights 3.3.1; Eradicating child labour in our supply chain and SDP will not employ anyone under the age of 18 years.Communication of the policy has been done through the stakeholders' consultations that that has been conducted on 24/08/2023 with attendance for various stakeholders for all operating units under SOU 24 – Hadapan Palm Oil Mill & Supply Bases.	Complied
Criteri	on 6.5: There is no harassment or abuse in the workplace, and reproduc	tive rights are protected.	
6.5.1	<ul> <li>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</li> <li>Critical (Major) compliance -</li> </ul>	Stated in the Human Right Charter revised in 2020 in clause 3.2.6 which the management of the Sime Darby Plantation Berhad is committed in creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. Verification has been done by the auditor in term of implementations of the procedure where all the workers has been communicated on the policy and prohibition to do any types of harassment. There are no cases of harassment happen in all operating units. Communication of the policy has been done and verified based on the training records (Kulai Estate: 08/05/2023, 24/06/2023; Layang Estate: 10/07/2023; CEP Renggam Estate: 27/09/2023), and interview with the sample workers.	Complied
6.5.2	<ul> <li>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</li> <li>- Critical (Major) compliance -</li> </ul>	Stated in the Human Right Charter revised in 2020 in clause 3.2.5 which the management of the Sime Darby Plantation Berhad is committed to facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. Implementation of the procedure has been verified where there is no prohibition for the local workers to pregnant and deliver. In Seri Pulai Estate, there is one clerk give birth in year 2021, Kulai Estate, storekeeper give birth in year	Complied

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		2023 and for Layang Estate, there is 2 female workers deliver in year 2022. Communication of the policy has been done and verified based on the training records (Kulai Estate: 08/05/2023,24/06/2023; Layang Estate: 10/07/2023; CEP Renggam Estate: 27/09/2023), and interview with the sample workers. Interview with the sample workers confirm that they can demonstrate their understanding on the policy.	
6.5.3	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. - Minor compliance -	Seri Pulai Estate: New mother assessment has been conducted on 1 female worker that working as storekeeper on 06/06/2023. There is only request by the new mother which she request for dedicated space for breastfeed or storing milk. Kulai Estate: New mother assessment has been conducted for 1 female worker that has worked as storekeeper giving birth on 15/04/2023 and the assessment has been done 2 months on 04/09/2023 and 04/07/2023.	Complied
		Layang Estate: New mother assessment has been conducted on 01/08/2023 for 2 new mothers. There is no special request by the new mother. CEP Renggam Estate: Assessment of new mother has been done on 23/05/2023 and 22/08/2023 which identified 3 workers has deliver in	
		year 2023. Hadapan Palm Oil Mill: Assessment for new mother has been done on 22/11/2023 for 3 new mother which there is 1 request for storing milk. Refrigerator has been provided by the management.	
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 -	It has been clearly stated in the Policy on the protection of human rights defenders (HRDs) year 2020 clause 3.3; protection against threats and retaliations that HRD and individual shall be protected from violence, threats and all form of retaliation and clause 3.1; the identity of individuals and information shared in by HRDs, shall be kept	Complied

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Criterio	on 6.6: No forms of forced or trafficked labour are used.	confidential to the fullest possible extent in a manner consistent with the need to conduct an investigation, unless the individual consents to disclosure or if disclosure is otherwise required by law.	
6.6.1	<ul> <li>(C) All workers have entered into employment voluntarily and the following are prohibited:</li> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>Charging the workers for recruitment fees.</li> <li>Contract substitution</li> <li>Involuntary overtime</li> <li>Lack of freedom of workers to resign</li> <li>Penalty for termination of employment</li> <li>Debt bondage</li> <li>Withholding of wages</li> <li>Critical (Major) compliance -</li> </ul>	<ul> <li>As per verification through interview and documentation, there is evidence that all workers included migrant workers has been recruited voluntarily.</li> <li>i) There is no retention of passport has been practised for each operating unit. It has been verified base interview through interview with sample of migrant workers during the site visit at workers quarters. As per respond, the workers said that they only need submit their passport for permit renewal.</li> <li>ii) As per interview, there is no recruitment fees has been charged to all newly recruited workers for both local and migrant workers. All the workers that have been interviewed recruited for free from the origin countries until the allocated estates. Sample has been taken for recruitment done in year 2023.</li> <li>iii) There is no contract substitution has been practices which has been confirmed through interview. All the workers responded that they are aware that they will locate at Sime Darby Plantation and works as plantation workers and decision on which operating units will be decided at induction centre located at Sua Betong Estate.</li> <li>iv) For all operating units, there is absence of involuntary overtime, a fact that has been verified through interviews. Workers expressed that they have the freedom to decline overtime if they are unwilling to take on additional hours. Furthermore, the workers conveyed that they find greater satisfaction in willingly engaging in overtime rather than remaining at home.</li> </ul>	Complied

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		<ul> <li>v) There is no withholding of wages has been practices where wages have been paid through bank account. It has been confirmed based on interview and verification of salary payment and sample has been taken for month March'23, June'23 and September'23</li> <li>vi) No debt bondage or debt has been provided to all the workers. It has been verified based on the pay slips and interview with the workers.</li> </ul>	
		All workers that have been recruited is free to resign as per stipulated in the employment contract. However, the workers are tied with agreement to provide notice prior to resignation and there is no penalty has been issued for any resignation.	
6.6.2	<b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented Critical (Major) compliance -	Sime Darby Plantations Berhad has established specific procedure for migrant workers which has been established in the document title Migrant Worker Responsible Recruitment Procedure year 2021. The objective of the procedure is to ensure that our workforce is hired ethically and responsibly.	Complied
		Stated in the procedure that clear and transparent term and condition need to be provided to all migrant workers and there is no retention of passport.	
		Verification has been done by sample of migrant workers found out that all workers has been provided with transparent and clear employment contract and has been signed by both parties. Interview with the workers also confirmed that they have been provided copy of the employment contact.	
		Passport has been kept by the workers itself. During site visit to workers housing, the auditor asked the workers to show the passport and there is evidence it has been kept at the house.	
		From the verification, there is evidence that the procedure has been implemented by the management of each operating units.	

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Criterio	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	(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 Critical (Major) compliance -	<ul> <li>Each Operating Unit of SOU 24 – Hadapan Palm Oil Mill &amp; Supply Bases is adopting Safety &amp; Health Committee Procedure (UM/HSE/OCP/08, dated 17/11/2021) with the objective:</li> <li>To introduce the concept of consultation and cooperation between the employer and employee by the formation of the Safety and Health Committee (SHC) at workplace in compliance with legal requirements</li> <li>To ensure two-way communication between employer and employee</li> <li>To increase the interest and motivation of employees to participate in safety and health related programme.</li> <li>The respective Managers were appointed as ESH Chairman (PIC) through letter signed by Regional General Manager. All letters were made available for verification. Sighted appointment letter as below:</li> <li>Seri Pulai Estate: appointment letter for Estate Manager as Chairman dated 10/03/2023 by Regional General Manager; for Assistant Mnager as Secretary dated 01/07/2023 by Estate Manager;</li> <li>Kulai Estate: appointment letter for Estate Manager as Chairman dated 15/12/2022 by Regional General Manager; for tractor driver as Employee Representative dated 01/06/2023 by Estate Manager.</li> <li>CEP Renggam Estate: appointment letter for Estate Manager as Chairman dated 16/01/2023 by Regional General Manager; for Assistant Mnager as Secretary dated 01/08/2023 by Estate Manager.</li> </ul>		

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Manager, for mandore as Employee Representative dated 16/01/2023 by Estate Manager.         Layang Estate: appointment letter for Estate Manager as Chairman dated 22/11/2022 by Regional General Manager; for harvesting mandore as Employee Representative dated 27/12/2022 by Estate Manager.         Both the estates and mill management conduct regular two-way communication with their employees through the quarterly OSH committee meeting. Among the agenda discussed are:         Confirmation of minutes previous meeting         Workplace inspection report (Workplace inspections are made prior to the ESH meeting)         Accident report         Medical survivaliance & Audio metric         Status of Safety Program & Environmental         First Aid Kit & Fire Extinguishers Report         HIRARC         Complaint from Employee/External Party.         Other matters         Evident from the minutes of ESH Meeting which were properly maintained by respective Operating Unit management, the ESH Meeting were conducted on 3-monthly interval frequency as dated below:		
dated 22/11/2022 by Regional General Manager; for Assistant         Mnager as Secretary dated 27/12/2022 by Estate Manager; for         harvesting mandore as Employee Representative dated         27/12/2022 by Estate Manager.         Both the estates and mill management conduct regular two-way         communication with their employees through the quarterly OSH         communication with their employees through the quarterly OSH         committee meeting. Among the agenda discussed are:         • Confirmation of minutes previous meeting         • Workplace inspection report (Workplace inspections are made         prior to the ESH meeting)         • Accident report         • Medical surveillance & Audio metric         • Status of Safety Program & Environmental         • First Aid Kit & Fire Extinguishers Report         • HIRARC         • Complaint from Employee/External Party.         • Other matters         Evident from the minutes of ESH Meeting which were properly maintained by respective Operating Unit management, the ESH Meeting were conducted on 3-monthly interval frequency as dated below:         • Hadapan Palm Oil Mill: 17/01/2023; 12/07/2023;		
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		maintained by respective Operating Unit management, the ESH Meeting were conducted on 3-monthly interval frequency as dated
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		<ul> <li>Seri Pulai Estate: 13/10/2023; 17/07/2023; 19/04/2023; 20/01/2023</li> </ul>	
		• Kulai Estate: 02/11/2023; 04/08/2023; 08/05/2023; 08/02/2023	
		<ul> <li>CEP Renggam Estate: 07/12/2023; 21/09/2023; 27/06/2023; 28/03/2023</li> </ul>	
		• Layang Estate: 17/11/2023; 18/08/2023; 19/05/2023; 20/02/2023	
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the 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. - Minor compliance -	Accident & emergency procedures were available. Each estate management has formed the ERP team and the organization chart was displayed on notice board for information of the employees. The procedure and signs posted throughout the workplaces available in multi-language that understood by the workers i.e., Malay, English, Urdu, Indonesian, Tamil, etc. Emergency Response Plans are available for Emergency Contact Numbers, Emergency Evacuation, First Aid Locations, Fire Extinguisher Locations, and Emergency Response Plan (Fire, Chemical Spillage, Chemical Contamination, Flood and Accident) and displayed at strategic locations around the mill, estate office and stores. The competent personnel are appointed and trained to be part of the Emergency Response Team. Appointment letters were sighted in both mill and estate respectively. During the interview, the employees can demonstrate a good understanding regarding on the ERP procedure and plan.	Complied
		During the site visit, verified that the first aid box was available at the boiler station, mill workshop, mill loading ramp, nursery area and manuring activity, FFB harvesting activity and loose fruits collection activity. Samples of First Aid box was checked, and contents found to be complete and in usable order during field visit. Workers trained in First Aid were present in the mill and field operations as sampled below:	

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Operating Unit	Certificate No.	Expiry Date
Hadapan Palm Oil Mill	BOFA-HSE-SD1-0024	15-Nov-2024
	BOFA-HSE-SD1-0025	15-Nov-2024
	BOFA-HSE-SD1-0026	15-Nov-2024
	BOFA-HSE-SD1-0027	15-Nov-2024
	BOFA-HSE-SD1-0028	15-Nov-2024
	BOFA-HSE-SD1-0029	15-Nov-2024
Seri Pulai Estate	SD-HSE-BOFA-0413	07-Nov-2025
	SD-HSE-BOFA-0414	07-Nov-2025
Kulai Estate	SD-HSE-BOFA-0411	07-Nov-2025
	SD-HSE-BOFA-0412	07-Nov-2025
CEP Renggam Estate	SD-HSE-BOFA-0409	07-Nov-2025
	SD-HSE-BOFA-0410	07-Nov-2025
Layang Estate	SD-HSE-BOFA-0405	07-Nov-2025
	SD-HSE-BOFA-0406	07-Nov-2025
fire extinguishers and locations, operational a the management also eye wash at strategic	POM and audited estates hose reels found to b and maintained in good of prepared emergency sh c locations (e.g., chem r store, etc.), which nditions.	e located at strated onditions. In addition owers and emergen cal store, laborato
	aid kits, fire extinguishers sh are available and disp	
surrounding office and	stores.	

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		Furthermore, they will review the accident record during quarterly OSH meetings.	
6.7.3	(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. <ul> <li>Critical (Major) compliance -</li> </ul>	Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding SDS, safe working practices and the correct use of PPE. Suitable PPE has been provided to the workers based on the HIRARC established, information in the SDS and CHRA assessor's recommendation. During the site visit, the PPE were adequately implemented, e.g., Sterilizer Station, Press Station, loading ramp, oil room, boiler, manuring, harvesting, and spraying. Based on interviews with workers, each PPE they received was free, and the management did not charge any payments for the PPE. If there is any damage or it is time to change to new PPE, the worker only needs to bring the used PPE to the management and the management will issue new PPE to the worker. This PPE issuance will be recorded by the management. The issuance records of the PPE to the workers were sighted during the audit. Used PPE will be collected by management for disposal. The record for PPE Issuance were sighted. The management provides adequate shower rooms and soap for employees' use after returning from activities involving chemical application. Lockers are also provided for the convenience of employees to keep clean clothes for them to use to go home. To ensure that no PPE is taken home, the management has provided an area to wash and store PPE. Used PPE will be disposed of as scheduled waste, registered as SW410.	Complied
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.	Should there be any medical care needed by the employees, clinics with certified Medical or Hospital Assistants in-charge were provided at all the sampled management units. Based on site visits, all the clinics	Complied

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	- Minor compliance -	were well maintained and managed. Records of medical inventory,	]
		VMO visits and patients treated were made available for verification.	
		All workers, including foreign workers, are covered by SOCSO as evident from the records of SOCSO contribution for Aug-2023, Sept-2023, and Oct-2023.	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	In accordance with the Occupational Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning, and Occupational Disease) Regulations 2004 [NADOPOD], which fall under the purview of the Occupational Safety and Health Act of 1994 (Act 514), it is mandatory for the UoC to submit the JKKP 8 form to the Department of Occupational Safety and Health (JKKP) before January 31st each year.	Complied
		The verification process confirmed that the JKKP 8 reports for each Operating Unit were duly submitted to JKKP in January 2023 for the 2022 report through the MyKKP portal as details below:	
		• Hadapan Palm Oil Mill was submitted the JKKP 8 report on 09/01/2023 (Ref. No. JKKP 8/124488/2022). 1 case reported.	
		• Seri Pulai Estate was submitted the JKKP 8 report on 10/01/2023 (Ref. No. JKKP 8/122178/2022). 5 cases reported.	
		• Kulai Estate was submitted the JKKP 8 report on 16/01/2023 (Ref. No. JKKP 8/124143/2022). 6 cases reported.	
		• CEP Renggam Estate was submitted the JKKP 8 report on 24/01/2023 (Ref. No. JKKP 8/136324/2022). 5 cases reported.	
		• Layang Estate was submitted the JKKP 8 report on 18/01/2023 (Ref. No. JKKP 8/121392/2022). 10 cases reported.	
		It is noteworthy that the MyKKP portal not only facilitates the submission of reports but also provides access to records from the past five calendar years. Furthermore, it was ascertained that each	

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		Operating Unit of the UoC have Time Accident (LTA) metrics.	diligently maintained records on Lost		
Princip	Principle 7: Protect, conserve and enhance ecosystems and the environment				
Criterio	n 7.1: Pests, diseases, weeds and invasive introduced species are effect	tively managed using appropriate I	ntegrated Pest Management (IPM) te	echniques.	
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	continue to implement biological plantation such as leaf eating per the estates include monitoring of for initiation of control measure	•		

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Kulai Estate	
Issue/ Area	Action Plan
Oryctes Rhinoceros Beetle	Spraying using chemical Cypermetryin
	Apply EFB in single layer
	Establishment of thick cover crop
Rodent	Natural predator (Tyto Alba)
Bagworm & Nettle Caterpillar	Planting beneficial plant
	Trunk injection using Acephate
CEP Rengam Estate	
Issue/ Area	Action Plan
Pest - Rat	Install Barn Owl Box (BOB) for Tyto Alba habitat to control rat population.
	Replace damage BOB
	Install BOB at the ration 1:15
Layang Estate	
Issue/ Area	Action Plan
Pest - Rat	Install Barn Owl Box (BOB) for Tyto Alba habitat to control rat population.

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		Beneficial plants such as Turnera subulata and Cassia cobanensis are grown in the estate and their records of planting in new areas and maintenance of existing areas of beneficial plants and location maps are available. Leaf-eating pest census was regularly carried out to obtain information about threshold level and action to be taken thereafter. Census records were available for verification which has shown the effectiveness of the planting of beneficial plants to reduce the leaf eating caterpillars.	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. This is not practiced in the estates visited.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	Interview with the estate management and workers indicated that there was no use of fire as pest control in the estates. Visit around the estate also indicated that there was no evidence of fire being used as the methods of pest control is mainly via pesticide applications and biological controls (IPM).	Complied
Criterio	<b>7.2:</b> Pesticides are used in ways that do not endanger health of worke	ers, families, communities or the environment.	
7.2.1	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01/07/2011. Selected products are specific to the target pest, weed and disease. Among pesticide listed in the procedure are <i>Acephate, Cypermethrin, 2,4-D Methyl Amine, Glufosinate Ammonium, Glyphosate Isopropylamine, Indaziflam, Metsulfuron Methyl, Sodium Chlorate, Triclopyr Butotyl, Propineb, Thiram, Flucoumafen, Walfarin, etc.</i>	Complied

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7.2.2	(C) Records of pesticides use (including active ingredients used and	Records of pesticides used (including active ingredients used and their	Complied
	their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	LD 50, area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate and submitted to the Head	
	- Critical (Major) compliance -	Quarters on a monthly basis. Among the pesticides recorded for the	
		period of Dec 2022 – Nov 2023 are <i>Acephate, Cypermethrin, 2,4-D</i> <i>Methyl Amine, Glufosinate Ammonium, Glyphosate Isopropylamine,</i>	
		Indaziflam, Metsulfuron Methyl, Sodium Chlorate, Triclopyr Butotyl,	
		<i>Propineb, Thiram, Flucoumafen, Walfarin, MSMA, Diuron,</i> and <i>Malathion.</i>	
		Upon examination of the records meticulously maintained by each estate, it has been verified that the recorded pesticides align accurately and correspond with the information documented in both the store card records and the Chemical Register.	
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated	The policy of the estates was to systematically minimize the use of	Complied
	where possible, in accordance with IPM plans. - Critical (Major) compliance -	pesticides in accordance with IPM plan. The estate continues to implement cultural/biological control for the oil palm pest in the	
		plantation such as leaf eating pest and rat. IPM techniques applied at the estate include monitoring of pest numbers and the use of triggers for initiation of control measures.	
		Although there have been no outbreaks of leaf eating pests, beneficial	
		plants are being established along main roads and block boundaries to attract natural predators. The estate has established IPM program. The	
		plan was reviewed on annually basis. The IPM consist of Planting Beneficial Plant, Rat damage census, and Ganoderma census.	
		The pesticide reduction program is monitored on usage per hectare basis.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	Based on the site visit, records review, and interview with chemical handlers, it verified that there was no prophylactic use of pesticides at	Complied
	- Minor compliance -	the estates.	

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7.2.5	<ul> <li>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.</li> <li>The due diligence refers to: <ul> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul> </li> </ul>	Based on documentation reviews (chemical usage records, chemical register, justification of pesticides, chemical bin cards, chemical stock purchase), site visits, and interview with relevant personnel (storekeeper, workers, etc.), it was noted that each estate of SOU 24 – Hadapan Palm Oil Mill & Supply Bases had not use pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and <i>paraquat</i> . Except for <i>2,4-D-Dimethylammonium</i> and <i>Cypermethrin</i> which were Class II chemicals, all others were of Class III & IV. Use of <i>paraquat</i> had been eliminated in accordance with SDP policy and was replaced by a contact or systemic herbicide e.g., <i>Glyphosate Isopropylammonium, Triclopyr-Butotyl, 2,4-D-Dimethylammonium, Indaziflam, Monosodium Methanearsonate (MSMA), Gufosinate Ammonium, Metsulfuron-Methyl, Sodium Chlorate, etc. Monocrotophos</i> was eliminated and in its place, <i>Acephate</i> is used.	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 -	<ul> <li>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estate. Sampled related training records as below:</li> <li>Seri Pulai Estate: Chemical Handling = 20/06/2023; Chemical &amp; Spraying = 17/03/2023;</li> <li>Kulai Estate: Trunk Injection = 09/12/2023; Chemical Handling = 09/12/2023; PPE Management = 18/10/2023; Awareness on RTE species and HCV = 11/10/2023</li> <li>CEP Renggam Estate:</li> <li>Chemical &amp; Waste Management = 17/08/2023; ERP Awareness = 24/08/2023;</li> </ul>	Complied

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		<ul> <li>Layang Estate: Weed Management = 19/07/2023; HCV &amp; RTE Awareness = 18/07/2023; PPE SOP = 18/05/2023</li> </ul>	
		The training includes spraying technique, precautions, and symptoms of toxic reactions such as skin disorders, rashes, mouth, and throat pain, breathing difficulties or nail problems.	
		Appropriate safety and application equipment (safety boots, safety helmets, rubber boots, cartridge masks, safety goggles, gloves, aprons, and raincoat-type long trousers) had been provided and used by the pesticide's operators.	
		All precautions attached to the pesticides (SDS) had been observed, applied, and understood by the workers.	
		During site visit, First Aid Kits were found to be available during pesticides spraying in the fields (4 <sup>th</sup> Schedule) and Portable signboard noted to be displayed at areas of spraying activity (5 <sup>th</sup> Schedule).	
		Programmes and training records verified to be satisfactory.	
		The UoC has adequate facilities for mixing of pesticides and cleaning up after work. There are suitable storage areas for PPE.	
7.2.7	<ul> <li>(C) Storage of all pesticides is in accordance with recognised best practices.</li> <li>- Critical (Major) compliance -</li> </ul>	There are no changes as previous assessment finding. During site verification at store of pesticides were found stored in the mill and estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names.	Complied

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		Chemicals were mixed in the pre-mixing areas of the store that was under lock and key. Emergency shower and eye wash were available at the pesticides store in case of accidents. The water pressure was noted to be sufficient for such purpose. Safety Data Sheets (SDS) were available in the stores. The SDS are in English and Bahasa Malaysia (understood by the workers).	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Each estate of SOU 24 is adopting the procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management, which was established by SDP management. Used pesticide containers were either reused as containers for spraying solution or disposed of as recycled waste. For disposal, empty pesticide containers are triple rinsed and pierced at the bottom, later stored in the empty container store. At respective estate of the UoC, record on the disposal and recycle of pesticide containers was also made available during the audit. Records on the usage and disposal were well recorded and documented. Recyclables sold as scrap to registered recycler company M/X YZ Sxxxx Enterprise by DOE and DOA. Latest disposal conducted in Nov 2023.	Complied
7.2.9	<b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	Based on documentation reviews (chemical usage records, chemical register, justification of pesticides, chemical bin cards, chemical stock purchase), site visits, and interview with relevant personnel (storekeeper, workers, etc.), it was noted that each estate of the UoC had not practicing the aerial spraying.	Complied
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated Critical (Major) compliance -	The chemical handlers for each operating unit of Syarimo POM & Estates Grouping were examined under the Medical Surveillance Programme due to the nature of their work where they are exposed to chemicals that can be hazardous to health as stipulated in the Use and	Complied

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#### Standard of Exposure or Chemicals Hazardous to Health (USECHH) Regulations 2000 under the Occupational Safety & Health Act (OSHA) 1994. Records maintained, showed workers who handled chemicals were sent for medical surveillance: • Hadapan Palm Oil Mill: Conducted by HQ/08/DOC/00/597 dated 05/01/2023 for 30 workers. All fit to work. Seri Pulai Estate: Conducted by HQ/08/DOC/00/597 dated 20/07/2023 for 19 workers. All fit to work. Kulai Estate: Conducted by HQ/08/DOC/00/597 dated 06/07/2023 for 22 workers. All fit to work. • CEP Renggam Estate: Conducted by HQ/08/DOC/00/597 dated 20/09/2023 for 29 workers. All fit to work. • Layang Estate: Conducted by HQ/08/DOC/00/597 dated 03/07/2023 for 15 workers. All fit to work. No abnormalities reported by the Occupational Health Doctor (OHD). The medical reports showed that there was no case of low blood cholinesterase levels. Any worker with such health condition would be declared as unfit for work with pesticides. No such cases in the UoC as at the date of the audit. In addition to the annual medical surveillance, monthly clinical checks (gastrointestinal, urinary system, pregnancy) also carried out by the Medical Health Officer/Assistant on the chemical handlers. Medical surveillance records and monthly health checking records (done at the clinics) were available and satisfactorily maintained. Chemical handlers were interviewed during field visits and feedback received that they did not have any symptoms of toxic reactions such as skin disorders, rashes, mouth, and throat pain, breathing difficulties or nail problems.



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7.2.11	<b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work Critical (Major) compliance -	none of them are l have been identified them for other typ	, based on the new mother that has been identified, handling chemicals. There is evidence that once they ed as pregnant, the management will directly change bes of workers which not related to chemical. It has rmed through interview with sample female workers	Complied
Criterie	on 7.3: Waste is reduced, recycled, reused and disposed of in an environ	mentally and social	ly 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 -	dated May 2022 w Waste manageme Scheduled Wa Hazardous wa Non-Hazardou Industrial was Construction w Agricultural was Office waste General waste Seri Pulai Estate	iste is waste ite waste aste e , Kulai Estate and POM has established Waste n 2023. Among details in the management plan	Non- compliance

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	3. Ensure storage of SW not exceed 180 days
	4. Ensure each SW have labels
	5. Comply to the Environment Quality (SW) Regulation 2005
Industrial waste	1. Liaise with Procurement Department for tendering process to appoint vendor to collect scrap metals
	2. Ensure the contractor to dispose the debris after work completion
	3. Monitoring POME application
Domestic waste	<ol> <li>Identify landfill at least 500m distances from nearest waterways, river</li> </ol>
	<ol><li>Allocate sufficient amount of dustbin at office and housing compound</li></ol>
	3. Collect waste at estate compound at least 3 times a week
	4. Arrange licenced contractors to de sludge septic tank periodically
Operational waste	1. Fertilizer bag re used for loose fruit collection or return to supplier
	2. Old tyres used for landscaping or return to supplier
-	ent plan is developed based on the environmental
	ts assessment. The mitigation measures were then
	-
aspects and impact derived from this destablished to miti	supplier ent plan is developed based on the environmental

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licensed vendors, organic wastes were disposed through government landfill and recyclable wastes were sent to recycle contractors.

All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2023. The waste generated from the mill/estates operations as shown below:

Type of Waste	Item description
Scheduled waste	Used lubricants
	Empty pesticide
	Used batteries
	Clinical waste
Domestic waste	Rubbish from the mill/estate complex and employees' quarters
Sewage	Sewage from housing/office complex

#### Minor NC # 2435775-202312-N1:

Waste Management Plan was not effectively implemented.

(1) Location: Layang Estate

During a site visit to the Landfill area, it was noted that certain waste items from furniture (specifically, metal board and iron) were improperly disposed off. This practice is inconsistent with the Waste Management Plan.

(2) Location: Hadapan Palm Oil Mill and Layang Estate (Hadapan Div.) During a site visit to the Linesite area, it was observed that there was illegal dumping of waste at the back section of

there was illegal dumping of waste at the back section of the labor quarters. This practice is not in compliance with

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		<ul> <li>the Waste Management Plan, specifically under the section on Domestic Waste, which outlines "To collect other domestic waste from office and worker housing complex and bin and dispose of to landfill".</li> <li>(3) Location: Kulai Estate During a site visit at Kelan Division, it was found that a used apron, originally designated for chemical spraying, was found in House No. 207B. In an interview with the employee, it was revealed that the standard protocol involves returning such aprons to the employer for proper disposal. However, in this case, the apron was retained for alternative uses.</li> </ul>	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Procedure of Schedule waste management has been established. Refer Waste Management Procedure for Estates & Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01. Other reference made was Guidelines for Packaging, Labelling and Storage of Scheduled Wastes in Malaysia.	Complied
		Awareness training on Schedule waste has been conducted as per date below:	
		Seri Pulai Estate: 11/05/2023	
		• Kulai Estate: 11/12/2023	
		Hadapan Palm Oil Mill: 17/05/2023	
		Layang Estate: 17/05/2023	
		CEP Rengam Estate: 17/08/2023	
		Generally, the workers have demonstrated good understanding in proper disposal of wastes.	

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Record of Inventory of Schedule Waste and Disposal Record as per
details below:
Seri Pulai Estate
Inventory
File reference Number: JAS.JHQ.600-XXXXXXX
Date Reporting: 10/12/2023
Waste Generated: SW305, SW404, SW409.
Disposal
Sample 1
Disposal consignment note: 2023091112FLRPG.
• Date Disposal: 11/09/2023
SW305 – Used Oil, 0.1600 MT disposed by RXXXXX MXXX Sdn Bhd
Kulai Estate
Inventory
File reference Number: AS(B)J31/152/000/XXX
Date Reporting: 12/12/2023
• Waste Generated: SW305, SW404, SW410, SW410.
Disposal
Sample 1
Disposal consignment note: 202310091542A1RK.
Date Disposal: 09/10/2023
SW 305 – Spent Lubricant, 0.5691 MT disposed by PXXXXXXXX     SXXXXXXX BXXX
Hadapan Palm Oil Mill

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Inventory	
File reference Number: JAS.JKL.600-3/1/XX	
Date Reporting: 13/12/2023	
Waste Generated: SW110, SW306, SW409, SW410.	
Disposal	
Sample 1	
Disposal consignment note: 20231019123U9X10.	
Date Disposal: 19/10/2023	
• SW 410 – Spent Rags, 0.1600 MT disposed by KXXXXXXX AXXX	
Sdn Bhd	
Sample 2	
Disposal consignment note: 2023101912EJN6LX.	
Date Disposal: 19/10/2023	
• SW 409 – Contaminated Container, 0.2104 MT disposed by	
KXXXXXX AXXX Sdn Bhd	
CEP Rengam Estate	
Inventory	
File reference Number: AS(B)J31/152/000/XXX	
Date Reporting: 12/12/2023	
Waste Generated: SW305, SW404, SW410, SW410.	
Disposal	
Sample 1	
Disposal consignment note: 2023120616CK8VQB.	
 Date Disposal: 06/12/2023	

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		<ul> <li>SW 404 - Clinical Waste, 0.0012 MT disposed by FXXXXX NXX Sdn Bhd</li> <li><u>Layang Estate</u> <u>Inventory</u></li> <li>File reference Number: Clinical Waste Inventory SW404 FY2023- 2024</li> <li>Date Reporting: 14/12/2023</li> <li>Waste Generated: SW404.</li> <li><u>Disposal</u></li> </ul>	
		<ul><li>Sample 1</li><li>Disposal consignment note: 34589.</li><li>Date Disposal: 06/12/2023</li></ul>	
		• SW 410 – Inner Plastic Bag, 0.220 MT disposed by RXXXXX MXXX Sdn Bhd	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Not sighted any open burning as per visit to the estates field and housing compound in SOU 24 – Hadapan Palm Oil Mill & Supply Bases confirmed that no open fire was been use for waste disposal. Sime Darby Plantation Berhad has a policy of no open burning. As advocated, the estate practiced zero burning. In the replants visited during the audit in the Estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.	Complied
		There was no evidence of fire used for waste disposal estate visited. Domestic waste was collected and disposed at Municipal Council bin for Hadapan Palm Oil Mill and Seri Pulai Estate. For CEP Rengam Estate	

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		below:			
		Estate	Field	Date Open	
		Seri Pulai	P00	09/12/2023	
		CEP Rengam Estate	P96	11/12/2023	
		Layang Estate	P05B	09/12/2023	
Criterior	<b>n 7.4:</b> Practices maintain soil fertility at, or where possible improve soil	fertility to, a level that e	ensures optimal and su	istained yield.	
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	contains Standard O managed to a level that Estates operate in a standard operating monitored by estate of The recommendation sustainable practices monitored on a yearl given by the agronom Section 8 Rev: 02 Iss fertilizer application for gives the guideline to dosage and placement The sustaining of the	perating Procedures t t ensures optimal and a accordance with the procedures. The pro- operation managemen s for improvements. Leaf analysis and y basis. Variable dosa ist for fertilizer input for sue date: June 2021 or both immature and ype of fertilizers to b t. soil fertility is guided	group agriculture manual to ensure soil fertility is sustained yield. All sample Agriculture Manual and actices are consistently t and the regional office. are given to maintain foliar sampling will be age recommendation was or all sample Estates. ARM covers the procedure for d mature. The procedure e used, timing to apply, by the organization SOPs ctions of the following	
		documents:		-	
		a) EQMS chapter B8 -		ops	
		<ul> <li>b) EQMS chapter B14</li> <li>c) ARM Section 8 – Ma</li> </ul>	•		

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7.4.2	Periodic tissue and soil sampling is carried out by Companies to	Periodic foliar sampling analysis was last conducted in 2022 for the	Complied
	monitor and manage changes in soil fertility and plant health.	sampled estates to monitor the changes in nutrient status. The results	
	- Minor compliance -	of the analysis were used by the agronomist for their recommendation for fertilizers applications programmed. The soil analysis is done once	
		in 5 years. This analysis was followed as per Sustainable Plantation	
		Management System (SPMS) Appendix 11 Ver. 1, under SOP for taking	
		Soil samples dated 01/08/2009. Analysis reports were made available for verification as per below:	
		(1) <u>Seri Pulai Estate</u>	
		Soil analysis conducted by Principal Chemist II from Sime Darby Research Sdn Bhd dated 20/05/2022 as per Soil Analysis Test report no. S34/2022 in Seri Pulai Estate.	
		Foliar analysis conducted by Principal Chemist II from Sime Darby Research Sdn Bhd dated 02/05/2023 as per Foliar Analysis Test report no. P139/2023 in Seri Pulai Estate.	
		(2) <u>Kulai Estate</u>	
		Soil analysis conducted by Principal Chemist II from Sime Darby Research Sdn Bhd dated 20/12/2022 as per Soil Analysis Test report no. 246/2023 in Kulai Estate.	
		Foliar analysis conducted by Principal Chemist II from Sime Darby Research Sdn Bhd dated 10/08/2023 as per Foliar Analysis Test report no. P369/2023 in Kulai Estate.	
		(3) <u>CEP Rengam Estate</u>	
		Soil analysis conducted by Principal Chemist II from Sime Darby Research Sdn Bhd dated April 2023 and report were in progress. Previous report sighted dated 06/09/2018 with reference number S61/2018.	

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		Research Sdn Bhd dated 18 report no. P225/2023 in Kula (4) <u>Layang Estate</u> Soil analysis conducted by Research Sdn Bhd dated 1 report no. S38/2023 in Kulai Foliar analysis conducted by	Chief Chemist II from Sime Darby 7/06/2022 as per Soil Analysis Test Estate. Principal Chemist II from Sime Darby /06/2023 as per Foliar Analysis Test	
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 -	EFB application is done as par recorded regularly. All EFB were The best practice of EFB application were available for verification. Ba the EFB application rate per heo record below: <u>Seri Pulai Estate</u>	Complied	
		Field	Total MT Applied	
		2016A	401.63	
		2005	3963.00	
		Kulai Estate		
		Field	Total MT Applied	
		2010	187.88	
		2011E	169.02	
		Layang Estate		

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r						1		
		Field		Total	MT Applied			
		2011A		841.3	9			
		2010A		745.5	2			
		as per "Jadua was maintai discharge. Re dated 23/03/ EFB manage reference nu	al Pematuhan' ned at Mill efer Report fro 2023 with refe ment was ac	Y No:006385. has conduct m Sime Darby erence number ccording to J 2. Monthly i	Signage on " ed water sa / Plantation R er EP170/202 adual Pemat	row after treate Takat Pelepasa ampling at fin Research Sdn Bł 3. tuhan DOE wi EFB has bee	n″ nal hd ith	
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. The fertiliser application records were available at the estate visited for review. The estate reported the fertilised application to the Agronomist Department. Refer 2023/2024 Fertiliser Programme and Application Record. Sample of fertilizer programme and application record as table below: Seri Pulai Estate					Complied	
		Field	Fertilizer	Amount	Program	Status		
		2003A	Kieserite	11.03 MT	June	Completed		
		Kulai Estate				·		
		Field	Fertilizer	Amount	Program	Status		
		2013A	NKC	19.48 MT	August	Completed		
		2010	RP	19.32 MT	July	Completed		

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		Layang Estat	<u>e</u>	ſ		1	
		Field	Fertilizer	Amount	Program	Status	
		2004	Kieserite	8.14 MT	March	Completed	
		CEP Rengam	Estate				
		Field	Fertilizer	Amount	Program	Status	
		2005	NKC1	30.82 MT	January	Completed	
		2011B	Kieserite	19.42 MT	May	Completed	
Criterio	<b>n 7.5:</b> Practices minimise and control erosion and degradation of soils.					<u>.</u>	
7.5.1       (C) Maps identifying marginal and fragile soils, including steep terrain, are available.       Maps identifying marginal and fragile soil, including steep terrain, available for verification. They were prepared by R&D-TTAS Precisi Agriculture Unit.         Seri Pulai Estate							
		Soil Type		Perce	ntage, %		
		Bungor		33.32			
		Rengam		5.45			
		Alma		5.12			
		Gong Chena	ık	6.65			
		Durian		23.60			
		Gali		6.01			
		Organic Cla	Ý	12.12			
		Batu Anam		0.84			
		Gondang		3.78			
		Kuah		2.07			

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Masai	1.05
<u>Kulai Estate</u>	
Soil Type	Percentage, %
Yong Peng, Jerangau, Rengam	78.00
Local Alluvium, Organic Clay	2.00
Bukit Temiang, Kampung Kubor, Pelepah, Tepus, Kulai	17.00
Masai	2.00
CEP Rengam Estate	Dercentage 0/
Soil Type	Percentage, %
Bungor	3.51
Jerangau	6.94
Munchong	0.27
Rengam	68.46
Local Alluvium	10.13
Organic Clay	4.70
Tampin	1.22
Bukit Lunchu	3.25
Bukit Temiang	0.20
Pelepah	0.53
Masai	0.79
Layang Estate (Hadapan Division)	

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			1		<b>1</b> 1	
		Soil Type		Percentage, %		
		Harimau		56.51		
		Kelau		3.71		
		Local Alluvium		20.58		
		Rengam	I	5.96		
		Based on the ver marginal or fragile		no soils in the table classified	as	
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 -	Addressed in the Quality Policy Sta 2/12/2019 and F Protect and conse "3.1.2 - Managem reserves within o Stated in the Envi degree and mark degree.	on 3.1 ws: ver ns". 25	Complied		
		Record verification	· · ·		-   r	
		Estate	Degree	Hectarage	+	
		Seri Pulai Estate	0°-2°	40.75	+	
			2°-6°	37.98		
			6°-12°	15.82	4	
			12°-20°	4.40	4	
			<25°	0.84		
		Kulai Estate	0°-2°	29.86		
			2°-6°	52.80		
			6°-12°	13.18		

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			12°-20°	2.75			
			<25°	1.13			
		Layang Estate	0°-2°	41.85			
		(Hadapan	2°-6°	52.03			
		Division)	6°-12°	5.75			
			12°-20°	0.27			
			<25°	0.11			
		CEP Rengam	0°-2°	70.30			
		Estate	2°-6°	19.22			
			6°-12°	7.95			
			12°-20°	2.52			
			<25°	0.00			
		degradation of so EFB application, a road maintenance Cover crops were The cover crop f	ils were in place voidance of blan and maintenand planted in the r Mucuna Bractea ement. Large ar	b minimize and control erosion and e through proper stacking of fronds, nket spraying, construction terraces, ce of soft vegetation in the interlines. eplants and in certain mature areas. Ita had been planted along crucial eas with Neprolepis Biserrata in the e visit.			
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -		ng Estate, it wa	Estate, Kulai Estate, CEP Rengam as verified that there was no new eep terrain.	Complied		
	<b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.						



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7.6.1	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	No new plantings in Seri Pulai Estate. Soil series and topography maps were available for the estate. No marginal or fragile soil categorized in the estate as per soil map issued by R&D Precision Agriculture Unit.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	No new plantings in Estate. Addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 02/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest: – "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.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	No new plantings in Seri Pulai Estate. As per slope map prepared by R&D-TTAS Precision Agriculture Unit dated November 2018, topography information Seri Pulai Estate and Kulai Estate was available as verified under indicator 7.5.2.	Complied
Criterio	<b>7.7:</b> No new planting on peat, regardless of depth after 15 November	2018 and all peatlands are managed responsibly.	
7.7.1	<ul> <li>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</li> <li>- Critical (Major) compliance -</li> </ul>	There is no new planting on after 15 November 2018 in existing and new development areas at all the sampled estates.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. <b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	The currently planted palms cover a total area of 205.60 hectares (10.20%), situated on peat soil. The survey classifies the area as flat terrain, predominantly featuring a slope class of less than 2 degrees. The peat soil map, created on May 24, 2019, at a scale of 1:22,000 by the R&D Precision Agriculture Unit, indicates that the peat is located in the northern and western parts of the estate. The peat depth varies	Complied

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	- Minor compliance -	from moderately deep to deep, exhibiting sapric condition, with an organic matter layer exceeding 50cm. On November 14, 2019, the Group Sustainability Department of SDPB submitted a verified email to the RSPO Secretariat, notifying them about the peat inventory for all Sime Darby Estates in Malaysia. Peat soil was identified in the Seri Pulai Estate, specifically in the northern and western parts, covering approximately 205.619 hectares. The submission included supporting documents such as an inventory table with information about estate names and peat area sizes, as well as a location map of the peat area. The second submission for the peat inventory has been sent to RSPO on 09/11/2023 and acknowledge by RSPO on 20/11/2023. Sighted evidence of correspondence email between Sime Darby Plantation Berhad with RSPO.	
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	The Seri Pulai Estate possesses a map indicating the locations of subsidence poles. Estate management has adhered to the recommendations from GSD and met RSPO requirements concerning the monitoring of subsidence in peat areas. A site visit to Block 2003A and 2013A revealed that the subsidence pole was diligently maintained, and the subsidence readings were promptly updated. Refer Piezometer Reading as at Nov 2023, Peat Subsidence Pole Reading as at Nov 2023 and Water Table Tube Monitoring as at Nov 2023.	Complied
7.7.4	<ul> <li>(C) A documented water and ground cover management programme is in place.</li> <li>- Critical (Major) compliance -</li> </ul>	Referring to the Peat soil verification report at Seri Pulai Estate, conducted by PRA_RGSA (Soil Unit) on May 15, 2019, a recommendation was issued to the estate management. The suggestion was to install both piezometers (water table tubes) and peat subsidence poles in the field. For water level monitoring, a water level marker needed to be placed at the outlet, maintaining the water at a range of $40 - 60$ cm from the soil surface.	Complied

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		The estate management has implemented the installation of the piezometer at the collection drain, and the water level is regularly monitored on a monthly basis. The records of water table monitoring for the year 2022 and 2023, prepared by the Assistant Manager and verified by the Estate Manager, have been examined. It is confirmed that the readings of the water level consistently fall within the optimum range of $40 - 60$ cm. Refer Piezometer Reading as at Nov 2023, Peat Subsidence Pole Reading as at Nov 2023 and Water Table Tube Monitoring as at Nov 2023.	
7.7.5	<ul> <li>(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.</li> <li>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</li> <li>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</li> <li>Critical (Major) compliance -</li> </ul>	<ul> <li>According to the replanting program, the current peat area that is cultivated with oil palm is scheduled for replanting 0n 2028 based on LRRP record. Details field involve were:</li> <li>2003B - 62.76 Ha</li> <li>2005A - 56.27 Ha</li> <li>Refer email communication with Group Sustainability - Conservation &amp; Biodiversity Units with Manager Seri Pulai Estate dated 20/07/2023, 05/12/2023 and 06/12/2023 title Durability Assessment Seri Pulai Estate. As per latest updates stated, "Planned to complete the data collection and finalised the report by this December 2023".</li> </ul>	Complied
7.7.6	<b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -	The estate has adhered to RSPO requirements by installing both Piezometers and Peat Subsidence Poles in the field. These instruments have been clearly marked and positioned within accessible proximity (3 palms away from the main road). Additionally, the estate has set up	Complied

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7.7.7	(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. - Critical (Major) compliance -	water level at a range of 40 to 6 Peatland conservation areas wer the estates. However, efforts moisture, and natural water Rehabilitation measures have b	re not identified during visits to any of have been made to preserve peat r regimes are closely monitored. been implemented, showcasing a fire I revegetation of both secondary and	Complied
Criterie	on 7.8: Practices maintain the quality and availability of surface and grou	indwater.		
7.8.1	<ul> <li>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:</li> <li>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</li> <li>b) Workers have adequate access to clean water.</li> <li>Minor compliance -</li> </ul>	<ul> <li>for year 2023 which was devalability of natural water reefficient water consumption throe</li> <li>Evaluation of water consum</li> <li>Monitoring of negative impa</li> <li>Steps to optimize water methods.</li> <li>Control of fertility and soil methods</li> <li>Monitoring of water managed</li> </ul>	ption and water sources. In the environment. Consumption through water saving moisture.	Complied

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#### Estate Water Treatment Plant Water supply to be purchased from Syarikat Air Johor To conduct water sampling on the polluted water and initiate an action plan for the water treatment Wastewater Pre Mixing area To Monitor the usage of Daily consumption record, treated water on monthly basis rainwater harvesting at workshop, office, store, nursery Hadapan Palm Oil Mill Issue / Area Action Plan Wet Cleaning at process area To ensure wet cleaning using water jet Dilution water at press To control dilution rate during process Fishpond at AP and Gazebo To use circulation water only Water shortage Implement rainwater harvesting Severe water pollution Decontaminate pond by flushing water and chemical treatment 7.8.2 (C) Water courses and wetlands are protected, including maintaining From the verification was done through site visit, interview and Complied and restoring appropriate riparian and other buffer zones in line with document review, it was confirmed that water courses and wetlands 'RSPO Manual on BMPs for the management and rehabilitation of are protected, including maintaining and restoring appropriate riparian riparian reserves' (April 2017) or applicable National legislation or and other buffer zones in line with 'RSPO Manual on BMPs for the specific environmental permit. Smallholders may replant existing management and rehabilitation of riparian reserves' (April 2017).

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planted areas provided there is no evidence of environmental	Monitoring was done by water sampling conducted by the certification
deterioration having occurred during the previous cycle.	units.
- Critical (Major) compliance -	Water sampling was conducted by quarterly basis base on Sustainable
	Plantation Management System (SPMS) Appendix 7 Standard
	Operating Procedure (SOP) for Water Quality Monitoring dated
	01/06/2016. Water sampling conducted by water and wastewater lab,
	Sime Darby Research Sdn Bhd.
	<u>Seri Pulai Estate</u>
	<ul> <li>River water analysis was conducted on 08/11/2023. Refer report with refence number IE1467/2023. Sample taken for Point 1 to Point 6.</li> </ul>
	<ul> <li>Domestic water analysis was conducted on 17/11/2023. Refer report with reference number IE1568/2023. Sample taken for Raw water pond, Linesite.</li> </ul>
	Kulai Estate
	<ul> <li>River water analysis was conducted on 08/08/2023. Refer report with refence number IE1241/2023. Sample taken for Midstream, Downstream and Boundary Estate.</li> </ul>
	<ul> <li>Domestic water analysis was not conducted due to water source from Syarikat Air Johor.</li> </ul>
	Hadapan Palm Oil Mill
	<ul> <li>River water analysis was conducted on 07/11/2023. Refer report with refence number IE1559/2023. Sample taken for Sunagi Siam and Anak Sungai Field P04.</li> </ul>

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		<ul> <li>Treated Effluent analysis was conducted on 13/10/2023. Refer report with reference number IE567/2023. Sample taken for Treated Effluent.</li> <li>Effluent analysis was conducted on 17/10/2023. Refer report with reference number IE600/2023. Sample taken for Effluent.</li> <li>Layang Estate</li> <li>Midstream analysis was conducted on 20/09/2023. Refer report with refence number IE1224/2023. Sample taken for Midstream 22A/3 and 02C/5.</li> </ul>				
		For CEP Rengam Estate, there is no water sampling required since domestic water under SAJ and no natural water ways trespassing the estate. Awareness signage has been placed at the strategic area for example main gate and buffer zone area. Training has been communicated with workers during muster call and affected stakeholders during stakeholder meeting.				
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly reports were submitted to DOE accordingly. Reviewed the Quarterly Return Form to DOE as follows:				omplied
		Report Date 09/10/2023	Quarter/Week 1 <sup>st</sup> week/1 <sup>st</sup> month	BOD (Limit=2500 mg/L) 119.00		
			5 <sup>th</sup> week/2 <sup>nd</sup> Month	310.00		
			9 <sup>th</sup> week/3 <sup>rd</sup> Month	146.00		
		14/04/2023	1 <sup>st</sup> week/1 <sup>st</sup> month	121.00		
			5 <sup>th</sup> week/2 <sup>nd</sup> Month	128.00		
			9 <sup>th</sup> week/3 <sup>rd</sup> Month	132.00		

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		as per "Jadual was maintaine	1 <sup>st</sup> week/1 <sup>st</sup> mont 5 <sup>th</sup> week/2 <sup>nd</sup> Mont 9 <sup>th</sup> week/3 <sup>rd</sup> Mont Oil Mill discharge Pematuhan" No:00 ed at Mill has co er Report from Sime	th 1: th 9 POME through F 6385. Signage of ponducted water	n "Takat Pelepas sampling at fi	an" inal	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	which are reco water catchme with volume of	ained monitoring rded monthly. Wat nt by using pump. FFB process. Refer le data as below: FFB Processed	er for processing The trend of wat	g is abstracted fr ter usage is tand	rom lem	Complied
		2022	154,629.34 MT	173,265.00 L	Processed 1.12 L/MT		
Criterio	<b>n 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is op	otimised	· · · · ·				
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 -	and has been 2023. The doct the Energy Ma i) Create awa saving elec	,	he Environmenta d/updated on Ja re: ff/ workers rega	Il Management F nuary 2023. Amo rding importance	Plan ong e of	Complied
		for facilities	g / awareness stick s / equipment after the fluorescent lam	being used or n	ot being used.		

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				I
iv) Worker's h	ousing inspection	n to ensure no ill	legal wiring	
v) Preventive	maintenance pro	ogramme for est	ate vehicles	
vi) Training / E	Educate workers	on fuel saving p	practices	
vii) Regular r recomment		f transport @	) machine as p	ber
fibre/shell prod	uced from the m	ill as part of the	talize the utilisation ir energy production nology limitation.	
			usage per ton F the data To date 20	
Estate / Mill	Diesel, (MT)	FFB / CPO, (MT)	Diesel / FFB / CPO (MT)	
Seri Pulai Estate	32,557.00	24,752.40	1.31	
Kulai Estate	50,163.00	26,460.00	1.90	
Hadapan Palm Oil Mill	46,179.04	29,395.41	1.57	
Layang Estate	98,138.00	33,214.43	2.95	
CEP Rengam Estate	62,824.00	31,527.63	1.99	
		diesel/FFB was rtilizer applicatio	high due to addition on using MTFA.	nal

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		At the mill, the utilisation of fibre and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.				
	Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new develor 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 -	<ul> <li>Both the mill and the estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and field operation. The management from both estate and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adversely impact the environment.</li> <li>Fuel Consumption, POME and reported in the Palm GHG Summary Report. The consumption of fertilisers and diesel were verified through Estates:</li> <li>FFB record book</li> <li>Stock book</li> <li>Monthly stock issue</li> </ul>	Complied			
		<ul> <li>Monthly stock issue</li> <li>Stock requisition note Mill</li> <li>Mill Month End Production Report</li> <li>Monthly production report</li> <li>Flowmeter &amp; running hours record book</li> <li>Effluent analysis report Based on the verification of records; all the sampled issuance was traceable.</li> <li>Among the plan for GHG Reduction Plan As Below:</li> <li>Optimization of diesel usage for the tractor available</li> <li>Monitoring on the usage of diesel use</li> </ul>				

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		<ul> <li>to reduce direct co</li> <li>To ensure all cher in compliance with</li> <li>Fertilizer input for</li> <li>To ensure that all are in similar with</li> </ul>	ontamination to the granical dosage and prace the procedure nutrient enhancement chemical dosage and the recommendation.	tical implementation area	
7.10.2	<ul> <li>(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).</li> <li>- Critical (Major) compliance -</li> </ul>	Not applicable since no	o new development by	the certification unit.	Not Applicable
7.10.3	<ul> <li>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</li> <li>- Critical (Major) compliance -</li> </ul>	contributes significant	Assessment for ide t impact to environ	was conducted under entifying activities that ment including gaseous entive action Plan FY 2023	Complied
		Issue	Objective	Action Plan	
		Replanting	To minimize soil erosion	To plant LCC, road pit	
			To prevent the destruction to riparian	To demarcate the area	

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		T
Workshop	To comply with EQA	To ensure all SW
	(Schedule waste	must be accordance
	regulation	with legal
		requirement
		Provide regular
		inspection for
		estate vehicle for
		operation purpose
		To maintain oil trap
		as to prevent oil
		spillage and to
		provide proper spill
		kit
Spraying activity	To ensure the	To provide tray and
	activity do not	prevent direct
	pollute the	contact to soil
	environment	To conduct regular
		inspection on
		equipment for
		spraying
Landfill	To ensure proper	To educate workers
	landfill	on the recycling for
	management in	domestic waste
	accordance to SOP	To ensure domestic
		waste are buried
		properly as per SOP
		Landfill
		To engage vendor
		for disposing
		domestic waste

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WorkershousingTo enscomplexburningworkercomplex	s housing Weekly housing	
Mill		
Environmental issue	Action Plan	
To reduce black smoke emitte to air	ed To ensure furnace draft variance – 50hmg inside furnace for better combustion	
	Frequent cleaning inside furnace area	
To reduce risk of POM discharge at water ways	1E To check the condition of furrow and ensure not overflowing	
	To ensure maintenance of the fire bar and moving gate are in order.	
To reduce massive lar contamination at the landf area	5	
Implementation of plan is be charge with target of time fram	ing monitored by appointed person ir ne for completion.	1
	mpliance Schedule, the mill is obliged to um once a year. Below are the verified ng Report):	
Fume Hood 1		
• Report no.: AE/23/170N		
• Report date: 17/07/2023 8	& 08/08/2023	

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	• Result: Dust: 1.5408 mg/m3 (B5) vs limit 150
	Fume Hood 2
	Report no.: AE/23/170N
	<ul> <li>Report date: 17/07/2023 &amp; 08/08/2023</li> </ul>
	<ul> <li>Result: Dust: 0.1538 mg/m3 (B5) vs limit 150</li> </ul>
	Chimney 1
	Report no.: AE/23/170N
	<ul> <li>Report date: 17/07/2023 &amp; 08/08/2023</li> </ul>
	<ul> <li>Result: Dust: 0.1548 mg/m3 (B5) vs limit 50</li> </ul>
	For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring. Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored.
	Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Jadual Pematuhan JAS.JHQ.600-3/1/16(SK03) Licence No: 006385.
	Periodic Inspection, Testing & Examination Of Engineering Control Equipment has been done on 20/06/2023 with report reference number HQ/16/JHIL/00/112-23(09).
	Environmental audit by 3 <sup>rd</sup> party has been conducted annually by Assessor with reference number ECAR_KKDHadapan_240523 dated 24/05/2023.
	EFB Report to DOE has been submitted on 16/11/2023.
	Latest DOE visit was sighted on 09/08/2023. Sighted reports details and no issue has been raised.
Criterion 7.11: Fire is not used for preparing land and is prevented in the mana	aged area

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7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Visit to the replanting areas in Seri Pulai Estates and Kulai Estate confirmed that the land for replanting is not prepared by burning. Interview with the workers and management indicated that they do not prepare land for replating by burning. Verification through document review, interview and site visit confirmed that there is no replanting prepared by burning. Refer Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law – EQA and Regulations 1974. No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Fire prevention measure has been established. Refer Emergency Preparedness and Response Procedures. Refer document no. UM/HSE/SP/02. Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire is detected, inform estate. Sime Darby was engaged the Smart Hotspot Alert that monitored by satellite VIIRS for fire prevention. Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data. Refer https://simedarbyplantation.com/who-we-are/sime-darby-plantation- worldwide/hotspot-dashboard/ The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	There is evidence that management has engaged with stakeholders regarding on fire prevention and control measures.	Complied

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#### - Minor compliance -(1) Seri Pulai Estate: Refer Stakeholder meeting dated 20/11/2023. Refer Section 7.0 stated details on Fire Prevention. (2) Kulai Estate: Refer Stakeholder meeting dated 14.09/2023. Refer Section 5.0 stated details on Fire Prevention. (3) CEP Rengam Estate: Refer Stakeholder meeting dated 11/10/2023. Refer Section on Fire Prevention. (4) Layang Estate: Refer Stakeholder meeting dated 24/08/2023. Refer Section on Fire Prevention. 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. (C) Land clearing since November 2005 has not damaged primary Not Applicable 7.12.1 Certification Unit and supply base did not carry out any new plantings forest or any area required to protect or enhance HCVs. Land clearing since November 2005. Therefore, this indicator is not applicable during since 15 November 2018 has not damaged HCVs or HCS forests. this assessment. The immature areas are of replanted area. 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 -(C) HCVs, HCS forests and other conservation areas are identified as The reassessment on the HCV area in SOU 24 has been conducted in Complied 7.12.2 follows: January 2021. Refer Addendum to HCV Re-Assessment Report for SOU 24 – Hadapan Palm Oil Mill & Supply Bases prepared by Conservation a) For existing plantations with an HCV assessment conducted by an & Biodiversity Unit, Group Sustainability Department, Sime Darby RSPO-approved assessor and no new land clearing after 15 Plantation Berhad January 2021. November 2018, the current HCV assessment of those plantations remains valid. Identified HCV Hectarage, Ha Estate b) Any new land clearing (in existing plantations or new plantings) Seri Pulai Sq Ayer Hitam 27.61 after 15 November 2018 is preceded by an HCV-HCS assessment, Reserve using the HCSA Toolkit and the HCV-HCSA Assessment Manual. Kulai Estate Water Catchment 0.77 This will include stakeholder consultation and take into account Layang Estate Mill Pond 6.02 wider landscape-level considerations. 7.19 CEP Rengam Estate Water Catchment

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	<ul> <li><b>PROCEDURAL NOTE:</b></li> <li>Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</li> <li>- Critical (Major) compliance -</li> </ul>	As per site verification with land statement and interview with stakeholder no new planting was available in sample estate.		
7.12.3	Indicator is not applicable in Malaysia context	Not Applicable		Not Applicable
7.12.4	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	No new planting after 15 November 2018 within SOU 24. Base on the HCV identified in the report, the estate has established management plan for the year 2023. Review on HCV Management Plan Seri Pulai Estate and Kulai Estate has been done on January 2023. Reviewed the implementation of the management plan as follows: <u>Seri Pulai Estate</u>		Complied
		Issue / Area	Action Plan	
		Sg Ayer Hitam Reserve	Conduct periodic water sampling and water quality	
			Conduct Regular patrolling and monitoring	
			Demarcate the area clearly	
			Install awareness signage	
		RTE Species	Conduct HCV Training to the workers	
		Kulai Estate		
		Issue / Area	Action Plan	
		Water Catchment	To give training to workers on awareness of HCV	
			Ensure workers do not burn their wastes and no open burning occurs within the area.	

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		Biodiversity and HCV Areas were 02/12/2023, Kulai Estate on 07/12/2023, and CEP Rengam awareness training on HCV and	To educate workers about HCV area         Ensure Regular Patrol         Action Plan         To ensure the signage is maintain at site and retrievable on map         Po promote awareness on HCV         To manage human wildlife         To maintain/enhance the biodiversity in the estate.         mal Sighting was done. Monitoring of e recorded, i.e., Seri Pulai Estate: on 03/12/2023, Layang Estate on Estate on 05/12/2023, Layang Estate on 19/10/2023, Layang Estate on 19/10/2023, Layang Estate on 19/10/2023, Layang Estate on 24/08/2023.	
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 -	of local communities been identif November 2018, peat land and Assessment report indicated that	ous year record. There were no rights fied in HCV areas, HCS forest after 15 other conservation areas. The HCV there is no threatened or endangered sent or are affected by plantation or	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme		there was no RTE species found in all monitoring plan of wildlife was	Complied

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	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 -	established and implemented. Education about the status of RTE has been given to workforce through a muster briefing from time to time. Signage to restrict hunting and intrusion have been put up at many places at the estates especially at the points of entry to create awareness among the workers and surrounding communities.	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	Educational activities on RTE species were done through a few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of hunting or endangering the RTE species. Sighted the management also conducted the RTE monitoring. Refer HCV monitoring latest record for the month of December 2023.	Complied
7.12.8	<b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 24 estates. There is no land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018. Hence, the requirement under this indicator does not apply.	Complied

#### **Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2022** for **SOU 24 – Hadapan Palm Oil Mill & Supply Bases** was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2022** for **SOU 24 – Hadapan Palm Oil Mill & Supply Bases** are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
СРО	1.24
РКО	1.24

Production	t/yr
FFB Process	154,509.34
CPO Produced	29,414.60
PKO Produced	7,390.48

Extraction	%
OER	19.04
KER	4.78

Land Use	На
OP Planted Area	20,217.46
OP Planted on peat	205.48
Conservation (forested)	0.00
Conservation (non-forested)	88.32
Total	20,511.26

#### **Summary of Field Emission and Sink**

	Own Cr	op*	Gro	up	3 <sup>rd</sup> Pa	arty	Tota	ıl
	tCO2e	tCO2e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB
			Emissio	n				
Land Conversion	90,521.90	0.82	3,656.86	0.47	0.00	0.00	94,178.77	0.00
CO <sub>2</sub> Emission from fertilizer	11,299.87	0.10	888.04	0.11	0.00	0.00	12,187.90	0.00
NO <sub>2</sub> Emission	1,465.85	0.05	0.00	0.00	0.00	0.00	1,465.85	0.00
Fuel Consumption	32.27	0.00	2.86	0.00	0.00	0.00	35.13	0.00
Peat Oxidation	10,691.66	1.04	0.00	0.00	0.00	0.00	10,691.66	0.00
			Sink					
Crop Sequestration	-84,013.59	-0.76	-3,426.47	-0.44	0.00	0.00	-87,440.05	0.00
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	35,604.48	0.32	1,550.23	0.20	0.00	0.00	45,638.92	0.00

\*Note: Includes both estates and smallholders

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#### **Summary of Mill Emission and Credit**

	tCO2e	tCO <sub>2</sub> e/tFFB
Emission		· ·
POME	0.00	0.00
Fuel Consumption	7.99	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	7.99	0.00

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

Emissions	tCO2e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

\*This mill has no kernel crusher operation.

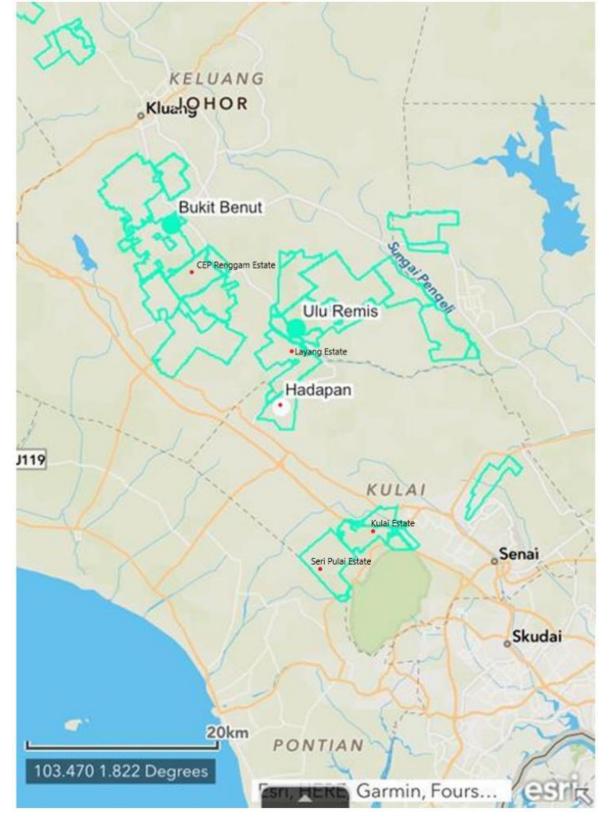
Palm Oil Mill Effluent (POME) Treatment:		
Divert to Compost (%) 0.00		
Divert to anaerobic diversion (%)	100	

POME Diverted to Anaerobic Digestion:		
Divert to anaerobic pond (%)	4.17	
Divert to methane captured (flaring) (%)	5.08	
Divert to methane captured (energy generation) (%)	90.75	



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

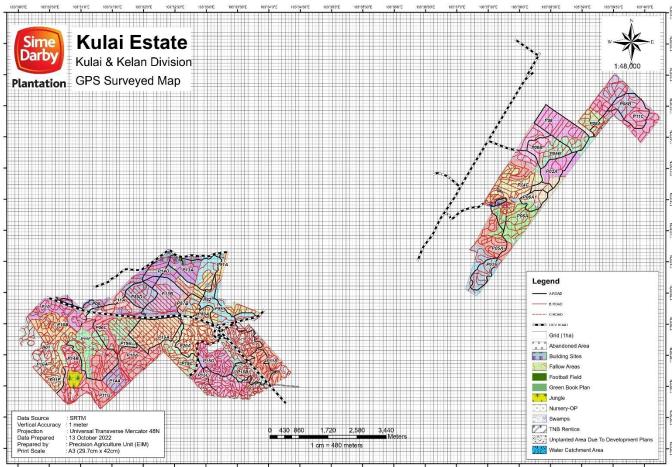


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#### **Appendix D: Estate Field Map**

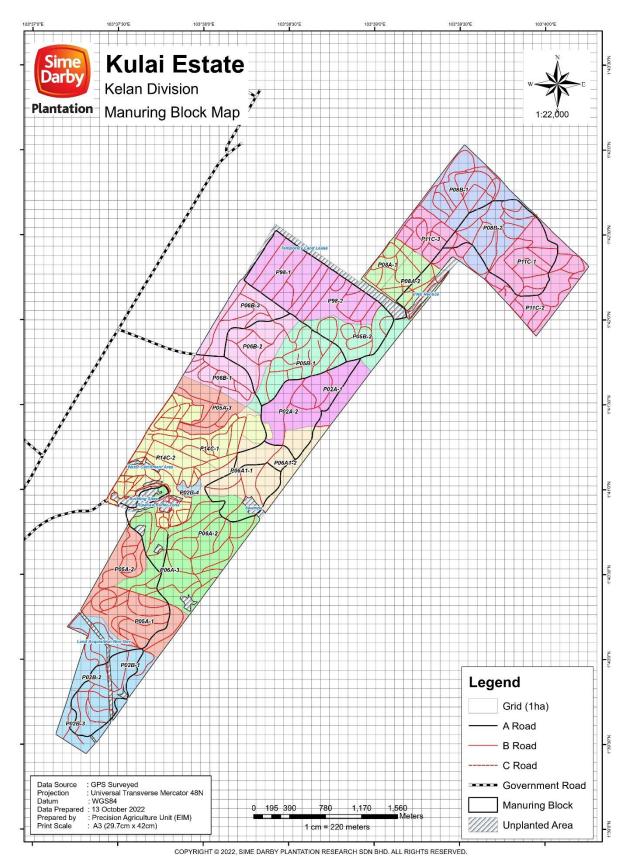


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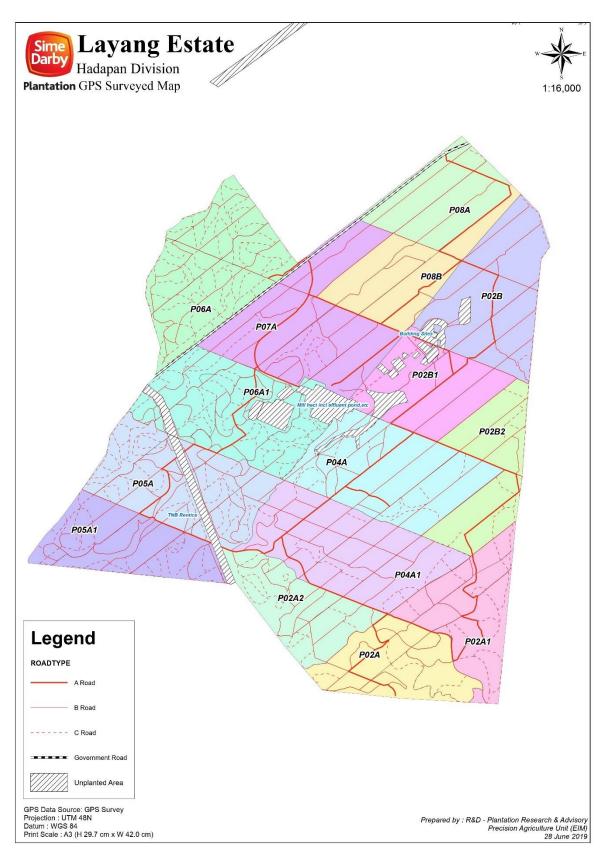
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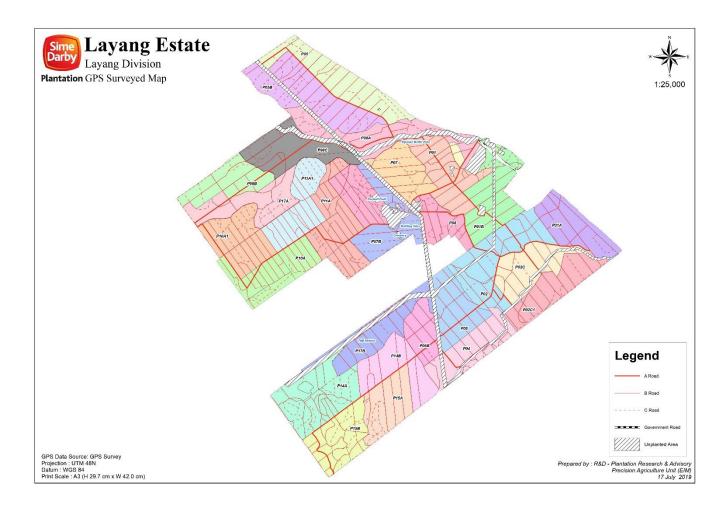
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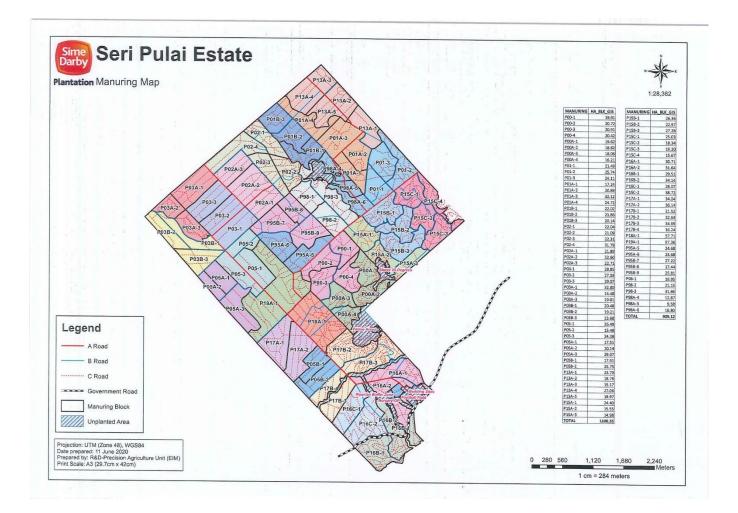


### **PF441 RSPO P&C Public Summary Report** Revision 15 (Nov 2023)

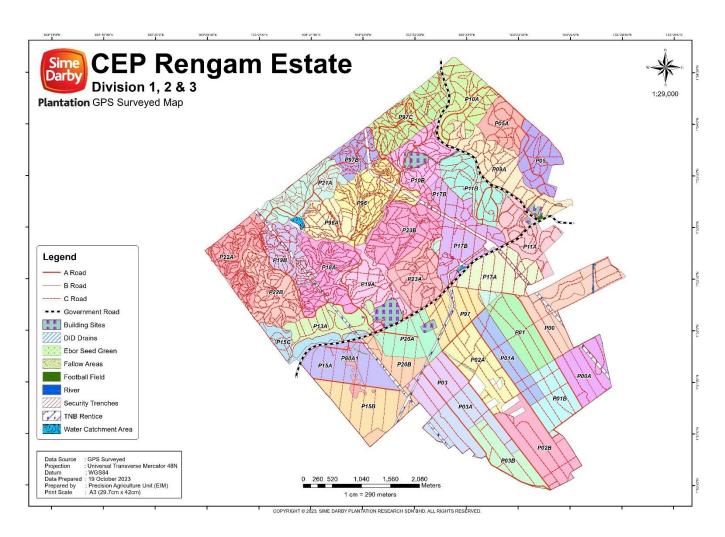




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#### Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	<b>Current Certification</b>	Scope Extension	Other:	
Risk Factor Applied	Choose an item.	Choose an item.	Choose an item.	
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	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area	Production (MT)		
Not Applicable									
	Total								
Note	Note: * are smallholders sampled in this audit.								

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

#### **Appendix F: List of Abbreviations**

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