

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

<b>Client Company Name / Parent Company:</b> <b>SD Guthrie Berhad</b>
Client Company Address: Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia
Certification Unit: <b>Strategic Operating Unit (SOU 11) - Kerdau Palm Oil Mill</b>
Location of Certification Unit: Lot 575, Mukim Kerdau, 28010 Temerloh, Pahang, Malaysia
Date of Final Report: 29/07/2024

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## Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SD Guthrie Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 11) - Kerdu Palm Oil Mill		
Location / Address	Lot 575, Mukim Kerdu, 28010 Temerloh, Pahang, Malaysia		
Website	<a href="http://www.sdguthrie.com">www.sdguthrie.com</a>		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD)	E-mail	shylaja.vasudevan@sdguthrie.com
Telephone	+(603) 78484000 (HQ)	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 745399	Certificate Start Date	07/07/2021
Date of First Certification	07/07/2011	Certificate Expiry Date	06/07/2026
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> <li>• Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>• Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 mt/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 745400	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills	BSI Services (M) Sdn. Bhd.	20/12/2027
MSPO 745401	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services (M) Sdn. Bhd.	20/12/2027
MSPO 745402	MSPO Supply Chain Certification Standard 2018	BSI Services (M) Sdn. Bhd.	24/10/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Kerdau Palm Oil Mill	Lot 575, Mukim Kerdau, 28010 Temerloh, Pahang, Malaysia	3° 34' 11.36" N	102° 16' 49.68" E
Kerdau Estate	Ladang Kerdau, 28010 Temerloh, Pahang Darul Makmur, Malaysia	3° 34' 11.24" N	102° 18' 35.76" E
Mentakab Estate	Ladang Mentakab/ Lanchang/ Edensor, c/o Lanchang Division, 28500 Lanchang, Pahang Darul Makmur, Malaysia	3° 28' 39.33" N	102° 10' 56.62" E
Sg Mai Estate	Ladang Sungai Mai, 27000 Jerantut, Pahang Darul Makmur, Malaysia	3° 48' 30.55" N	102° 21' 24.09" E
Chenor Estate	Ladang Chenor (KT), Sungai Jerik, 26400 Bandar Pusat Jengka, Pahang Darul Makmur, Malaysia	3° 47' 13.68" N	102° 38' 28.69" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Kerdau Estate	5,123.78	67.42	491.84	5,683.04	90.16
Mentakab Estate	2,916.05	31.70	306.07	3,253.82	99.62
Sg. Mai Estate	2,596.90	37.34*	200.74	2,834.98	91.60
Chenor Estate	1,862.69	7.82	126.48	1,996.99	3.27
<b>Total</b>	<b>12,499.42</b>	<b>144.28</b>	<b>1,125.13</b>	<b>13,768.83</b>	

Note: \*Difference of 13.36 ha is due to the reclassification of HCV 4 Area at Sg Mai Estate after re-assessment conducted on July 2020 and confirmed on January 2024. The area was unplanted area and included in infrastructure and other.

## 6. Plantings & Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Kerdau Estate	355.51	3,791.46	976.81	0.00	4,768.27	355.51
Mentakab Estate	393.85	1,608.63	820.41	93.16	2,522.20	393.85
Sg. Mai Estate	660.25	763.97	656.59	516.09	1,936.65	660.25
Chenor Estate	315.33	1,187.50	359.86	0.00	1,547.36	315.33
<b>Total (ha)</b>	<b>1,724.94</b>	<b>7,351.56</b>	<b>2,813.67</b>	<b>609.25</b>	<b>10,774.48</b>	<b>1,724.94</b>

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

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 2023 – Jun 2024)	Actual (Apr 2023 – Apr 2024)		Forecast (Jul 2024 – Jun 2025)
		Previous license period (Apr 2023 – Jun 2023)	Current license period (Jul 2023 – Apr 2024)	
Kerdau Estate	83,268.28	17,130.06	78,021.08	97,479.91
Mentakab Estate	40,962.22	8,298.75	38,130.85	43,712.55
Sg Mai Estate	30,761.50	7,867.46	27,213.84	38,360.00
Chenor Estate	23,750.99	4,860.34	21,808.92	23,291.00
<b>Total</b>	<b>178,742.99</b>	<b>203,331.30</b>		<b>202,843.46</b>

Note: Volume Extension has been requested dated 06/05/2024 and has been approved by RSPO. Additional volume as below:

1. FFB: Original: 178,742.99 MT, Additional: 71,578 MT, Total: 250,320.99 MT
2. CSPO: Original: 36,642.31 MT, Additional: 12,707.06 MT, Total: 49,349.37 MT
3. CSPK: Original: 8,043.43 MT, Additional: 3,404.79 MT, Total: 11,448.22 MT

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 2023 – Jun 2024)	Actual (Apr 2023 – Apr 2024)		Forecast (Jul 2024 – Jun 2025)
		Previous license period (Apr 2023 – Jun 2023)	Current license period (Jul 2023 – Apr 2024)	
Bukit Puteri Estate		854.08	322.55	
Jabor Estate		0.00	637.48	

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<b>Total</b>		<b>1,814.11</b>	<b>18858.64</b>
Note: Certified FFB was received from sister estate under SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) which RSPO Certified. Refer TBP.			

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 2023 – Jun 2024)	Actual (Apr 2023 – Apr 2024)		Forecast (Jul 2024 – Jun 2025)
		Previous license period (Apr 2023 – Jun 2023)	Current license period (Jul 2023 – Apr 2024)	
Outside Crop Provider (OCP)	-	6,917.51	26,076.68	-
Total	-	32,994.19		-

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	Apr 2023	11,253.02	1,842.52	13,095.54
2	May 2023	14,827.83	3,512.82	18,340.65
3	Jun 2023	12,929.84	1562.17	14,492.01
4	July 2023	17,224.29	1,798.17	19,022.46
5	Aug 2023	20,852.83	2,583.50	23,436.33
6	Sept 2023	18,282.98	2,197.47	20,480.45
7	Oct 2023	19,871.78	3,914.39	23,786.17
8	Nov 2023	20,089.75	2,894.59	22,984.34
9	Dec 2023	16,523.85	3,883.39	20,407.24
10	Jan 2024	10,178.21	1,982.08	12,160.29
11	Feb 2024	11,470.96	1,992.62	13,463.58
12	Mar 2024	14,194.71	2,583.66	16,778.37
13	Apr 2024	17,445.36	2,246.81	19,692.17
<b>TOTAL</b>		<b>205,145.41</b>	<b>32,994.19</b>	<b>238,139.60</b>

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Jul 2023 – Jun 2024)	Actual (Apr 2023 – Apr 2024)		Forecast (Jul 2024 – Jun 2025)
	Previous license period (Apr 2023 – Jun 2023)	Current license period (Jul 2023 – Apr 2024)	
FFB	FFB		FFB
178,742.99 mt	39,010.69 mt	166,134.72 mt	202,843.46 mt
	TOTAL	205,145.41	
CPO (OER:20.50%)	CPO (OER: 19.42%)		CPO (OER: 20.48%)
36,642.31 mt	7,622.32 mt	32,217.71 mt	41,542.34 mt
	TOTAL	39,840.03 mt	
PK (KER:4.50%)	PK (KER: 4.48%)		PK (KER: 5.00%)
8,043.43 mt	1,748.22 mt	7,438.75 mt	10,142.17 mt
	TOTAL	9,186.97 mt	
Note: Volume Extension has been requested dated 06/05/2024 and has been approved by RSPO. Additional volume as below:			
1. FFB: Original: 178,742.99 MT, Additional: 71,578 MT, Total: 250,320.99 MT			
2. CSPO: Original: 36,642.31 MT, Additional: 12,707.06 MT, Total: 49,349.37 MT			
3. CSPK: Original: 8,043.43 MT, Additional: 3,404.79 MT, Total: 11,448.22 MT			

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	Apr 2023	2,242.73	483.88
2	May 2023	2,864.74	695.43
3	Jun 2023	2,514.85	568.91
4	July 2023	3,396.63	725.14
5	Aug 2023	4,057.96	909.18
6	Sept 2023	3,612.72	842.85
7	Oct 2023	4,097.56	933.97
8	Nov 2023	3,919.51	938.19
9	Dec 2023	3,126.31	748.53
10	Jan 2024	1,911.47	439.71
11	Feb 2024	2,206.45	476.42
12	Mar 2024	2,652.99	550.75
13	Apr 2024	3,236.11	874.01
<b>TOTAL</b>		<b>39,840.03</b>	<b>9,186.97</b>

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11. Summary of Actual Volume sold					
Current License period (Jul 2023 – Apr 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	1,185.87	0.00	0.00	31,031.84	32,217.71
PK (MT)	2,956.76	0.00	0.00	4,481.99	7,438.75
Credits	7,500.00	0.00	0.00	0.00	7,500.00
Previous License period (Apr 2023 – Jun 2023)					
CPO (MT)	3.42	0.00	0.00	7,618.90	7,622.32
PK (MT)	597.29	0.00	0.00	1,150.93	1,748.22
Credits	0.00	0.00	0.00	0.00	0.00
<p>Note: Carry forward for the month was available and verified (As end of March 2023, CPO=1587.30 MT and PK=678.45 MT). RSPO Credit has been sold on Dec 2023. Based on verification of current licence period Mass Balance Sheet, Palm trace transaction found that the unused credit was available for certified CPO sold as conventional. Since the certified CPO has been sold as conventional 31,031.84 MT. The removal of certified CPO sold as conventional minus with RSPO credit will be conducted at the end of licence period as per SD Guthrie practiced.</p> <p>Estimated production for the last year (July 2022 - June 2023) was 37,901.45 MT, while the actual production was 25,471.84 MT. This results in a difference of 12,429.61 MT. This difference was carried forward to the 13th month for utilization. Consequently, the volume sold for the period from April 2023 to April 2024 appears to exceed the production.</p>					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Buyer A	TR-XXXXXXXX-XXXX	1,189.29	3,554.05
TOTAL			1,189.29	3,554.05
Note: Data is consolidated, and each transaction were verified against PalmTrace				

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
-	-	-	-	-
TOTAL			-	-

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Buyer B	38,650.74	5,632.92
TOTAL		38,650.74	5,632.92



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Note: For previous licence period, the removal was not done and this issue has been raised during internal audit dated 15/01/2024. The corrective action has been taken with evidence of correspondence email dated 18/03/2024 with GTM.

#### 11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)

No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	Buyer C	CBXXXXXX	7,500.00
<b>TOTAL</b>			<b>7,500.00</b>

#### 12. Independent Smallholders Certified Tonnage (MT) / Volume

	Estimated last year (N/A)			Actual (N/A)			Forecast (N/A)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

#### 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)
-	-	-	-	-	-	-
<b>TOTAL</b>		-	-	-	-	-

**Note:** 1 mt = 1 credit

#### 13. Independent Smallholders Actual Sold Tonnage / Volume

	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
<b>Current License period (-)</b>							
Credits				-	-	-	-
Physical	-	-	-				
<b>Previous License period (-)</b>							
Credits				-	-	-	-
Physical	-	-	-				

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

## Section 2: Assessment Process

### Certification Body:

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

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **06-10/05/2024**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **25/06/2024**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification 2)</b>	<b>Year 2 (ASA2_1)</b>	<b>Year 3 (ASA2_2)</b>	<b>Year 4 (ASA2_3)</b>	<b>Year 5 (ASA2_4)</b>
Kerdau POM	✓	✓	✓	✓	✓
Kerdau Estate	✓	✓	✓	✓	✓
Sg. Mai Estate	✓	✓	✓	✓	✓
Chenor Estate	✓	✓	✓	✓	✓
Mentakab Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: February 17, 2025 - February 20, 2025**

**Total Number of Mandays: 15 Mandays**

## **2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Nor Halis Abu Zar (NHA)	Team Leader	<p><b>Education:</b> Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma In Plantation and Industry Management from UiTM in 2009.</p> <p><b>Work Experience:</b> He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS2530:2013 and RSPO Auditor for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p><b>Training attended:</b> He has completed RSPO P&amp;C Lead Auditor Course in Oct 2020, Refresher RSPO P&amp;C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in December 2021, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 &amp; ISO 14001:2015) Lead Auditor Course, HCV &amp; HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, MSPO SCCS Auditor in February 2019 and also trained in</p>

		<p>SMETA Requirement Training on May 2021 &amp; ISH Training by RSPO in August 2023</p> <p><b>Language proficiency:</b> Bahasa Malaysia and English.</p> <p><b>Aspect covered in this audit:</b></p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
<p>Mohamed Zainal (MHZ)</p> <p>Hidhir Abidin</p>	Team Member	<p><b>Education:</b> Bachelor Degree in Chemical Engineering, National University of Malaysia, 2006</p> <p><b>Work Experience:</b> He has 7 years working experience in palm oil industry and 5 years specifically on palm oil milling. He is also experiences third party auditing for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO, RSPO P&amp;C, RSPO SCCS, RBA.</p> <p><b>Training attended:</b> He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO P&amp;C Refresher Course, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, Endorsed RSPO SCCS Refresher Course, Introduction to HCV, HCS &amp; GIS training, SMETA requirement training and Endorsed RSPO Independent Smallholder (ISH) Auditor Training.</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p><b>Aspect covered in this audit:</b></p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
<p>Zulkifli Zaman (ZKZ)</p> <p>Kamarol</p>	Team member	<p><b>Education:</b> He graduated in Bachelor of Science (Agribusiness) from University Putra Malaysia (UPM) in 2008.</p> <p><b>Work Experience:</b> He has 10 years' experience in oil palm industry whereas he has been working at plantation company as Estate Assistant Manager prior to joining Certification Body as an Auditor. He is familiar with the estate's daily operation as well as the Best Management Practices for oil palm cultivation. Prior to joining BSI, he was the auditor for several certification bodies. He is involved in auditing MSPO OPMC, MSPO SCCS, RSPO P&amp;C, RSPO SCCS and PEFC CoC standard.</p> <p><b>Training attended:</b></p>

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		<p>He has completed ISO IMS 9001, 14001, 45001 Lead Auditor Course in April 2018, Endorsed MSPO OPMC Lead Auditor Course in April 2019, Endorsed MSPO SCCS Auditor Course in September 2019, Endorsed RSPO P&amp;C Lead Auditor Course in March 2020, Endorsed RSPO SCCS Lead Auditor Course in March 2020, PEFC Chain of Custody Training in December 2020, ISO 9001:2015 Lead Auditor Course in October 2023, ISO 45001:2018 Lead Auditor Course in November 2023 and SA8000 Introduction &amp; Basic Auditor Training Course in November 2023.</p> <p><b>Aspect covered in this audit:</b></p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements  <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements  <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p> <p><b>Language proficiency:</b></p> <p>He is fluent in English and Bahasa Malaysia.</p>
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## Accompanying Persons:

Name	Role
Nor'ain Mohd Nasir	Observer (Social Elements)

## 2.3 Assessment Plan

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

Date	Time	Subjects	NHA	MHZ	ZKZ
Sunday 05/05/2024	-	Audit Team Travel to Hotel	√	√	√
Monday 06/05/2024 Kerdau Estate	0830 - 0900	Opening Meeting: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).	√	√	√
	0900 - 1200	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc.  Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)	√	√	√
	1230 - 1330	Lunch Break	√	√	√

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Date	Time	Subjects	NHA	MHZ	ZKZ
	1330 – 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Tuesday 07/05/2024  Kerdau POM	0830 - 1230	<p>Inspection: FFB receiving, warehouse, workshop, wastes management &amp; Landfill, Effluent Ponds, OSH &amp; ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc.</p> <p>Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)</p> <p>Supply chain requirements for POM</p> <ul style="list-style-type: none"> <li>• SCCS Module</li> <li>• Internal Audit</li> <li>• Outsourcing activities</li> <li>• Purchasing and Goods In</li> <li>• Sales and Goods Out - Outsourcing Activities</li> <li>• Record keeping - Extraction Rate</li> <li>• Processing</li> <li>• Registration of transaction – Claims</li> <li>• Rules on market communication and claim</li> </ul>	✓	✓	✓
	1230- 1330	Lunch Break	✓	✓	✓
	1330 – 1630	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Wednesday 08/05/2024  Chenor Estate	0830 - 1230	<p>Field visit, boundary inspection, field operations, staff &amp; workers interview, buffer zone, HCV area, IPM implementation, OSH &amp; ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc.</p> <p>Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)</p>	✓	✓	✓

Date	Time	Subjects	NHA	MHZ	ZKZ
	1230-1330	Lunch Break	✓	✓	✓
	1330 – 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Thursday 09/05/2024 Sg Mai Estate	0830 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc.  • Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)	✓	✓	✓
	1230 - 1330	Lunch Break	✓	✓	✓
	1330 - 1600	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1600 - 1700	Interim Closing Briefing	✓	✓	✓
Friday 10/05/2024 Mentakab Estate	0830 – 1130	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc.  • Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)	✓	✓	✓
	1230 - 1330	Lunch Break	✓	✓	✓
	1330 - 1400	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.)	✓	✓	✓



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Date	Time	Subjects	NHA	MHZ	ZKZ
	1400 - 1500	Audit team discussion & Closing Meeting	✓	✓	✓

## Major NC Close Out

Date	Time	Subjects	NHA
Wednesday 24/06/2024	-	Auditor Travel to Hotel	✓
Thursday 25/06/2024 Sg Mai Estate	-	Auditor Travel to Site	✓
	0900 - 1100	Soft Opening Meeting: <ul style="list-style-type: none"> <li>Verification on previous Major NC: 2492732-202405-M1</li> <li>Site observation, workers interview (individual and group session) if necessary</li> <li>Document review – implemented evidence</li> </ul>	✓
	1100 - 1200	Closing Meeting	✓

## Section 3: Assessment Findings

### 3.1 Multiple Management Units and Time Bound Plan

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

as announced by the RSPO Secretariat on 21/12/2021.	2. Rantau Panjang Estate, Napal Estate / Karang Ringin Estate- 1,843.73 ha. 3. Mangun Jaya Estate- 1,398.55 ha 4. Sungai Jernih Estate- 851.57 ha 5. Pelanjau Estate (PT BAL) & Beturus Estate (PT BAL)- 4,071.76ha 6. Karya Palma Estate (PT SNP)-476.70 Ha 7. West and East Estate- 1,452.93 ha	
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there is deviation has been identified at those Indonesia management units but it has been justified and approved by RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	<p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties were sold and currently SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019.</p> <p>Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter:  <a href="http://www.rspo.org/certification/public-announcement">www.rspo.org/certification/public-announcement</a></p> <p>For Liberia operations: As at 16/01/2020, SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has</p>	Complied

	<p>completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p><a href="https://www.sdguthrie.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/">https://www.sdguthrie.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</a></p> <p>ACOP 2020 has been cross-referenced as below: <a href="http://www.rspo.org/members/29">www.rspo.org/members/29</a></p>	
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 and approved by the RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.	Complied
<b>Un-Certified Units or Holdings</b>		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/2023.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) that have completed NPP notification.</p> <p>1. NBPOL (Poliamba Limited) 23/05/2020 – no comments</p> <p><a href="https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/">https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</a></p> <p>2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments</p> <p><a href="https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/">https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/</a></p> <p>3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments</p> <p><a href="https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/">https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</a></p>	Complied

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	<p>4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</a></p> <p>5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</a></p> <p>6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/">https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/</a></p> <p>7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/">https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/</a></p> <p>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/</a></p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</a></p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/">https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</a></p> <p>11. NBPOL (Ramu Agri Industries Ltd) 06/03/2012 - no comments captured in RSPO website:  <a href="https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/">https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</a></p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website</p>	
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	<p><a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</a></p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</a></p> <p>14. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</a></p> <p>Management units for 12 – 14 above were disposed</p>	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of August 2023, 16 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO.</p> <p>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about land conflict has been lodge by stakeholders as at the day of audit.</p>	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	SD Guthrie Berhad (at the point of this audit known as Sime Darby Plantation Berhad) have published Grievance mechanism that is applied to all management units. Disputes related to labor,	Complied

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

last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company.	Complied

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

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



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#### Approved Time Bound Plan

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

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

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Rantau Panjang	Indonesia	Rantau Panjang Estate	2,679.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rantau Panjang Estate	1,843.73	Not Certified	2023	NA		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Napal Estate/Karang Ringin	4,359.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Napal Estate/Karang Ringin	1,843.73	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Mangun Jaya Estate	139.45	Certified	Not Applicable	16-Mar-12					
	Indonesia	Mangun Jaya Estate	1,398.55	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1398.55 ha is still in process.	13-Jul-23
	Indonesia	Sungai Jernih Estate	851.57	Not Certified	2023	N/A		Yes	2024	Land legalization process of 851.57 ha is still in process.	13-Jul-23
	Indonesia	Angsana Mill	15,151.19	Certified	Not Applicable	6-Jul-11					
Angsana	Indonesia	Angsana Estate	3,250.06	Certified	Not Applicable	6-Jul-11					

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	Indonesia	Gunung Sari Estate	2,826.94	Certified	Not Applicable	6-Jul-11					
Mustika	Indonesia	Mustika Mill	14,840.76	Certified	Not Applicable	3-Jul-13					
	Indonesia	Mustika Estate	3,648.74	Certified	Not Applicable	3-Jul-13					
	Indonesia	Pantai bonati Estate	2,534.00	Certified	Not Applicable	6-Jul-11					
Gunung Aru	Indonesia	Gunung Aru Mill	12,740.54	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Aru Estate	2,684.41	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Kemasan Estate	3,511.36	Certified	Not Applicable	5-Jul-11					
	Indonesia	Laut Timur Estate	3,207.28	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pantai Timur Estate	3,337.49	Certified	Not Applicable	5-Jul-11					
Ungkaya	Indonesia	Ungkaya Mill	4,145.00	Certified	Not Applicable	10-Jul-12					
	Indonesia	Ungkaya Estate	4,145.00	Certified	Not Applicable	10-Jul-12					
Rantau	Indonesia	Rantau Mill	24,169.56	Certified	Not Applicable	30-Dec-11					
	Indonesia	Rantau Estate	4,638.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Matalok Estate	3,082.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Selabak Estate ( PT SAA)	3,757.67	Certified	Not Applicable	16-Mar-12					
	Indonesia	Randi Estate (PT SAA)	2,882.98	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sangkoh Estate (PT SAA)	3,789.34	Certified	Not Applicable	16-Mar-12					
	Indonesia	Lanting Estate (PT LMR)	3,249.27	Certified	Not Applicable	16-Mar-12					
Betung	Indonesia	Betung Mill	7,579.57	Certified	Not Applicable	1-Apr-14					
	Indonesia	Betung Estate	4,266.00	Certified	Not Applicable	1-Apr-14					
	Indonesia	Sekayu Estate	3,313.57	Certified	Not Applicable	1-Apr-14					
Bebunga	Indonesia	Bebunga Mill	14,274.77	Certified	Not Applicable	16-Mar-12					

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

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	Indonesia	Lembiru Estate	4,929.49	Certified	Not Applicable	3-Jul-14					
	Indonesia	Awatan Estate	3,476.79	Certified	Not Applicable	3-Jul-14					
	Indonesia	Pelanjau Estate (PT BAL)	1,002.79	Certified	Not Applicable	3-Jul-19					
	Indonesia	Pelanjau Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Beturus Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Karya Palma Estate (PT SNP)	476.70	Not Certified	2023	N/A		Yes	2024	Land legalization process for 476.70 ha is still in process.	13-Jul-23
Bukit Ajong	Indonesia	Bukit Ajong Mill	11,498.82	Certified	Not Applicable	18-Oct-10					
	Indonesia	West Estate	4,562.34	Certified	Not Applicable	18-Oct-10					
	Indonesia	West Estate	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
	Indonesia	East Estate	2,665.48	Certified	Not Applicable	18-Oct-10					

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

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	Malaysia	Flemington Estate	1,906.84	Certified	Not Applicable	5-Oct-11					
	Malaysia	Bagan Datoh Estate	3,781.86	Certified	Not Applicable	5-Oct-11					
	Malaysia	Sabak Bernam Estate	2,511.79	Certified	Not Applicable	5-Oct-11					
	Malaysia	Sg. Samak Estate	3,025.74	Certified	Not Applicable	5-Oct-11					
Seri Intan/Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	Not Applicable	3-Mar-11					
	Malaysia	Selaba Oil Mill	1,549.75	Certified	Not Applicable	3-Mar-11					
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sabrang Estate	3,945.23	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sogomana Estate	2,214.08	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sg. Wangi Estate	2,226.66	Certified	Not Applicable	3-Mar-11					
	Malaysia	Bikam Estate	2,075.16	Certified	Not Applicable	3-Mar-11					
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	Not Applicable	3-Mar-11					
Tennamaram	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	Not Applicable	3-Mar-11					
	Malaysia	Tennamaram Estate	1,981.60	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	Not Applicable	3-Mar-11					
	Malaysia	Bukit Talang Estate	3,572.44	Certified	Not Applicable	3-Mar-11					
Bukit Kerayong	Malaysia	Bukit Benut Oil Mill	6,346.90	Certified	Not Applicable	15-Apr-11					
	Malaysia	Bukit Benut Estate	2,699.28	Certified	Not Applicable	15-Apr-11					
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	Not Applicable	15-Apr-11					
East	Malaysia	East Oil Mill	10,902.94	Certified	Not Applicable	19-May-10					
	Malaysia	East Estate	5,634.45	Certified	Not Applicable	19-May-10					



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	Malaysia	Sepang Estate	2,092.28	Certified	Not Applicable	19-May-10					
	Malaysia	Dusun Durian Estate	3,176.21	Certified	Not Applicable	19-May-10					
West	Malaysia	West Oil Mill	5,912.69	Certified	Not Applicable	19-May-10					
	Malaysia	West Estate	5,912.69	Certified	Not Applicable	19-May-10					
Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	Not Applicable	7-Jul-11					
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	Not Applicable	7-Jul-11					
Kerdu	Malaysia	Kerdu Oil Mill	13,781.50	Certified	Not Applicable	7-Jul-11					
	Malaysia	Kerdu Estate	5,683.04	Certified	Not Applicable	7-Jul-11					
	Malaysia	Mentakab Estate	3,266.49	Certified	Not Applicable	7-Jul-11					
	Malaysia	Chenor Estate	2,834.98	Certified	Not Applicable	7-Jul-11					
	Malaysia	Sg Mai Estate	1,996.99	Certified	Not Applicable	7-Jul-11					
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	Not Applicable	7-Jul-11					
	Malaysia	Jabor Estate	2,332.92	Certified	Not Applicable	7-Jul-11					
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	Not Applicable	30-Dec-11					
	Malaysia	Labu Estate	4,529.72	Certified	Not Applicable	30-Dec-11					
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	Not Applicable	19-May-10					
	Malaysia	Tanah Merah Estate	4,341.73	Certified	Not Applicable	19-May-10					
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	Not Applicable	19-May-10					
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sua Betong Estate	2,870.75	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sengkang Estate	2,831.51	Certified	Not Applicable	18-Feb-14					
	Malaysia	Bradwall Estate	3,828.34	Certified	Not Applicable	18-Feb-14					

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	Malaysia	PD Lukut Estate	1,523.79	Certified	Not Applicable	18-Feb-14					
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sg. Bahru Estate	1,427.31	Certified	Not Applicable	18-Feb-14					
	Malaysia	Salak Estate	3,868.86	Certified	Not Applicable	18-Feb-14					
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	Not Applicable	7-Jul-11					
	Malaysia	Muar River Estate	1,584.62	Certified	Not Applicable	7-Jul-11					
	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	Not Applicable	7-Jul-11					
	Malaysia	Kok Foh Estate	2,275.84	Certified	Not Applicable	7-Jul-11					
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	Not Applicable	7-Jul-11					
	Malaysia	St. Helier Estate	1,992.65	Certified	Not Applicable	7-Jul-11					
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	Not Applicable	7-Jul-11					
	Malaysia	Pertang Estate	1,052.49	Certified	Not Applicable	7-Jul-11					
Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	Not Applicable	20-May-10					
	Malaysia	Kempas Estate	4,505.45	Certified	Not Applicable	20-May-10					
	Malaysia	Tangkah Estate	2,537.78	Certified	Not Applicable	20-May-10					
	Malaysia	Kemuning Estate	2,671.05	Certified	Not Applicable	20-May-10					
	Malaysia	Serkam Estate	2,114.23	Certified	Not Applicable	20-May-10					
Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	Not Applicable	5-Oct-11					
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	Not Applicable	5-Oct-11					
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	Not Applicable	5-Oct-11					
	Malaysia	Welch Estate	1,447.82	Certified	Not Applicable	5-Oct-11					

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Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	Not Applicable	28-Jan-14					
	Malaysia	Pagoh Estate	2,325.93	Certified	Not Applicable	28-Jan-14					
	Malaysia	Lanadron Estate	1,964.44	Certified	Not Applicable	28-Jan-14					
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	Not Applicable	28-Jan-14					
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	Not Applicable	18-Nov-10					
	Malaysia	Chaah Estate	2,795.36	Certified	Not Applicable	18-Nov-10					
	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	Not Applicable	18-Nov-10					
	Malaysia	North Labis Estate	3,532.91	Certified	Not Applicable	18-Nov-10					
Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	Not Applicable	19-May-10					
	Malaysia	Gunung Mas Estate	3,466.17	Certified	Not Applicable	19-May-10					
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	Not Applicable	19-May-10					
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	Not Applicable	19-May-10					
	Malaysia	Yong Peng Estate	2,975.41	Certified	Not Applicable	19-May-10					
Bukit Benut	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	Not Applicable	5-Oct-11					
	Malaysia	Bukit Benut Estate	2,799.78	Certified	Not Applicable	5-Oct-11					
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	Not Applicable	5-Oct-11					
	Malaysia	CEP Nyior Estate	1,955.19	Certified	Not Applicable	5-Oct-11					
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	Not Applicable	11-Apr-11					
	Malaysia	Ulu Remis Estate	2,598.25	Certified	Not Applicable	11-Apr-11					
	Malaysia	Cenas Estate	1,974.06	Certified	Not Applicable	11-Apr-11					
	Malaysia	Bukit Badak Estate	3,234.25	Certified	Not Applicable	11-Apr-11					
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	Not Applicable	11-Apr-11					

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	Malaysia	Pekan Estate	3,258.70	Certified	Not Applicable	11-Apr-11					
	Malaysia	Sembrong Estate	1,778.88	Certified	Not Applicable	11-Apr-11					
Bukit Kerayong	Malaysia	Bukit Kerayong Oil Mill	11,371.82	Certified	Not Applicable	29-Mar-11					
	Malaysia	Sri Pulau Estate	2,049.87	Certified	Not Applicable	29-Mar-11					
	Malaysia	Kulai Estate	3,023.42	Certified	Not Applicable	29-Mar-11					
	Malaysia	Layang Estate	3,258.90	Certified	Not Applicable	29-Mar-11					
	Malaysia	CEP Renggam Estate	3,039.63	Certified	Not Applicable	29-Mar-11					
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tunku Estate	3,199.05	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tigowis Estate	2,074.02	Certified	Not Applicable	1-Oct-08					
	Malaysia	Sentosa Estate	3,545.54	Certified	Not Applicable	1-Oct-08					
	Malaysia	Segaliud Estate	4,820.13	Certified	Not Applicable	1-Oct-08					
Melalap	Malaysia	Melalap Oil Mill	5246.18	Certified	Not Applicable	21-Jan-11					
	Malaysia	Melalap Estate	2,096.73	Certified	Not Applicable	21-Jan-11					
	Malaysia	Sapong Estate	3,149.45	Certified	Not Applicable	21-Jan-11					
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	Not Applicable	16-Jan-09					
	Malaysia	Binuang Estate	3,271.08	Certified	Not Applicable	16-Jan-09					
	Malaysia	Sungang Estate	3,407.98	Certified	Not Applicable	16-Jan-09					
	Malaysia	Tingkayu Estate	1,881.08	Certified	Not Applicable	16-Jan-09					
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	Not Applicable	16-Jan-09					
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	Not Applicable	16-Jan-09					

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	Malaysia	Giram Estate	4,166.98	Certified	Not Applicable	16-Jan-09					
	Malaysia	Mostyn Estate	4,178.04	Certified	Not Applicable	16-Jan-09					
Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	Not Applicable	16-Jan-09					
	Malaysia	Merotai Estate	3,052.66	Certified	Not Applicable	16-Jan-09					
	Malaysia	Imam Estate	3,773.56	Certified	Not Applicable	16-Jan-09					
	Malaysia	Tiger Estate	2,497.86	Certified	Not Applicable	16-Jan-09					
	Malaysia	Table Estate	2,221.63	Certified	Not Applicable	16-Jan-09					
Lavang	Malaysia	Lavang Oil Mill	24,836.54	Certified	Not Applicable	30-Dec-11					
	Malaysia	Lavang Estate	4,363.83	Certified	Not Applicable	30-Dec-11					
	Malaysia	Rasan Estate	3,454.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Belian Estate	2,847.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Kelida Estate	2,460.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Lavang (Special) Estate	included under Lavang Estate Ha	Certified	Not Applicable	30-Dec-11					
	Malaysia	Pekaka Estate	2,626.14	Certified	Not Applicable	30-Dec-11					
	Malaysia	Ruai Estate	2,460.96	Certified	Not Applicable	30-Dec-11					
	Malaysia	Dulang Estate	2,548.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Charquest Estate	1,448.71	Certified	Not Applicable	30-Dec-11					
	Malaysia	Paroh Estate	2,627.90	Certified	Not Applicable	30-Dec-11					
Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	Not Applicable	30-Dec-11					

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	Malaysia	Rajawali Estate	6,087.27	Certified	Not Applicable	30-Dec-11					
	Malaysia	Samudera Estate	3,308.60	Certified	Not Applicable	30-Dec-11					
	Malaysia	Semarak Estate	2,248.68	Certified	Not Applicable	30-Dec-11					
	Malaysia	Bayu Estate	2,459.90	Certified	Not Applicable	30-Dec-11					
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	Not Applicable	30-Dec-11					
	Malaysia	Derawan Estate	2,490.79	Certified	Not Applicable	30-Dec-11					
	Malaysia	Sahua Estate	2,644.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Takau Estate	2,107.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Damai Estate	2,287.04	Certified	Not Applicable	30-Dec-11					
Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Tetere Estate	2,947.79	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	Not Applicable	18-Mar-11					

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Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	Not Applicable	15-Feb-13					
	PNG	Giligili Estate	1,095.47	Certified	Not Applicable	15-Feb-13					
	PNG	Hagita Estate	2,450.02	Certified	Not Applicable	15-Feb-13					
	PNG	Waigani Estate	2,341.13	Certified	Not Applicable	15-Feb-13					
	PNG	Sagarai Estate	2,864.55	Certified	Not Applicable	15-Feb-13					
	PNG	Padipadi Estate	4,517.67	Certified	Not Applicable	15-Feb-13					
	PNG	Mariawatte Estate	1,680.14	Certified	Not Applicable	15-Feb-13					
	PNG	Smallholders - East Gurney Estate (259)	450.59	Certified	Not Applicable	15-Feb-13					
	PNG	Smallholders - West Gurney Estate (231)	479.13	Certified	Not Applicable	15-Feb-13					
	PNG	Smallholders - East Sagarai Estate (156)	283.93	Certified	Not Applicable	15-Feb-13					
Poliamba (POL)	Papua New Guinea	Poliamba Oil Mill	10,720.53	Certified	Not Applicable	19-Mar-12					
	PNG	Kara Estate	1,032.10	Certified	Not Applicable	19-Mar-12					
	PNG	Nalik Estate	2,666.75	Certified	Not Applicable	19-Mar-12					
	PNG	West Coast Estate	627.60	Certified	Not Applicable	19-Mar-12					
	PNG	Noatsi Estate	2,064.10	Certified	Not Applicable	19-Mar-12					
	PNG	Madak Estate	1,517.11	Certified	Not Applicable	19-Mar-12					
	PNG	Smallholders -North Division (615)	1,022.12	Certified	Not Applicable	19-Mar-12					

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	PNG	Smallholders- Division (866)	South	1,257.21	Certified	Not Applicable	19-Mar-12					
	PNG	Smallholders Division (309)	-West	533.54	Certified	Not Applicable	19-Mar-12					
Ramu Agricultural Industries Ltd (RAIL)	Papua New Guinea	Gusap Mill		14,606.08	Certified	Not Applicable	5-Aug-10					
	PNG	Gusap East (Gusap) Estate		2,856.45	Certified	Not Applicable	5-Aug-10					
	PNG	Gusap West (Paddock) Estate		3,019.09	Certified	Not Applicable	5-Aug-10					
	PNG	Surinam Estate		2,154.14	Certified	Not Applicable	5-Aug-10					
	PNG	Dumpu Estate		2,254.36	Certified	Not Applicable	5-Aug-10					
	PNG	Ngaru Estate		854.33	Certified	Not Applicable	5-Aug-10					
	PNG	J Estate (Jephcott) Estate		2,824.01	Certified	Not Applicable	5-Aug-10					
	PNG	Smallholders - Madang VOPs (71)		360.00	Certified	Not Applicable	5-Aug-10					
	PNG	Smallholders - Morobe VOPs (253)		283.70	Certified	Not Applicable	5-Aug-10					
Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill			Certified	Not Applicable	1-Feb-13					
	PNG	Mamba Oil Mill			Certified	Not Applicable	1-Feb-13					
	PNG	Embi Estate		1,737.78	Certified	Not Applicable	1-Feb-13					
	PNG	Ambogo Estate		2,040.00	Certified	Not Applicable	1-Feb-13					
	PNG	Sangara Estate		1,780.00	Certified	Not Applicable	1-Feb-13					
	PNG	Sumbiripa Estate		2,545.00	Certified	Not Applicable	1-Feb-13					



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	PNG	Mamba Estate	4,013.10	Certified	Not Applicable	1-Feb-13					
	PNG	Sambogo Estate	2,637.85	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	Not Applicable	1-Feb-13					
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Kumbango Oil Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Kapiura Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Numundo Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Waraston Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Bebere Estate	2,226.71	Certified	Not Applicable	10-Sep-08					
	PNG	Kumbango Estate	2,610.80	Certified	Not Applicable	10-Sep-08					
	PNG	Togulo Estate	1,509.20	Certified	Not Applicable	10-Sep-08					
	PNG	Dami Estate	1,507.00	Certified	Not Applicable	10-Sep-08					
	PNG	Waisisi Estate	1,090.00	Certified	Not Applicable	10-Sep-08					
	PNG	Kautu Estate	4,280.60	Certified	Not Applicable	10-Sep-08					

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

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	PNG	Smallholders VOP West (1279)	2,804.10	Certified	Not Applicable	10-Sep-08					
	PNG	Smallholders LSS Kapiura (551)	551.00	Certified	Not Applicable	10-Sep-08					
	PNG	Smallholders VOP Kapiura (850)	847.00	Certified	Not Applicable	10-Sep-08					
	PNG	Smallholders Kaulong/Akami/Pushiki/R epamira/Sakapei (20)	700.37	Certified	Not Applicable	10-Sep-08					
Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	Not Applicable	27-Mar-20				There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.	
	PNG	Munum Estate	1,734.57	Certified	Not Applicable	27-Mar-20					
	PNG	Maralumi Estate	2,427.15	Certified	Not Applicable	27-Mar-20					
	PNG	Erap Estate	1,237.68	Certified	Not Applicable	27-Mar-20					

### 3.3 Details of Nonconformities

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

During this Assessment there were *One* (1) Critical; *One* (1) Minor nonconformities and Zero (0) Opportunity For Improvement raised. The *SD Guthrie Berhad SOU 11 Kerdu Palm Oil Mill & Supply Bases* Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2492732-202405-M1	Issued Date	10/05/2024
Due Date	09/08/2024	Closure Date	25/06/2024
Indicator & Category (Critical / Minor)	3.6.1 Critical		
Statement of Nonconformity:	CHRA Recommendation, SDS Requirements and HIRARC Risk control for manuring activities was not fully implemented.		
Requirement Reference:	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p>Sg Mai Estate</p> <p>During site visit at Field P21A Manuring Activities NK C10.5/30, it was found that there is no clean water was provided for manurer in that operation. Further interview with Mandore, there is also no portable eye wash. Interview with Tractor Driver, there is no designated area to place clean water in the trailer since load with fertilizer. It was not in line with:</p> <ol style="list-style-type: none"> <li>1. SDS stated on the Emergency Response Eye: Rinse with open eye properly, Skin: Clean with water and soap.</li> <li>2. CHRA Recommendation: Work unit: Manuring Operator: (e) Personal Hygiene, Clean water was provided during field operation and pesticide mixing area, To ensure clean water available when applying fertilizer on the field.</li> <li>3. HIRARC Manuring dated 26/11/2021: Existing Control: Bring an adequate supply of water.</li> </ol>		
Corrections:	<ol style="list-style-type: none"> <li>1. Immediately provide clean water for manurer and portable eyewash to mandore.</li> <li>2. Install the compartment at the trailer to place the clean water container.</li> </ol>		
Root Cause Analysis:	Inadequate understanding and implementation of the recommended controls by CHRA, SDS and HIRARC by field supervisor and mandore due to ineffective training and monitoring which had been conducted previously.		
Corrective Actions:	<ol style="list-style-type: none"> <li>1. Ensure the clean water and portable eyewash available during the fertilizer application by giving reminder/briefing to the driver and mandore.</li> <li>2. Monitoring checklist to be filled by mandore and field supervisor before the tractor and workers go into the field. As enforcement, Assistant Manager will also counter check the list to ensure the implementation.</li> </ol>		

<b>Assessment Conclusion:</b>	<p>Major NC Close Out</p> <ol style="list-style-type: none"> <li>1. Reminder and Briefing has been given to the Mandore and Tractor Driver. Refer Training "Briefing on CHRA / SDS / HIRARC With Supervisor &amp; Mandore dated 17/05/2024. Sighted training material, attendance and photos. Sighted evidence of training evaluation that ensure the understanding of the trainee. Interview with Mandore and Tractor driver found they have good awareness on the training given.</li> <li>2. Monitoring checklist has been developed and implemented. Refer Document Tractor Checklist filled by Tractor Driver, Checking by Mandore and Verified by Assistant Manager. Sample record verified dated 20/06/2024 and 10/06/2024.</li> <li>3. Portable Eye Wash and Clean water container has been attached at the trailer compartment and well functioned. Sighted also the reminder checklist has been stick at the tractor body for awareness.</li> <li>4. Interview with estate management confirmed that correction and corrective action has been implemented.</li> </ol> <p>Based on the above evidence, the major non-Conformity is closed effectively on 25/06/2024. Continuous implementation will be further verified in the next assessment.</p>
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Non-conformity			
<b>NCR Ref #</b>	2492732-202405-N1	<b>Issued Date</b>	10/05/2024
<b>Due Date</b>	Next Surveillance	<b>Closure Date</b>	Open
<b>Indicator &amp; Category (Critical / Minor)</b>	7.3.1 Minor		
<b>Statement of Nonconformity:</b>	Waste management plan to include recycling and disposal of waste from additional processes were not comprehensively documented and implemented.		
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
<b>Objective Evidence:</b>	<p>Sg Mai Estate</p> <p>Sighted minor spills of oil onto soil resulting from open tractor/vehicle parking area. Based on Waste Management Plan FY 2024, waste generated from oil contaminated soil has not been identified together with the approach on waste disposal.</p> <p>Mentakab Estate</p> <p>Sighted spot of oil contaminated soil at estate's scarp yard. waste generated from soil contaminated with oil has not been identified in the Waste Management Plan FY 2024 together with the approach on waste disposal.</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Excavate the contaminated soil and placed at SW store and registered as SW408 with labelling (Contaminated soil, debris or matter resulting from cleaning-up of a spill of chemical, mineral oil or scheduled wastes) – as per guideline Waste Management Procedure For Upstream Malaysia (SD/SDP/GSD/HSE/0522/01)</li> <li>2. To provide tray for all tractors special use during parking.</li> </ol>		

	3. To check the parking areas allocated nearby the workshop if any spillage and ensure all the contaminated soil are collected.
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1. The practice to ensure availability of tray during tractor park to prevent oil spillage is not fully implemented. This is due to inadequate monitoring and inspection of the need and insufficient tray available to cater for all the tractors.</li> <li>2. The contaminated soil was not treated as scheduled waste due to ineffective training on scheduled waste previously conducted.</li> </ol>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. To include the identification of SW408 - Contaminated Soil in Waste Management Plan.</li> <li>2. To conduct SW refresher briefing to all staff and workers by CePSWaM competent person.</li> <li>3. Daily inspection by Foreman and Management team to ensure all driver place the tray under tractor after parking and no leakage. Immediate repair required if any leakages happened.</li> <li>4. Periodic briefing during muster and tool box meeting to ensure the practices are fully implemented.</li> </ol>
<b>Assessment Conclusion:</b>	CAP has been accepted. The effectiveness of the implementation will be verified during next visit.

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good cooperation given to the audit team by site and HQ team
PF 2	Good comment and feedbacks from stakeholder as per consultation.

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

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	N/A	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			

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<b>Objective Evidence:</b>	
<b>Corrections:</b>	
<b>Root Cause Analysis:</b>	
<b>Corrective Actions:</b>	
<b>Assessment Conclusion:</b>	
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	

Previous Audit Minor Non-conformity			
<b>NCR Ref #</b>	2333425-202304-N1	<b>Issued Date</b>	14/04/2023
<b>Due Date</b>	10/05/2024	<b>Closure Date</b>	10/05/2024
<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.2 (Minor)		
<b>Statement of Nonconformity:</b>	The implementation of Chemical Safety Management Procedure was not demonstrated effectively.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place		
<b>Objective Evidence:</b>	<p><u>Sg. Mai Estate</u></p> <p>During site visit and interview with sprayers and field mandore, it was noted that the sprayers were transported to the field with loading trailer instead of passenger trailer due tire bearing damage. Sighted during site visit, the trailer was parked at the workshop. The implementation was against the Chemical Safety Management Procedure, doc. ref. no. UM/HSE/OCP/04 dated 09/03/2021 under section 6.2. Transportation of Chemicals stated as follows:</p> <p>6.2.2 Scope of Transportation</p> <p>a) Within Estate</p> <p>Any vehicles that transport chemicals should have the following requirements;</p> <ul style="list-style-type: none"> <li>• Separate compartments for chemicals and workers</li> </ul> <p>This shows that the implementation of the of the procedure was not effectively demonstrated. Hence, a Minor NC was raised.</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Immediate repair and use of the passenger trailer which broke down on 14 March 2023.</li> <li>2. Immediate reminder given to Supervisor and Mandore if the passenger trailer breaks down in future, make sure chemicals and workers are transported separately and safely e.g., having separate compartment if they are transported in the same trailer.</li> <li>3. Refresher training have been carried out to Supervisor, Mandore and sprayer on 25 April 2023 on; <ul style="list-style-type: none"> <li>• Chemical Safety Management Procedure</li> <li>• Safe transportation of chemical</li> </ul> </li> </ol>		

<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1. The frequency of this issue happening to Estate operation is not frequent. As such, Estate Management did not put in place the alternate plan for cases as this leading to non-conformances to the requirements as stated in the Chemical Safety Management Procedure, doc. ref. no. UM/HSE/OCP/04.</li> <li>2. Furthermore, the involved staff and workers were not adequately briefed with Chemical Safety Management Procedure.</li> </ol>												
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Assistant Manager do need to ensure that SOPs related to chemical safety are briefed to Supervisor, Mandore and sprayer and to review any lapses in understanding on a quarterly basis during OSH meeting (for staff) and during morning muster/onsite training (for sprayers).</li> <li>2. To include refresher training on Chemical Safety Management Procedure in Estate training program (newly revised for year 2023).</li> </ol>												
<b>Assessment Conclusion:</b>	<p>SOP Related Chemical Safety Management has been done. Refer training record for chemical safety management FY 2024 as below:</p> <table border="1"> <thead> <tr> <th>Estate</th><th>Training Date</th></tr> </thead> <tbody> <tr> <td>Kerdau Estate</td><td>04/10/2024</td></tr> <tr> <td>Chenor Estate</td><td>20/03/2024</td></tr> <tr> <td>Sg Mai Estate</td><td>11/01/2024</td></tr> <tr> <td>Mentakab Estate</td><td>05/01/2024</td></tr> <tr> <td>Kerdau POM</td><td>02/01/2024</td></tr> </tbody> </table> <p>Additionally, awareness briefing has been given during muster call. Sample of record verified was at Sg Mai Estate dated 08/05/2023.</p> <p>Matters related chemical safety management has been discussed during Quarterly OSH Meeting. Refer OSH Minutes of meeting for Q3 and Q4 FY 2023.</p> <p>Verification on the Estate Training Programme (Safety &amp; health Plan) FY 2023 and 2024 was included training related Chemical safety Management.</p> <p>The implementation of the CAP was verified thus Minor NC was effectively closed on 10/05/2024</p>	Estate	Training Date	Kerdau Estate	04/10/2024	Chenor Estate	20/03/2024	Sg Mai Estate	11/01/2024	Mentakab Estate	05/01/2024	Kerdau POM	02/01/2024
Estate	Training Date												
Kerdau Estate	04/10/2024												
Chenor Estate	20/03/2024												
Sg Mai Estate	11/01/2024												
Mentakab Estate	05/01/2024												
Kerdau POM	02/01/2024												

Previous Audit Minor Non-conformity			
<b>NCR Ref #</b>	2333425-202304-N2	<b>Issued Date</b>	14/04/2023
<b>Due Date</b>	10/05/2024	<b>Closure Date</b>	10/05/2024
<b>Indicator &amp; Category (Critical / Minor)</b>	7.12.7 (Minor)		
<b>Statement of Nonconformity:</b>	The management & monitoring of river reserve/stream buffer/water bodies HCV Area were insufficient.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	Based on the documented report pf High Conservation Value (HCV) Re-Assessment for Pahang Zone: Strategic Operating Unit (SOU):		



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	<ul style="list-style-type: none"><li>- 10: Bukit Puteri</li><li>- 11: Kerdau</li><li>- 12: Jabor</li></ul> <p>by PSQM Department, Sime Darby Plantation Sdn. Bhd., Final Report (Version II) March 2016, it was specified in Table 2: Management of HCVA including the following:</p> <table><tr><th>HCV Area (HCVA)</th><th>Possible Threats</th><th>Management &amp; Monitoring of HCVA</th></tr><tr><td>River reserve/stream buffer/water bodies</td><td><ul style="list-style-type: none"><li>- Riverbanks erosion</li><li>- Sedimentation eutrophication aquatic environment and vegetation overgrowth due fertilizer applications</li><li>- Interruption on aquatic biological health</li><li>- Degradation catchment areas</li></ul></td><td><ul style="list-style-type: none"><li>- Education and awareness for workers</li><li>- Monitoring of water sampling results (where applicable)</li><li>- Ensure no agrochemical activities and carried out at bordering the water bodies</li><li>- Cover any bare soil with planting of vetiver grasses, groundcovers, etc. to reduce soil erosion</li><li>- Monitoring by photo (with date) of riverbanks</li></ul></td></tr></table> <p>However, it was found in Mentakab Estate as following:</p> <ul style="list-style-type: none"><li>• Lanchang Division: Riverbanks erosion sighted in river reserve of Chermang Kanan River near bridge within P99A3 &amp; P13B field but no monitoring by photo (with date) of the riverbanks.</li><li>• Edensor Division: Based on the result of Pesticide in Water Analysis by Sime Darby Plantation Research Sdn. Bhd. for Test Report # PL689/2022; Date issued: 08/11/2022, all pesticide parameters tested were not detected in all samples of upstream and downstream of Semantan River water. However, it was found during site visit at the old Edensor Estate Bridge within P17B field that agrochemical activities are not fully ensured not to be carried out at bordering the water bodies.</li><li>• These indicated that the management &amp; monitoring of river reserve/stream buffer/water bodies HCVA were insufficient. Hence, a Minor NC was raised.</li></ul>	HCV Area (HCVA)	Possible Threats	Management & Monitoring of HCVA	River reserve/stream buffer/water bodies	<ul style="list-style-type: none"><li>- Riverbanks erosion</li><li>- Sedimentation eutrophication aquatic environment and vegetation overgrowth due fertilizer applications</li><li>- Interruption on aquatic biological health</li><li>- Degradation catchment areas</li></ul>	<ul style="list-style-type: none"><li>- Education and awareness for workers</li><li>- Monitoring of water sampling results (where applicable)</li><li>- Ensure no agrochemical activities and carried out at bordering the water bodies</li><li>- Cover any bare soil with planting of vetiver grasses, groundcovers, etc. to reduce soil erosion</li><li>- Monitoring by photo (with date) of riverbanks</li></ul>
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<b>Corrections:</b>	<p>Estate Management organized a refresher training immediately for staff and sprayers to emphasize on spraying technique to avoid any agrochemical activities on river reserve/stream buffer/water bodies HCV area.</p> <p>To plant vetiver grass at the eroded riverbanks at Lanchang Division</p>						
<b>Root Cause Analysis:</b>	<p>Ineffective monitoring and supervision of spraying operation in the Estate by Management which resulted in riverbank erosion and agrochemical activities being carried out in river reserve/stream buffer/water bodies/HCV in both divisions.</p>						
<b>Corrective Actions:</b>	<ol style="list-style-type: none"><li>1. To plant vetiver grass at the eroded riverbanks at Lanchang Division and monitor by photo (with date) by estate management to ensure that the ground cover is restored.</li><li>2. To strengthen agrochemical activity supervision along old Edensor Estate Bridge within P17B field (Edensor Division) and other identified river reserve/stream, buffer/water bodies, HCV area to ensure no reoccurrence of</li></ol>						

	the issue by having a monitoring plan on the supervision and verified by Estate Management on quarterly basis.
<b>Assessment Conclusion:</b>	Refresher training for sprayer was carried out at Mentakab Estate on 8/1/2024. The training has emphasis on spraying technique to avoid any agrochemical activities on river reserve/stream buffer/water bodies HCV area. No evidence of chemical spray sighted along buffer zone area of (Sg Chermang Kiri/Kanan and Sg Semantan). Cultivation of vetiver grass can be seen along the buffer zone as to strengthen the soil structure. Sandbag and gabion wall were used to further enhance the bund structure at badly eroded area along the said buffer zone. The implementation of corrective action is found to be effective thus, the previous minor NC is closed on 10/5/2024. Continuous implementation will be further verified in the next assessment.

Previous Audit Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	<p><b>OFI Statement:</b>  <u>2333425-202304-I1</u>  Indicator 4.2.3  The management could update communication with stakeholders on their request.</p> <p><b>Verification / Follow-up actions:</b>  Verification during the audit found that communication with stakeholders regarding their requests and action taken was documented in the minutes of stakeholder meetings for each visited operating unit. This was also confirmed during interview with sampled relevant stakeholders, management will response to the stakeholder if they made any requests to the estate and mill.</p>

Previous Audit Opportunity for Improvement	
OFI#	Description
<b>OFI 2</b>	<p><b>OFI Statement:</b>  <u>2333425-202304-I2</u>  Indicator 6.2.2  The management could improve the information in employment contract to reflect with revise applicable requirements.</p> <p><b>Verification / Follow-up actions:</b>  Based on sampled employment contracts, the contracts were signed in dual language which is English and their home country language such as Bahasa Indonesia, Hindi, and Bangladeshi. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract. The extension contract has outlined the terms and condition according to the Collective agreement, Employment Act and Minimum Wage Order 2022.</p>

### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
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2019.01	Minor	4.75	12/04/2019	Closed (14.06.2019)
2019.02	Major	5.7.2	12/04/2019	Closed (20.05.2019)
2020.01	Minor	7.3.1	02/04/2020	Escalated to 'Critical' due to Reoccurrence of Minor Non-Conformity
2043087-202104-M1	Critical	7.3.1	09/04/2021	Closed (25/06/2021)
2043087-202104-M2	Critical	6.2.3	09/04/2021	Closed (25/06/2021)
2043087-202104-M3	Critical	3.6.2	09/04/2021	Closed (25/06/2021)
2043087-202104-M4	Critical	6.7.3	09/04/2021	Closed (25/06/2021)
2043087-202104-N1	Minor	2.2.2	09/04/2021	Closed (15/04/2022)
2043087-202104-N2	Minor	3.3.2	09/04/2021	Closed (15/04/2022)
2043087-202104-N3	Minor	7.11.3	09/04/2021	Closed (15/04/2022)
2187928-202204-M1	Critical	3.7.1	15/04/2022	Closed (02/07/2022)
2333425-202304-N1	Minor	3.3.2	14/04/2023	Closed on 10/05/2024
2333425-202304-N2	Minor	7.12.7	14/04/2023	Closed on 10/05/2024
2492732-202405-M1	Critical	3.6.1	10/05/2024	Closed on 25/06/2024
2492732-202405-N1	Minor	7.3.1	10/05/2024	Open

### 3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss SD Guthrie Berhad SOU 11 Kerdu POM and 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 (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Contractor	Sxxrxxxxxxxx Pxxxxx	Face to face
Contractor	Txxxx Mxxxx	Face to face
Contractor	SXXX Exxxxxxxx	Face to face
Local Communities	Head Village Kg. Bxxxx and Kg. Rxxxx	Face to Face
Local Communities	Head Community JKKKB Sxx Xxxxxx	Face to face
Local Communities	Tok Batin Xx Xxx	Face to face
Local Communities	FELDA Xxxxxx X	Face to face
Local Communities	Kampung Xx Xxxxx	Face to face
Local Communities	Tadika Kemas Sg Mai Estate	Face to face
School	SK LKTP Uxx Jxxxxx	Face to face
FFB Supplier	Gxx Xxxx Xxx	Face to face
Internal	Mill and Estate Workers (Local and Foreign)	Face to face
Internal	Gender Committee Representatives	Face to face
Internal	Union Representatives	Face to face

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b> Contractor</p> <p>The contractor has a good relationship with the company where they have been providing the service for many years. The contractor also mentioned that the award of contract was done through fair and unbiased tendering process. Payments were always made on timely manner. The management and staff of the operating units have also been very accommodating should there be any issues of concern. The operating units also actively provide trainings on RSPO especially with regards to legal, OHS, best practices and employees' welfare. Although a few challenges were faced in implementing the requirements due to limited knowledge and resources, the contractors have stated that they will do their best to comply.</p> <p>The company has also always invited the contractor's representative to attend the stakeholder meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any.</p> <p><b>Audit Team verification and response:</b></p> <p>No further issue.</p>
<b>2</b>	<p><b>Feedbacks:</b> Local Communities</p> <p>Good cooperation given by estate management team. Contribution not only monetary but also manpower and machinery were given if there is any assistance required. Relationship and contribution with the estate management were consistent rather than ad-hoc. Estate under SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) is known for offering job opportunity to the villager. No land encroachment</p>

	<p>from SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) estates. Some of smallholders in neighbouring village being the MSPO certified under Part 2: Smallholder Scheme (local palm oil sustainability scheme) and they are well aware of the requirement of the legal, OSH, environment, and social aspects. Frequent training and meeting have been conducted together with local communities in objectives to enhance awareness on RSPO and to discuss any issues occur with the management. Its commendable that the management continually engages with the community through consultation processes.</p>
	<p><b>Audit Team verification and response:</b> No further issue.</p>
3	<p><b>Feedbacks:</b> School</p> <p>The management consistently contributes to school activities such as providing routes within the estate area for 'Merentas Desa' events. The teachers mentions that the estates operations do not disrupt learning or activity in the school. The attendance of students from the estate is highly satisfactory, with over 90% attendance, facilitated by transportation provided by the estate to the school. The discipline and academic level of the students from the estate are also very satisfactory. The management always invites the principal to attend the estate's annual meeting or any estate ceremonies.</p>
	<p><b>Audit Team verification and response:</b> No further issue.</p>
4	<p><b>Feedbacks:</b> Estate and Mill Workers (Local and Foreign)</p> <p>Regular training on company's SOP, policies, safety and health, environmental and social aspects were conducted by operating unit. Employment contract and payslip were provided, and the salaries deposited into workers bank account. Wages are paid according to Minimum Wages Order 2022. PPE is provided at no cost and can be replaced by making a request to the estate management. Foreign workers retain possession of their passports. Workers are aware of the complaint and grievance channels available to them. The management has been very accommodative to the workers in term of welfare. With regards to welfare, housing facilities, water &amp; electricity supply were always maintained in good conditions. With the use of OPP application in smartphone, the reporting of housing defects or maintenance was very convenient. There has been no issue with regards to delivering the terms &amp; conditions stipulated in the employment contract so far.</p>
	<p><b>Audit Team verification and response:</b> No further issue.</p>
5	<p><b>Feedbacks:</b> FFB Supplier</p> <p>The FFB Suppliers stated that the mill has provided training pertaining to FFB quality and grading. They further indicated their comprehension of the price mechanism and the terms and condition in the contract agreement. Timely payments were also observed. In addition, they are cognizant of their ability to lodge complaints with the mill management at any time. It is worth noting that they maintain a positive and amicable relationship with the mill management.</p>
	<p><b>Audit Team verification and response:</b> No further issue.</p>
6	<p><b>Feedbacks:</b> Gender Committee Representatives</p> <p>They informed that no sexual harassment and violence cases reported since the last audit. Female workers understand the function of Gender Committee and aware the complaint mechanism if there are any issues occurred. They were treated equally without any discrimination by the management. The committee is tasked with planning annual activities for female workers to ensure a conducive living environment in the estate and during this activities they also can also know each other better, making easier to share any problems or thoughts. Among the important activity planned were pap smear check by Health Clinic, cooking contest, hari raya</p>

	celebration etc. The management has also been very supportive with the programmes in term of financial, facilities and other resources.
	<b>Audit Team verification and response:</b> No further issue.
<b>7</b>	<p><b>Feedbacks:</b> Union Representatives</p> <p>They informed that there are no outstanding issues with the estate and mill management. Regular meetings between the management and NUPW committee are conducted to address any matter arising from the workers. Worker's welfare including housing, salary payment and benefit are well taken care of by the estate and mill management.</p>
	<b>Audit Team verification and response:</b> No further issue.

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not Applicable as the estates have undergone second cycle of replanting.					

Previous land owner / user comment	
	<b>Feedbacks: N/A</b>
	<b>Audit Team verification and response: N/A</b>



### 3.5 Impartiality and conflict of interest

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

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

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that SD Guthrie Berhad SOU 11 Kerdu POM and Supply Bases has complied with the Malaysia National Interpretation 2019 of the RSPO P&amp;C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Sime Darby Plantations Berhad SOU 11 Kerdu POM and Supply Bases is remain certified.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> <b>NOR HALIS ABU ZAR</b>	<b>Name:</b> Shylaja Devi Vasudevan Nair
<b>Company Name:</b> <b>BSI SERVICES MALAYSIA SDN BHD</b>	<b>Company Name:</b> SD Guthrie Bhd
<b>Title:</b> <b>CLIENT MANAGER</b>	<b>Title:</b> Head, Sustainability Compliance Unit, Group Sustainability Dept.
<b>Signature:</b> 	<b>Signature:</b> <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
<b>Date: 25/06/2024</b>	<b>Date: 26/07/2024</b>

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#### Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<b>(C)</b> Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	The documents that are specified in the RSPO P&C were made available on site upon request at all the sampled operating units. Management documents related to sustainability available at each operating units visited during the audit upon request including land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, summary reports, company policies and continual improvement plans as well as management actions plans. Furthermore, annual sustainability report, sustainability policies, Human Right Charter documents, company statement and global documents are published in the company's website: <a href="https://www.sdguthrie.com/sustainability/reports-policies-and-statements/">https://www.sdguthrie.com/sustainability/reports-policies-and-statements/</a> . The website is found accessible for public user.	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Information is available in appropriate languages and accessible to relevant stakeholders (including internal and external stakeholder), provided through stakeholder meeting and social dialogue latest conducted at each specific operating unit. Stakeholder bulletin (i.e., complaint and grievance procedure, fire prevention, policies and RSPO requirements) and social dialogue reinforcement were discussed in the meeting with internal and external stakeholders. The meeting was given in by representative form each operating	Complied



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		<p>unit in Malay language which is understand by the relevant stakeholder. This has been verified through interview with sampled stakeholder conducted during the audit. Furthermore, information (in bi-lingual English and Malay) can be seen in the strategic area within estate and mill compound. Latest stakeholder meeting and social dialogue conducted at each operating unit are as below:</p> <p><b>Stakeholder Meeting</b></p> <table><tr><th>Estate/Mill</th><th>Date of Stakeholder Meeting</th></tr><tr><td>Kedau Estate and Kerdau POM</td><td>05/03/2024 (Kerdau POM combined meeting with Kerdau Estate)</td></tr><tr><td>Chenor Estate</td><td>14/02/2024</td></tr><tr><td>Sungai Mai Estate</td><td>06/03/2024</td></tr><tr><td>Mentakab Estate</td><td>11/01/2024</td></tr></table> <p><b>Social Dialogue</b></p> <table><tr><th>Estate/Mill</th><th>Date of Social Dialogue</th></tr><tr><td>Kedau Estate</td><td>03/05/2024</td></tr><tr><td>Kerdau POM</td><td>03/05/2024</td></tr><tr><td>Chenor Estate</td><td>04/05/2024</td></tr><tr><td>Sungai Mai Estate</td><td>19/04/2024</td></tr><tr><td>Mentakab Estate</td><td>19/04/2024</td></tr></table>	Estate/Mill	Date of Stakeholder Meeting	Kedau Estate and Kerdau POM	05/03/2024 (Kerdau POM combined meeting with Kerdau Estate)	Chenor Estate	14/02/2024	Sungai Mai Estate	06/03/2024	Mentakab Estate	11/01/2024	Estate/Mill	Date of Social Dialogue	Kedau Estate	03/05/2024	Kerdau POM	03/05/2024	Chenor Estate	04/05/2024	Sungai Mai Estate	19/04/2024	Mentakab Estate	19/04/2024	
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1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad)) has developed Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/04/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estate. While for procedure related for internal stakeholder was documented in the Sustainable Plantation Management System, Appendix 5, version 1 dated 01/11/2008 under section Flowchart and Procedures on Handling Internal Issues.</p> <p>Timeframe for internal and external communication to provide feedback within two weeks from the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation.</p> <p>The management have communicated the information to the relevant stakeholders during stakeholder meeting. Latest stakeholder meeting conducted at visited operating unit are as follows:</p> <table><tr><th>Estate/Mill</th><th>Date of Stakeholder Meeting</th></tr><tr><td>Kedau Estate and Kerdau POM</td><td>05/03/2024 (Kerdau POM combined meeting with Kerdau Estate)</td></tr><tr><td>Chenor Estate</td><td>14/02/2024</td></tr><tr><td>Sungai Mai Estate</td><td>06/03/2024</td></tr><tr><td>Mentakab Estate</td><td>11/01/2024</td></tr></table>	Estate/Mill	Date of Stakeholder Meeting	Kedau Estate and Kerdau POM	05/03/2024 (Kerdau POM combined meeting with Kerdau Estate)	Chenor Estate	14/02/2024	Sungai Mai Estate	06/03/2024	Mentakab Estate	11/01/2024	Complied
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		In addition, the management has established a mechanism as per Standard Operating Manual (SOM) said above for the relevant stakeholder to request estate and mill information. Should there be any request for information that are specified in the RSPO P&C from any stakeholders, record of request can be maintained in few ways such as Communication Logbook, and filing of correspondence documents e.g., email printout, and letter. There has been no request for information that are specified in the RSPO P&C from any stakeholders since the last assessment.	
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Refer Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, Procedure for External Communication, version 1, issue date 01/11/2008). The procedure has the detail about the process of handling complaints from stakeholders and the time frame for external communication to be dealt with. The time frame to provide feedback is within two weeks of the date of receipt for communication and within one week of the completion of the investigation. On top of the existing procedure, Grievance Response Standard Operating Procedure, version 2 dated 18/07/2022 established for handling grievance specific issues for internal and external stakeholders.</p> <p>All the above procedure has been communicated to the relevant stakeholder at each operating unit during stakeholder meeting. Latest stakeholder consultation meeting was conducted on 05/03/2024 (combined meeting for Kerdau Estate and Kerdau POM), 14/02/2024 (Chenor Estate), 06/03/2024 (Sungai Mai Estate) and 11/01/2024 (Mentakab Estate) Among the attendees were smallholders, local communities, government agencies, contractors, and representatives from nearby schools. Feedbacks was recorded in the minutes of meeting.</p>	Complied

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		<p>In addition, each operating unit has appointed a person responsible for handling any social issues to ensure the effective implementation of the procedures. The Mill Manager has appointed Mill Assistant Manager as the management system officer to handle any issue related to social. Whereas the Estate Managers have appointed the Senior Assistant Managers (Sungai Mai Estate, Kerdau Estate and Mentakab Estate) and Assistant Manager (Chenor Estate) to be in charge of social issues.</p> <p>Responsibility of the above appointed person are clearly stated in the appointment letter such as investigate complaints, keep the records of complaints, and assists in conducting the activity related to the social and welfare.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>List of stakeholders for internal and external parties maintained up to date as of 01/2024 at each visited operating unit and found listed stakeholder from various categories such as government/statutory bodies, contractor, local communities, contractors, supplier, and internal stakeholder including Union representatives. The stakeholder list is listed information on the name of stakeholders, contact name, address, and contact number/PIC.</p>	Complied
<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has addressed its policy for ethical conduct in Code of Business Conduct (COBC) and to be implemented in all business operations and transaction, including recruitment and contracts. The document is publicly available on the company's website. In the Code of Business Conduct (COBC), dated 02/2023, it mentions on core values and the way that the SD Guthrie Berhad (Formerly</p>	Complied

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		<p>known as Sime Darby Plantation Berhad) conduct the business. The business principles applied are as follows:</p> <ul style="list-style-type: none"> <li>• Health, Safety and Environment</li> <li>• Compliance</li> <li>• Working with Local Communities</li> <li>• Fair Business Practices</li> </ul> <p>Section 7 of the COBC states that ethics and management practices to should be align with standard of ethical behaviour such as avoiding conflicts of interest, guarding against bribery and corruption, no gift policy and prohibits any form or usage of corporate hospitality to influence business decision, donations and sponsorship, protecting group assets, accuracy of records of business transactions and financial information, proprietary and confidential information, personal data protection and competition and antitrust laws.</p> <p>Sime Darby has imposed the implementation of the COBC to all its contractors and vendors by signing the Vendors Integrity Pledge (VIP) document. Copies of the signed pledges were kept by all the operating units and made available for verification.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>At the operating unit level, the system to monitor is mainly involves regular check of contractors' legal compliance and employees' welfare by the management. A Contractor and Vendor Checklist was developed, and among of checklist items is to monitor compliance and the implementation of the policy and overall ethical business practice. Each operating unit conducts due diligence process using the checklist on monthly basis.</p>	Complied

		Apart from that, annual internal audit is also one of the methods to ensure that management is effectively monitoring the compliance and policy implementation by the counterparties. Internal audit for RSPO requirements and financial implementation (finance internal audit) is conducted to ensure the business practices is implemented.	
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) SOU 11 Kerdu POM Certification Unit continues to comply with all verified legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and HQ. The sampled mill and estates had obtained and renewed license and permits as required by the law. Among others the licenses/permit verified were:</p> <p>Kerdau Estate</p> <ol style="list-style-type: none"> <li>1. MPOB Licence #524696002000 valid from 01/11/2023 until 31/10/2024.</li> <li>2. Water Abstraction Licence #0156 valid until 31/12/2024</li> <li>3. Air Receiver #PH PMT 2801 valid until 20/06/2024</li> <li>4. Air Receiver #PH PMT 2814 valid until 20/06/2024</li> <li>5. Diesel #KPDNHEP TLH 600-5/2/03/86 valid until 11/06/2024</li> </ol> <p>Chenor Estate</p> <ol style="list-style-type: none"> <li>1. MPOB Licence #524796002000 valid from 01/12/2023 until 20/11/2024.</li> </ol>	Complied

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		<p>2. Nursery Licence #549938011000 valid from 01/06/2024 until 31/05/2025</p> <p>3. Diesel permit #KPDNHEP TLH 600-5/2/2 valid until 08/05/2025</p> <p>4. Air Receiver #PH PMT 2122 valid until 04/12/2024</p> <p>5. Weighbridge calibration #D066667 inspected by De Metrology dated 17/05/2023.</p> <p>Sg Mai Estate</p> <p>1. MPOB Licence #524697002000 valid from 01/11/2023 until 31/10/2024.</p> <p>2. Diesel #PKPDNHEP.PHG.JRT.600-5/3/243 (PA) PD valid until 07/08/2024</p> <p>3. Water Abstraction Licence #0129 valid until 31/12/2024</p> <p>4. Pressure Vessel #PH PMT 2834 valid until 10/07/2024</p> <p>5. Air Receiver tank #PH PMT 2835 valid until 10/07/2024</p> <p>6. Weighbridge #D147601 inspected by De Metrology inspected on 20/03/2024</p> <p>Mentakab Estate</p> <p>1. MPOB Licence #522397002000 valid from 30/04/2024 until 31/07/2024. The renewal was made for 3 month due to hectarage adjustment and will be standardize after the licence expired.</p> <p>2. Diesel #KPDHEP TLH600-5/2/324/81 valid until 24/08/2024.</p> <p>3. Water Abstraction Licence #0157 valid until 31/12/2024.</p> <p>4. Pressure Vessel #PH PMT 83307 valid until 02/07/2024</p>	
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		<p>5. Horizontal Air Storage Tank #PH PMT 3455 valid 23/04/2024</p> <p>6. Weighbridge #D066684 inspected by De Metrology inspected on 07/06/2023</p> <p>Kerdau POM</p> <p>1. MPOB Licence #540761004000 valid from 01/07/2023 until 30/06/2024</p> <p>2. DOE Licence #005105 valid until 30/06/2024</p> <p>3. Water Abstraction Licence #0155 valid until 31/12/2024</p> <p>4. Diesel permit #KPDNHEP TLH 600-5/2/13/94 valid until 26/07/2026</p> <p>5. Monorail Crane #PM PMA 82184 valid until 29/04/2025</p> <p>6. Boiler #PH PMD 80119 valid until 29/04/2025</p> <p>7. Steam Receiver #PH PMT 4159 valid until 29/04/2025</p> <p>8. Weighbridge calibration #D147316 inspected by De Metrology on 30/01/2024.</p> <p>9. Competence person #CePSWaM/242350 to Estate Assistant NRIC 931112-XX-XXXX. Refer Approval by DOE for Sharing the competence person with complex dated 24/03/2017 with reference number JAS.31/152/000/001.</p> <p>10. Competence person for CePPOME/was not available. Issue has been raised during internal audit dated 15/02/2024. The action taken, the nominees with NRIC 970608-XX-XXXX will attend the course on 24-28/06/2024. Refer approval of course application form.</p>	
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		11. Competence person #HQ/24/AGTES/00/22596 to Sustainability Executive NRIC 950124-XX-XXXX valid until 21/06/2024.	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The operating units have maintained compliance with legal requirements through established and implemented documented procedures, as outlined in the Estate/Mill Quality Management System, Level 2: Standard Operating Manual, specifically Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. This mechanism ensures adherence to legal and other requirements and is documented in the EQMS &amp; MQMS (Estate &amp; Mill Quality Management System), which is distributed to all operating units. The GSQM Department and respective operating units are responsible for identifying, managing, updating, and tracking legal requirements, as well as monitoring legal compliance status.</p> <p>Furthermore, all operating units maintain a Legal &amp; Other Requirements Register (LORR) that covers all necessary regulatory requirements. A legal register dated July 2023 lists additional applicable laws, including:</p> <ul style="list-style-type: none"> <li>• Minimum Wages Order 2022</li> <li>• Fire Service Act 1988 (Act 341) Amendment 2020</li> <li>• Human Resources Development Act 2001</li> <li>• Anti-Sexual Harassment Act 2021</li> <li>• Employees' Social Security (Amendment) Act 2022</li> <li>• Employees' Insurance System (EIS) (Amendment) Act 2022</li> <li>• Control of Supplies Act 1961</li> <li>• Employment (Amendment) Act 2022</li> </ul>	Complied

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2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.  - Minor compliance -	Legal or authorised boundaries are clearly demarcated and visibly maintained as per verification during site visit. Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through boundary marker (red/white painted with alternate ring) and physical boundary separated with construction of trenches and parameter road. This was confirmed through the field visit at found practiced was clearly visible. Boundary and monthly patrolling record was verified.	Complied
<b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained.  - Minor compliance -	Each operating unit within SOU 11 Kerdu maintains its own stakeholder list, which includes a comprehensive record of contracted parties. These stakeholder lists were updated on 01/2024. Information such as names and addresses of the contractors, as well as the contact person for each contractor. The lists were made available for verification at all the sampled units.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.  Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.  - Minor compliance -	SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has established Contractor & Vendor Management Procedures, dated 17/11/2021. The objectives of the procedures are as below: <ul style="list-style-type: none"> <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 and legal compliance.</li> <li>To provide guidance to Management on the processes of selecting and monitoring of C&amp;V.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <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 SOU 11 Kerdau</li> </ul> <p>The contract agreement/letter of award contains specific clauses on meeting applicable legal requirements which stated under Compliance with applicable laws and guidelines.</p> <p>Based on the samples contracts reviewed at each visited operating unit, there is a Vendor Integrity Pledge (VIP) comprising the Vendor Code of Business Conduct (VCOBC), covering aspects such as human rights, environment, safety and health and ethic and management practices.</p> <p>All contracted parties/vendors were required to sign Vendor Integrity Pledge (VIP) and adhere to the following requirements:</p> <ul style="list-style-type: none"> <li>- Vendor Code of Business Conduct (VCOBC)</li> <li>- All applicable laws and regulations related anti-bribery, fraud, and corruption.</li> </ul> <p>VCOBC includes a statement mandating that contracted parties/vendors comply with all laws and regulations in the countries where SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) operates.</p> <p>The operating units has conducted legal due diligence of all their contracted parties through internal audits, and performance review. Each operating unit maintains Contractor Master List which containing documents such as workers contractor list, payslip, EPF Form A, SOCSO contribution form, passport/permit, employment contract. The Contractor Master List were found updated on monthly basis. In addition, operating unit under SOU 11 Kerdau has</p>	
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		<p>conducted due diligence for the contracted parties using Checklist of Contractor and Vendor, which includes the following:</p> <ul style="list-style-type: none"> <li>- Documentation and records: Photocopy documents of contractor/vendor workers, monitoring validity workers documents at least once a month, ensure to keep copy of Vendor Integrity Pledge signed by the contractor/vendor.</li> <li>- Key Performance Index (KPI) and Vendor Performance Evaluation (VPE): KPI carried out by operating unit on monthly basis and VPE annual report to be conducted once a year or during renewal process. KPI and VPE are based on Appendix 2 and 3 of the Contractor &amp; Vendor Management Procedures (Date Approved: 17/11/2021)</li> <li>- Contractor/vendor workers must be aware on grievance mechanism, freedom of movement and OSH: Briefing to the workers of contractor at least once a year.</li> </ul> <p>Minimum requirement for employment contract for contractor/vendor workers: To verify valid employment contract which contains employment contract terms includes scope of work, location of working area, working hours, duration of employment, worker benefit, annual leave, sick leave, provision of PPE at no cost. Workers must understand the terms of employment contract.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has established the Vendor Integrity Pledge and Vendor Code of Business Conduct (VCOBC). Reflecting to the indicator 2.2.2, all contracted parties/vendors were required to sign Vendor Integrity Pledge (VIP) and adhere to the following requirements:</p> <ul style="list-style-type: none"> <li>- Vendor Code of Business Conduct (VCOBC)</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- All applicable laws and regulations related anti-bribery, fraud, and corruption.</li> </ul> <p>The VCOBC contains clauses disallowing child, forced and trafficked labour. It can be sighted under:</p> <p>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:</p> <ul style="list-style-type: none"> <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> </ul> <p>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</p>	
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		<p>countries they operate, unless in vocational and/or formal and structured apprenticeship, educational and training programmes.</p> <p>Based on contract samples reviewed at each visited operating unit, it was found that the contractor has signed the VIP and the documents have been presented to the auditor for verification. This was also confirmed through interview with sampled contractor during the audit. Refer to the samples record of workers contractor list in Contractor Master List, no young workers hired by the contractor in SOU 11 Kerdu.</p>	
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>The mill has established all the records of all directly sourced FFB. Sample of directly source FFB taken is as following:</p> <ol style="list-style-type: none"> <li>1. AXXXXX HXXXXX Sdn Bhd – MPOB License No: 8817XXXXXXX, Expiry Date: 30/06/2027.</li> <li>2. KXXXXXXX SXXXXXXX – MPOB License No: 5036XXXXXXX, Expiry Date: 31/10/2024.</li> <li>3. MXXX NXXX AXXXXX AXXX - MPOB License No: 4671XXXXXXX, Expiry Date: 30/04/2026.</li> <li>4. DXXXXXX VXXXXXX - MPOB License No: 8905XXXXXXX, Expiry Date: 31/12/2027.</li> </ol> <p>Refer Desktop Review Assessment for New OCP Suppliers for KKS Kerdu prepared by Group Sustainability &amp; Quality Management that detail on the required information of Directly Source FFB.</p>	Complied
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 Indicator 2.3.1.	<p>The mill has established all the records of all indirectly sourced FFB. Sample of indirectly source FFB taken is as following:</p>	Complied

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	- Minor compliance -	<p>1. LXXX HXX KXXXXX Enterprise – MPOB License No: 5428XXXXXXX, Expiry Date: 30/09/2024.</p> <p>2. SXX CXXXXXXXXX Sdn Bhd – MPOB License No: 5500XXXXXXX, Expiry Date: 31/05/2024.</p> <p>3. WXXXXXX MXXXXXX TXXXXXX – MPOB License No: 6214XXXXXXX, Expiry Date: 31/12/2024.</p> <p>4. GXXXXXX MXX OXX PXXXX Sdn Bhd – MPOB License No: 5831XXXXXXX, Expiry Date: 31/03/2025.</p> <p>Refer Desktop Review Assessment for New OCP Suppliers for KKS Kerdau prepared by Group Sustainability &amp; Quality Management that detail on the required information of indirectly Source FFB.</p>	
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>			
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	The business plan for the mill and estates under for SOU11 captured in the form of annual budget and the projection for 5 years projection from 2024 -2029. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX. As for the estates, the annual budget contains the crop projection and the finance allocation for field operation and administrations. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.	Complied
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	SOU11 Supply Base estates have prepared the replanting programme with minimum of 5 years projection and subject for annual review. Details of replanting programme for each operating units as per the following	Complied

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		Estate	Replanting Program, Ha, For the Year					
			2024	2025	2026	2027	2028	
		Kerdau Estate	69.26	195.87	150.23	0	0	
		Chenor Estate	63.06	126.95	135.72	97.19	0	
		Sg Mai Estate	125.70	191.19	78.34	110.71	135.85	
		Mentakab Estate	142.27	141.39	187.01	208.07	116.48	
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Sustainability Management Review Meeting (SMRM) carried out by respective estates and mill on annual basis. The agenda of meeting has included the elements of:</p> <ul style="list-style-type: none"> <li>i) Matters arising from previous meeting</li> <li>ii) Changes in regulations, standards, policies &amp; procedures in relation to sustainability management system</li> <li>iii) Review on operational performance &amp; product conformity</li> <li>iv) Review on management plans</li> <li>v) Results from audits and assessments</li> <li>vi) Stakeholder feedback and complaints</li> <li>vii) Resources for system implementation</li> <li>viii) Continual improvement plan</li> <li>ix) Conclusion/meeting outputs</li> </ul> <p>Date of SMRM carried out at respective operating units</p>						Complied



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		<table><tr><td>Operating unit</td><td>Date of meeting</td></tr><tr><td>Kerdau Estate</td><td>7/03/2024</td></tr><tr><td>Kerdau POM</td><td>11/03/2024</td></tr><tr><td>Chenor Estate</td><td>5/02/2024</td></tr><tr><td>Sg Mai Estate</td><td>23/01/2024</td></tr><tr><td>Mentakab Estate</td><td>15/03/2024</td></tr></table>	Operating unit	Date of meeting	Kerdau Estate	7/03/2024	Kerdau POM	11/03/2024	Chenor Estate	5/02/2024	Sg Mai Estate	23/01/2024	Mentakab Estate	15/03/2024	
Operating unit	Date of meeting														
Kerdau Estate	7/03/2024														
Kerdau POM	11/03/2024														
Chenor Estate	5/02/2024														
Sg Mai Estate	23/01/2024														
Mentakab Estate	15/03/2024														
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.															
3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Continuous improvement plan reviewed and discussed on annual basis during management review meeting at respective operating units. CAPEX/OPEX included for mainly related to process/productivity, environmental and social improvement. For example, CAPEX budgeted for estates and mill as per the following table:</p> <table><tr><td>Operating unit</td><td>Budget description</td></tr><tr><td rowspan="3">Chenor Estate</td><td>New roofing for worker’s quarters (constructed in 1986 – 20 units, 1995 – 34 units.</td></tr><tr><td>Chemical mixing area upgrading</td></tr><tr><td>Upgrading of road from main office to quarters (3000 metres)</td></tr></table>	Operating unit	Budget description	Chenor Estate	New roofing for worker’s quarters (constructed in 1986 – 20 units, 1995 – 34 units.	Chemical mixing area upgrading	Upgrading of road from main office to quarters (3000 metres)	Complied						
Operating unit	Budget description														
Chenor Estate	New roofing for worker’s quarters (constructed in 1986 – 20 units, 1995 – 34 units.														
	Chemical mixing area upgrading														
	Upgrading of road from main office to quarters (3000 metres)														

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		<div>Kerdau POM</div> <div>25 block workers housing (outside hall roofing)</div>		
		<div>Mentakab Estate</div> <div>Refurbishment and upgrading of worker's quarters (drain, septic tank, ceiling and roofing)</div> <div>New water treatment plant at Mentakab division</div>		
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b></p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The RSPO metric template version 2.1 is employed for reporting the metrics of SOU 11 Kerdau Certification Unit, encompassing economic, social, and environmental aspects. The data reporting period spans from January to December 2023 for social and environmental metrics, and for economic metrics, it covers January 2023 to December 2023, counting back from the audit month. Following a verification process with the input data, no discrepancies were identified in the reported data for all metrics during the specified period.</p>	Complied	
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.				
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) for the estate and mill has been established. SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) 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 11 as a guidance document to conduct estate operation. The estate also</p>	Complied	

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		<p>holds the Safety Work Procedure. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Palm Oil Mill holds two SOPs: Sustainable Plantation Management system (SPMS) version 1 dated 1/11/2008 and Mill Quality Management System version 1 dated 1/11/2008 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) continuously updated the SOP established. Among the updated SOP as follows:</p> <ol style="list-style-type: none"> <li>1. UM HSE Management System Manual, UM/HSE/MS/01</li> <li>2. First Aid in Workplace Procedure, UM/HSE/OCP/01</li> <li>3. Safety Harvesting Procedure, UM/HSE/OCP/02</li> <li>4. Personal Protective Equipment Procedure, UM/HSE/OCP/03</li> <li>5. Chemical Safety Management Procedure, UM/HSE/OCP/04</li> <li>6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05</li> <li>7. OSH Risk Management Procedure, UM/HSE/SE/01</li> </ol>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>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.</p>	Complied

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3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit. Reviewed the sampled monitoring records as follows:</p> <p>Kerdau Estate</p> <ul style="list-style-type: none"> <li>• Internal audit dated 16/01/2024</li> <li>• Estate Mature Upkeep Assessment Report dated 04-05/04/2024</li> <li>• Estate Structured Crop Recovery Assessment Report dated 04-05/04/2024</li> </ul> <p>Kerdau POM</p> <ul style="list-style-type: none"> <li>• Internal Audit dated 15/01/2024</li> <li>• Structured Oil Recovery Assessment (SORA) dated 01-05/04/2024</li> </ul> <p>Chenor Estate</p> <ul style="list-style-type: none"> <li>• Internal audit dated 16/01/2024</li> <li>• Estate Mature Upkeep Assessment Report dated 26/03 – 05/04/2024.</li> <li>• Estate Structured Crop Recovery Assessment Report dated 26/03 – 05/04/2024.</li> </ul> <p>Sg Mai Estate</p> <ul style="list-style-type: none"> <li>• Internal audit dated 18/01/2024.</li> <li>• Estate Mature Upkeep Assessment Report dated 24/04/2024.</li> </ul>	Complied
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		<ul style="list-style-type: none"> <li>Estate Structured Crop Recovery Assessment Report dated 03/04/2024.</li> </ul> <p>Mentakab Estate</p> <ul style="list-style-type: none"> <li>Internal audit dated 19/01/2024.</li> <li>Performance Monitoring Visit Summary Report dated 25/04/2024.</li> <li>Estate Mature Upkeep Assessment Report dated 26-27/03/2024.</li> <li>Estate Structured Crop Recovery Assessment Report dated 26-27/03/2024.</li> </ul>	
<b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting nor expending the existing ones conducted by each operating unit under SOU 11 Kerdu as of the date of the audit. 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 aspects. The social impacts arising from the mill and estate operations have remained consistent since last assessment.</p> <p>However, SOU 11 Kerdu has conducted a Social Impact Assessment (SIA) which is the report is made available to the audit team during the audit. The audit team observed that the assessment covers the whole Certification Unit covering the Kerdu POM, Kerdu Estate, Mentakab Estate, Chenor Estate and Sungai Mai Estate whereby the assessment has been conducted on 11 to 16/01/2016 by Group Sustainability Department. The findings of the assessment have been classified into 5 different category which are</p>	Complied

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		<p>good practices/findings, issues, complaints suggestion and other finding by stakeholders. Further verification also indicates that the assessment has focuses several key areas as follows (mention in attachment 1 of the SIA report):</p> <ul style="list-style-type: none"><li>• Housing/living condition</li><li>• Health facilities</li><li>• Environment impact (air/water quality)</li><li>• Health condition due to work/task</li><li>• Education (creche)</li><li>• Entertainment facilities (playground, hall, etc.)</li><li>• Working environment/condition (salary, etc.)</li><li>• Relationship with management</li><li>• PPE distribution</li><li>• Training/information sharing</li><li>• Annual event/celebration</li><li>• Welfare (goods, donation)</li><li>• Co-existence with migrant workers</li><li>• Complaint/grievance procedure (complaint channel, etc.)</li><li>• Union (annual meeting, efficiency)</li><li>• Transportation (to school, nearby stores, emergency)</li><li>• Harassment</li></ul>	
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		<p>Following to the key areas assessed, the audit team observed that several issues has been identified, example are as follows:</p> <p><b>Kerdau POM</b></p> <ol style="list-style-type: none"> <li>1) Management needs to expedite the process of attending their housing complaints.</li> <li>2) Parent requested the management to provide transportation to their children to go to school.</li> </ol> <p><b>Kerdau Estate</b></p> <ol style="list-style-type: none"> <li>1) Management to organize annual social event.</li> <li>2) Request to provide emergency transportation for the workers as some incidents happen late at night.</li> </ol> <p><b>Mentakab Estate</b></p> <ol style="list-style-type: none"> <li>1) Management to have more engagement initiatives with local communities.</li> <li>2) Management to monitor the safety aspects in the estate i.e., use of safety vest, etc.</li> </ol> <p><b>Sungai Mai Estate</b></p> <ol style="list-style-type: none"> <li>1) Some routes are gated, and the local community requested for certain time to unlock the gate.</li> <li>2) Stakeholder Engagement needs to be done annually to strengthen the relationship with surrounding community.</li> </ol> <p><b>Chenor Estate</b></p> <ol style="list-style-type: none"> <li>1) Harvesting and pruning workers requested to be provided with protective eyewear.</li> </ol>	
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		<p>2) Request proper transportation for children to go to school.</p> <p>Management plan has been established by each operating units and has been verified by the audit team. There is evidence that the management plan has been developed in participatory ways with the stakeholders. This has been verified during stakeholder consultation conducted with several stakeholder during the audit.</p> <p>Despite the above, there are good practices identified during the assessment that has been highlighted by the stakeholders, for example:</p> <ul style="list-style-type: none"> <li>• Relationship between workers from different nationalities, and between workers and management is good.</li> <li>• Management emphasizes strongly on safety and health.</li> <li>• Management opens up employment opportunity whenever there is any vacancy.</li> </ul> <p>List of stakeholders met and interview during the assessment is made available in the report covering stakeholders' groups i.e., local workers, foreign workers, contractors, relevant government agencies and local communities residing within the vicinity of the Certification Unit.</p> <p>SOU11 Kerbau has carried out an aspect and impact assessments relating to environmental impacts based on documents as following:</p> <p>a) Appendix 5.4.1b – Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register</p>	
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		<p>b) Appendix 5.4.1c – Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI</p> <p>c) Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE.</p> <p>There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However, the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered.</p> <p>The mill and estates have continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and Assistant Managers of mill and estate were identified as person-incharge of the programme(s) which were established upon review of the aspect and impact register.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Reflecting to the indicator 3.4.1, SOU 11 Kerdau has conducted a Social Impact Assessment (SIA) and the assessment covers the whole Certification Unit covering the Kerdau POM, Kerdau Estate, Mentakab Estate, Chenor Estate and Sungai Mai Estate whereby the assessment has been conducted on 11 to 16/01/2016 by Group Sustainability Department. Among the methods used in the assessment were interviews with stakeholders, site observations and documentation reviews. The assessment had covered the affected stakeholders such as contractors, government authorities, local communities, and workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community,</p>	Complied

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		<p>education, safety &amp; health, living condition, infrastructure and amenities and stakeholder engagement were taken into consideration in the assessment.</p> <p>For existing operation, the social impact management plans were developed and updated from time to time by each visited operating units. The updating of the management plan was based feedbacks and issues collected during various of meeting such as stakeholder meeting, social dialogue session, OSH meeting, trade union meeting, and complaint book. Social Impact Assessment Plan FY2024 has been developed by each operating unit which consists of list of issues, sources of issues, action plan, status, person in charge and date of commenced.</p> <p>The aspect and impact analysis for all the mill/estate operations are documented and revised annually recent being for 2024. In the comprehensive report, the study of aspect and impact are aimed to;</p> <ul style="list-style-type: none"><li>a) Plan to avoid negative impact and to promote positive impacts.</li><li>b) Reduction disposal of waste taking into consideration of social responsibilities.</li><li>c) Plan to reduce pollution and release of GHG</li><li>d) Development and implementations.</li></ul> <p>The aspect and impact covered the following activities/operations among others;</p> <table><tr><td></td><td>Estates</td><td></td><td></td></tr></table>		Estates			
	Estates						

			Activities		Activities			
		1	Poisoning of VOPs/ woodies	7	Vehicle maintenance by contractors			
		2	Circle spraying	8	EFB application			
		3	Management of empty containers	9	Fertilizer storage /application			
		4	Rat baiting	10	Grass slashing			
		5	Diesel Reception	11	Chemicals storage			
		6	Triple rinsing	12	Grading of FFB			
			Kerdau Palm Oil Mill					
			Activities		Activities			
		1	Effluent treatment	7	EFB storage			
		2	Engine room operations	8	Laboratory			
		3	Boiler operations	9	Workshop operations			
		4	CPO storage	10	Sterilization			
		5	Diesel Reception/storage	11	Chemicals storage			
		6	Triple rinsing	12	Scheduled wastes storage			
		3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Management plan was review and updated regularly in a participatory way based on feedbacks and issues collected during various of meeting such as stakeholder meeting, social dialogue			Complied	

	- Critical (Major) compliance -	<p>session, OSH meeting, trade union meeting, and complaint book. Social Impact Assessment Plan FY2024 has been developed by each operating unit which consists of list of issues, sources of issues, action plan, status, person in charge and date of commenced. As per verification, there is evidence that all issues that has been highlighted in the social impact assessment and management plan that has been established has been implemented based on document review. It has been further confirmed through interview with affected stakeholders that there are no repeating same issues for issues that has been highlighted in the assessment.</p> <p>Environmental Management Plans were developed, consisting of EAI &amp; EIE, Waste Management Plan, Water Management Plan, HCV Area &amp; Biodiversity, Energy Management &amp; Pollution Prevention and IPM Management which were available for verification. Latest review conducted on January 2024. Among the implantation of the environment management plan were mainly focused on environmental conservations and reductions of pesticides and fossil fuels. Among the implementation that were verified included the implementation of IPM in the estates such as the well-established beneficial plants, segregation of waste and disposal in accordance with legal requirements, bi-annual monitoring of smoke emission at the mill, well established buffer zones and periodic water quality monitoring among others. The Environment Management Plan is reviewed yearly, usually at the beginning of the year with inputs obtained from the management and workers representatives.</p>	
<b>Criterion 3.5:</b> A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has documented its employment procedures in two key documents, Migrant Worker Responsible Recruitment Procedure, dated 20/08/2021 and Guideline on the Recruitment of Local	Complied

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	<p>- Minor Compliance -</p>	<p>Workers, dated 07/12/2020. The purpose of this documents is to explain recruitment processes for both local and foreign workers including pre and post recruitment. Among other aspects, the procedure has outlined the selection, hiring, promotion, retirement, and termination of workers.</p> <p>As specified in the Migrant Worker Responsible Recruitment Procedure, SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) conduct selection and recruitment of migrant workers directly in the respective countries of origin. The recruitment of foreign workers will be carried out by the Workforce Management Unit (WMU) and HR department. WMU is responsible for conducting a briefing to potential workers on the job and provide the following information to the potential candidates during interview session:</p> <ul style="list-style-type: none"><li>- Job requirements</li><li>- Terms and condition of the work (e.g., wages, work hours, leave, benefit, safety, and health)</li><li>- Policy</li><li>- Grievance channels available</li></ul> <p>After the interview, workers will also be questioned about whether they have encountered any unethical practice, deceptive processes, or intimidation from any party involved.</p> <p>Section 3.2 of the procedure also mentions that where there is a requirement to use the services of recruitment agents (vendor) in the origin country, SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) shall enter into partnership agreements to ensure the process recruitment managed by recruitment agents is transparent and follow the rules and standard required by SD</p>	
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		<p>Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) .Other part mentions in the procedure are no charging of recruitment fees, transparent terms and conditions of employment in contracts, no withholding of passports or personal documents and grievance channels. The appendix in the procedure has summarizes the process flow of migrant workers recruitment from start of the recruitment process to the end.</p> <p>While for hiring local workers, section 4 of the Guideline on the Recruitment of Local Workers states that operating unit need to identify vacant positions in operations and request for necessary approvals to recruit new workers. Interested applicants are required to fill out an Application Form. They will be screened and shortlisted for an interview by Assistant Manager at the operating unit. During interview, the Assistant Manager is to brief the applicant the job, tasks, and expectations, in a language that they understand. List of successful applicant will be provided to the Manager for final approval for recruitment. Prior to commencing work, workers will be given an induction briefing and the briefing includes information on:</p> <ul style="list-style-type: none"> <li>• Employment contract terms and conditions</li> <li>• Company policies</li> <li>• Housing rules</li> <li>• General details on operations</li> </ul>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Based on interview with sampled workers and relevant stakeholder and documentation review, it was found that employment procedures as mentioned in indicator 3.5.1 were implemented and all the records are adequately maintained. Induction process is mandatory to be carried out by operating units to ensure company's</p>	Complied

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		<p>rules and regulations were socialized and acknowledged by the workers.</p> <p>Induction briefing, fill out application form, medical checkup, interview session, briefing on salary, employment terms and conditions, as well as information about grievance channel were conducted as per required in the procedures established. This was confirmed during interview with sampled workers comprising both of foreign workers from different origin countries and local workers. During the audit, stakeholder consultation was conducted with several neighbouring operating unit and local community. It was noted that job vacancies, if any, would be advertised near the locations of the operating units.</p> <p>At the operating units, application forms, interview assessment form, medical check-up report, copy of identification documents and employment contract for newly recruited employees were made available for verification. These are among the pre-requisites outlined in the recruitment procedure.</p>	
<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) have established OSH Risk Management Procedure UM/HSE/SP/01 effective date 09 March 2021. Risk were identified and assessed in accordance to the established HIRARC an also in compliance to legal requirements as stated below.</p> <p><u>Kerdau POM</u></p> <p>1. HIRARC was available to address all the risks and hazards associated to the operations in the estate. The sample HIRARC taken was reviewed on 26/02/2023 for Product Storage PK.</p>	Non-compliance

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		<p>Other HIRARC reviewed was Reception, Boiler and Oil Recovery Station.</p> <ol style="list-style-type: none"><li>2. Chemical Health Risk Assessment was conducted in the mill in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. CHRA Report Reference Number: HQ/14/ASS/00/00001-2020/7. Date of Assessment: 11/06/2020.</li><li>3. Medical Surveillance Programme has been performed successfully for the year 2024 on 22/03/2024 for 26 workers, found that all of them are fit.</li><li>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. Noise Risk Assessment (NRA) has been conducted on 11/03/2021 . NRA Report (Assessor Registration Number: HQ/94/PEB/00/08) available for verification. The recommendation stated by the assessor have been affectively addressed as verified.</li><li>5. An audiometric testing was done on 29/01/2024. 80 workers was examined and results indicated that there were 51 workers haven normal hearing, 27 employees hearing loss, 12 employees have hearing impairment and 12 employees falls under STS. 2 workers were recommended to OHD due to abnormal audiometric result. Retest was conducted on 25/04/2024 by OHD and all related report was available.</li><li>6. LEV Monitoring has been conducted from Assessor with reference number #HQ/16/JHII/00/23 with report reference number #HQ/16/JHII/00/23-2024/12 dated 25/03/2024.</li></ol>	
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		<p><u>Kerdau Estate</u></p> <ol style="list-style-type: none"><li>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Spraying, Manuring and Office Operations. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Latest Review was made on 05/02/2024</li><li>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. Chemical Hazard Risk Assessment dated 11/06/2020, Ref No: HQ/14/ASS/00/00001-2020/11.</li><li>3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification. The management has conducted the medical surveillance dated 06/03/2024, for 67 workers. All workers are declared fit to work by OHD.</li><li>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. Noise risk assessment dated 21/09/2021, conducted by assessor with registration number HQ/09/PEB/00/97. Refer report reference PH/05/04/897.</li><li>5. The audiometric was conducted on 17/03/2024 by Klinik HXXXXXX . There is 66 workers was examined, result indicated that 46 workers was normal, 20 workers having Hearing Loss and 2 workers fall under STS. Retest will be conducted at</li></ol>	
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		<p>08/05/2024 as per email evidence dated 02/05/2024 from Klinik HXXXXXX.</p> <p><u>Chenor Estate</u></p> <ol style="list-style-type: none"><li>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Manuring, Raking and Pruning. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Latest Review was made on 06/02/2024.</li><li>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. Chemical Hazard Risk Assessment dated 20/06/2020, Ref No: HQ/14/ASS/00/00001-2020/15.</li><li>3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification. The management has conducted the medical surveillance dated 20/03/2024, for 16 workers and 30/04/2024 for 4 workers. All workers are declared fit to work by OHD.</li><li>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. Noise risk assessment dated 20/09/2021, conducted by assessor with registration number HQ/09/PEB/00/97. Refer report reference PH/03/04/516.</li><li>5. The audiometric was conducted on 19-25/04/2024 by Klinik HXXXXXX . There is 27 workers was examined, result indicated that 10 workers was normal, 12 workers having Hearing Loss</li></ol>	
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		<p>and 5 workers fall under STS. Retest has been conducted at 30/04/2024 from Klinik HXXXXXX. Result founds in order.</p> <p><u>Sg Mai Estate</u></p> <ol style="list-style-type: none"><li>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Manuring, Spraying and Workshop. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Latest Review was made on 30/08/2022.</li><li>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. Chemical Hazard Risk Assessment dated 11/07/2020, Ref No: HQ/14/ASS/00/00001-2020/14.</li><li>3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification. The management has conducted the medical surveillance dated 01/02/2024, for 6 workers. All workers are declared fit to work by OHD.</li><li>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. Noise risk assessment dated 23/09/2021, conducted by assessor with registration number HQ/09/PEB/00/97. Refer report reference PH/03/04/1995.</li><li>5. The audiometric was conducted on 30/01/2024 by Klinik HXXXXXX . There is 47 workers was examined, result indicated that 27 workers was normal, 16 workers having Hearing Loss,</li></ol>	
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		<p>2 workers having Hearing Impairment and 5 workers fall under STS. Retest has been conducted at 16/03/2024 from Klinik HXXXXXX. Results found in order.</p> <p><u>Mentakab Estate</u></p> <ol style="list-style-type: none"><li>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Workshop and Clinic. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Latest Review was made on 21/03/2023.</li><li>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. Chemical Hazard Risk Assessment dated 06/06/2020, Ref No: HQ/14/ASS/00/00001-2020/16.</li><li>3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification. The management has conducted the medical surveillance dated 05/04/2024, for 36 workers. All workers are declared fit to work by OHD.</li><li>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. Noise risk assessment dated 22/09/2021, conducted by assessor with registration number HQ/09/PEB/00/97. Refer report reference PH/03/04/1773.</li><li>5. The audiometric was conducted on 18/03/2024 by Klinik HXXXXXX . There is 25 workers was examined, result indicated</li></ol>	
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		<p>that 19 workers was normal, 6 workers having Hearing Loss, 1 worker having Hearing Impairment and 5 workers fall under STS. Retest has been conducted at 07/05/2024 from Klinik HXXXXXX. Results found in order.</p> <p>CHRA Recommendation, SDS Requirements and HIRARC Risk control for manuring activities was not fully implemented.</p> <p>Sg Mai Estate</p> <p>During site visit at Field P21A Manuring Activities NK C10.5/30, it was found that there is no clean water was provided for manurer in that operation. Further interview with Mandore, there is also no portable eye wash. Interview with Tractor Driver, there is no designated area to place clean water in the trailer since load with fertilizer. It was not in line with:</p> <ol style="list-style-type: none"> <li>1. SDS stated on the Emergency Response Eye: Rinse with open eye properly, Skin: Clean with water and soap.</li> <li>2. CHRA Recommendation: Work unit: Manuring Operator: (e) Personal Hygiene, Clean water was provided during field operation and pesticide mixing area, To ensure clean water available when applying fertilizer on the field.</li> <li>3. HIRARC Manuring dated 26/11/2021: Existing Control: Bring an adequate supply of water.</li> </ol> <p>Thus, Major NC was raised.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Annual Health and Safety Plan available for the estate and mill are mostly implemented through Annual Training Program 2023 and</p>	Complied

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		<p>monitored via inspections to address the identified health and safety risks. The emphasis is on safe work by providing,</p> <ul style="list-style-type: none"><li>▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk.</li><li>▪ Awareness and understanding of workplace hazards and how to identify, report, and control them.</li><li>▪ Specialized training when their work involves unique hazards.</li></ul> <p>Besides formal classroom training, other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance in H&amp;S Plan of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"><li>• Internal Audit conducted by the Group Sustainability Department.</li><li>• Work Site Inspection (WSI) by site OSH Committee.</li><li>• Direct involvement of supervisor and rounds by Asst Manager.</li><li>• Safety incidents reporting via Rapid4.</li><li>• Health / medical surveillance.</li><li>• Chemical exposure monitoring, and</li><li>• Daily Monitoring Checklist such as PPE Checklist</li></ul> <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.</p>	
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<b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units visited has conducted training need analysis for all employee, management, and contractors. The need analysis was conducted based on the job designation and training required by the job type.</p> <p>Trainings was identified for management, employee and contractors and programmed throughout FY 2024. The training identified covers the safety and health, environmental and social aspect.</p> <p>Means implemented by SOU 11 certification units were to assess understanding of participants include:</p> <ul style="list-style-type: none"> <li>• Participants completing post-training evaluation/feedback form and give suggestions.</li> <li>• Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended.</li> </ul> <p>Random interviews with workers showed that they understood what RSPO is, the several subsidiaries' policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, etc.</p>	Complied

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3.7.2	Records of training are maintained. - Minor Compliance -	<div>The operating units maintained the training records conducted. Sample of the training records are as following: <u>Kerdau Estate</u></div> <table><thead><tr><th>Training</th><th>Date</th></tr></thead><tbody><tr><td>Hearing Conservation Training</td><td>03/05/2024</td></tr><tr><td>RSPO, HCV Training</td><td>16/04/2024</td></tr><tr><td>ERP Training</td><td>21/03/2024</td></tr><tr><td>First Aid Training</td><td>20/03/2024</td></tr><tr><td>Tractor Driver Training</td><td>21/03/2024</td></tr><tr><td>Inter Pump Spraying Training</td><td>13/03/2024</td></tr><tr><td>PPE &amp; Medical Access Training</td><td>16/03/2024</td></tr><tr><td>Fire Drill Training</td><td>15/02/2024</td></tr><tr><td>Safe Chemical Training</td><td>04/10/2024</td></tr><tr><td>Schedule Waste Training</td><td>04/01/2024</td></tr></tbody></table> <div><u>Kerdau POM</u></div> <table><thead><tr><th>Training</th><th>Date</th></tr></thead><tbody><tr><td>Chemical Handling Training</td><td>02/01/2024</td></tr><tr><td>Schedule waste training</td><td>02/01/2024</td></tr></tbody></table>	Training	Date	Hearing Conservation Training	03/05/2024	RSPO, HCV Training	16/04/2024	ERP Training	21/03/2024	First Aid Training	20/03/2024	Tractor Driver Training	21/03/2024	Inter Pump Spraying Training	13/03/2024	PPE & Medical Access Training	16/03/2024	Fire Drill Training	15/02/2024	Safe Chemical Training	04/10/2024	Schedule Waste Training	04/01/2024	Training	Date	Chemical Handling Training	02/01/2024	Schedule waste training	02/01/2024	Complied
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Chemical Handling Training	02/01/2024																														
Schedule waste training	02/01/2024																														



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		First Aid Training	15/02/2024	
		Fire drill / ERP Training	26/01/2024	
		Permit To Work Training	02/02/2024	
		RSPO Briefing	02/01/2024	
		Hearing Conservation Program	02/01/2024	
		HIRARC Training	23/01/2024	
		eSime + Training	23/01/2024	
		LO TO Training	23/01/2024	
		<u>Sg Mai Estate</u>		
		Training	Date	
		ERP Training	12/02/2024	
		PPE Training	12/02/2024	
		Chemical Handling Training	11/01/2024	
		Manuring Training	11/01/1024	
		First Aid Training	01/03/2024	
		RSPO Briefing	23/042024	
		SW Management	18/04/2024	
		HIRARC Training	16/04/2024	

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		Wages Calculation Briefing	25/04/2024	
		<u>Mentakab Estate</u>		
		Training	Date	
		PPE Training	04/05/2024	
		Workshop safety Training	23/04/2024	
		Manuring Training	23/04/2024	
		Tractor Driver Training	20/03/2024	
		Chemical Handling Training	05/01/2024	
		Hearing conservation training	03/01/2024	
		Harvesting training	26/01/2024	
		Schedule waste training	03/01/2024	
		Inter pump 16 training	16/01/2024	
		ERP Training	23/12/2023	
		First Aid Training	26/12/2023	
		<u>Chenor Estate</u>		
		Training	Date	
		Harvesting Training	20/03/2024	
		Audiometric and Medical Surveillance briefing	05/04/2024	

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		<table><tr><td>Hearing Conservation Training</td><td>05/04/2024</td></tr><tr><td>Training for Tractor Drivers</td><td>28/04/2024</td></tr><tr><td>Contractors Safety Training</td><td>01/02/2024</td></tr><tr><td>Rat Baiting Training</td><td>06/03/2024</td></tr><tr><td>Manuring Training</td><td>25/01/2024</td></tr><tr><td>Chemical Handling Training</td><td>20/03/2024</td></tr><tr><td>Inter pump / Spraying training</td><td>29/01/2024</td></tr><tr><td>Fire Drill Training</td><td>03/04/2024</td></tr><tr><td>First Aid Training</td><td>14/02/2024</td></tr></table>	Hearing Conservation Training	05/04/2024	Training for Tractor Drivers	28/04/2024	Contractors Safety Training	01/02/2024	Rat Baiting Training	06/03/2024	Manuring Training	25/01/2024	Chemical Handling Training	20/03/2024	Inter pump / Spraying training	29/01/2024	Fire Drill Training	03/04/2024	First Aid Training	14/02/2024	
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Fire Drill Training	03/04/2024																				
First Aid Training	14/02/2024																				
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The mill has designated personnel involved in supply chain certification and established a committee, as per the appointment letter signed by the Mill Manager. The identified personnel and committee members include Assistant Managers, Weighbridge Clerks, Operation Supervisors, Laboratory Analysts, FFB Graders, and Auxiliary Police. Refer Training dated 02/05/2024. Interview was conducted to sampled personnels and shows their awareness were in order.</p>	Complied																		
<b>Criterion 3.8:</b> Supply chain requirement for mills																					
(note: All supply chain requirements are considered as <b>Critical (C)</b> . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)																					
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the</p>	<p>Kerdau POM is under mass balance module. Thus, this indicator is not applicable.</p>	Not Applicable																		

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	<p>RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>				
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Kerdau POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified FFB as MB certified.</p>	Complied		
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date is reported in the summary in Table 10.</p>	Complied		
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <table><tr><td>Member Name</td><td>Kerdau Oil Mill</td></tr></table>	Member Name	Kerdau Oil Mill	Complied
Member Name	Kerdau Oil Mill				

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		<table><tr><td>Palm Trace ID</td><td>RSPO_PO1000000295</td></tr><tr><td>RSPO Membership Number</td><td>1-0008-04-000-00</td></tr><tr><td>Type of Business</td><td>Oil mill</td></tr></table>	Palm Trace ID	RSPO_PO1000000295	RSPO Membership Number	1-0008-04-000-00	Type of Business	Oil mill	
Palm Trace ID	RSPO_PO1000000295								
RSPO Membership Number	1-0008-04-000-00								
Type of Business	Oil mill								
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"><li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li><li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li><li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</li><li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li></ul>	<p>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <ul style="list-style-type: none"><li>a) Refer Sustainable Supply chain and Traceability Procedure dated January 2024 with reference number SD/GSD/202401/SCCS.</li><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, and SCCS Training records.</li><li>c) Mill have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated in Sustainable Supply chain and Traceability Procedure dated January 2024 Section 4.0 Responsibilities.</li><li>d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the Sustainable Supply chain and Traceability Procedure dated January 2024 Section 7.0 Receiving FFB at the Mill. Kerdau POM was MB Mill thus there is no issue on the contamination.</li></ul>	Complied						
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"><li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</li></ul>	<ul style="list-style-type: none"><li>i) The procedure to conduct annual internal audit is addressed in the Sustainable Supply chain and Traceability Procedure dated January 2024. Refer section 18.0 Internal Audit. Refer latest SCCS Internal Audit dated 15/01/2024. Based on the internal audit report and checklist, the elements of RSPO supply chain</li></ul>	Complied						

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	<p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>were adequately covered including the RSPO Market Communications and Claims elements.</p> <p>ii) There was one non-conformity raised from the internal audit. For non-conformity, corrective action has been established to rectify the lapse found. The status of the non-conformity was closed has been discussed in the management review meeting dated 07/03/2024.</p>	
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Kerdau POM maintain the daily records of all certified and uncertified FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details. The mill has maintained records of FFB received such as Delivery Notes and Weighbridge operator. Sample of FFB delivery records:</p> <p>Incoming FFB</p> <p>Certified Supply Base</p> <p>Company: SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad)</p> <ul style="list-style-type: none"> <li>• Estate: Kerdau Estate</li> <li>• Certified No: RSPO 745399</li> <li>• Date: 29/03/2024</li> <li>• Ticket Number: 16XXX</li> <li>• Vehicle Number: VFVXXXX</li> </ul>	Complied

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		<ul style="list-style-type: none"><li>• Field / Block: P 005A</li><li>• FFB Weight: 12.18 MT</li></ul> <p>Certified Supply Base</p> <p>Company: SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad)</p> <ul style="list-style-type: none"><li>• Estate: Sg Mai Estate</li><li>• Certified No: RSPO 745399</li><li>• Date: 29/03/2024</li><li>• Ticket Number: 16XXX</li><li>• Vehicle Number: VFXVXXX</li><li>• Field / Block: P 2010 A</li><li>• FFB Weight: 14.19 MT</li></ul> <p>Non-Certified 3<sup>rd</sup> Party FFB</p> <ul style="list-style-type: none"><li>• Company: HXX SXXX LXXXXXX</li><li>• Estate: HXX SXXX LXXXXXX</li><li>• Date: 29/03/2024</li><li>• Ticket Number: 21XXX</li><li>• Vehicle Number: BQCXXXX</li><li>• FFB Weight: 5.37 MT</li></ul> <p>Mechanism to handle non-conforming FFB and documents has been detailed up in the Procedure Sustainable Supply chain and Traceability Procedure dated January 2024 Section 11.0.</p>	
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3.8.8	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>Kerdau POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - MB</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer; BUYERXXXXXX</li> <li>b) The name and address of the seller; Kerdau POM</li> <li>c) The loading or shipment / delivery date; 13/12/2023</li> <li>d) The date on which the documents were issued; 13/12/2023</li> <li>e) RSPO Certificate Number: RSPO 745399</li> <li>f) A description of the product: CPO MB</li> <li>g) The quantity of the products delivered; 40.75 Mt</li> <li>h) Any related transport documentation; WTFXXXX</li> <li>i) A unique identification number: 020XXX</li> </ul> <p>PK - MB</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer; BUYERXXXXXX</li> <li>b) The name and address of the seller; Kerdau POM</li> <li>c) The loading or shipment / delivery date; 20/01/2024</li> <li>d) The date on which the documents were issued; 20/01/2024</li> <li>e) RSPO Certificate Number: RSPO 745399</li> <li>f) A description of the product: PK MB</li> <li>g) The quantity of the products delivered; 40.32 Mt</li> <li>h) Any related transport documentation; VAPXXXX</li> </ul>	Complied
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		i) A Unique identification number: 020XXX	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>Kerdu POM has established Standard Operating Procedure related Outsourcing Activities. Refer Sustainable Supply chain and Traceability Procedure dated January 2024 with reference number SDP/GSD/202401/SCCS Section 13.0.</p> <p>i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Kerdu POM was for CPO and PK transportation.</p> <p>ii. Sighted the contract agreement between SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) and contractor:</p> <p>a) Kerdu POM has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB Supplier Certified and Non-Certified. The contract agreement and details like MPOB licence were kept in the file.</p> <p>b) Refer Contract Agreement between SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) and CPO Transportation (NXXXXXXXXX IXXXXXXXXXX Sdn Bhd: Validity 01/11/2023 until 31/10/2024. There is no change of transporter as per last visit.</p> <p>c) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on agreements, transporter has no ownership of transported products and owned by buyer.</p> <p>d) The contract agreements specified that all transporters are required to fulfil and comply with applicable legal</p>	Complied

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		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 are no new contractors used for the handling of certified CPO and PK. As per stated in the procedure Section 13.5 "The Mill shall inform in advance the outsourced contractors if audit is deemed necessary by Certification Bodies (CB) and ensure that the contractors engaged provide relevant access for the CBs to their respective operations, system, and any and all information, when this is announced in advance."	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p>	<p>Record Keeping</p> <p>i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible.</p> <p>ii) The retention period for maintaining the traceability records is 3 years as stated in the January 2024 with reference number SDP/GSD/202401/SCCS, Section 5.4.</p> <p>iii) NA as the mill is using MB model.</p> <p>iv) For Mass Balance Module:</p> <p>a. Kerbau POM have kept all records and maintained balance of RSPO certified FFB and CPO and PK Deliveries.</p>	Complied

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	<p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</p>	<p>b. Certified CPO and PK despatch that are delivered was deducted from the material accounting system.</p> <p>c. Kerdau POM has delivered Mass balance from a positive stock. Verified through Mass Balance sheet and Palm Trace transaction.</p>							
3.8.13	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Verified OER and KER as below.</p> <table><tr><td>Month</td><td>OER</td><td>KER</td></tr><tr><td>Apr 2023 – Apr 2024</td><td>19.42</td><td>4.48</td></tr></table>	Month	OER	KER	Apr 2023 – Apr 2024	19.42	4.48	Complied
Month	OER	KER							
Apr 2023 – Apr 2024	19.42	4.48							
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Kerdau POM derives the extraction rates based on the actual extraction rate produced in the mill. Therefore, the accuracy is continuously maintained.</p>	Complied						
3.8.15	<p><b>Processing</b></p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>NA as the mill is using MB module.</p>	Not Applicable						
3.8.16	<p><b>Registration of Transactions</b></p>	<p>Registration of transactions</p>	Complied						

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	<p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>i) The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Verified the registration of CPO Sale and PK Sale.</p> <p>ii) RSPO Certified Volumes Sold under as different scheme or conventional was not able to be confirmed its shipping announcement by the buyer for the current licence period. However, we have indicated this to the client, and they have a system in place to remove the stocks at their respective time interval before end of licence period. For previous licence period, the removal was not done and this issue has been raised during internal audit dated 15/01/2024. The corrective action has been taken with evidence of correspondence email dated 18/03/2024 with GTM.</p>	
3.8.17	<p><b>Claims</b></p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
<b>General corporate communications</b>			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.</p>	<p>The SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has highlighted its RSPO membership and its commitment to the objectives and principles of RSPO via SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) (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."</p>	Complied

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4.2	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none"> <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>	<p>In the SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) (SDP) 2021 Sustainability Report, SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has stated their targets and progress, i.e., 100% RSPO certified estates and mills, Support 100% scheme smallholders in Indonesia to obtain RSPO certification and Maintain RSPO certification for 100% of smallholders in PNG and Solomon Islands.</p> <p>Details of RSPO Trademark License of Sime Darby Plantation as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, in the corporate communications, no usage of RSPO Trademark License.</p>	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	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> <li>• "We have been sourcing RSPO certified palm oil since (YEAR)."</li> </ul>	Evident from the SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) (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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	<ul style="list-style-type: none"> <li>• “We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year.”</li> <li>• “We have been RSPO certified since (YEAR).”</li> <li>• “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.”</li> <li>• “In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified.”</li> <li>• “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.”</li> <li>• “We are RSPO certified. Ask us for our RSPO certified products.”</li> </ul>		
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <ol style="list-style-type: none"> <li>“The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).”</li> <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> </ol> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall</p>	<p>As indicated on the RSPO website (<a href="https://rspo.org/members/1-0008-04-000-00/">https://rspo.org/members/1-0008-04-000-00/</a>), SD Guthrie Berhad (Formerly known as 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.</p>	Not Applicable

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	be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".		
<b>Product-specific communications</b>			
<b>5.1 General</b>			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the UoC does not make on-pack claims. However, it has been noted that off-pack claim is made by the UoC through shipping documents and invoices, specifically for RSPO-certified Crude Palm Oil (CPO) and Palm Kernel (PK). Additionally, an off-pack claim is also stated in Sime Darby Plantation's (SDP) 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.	<p>Details of RSPO Trademark License of SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label. Consequently, further assessment of this requirement cannot be conducted.</p>	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

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5.1.5	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> <li>• RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field.</li> <li>• Both parties shall inform their certification body in writing about the agreement.</li> <li>• The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer.</li> </ul> <p><b>Auditor notes:</b></p> <p style="color: red;">This requirement is not applicable if it is RSPO P&amp;C and SCC audits</p>	As Kerdau Palm Oil Mill processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable
5.1.6	<p>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</p> <p><b>Auditor notes:</b></p> <p style="color: red;">This requirement is not applicable if it is RSPO P&amp;C and SCC audits</p>	As Kerdau 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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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.	<p>Kerdau POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - MB</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer; BUYERXXXXXX</li> <li>b) The name and address of the seller; Kerdau POM</li> <li>c) The loading or shipment / delivery date; 13/12/2023</li> <li>d) The date on which the documents were issued; 13/12/2023</li> <li>e) RSPO Certificate Number: RSPO 745399</li> <li>f) A description of the product: CPO MB</li> <li>g) The quantity of the products delivered; 40.75 Mt</li> <li>h) Any related transport documentation; WTFXXXX</li> <li>i) A unique identification number: 020XXX</li> </ul> <p>PK - MB</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer; BUYERXXXXXX</li> <li>b) The name and address of the seller; Kerdau POM</li> <li>c) The loading or shipment / delivery date; 20/01/2024</li> <li>d) The date on which the documents were issued; 20/01/2024</li> <li>e) RSPO Certificate Number: RSPO 745399</li> <li>f) A description of the product: PK MB</li> </ul>	Complied

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		g) The quantity of the products delivered; 40.32 Mt h) Any related transport documentation; VAPXXXX a) A Unique identification number: 020XXX	
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.	Kerdau POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:  CPO - MB a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; Kerdau POM c) The loading or shipment / delivery date; 13/12/2023 d) The date on which the documents were issued; 13/12/2023 e) RSPO Certificate Number: RSPO 745399 f) A description of the product: CPO MB g) The quantity of the products delivered; 40.75 Mt h) Any related transport documentation; WTFXXXX i) A unique identification number: 020XXX  PK - MB a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; Kerdau POM c) The loading or shipment / delivery date; 20/01/2024 d) The date on which the documents were issued; 20/01/2024	Complied

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		e) RSPO Certificate Number: RSPO 745399 f) A description of the product: PK MB g) The quantity of the products delivered; 40.32 Mt h) Any related transport documentation; VAPXXXX a) A Unique identification number: 020XXX	
5.2.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> <li>• If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation.</li> <li>• If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2.</li> </ul>	As Kerdau Palm Oil Mill processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable
<b>5.3 On pack claims</b>			
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	<p>Details of RSPO Trademark License of SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) as below:</p> <ul style="list-style-type: none"> <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.	
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> <li>• RSPO IP/SG CERTIFIED*</li> <li>• Contains RSPO IP/SG palm oil*</li> <li>• Contains RSPO certified palm oil (IP/SG)*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> <li>• RSPO MIXED*</li> <li>• Contributes to the production of RSPO certified palm oil*</li> <li>• Contains RSPO certified palm oil (MB)*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
	<p>C) For Partially Certified Products:</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) as below:</p>	Complied

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	<ul style="list-style-type: none"> <li>• RSPO 50% MIXED*</li> <li>• Contains at least 50% RSPO certified palm oil*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	
	<p>D) For Products covered with Book and Claim (B&amp;C):</p> <ul style="list-style-type: none"> <li>• RSPO CREDITS*</li> <li>• Supports the production of RSPO certified palm oil*</li> <li>• Contains palm oil covered by the purchase of RSPO Credits*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	<p>Details of RSPO Trademark License of SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been</p>	Complied

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		made. Consequently, further assessment of this requirement cannot be conducted.	
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	<p>Details of RSPO Trademark License of SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	<p>Details of RSPO Trademark License of SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	<p>Details of RSPO Trademark License of SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Mass Balance palm oil content</b>			
	95% of the palm oil content must be RSPO MB-certified.	Oil palm content for CPO and PK is 100% RSPO MB certified. Non-certified FFB is come from external crop and since Kerdau POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Kerdau POM only applies MB model, and the conventional CPO are downgraded from MB whenever demanded. Non-certified FFB is come from external crop and since Kerdau POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
<b>Messaging</b>			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> <li>[Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain.</li> <li>The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> </ul>	No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Kerdau POM is producing crude palm product and does not involve in any labelling of end product.	Complied

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Product-Specific Communications Labelling		
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> <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>	<p>No messaging involved since Kerdau POM is producing crude palm product and does not involve in any labelling of end product.</p> <p>Complied</p>
Principle 4: Respect community and human rights and deliver benefits		
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.		
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) established the Group Sustainability &amp; Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding &amp; no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020. Under section 3.2.1 of HRC stated that the company's commitment on eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking, and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. Furthermore, the company is committed to provide decent and fair wages, reasonable working hours with adequate</p> <p>Complied</p>



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		<p>rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs.</p> <p>Aside the above, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) respect and safeguard human rights, nation of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad). This policy is applied to all stakeholders affected by the business activities and relationships including directors, employees, counterparties, business partners, workers in our operations and supply chains, and communities surrounding our operations.</p> <p>All the above policies were communicated to the employees during induction training for new employees and morning muster. While for external stakeholder, the policies were communicated during stakeholder meeting at each visited operating units as below:</p> <table><tr><th>Estate/Mill</th><th>Date of Stakeholder Meeting</th></tr><tr><td>Kedau Estate and Kerdau POM</td><td>05/03/2024 (Kerdau POM combined meeting with Kerdau Estate)</td></tr><tr><td>Chenor Estate</td><td>14/02/2024</td></tr><tr><td>Sungai Mai Estate</td><td>06/03/2024</td></tr><tr><td>Mentakab Estate</td><td>11/01/2024</td></tr></table>	Estate/Mill	Date of Stakeholder Meeting	Kedau Estate and Kerdau POM	05/03/2024 (Kerdau POM combined meeting with Kerdau Estate)	Chenor Estate	14/02/2024	Sungai Mai Estate	06/03/2024	Mentakab Estate	11/01/2024	
Estate/Mill	Date of Stakeholder Meeting												
Kedau Estate and Kerdau POM	05/03/2024 (Kerdau POM combined meeting with Kerdau Estate)												
Chenor Estate	14/02/2024												
Sungai Mai Estate	06/03/2024												
Mentakab Estate	11/01/2024												

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		Reflecting to the above, feedback received from stakeholders' consultation conducted during the audit with sampled workers and several external stakeholders found, there is no issue raised related to the human right at each visited operating unit. During the interview with some of the workers (both local and migrant), they mentioned that they were aware of such policy and commitments by SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) and the management always remind about it during morning muster and other training or meeting. They also provided with training and reminded during morning muster.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) prohibits any form of violence or harassment in their operation as per the above-mentioned policies. Based on interview with sampled workers and gender committee representatives, there has been no case reported with regards to violence and harassment. No harsh or insulting words are in used for giving orders to do the operation tasks, have been reported by workers. Most of the workers gave feedback that they are comfortable working at SOU 11 Kerdau. Should there be any such case, it can be addressed in accordance with the SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad)'s Standard Operating Procedure of Suara Kami Helpline, dated 15/04/2020.	Complied
<b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has established procedure for complaint and grievance which is open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-	Complied

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	<p>- Critical (Major) compliance -</p>	<p>blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>Procedure for complaint and grievance has been established and documented in Grievance Response Standard Operating Procedure dated 18/07/2022. The procedure specified that several methods to make any complaint such as whistleblowing, workers helpline, suara kami helpline, informal grievances received at operating unit level through Region HR, careline or gender representative and through email that will be handle by Grievance units. For suara kami platform it was guided with the procedure entitled Standard Operating Procedure of Suara Kami Helpline dated 15/04/2022.</p> <p>The above established mechanism is able to resolve the disputes in a timely manner. As per specified in the procedure, the allocated timeframe to resolve the disputes are based on case classification as outlined in the section 3.1.4 and 3.3 of Standard Operating Procedure of Suara Kami and Grievance Response Standard Operating Procedure, respectively. Typically, disputes for non-urgent issue or cases will resolve within 14 working days upon receipt. Furthermore, SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has also developed system to handled social issues, which include:</p> <ol style="list-style-type: none"> <li>1. Social dialogue tool kit</li> </ol> <p>This session is about management and workers engagement between representative of workers, and employer (operating unit management) to resolve workplace and living condition issues through social dialogue. This dialogue frequency will be done every once a month. The issues that been raised during this dialogue will be recorded under a tracker. This tracker will be captured in the dashboard and available to RGM and RCEO</p>	
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		<p>2. Oil Palm Pal (OPP)</p> <p>This OPP is a digitalized data management, used to capture all complaint/request for repair of workers houses and monitor progress of repair works till completion.</p> <p>It was observed that for the complaints against the top management of the estate/mill or complaint from internal and external parties, such process shall be covered within the whistleblowing channel i.e., Whistleblowing Charter Framework dated 11/2023 (<a href="https://www.simedarby.com/operating-responsibly/whistleblowing#:~:text=Acting%20in%20Good%20Faith,inclusing%20legal%20action%2C%20where%20applicable).">https://www.simedarby.com/operating-responsibly/whistleblowing#:~:text=Acting%20in%20Good%20Faith,inclusing%20legal%20action%2C%20where%20applicable).</a> Whistleblowing channel which is established as a channel for managing a reported complaint through a secure and accessible whistleblowing channel, transparent investigation and provide protection.</p> <p>Verification on the Suara Kami report, OPP report and issues raised in Social Dialogue at each visited operating unit, it was found that the complaint and grievance were attended to in a timely manner as per specified in the procedure. Interview conducted with sampled of workers including workers representative from different countries indicated that management of each visited operating unit has acted on reported grievance cases. The workers also know the purpose of Suara Kami, OPP, Social Dialogue and whistleblowing channel and found that the contact number/hotline number were displayed at their house. For OPP they can scan the QR code using each individual worker's mobile phone.</p>	
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4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The procedure as mentioned in the indicator 4.2.1 has been briefed and trained to staff and the workers. The same procedure has been briefed to the newly employed workers during induction course. Evidence of the training and briefing conducted are made available for verification during the audit. Observed that the policy is posted on the notice wall at the workers housing.</p> <p>Furthermore, the level of the understanding for the workers on the policy and procedure relating to protection of whistle-blowers and complainant is sufficient whereby the workers are able to properly demonstrate the procedure as verified during interview with several workers consists of Malaysian, Indonesian, Bangladeshi, Nepalese, and Indian workers. There are no illiterate parties has been identified for each operating units. For stakeholders, it was found that they can demonstrates their understanding on the complaint mechanism in the procedure as verified during stakeholder consultation.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has developed its own online complaint platform called Oil Palm Pal (OPP) for workers to utilized using their smartphones. The complaints will then be registered in a tracking system called Social Dialogue Tracking System. This enables the management to record the complaints and monitor its action progress. A meeting call Social Dialogue Meeting is also conducted once a month between the management and the workers representatives. When interviewed, the workers found to be very well versed in explaining how to use the OPP. The outcomes from this meeting are also registered in the tracking system. Among the information available in the system is details of complaints, name of complainant, action to be taken and timeframe. Verification of sampled issues and interview with</p>	Complied

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		workers confirmed that all the complaints/grievances were acted upon on timely manner.	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Reflecting to finding in indicators above, the management unit did recognize rights for the complainants to access independent legal and technical advice. Based on the interview with the workers, there are aware they may independent legal and technical advice from third party mediator such as embassy, labour department and other government agencies.</p> <p>As mentioned in Grievances Response Standard Operating Procedure dated 18/07/2022, the negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	Complied
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>All operating unit in SOU11 Kerbau has committed to contribute to local development in consultation with the local communities. Verification made during the audit showed that contribution to local communities' development is conducted on a case by case and that this is done following the stakeholder meeting of which the matters of the needs is brought up by the stakeholders. Following to such request, further clarification and details of the request is sought and subject to management approval. For any request that has been</p>	Complied

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		<p>approved, the stakeholders are then be informed and that the contribution is executed accordingly.</p> <p>Based on records and stakeholder consultation conducted during the audit, the audit team has verified the contribution to community development made by operating unit. For example, as below:</p> <ul style="list-style-type: none"> <li>• Kerdau Estate: Community work in the cemetery area with the indigenous community (orang asli) in field P2011E on 27/02/2024.</li> <li>• Chenor Estate: Preparing a route for 'Merentas Desa' in the field area on 25/04/2024 and assistance with PA system for the neighbouring estate.</li> <li>• Sungai Mai Estate: Providing an alternative route for indigenous residents (orang asli) during floods season and allowing the use of estate roads for the transportation of DDB from the indigenous village area.</li> <li>• Kerdau POM: Repairing the main road to facilitate smallholders to despatch FFB to the mill.</li> </ul>	
<b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>It was found that oil palm activities by the mill and estates under SOU 11 Kerdau do not diminish the land use rights of other users. There is no evidence found through open-source platform (e.g.: website, news, report, etc.) that land conflict was arise.</p> <p>Evidence of legal ownership, history of land tenure and the actual legal use of the land has been verified during the audit as follow:</p> <p><b>Kerdau Estate</b></p> <p>The estate holds a total of 7 land titles as per samples sighted as</p>	Complied

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		<p>following:</p> <ul style="list-style-type: none"> <li>- Land title #HSD 5XXX; Lot # PT 5XX; District: Temerloh; Subdistrict: Mukim Kerdau; Area: 4, XXX.XXX ha</li> <li>- Land title #GRN 7XXX; Lot # 1XXX; District: Temerloh; Sub-district: Mukim Jenderak; Area: 3XX.XXXX ha</li> <li>- Land title #GRN 8XXX; Lot # 1XXX; District: Temerloh; Sub-district: Mukim Jenderak; Area: 8X.XXX ha</li> </ul> <p><b>Mentakab Estate</b></p> <p>The estate holds a total of 22 land titles as per samples sighted as following:</p> <ul style="list-style-type: none"> <li>- Land title # 9XXX; Lot # 1XX; District: Temerloh; Sub-district: Mukim Mentakab; Area: 1X.XXXX ha</li> <li>- Land title # 9XXX; Lot # 1XXX; District: Temerloh; Sub-district: Mukim Semantan; Area: 2.XXXX ha</li> <li>- Land title # 7XXX; Lot # 1XXX; District: Temerloh; Sub-district: Mukim Semantan; Area: 1XX.XXXX ha</li> </ul> <p><b>Chenor Estate</b></p> <p>The estate holds a total of 3 land titles sighted as following:</p> <ul style="list-style-type: none"> <li>- Land title # 7XX; Lot # 4XX; District: Maran; Sub-district: Mukim Chenor; Area: 1XX.XXXX ha</li> <li>- Land title # 7XX; Lot # 4XX; District: Maran; Sub-district: Mukim Chenor; Area: 4XX.XXXX ha</li> <li>- Land title # 5XXX; Lot # 3XXX; District: Maran; Sub-district: Mukim Chenor; Area: 1,XXX.XXXX ha</li> </ul>	
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		<b>Sungai Mai Estate</b> The estate holds a total of 8 land titles sighted as following: <ul style="list-style-type: none"> <li>- Land title # 9XXX; Lot # 7XX; District: Jerantut; Sub-district: Mukim Pedah; Area: 1.XXXX ha</li> <li>- Land title # 4XX; Lot # 7XX; District: Jerantut; Sub-district: Mukim Burau; Area: 3XX.XXXX ha</li> <li>- Land title # 1XXXX; Lot # 9XX; District: Jerantut; Sub-district: Mukim Pulau Tawar; Area: 2XX.XXXX ha</li> <li>- Land title # 5XXX; Lot # 1XXX; District: Temerloh; Sub-district: Mukim Jenderak; Area: 6XX.XXX ha</li> </ul>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>As reflected earlier in indicator 4.4.1, all estates under SOU 11 Kerbau have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).</p> <p>Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.</p>	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	<p>As reflected earlier in indicator 4.4.1, all estates under SOU 11 Kerbau have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).</p>	Complied

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	- Minor compliance -	Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	
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 -	As reflected earlier in indicator 4.4.1, all estates under SOU 11 Kerdu have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).  Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	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 -	As reflected earlier in indicator 4.4.1, all estates under SOU 11 Kerdu have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).  Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	As reflected earlier in indicator 4.4.1, all estates under SOU 11 Kerdu have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is	Complied

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	- Critical (Major) compliance -	<p>belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).</p> <p>Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.</p>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>As reflected earlier in indicator 4.4.1, all estates under SOU 11 Kerdu have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).</p> <p>Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.</p>	Complied
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>As reflected earlier in indicator 4.4.1, all estates under SOU 11 Kerdu have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).</p> <p>Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.</p>	Complied

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4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>As reflected earlier in indicator 4.4.1, all estates under SOU 11 Kerdu have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).</p> <p>Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.</p>	Complied
<p><b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	As verified through stakeholders' consultation and boundary verification at visited estate under SOU 11 Kerdu, there has been no new planting on local people's land since the last assessment.	Complied
4.5.2	<p><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.</p> <p>- Critical (Major) compliance -</p>	As verified through stakeholders' consultation and boundary verification at visited estate under SOU 11 Kerdu, there has been no new planting on local people's land since the last assessment.	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement	As verified through stakeholders' consultation and boundary verification at visited estate under SOU 11 Kerdu, there has been no new planting on local people's land since the last assessment.	Complied

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	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 -		
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	As verified through stakeholders' consultation and boundary verification at visited estate under SOU 11 Kerdau, there has been no new planting on local people's land since the last assessment.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	As verified through stakeholders' consultation and boundary verification at visited estate under SOU 11 Kerdau, there has been no new planting on local people's land since the last assessment.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	As verified through stakeholders' consultation and boundary verification at visited estate under SOU 11 Kerdau, there has been no new planting on local people's land since the last assessment.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	As verified through stakeholders' consultation and boundary verification at visited estate under SOU 11 Kerdau, there has been no new planting on local people's land since the last assessment.	Complied

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4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	As verified through stakeholders' consultation and boundary verification at visited estate under SOU 11 Kerdau, there has been no new planting on local people's land since the last assessment.	Complied
<p><b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p> <p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under SOU 11 Kerdau. This has also been evident through interview with the local communities.</p>	Complied
4.6.2	<p><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.</p> <p>- Critical (Major) compliance -</p>	SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad)s 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	Complied

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		<p>calculation and distribution to the affected parties will be determined by Land Management Department.</p> <p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under SOU 11 Kerdu. This has also been evident through interview with the local communities.</p>	
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under SOU 11 Kerdu. This has also been evident through interview with the local communities.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under SOU 11 Kerdu. This has also been evident through interview with the local communities.</p>	Complied
<b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied

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		There is no new planting and acquisition on the new land planned or currently in progress, made by operating units under SOU 11 Kerdau for the coming future project. This has been verified through field visit and interview with stakeholders which consists of local communities and neighbouring estates. The land is belonged to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).	
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p> <p>There is no new planting and acquisition on the new land planned or currently in progress, made by operating units under SOU 11 Kerdau for the coming future project. This has been verified through field visit and interview with stakeholders which consists of local communities and neighbouring estates. The land is belonged to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	There is no customary right land for all operating unit under SOU 11 Kerdau. Each visited operating unit has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).	Complied



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		Further verification during interview with sampled of the relevant stakeholders which consists of smallholders, local communities and neighbouring estates confirms that there are no land dispute issues.	
<b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.  - Minor compliance -	There is no customary right land for all operating unit under SOU 11 Kerdu. Each visited operating unit has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).  Further verification during interview with sampled of the relevant stakeholders which consists of smallholders, local communities and neighbouring estates confirms that there are no land dispute issues.	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 -	There is no customary right land for all operating unit under SOU 11 Kerdu. Each visited operating unit has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).  Further verification during interview with sampled of the relevant stakeholders which consists of smallholders, local communities and neighbouring estates confirms that there are no land dispute issues.	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	There is no customary right land for all operating unit under SOU 11 Kerdu. Each visited operating unit has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No	Complied

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	rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	land dispute as the land is belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).  Further verification during interview with sampled of the relevant stakeholders which consists of smallholders, local communities and neighbouring estates confirms that there are no land dispute issues.	
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 -	There is no customary right land for all operating unit under SOU 11 Kerbau. Each visited operating unit has documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad).  Further verification during interview with sampled of the relevant stakeholders which consists of smallholders, local communities and neighbouring estates confirms that there are no land dispute issues.	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region. As the mill is using MB module, the mill received both certified and non-certified FFB. Nonetheless, with regards to non-certified FFB, the suppliers are only those from plantations and collection centres. The FFB supplier were listed in the POM FFB Supplier list.	Complied
5.1.2	<b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Those who are interested in selling their FFB to the mill must apply to the Outside Crop Purchasing (OCP) unit located at HQ, Kuala Lumpur. The unit will then make a due diligence by obtaining legal documents and site visit of the applicant's plantation before granting the approval. Along this process, the unit will have an	Complied

		informal discussion to explain the pricing mechanism. If both parties agree, a contract agreement will then be issued which normally valid for one year. Example of FFB purchase agreement checked; ref. no. P/P/1123/FFB04546L under Sxx Kxxxx Cxxxxxxxxx Sdn Bhd dated 1/1/2024.	
5.1.3	<b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	The FFB pricing was stated in Section 8 of the contract, Pricing of FFB under Third Schedule. The calculation method of the pricing was basically influenced by MPOB market price. Verification of the contract agreements showed that all the FFB suppliers have agreed with the pricing through signing.	Complied
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. - Critical (Major) compliance -	No binding contract between the mill and out-growers which includes finance, loans/credit, and repayment through FFB price reduction for replanting and/or other support mechanisms. Thus, this indicator is not applicable.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Verification of the terms and conditions of the sampled contracts showed that the contracts were fair, legal, and made transparent to the contractors. The agreed timeframe of the contract was stated under Section 7 of the contract.	Complied
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 -	Payments are broken down as defined under the First Schedule/Attachment 1 of the agreed contract. The payments were handled at HQ level and based on verification of the payment vouchers; the payments were made on timely manner.	Complied

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5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Weighbridges were calibrated annually, and evidence of calibration certificates were available with the following details: Serial no. B226072084, calibration ref. D147316 dated 30/1/2024, model: IND560, capacity 70,000 kg.	Complied
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 -	Kerdau POM doesn't directly obtain FFB from independent smallholders; instead, the mill acquires FFB externally from independent estates, dealers, or collection centers. Upstream, Outside Crop Purchasers (OCP) are responsible for identifying potential external suppliers. Adhering to Sime Darby Plantation Responsible Sourcing Guidelines (RSG), these potential suppliers undergo assessment to ensure no deforestation occurred after 2010, no planting in peat areas after 2010, possession of a valid land title (as demonstrated by sample suppliers or dealers), and holding a valid MPOB license for oil palm planting, transportation, and the sale of FFB.	Complied
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	A grievance mechanism has been established, as outlined in the Grievance Response Standard Operating Procedure dated 18/07/2022. It's important to note that Kerdau POM does not directly procure FFB from independent smallholders.	Complied
<b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	There was an OCP Engagement Program latest conducted on 11/10/23 to involve the smallholders and collection centre to explain the sustainability and RSG to the smallholders. The program has involved MPOB officers to explain on the certification as well.	Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to	SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) as a group has developed Standard Operating Procedure	Complied

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	<p>enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	<p>for Responsible Sourcing Guidelines (RSG) with Doc. No.: SD/SDP/GS/001 dated June 2020 in approaching third party FFB &amp; CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers. There was a OCP Engagement Program conducted on 11/10/23 to involve the smallholders and collection centre to explain the sustainability and RSG to the smallholders</p>	
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>As part of SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB. Group Sustainability Department, Sustainability Compliance Unit has conducted Desktop Review Assessment for OCP suppliers to check on the compliance of no planting on peat and forest reserve as part of due diligence process. There was an OCP Engagement Program conducted on 11/10/23 to involve the smallholders and collection centre to explain the sustainability and RSG to the smallholders.</p>	Complied
5.2.4	<p><b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>Kerdau POM supports independent smallholders through purchase of their FFB. No binding contract/agreement between them on certification as of now. However, the independent smallholders often received information on certification from Kerdau POM mainly on MSPO during consultation.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>Kerdau POM supports independent smallholders through purchase of their FFB. No binding contract/agreement between them on certification as of now. However, the independent smallholders</p>	Complied

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		often received information on certification from Kerbau POM mainly on MSPO during consultation.	
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<p><b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity union membership, political affiliation, or age.</p> <p>The above documents could be downloaded from <a href="https://www.sdguthrie.com/wp-content/uploads/2021/12/HRC-2020-1.pdf">https://www.sdguthrie.com/wp-content/uploads/2021/12/HRC-2020-1.pdf</a></p> <p>It was found that the above policies are communicated to all level of workforce via series of training or briefing, besides simplified pictorial flowchart and instruction are displayed at appropriate places, at sampled visited operating unit under SOU 11 Kerbau. The interviewees, including managerial level, workers, contractors and their workers, local community have given feedback they understood that the gist of the policies. Based on records of employment and interviews conducted on-site with sampled internal and external stakeholders, it has been confirmed that workers and groups, including local communities, women, and migrant workers, have not been subjected to discrimination.</p>	Complied

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6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	Based on interview with the sampled workers from different gender and nationalities at each visited operating unit under SOU 11 Kerdau, it was confirmed that there was no discrimination reported. The management has treated all employees equally for example in term of providing accommodation, medical treatment, job opportunity, wages rate, etc. There was also no charging of recruitment fees incurred for foreign workers.	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has developed a Promotion for Employees (Doc. No.: SDP/HRUM/2020/SOP01 dated 01/01/2020) and Career Progression for Workers Level (both local and foreign workers), (Doc. No.: SDP/HRUM/2020/SOP01, dated 01/01/2020) to provide a guideline on promotion process to ensure all employees are given fair and equal opportunity based on the set requirements such as work performance and suitability of the position.</p> <p>There is evidence that each visited operating units under SOU 11 Kerdau 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.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	Based on interview with medical assistant and female workers, it was confirmed that there is no requirement for pregnancy testing to be conducted in each visited operating unit under SOU 11 Kerdau. If there are any cases of delaying on menstrual, medical assistant will advise the female workers to conducted test in estate clinics or to nearest government health clinic.	Complied
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	Each operating unit under SOU 11 Kerdau has its own gender committee which objectives are to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. The committees had their regular	Complied

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	- Critical (Major) compliance -	meetings once in every three months in accordance with procedure. Minutes of meeting were made available for verification. So far, there has been no issue raised by the female workers as verified from the feedback forms and minutes of meeting with regards to discrimination, unfair treatment, and opportunity disparity. Based on interview with the Gender Committee representatives at each visited operating units, it was confirmed that there has been no case of sexual harassment or violence reported.			
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	<p>The wage structure in the SOU 11 Kerdau follows the Malayan Agricultural Procedures Association (MAPA) rates which also follow the Minimum Wages Order 2022. Each of the job has their own work scope which also included in the contract agreement of the workers. The salary structure is comprised of the total daily rates (based on performance), overtime, and other benefits.</p> <p>For the harvester, the wage structure is based on the MAPA/NUPW rates of pay for harvesting and other criteria which include the height of the oil palm trees. The workers were paid accordingly.</p> <p>Based on the sampled payslips for workers (as per indicator 6.2.3), which consists of both genders, it was noted that workers were paid equally for the same job scope. They were paid according to the Minimum Wage Order 2022 and MAPA/NUPW collective agreements without any form of discrimination. This was also evident through interview with a group of workers sampled. Sample of workers for each visited operating units listed as per below worker's ID:</p> <p><b>Kerdau POM</b></p> <table><tr><td>156XXX</td><td>165XXX</td></tr></table>	156XXX	165XXX	Complied
156XXX	165XXX				



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		163XXX	106XXX	
		158XXX	162XXX	
		163XXX	183XXX	
		102XXX	18XX0X	
		<b>Mentakab Estate</b>		
		160XXX	117XXX	
		16XX6X	11XXX6	
		208XXX	182XXX	
		090XXX	18XXX7	
		153XXX	18XX0X	
		<b>Kerdau Estate</b>		
		119XXX	180XX7	
		175XXX	117XX8	
		122XXX	181XXX	
		153XXX	168XXX	
		107XXX	110XXX	
		<b>Chenor Estate</b>		

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		102XXX	170XXX	163XXX	
		107XXX	175XXX	17XX8X	
		143XXX	17X6XX	163XXX	
		155XXX	107XXX	1X3XX5	
		169XXX	149XXX	174XXX	
		Sungai Mai Estate			
		109XXX	120XXX	15XXX6	
		021XXX	114XXX	180XXX	
		045XXX	128XXX	18XXX4	
		127XXX	153XXX	021XXX	
		184XXX	150XXX	135XXX	
		Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.  - Critical (Major) compliance -	SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has signed the Collective Agreement (For field/ oil palm harvesters/oil mill and other general employees) with NUPW [MAPA circular No. 12/2019, dated 02/04/2019] and the collective agreement is valid for three (3) years or until superseded by new Collective Agreement or an Award of the Industrial Court. Employment contract was established based on the collective agreement and available in all languages of which the workers are from. Samples of employment contracts were reviewed and found			Complied

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		that the agreements were signed by the employees. Any new foreign workers will be inducted for the terms and conditions of employment contract and briefed on the company's policies, upon arrival to the operating units. The implementation of this practice was evident through interview with the sampled workers.	
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	Based on sampled employment contracts the contracts were signed in dual language which is English and their home country language such as Bahasa Indonesia, Hindi, and Bangladeshi. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract. The extension contract has outlined the terms and condition according to the Collective agreement, Employment Act and Minimum Wage Order 2022.	Complied
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) between National Union of Plantation Workers (NUPW) has established 'MAPA/NUPW Palm Oil Mill Employees' Agreement' that describes the term and condition of workers employment. Sighted the agreement is available in English and valid for three (3) years or until superseded by new Collective Agreement or an Award of the Industrial Court.</p> <p>Each visited operating unit under SOU 11 Kerdu has established a contract agreement and offer letter for foreign and local workers, respectively. The contract agreement is available in Bahasa Malaysia, Indonesia, Bengali, Hindi and Tamil depends on which country they are from. The contract agreement found signed by both parties (management and workers). Document review found, the employment contract has included a terms and condition of employment as example below:</p>	Complied

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	<ul style="list-style-type: none"><li>• Wages</li><li>• Working Hours</li><li>• Sick Leave</li><li>• Annual Leave</li><li>• Maternity Leave (stated in Offer Letter for Local Workers)</li><li>• Termination Service</li></ul> <p>According to the interviewed workers, their working days are from Monday to Saturday, with Sunday is the rest day. Each visited operating unit provides a 3-month maternity leaves to the female workers regardless of the worker’s race, religious and political attraction. While annual and medical leaves are offered based on the worker’s service period. The unused annual leaves are paid during the December salary. The calculation of the paid annual leaves is based on their monthly salary which fluctuate depending on their performance and the rate is calculated as Ordinary Rate Pay as specified in the Employment Act.</p> <p>Samples payslip for workers from various operations such as mill operators, harvester, field workers and general workers were verified. Overtime was found to be appropriate, and deduction was fairly made as per the agreement and approval from the Labour Department. Sample of workers for each operating units listed as per below worker’s ID:</p> <p><b>Kerdau POM</b></p> <table><tr><td>156XXX</td><td>165XXX</td></tr><tr><td>163XXX</td><td>106XXX</td></tr></table>	156XXX	165XXX	163XXX	106XXX	
156XXX	165XXX					
163XXX	106XXX					

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		158XXX	162XXX	
		163XXX	183XXX	
		102XXX	18XX0X	
		<b>Mentakab Estate</b>		
		160XXX	117XXX	
		16XX6X	11XXX6	
		208XXX	182XXX	
		090XXX	18XXX7	
		153XXX	18XX0X	
		<b>Kerdau Estate</b>		
		119XXX	180XX7	
		175XXX	117XX8	
		122XXX	181XXX	
		153XXX	168XXX	
		107XXX	110XXX	
		<b>Chenor Estate</b>		
		102XXX	170XXX	163XXX

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		<table><tr><td>107XXX</td><td>175XXX</td><td>17XX8X</td></tr><tr><td>143XXX</td><td>17X6XX</td><td>163XXX</td></tr><tr><td>155XXX</td><td>107XXX</td><td>1X3XX5</td></tr><tr><td>169XXX</td><td>149XXX</td><td>174XXX</td></tr></table> <p><b>Sungai Mai Estate</b></p> <table><tr><td>109XXX</td><td>120XXX</td><td>15XXX6</td></tr><tr><td>021XXX</td><td>114XXX</td><td>180XXX</td></tr><tr><td>045XXX</td><td>128XXX</td><td>18XXX4</td></tr><tr><td>127XXX</td><td>153XXX</td><td>021XXX</td></tr><tr><td>184XXX</td><td>150XXX</td><td>135XXX</td></tr></table>	107XXX	175XXX	17XX8X	143XXX	17X6XX	163XXX	155XXX	107XXX	1X3XX5	169XXX	149XXX	174XXX	109XXX	120XXX	15XXX6	021XXX	114XXX	180XXX	045XXX	128XXX	18XXX4	127XXX	153XXX	021XXX	184XXX	150XXX	135XXX	
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184XXX	150XXX	135XXX																												
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Workers are accommodated at the housing complex quarters of the operating units without any charges. Free water supply, subsidised electric supply and free medical support were also given to all workers. Housing inspection was conducted weekly by the Medical Assistant using the Housing Complex/ Nest/ Community Hall Weekly Inspection Checklists (PIOA). Sighted the form were categorized into:</p> <ul style="list-style-type: none"><li>• Cleanliness/ domestic waste/ landscaping</li><li>• Drainage system</li><li>• Nursery/ crèche</li><li>• Community hall, sports and other recreational facilities</li></ul>	Complied																											

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		<p>Platform namely, 'OPP (Oil Palm Pal) System' with QR code is developed for workers lodge a report pertaining to the housing defects. Sighted in the OPP system, the workers need to provide Name, House Number and Damage Complaint before submitting the complaint. Later, the complaint report will be summarized into 'Housing Defect Consent Form' (HDCF) that contain the following information:</p> <ul style="list-style-type: none"><li>• Status (completed/ void/ incomplete)</li><li>• Risk category</li><li>• Estimated completion date</li><li>• Date start in progress</li><li>• Date completed</li><li>• Date voided</li><li>• Remarks</li></ul> <p>During site visit to the worker quarters compound, it was observed that the repair of worker quarters drains was in progress. The progress of the drain repairs has also been recorded on the worker quarter map. Records of drain repairs are also maintained by the operating unit, documented through photos and records of payments related to the repairs.</p> <p>Informed by the local workers who living inside the estate or mill that, each visited operating unit do provides a transportation for their children to go to the school. The following were informed by the sample of workers during site interview:</p> <ul style="list-style-type: none"><li>• Workers housing were provided with basic necessities such as water and electricity supply.</li></ul>	
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		<ul style="list-style-type: none"> <li>• QR code ('OPP (Oil Palm Pal) System') is patched at each housing. Sighted during site visit at workers quarters, the QR code is available and in good condition.</li> <li>• Training to use the QR code is provided by the management. During the audit, the workers are able to demonstrate their knowledge on using the QR code.</li> <li>• The management will take immediate action for any issue lodged and for pending issue, the management will communicate during morning master.</li> <li>• Recreational area is available in the estate. Annual sport day is conducted by the management during Labour Day.</li> <li>• Clinic is available in the estate. As for the critical issue, they will be sent to the nearby hospital by using company's vehicle.</li> <li>• Other social facilities are available such as community hall, clinic and football field</li> </ul>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There was no issue on accessibility to adequate and sufficient food supplies as sundry shops were available in most of the housing complex. Workers are also free to go to the nearby towns for more options of groceries. There has been no complaint received with regards to the price of supplies. Based on interview, the basic supplies were affordable.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p>	<p>The certification unit has provided decent living wage for both local and foreign workers based on SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) prevailing wages assessment. Among the items included in the calculation were wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, transport allowance, telecommunication, and welfare, to name a few. Review of sampled pay slips and prevailing</p>	Complied



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<p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> </ul>	<p>wage assessment report showed that the wages received complied with the Minimum Wage Order 2022. The management conducted Prevailing Wage Assessment based on check-roll worker for period 2023 and published in January 2024.</p>	
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	<ul style="list-style-type: none"> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>All core activities such as milling activities, harvesting, chemical spraying and fertilizer application were performed by the permanent employee.</p> <p>Sighted during site visit, each operating unit is using SAP (System Application and Product in Data Processing) system to maintain and update the administration and operation information. By using the SAP, each operating unit has established 'Employee Master List' which includes an information such as:</p> <ul style="list-style-type: none"> <li>• Employee number</li> <li>• Full name</li> <li>• Date of Birth</li> <li>• Nationality</li> <li>• Date of Join</li> <li>• Employment Status</li> <li>• Race</li> </ul> <p>Each visited operating unit has appointed a contractor for hiring JCB, road repairs, FFB transport and domestic waste collection. Through documentation review, estates and mill has established a</p>	Complied

		contract agreement between the contractors and describe the term and condition of the job awarded. Verification on the contract agreement found, the contract agreement is signed by both parties. There are no casual or temporary workers has been recruited by all operating units as verified in the master list of workers.	
<b>Criterion 6.3:</b> The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.3.1	<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 -	Policy to respect the rights of all employees has been embedded in SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) established policy of "Group Sustainability & Quality Policy Statement" which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019. The policy is guided by Human Right Charter (HRC) revised 2020. Section 3.2.4 of HRC stated that the company respecting freedom of association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, we will provide alternative means of employee engagement and grievance redressal.  Employees were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample latest minutes of meeting between Management and NUPW representatives. The policy has been communicated to the workers through musters call as verified during the interview session with sampled workers during the audit.	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	Based on documentation review, each visited operating unit has conducted a meeting between NUPW representatives and management as follows:	Complied

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	national languages (English and/or Bahasa Malaysia) and made available upon request.  - Minor compliance -	Estate/Mill	Latest Union Meeting	
		Sungai Mai Estate	08/03/2024	
		Chenor Estate	08/01/2024	
		Kerdau Estate	07/07/2023	
		Mentakab Estate	15/03/2024	
		Kerdau POM	14/03/2024	
		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. Sampled workers interview also informed that union representatives are freely elected where there is no interference from management, and they are also involved in voting to appoint representatives.		
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.  - Minor compliance -	Interview with the NUPW representatives and the workers confirmed that the election of the representatives were freely done by the workers without any influence or interference from the management.	Complied	
Criterion 6.4: Children are not employed or exploited.				
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.  - Minor compliance -	Policy to protect children and young person has been embedded in SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) established policy of "Group Sustainability & Quality Policy Statement" which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 02/12/2019. The policy is	Complied	

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		<p>guided by Human Right Charter (HRC) revised 2020. Section 3.3.1 of HRC stated the company committed to eradicating child labour in our supply chain and will not employ anyone under the age of 18 years.</p> <p>All the contractors were required to read through Vendor COBC before they signed on the Vendor Integrity Pledge where they will be required to comply with labour and human rights. The contractors had also been briefed on the human right charter and prohibition of child labour. This has confirmed with the stakeholders through stakeholder consultation.</p>	
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>As stated under Section 3.3: Respect and Uphold Children's Right of HRC 2020, SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) will not employ anyone under the age of 18 years. This was also explained in the Responsible Recruitment Procedure 2021 where the minimum requirement of the age is 18 years old. Age screening is based on identification documents and/or passport and from the stated date of birth. The local employees were required to submit a photocopy of identification card during application of job to the management for verification purpose.</p> <p>A computerized check-roll system called 'SEMUA Checkroll System' (also known as SAP system) is in used at estates and mill under SOU 11 Kerdau. It was confirmed via demonstration that the system doesn't allow registration for those below 18 years old, therefore the salary scheme cannot be generated. Checking on SAP system at each visited operating unit have not found any of the workers below 18 years old. From the list of employees which has the date of birth and date of join the estate, it can be confirmed that there are no children working in each operating unit. Further confirmation</p>	Complied

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		was made through site visit at the workplace area and interviews with the workers onsite.	
6.4.3	<b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	From the list of employees which has the date of birth and date of join the estate, it can be confirmed that there are no children nor young workers working in each operating unit, including the contractors' workers. From some list it was noted that the youngest workers are at aged 20. Further confirmation was made through site visit at the workplace area and interviews with the workers onsite. Identity documentation such as passports and identity cards were verified.	Complied
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. - Minor compliance -	The management of each operating unit has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders. This had also been confirmed through interview with the stakeholders and contractors.	Complied
<b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has developed Human Rights Charter (HRC) last revised 2020 where stated the policy and commitment of the company to prevent all forms of sexual harassment and violence at the workplace. Under section 3.2.1 of HRC stated that the company's commitment on eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking, and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. Furthermore, under section 3.2.6 mentioned the company is committed to creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence	Complied

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		<p>is never used to resolve issues or conflict. The policy has been communicated to the workers through musters and display on notice boards.</p> <p>Based on the interview with the workers (male and female), no issues on sexual harassment have been lodged or happened. They were also aware of the channels that they can use to lodge their concern. This has also been reminded during morning muster once in a while. Furthermore, the female workers are aware of the procedure if such incident occurs whereby, they can reports using the Grievance channel such as suara kami and whistleblowing, or direct report to the management.</p>	
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Stated in the Human Right Charter year 2020, commitment of SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) in protecting reproductive right and has been clearly outline in clause 3.2.5. There is evidence that the policy has been implemented where there is no restriction by the management for pregnancy and there are no pregnant/breastfeeding women handling with chemical. It has been further confirmed through interview with the female workers.</p> <p>Communication of the policy sighted based on briefing records for each operating units and further verified based on interview with the stakeholders and workers which can demonstrate their understanding on the policy that has been established.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Assessment for new mothers (with infants under 24 months) FY2024 were conducted by each operating unit. The management has appointed a female employee (either the chair of the Gender Committee or the female Medical Assistant (MA)) to conduct the assessment. The assessment was done through direct interview with the female workers. Based on verification of the assessment</p>	Complied

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		report and interviews, among the needs identified were time allocated during working hours for breastfeeding and regular visits to clinics. The management had granted the identified needs to the new mothers.	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>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 confidential to the fullest possible extent in a manner consistent with the need to conduct an investigation, unless the individual consents to disclosure or if disclosure is otherwise required by law.</p> <p>Each operating unit has established gender committee with objective to improve awareness, identify opportunity and improvement and issue of the workers specifically on women. The committee will act as the mechanism to monitor and investigate if there is any sexual harassment, domestic violence, and abusive children in the operating unit. The frequency of the meeting is once in two months.</p> <p>Apart from that, flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders.</p> <p>In addition, the company has implemented "Suara Kami Helpline" as a platform for the workers to raise any issue. The workers have been informed about the platform through morning muster and</p>	Complied



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		display on notice boards. The procedure is also accessible on the company's website.  Latest communication has been verified via training record and muster briefing record dated January 2024.	
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Based on interviews with the workers, and observations made, the following were verified:</p> <ol style="list-style-type: none"> <li>a. Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Some Indonesian workers has been interviewed and confirmed that passport has been kept by the workers itself. It has been confirmed during site visit to line site where verification passport has been kept at their house.</li> <li>b. Charging of recruitment fee: Workers are not charged any recruitment fees. Interviews conducted with workers also confirmed that they have not been charged any recruitment fees.</li> <li>c. Involuntary overtime: Based on interviews conducted with the workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work. Sighted written consent from workers to work overtime for estates and POM visited.</li> <li>d. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers. There is no term and condition</li> </ol>	Complied

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		<p>for any resignation and the flight tickets will bear by the operating units.</p> <p>e. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no loan/borrowing money has been given by the management to the workers. The is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement.</p> <p>f. Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by account and can be withdraw at the nearest bank and sighted evidence of payment that has been signed by the workers. There is evidence that there no workers' wages have been withheld. It has been further confirmed through interview.</p>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Human Rights Charter 2020 included the commitment to respect and uphold labour rights, under which included the commitment as required in this indicator.</p> <p>SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) has established Migrant Worker Responsible Recruitment Procedure, dated 20/08/2021. This procedure serves as operational guidance on SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad)'s commitments in the Human Rights Charter, 2020. The procedure among others included the appointment and monitoring of the agent's performance, and the benefits and rights of the workers at their home country and upon arrival in Malaysia.</p> <p>There are migrant workers has been recruited from India, Indonesia, and Bangladesh to work in SOU 11 Kerdu. As per</p>	Complied

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		verification, there is evidence that the policy and procedures has been implemented where each process of recruitment has been done such as signing employment contract, interview and consultation with migrant workers at origin countries and One Stop Centre. As per interview, it has been confirmed that all facilities and benefits has been provided equally for all foreign workers. Passport has been kept by the workers itself. There is no evidence of contract substitution where all migrant workers have been explained the content of the employment contract at the origin countries. It has been confirmed through interview with the workers itself.				
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.						
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The mill and estates manager has been appointed as person responsible for safety and health cum chairman for safety and health as per Appointment letter dated 02/01/2023 by Regional Chief Executive Officer Central East Region. All correspondence were sighted and verified. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training. Concerns on issue related health, safety and welfare were discussed at these meetings and recorded. The OSH Committee meeting for Estate was conducted on quarterly basis. Reviewed the latest minutes meeting FY 2024 and FY2023 as follows:</p> <table><tr><td>OSH Meeting 2024</td><td>Kerdau Estate</td><td>Chenor Estate</td></tr></table>	OSH Meeting 2024	Kerdau Estate	Chenor Estate	Complied
OSH Meeting 2024	Kerdau Estate	Chenor Estate				

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		1 <sup>st</sup> Quarter	05/02/2024	08/03/2024	
		2 <sup>nd</sup> Quarter	30/04/2024	TBC	
		OSH Meeting 2023			
		4 <sup>th</sup> Quarter	08/11/2023	15/12/2023	
		3 <sup>rd</sup> Quarter	25/08/2023	15/09/2023	
		OSH Meeting 2024	Sg Mai Estate	Mentakab Estate	
		1 <sup>st</sup> Quarter	05/03/2024	29/03/2024	
		2 <sup>nd</sup> Quarter	TBC	TBC	
		OSH Meeting 2023			
		4 <sup>th</sup> Quarter	22/12/2023	29/12/2023	
		3 <sup>rd</sup> Quarter	29/09/2023	25/09/2023	
		OSH Meeting 2024	Kerdau POM		
		1 <sup>st</sup> Quarter	15/02/2024		
		2 <sup>nd</sup> Quarter	TBC		
		OSH Meeting 2023			
		4 <sup>th</sup> Quarter	17/11/2023		

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		3 <sup>rd</sup> Quarter	18/08/2023													
		Workplace inspections are made prior to the ESH meeting. Latest workplace inspection was conducted on the month of February and April 2024.														
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the 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 -	Refer Emergency Preparedness & Response Procedures dated 17/11/2021 with reference number UM/HSE/SP/02. Procedures were available in the estates and mills to address potential emergencies such as Flood, Fire, Chemical Spillage, Poisoning, Earthquake/landslide, Accidents, Storm, and Wild/ Poisonous Animal Attacks. The plans have been posted at notice boards in the mills and estates and communicated to the workers. Emergency contact numbers have been posted at the notice boards and provided to the workers as well. Interview with the workers such as mandores and store attendants indicated that the workers are aware on the available emergency response plans. Trainings were conducted in the mill and estates to provide awareness to the workers on emergency responses. The trainings were sighted as below. <table><tr><td>Estate/ Mill</td><td>ERP Training date</td></tr><tr><td>Kerdau Estate</td><td>21/03/2024</td></tr><tr><td>Kerdau POM</td><td>26/01/2024</td></tr><tr><td>Chenor Estate</td><td>03/04/2024</td></tr><tr><td>Sg Mai Estate</td><td>12/02/2024</td></tr><tr><td>Mentakab Estate</td><td>23/12/2023</td></tr></table>		Estate/ Mill	ERP Training date	Kerdau Estate	21/03/2024	Kerdau POM	26/01/2024	Chenor Estate	03/04/2024	Sg Mai Estate	12/02/2024	Mentakab Estate	23/12/2023	Complied
Estate/ Mill	ERP Training date															
Kerdau Estate	21/03/2024															
Kerdau POM	26/01/2024															
Chenor Estate	03/04/2024															
Sg Mai Estate	12/02/2024															
Mentakab Estate	23/12/2023															

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		<p>First aiders were present in the operating units. They have been trained and obtained certificates as the PIC to address first aid in the operating units. Visit to the mill and estates indicated each station and gangs were equipped with first aid kits. Interview with the respective first aid holders indicated that they were well aware on the methods to use the items in the first aid boxes. The boxes are regularly monitored by the mill and estate Hospital Assistants to replenish the used items and replace expired items. Records of items used were also maintained and available in the boxes. Latest inspection as follows:</p> <table><tr><th>Estate/ Mill</th><th>First Aid Training date</th><th>Latest First Aid Monitoring Record</th></tr><tr><td>Kerdau Estate</td><td>20/03/2024</td><td>01/05/2024</td></tr><tr><td>Kerdau POM</td><td>15/02/2024</td><td>20/04/2024</td></tr><tr><td>Chenor Estate</td><td>14/02/2024</td><td>24/04/2024</td></tr><tr><td>Sg Mai Estate</td><td>01/03/2024</td><td>26/04/2024</td></tr><tr><td>Mentakab Estate</td><td>26/12/2023</td><td>02/05/2024</td></tr></table> <p><u>Kerdau POM</u></p> <p>Accident records were maintained and updated monthly at the mill. The JKKP 8 form have been submitted for the year ending 2023 on 24/01/2024 with reference number JKKP8/169087/2024. There were 1 accident recorded with 34 days TLA.</p> <p><u>Kerdau Estate</u></p>	Estate/ Mill	First Aid Training date	Latest First Aid Monitoring Record	Kerdau Estate	20/03/2024	01/05/2024	Kerdau POM	15/02/2024	20/04/2024	Chenor Estate	14/02/2024	24/04/2024	Sg Mai Estate	01/03/2024	26/04/2024	Mentakab Estate	26/12/2023	02/05/2024	
Estate/ Mill	First Aid Training date	Latest First Aid Monitoring Record																			
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		<p>Accident records were maintained and updated monthly at the estate. The JKKP 8 form have been submitted for the year ending 2023 on 10/01/2024 with reference number JKKP8/158571/2023. There were 3 accidents recorded with 61 days TLA.</p> <p><u>Chenor Estate</u></p> <p>Accident records were maintained and updated monthly at the estate. The JKKP 8 form have been submitted for the year ending 2023 on 09/01/2024 with reference number JKKP8/158668/2024. There were 7 accidents recorded with 21 days TLA.</p> <p><u>Sg Mai Estate</u></p> <p>Accident records were maintained and updated monthly at the estate. The JKKP 8 form have been submitted for the year ending 2023 on 08/01/2024 with reference number JKKP8/157639/2023. There were 2 accidents recorded with 80 days TLA.</p> <p><u>Mentakab Estate</u></p> <p>Accident records were maintained and updated monthly at the estate. The JKKP 8 form have been submitted for the year ending 2023 on 30/01/2024 with reference number JKKP8/177489/2023. There were 5 accidents recorded with 42 days TLA.</p>					
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>Refer PPE Issuance record for the year 2024. Based on the HIRARC carried out at the estates/mill the PPE types for the various activities has been identified and implemented.</p> <table><tr><th>Category</th><th>PPE provided</th></tr><tr><td>Tractor Driver</td><td>Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.</td></tr></table>	Category	PPE provided	Tractor Driver	Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.	Complied
Category	PPE provided						
Tractor Driver	Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.						

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		<table><tr><td>Sprayers</td><td>Respirator, nitrile glove, goggles, wellington boots, apron.</td></tr><tr><td>Manuring</td><td>Apron, wellington boots, dust mask, nitrile glove.</td></tr><tr><td>Harvester</td><td>Safety helmet, Goggle, sickle cover, hand glove, wellington boots</td></tr></table>	Sprayers	Respirator, nitrile glove, goggles, wellington boots, apron.	Manuring	Apron, wellington boots, dust mask, nitrile glove.	Harvester	Safety helmet, Goggle, sickle cover, hand glove, wellington boots			
Sprayers	Respirator, nitrile glove, goggles, wellington boots, apron.										
Manuring	Apron, wellington boots, dust mask, nitrile glove.										
Harvester	Safety helmet, Goggle, sickle cover, hand glove, wellington boots										
		Similarly, the mill issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded.									
		<table><tr><th>Category</th><th>PPE provided</th></tr><tr><td>Mill operator</td><td>Safety boots, earmuff, safety vest, helmet, cotton glove</td></tr><tr><td>Water treatment Plant Operator</td><td>Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.</td></tr><tr><td>Workshop</td><td>Safety Helmets, Goggles, Leather Gloves, safety Shoes.</td></tr></table>	Category	PPE provided	Mill operator	Safety boots, earmuff, safety vest, helmet, cotton glove	Water treatment Plant Operator	Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.	Workshop	Safety Helmets, Goggles, Leather Gloves, safety Shoes.	
Category	PPE provided										
Mill operator	Safety boots, earmuff, safety vest, helmet, cotton glove										
Water treatment Plant Operator	Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.										
Workshop	Safety Helmets, Goggles, Leather Gloves, safety Shoes.										
		The mill and estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Personal Protective Equipment (PPE) Procedure, UM/HSE/OCP/03 dated 09/03/2021.									



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		<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition.</p>																			
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>All workers are provided with medical care which is borne by the operating units management. Each operating unit has its own dispensary managed by a certified Hospital Assistant. There are no restrictions for workers to obtain medical aid from the dispensary. In case of major injuries or health issues, workers are referred to private clinics or hospitals which is totally borne by the management as well.</p> <p>All workers are protected via insurance in accordance with Malaysian Law via SOCSO contribution. The monthly contribution was evident via the PERKESO Monthly Salary Contribution (Form 8A) for the workers as following.</p> <table border="1"> <thead> <tr> <th>Operating Units</th><th>Month</th><th>Total Workers</th><th>Amount</th></tr> </thead> <tbody> <tr> <td rowspan="2">Kerdau Estate</td><td>Jan 2024</td><td>494</td><td>RMXX,XXX.XX</td></tr> <tr> <td>March 2024</td><td>468</td><td>RMXX,XXX.XX</td></tr> <tr> <td rowspan="2">Kerdau POM</td><td>Jan 2024</td><td>116</td><td>RMX,XXX.XX</td></tr> <tr> <td>March 2024</td><td>113</td><td>RMX,XXX.XX</td></tr> </tbody> </table>	Operating Units	Month	Total Workers	Amount	Kerdau Estate	Jan 2024	494	RMXX,XXX.XX	March 2024	468	RMXX,XXX.XX	Kerdau POM	Jan 2024	116	RMX,XXX.XX	March 2024	113	RMX,XXX.XX	Complied
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		<table><tr><td rowspan="2">Chenor Estate</td><td>Jan 2024</td><td>189</td><td>RMX,XXX.XX</td></tr><tr><td>March 2024</td><td>185</td><td>RMX,XXX.XX</td></tr><tr><td rowspan="2">Sg Mai Estate</td><td>Jan 2024</td><td>242</td><td>RMX,XXX.XX</td></tr><tr><td>March 2024</td><td>234</td><td>RMX,XXX.XX</td></tr><tr><td rowspan="2">Mentakab Estate</td><td>Jan 2024</td><td>311</td><td>RMXX,XXX.XX</td></tr><tr><td>March 2024</td><td>304</td><td>RMXX,XXX.XX</td></tr></table>	Chenor Estate	Jan 2024	189	RMX,XXX.XX	March 2024	185	RMX,XXX.XX	Sg Mai Estate	Jan 2024	242	RMX,XXX.XX	March 2024	234	RMX,XXX.XX	Mentakab Estate	Jan 2024	311	RMXX,XXX.XX	March 2024	304	RMXX,XXX.XX												
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6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Occupational Injuries were recorded as below:</p> <table><tr><th rowspan="2">Operating Unit</th><th colspan="2">2023</th><th rowspan="2">Hours worked</th><th rowspan="2">Average Workers</th></tr><tr><th>Cases</th><th>TLA</th></tr><tr><td>Kerdau Estate</td><td>3</td><td>61</td><td>1,277,603</td><td>525</td></tr><tr><td>Kerdau POM</td><td>1</td><td>34</td><td>268,640</td><td>92</td></tr><tr><td>Chenor Estate</td><td>7</td><td>21</td><td>482,400</td><td>201</td></tr><tr><td>Sg Mai Estate</td><td>2</td><td>80</td><td>449,214</td><td>187</td></tr><tr><td>Mentakab Estate</td><td>5</td><td>42</td><td>483,840</td><td>210</td></tr></table>	Operating Unit	2023		Hours worked	Average Workers	Cases	TLA	Kerdau Estate	3	61	1,277,603	525	Kerdau POM	1	34	268,640	92	Chenor Estate	7	21	482,400	201	Sg Mai Estate	2	80	449,214	187	Mentakab Estate	5	42	483,840	210	Complied
Operating Unit	2023			Hours worked	Average Workers																														
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Principle 7: Protect, conserve and enhance ecosystems and the environment																																			

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Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																			
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>Integrated Pest Management Plan has been established for the year of 2023. The plan was monitored by person in charge with target date and completion status. Among the plan as below:</p> <table><tr><th>Issue / Area</th><th>Action Plan</th></tr><tr><td>Bagworm attack</td><td>To increase plan beneficial plan ratio per Ha 1dm:1Ha to 2dm:1ha</td></tr><tr><td>Rat attack</td><td>To increase ratio BOB from 1:13 and gradually to 1:10 ratio</td></tr><tr><td>Soil Moisture</td><td>To plan <i>Nephrolepis</i> to emergence of weed and also to increase moisture</td></tr><tr><td>Chipping of trunk</td><td>To chipping trunk below 10 cm in order to avoid breeding of rhino beetle</td></tr><tr><td>LCC</td><td>To prevent breeding of RB</td></tr><tr><td>Single layer of EFB Mulching</td><td>To prevent breeding of RB</td></tr><tr><td>Application of Benjoni as mulching for immature palm</td><td>To reduce area of chemical To reduce high leaching of fertilizer</td></tr></table> <p>Monitoring has been conducted by estates. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. Barn owls <i>Tyto Alba</i> has been used</p>	Issue / Area	Action Plan	Bagworm attack	To increase plan beneficial plan ratio per Ha 1dm:1Ha to 2dm:1ha	Rat attack	To increase ratio BOB from 1:13 and gradually to 1:10 ratio	Soil Moisture	To plan <i>Nephrolepis</i> to emergence of weed and also to increase moisture	Chipping of trunk	To chipping trunk below 10 cm in order to avoid breeding of rhino beetle	LCC	To prevent breeding of RB	Single layer of EFB Mulching	To prevent breeding of RB	Application of Benjoni as mulching for immature palm	To reduce area of chemical To reduce high leaching of fertilizer	Complied
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		for biological control of rats. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. The estates have planted beneficial plants such as <i>Cassia Cobanensis</i> and <i>Turnera Subulata</i> and <i>Antigonon leptopus</i> .	
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 -	Species referenced in the Global Invasive Species Database and CABI.org are not used in the estate.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There was no evidence of use of fire for pest control in all the estate.	Complied
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad). Refer to Sime Darby Plantation Agricultural Reference Manual, Issue No:2 dated June 2021. The manual already classified the type of weed, herbicide to used, rate/dosage and dilution rate as a guidance based on the field conditions. Addition or reduction of rounds and dosage will be considered in consultation with the respective head of units or agronomist.	Complied

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7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Sighted the sampled records of pesticides usage (A.I.) per ha at estates visited FY 2023 (to date) as follows:</p> <p><u>Kerdau Estate</u></p> <table><tr><th>Month</th><th>Quantity (a.i./Ha)</th><th>Quantity (a.i/FFB)</th></tr><tr><td>Jan 2024</td><td>0.110</td><td>0.071</td></tr><tr><td>Feb 2024</td><td>0.173</td><td>0.162</td></tr><tr><td>Mar 2024</td><td>0.352</td><td>0.185</td></tr><tr><td>Apr 2024</td><td>0.325</td><td>0.265</td></tr></table> <p><u>Chenor Estate</u></p> <table><tr><th>Month</th><th>Quantity (a.i./Ha)</th><th>Quantity (a.i/FFB)</th></tr><tr><td>Jan 2024</td><td>0.068</td><td>0.059</td></tr><tr><td>Feb 2024</td><td>0.182</td><td>0.143</td></tr><tr><td>Mar 2024</td><td>0.070</td><td>0.053</td></tr><tr><td>Apr 2024</td><td>0.034</td><td>0.023</td></tr></table> <p><u>Sg Mai Estate</u></p> <table><tr><th>Month</th><th>Quantity (a.i./Ha)</th><th>Quantity (a.i/FFB)</th></tr></table>	Month	Quantity (a.i./Ha)	Quantity (a.i/FFB)	Jan 2024	0.110	0.071	Feb 2024	0.173	0.162	Mar 2024	0.352	0.185	Apr 2024	0.325	0.265	Month	Quantity (a.i./Ha)	Quantity (a.i/FFB)	Jan 2024	0.068	0.059	Feb 2024	0.182	0.143	Mar 2024	0.070	0.053	Apr 2024	0.034	0.023	Month	Quantity (a.i./Ha)	Quantity (a.i/FFB)	Complied
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7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5. The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In replace, alternatives such as Glyphosate is used instead.</p>	Complied																											

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7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	There is no prophylactic use of pesticides in all estates visited.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.  The due diligence refers to: a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance -	The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations.  The register showed that only class III & IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.	Complied
7.2.6	<b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out. - Critical (Major) compliance -	The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant. Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms. Reviewed the training	Complied

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		records as per criteria 3.7.2. Sampled the training conducted for pesticide handlers as below: <u>Kerdau Estate</u> <table><tr><th>Training</th><th>Date</th></tr><tr><td>Inter Pump Spraying Training</td><td>13/03/2024</td></tr><tr><td>Safe Chemical Training</td><td>04/10/2024</td></tr></table> <u>Kerdau POM</u> <table><tr><th>Training</th><th>Date</th></tr><tr><td>Chemical Handling Training</td><td>02/01/2024</td></tr></table> <u>Sg Mai Estate</u> <table><tr><th>Training</th><th>Date</th></tr><tr><td>Chemical Handling Training</td><td>11/01/2024</td></tr></table> <u>Mentakab Estate</u> <table><tr><th>Training</th><th>Date</th></tr><tr><td>Chemical Handling Training</td><td>05/01/2024</td></tr><tr><td>Inter pump 16 training</td><td>16/01/2024</td></tr></table> <u>Chenor Estate</u> <table><tr><th>Training</th><th>Date</th></tr></table>	Training	Date	Inter Pump Spraying Training	13/03/2024	Safe Chemical Training	04/10/2024	Training	Date	Chemical Handling Training	02/01/2024	Training	Date	Chemical Handling Training	11/01/2024	Training	Date	Chemical Handling Training	05/01/2024	Inter pump 16 training	16/01/2024	Training	Date	
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		<table><tr><td>Rat Baiting Training</td><td>06/03/2024</td></tr><tr><td>Manuring Training</td><td>25/01/2024</td></tr><tr><td>Chemical Handling Training</td><td>20/03/2024</td></tr><tr><td>Inter pump / Spraying training</td><td>29/01/2024</td></tr></table> <p>Interview conducted with sample pesticide handler found their awareness were in order.</p>	Rat Baiting Training	06/03/2024	Manuring Training	25/01/2024	Chemical Handling Training	20/03/2024	Inter pump / Spraying training	29/01/2024	
Rat Baiting Training	06/03/2024										
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Inter pump / Spraying training	29/01/2024										
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the storekeeper was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.</p>	Complied								
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>The procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established. Empty containers disposed through licenced contractors as SW409.</p>	Complied								
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p>	<p>Verification through interview with estate management and site visit confirmed that Aerial spraying of pesticide was not practiced in the SOU 11 Supply bases.</p>	Complied								

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	- Critical (Major) compliance -		
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. Medical Surveillance were conducted in the mill and estates based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <p><u>Kerdau POM</u></p> <p>Medical Surveillance Programme has been performed successfully for the year 2024 on 22/03/2024 for 26 workers, found that all of them are fit.</p> <p><u>Kerdau Estate</u></p> <p>Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification. The management has conducted the medical surveillance dated 06/03/2024, for 67 workers. All workers are declared fit to work by OHD.</p> <p><u>Chenor Estate</u></p> <p>Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification. The management has conducted the medical surveillance dated 20/03/2024, for 16 workers and 30/04/2024 for 4 workers. All workers are declared fit to work by OHD.</p> <p><u>Sg Mai Estate</u></p> <p>Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification.</p>	Complied

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		<p>The management has conducted the medical surveillance dated 01/02/2024, for 6 workers. All workers are declared fit to work by OHD.</p> <p><u>Mentakab Estate</u></p> <p>Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification. The management has conducted the medical surveillance dated 05/04/2024, for 36 workers. All workers are declared fit to work by OHD.</p>	
7.2.11	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>All estates have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on 05/05/2022. It was sighted during the visit to the stores there were signage stating that pregnant and breast-feeding women are not allowed to enter the chemical stores.</p> <p>As per verification with master list of workers, medical surveillance report, interview with management and site visit, it was confirmed that there is no under age of 18, pregnant or breastfeeding women and other people that have medical restrictions was assigned for chemical related works in the two estates visited. If there is any workers having medical restrictions as per examination during medical surveillance, they will be offered alternative equivalent work in the estates.</p>	Complied
<b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	SOU11 Kerdau POM and Estates had identified all wastes and sources of pollution. The Waste Management Action Plan FY 2024 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors	Non-compliance

- Minor compliance -	for the estate and mill operations were:		
		Receptor	Sources
	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG
	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down
	3	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.
	All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2024. The waste generated from the mill/estate operations as shown below;		
		Type of waste	Details
	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries
	2	Domestic waste	rubbish from the mill complex and employees' quarters
	3	Industrial waste	Fibre, palm kernel shell, boiler ash, scrap iron

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		<table><tr><td>4</td><td>Sewage</td><td>Sewage from housing/office complex</td></tr></table> <p>The pollution identified from the mill activities</p> <table><tr><td></td><td>Type of waste</td><td>Details</td></tr><tr><td>1</td><td>Black smoke and particulate</td><td>Emission from Boilers</td></tr><tr><td>2</td><td>Odour &amp; gases</td><td>Activities from the effluent treatment</td></tr><tr><td>3</td><td>Leakage of lubricant</td><td>Storage &amp; vehicle maintenance</td></tr></table> <p>Waste management plan to include recycling and disposal of waste from additional processes were not comprehensively documented and implemented.</p> <p><u>Sg Mai Estate</u></p> <p>Sighted minor spills of oil onto soil resulting from open tractor/vehicle parking area. Based on Waste Management Plan FY 2024, waste generated from oil contaminated soil has not been identified together with the approach on waste disposal.</p> <p><u>Mentakab Estate</u></p> <p>Sighted spot of oil contaminated soil at estate’s scarp yard. waste generated from soil contaminated with oil has not been identified in the Waste Management Plan FY 2024 together with the approach on waste disposal.</p> <p>Thus, a minor NC was raised.</p>	4	Sewage	Sewage from housing/office complex		Type of waste	Details	1	Black smoke and particulate	Emission from Boilers	2	Odour & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance	
4	Sewage	Sewage from housing/office complex																
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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>The SOP on Scheduled Waste disposal is established and implemented according to the below documented procedures:</p> <p>a) Details as provided in SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) MQMS Standard Operating Procedure Section VII- Handling of scheduled waste (Hazardous Waste) Management ref no. SD/SDP/PSQM (ESH) /203-EN1 dated 26/2/2015.</p> <p>b) SD Guthrie Berhad, Waste Management Procedure For Upstream Malaysia,</p> <p>doc ID:SD/SDP/GSD/HSE/05022/01 dated version:1 effective May 2022.</p> <p><u>Kerdau POM</u></p> <p>Waste disposal records checked:</p> <table><tr><th>Waste type</th><th>Consignment note ref./information</th></tr><tr><td>SW 306</td><td>CN no. 2024041611Z9HOSR, quantity: 0.076 mt dated 16/04/2024 Waste collector: Kxxxxx Axxx Sdn Bhd</td></tr><tr><td>SW 409</td><td>CN no. 20240417106RAU5Y, quantity: 0.38 mt dated 16/04/24 Waste collector: Kxxxxx Axxx Sdn Bhd</td></tr><tr><td>SW 305</td><td>CN no. 202404170UGWHRP, quantity: 0.08 mt dated 16/04/24 Waste collector: Kxxxxx Axxx Sdn Bhd</td></tr></table>	Waste type	Consignment note ref./information	SW 306	CN no. 2024041611Z9HOSR, quantity: 0.076 mt dated 16/04/2024 Waste collector: Kxxxxx Axxx Sdn Bhd	SW 409	CN no. 20240417106RAU5Y, quantity: 0.38 mt dated 16/04/24 Waste collector: Kxxxxx Axxx Sdn Bhd	SW 305	CN no. 202404170UGWHRP, quantity: 0.08 mt dated 16/04/24 Waste collector: Kxxxxx Axxx Sdn Bhd	Complied
Waste type	Consignment note ref./information										
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SW 409	CN no. 20240417106RAU5Y, quantity: 0.38 mt dated 16/04/24 Waste collector: Kxxxxx Axxx Sdn Bhd										
SW 305	CN no. 202404170UGWHRP, quantity: 0.08 mt dated 16/04/24 Waste collector: Kxxxxx Axxx Sdn Bhd										

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		SW 102	CN no. 202404160PUM2R8, quantity: 0.05 mt dated 16/04/24  Waste collector: Kxxxxx Axxx Sdn Bhd		
		The inventory of the waste generated is recorded using the “E-SWISS” inventory system. All SW are disposed to licensed/approved SW collector and Kubota Malaysia Sdn Bhd for the workshop lubricant and others waste. The estates scheduled wastes are disposed to Tractor/Kubota Malaysia collection upon completion of machine/vehicles servicing and maintenance.			
		Latest disposal records verified:			
		Waste type	Consignment ref./information note		Estate
		SW 404	CN no. 2024030108DZOTB6, quantity: 0.076 mt dated 1/03/2024  Waste collector: Kxxxxx Axxx Sdn Bhd		Chenor Estate
SW 305	CN no. 2024013111H2RAIM, quantity: 0.8561 mt dated 31/1/24  Waste collector: Cxxxxxx Rxxxxxxx & Rxxxxxx Sdn Bhd				
SW 306	CN no. 20240131117O9WF6, quantity: 0.6633 mt dated 31/1/24				

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			Waste collector: Cxxxxxx Rxxxxxxx & Rxxxxxx Sdn Bhd	Mentakab Estate
		SW 410	CN no. 2024013017IDVBS5, quantity: 0.055 mt dated 30/01/2024  Waste collector: Kxxxxx Axxx Sdn Bhd	
		SW 410	CN no. 20240118166GISLC, quantity: 0.02 mt dated 18/01/2024  Waste collector: Kxxxxx Axxx Sdn Bhd	
		SW 409	CN no. 2024011816AQ2DOZ, quantity: 0.035 mt dated 18/01/2024  Waste collector: Kxxxxx Axxx Sdn Bhd	
		SW 110	CN no. 2024011811ULH7Z3, quantity: 0.02 mt dated 18/01/2024  Waste collector: Kxxxxx Axxx Sdn Bhd	
Letter form DOE Putrajaya dated 13/04/2022 on the approval for Kubota Malaysia Sdn Bhd for collection and disposal management of scheduled waste from machine/vehicle servicing and maintenance was sighted and verified. Collection made for SW 305 and SW 410. For example at Chenor Estate, latest collection of				



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		waste done by KXXXXX MXXXXXXX Sdn Bhd on 19/4/2024 based on Bring Back Scheduled Waste Form (serial no. 2053) for SW 305 and SW 410	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	<p>There was no land preparation in SOU 11 Kerdu POM and Estates by burning ever since SD Guthrie Berhad practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> <li>a) EQMS-SOP-Section B2 - Under felling/clearing &amp; land preparation</li> <li>b) Group Sustainability and Quality Policy Statement dated Dec 2019, supported by SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) Responsible Agriculture Charter</li> </ul> <p>SD Guthrie 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.</p>	Complied
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	<p>SOP on managing soil fertility for optimize yield and minimize environmental impacts has been established. The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents.</p> <ul style="list-style-type: none"> <li>• EQMS chapter B8 - Leguminous Cover Crops</li> <li>• EQMS chapter B14 – Manuring</li> <li>• ARM Section 8 – Manuring</li> </ul>	Complied

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7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Periodic tissue and soil sampling is carried out by Plant Nutrition &amp; Protection Unit (PNP), Plantation Research and Advisory, Central East Region to monitor and manage changes in soil fertility and plant health. As per SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad)'s agriculture reference manual, leaf sampling frequency is once per year and soil sampling (once every 5 years). Summary of analysis for SOU11 estates:</p> <table><tr><th>Estate</th><th>Leaf sampling (1 year interval)</th><th>Soil sampling (5 years interval)</th></tr><tr><td>Chenor Estate</td><td>Test report ref. P443/2023 dated 14/11/2023 for 48 oil palm leaf sample(s)</td><td>Test report ref. S29/2019, dated 13/02/2019. - 12 soil sample(s) from 3 different depth (0-15 cm, 15-30 cm and 30-45 cm)</td></tr><tr><td>Mentakab Estate</td><td>2024/2025 Agronomic and fertilizer recommendation report – Oil Palm dated 25/03/2024.</td><td>Test report ref. S61/2023, dated 26/10/2023. - 24 soil sample(s) from 3 different depth (0-15 cm, 15-30 cm and 30-45 cm)</td></tr><tr><td>Sg Mai Estate</td><td>2024/2025 Agronomic and fertilizer recommendation</td><td>Test report ref. S20/2023, dated 09/03/2023.</td></tr></table>	Estate	Leaf sampling (1 year interval)	Soil sampling (5 years interval)	Chenor Estate	Test report ref. P443/2023 dated 14/11/2023 for 48 oil palm leaf sample(s)	Test report ref. S29/2019, dated 13/02/2019. - 12 soil sample(s) from 3 different depth (0-15 cm, 15-30 cm and 30-45 cm)	Mentakab Estate	2024/2025 Agronomic and fertilizer recommendation report – Oil Palm dated 25/03/2024.	Test report ref. S61/2023, dated 26/10/2023. - 24 soil sample(s) from 3 different depth (0-15 cm, 15-30 cm and 30-45 cm)	Sg Mai Estate	2024/2025 Agronomic and fertilizer recommendation	Test report ref. S20/2023, dated 09/03/2023.	Complied
Estate	Leaf sampling (1 year interval)	Soil sampling (5 years interval)													
Chenor Estate	Test report ref. P443/2023 dated 14/11/2023 for 48 oil palm leaf sample(s)	Test report ref. S29/2019, dated 13/02/2019. - 12 soil sample(s) from 3 different depth (0-15 cm, 15-30 cm and 30-45 cm)													
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Sg Mai Estate	2024/2025 Agronomic and fertilizer recommendation	Test report ref. S20/2023, dated 09/03/2023.													

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			report – Oil Palm dated 22/12/2023.	- 18 soil sample(s) from 3 different depth (0-15 cm, 15-30 cm and 30-45 cm)	
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 -	There was no EFB application at Chenor Estate. Alternatively, Benjoni will be used as mulching for immature palm.			Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Fertilizer application is based on 2023/2024 Fertilizer Programme (Oil Palm) for each respective estates.			Complied
		Fertilizer type	Application rate (kg/palm)	Total applied	
		COMP65	2 kg per palm (field 2022C)	306 bags x 50 kg per bag (15.3 mt), date of application: January 2024 (immature)	
		NKC1	3.25 kg per palm (field 02J)	533 bags x 50 kg per bag (26.67 mt, date of application: January – February 2024 (mature)	
		NKC1	2.75 kg per palm (field P99A1)	524 bags x 50 kg per bag (26.21 mt, date of application: February 2024 (mature)	

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<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.			
7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Soil series map were available for all estates prepared by the R&D-Precision Agriculture Unit. No fragile soils identified in all estates in SOU 11.	Complied
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	Addressed in the SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.1 Protect and conserve biodiversity and ecosystems stated as follows: "3.1.2 - Management of erosion by protection of steep slopes and river reserves within our operations and promote restoration programs."	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting of oil palm on steep terrain at all visited estates	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.			
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil series and topography map available for estate visited. No fragile soil categorized in the estates visited as per soil map issued by R&D Precision Agriculture Unit. As sighted in estates visited, the estate has taken into account the land terrain, drainage, and road systems in planning the 2023 replanting.	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 -	Addressed in the SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) 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:	Complied

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		<p>"We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <p>vii. No new development of peat areas, regardless of depth or location. We will seek to rehabilitate existing plantings on peats where possible.</p> <p>Verification was made during this round of audit from document verification, site visit and interview confirmed that there is no planting on marginal and fragile soils</p>	
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Slope map prepared by R&amp;D-TTAS Precision Agriculture Unit (UCP) and topography information at all visited estates visited were verified. No steep terrain for all estates (&gt; 25°) and most of the area with rolling and undulating terrain.</p>	Complied
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p><b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting on peat at all visited estates. Verified through soil series map and site visit, there is no peat soil identified within SOU 11 estates. Hence, this indicator is not applicable.</p>	Not Applicable
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>There is no new planting on peat at all visited estates. Verified through soil series map and site visit, there is no peat soil identified within SOU 11 estates. Hence, this indicator is not applicable.</p>	Not Applicable

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7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	There is no new planting on peat at all visited estates. Verified through soil series map and site visit, there is no peat soil identified within SOU 11 estates. Hence, this indicator is not applicable.	Not Applicable
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	There is no new planting on peat at all visited estates. Verified through soil series map and site visit, there is no peat soil identified within SOU 11 estates. Hence, this indicator is not applicable.	Not Applicable
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	There is no new planting on peat at all visited estates. Verified through soil series map and site visit, there is no peat soil identified within SOU 11 estates. Hence, this indicator is not applicable.	Not Applicable
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	There is no new planting on peat at all visited estates. Verified through soil series map and site visit, there is no peat soil identified within SOU 11 estates. Hence, this indicator is not applicable.	Not Applicable

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7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	There is no new planting on peat at all visited estates. Verified through soil series map and site visit, there is no peat soil identified within SOU 11 estates. Hence, this indicator is not applicable.	Not Applicable														
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.																	
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>SOU11 Kerdu Certification Unit has established its Water Management Plan for year 2024 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <p>a) Implementation of rainwater harvest,</p> <p>b) Construction of water gate for effective management of field drains,</p> <p>c) Establishment of <i>Mucuna bracteata</i> to prevent erosion,</p> <p>d) Side drain at field road to control water, frond stacking,</p> <p>e) Enhancement of ground vegetation at bare ground area.</p> <p>The water sources are as shown below;</p> <table><tr><td></td><td>Water sources</td><td>Usage</td><td>Monitoring &amp; measurement</td><td>Freq</td><td>PI C</td><td>Review status</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>		Water sources	Usage	Monitoring & measurement	Freq	PI C	Review status								Complied
	Water sources	Usage	Monitoring & measurement	Freq	PI C	Review status											

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		1	PAIP	Purchased for domestic consumption	Monitoring water supply	Mthly	AMM gr	Awaiting approval from authority	
		2	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	On-going	AMM gr	Water harvesting for general washing	
		3	Water tank	Emergency water supply	-	-	AMM gr	Request water supply from other estates	
		The contingency plan during water shortage							
			Area/incident	Action steps		PIC	status		
	1	Water shortage/ prolonged dry season	to obtain water from local authority /estate catchment to train/educate staff/workers to conserve water to seek assistance from local authority		Manager AM/Mill Engineer	As and when required			



			to obtain treated water supply from mill's WTP			
		2	Severe water pollution/ Contamination	to obtain water from local authority  to train/educate staff/workers to conserve water  to seek assistance from local authority  to obtain treated water supply from mill's WTP	Manager AM// Mill Engineer	As and when required
		3	Salt water intrusion	Flushing out water during dry & low tide season  Construction of screw gate to prevent entry into field drain  Regular inspection during high tide to identify any tide gate and flap door.	Estate Mgmt	Schedule
		The Estate had implemented water managements plans which covered: a) Water shortage contingencies b) Water pollution prevention c) Reduce wastage d) Identification & management of waste waters				

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		<p>e) Monitoring rainfall</p> <p>f) Regular water quality analysis.</p> <p>The water reduction plan is shown below;</p> <table><tr><th></th><th>Issues/Areas</th><th>Action Steps</th><th>PIC</th><th>Status</th></tr><tr><td>1</td><td>Rainwater collection</td><td>Large containers are to be placed at strategic locations to collect rainwater  The rainwater shall be recycled for washing heavy machinery</td><td>AM/Field staff</td><td>On-going</td></tr><tr><td>2</td><td>Leakage on plumbing system</td><td>Frequent inspection to detect leakage  Fix any leakage</td><td>AM/Field staff</td><td>On-going</td></tr><tr><td>3</td><td>Water compartment alization</td><td>To conserve level of soil moisture  To minimize water stress during dry season</td><td>AM/Field staff</td><td>On-going</td></tr><tr><td>4</td><td>Handling of chemicals</td><td>To recycle water spillage while mixing of chemical at mixing area</td><td>AM/Field staff</td><td>On-going</td></tr><tr><td>5</td><td>education</td><td>Avoid excessive usage during cleaning Close pipe to prevent water dripping</td><td>AM/Field staff</td><td>On-going</td></tr><tr><td>5</td><td>Re-streaming</td><td>Re stream from sterilizer condensate pit for dilution</td><td>Mill engineer</td><td>On-going</td></tr></table>		Issues/Areas	Action Steps	PIC	Status	1	Rainwater collection	Large containers are to be placed at strategic locations to collect rainwater  The rainwater shall be recycled for washing heavy machinery	AM/Field staff	On-going	2	Leakage on plumbing system	Frequent inspection to detect leakage  Fix any leakage	AM/Field staff	On-going	3	Water compartment alization	To conserve level of soil moisture  To minimize water stress during dry season	AM/Field staff	On-going	4	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going	5	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going	5	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going	
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		<table><tr><th colspan="5">The Mill Identification &amp; Management of Waste Water</th></tr><tr><th></th><th>location</th><th>Wastewater produced</th><th>Treatment/containment</th><th>Reuse/recycle/disposal method</th></tr><tr><td>1</td><td>Processing stations</td><td>Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water</td><td>Oil recovery/ETP</td><td>Recover into system</td></tr><tr><td>2</td><td>Boiler</td><td>Blow down, cleaning water</td><td>Sludge pit, ETP</td><td>Monsoon drain</td></tr><tr><td></td><td>Process ramp</td><td>Rainfall runoff</td><td>Sedimentation trap</td><td>Monsoon drain</td></tr><tr><td>3</td><td>Engine room</td><td>Steam condensate, turbine cooling water</td><td>Monsoon drain, recycled tank</td><td>Monsoon drain</td></tr><tr><td>4</td><td>Lab</td><td>Cleaning water</td><td>Process drain</td><td>Monsoon drain</td></tr><tr><td>5</td><td>Wash room</td><td>Toilet water, cleaning water</td><td>Septic tank</td><td>Collected by licensed contractor.</td></tr></table>	The Mill Identification & Management of Waste Water						location	Wastewater produced	Treatment/containment	Reuse/recycle/disposal method	1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system	2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain		Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	3	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain	4	Lab	Cleaning water	Process drain	Monsoon drain	5	Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.	
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7.8.2	(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas	SOU11 estate continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) policy to maintain the buffer by restricting agrochemicals application and	Complied																																								

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	<p>provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) dated April 2014). The buffer zones established are as follows:</p> <table><tr><td></td><td><i>River width</i></td><td><i>Buffer zone</i></td></tr><tr><td>1</td><td>&gt; 40 meters</td><td>50 meters</td></tr><tr><td>2</td><td>20 - 40 meters</td><td>40 meters</td></tr><tr><td>3</td><td>10 - 20 meters</td><td>20 meters</td></tr><tr><td>4</td><td>5 - 10 meters</td><td>10 meters</td></tr><tr><td>5</td><td>&lt; 5 meters</td><td>5 meters</td></tr></table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSD Unit with latest revision dated on 13/6/2011.</p> <p>Water analysis report for surface water/river carried out every quarter as per SOP, Water Quality Monitoring, issue:1 dated 1//6/2016. Result of analysis summarized as per below:</p> <table><tr><td>Estate</td><td>Date of monitoring</td><td>Remarks</td></tr><tr><td>Sg Mai Estate</td><td>20/02/2024</td><td>IE362/2024</td></tr><tr><td>Kerdau Estate</td><td>09/02/3034</td><td>IE350/2024</td></tr></table> <p>A few parameters recorded were not complied with class IIA/IIB of NWQS and also pesticides residue in water analysis. Internal CAR</p>		<i>River width</i>	<i>Buffer zone</i>	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	Estate	Date of monitoring	Remarks	Sg Mai Estate	20/02/2024	IE362/2024	Kerdau Estate	09/02/3034	IE350/2024	
	<i>River width</i>	<i>Buffer zone</i>																												
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		<p>was issued, and proper investigation of root cause and corrective action have been implemented.</p> <p>Among others management plan taken;</p> <p>a) Regular inspection at buffer/HCV areas</p> <p>b) Monitor water from surrounding areas</p> <p>c) Track, measure and report all activities around river</p> <p>Train and educate workers.</p>																																																	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Based on “<i>Jadual Pematuhan</i>” (license no 005105 valid until 30/06/2024), method of discharge for Kerdau POM is waterway and composting. Sighted quarterly report has been submitted to DOE by quarterly basis. Summary of 1<sup>st</sup> quarter of 2024 summarized as per below:</p> <table><tr><td></td><td>Parameter</td><td>2<sup>nd</sup> schedule limit</td><td>EP160/2202 4, dated 19/3/2024</td><td>EP108/2024 , dated 23/02/2024</td><td>EP49/2024, dated 23/01/2024</td></tr><tr><td>1</td><td>pH</td><td>5-9</td><td>8.92</td><td>7.99</td><td>8.23</td></tr><tr><td>2</td><td>BOD mg/l</td><td>100</td><td>6</td><td>26</td><td>26</td></tr><tr><td>3</td><td>Total Solids</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>4</td><td>S Solids</td><td>400</td><td>240</td><td>380</td><td>230</td></tr><tr><td>5</td><td>Oil &amp; Grease</td><td>50</td><td>8</td><td>2</td><td>5</td></tr><tr><td>6</td><td>AN</td><td>150</td><td>8</td><td>2</td><td>&lt;1</td></tr><tr><td>7</td><td>TN</td><td>200</td><td>33</td><td>79</td><td>70</td></tr></table>		Parameter	2 <sup>nd</sup> schedule limit	EP160/2202 4, dated 19/3/2024	EP108/2024 , dated 23/02/2024	EP49/2024, dated 23/01/2024	1	pH	5-9	8.92	7.99	8.23	2	BOD mg/l	100	6	26	26	3	Total Solids	-	-	-	-	4	S Solids	400	240	380	230	5	Oil & Grease	50	8	2	5	6	AN	150	8	2	<1	7	TN	200	33	79	70	Complied
	Parameter	2 <sup>nd</sup> schedule limit	EP160/2202 4, dated 19/3/2024	EP108/2024 , dated 23/02/2024	EP49/2024, dated 23/01/2024																																														
1	pH	5-9	8.92	7.99	8.23																																														
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		All parameters tested complied with 2 <sup>nd</sup> Schedule, Environment Quality, Prescribed Premise (CPO) 1977.																	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording detailed sampled (water usage m <sup>3</sup> /per mt of fresh fruit bunches (FFB). For 2023, 1.26 mt water per tonne FFB recorded by end of December 2023. To date April 2024, 1.131 mt of water per tonne FFB showing the proportionate increase in volume of FFB being processed for the first 4 months of 2024. There were variations of performance which may linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.	Complied																
<b>Criterion 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised																			
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	<p>The monitoring is recorded in environment performance indicator-electricity generated by steam turbine tabulated for 2023 and to date 2024. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt CPO. A monthly record on energy consumption for both renewable and non-renewable sources were also maintained and documented. It is monitored to optimize use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel as per below:</p> <table border="1"> <thead> <tr> <th></th><th>Energy Monitoring</th><th>2023</th><th>2024 (to date)</th></tr> </thead> <tbody> <tr> <td>1</td><td>Diesel usage</td><td>62,017</td><td>33,840</td></tr> <tr> <td>2</td><td>CPO production</td><td>40,924.275</td><td>11,584.57</td></tr> <tr> <td>4</td><td>diesel / mt CPO</td><td>1.52</td><td>2.92</td></tr> </tbody> </table>		Energy Monitoring	2023	2024 (to date)	1	Diesel usage	62,017	33,840	2	CPO production	40,924.275	11,584.57	4	diesel / mt CPO	1.52	2.92	Complied
	Energy Monitoring	2023	2024 (to date)																
1	Diesel usage	62,017	33,840																
2	CPO production	40,924.275	11,584.57																
4	diesel / mt CPO	1.52	2.92																

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		<p>The electricity energy monitoring based on CPO produced tabulated as shown below;</p> <table border="1"> <thead> <tr> <th></th><th>Energy Monitoring</th><th>2023</th><th>2024 (to date)</th></tr> </thead> <tbody> <tr> <td>1</td><td>kWh (turbine)</td><td>4,330,334.7</td><td>1,182,515</td></tr> <tr> <td>2</td><td>CPO production</td><td>40,924.275</td><td>11,584.57</td></tr> <tr> <td>4</td><td>kWh / mt CPO</td><td>105.81</td><td>102.08</td></tr> </tbody> </table> <p>Variation of ratio in the analysis were explained and justified. Under the energy management plan 2024 the mill aimed for reduction plan for fossil fuel usage;</p> <ul style="list-style-type: none"> <li>- Educate workers on fuel saving practices.</li> <li>- Preventive maintenance programme</li> </ul>		Energy Monitoring	2023	2024 (to date)	1	kWh (turbine)	4,330,334.7	1,182,515	2	CPO production	40,924.275	11,584.57	4	kWh / mt CPO	105.81	102.08	
	Energy Monitoring	2023	2024 (to date)																
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2	CPO production	40,924.275	11,584.57																
4	kWh / mt CPO	105.81	102.08																
<b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.																			
7.10.1	<b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	<p>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4. Detail of GHG calculation can be found under appendix B.</p>	Complied																
7.10.2	<b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from	Not applicable since no new development by the certification unit.	Complied																

	<p>the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>														
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estate and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table><tr><td></td><td>Environmental receptors</td><td>Source</td></tr><tr><td>1</td><td>Air</td><td>Air emissions –from boiler stack (smoke &amp; particulate), vehicle &amp; generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td></tr><tr><td>2</td><td>Water</td><td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) &amp; boiler quenching water and blow down</td></tr><tr><td>3</td><td>land</td><td>Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.</td></tr></table>		Environmental receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.	Complied
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		The latest stack sampling was carried out on 19/6/2023, ref: L-GB-CC2301CSJ-0374, with 80.2 mg/m <sup>3</sup> at 12% CO <sub>2</sub> vs limit of 150 mg/m <sup>3</sup> . For 2024, the next monitoring will be carried out before end of license period. Notification ref. 4300669426 dated 21/04/2024 was sighted to monitor 2 type of parameter; CO limit 1000 mg/m <sup>3</sup> and Dust/Particulate Matter count limit 150 mg/m <sup>3</sup> . Result of monitoring to be further verified in the assessment.	
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Guided by SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) ARM, preparation of replanting using fire is not allowed. Based on site visit at replanting fields of the sampled estates, there was no trace of burning observed. Palm trunks were chipped and windrowed.	Complied
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 -	<p>There was no land preparation by burning ever since SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad)) practice zero burning as per the policy in:</p> <ul style="list-style-type: none"> <li>a) EQMS-SOP-Section B2 - Under felling/clearing &amp; land preparation</li> <li>b) Group Sustainability and Quality Policy Statement dated Dec 2019, supported by SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) Responsible Agriculture Charter</li> </ul> <p>The use of fire for waste disposal and for preparing land for oil palm cultivation or replanting was not practiced in the estate. The Group policy of "Zero open burning" has been enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any replanting. Furthermore, SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) assigned 1</p>	Complied

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		<p>person based in HQ being in charge to detect any open fire in the Company's' fields using the Global Spot Watch. This is the measures taken by the organization to pledge towards zero open burning.</p> <p><u>Process flow for fire incident reporting</u></p> <p>Incident occurrence &gt; SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) hotspot alert team identification &gt; to notify OU &gt; incident details investigated by OU &gt; immediate site verification by OU &gt; OU to report verification status using Fire Hotspot Internal Report (FHIR) &gt; information with geo-tagged photo &gt; reply to hotspot alert team.</p>									
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Estates and mill under SOU11 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure and Fire Prevention and Control Measure. Therein containing;</p> <p>a) Objective</p> <p>b) Activity and prevention</p> <p>c) Function of Fire and Rescue Team</p> <p>d) Emergency Evacuation Plan / Drill</p> <p>Latest communication in Stakeholder Meeting as below:</p> <table><tr><th>Estate/Mill</th><th>Date of Stakeholder Meeting</th></tr><tr><td>Kedau Estate and Kerdau POM</td><td>05/03/2024 (Kerdau POM combined meeting with Kerdau Estate)</td></tr><tr><td>Chenor Estate</td><td>14/02/2024</td></tr><tr><td>Sungai Mai Estate</td><td>06/03/2024</td></tr></table>	Estate/Mill	Date of Stakeholder Meeting	Kedau Estate and Kerdau POM	05/03/2024 (Kerdau POM combined meeting with Kerdau Estate)	Chenor Estate	14/02/2024	Sungai Mai Estate	06/03/2024	Complied
Estate/Mill	Date of Stakeholder Meeting										
Kedau Estate and Kerdau POM	05/03/2024 (Kerdau POM combined meeting with Kerdau Estate)										
Chenor Estate	14/02/2024										
Sungai Mai Estate	06/03/2024										

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		Mentakab Estate e)	11/01/2024	
<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.				
7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>There is no land clearing after November 2005 within SOU11 estates. Group Sustainability Department (previously known as PSQM) has conducted HCV reassessment for Pahang Zone, SOU 10 – Bukit Puteri, SOU 11 – Kerdu and SOU12 – Jabor on March 2016. Specific HCV area for SOU11 estates have been identified and documented in the said report together with the addendum report dated July 2020 for the latest updated hectareage for SOU11. Hence, the requirement under this indicator does not apply.</p>		Not Applicable
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>a) The audit findings have confirmed that there is no new land clearing after 15 Nov 2018 in SOU 11 estates. Hence, the current HCV assessment of the estates remained valid.</p> <p>b) The audit team have confirmed that there is no new planting after 15 Nov 2018 in SOU11 estates.</p>		Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	<b>N/A</b>		Not Applicable

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7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU11 estates. Hence, the requirement under this indicator does not apply.	Not Applicable
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU11 estates. Hence, the requirement under this indicator does not apply.	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The HCV re-assessment was carried out GSD formerly known as PSQM Department on March 2016. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ul style="list-style-type: none"> <li>a) Overview of HCV assessment</li> <li>b) Description of assessment area <ul style="list-style-type: none"> <li>- Landscape context</li> <li>- biodiversity &amp; conservation values</li> <li>- ecosystem service / social &amp; cultural values</li> </ul> </li> </ul>	Complied

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		<div><div>c) HCV criteria &amp; application to agriculture<ul style="list-style-type: none"><li>- Visual observation &amp; supporting information</li><li>- Wildlife in plantation</li><li>- decision on HCV status</li></ul></div><div>d) HCV management / Monitoring.</div><div>Addendum report dated July 2020 carried out by internal team from Group Sustainability Department – Conservation and Biodiversity Unit. An onsite assessment was carried out on 12/02/2020 as to rectify river reserve/buffer zone hectarage of Sungai Mai and update total HCV hectarage for SOU11.</div><div>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the estates within SOU11 are as per below;</div><table><tr><th>Estates</th><th>Assessed areas</th><th>Area (Ha)</th><th>HCV classification</th><th>Remarks</th></tr><tr><td rowspan="3">Kerdau Estate</td><td>Water Catchment Area</td><td>7.37</td><td>HCV 4</td><td>Provide basic service (water resources) for critical situations</td></tr><tr><td>Pond</td><td>1.05</td><td>HCV 4</td><td>Provide basic service (water resources) for critical situations</td></tr><tr><td>Bukit Kiab</td><td>59</td><td>HCV 4</td><td>Promote soil conservation and prevent erosion</td></tr></table></div>	Estates	Assessed areas	Area (Ha)	HCV classification	Remarks	Kerdau Estate	Water Catchment Area	7.37	HCV 4	Provide basic service (water resources) for critical situations	Pond	1.05	HCV 4	Provide basic service (water resources) for critical situations	Bukit Kiab	59	HCV 4	Promote soil conservation and prevent erosion	
Estates	Assessed areas	Area (Ha)	HCV classification	Remarks																	
Kerdau Estate	Water Catchment Area	7.37	HCV 4	Provide basic service (water resources) for critical situations																	
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	Bukit Kiab	59	HCV 4	Promote soil conservation and prevent erosion																	

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			Jah Hut Cemetery	0.0002	HCV 6	A burial ground for Jah Hut people		
		Chenor Estate	Water Catchment	7.82	HCV 4	Provide basic service (water resources) for critical situations		
		Sg Mai Estate	Water Catchment	1.95	HCV 4	Provide basic service (water resources) for critical situations		
			River Reserve (Sg Mai)	35.38	HCV 4	Promote soil conservation and prevent erosion		
			Jah Hut Cemetery	0.01	HCV 6	A burial ground for Jah Hut people		
		Mentakab Estate	River reserve (Sg Chermang Kanan)	0.5	HCV 4	Promote soil conservation and prevent erosion		
			River reserve (Sg Chermang Kiri)	1.2	HCV 4	Promote soil conservation and prevent erosion		
			River reserve (Sg Semantan)	30	HCV 4	Promote soil conservation and prevent erosion		
		Total of HCV area for SOU11		144.2802 ha (reduced from 157.6402 ha)				
		A programme to regularly educate the workforce about the status of RTE species is in place and carried out on annual basis. For						

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		<p>example the latest training was carried out in Kerdau Estate on 16/4/2024 and Chenor Estate 28/3/2024</p> <p>All areas were sighted and verified. HCV of all above are re-categorized areas from the normal buffer zone category. Hectare for the re-categorized areas has not affected the others category including the planted areas. All the HCVs were maintained by site specific operating units. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, catchment and were documented. Map verification and site visit confirmed that the estate are surrounded by river/straits and villages. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The CU management has established a standard monitoring document. Details provided include the following information:</p> <ul style="list-style-type: none"> <li>a) Area</li> <li>b) Field no and GPS coordinate</li> <li>c) Observation <ul style="list-style-type: none"> <li>- Encroachment /sign of trespassing</li> <li>- Wildlife issues/conflicts/sighting</li> <li>- Pollution /erosion issues</li> </ul> </li> <li>d) Maintenance of signage / fence</li> </ul> <p>The monitoring being made by the AP during the security rounds in the estate complex. The field staff/Assistant also played a role in</p>	Complied

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		providing information during their daily rounds in the fields. Records furnished by the APs were sighted and verified.																										
		<table><tr><td></td><td>Action steps</td><td>Action Plan</td><td>Date</td><td>PIC</td></tr><tr><td>1</td><td>Inspection of HCV</td><td>Continuous inspection and recommendation  To liase with related agency</td><td>On-going</td><td>EM</td></tr><tr><td>2</td><td>Protection or conservation &amp; monitoring of biodiversity area.</td><td>To continuously collaborate with R&amp; D to monitor the status &amp; health of trees</td><td>On-going</td><td>EM</td></tr><tr><td>3</td><td>Interface with animals</td><td>Raise awareness of HCV/RTE to employees  Employees are taught not to disturbed/hunt wildlife.  Liaison with <i>Jabatan Perhilitan</i> on wildlife encounter/discovery</td><td>On-going</td><td>EM</td></tr><tr><td>4</td><td>Education and awareness</td><td>Educate employees on importance of biodiversity.  Encourage research on specific biodiversity  To erect signage  No fishing/no hunting/no swimming</td><td>On-going</td><td>EM</td></tr></table>		Action steps	Action Plan	Date	PIC	1	Inspection of HCV	Continuous inspection and recommendation  To liase with related agency	On-going	EM	2	Protection or conservation & monitoring of biodiversity area.	To continuously collaborate with R& D to monitor the status & health of trees	On-going	EM	3	Interface with animals	Raise awareness of HCV/RTE to employees  Employees are taught not to disturbed/hunt wildlife.  Liaison with <i>Jabatan Perhilitan</i> on wildlife encounter/discovery	On-going	EM	4	Education and awareness	Educate employees on importance of biodiversity.  Encourage research on specific biodiversity  To erect signage  No fishing/no hunting/no swimming	On-going	EM	
	Action steps	Action Plan	Date	PIC																								
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		<table><tr><td>5</td><td>Water bodies</td><td>Education and awareness for workers  Monitoring of water sampling  No agrochemical application Cover any bare soil with planting of vetivar grasses, groundcover to reduce soil erosion</td><td>On-going</td><td>EM</td></tr></table> *EM – Estate management <table><tr><td>Estate</td><td>Monitoring records</td><td>Remarks</td></tr><tr><td>Kerdau Estate</td><td>30/1/24, 21/2/24, 15/03/24, 19/04/24</td><td>No encroachment/ human and wildlife conflict/erosion and pollution recorded</td></tr><tr><td>Chenor Estate</td><td>30/1/2024, 10/2/2024, 5/3/2024, 2/4/2024</td><td>No encroachment/ human and wildlife conflict/erosion and pollution recorded</td></tr><tr><td>Sg Mai Estate</td><td>15/01/2024, 29/02/2024, 21/03/24, 29/04/24</td><td>No encroachment/ human and wildlife conflict/erosion and pollution recorded</td></tr></table>	5	Water bodies	Education and awareness for workers  Monitoring of water sampling  No agrochemical application Cover any bare soil with planting of vetivar grasses, groundcover to reduce soil erosion	On-going	EM	Estate	Monitoring records	Remarks	Kerdau Estate	30/1/24, 21/2/24, 15/03/24, 19/04/24	No encroachment/ human and wildlife conflict/erosion and pollution recorded	Chenor Estate	30/1/2024, 10/2/2024, 5/3/2024, 2/4/2024	No encroachment/ human and wildlife conflict/erosion and pollution recorded	Sg Mai Estate	15/01/2024, 29/02/2024, 21/03/24, 29/04/24	No encroachment/ human and wildlife conflict/erosion and pollution recorded	
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Sg Mai Estate	15/01/2024, 29/02/2024, 21/03/24, 29/04/24	No encroachment/ human and wildlife conflict/erosion and pollution recorded																		
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.	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 11 estate. Hence, the requirement under this indicator does not apply	Complied																	

	- Critical (Major) compliance -		
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### Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **Kerdau POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2023** for **Kerdau POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct	Extraction	%
CPO	1.52	OER	19.45
PKO	0	KER	4.53

Production	t/yr	Land Use	Ha
FFB Process	210,806.29	OP Planted Area	18,272.66
CPO Produced	41,001.31	OP Planted on peat	0
PKO Produced	9,544.5	Conservation (forested)	59.00
		Conservation (non-forested)	109.78
		<b>Total</b>	<b>18,441.44</b>

### Summary of Field Emission and Sink

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	117,837.04	0.65	1369.15	0.75	0	0	119,206.19	1.4
CO <sub>2</sub> Emission from fertilizer	13,727.93	0.08	132.46	0.07	0	0	13,860.39	0.15
NO <sub>2</sub> Emission	6,946.20	0.04	64.36	0.04	0	0	7,010.56	0.08
Fuel Consumption	113.25	0	0.66	0	0	0	113.91	0
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-107,598.67	-0.59	-1,113.24	-0.61	0	0	-108,711.91	-1.2
Conservation Sequestration	0	0	0	0	0	0	0	0
<b>Total</b>	31,025.75	0.17	453.39	0.25	5,357.93	0	36,837.07	-1.2

*\*Note: Includes both estates and smallholders*

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#### Summary of Mill Emission and Credit

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	41,321.60	0.20
Fuel Consumption	10.73	0
Grid Electricity Utilization	0	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>41,332.33</b>	<b>0.20</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

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

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

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

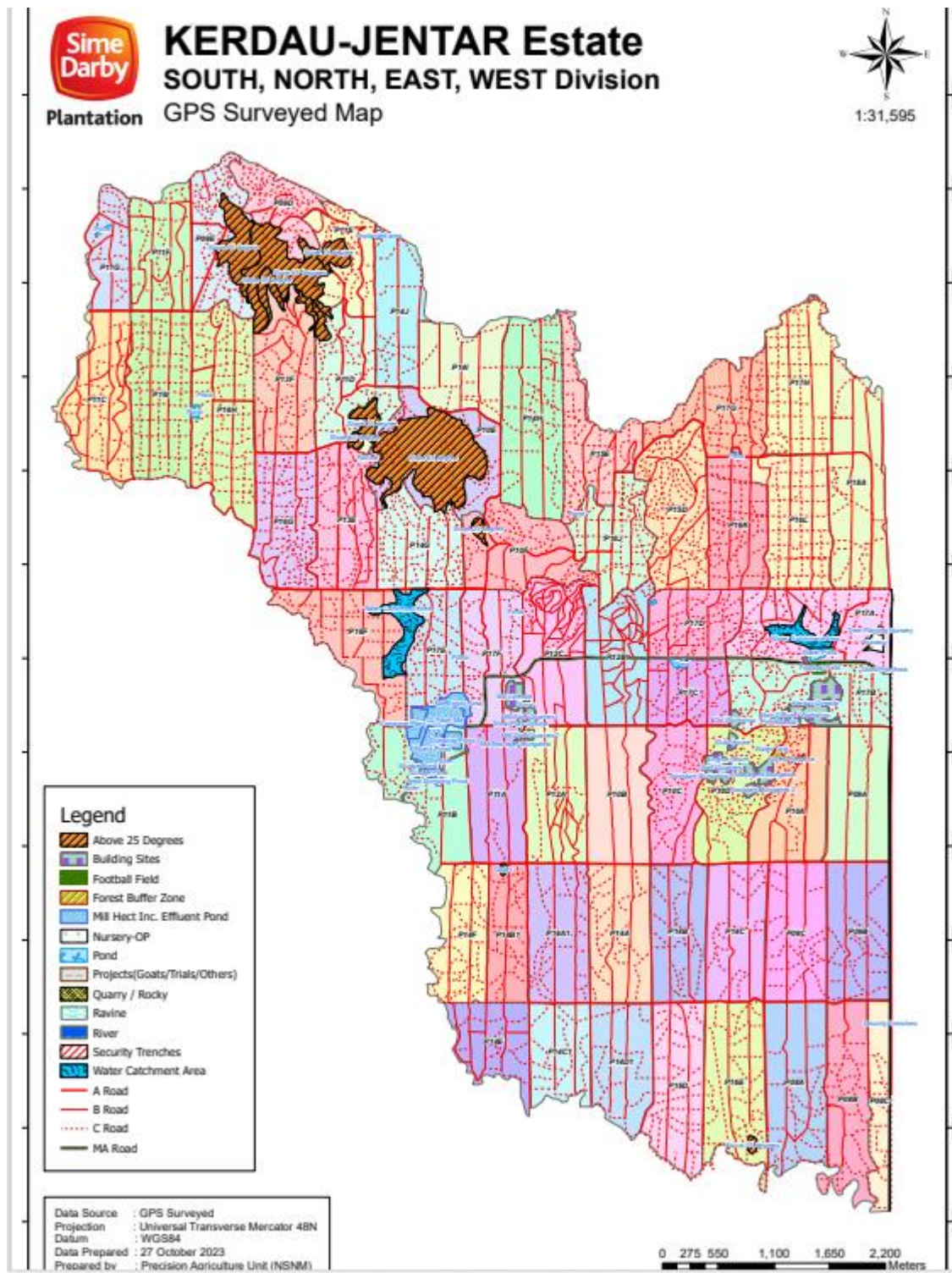


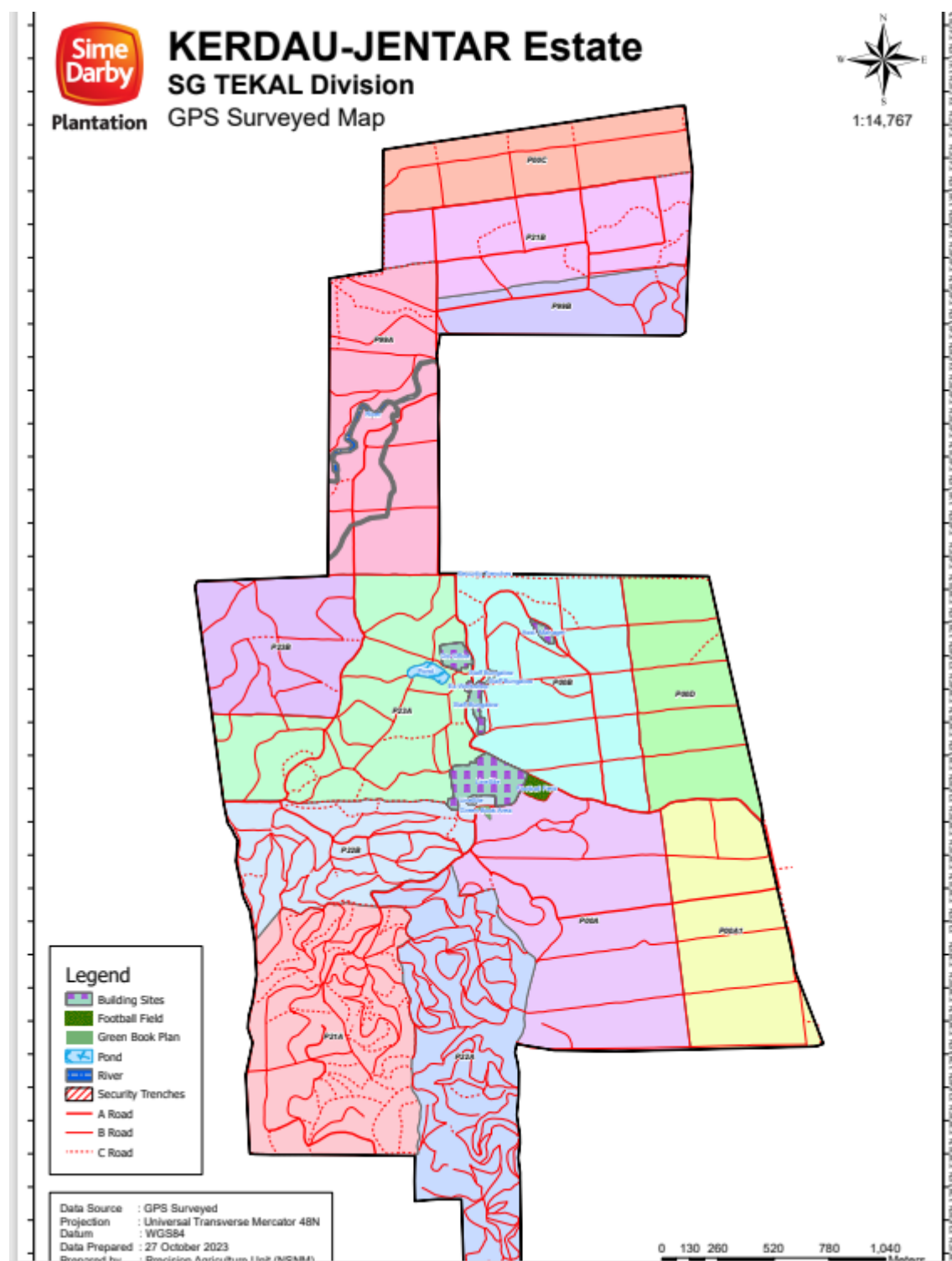


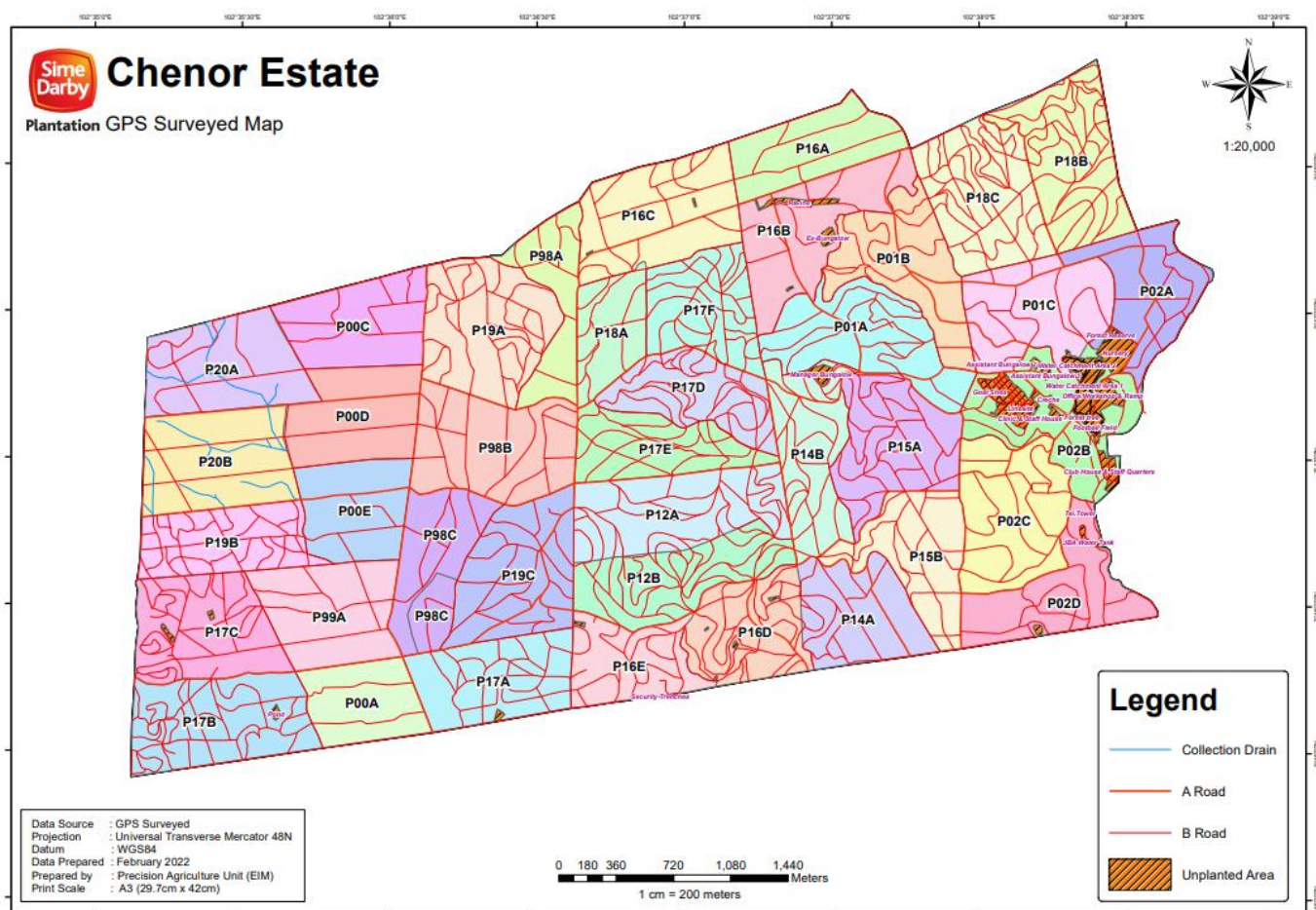
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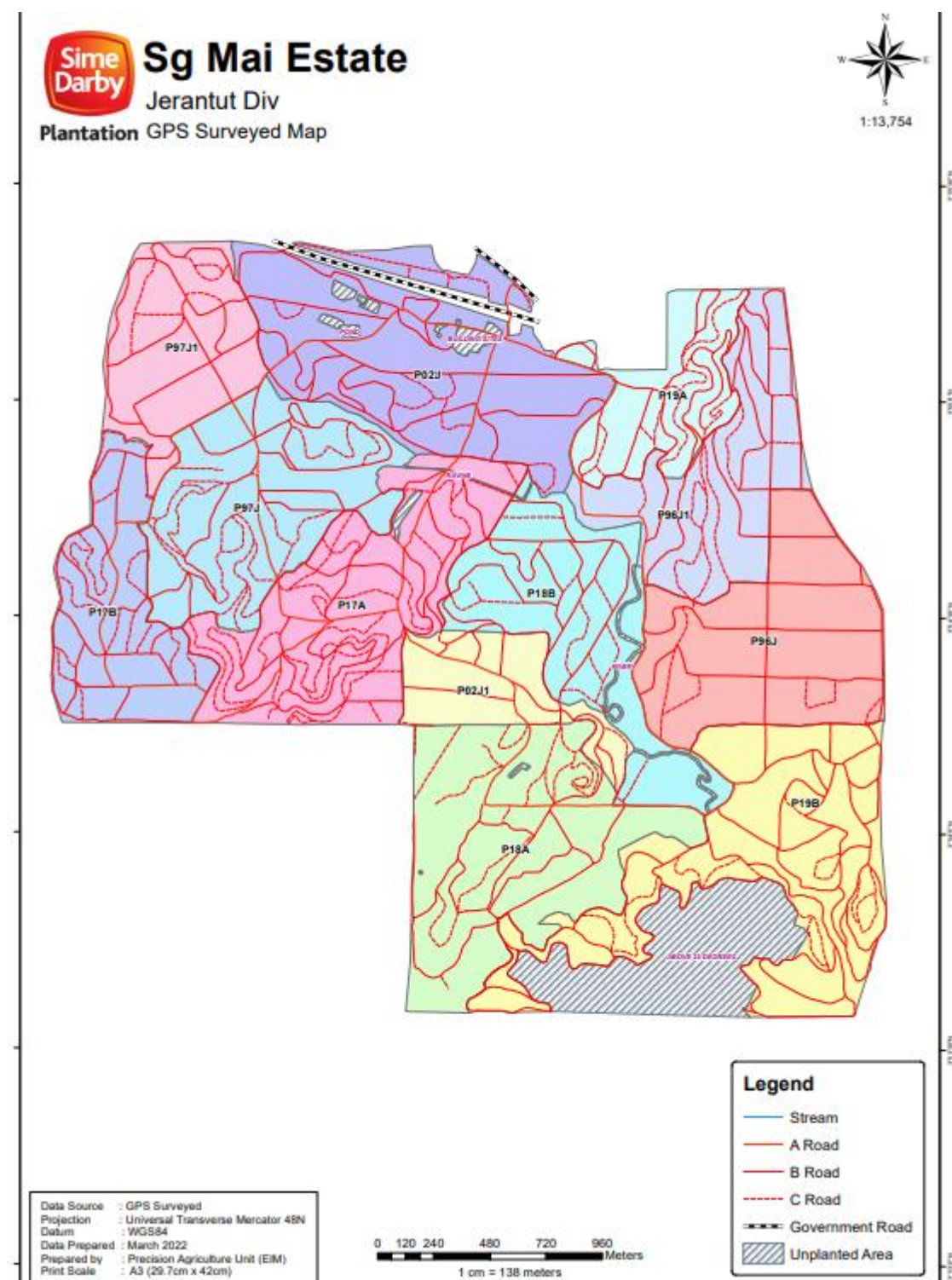
### Appendix D: Estate Field Map

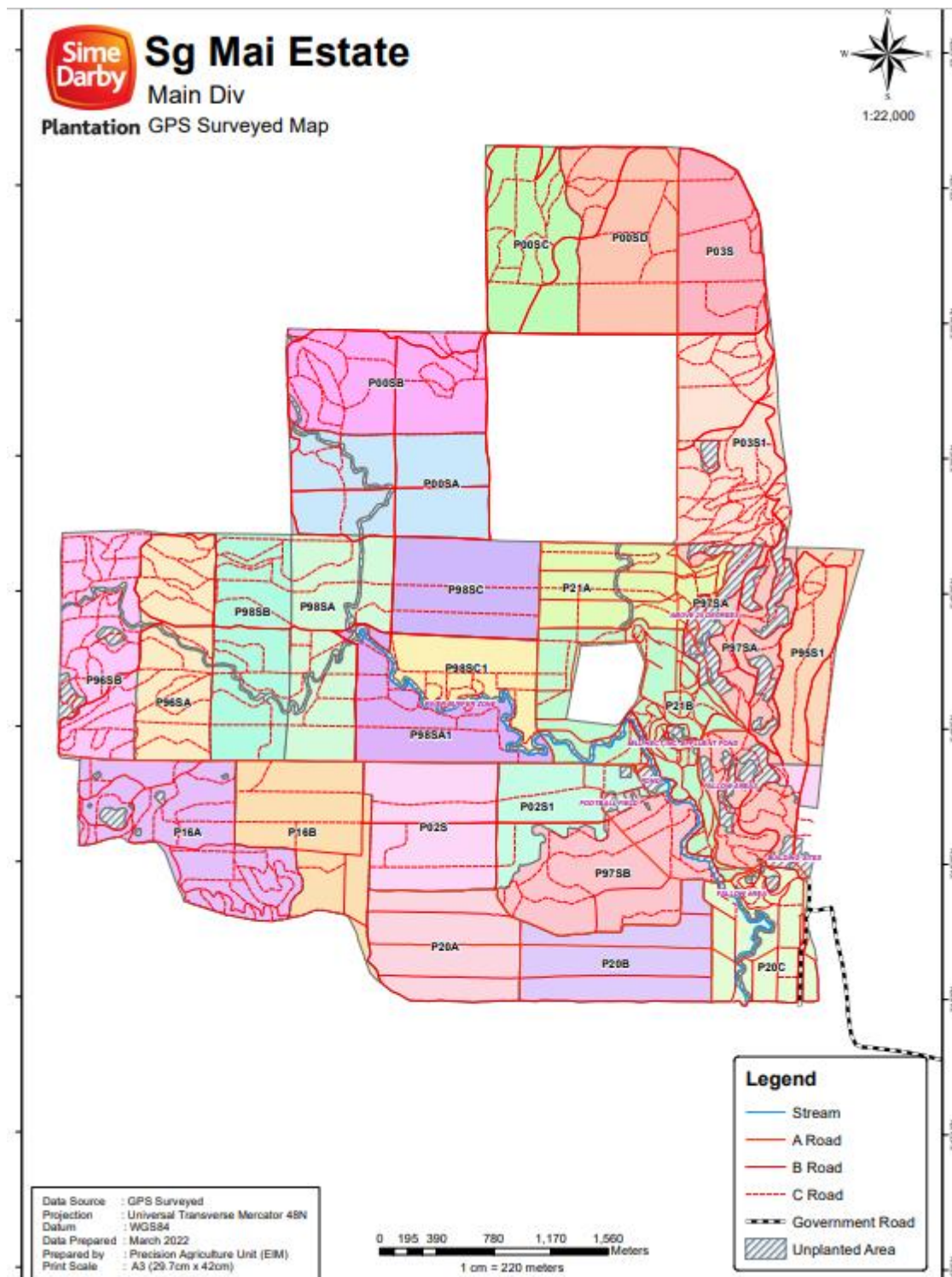






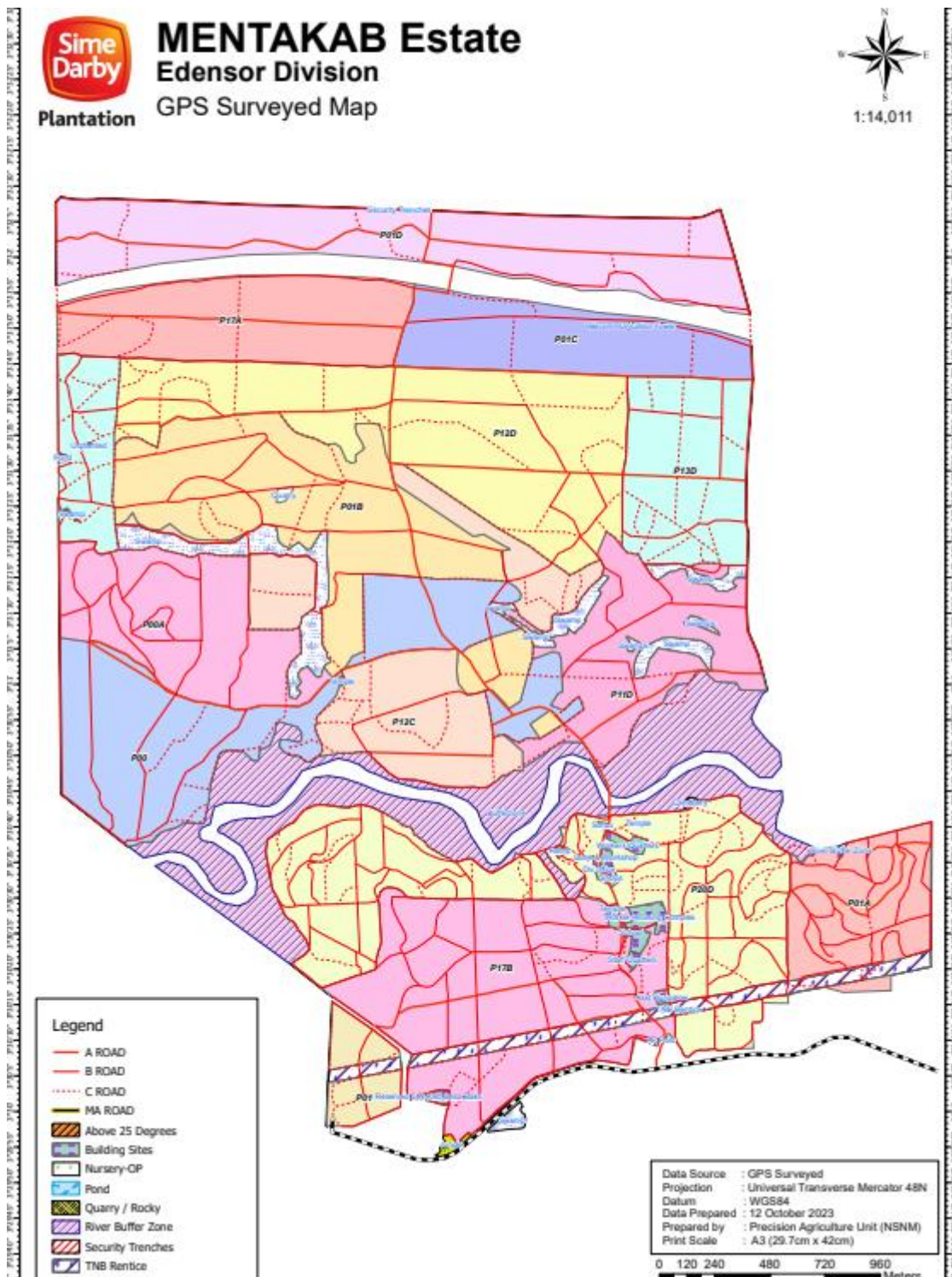


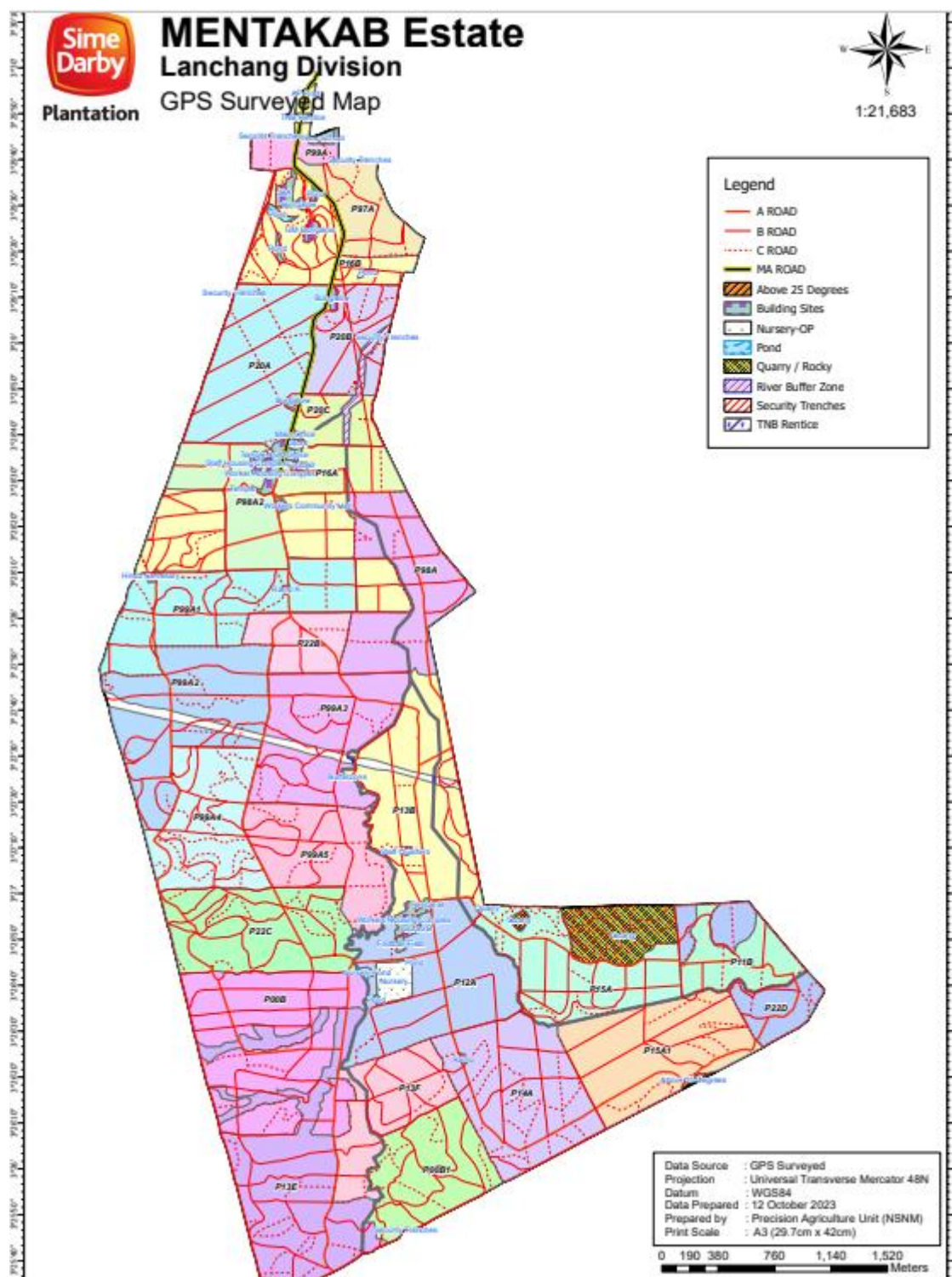


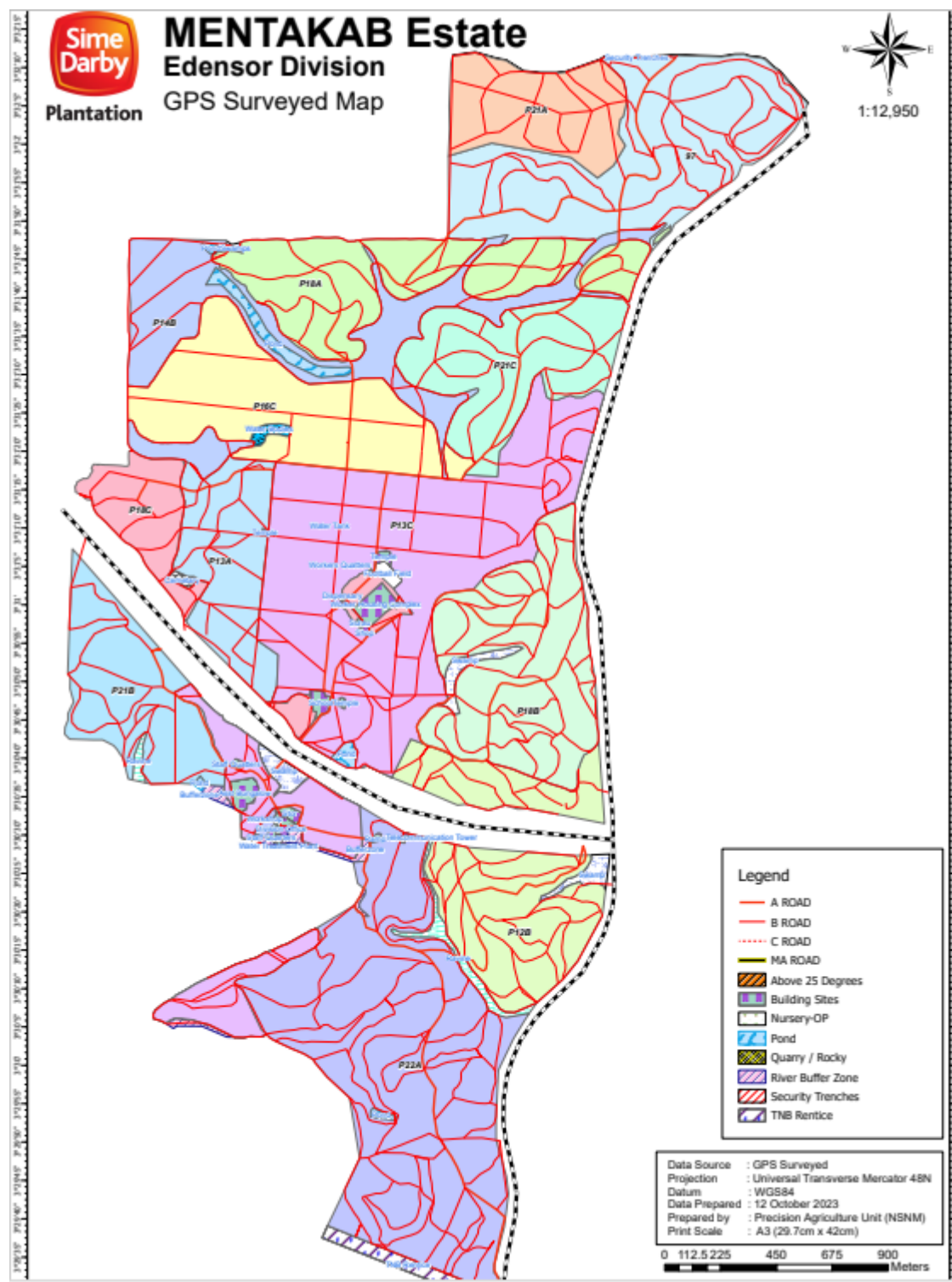




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## Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other: <i>Please specify</i>
Risk Factor Applied	N/A	N/A	N/A
Justification of Risk Factor Applied			
Number of samples			
Remarks			

[illegible]

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#### Appendix F: List of Abbreviations

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