

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☒ Annual Surveillance Assessment (2_1)

☐ Recertification Assessment (Choose an item.)

☐ Extension of Scope

Client Company Name / Parent Company: TDM Plantation Sdn Bhd
Client Company / Parent Company Address: Level 1, Wisma TDM, 443D, Jalan Kamaruddin, 20400 Kuala Terengganu, Terengganu, Malaysia
Certification Unit: Kemaman Palm Oil Mill Location of Certification Unit: KM 121, Jerangau – Jabor Highway, 24101 Kemaman, Terengganu, Malaysia
Date of Final Report: 17/11/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	TDM Plantation Sdn Bhd		
RSPO Membership Number	1-0095-11-000-00	Membership Approval Date	28/02/2011
Address	Level 1, Wisma TDM, 443D, Jalan Kamaruddin, 20400 Kuala Terengganu, Terengganu, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Kemaman Palm Oil Mill		
Location / Address	KM 121, Jerangau - Jabur Highway, Kemaman, 24101, Terengganu, Malaysia		
Website	www.tdmberhad.com.my		
Management Representative	Mohd Izwan Hafeez bin Che Azmi Tuan Haji Shahbudin Bin Usop (Mill Senior Manager)	E-mail	izwan.tdmp@tdmberhad.com.my
Telephone	+609-620 4800	Facsimile	+609-620 4803

2. Certification Information			
Certificate Number	RSPO 587626	Certificate Start Date	01/11/2023
Date of First Certification	01/11/2013	Certificate Expiry Date	31/10/2028
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input 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 checked="" type="checkbox"/> Identity Preserved; <input 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		

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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 678572	MSPO Part 4 (MS 2530-4:2013) General Principles for Palm Oil Mills	BSI Services (M) Sdn Bhd	14/12/2027
MSPO 686877	MSPO Part 3 (MS 2530-3:2013) General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services (M) Sdn Bhd	14/12/2027
MSPO 778497	MSPO Supply Chain Certification (MSPO-SCCS-01, 01-Sept-2018)	BSI Services (M) Sdn Bhd	08/01/2028

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Kemaman Palm Oil Mill	KM 121, Jerangau – Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4°24'10.80" N	103°14'52.80" E
Pelantoh Estate	KM 121, Jerangau – Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4°24'19.23" N	103°14'59.64" E
Tebak Estate	KM 121, Jerangau – Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4°25'48.61" N	103°13'35.40" E
Jernih Estate	KM 121, Jerangau – Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4°26'24.00" N	103°12'39.59" E
Air Putih Estate	PT 2143-2147, Mukim Tebak & 1209-1213, Mukim Bandi, 24007 Kemaman, Terengganu, Malaysia	4°15'18.59" N	103°12'38.77" E
Gajah Mati Estate	Ladang Gajah Mati, 23200 Bukit Besi, Dungun, Terengganu, Malaysia	4°41'45.05" N	103°12'23.30" E
MAIDAM Estate	Jalan Kuala Jengal – Jongok Batu, Kampung Jongok Batu, 23000 Kuala Dungun, Terengganu, Malaysia	4°39'42.90" N	103°08 '38.00"E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pelantoh Estate	2,604.52	3.02	438.46	3,046.00	85.51
Tebak Estate	2,510.03	5.14	399.86	2,915.03	86.11
Jernih Estate	2,282.10	73.61	395.26	2,750.97	82.96
Air Putih Estate	3,839.73	126.01*	918.53*	4,884.27	78.61
Gajah Mati Estate	2,933.64	62.17	888.24	3,884.05	75.53
MAIDAM Estate	356.76	7.52	542.36	906.64	39.35
Total	14,526.78	277.47	3,582.71	18,386.96	79.00
Note *The HCV area total was not change however wrong data inserted as previous report for HCV and Infrastructure For Air Putih Estate. Refer HCV Report for Bukit Besi Complex and Kemaman Complex dated Feb 2023 and GIS confirmation email dated 05/02/2023.					

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Pelantoh Estate	980.5	817.69	10.32	796.01	1,624.02	980.5
Tebak Estate	560.89	661.71	193.04	1,094.39	1,949.14	560.89
Jernih Estate	510.93	314.9	1,269.99	186.28	1,771.17	510.93
Air Putih Estate	269.6	2,384.93	0	1,185.20	3,570.13	269.6
Gajah Mati Estate	502.84	1,928.77	0	502.03	2,430.80	502.84
MAIDAM Estate	55.52	113.17	0	188.07	301.24	55.52
Total (ha)	2,880.28	6,221.17	1,473.35	3,951.98	11,646.50	2,880.28
Note: Only Mature area is considered as production area						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Nov 2023 – Oct 2024)	Actual (Oct 2023 – Aug 2024)		Forecast (Nov 2024 – Oct 2025)
		Previous license period (Oct 2023)	Current license period (Nov 2023 – Aug 2024)	
Pelantoh Estate	14,850.00	1,460.57	11,799.43	18,400.00

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Tebak Estate	25,500.00	2,219.07	17,437.38	25,800.00
Jernih Estate	28,450.00	2,505.05	18,565.45	29,600.00
Air Putih Estate	58,730.00	5,885.41	37,047.74	57,100.00
Gajah Mati Estate	32,850.00	3,547.06	22,224.88	39,900.00
MAIDAM Estate	2,121.00	156.53	1,410.22	2,790.00
	162,501.00	124,258.79		173,590.00

Note: Low yield performance due to most of the area was immature. Other than that, the monsoon season that affected the harvesting operation. High rainfall as per data verification. Estate management already planned on increasing harvester land ratio for crop recovery. Forecast for the next remained as data since management was on going to rehabs some area for crop recovery.

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Nov 2023 – Oct 2024)	Actual (Oct 2023 – Aug 2024)		Forecast (Nov 2024 – Oct 2025)
		Previous license period (Oct 2023)	Current license period (Nov 2023 – Aug 2024)	
Pinang Emas Estate		2,037.58	15,041.99	
Jerangau Estate		1,660.61	13,001.12	
Tayor Estate		-	3,080.40	
Jaya Estate		-	8,888.92	
Fikri Estate		-	4,505.18	
Pelung Estate		-	126.21	
Total		48,342.01		18858.64

Note: Certified FFB was received from sister estate under TDM Sg Tong POM. Refer TBP.

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

Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Nov 2023 – Oct 2024)	Actual (Oct 2023 – Aug 2024)		Forecast (Nov 2024 – Oct 2025)
		Previous license period (Oct 2023)	Current license period (Nov 2023 – Aug 2024)	
-	-	-	-	-
Total	-	-		-

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	Oct 2023	19,471.88	-	19,471.88
2	Nov 2023	18,206.20	-	18,206.20
3	Dec 2023	21,996.91	-	21,996.91
4	Jan 2024	10,907.53	-	10,907.53
5	Feb 2024	12,947.25	-	12,947.25
6	Mar 2024	11,666.29	-	11,666.29
7	Apr 2024	14,235.51	-	14,235.51
8	May 2024	7,882.68	-	7,882.68
9	June 2024	14,455.78	-	14,455.78
10	July 2024	22,010.52	-	22,010.52
11	Aug 2024	18,820.25	-	18,820.25
12	-	-	-	-
TOTAL		172,600.80	-	172,600.80

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Nov 2023 – Oct 2024)	Actual (Oct 2023 – Aug 2024)		Forecast (Nov 2024 – Oct 2025)
	Previous license period (Oct 2023)	Current license period (Nov 2023 – Aug 2024)	
FFB	FFB		FFB
235,671.00 mt	19,471.88 mt	153,128.92 mt	173,590.00 mt
	TOTAL	172,600.80 mt	
CPO (OER: 21.00%)	CPO (OER: 19.90%)		CPO (OER: 20.85%)
49,136.35 mt	4,157.57 mt	30,191.72 mt	36,191.72 mt
	TOTAL	34,349.23 mt	
PK (KER: 4.67%)	PK (KER: 4.26%)		PK (KER: 4.46%)
10,883.48 mt	804.06 mt	6,544.14 mt	7,744.14 mt
	TOTAL	7,348.20 mt	
Note: Volume extension has been request and approved by RSPO for additional volume for FFB, CPO and PK as below: FFB: 73,170 MT CPO: 15,000 MT PK: 3,293 MT			

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High processed due to crop diversion from certified sister estate under TDM Sg Tong POM certification units.

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

No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Oct 2023	4,157.51	804.06
2	Nov 2023	3,749.91	786.32
3	Dec 2023	4,155.50	1,098.99
4	Jan 2024	2,135.82	487.46
5	Feb 2024	2,474.80	552.30
6	Mar 2024	2,268.44	478.06
7	Apr 2024	3,025.36	608.08
8	May 2024	1,512.54	305.89
9	June 2024	2,859.44	587.82
10	July 2024	4,396.60	915.44
11	Aug 2024	3,613.31	723.78
12	-	-	-
TOTAL		34,349.23	7,348.20

11. Summary of Actual Volume sold

Current License period (Nov 2023 – Aug 2023)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	30,203.71	-	-	255.74	30,459.45
PK (MT)	6,545.44	-	-	-	6,545.44
Credits	-	-	-	-	-

Previous License period (Oct 2023)

CPO (MT)	3,796.53	-	-	-	3,796.53
PK (MT)	544.91	-	-	-	544.91
Credits	-	-	-	-	-

Note: Removal of certified CPO sold as conventional will be made on the end of licence period.

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	34,000.24	7,090.35

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TOTAL	34,000.24	7,090.35
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	255.74	0.00
TOTAL		255.74	0.00
Note: Removal will be made at the end of licence period since the sold as conventional in the current licence.			

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
	-	-	-
TOTAL			-

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)
-	-	-	-	-	-	-
TOTAL		-	-	-	-	-
Note: 1 mt = 1 credit						

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (-)							
Credits				-	-	-	-
Physical	-	-	-				
Previous License period (-)							
Credits				-	-	-	-
Physical	-	-	-				

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.

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **22-26/09/2024**. 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 remote assessment was conducted on **03/11/2024**. 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.

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification 2)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Kemaman POM	✓	✓	✓	✓	✓
Pelantoh Estate	✓		✓	✓	
Tebak Estate	✓	✓		✓	✓
Jernih Estate		✓	✓		✓
Air Putih Estate	✓	✓		✓	✓
Gajah Mati Estate		✓	✓		✓
MAIDAM Estate	✓		✓	✓	

Tentative Date of Next Visit: September 21, 2025 - September 25, 2025

Total Number of Mandays: 15 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Nor Halis Abu Zar (NHA)	Team Leader	<p>Education: 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>Work Experience: 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>Training attended: He has completed RSPO P&C Lead Auditor Course in Oct 2020, Refresher RSPO P&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 & ISO 14001:2015) Lead Auditor Course, HCV &</p>

		<p>HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021 & ISH Training by RSPO in August 2023</p> <p>Language proficiency: Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Hafriazhar Mohd Mokhtar (HMM)	Team Member	<p>Education: Bachelor of Engineering (Hons.) Chemical Engineering, UTM</p> <p>Work Experience: Has more than 20 years of working experience in multiple engineering disciplines emphasized on science, technology, and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation, and mining before auditing. In summary, his started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies</p> <p>Training attended: ILO Training (2024), HCV Training (2023), GHG Training (2022), Social Auditing & SMETA Training (2021), MSPO SCCS LA Training (2020), MSPO LA Training (2019) ISO 45001 LA Training (2018), RSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2014), ISO 50001 LA Training (2013), VCS Training (2012), CDM Training (2011), ISO 14001 LA Training (2011)</p> <p>Language proficiency: Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Fahmi Othman (FO)	Team Member	<p>Education: Bachelor's Degree in Industrial Biology from Universiti Teknologi Malaysia, graduated in 2010.</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an Assistant Manager with a plantation company managing the day-to-day plantation operations before acting as Sustainability Officer for another significant 4 years. In his career, Fahmi had accumulated more than 9 years of sustainability implementation experience including workers' welfare,</p>

		<p>workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Prior to joining BSI, he was an auditor for another local certification body who experienced in MSPO and PEFC Certification Audit.</p> <p>Training attended:</p> <p>He has completed CQI – IRCA approved ISO 9001, and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course as well as SA 8000.</p> <p>Language proficiency:</p> <p>Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
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Accompanying Persons:

Name	Role
-	-

2.3 Assessment Plan

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

Date	Time	Subjects	NHA	HMM	FBO
Saturday 21/09/2024	-	Audit Team Travel to Kemaman	√	√	√
Sunday 22/09/2024 Gajah Mati 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	√	√	√

Date	Time	Subjects	NHA	HMM	FBO
	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	√	√	√
Monday 23/09/2024 Kemaman POM	0830 - 1230	<p>Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, 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"> • SCCS Module • Internal Audit • Outsourcing activities • Purchasing and Goods In • Sales and Goods Out - Outsourcing Activities • Record keeping - Extraction Rate • Processing • Registration of transaction – Claims • Rules on market communication and claim 	√	√	√
	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	√	√	√
Tuesday 24/09/2024 Air Putih Estate	0830 - 1230	<p>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.</p> <p>Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)</p>	√	√	√

Date	Time	Subjects	NHA	HMM	FBO
	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	√	√	√
Wednesday 25/09/2024 Tebak Estate	0830 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc. • Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)	√	√	√
	1300 - 1400	Lunch Break	√	√	√
	1400 - 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	√	√	√
Thursday 26/09/2024 Jernih Estate	0830 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc. Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)	√	√	√
	1300 - 1400	Lunch Break	√	√	√
	1400 - 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.)	√	√	√

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Date	Time	Subjects	NHA	HMM	FBO
	1600 - 1700	Audit team discussion & Closing Meeting	√	√	√
Friday 27/09/2024	-	Audit Team Travel back to KL	√	√	√

Major NC Close Out

Date	Time	Subjects	NHA
Saturday 02/11/2024	-	Auditor Travel to Hotel	√
Sunday 03/11/2024 Kemaman POM Gajah Mati Estate Air Putih Estate	7.30	Auditor Travel to Site	√
	0830 - 1200	Soft Opening Meeting: <ul style="list-style-type: none"> • Verification on previous Major NC: <ul style="list-style-type: none"> • 2552293-202409-M1 • 2552293-202409-M2 • 2552293-202409-M3 • Site observation, workers interview (individual and group session) if necessary • Document review – implemented evidence 	√
	1200 - 1300	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?	Yes. Please refer to Approved Time Bound Plan for details on the mills and estates of TDM Plantation Sdn. Bhd. Group.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Except for the 2020 acquired TDM-YT Bukit Bidong Estate, all estates and mills in Malaysia has been certified within five years. Certification for sites in Indonesia has been deemed unnecessary as the operation and management control are already transferred to Ikhasas Sawit Sdn. Bhd.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No. TDM-YT Bukit Bidong Estate was acquired in 2020 from Tabung Haji Plantation. The estate has been planned to be audited and certified by August 2026 (approved by RSPO as per communication email with RSPO Secretariat dated 29/03/2023)	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	There is no deviation since RSPO was approved the TBP dated 29/03/2023. Bukit Bidong Estate will be certified on 2026.	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?	Yes, the approved year of certification for TDM-YT Bukit Bidong Estate was deviated from 2023 to 2026 as per RSPO Secretariat approval dated 29/03/2023. The justification for this was due to the estate was still recovering from financial and production losses.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No, there has not been any isolated lapses in the implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No, there is no fundamental failure in implementation of the plan.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	No replacement of forest or any HCV area after dates defined in this Criterion 7.12 involving primary forest. TDM-YT Bukit Bidong Estate has	Complied

	already been conducted it's HCV assessment by Sabarinah& Associates Sdn. Bhd.	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings since 1 st January 2010 that requires compliance with the RSPO New Plantings Procedure.	Complied
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.	Based on RSPO RaCP tracker, there is 1 case of management unit with potential liability, Concept Note and Remediation Plan required which is TDM-YT Bukit Bidong Estate. The estate already conducted it's HCV assessment and the report is ready to be reviewed. Refer https://rspo.org/as-an-organisation/tools/remediation-and-compensation/racp-trackers/	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	TDM Plantation Sdn Bhd have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism. No labour dispute reported in the uncertified units. 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 including interviews conducted.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	The desktop study conducted before the assessment has confirmed that there are no reported instances of legal non-compliance in the uncertified unit, specifically in TDM-YT Bukit Bidong Estate.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes, internal audit was done and the uncertified unit TDM-YT Bukit Bidong Estate is ready to be certified. Internal audit was conducted on 31/07/2024. There is 1 Major NC has been raised which is RaCP is still pending RSPO review and approval.	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 last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	Yes, the estate is still in compliance with 7.12.8 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 and TDM-YT Bukit Bidong Estate is still waiting for it's next course of action from RSPO. Email was sent to RSPO Compensation Secretariat on 25/06/2024 and pending reply from them.	Complied

Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholders including NGO were consulted in the uncertified unit and documented. Latest stakeholder meeting was conducted on 28/08/2024.	Complied
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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)	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
KEMAMAN	KEMAMAN PALM OIL MILL	21.94	Certified		2013	1st July 2022	No			
	JERNIH ESTATE	3,135.60	Certified		2013	1st July 2022	No			
	PELANTOH ESTATE	3,291.60	Certified		2013	1st July 2022	No			
	TEBAK ESTATE	3,293.63	Certified		2013	1st July 2022	No			
	AIR PUTIH ESTATE	4,351.98	Certified		2013	1st July 2022	No			
	MAIDAM ESTATE	914.08	Certified		2013	1st July 2022	No			
	GAJAH MATI ESTATE	3,882.78	Certified		2013	1st July 2022	No			
SUNGAI TONG	SUNGAI TONG PALM OIL MILL	20.79	Certified		2013	1st July 2022	No			
	FIKRI ESTATE	3,711.05	Certified		2013	1st July 2022	No			

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	PELONG ESTATE	3,012.20	Certified		2013	1st July 2022	No			
	TAYOR ESTATE	2,219.92	Certified		2013	1st July 2022	No			
	JAYA ESTATE	3,455.79	Certified		2013	1st July 2022	No			
	PINANG EMAS ESTATE	3,870.18	Certified		2013	1st July 2022	No			
	JERANGAU ESTATE	1,480.93	Certified		2013	1st July 2022	No			
	TDM-YT BUKIT BIDONG ESTATE	2,594.50	Not Certified	Aug-26	Uncertified	N/A	Yes	2026	The estate is currently facing losses of up to RM12MIL for 2022 and rehabilitation works are already planned and executed.	29/3/2023

On 27/02/2023, the Head of Sustainability & Risk Unit for TDM Plantation Sdn. Bhd. formally requested approval from the RSPO Secretariat to revise the Time Bound Plan of TDM Plantation Sdn. Bhd. This revision pertained to the postponement of the RSPO certification process for TDM Plantation Sdn. Bhd., particularly TDM-YT Bukit Bidong Estate, which initially scheduled for completion by August 2023. The request was made due to experiencing losses and is still recuperating, rendering it unable to meet the initially set deadline.

Subsequently, on 29/03/2023, the Head of Certification for the RSPO Secretariat responded to this request via email to the Head of Sustainability & Risk Unit for TDM Plantation Sdn. Bhd. The response conveyed the RSPO Secretariat's agreement with the proposed new timeline for certification under TDM Plantation Berhad, extending the deadline to 2026. However, it was emphasized that this approval is subject to the fulfilment of related Time Bound Plan requirements stated in the RSPO Certification System documents by the RSPO Members.

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 *Three* (3) Critical; *One* (1) Minor nonconformities and *no of OFI* Opportunity For Improvement raised. The TDM Kemaman 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 #	2552293-202409-M1	Issued Date	26/09/2024
Due Date	25/12/2024	Closure Date	03/11/2024
Indicator & Category (Critical / Minor)	3.6.1 Critical		
Statement of Nonconformity:	Mitigation plans to control identified H&S issues were insufficiently 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>Mitigation plan to control identified risks were insufficiently implemented for operations as following:</p> <p>Gajah Mati Estate:</p> <p>Visit to Field # P18B/1 for Manuring of Compound 33 (10/3/20+0.5%B2O3) operation, it was found that no eye protection worn by manuring workers while applying the fertilizer. Based on HIRARC for Manuring operation, it was identified that the existing control/mitigation plan for identified risk of fertilizer exposure/splash to eye is to wear eye protection. It was also verified that the Safety Data Sheet (SDS) of Compound 33 (10/3/20+0.5%B2O3) fertilizer that the eye protection required is safety goggles. Hence, the manuring workers were insufficiently implemented its control/mitigation plan for identified risk and hazard of the operation.</p> <p>Kemaman Palm Oil Mill:</p> <p>Visit to mill FFB ramp operation found that a shovel being use for FFB shovelling. Test on the shovel found that the honk and signal light were not functioning. Based on HIRARC for prime mover machine which includes shovel, it was identified that the existing control/mitigation plan for identified risk of accident is to ensure good maintenance and functionality of safety related features of shovel including reverse alarm, rotary light, head light, signal and honk etc. Hence, the shovel operation was insufficiently implemented its control/mitigation plan for identified risk and hazard of the operation.</p> <p>Air Putih Estate:</p> <p>Visit to Field # P14C/3 for Harvesting involving Mechanical Buffalo/Badang operation, it was found that the operator did not wear safety helmet while loading FFB and operating the machine. Based on HIRARC of Mechanical Buffalo/Badang, it was identified that the existing control/mitigation plan for identified risk of</p>		

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	body/head injury is to wear PPE which includes safety helmet. Hence, the Mechanical Buffalo/Badang operation operation was insufficiently implemented its control/mitigation plan for identified risk and hazard of the operation.
Corrections:	<p>Gajah Mati estate</p> <p>To review and revise PPE Matrix for manuring section by adding goggles for eye protection</p> <p>To provide safety goggles for all manuring workers.</p> <p>Kemaman POM</p> <p>Accordingly repairing and troubleshooting the system to make sure all safety and wiring of shovel functionable.</p> <p>Air Putih estate</p> <p>Establish a routine training program that reinforces safety procedures for all operators, focusing on the proper operation and associated risks of using machinery like the Mechanical Buffalo/Badang. This program should emphasize HIRARC-based safety controls, particularly the mandatory use of PPE such as safety helmets.</p>
Root Cause Analysis:	Insufficient monitoring or auditing of daily operations to ensure workers adhere to safety protocols.
Corrective Actions:	<p>Develop and distribute safety checklists for operators to use before commencing work. These checklists should include mandatory PPE requirements and operational safety protocols.</p> <p>To improve awareness and communication with the maintenance workers / person in charge to ensure the PPE wearing and procedure is followed and to perform refreshment training to all workers.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <p>Training on Manuring, PPE, and SDS was conducted for Gajah Mati Estate on 23/09/2024, with accompanying training materials, attendance records, and photos. Each participant's training evaluation has been documented. The HIRARC was revised on the same date to include PPE in accordance with SDS recommendations, and the PPE Matrix was reviewed and updated as per SDS requirements. A site visit to the Manuring Operation confirmed that implementation aligned with the HIRARC and PPE Matrix. Interviews with sampled workers demonstrated good awareness of the training received.</p> <p>On 29/10/2024, shovel safety training was conducted for Kemaman POM, complete with training materials, attendance, and photos, and each participant's training evaluation was recorded.</p> <p>Training for Tractor and Badang drivers at Air Putih Estate was conducted on 07/10/2024, also including training materials, attendance, and photos, with documented evaluations for each participant. Vehicle inspections have been implemented with close monitoring by supervisors. Vehicle inspection checklists have been maintained starting from October 2024, with safety training provided alongside.</p> <p>A site visit confirmed all vehicles are in good condition and functioning properly. Interviews with drivers showed they have a strong awareness of the procedures. Additionally, interviews with the management team confirmed that all corrective actions were conducted as required. Based on the above evidence, the major non-</p>

	Conformity is closed effectively on 03/11/2024. Continuous implementation will be further verified in the next assessment.
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Non-conformity			
NCR Ref #	2552293-202409-M2	Issued Date	26/09/2024
Due Date	25/12/2024	Closure Date	03/11/2024
Indicator & Category (Critical / Minor)	General Corporate Communication 4.1 Critical		
Statement of Nonconformity:	Trademark license used was expired.		
Requirement Reference:	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.		
Objective Evidence:	Based on verification through website https://www.tdemberhad.com.my/who-we-are/plantation-division/ , it was found the used of trademark license #1-0095-11-100-00 which already expired on 12/04/2024.		
Corrections:	<p>Correction of the issue:</p> <p>Identify the correct signee:</p> <ol style="list-style-type: none"> 1. Contact RSPO Trademark secretariat to update the correct signee for the document. 2. Ensure correct signee details (name, designation, phone number) are updated in the RSPO's Trademark system (MyRSPO). 3. Reapply for the Trademark License: Initiate the reapplication or renewal process for the trademark license immediately. <p>Containment of future issues:</p> <p>Engage communication with RSPO Trademark personnel shall there be any changes in the management team or any updates on the company.</p>		
Root Cause Analysis:	<p>The cause of the trademark license expiration (#1-0095-11-100-00) on 12/04/2024 was attributed to confusion regarding the designated signee's name and the method of signing during the online signing process. Specifically:</p> <ol style="list-style-type: none"> 1. Confusing Signee Name: The designated individual responsible for signing may have been misidentified or inaccurately listed. 2. Improper Online Signing Process: The process of electronically signing the document may have been mishandled. Errors occurred due to unfamiliarity with digital signing protocols and technical issues within the online signing platform itself. 		
Corrective Actions:	The trademark license has already been renewed with license number of 1-0095-11-100-00 and new license expiration date on 26 th September 2026. In the future, to avoid the same major from repeating, Immediate renewal of the trademark license, Standardize the signature protocols. All company documents will be signed by the CEO, Set up renewal alerts and reminders, Regular review and monitoring including internal audit protocol to also check on the validity of the license.		

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Assessment Conclusion:	<p>Major NC Close Out</p> <p>The RSPO Trademark License (License number: 1-0095-11-100-00) has been renewed, valid from 27/09/2024 to 26/09/2026. According to an interview with the management representative, this matter will be monitored regularly and reviewed during the annual internal audit. Please refer to the HQ Memo dated 01/10/2024</p> <p>Based on the above evidence, the major non-Conformity is closed effectively on 03/11/2024. Continuous implementation will be further verified in the next assessment.</p>
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Non-conformity																											
NCR Ref #	2552293-202409-M3	Issued Date	26/09/2024																								
Due Date	25/12/2024	Closure Date	03/11/2024																								
Indicator & Category (Critical / Minor)	6.2.4 Critical																										
Statement of Nonconformity:	The monitoring and management plan for the linesite inspection was not efficiently and effectively demonstrated.																										
Requirement Reference:	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.																										
Objective Evidence:	<p>Weekly linesite inspections are carried out by Estate Health Assistant using the form and logbook. The inspection commonly will be verified by assistant manager and any follow up action will be monitored closely. Details of linesite inspection conducted as table below:</p> <table border="1"> <thead> <tr> <th>Estate/Mill</th><th colspan="3">Date of inspection</th></tr> </thead> <tbody> <tr> <td>Gajah Mati Estate</td><td>15/09/2024</td><td>09/09/2024</td><td>01/09/2024</td></tr> <tr> <td>Kemaman POM</td><td>19/09/2024</td><td>12/09/2024</td><td>05/09/2024</td></tr> <tr> <td>Air Putih Estate</td><td>22/09/2024</td><td>17/09/2024</td><td>10/09/2024</td></tr> <tr> <td>Tebak Estate</td><td>23/09/2024</td><td>16/09/2024</td><td>09/09/2024</td></tr> <tr> <td>Jernih Estate</td><td>23/09/2024</td><td>18/09/2024</td><td>03/09/2024</td></tr> </tbody> </table> <p>After reviewing the documents from Gajah Mati Estate and Air Putih Estate, it was confirmed that all checklist parameters were marked as being in good condition, with no observations requiring improvements noted. However, during the site inspection, it was noted that the actual conditions did not align with the inspection records. Issues such as broken windows, lubricant oil container, blocked water flow, damaged ceilings, a deteriorating garage structure, and the presence of empty chemical containers were observed.</p>			Estate/Mill	Date of inspection			Gajah Mati Estate	15/09/2024	09/09/2024	01/09/2024	Kemaman POM	19/09/2024	12/09/2024	05/09/2024	Air Putih Estate	22/09/2024	17/09/2024	10/09/2024	Tebak Estate	23/09/2024	16/09/2024	09/09/2024	Jernih Estate	23/09/2024	18/09/2024	03/09/2024
Estate/Mill	Date of inspection																										
Gajah Mati Estate	15/09/2024	09/09/2024	01/09/2024																								
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Tebak Estate	23/09/2024	16/09/2024	09/09/2024																								
Jernih Estate	23/09/2024	18/09/2024	03/09/2024																								
Corrections:	Gajah Mati estate																										

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	<p>To perform regular checking and monitoring linesite after linesite inspection has been done by management.</p> <p>Starting October 2024, to create a new format of weekly linesite inspection and comment if there are any issues with the housing area.</p> <p>Air Putih estate</p> <p>Develop a more rigorous and standardized inspection protocol that requires inspectors to thoroughly assess all parameters to ensure no issues are overlooked. This protocol should include comprehensive checklists with detailed criteria for each area of inspection, along with mandatory photo documentation and written descriptions of key areas, such as structural integrity, water flow, and equipment conditions.</p>
Root Cause Analysis:	<p>Gajah Mati estate</p> <p>The attitude of workers who do not keep the housing area clean and others issues like plumbing failures and structural weakness due to old housing area.</p> <p>Air Putih estate</p> <p>Inspections may have been conducted hastily or superficially, failing to identify or address key issues such as broken windows, blocked water flow, and deteriorating structures.</p>
Corrective Actions:	<p>Gajah Mati estate</p> <p>Weekly linesite inspection by HA need to be done and verified by the manager, assistant, Manager, compliance clerk to ensure the inspection is align with the actual condition. To create a linesite cleanliness committee member among estate management and appoint. Person in charge for each house block. To install new signboard "Zon Larangan" awareness signage at housing area.</p> <p>Air Putih estate</p> <p>The existing inspection checklist was revised to include more detailed parameters that accounted for structural integrity, facility maintenance, and waste management, such as the presence of chemical containers. These additions ensured that no key issues were missed during future inspections, allowing for a more comprehensive evaluation of the site's overall condition and addressing previously overlooked concerns.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <p>A new format for line site inspections has been established. Recent inspections over the last four weeks were checked and verified by the manager. A Linesite Committee was formed on 23/09/2024, with reference number TDMP/LGM/24/09-58, and a person in charge for each block was appointed per an official letter dated 23/09/2024. Awareness signage has been placed at the line site to enhance awareness among workers. A recent inspection of the line site area confirmed that implementation was in order.</p> <p>The revised line site inspection format now includes a more detailed checklist. Refer to the line site inspection record dated 21/10/2024. Training on line site inspection was conducted on 21/10/2024, including training materials, attendance, and photos, with evaluations documented for each participant.</p> <p>An interview with the Management Team (MA and HA) indicated that corrective actions have been satisfactorily implemented.</p>

	Based on the above evidence, the major non-Conformity is closed effectively on 03/11/2024. Continuous implementation will be further verified in the next assessment.
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Non-conformity											
NCR Ref #	2552293-202409-N1	Issued Date	26/09/2024								
Due Date	Next Assessment	Closure Date	Next Assessment								
Indicator & Category (Critical / Minor)	2.2.2 Minor										
Statement of Nonconformity:	The contractor engaged by the certification unit were not able to demonstrate the compliance of legal requirement and contract agreement.										
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.										
Objective Evidence:	<p>Kemaman POM</p> <p>Sutera Adela Enterprise is a contractor appointed by the mill to transport CPO and PK to the buyer from 01/01/2024 to 31/12/2025. Based on an interview with the person in charge and a review of the documents, it was found that the contractor was unable to provide the MPOB license as legal compliance evidence for CPO transportation. This is in contradiction to the Malaysian Palm Oil Board Act 1998, Section 3(1), which states that no person shall carry out activities such as producing, processing, or transporting palm oil and its products without obtaining a valid MPOB license</p> <p>Tebak Estate</p> <p>A machine rental contractor was appointed at the estate for road and trench maintenance activities. Upon reviewing the due diligence documents, it was noted that the contractor was unable to provide evidence of machinery insurance as required by the term and condition in agreed contract agreement under Clause 6, which states that the operator and machinery used must have insurance coverage to protect workers and machinery in the event of an accident or death during the execution of the work. Details contractor involved as below:</p> <table><tr><td>Contractor</td><td>Job Description</td><td>Validity of Agreement</td></tr><tr><td rowspan="2">Koperasi Ladang Sawit kemaman Terengganu Sdn Bhd</td><td>Bulldozer Rental</td><td>01/08/2024 -31/10/2024</td></tr><tr><td>Excavator Rental</td><td>01/08/2024-31/10/2024</td></tr></table> <p>Air Putih Estate</p> <p>Serai Kasih Enterprise is a contractor engaged by estate to carry out harvesting work. Reviewed the sampled payslips. SOCSO Contribution Form 8A of contractors</p>			Contractor	Job Description	Validity of Agreement	Koperasi Ladang Sawit kemaman Terengganu Sdn Bhd	Bulldozer Rental	01/08/2024 -31/10/2024	Excavator Rental	01/08/2024-31/10/2024
Contractor	Job Description	Validity of Agreement									
Koperasi Ladang Sawit kemaman Terengganu Sdn Bhd	Bulldozer Rental	01/08/2024 -31/10/2024									
	Excavator Rental	01/08/2024-31/10/2024									

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	<p>for the month of July 2024, found that the SOCSO contribution made was not in accordance with Employees’ Social Security Act 1969 (Act 4). The details are as below:</p> <table><tr><th>Workers Passport No.</th><th>Gross Salary</th><th>SOCSCO Contribution in Workers’ Payslip</th><th>SOCSCO Contribution Form 8A from the contractor</th><th>Total Rate of contribution as per Employees’ Social Security Act 1969 (Act 4)</th></tr><tr><td>E0182XXX</td><td>RM3,067.99</td><td>RM32.60</td><td>RM32.60</td><td>RM68.60</td></tr><tr><td>E6874XXX</td><td>RM3,067.99</td><td>RM32.60</td><td>RM32.60</td><td>RM68.60</td></tr><tr><td>E4935XXX</td><td>RM3,067.99</td><td>RM32.60</td><td>RM32.60</td><td>RM68.60</td></tr></table>	Workers Passport No.	Gross Salary	SOCSCO Contribution in Workers’ Payslip	SOCSCO Contribution Form 8A from the contractor	Total Rate of contribution as per Employees’ Social Security Act 1969 (Act 4)	E0182XXX	RM3,067.99	RM32.60	RM32.60	RM68.60	E6874XXX	RM3,067.99	RM32.60	RM32.60	RM68.60	E4935XXX	RM3,067.99	RM32.60	RM32.60	RM68.60
Workers Passport No.	Gross Salary	SOCSCO Contribution in Workers’ Payslip	SOCSCO Contribution Form 8A from the contractor	Total Rate of contribution as per Employees’ Social Security Act 1969 (Act 4)																	
E0182XXX	RM3,067.99	RM32.60	RM32.60	RM68.60																	
E6874XXX	RM3,067.99	RM32.60	RM32.60	RM68.60																	
E4935XXX	RM3,067.99	RM32.60	RM32.60	RM68.60																	
Corrections:	<p>Kemaman POM</p> <p>Contract agreement between TDMP will be change to Ozaini Enterprise which register under MPOB license.</p> <p>Liase with HQ procument to add Ozaini Enterprise as a vendor list.</p> <p>Tebak estate</p> <p>Koperasi Ladang Sawit Kemaman Terengganu Sdn. Bhd. must ensure that the appointed subcontractor has complete vehicle insurance even if machinery such as bulldozers and excavators are not used on the main road.</p> <p>Air Putih estate.</p> <p>Implement a structured schedule for regular internal audits of payroll processes, at least quarterly, to ensure ongoing compliance with SOCSO contributions and other legal obligations. Audits should focus on verifying the accuracy of payslips and adherence to contribution rates.</p>																				
Root Cause Analysis:	<p>Kemaman POM</p> <p>Sutera Adila have subsidiary company which Ozaini Enterprise, and any related activities such as transporting palm oil and its products using a valid MPOB license under Ozaini Enterprise.</p> <p>Tebak estate</p> <p>Subcontractors Koperasi Ladang Sawit Kemaman Terengganu Sdn. Bhd. could not provide insurance for machinery such as bulldozers and excavators as requested in the work agreement.</p> <p>Air Putih estate</p> <p>The absence of regular internal audits or checks on payroll processes may have allowed these discrepancies to go unnoticed, resulting in continued non-compliance with SOCSO contribution requirements.</p>																				
Corrective Actions:	<p>Kemaman POM</p> <p>PIC will closely monitoring to this matter related to legal compliance for CPO transportation including provide the MPOB license and term condition in contract</p>																				

	<p>agreement also in Malaysian Palm Oil Board Act 1998, Section 3(1), regarding to transporting palm oil and its products.</p> <p>Tebak estate</p> <p>Koperasi Ladang Sawit Kemaman Terengganu Sdn. Bhd. replacement of a new subcontractor in 2025 who is carrying out work on TDMP estate.</p> <p>Air Putih estate</p> <p>A comprehensive audit of all payroll records and SOCSO contributions for the current and previous months was initiated to identify discrepancies and ensure compliance with the Employees' Social Security Act 1969. This audit included a thorough review of all workers' payslips and SOCSO Contribution Form 8A.</p>
Assessment Conclusion:	CAP has been accepted. The effectiveness of the implementation will be verified during next audit.

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 #	2412049-202310-M1	Issued Date	26/10/2023
Due Date	24/01/2024	Closure Date	02/01/2024
Indicator & Category (Critical / Minor)	3.8.16 (Major)		
Statement of Nonconformity:	The shipping announcement in the RSPO PalmTrace was not correctly made.		
Requirement Reference:	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>		
Objective Evidence:	<u>Location: Kemaman Palm Oil Mill</u>		

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	Based on samples of PalmTrace transaction, it was found that the SC Model announced for Transaction ID no. TR-07617a3d-0609, dated 08/09/2023 i.e., IP for the sale of 257.75 mt certified palm kernel, was not consistent with the related commercial invoice (#IN000015291, dated 25/08/2023) issued i.e., SG.
Corrections:	TDM Trading's representative will communicate with and apprise the buyer of an issue related to the inaccurate shipping announcement in RSPO PalmTrace.
Root Cause Analysis:	The oversight of Transaction ID TR-07617a3d-0609, pertaining to the Shipping Announcement in RSPO PalmTrace, occurred due to a lack of regular scrutiny and monitoring by the designated PIC.
Corrective Actions:	Regular checks, including a monthly review, will be conducted to monitor data input in RSPO PalmTrace. This process involves collaboration between the Trading Department and the designated person in charge at the mill side.
Assessment Conclusion:	<p>The on-site verification was conducted on 02/01/2024. The following supporting evidence was thoroughly reviewed during the on-site verification process:</p> <ol style="list-style-type: none"> (1) Sighted the communication record between General Manager of TDM Trading Department and the buyer on 24/10/2023 regarding the issue related to the inaccurate shipping announcement in RSPO PalmTrace. (2) sighted the appointment letter (TDMP/RSPO/001/2023) dated 14/12/2023 issued to Compliance Executive by Senior Mill Manger as designated person in charge at the mill side to monitor data input in RSPO PalmTrace. (3) Sighted the Monthly Inspection and monitoring for Information of RSPO PalmTrace System & Invocie Details for the month of Nov 2023 and Dec 2023, which was maintained by Compliance Executive and verified by the Senior Mill Manager. <p>During the on-site verification process, it was confirmed that the management had taken the necessary actions to address the identified Major NC. To ensure the effectiveness of the corrective actions, further verification was conducted through interviews with the Senior Mill Manager, General Manager of TDM Trading Department, and Compliance Executive.</p> <p>Based on the findings from the on-site verification, the review of evidence and documents, as well as the interviews conducted with selected personnel, it can be concluded that the corrective action has been implemented effectively. As a result, the identified Major NC has been successfully addressed and closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	Verification was made through Palm Trace and announcement has been made accordingly. Monitoring has been made by the management on monthly basis, this Major NC was remained closed.

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2412049-202310-M2	Issued Date	26/10/2023
Due Date	24/01/2024	Closure Date	02/01/2024
Indicator & Category (Critical / Minor)	5.1.6		
Statement of Nonconformity:	No evidence that the payment to the appointed contractor is made in timely manner.		

Requirement Reference:	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.
Objective Evidence:	<p><u>Location: Kemaman POM</u></p> <p>While examining the evidence of payment for one of the contractor companies appointed by the mill management to provide manpower, materials, equipment, and execute the replacement of the deteriorated C channel with a new one for the hot water tank platform measuring 20 ft x 6 ft (as specified in Surat Perintah Kerja No. P/C05/150/2023 dated 01/08/2023), it was noted that Invoice No. F 00411, dated 30/08/2023, which the mill management received on 05/09/2023, remains unpaid.</p> <p>Furthermore, the contract signed by both parties does not specify the agreed-upon payment terms. This absence of clear payment terms creates challenges for the contractor in demonstrating that any potential delay in payment is not due to their own actions.</p>
Corrections:	<p>(1) To specify and reinstate the agreed-upon payment terms in all contract / Surat Perjanjian Kerja.</p> <p>(2) To conduct briefing to the contractor or any outsources to ensure their understanding of o term in Surat Perjanjian Kerja.</p>
Root Cause Analysis:	<p>(1) The lack of standardization in contracts, particularly the <i>Surat Perjanjian Kerja</i>, by the Headquarters' Account Department</p> <p>(2) Inadequate monitoring by the Person-in-Charge (PIC)</p>
Corrective Actions:	To perform regular checking and monitoring by PIC regarding this matter.
Assessment Conclusion:	<p>The on-site verification was conducted on 02/01/2024. The following supporting evidence was thoroughly reviewed during the on-site verification process:</p> <ol style="list-style-type: none"> (1) Sighted the Memorandum (TDM/CT/1123) dated 30/11/2023 by PIC of Finance (TDM Berhad) to Head of Procurement related to revision of credit term for all contractors and suppliers (from 30 days to 90 days) (2) Sighted e-Payment Voucher (JV 22721) dated 27/11/2023 as evidence that payment has been made to the appointed contractor. (3) Sighted monitoring record of progress payment for each contractor, which was maintained by the Office Clerk and verified by the Senior Mill Manager – latest record is for the month of Dec-2023. (4) Sighted standard template of Letter of Award established by the management, which contain term "Payment to the contractor or supplier must be disbursed within ninety working days after TDMP receives the required documents, including but not limited to the invoice, purchase order, delivery order, service or work receipt note, and any other relevant supporting documents". (5) Sighted record briefing conducted to all contractors and suppliers engaged by the mill management dated 13/12/2023 – briefed on terms and conditions of payment for work order agreements. The briefing was conducted by the Senior Mill Manager and Compliance Executive. <p>During the on-site verification process, it was confirmed that the management had taken the necessary actions to address the identified Major NC. To ensure the effectiveness of the corrective actions, further verification was conducted through interviews with the Senior Mill Manager, one of the contractor companies appointed by the mill management, and Compliance Executive.</p>

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	Based on the findings from the on-site verification, the review of evidence and documents, as well as the interviews conducted with selected personnel, it can be concluded that the corrective action has been implemented effectively. As a result, the identified Major NC has been successfully addressed and closed.
Effectiveness Closure (for previous audit closed Critical NC):	<p>On-site verification conducted during ASA 2_1 found that the mill received FFB from sister estate from own certification unit and FFB diversion from group certified Group mill only. For contractor and supplier other than FFB, payment made within 30 days upon receipt of supplier's invoices. Payment was made through the financial department at head office. Sampled payment sighted as per sample payment for contractors and suppliers on 27/8/2024 as following:</p> <ul style="list-style-type: none"> - Westari Corporation Sdn. Bhd.; Invoice date: 31/7/2024; Payment voucher # PV0772 - Ainmanna Enterprise; Invoice date: 31/7/2024; Payment voucher # PV2297 <p>No recurrence of issue hence Major NC remained close.</p>

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2412049-202310-M3	Issued Date	26/10/2023
Due Date	24/1/2024	Closure Date	02/01/2024
Indicator & Category (Critical / Minor)	6.2.3 (Critical)		
Statement of Nonconformity:	Payment of overtime was not correctly calculated.		
Requirement Reference:	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.		
Objective Evidence:	<p><u>Location: Air Putih Estate</u></p> <p>Based on verification of sampled pay slips at Air Putih Estate, it was found that the price bonus was not taken into account in paying the overtime for a worker (Emp. No. AP2201564) for the month of January 2023.</p>		
Corrections:	<p>(1) Recalculation of the Price Bonus rate that is not included in the total overtime hours for the employees involved according to the MAPA Circular Agreement that has been distributed.</p> <p>(2) Immediate repayment scheme to repay all miscalculation of Price Bonus for all affected workers.</p>		
Root Cause Analysis:	Overtime working hours is not efficiently recorded in the employees check roll book, but the total overtime hours are added up manually at the end of the month causing errors in the summation of OT rates with PB.		
Corrective Actions:	<p>(1) Reimbursement of the price bonus rate according to the number of unpaid overtime hours to the employees involved in October 2023 salary.</p> <p>(2) Training for all account clerks and field officer involved in filling out the check roll book on how to record the amount of overtime work and related payments more efficiently.</p>		

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Assessment Conclusion:	<p>The on-site verification was conducted on 02/01/2024. The following supporting evidence was thoroughly reviewed during the on-site verification process:</p> <ol style="list-style-type: none"> (1) Sighted the Detailed Employee Payslip for the month of Oct 2023 for Employee No. AP2201564, which included the repayment all miscalculation of Price Bonus. (2) Sighted training record "Completion of the Checkroll Book and Related Allowances" dated 30/10/2023. Training was conducted by Chief Clerk and attended by all staffs and clerks. <p>During the on-site verification process, it was confirmed that the management had taken the necessary actions to address the identified Major NC. To ensure the effectiveness of the corrective actions, further verification was conducted through interviews with the Estate Manager, Chief Clerk, Office Clerk, Field Staff, affected worker, and Compliance Coordinator.</p> <p>Based on the findings from the on-site verification, the review of evidence and documents, as well as the interviews conducted with selected personnel, it can be concluded that the corrective action has been implemented effectively. As a result, the identified Major NC has been successfully addressed and closed.</p>												
Effectiveness Closure (for previous audit closed Critical NC):	<p>Verification has been made for payroll documents in three months: January, April and July 2024. The payslips listed all details of daily-rated wages, piece-rated wages, payment for any overtime work done, public holiday pay, and salary deductions. Verification of attendance and punch card of each worker was carried out to confirm payment of overtime was made accordingly.</p> <p>Sample of workers details and information reviewed as below:</p> <table border="1" data-bbox="507 1193 1477 1491"> <thead> <tr> <th>Estate/Mill</th><th>No of payslip samples</th></tr> </thead> <tbody> <tr> <td>Gajah Mati Estate</td><td>14 workers</td></tr> <tr> <td>Kemaman POM</td><td>11 workers</td></tr> <tr> <td>Tebak Estate</td><td>14 workers</td></tr> <tr> <td>Air Putih Estate</td><td>18 workers</td></tr> <tr> <td>Jernih Estate</td><td>15 workers</td></tr> </tbody> </table> <p>It was noted that for those workers paid by fix wages, they entitled for overtime paid and these can be clearly sighted in their payslip with correct calculation by includes the price bonus amount. While for piece rate workers, they were paid according to rate per job that has been briefed by management in advance.</p> <p>Other than that training on 30/10/2023 which explained the Completion of the Checkroll Book and Related Allowances, it was found that there is other training regards to calculation of overtime rate and productivity of piece rate workers need to accomplish for getting the minimum wages has been conducted as well on 24/06/2024.</p> <p>It was confirmed that the Major Non-conformity has been closed and there is no re-occurrence.</p>	Estate/Mill	No of payslip samples	Gajah Mati Estate	14 workers	Kemaman POM	11 workers	Tebak Estate	14 workers	Air Putih Estate	18 workers	Jernih Estate	15 workers
Estate/Mill	No of payslip samples												
Gajah Mati Estate	14 workers												
Kemaman POM	11 workers												
Tebak Estate	14 workers												
Air Putih Estate	18 workers												
Jernih Estate	15 workers												

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2412049-202310-M4	Issued Date	26/10/2023

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Due Date	24/1/2024	Closure Date	02/01/2024
Indicator & Category (Critical / Minor)	7.8.2 (Critical)		
Statement of Nonconformity:	The implementation of management plan for maintaining riparian zones was not satisfactorily demonstrated.		
Requirement Reference:	(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).		
Objective Evidence:	<p><u>Location: of Pelantoh Estate, MAIDAM Estate, and Tebak Estate</u></p> <p>Based on site verification at the buffer zones of Pelantoh Estate (Field no. 21A, along Sungai Tebak), MAIDAM Estate (Field no. 18A1, along Sungai Angka) and Tebak Estate (Field no. 19/A2, along Sungai Mas and 19/A1, along Sungai Tebak), the following lapses were found:</p> <ol style="list-style-type: none"> (1) The buffer zones have been replanted with oil palm in 2021 (Pelantoh Estate), 2018 (MAIDAM Estate), and 2019 (Tebak Estate). This is not inline with TDM's Slope and River Buffer Zone Policy. (2) The number of marking poles (blue/white stripes pegs) was not as many as required in the TDM's Agriculture Policy No. 01.02 Survey and Boundary Demarcation. (3) Some trace of herbicides application at Pelantoh Estate and trace of fertilizer application at Tebak Estate within the buffer zones were seen. 		
Corrections:	<p><u>Pelantoh Estate:</u></p> <p>Installing additional marker poles within the buffer zone to ensure compliance with TDM's Agriculture Policy No. 01.02 Survey and Boundary Demarcation SOP, and to align with workers' awareness of restricted areas for activities such as pesticide application, fertilization, tree planting, and other measures aimed at preserving the river's sustainability.</p> <p><u>MAIDAM Estate:</u></p> <ol style="list-style-type: none"> (1) Remarking the buffer zone will be conducted to ensure the compliance of the TDM's Slope and River Buffer Zone Policy. The marking poles (blue/white stripes pegs) will be place at every 100 m interval alongside the riparian zone (Sungai Angka) according TDM's Agriculture Policy No. 01.02. (2) Management plan will be focused on how to substitute the buffer zone that have been replanted with oil palm to the natural or non-harvested vegetation plant based on the minimum requirement that have been designed to benefit and protect the water system. The estate management will give a proper briefing about the slope and River Buffer Zone Policy to those that involved in the next replanting programme as to ensure this policy strictly followed. <p><u>Tebak Estate:</u></p> <p>Estate management need to install additional marker poles within the buffer zone to ensure compliance with TDM's Agriculture Policy No. 01.02 Survey and Boundary Demarcation SOP, and to align with workers' awareness of restricted areas for activities such as pesticide application, fertilization, palms planting, and other measures aimed at preserving the river's sustainability.</p>		
Root Cause Analysis:	<u>Pelantoh Estate:</u>		

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	<p>Despite the installation of marker poles in the estate's buffer zone in response to concerns raised during the RSPO internal audit in July 2023, their quantity remains insufficient, failing to meet the requirements specified in TDM's Agriculture Policy No. 01.02 Survey and Boundary Demarcation. Additionally, workers still lack the essential knowledge and understanding concerning river sustainability and buffer zones.</p> <p><u>MAIDAM Estate:</u></p> <p>Lack of knowledge on determining the appropriate width of the riparian area resulting in the action taken for replanting the new oil palm on the buffer zone.</p> <p><u>Tebak Estate:</u></p> <p>Lack of knowledge on determining the appropriate width of the riparian area resulting in the action taken for replanting the new oil palm on the buffer zone.</p>
Corrective Actions:	<p><u>Pelantoh Estate:</u></p> <p>Regular refresher training sessions will be conducted to reinforce the significance of the buffer zone to employees, with a particular focus on promoting river sustainability and the buffer zone's importance. The training conducted this time includes not only training materials and training evaluation forms, but also incorporates a quiz to ensure that each employee comprehends the topics discussed and can apply the knowledge provided while performing their tasks.</p> <p><u>Tebak Estate:</u></p> <p>Regular refresher training sessions will be conducted to reinforce the significance of the buffer zone to employees, with a particular focus on promoting river sustainability and the buffer zone's importance. The training conducted this time includes not only training materials and training evaluation forms, but also incorporates a quiz to ensure that each employee comprehends the topics discussed and can apply the knowledge provided while performing their tasks.</p>
Assessment Conclusion:	<p>The on-site verification was conducted on 02/01/2024. The following supporting evidence was thoroughly reviewed during the on-site verification process:</p> <ol style="list-style-type: none"> (1) Sighted the additional marker poles erected along the buffer zones (one in 100 m interval) at MAIDAM Estate, Pelantoh Estate, and Tebak Estate. (2) Sighted training record "Buffer Zone" conducted in Nov 2023 by each estate. Training was conducted by Estate Manager and attended by relevant staffs and workers. <p>During the on-site verification process, it was confirmed that the management had taken the necessary actions to address the identified Major NC. To ensure the effectiveness of the corrective actions, further verification was conducted through interviews with the Estate Manager, Field Staff, sampled workers, and Compliance Executive.</p> <p>Based on the findings from the on-site verification, the review of evidence and documents, as well as the interviews conducted with selected personnel, it can be concluded that the corrective action has been implemented effectively. As a result, the identified Major NC has been successfully addressed and closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Riparian buffer zone was maintained as per management plan. There is signage placed and no activities of chemical sighted there. Training on buffer zone has been conducted for 2024. Thus Major NC was remained closed.</p>

Previous Audit Minor Non-conformity

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NCR Ref #	2412049-202310-N1	Issued Date	26/10/2023
Due Date	Next Audit	Closure Date	26/09/2024
Indicator & Category (Critical / Minor)	1.1.5 (Minor)		
Statement of Nonconformity:	The current list of contact and details of stakeholders and their nominated representatives is not updated.		
Requirement Reference:	There is a current list of contact and details of stakeholders and their nominated representatives.		
Objective Evidence:	<p><u>Location: Tebak Estate</u></p> <p>During the documentation review, it was evident that each operating unit has diligently maintained a comprehensive list of contacts and details for stakeholders and their nominated representatives. This list encompasses various entities, including government agencies, schools, hospitals, vendors/suppliers, contractors, estates, and local community leaders. It was observed that all operating units had updated their respective lists in September 2023. However, a discrepancy was noted at Tebak Estate, specifically in the 'Contractor' column. The estate had listed 17 contractors, but it was revealed that only three of these contractors remain actively engaged by the estate management for plantation activities. The remaining 14 contractors are no longer involved with the estate.</p>		
Corrections:	<p>The list of active stakeholders has been updated to the latest stakeholders until October 2023.</p> <p>Estate had updated new stakeholders list which includes only active parties engaged with the estate. Specifically, in the Contractor columns, the remaining active contractors were only 3 contractors that are still engaged with the estate.</p>		
Root Cause Analysis:	Overlooked by the PIC to monitor the details at the current active stakeholders listing.		
Corrective Actions:	<p>(1) To perform regular checking and monitoring by the PIC to make sure all stakeholder lists are updated.</p> <p>(2) To perform regular refreshment briefing to the PIC regarding to this matter.</p>		
Assessment Conclusion:	During document review, it was noted that current list of contact and details of stakeholders and their nominated representative was updated in the stakeholder list FY2024 at each operating unit. Verified the stakeholder list has been verified to encompass a diverse range, incorporating contractors, vendors/suppliers, relevant authorities such as DOSH/DOE, local schools, community leaders, and other interested parties. Thus Minor NC was effectively closed on 26/09/2024.		

Previous Audit Minor Non-conformity			
NCR Ref #	2412049-202310-N2	Issued Date	26/10/2023
Due Date	Next Audit	Closure Date	26/09/2024
Indicator & Category (Critical / Minor)	2.1.3 (Minor)		

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Statement of Nonconformity:	The demarcation of legal and authorised boundary was not visibly maintained.
Requirement Reference:	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.
Objective Evidence:	<u>Location: MAIDAM Estate</u> At MAIDAM Estate, the demarcation of boundary between the estate and Jengal Forest Reserved was not visibly maintained in accordance with TDM's Agriculture Policy No. 01.02 Survey and Boundary Demarcation. There was one boundary stone identified. However, the stone is located within MAIDAM Estate's planted area (GPS ref.: 4.61527 103.15634). This is also verifiable using the estate's map.
Corrections:	The estate management will cooperate with the Agronomist GPS team to re-identify/resurvey demarcation of boundary between the estate and Jengal Forest Reserved
Root Cause Analysis:	Due to over the time and weathering, the boundary stone become vulnerable to damage or collapse.
Corrective Actions:	(1) Boundary stone should be monitored regularly for sign of damage and repair or replace if possible, according to Agriculture Policy No. 01.02. (2) Always trim the plant that grow and climbing around the boundary stone because it can cause a damage if left unchecked.
Assessment Conclusion:	Based on the site visit, estates was maintained boundary marker. There is no sign of encroachment by both parties in boundary. Training on boundary maintenance has been conducted in 2024. Patrolling was conducted together with HCV checking. Boundary has been maintained in term of the plant grow and road condition. Thus Minor NC was effectively closed on 26/09/2024.

Previous Audit Minor Non-conformity			
NCR Ref #	2412049-202310-N3	Issued Date	26/10/2023
Due Date	Next Audit	Closure Date	26/09/2024
Indicator & Category (Critical / Minor)	2.2.3 (Minor)		
Statement of Nonconformity:	No clauses disallowing child, forced and trafficked labour contain in the contract signed with one of contractor.		
Requirement Reference:	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.		
Objective Evidence:	<u>Location: Air Putih Estate</u> It is standard practice for each estate management of Kemaman POM & Supply Bases to document the basic requirements of the RSPO P&C within a document known as a Surat Perintah Kerja or Syarat-syarat dan Spesifikasi Kerja Kontrak. However, upon reviewing the documents for one of the contractors, specifically the Surat Perintah Kerja No. AP 38/23 dated 01/07/2023, it was observed that there are no clauses disallowing child, forced and trafficked labour contain in this document.		

Corrections:	<p>(1) Employment agreements with all contractors will be updated to comply with the standards.</p> <p>(2) All employment agreements with all contractors will be updated and notified to the contractors involved in order to comply with the clauses disallowing child, forced and trafficked labour contain in the contract before being signed by both parties.</p>
Root Cause Analysis:	As in estate implementation before, employment agreements with contractors which are not supplying human labour, whether harvesters or machine drivers, are exempt from the clause that does not allow children, forced labour and trafficking as they are not directly involved with the supply of human labour.
Corrective Actions:	<p>(1) Establish the Surat Perintah Kerja with all related requirement by RSPO P&C.</p> <p>(2) To perform regular refreshment briefing to the PIC regarding to this matter.</p>
Assessment Conclusion:	<p>Verified sample of Surat Pesanan Kerja for active contractors as below:</p> <ul style="list-style-type: none"> • Koperasi Ladang Sawit Kemaman Sdn Bhd (Gajah Mati Estate & Kemaman POM) • Sesak Maju Enterprise (Tebak Estate) • Serai Kasih Enterprise (Air Putih Estate & Jernih Estate) <p>Each Surat Pesanan Kerja for contractor has updated with additional terms & conditions which highlighted the prohibition of child labor, force labor and labor trafficking commitment.</p> <p>Additionally, in their contract agreement, clause 2 & 3 also stated that no child labor, no forced labor and trafficked labor shall be employed as contractor's workers. Thus Minor NC was effectively closed on 26/09/2024.</p>

Previous Audit Minor Non-conformity			
NCR Ref #	2412049-202310-N4	Issued Date	26/10/2023
Due Date	Next Audit	Closure Date	26/09/2024
Indicator & Category (Critical / Minor)	6.4.1 (Minor)		
Statement of Nonconformity:	The remediation of child labour is not in place.		
Requirement Reference:	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.		
Objective Evidence:	<p><u>Location: Kemaman POM and audited estates</u></p> <p>Each audited operating unit within the Kemaman POM & Supply Bases adheres to the Social Policy and the Protection of Children Policy, both of which were developed by the management of TDMP Sdn. Bhd. These policies have received approval from the Chief Executive Officer of TDMP Sdn. Bhd. on 23-Feb-2023. Through site visits and extensive documentation review, it has been confirmed that each operating unit does not engage in the exploitation of children, including the use of child labor. However, the management has not established any remediation measures in the event of child exploitation cases, even in situations</p>		

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	where such exploitation is not explicitly covered in contracts signed with contractors or service providers.
Corrections:	To update the remediation of child labour in the Social Policy and the Protection of Children Policy accordingly.
Root Cause Analysis:	The updated Social Policy incorporates the previous RSPO standard, with no specific emphasis on the remediation of child labour. This decision was made under the assumption that there is no significant change between the latest and previous standards concerning child labour.
Corrective Actions:	<p>(1) The HQ TDMP will issue a memo and establish SOP regarding to the any remediation measures in the event of child labour issue.</p> <p>(2) To brief and explain to contractors or service providers regarding to the remediation of child labour as to give awareness and understanding for this matter.</p>
Assessment Conclusion:	Document review indicated that TDM Plantation has tighten their child protection commitment by established SOP B14: Child Protection, Rev. Sept 2024, where clause 7.1 stated for response protocol which consist of 3 stages; Immediate Action, Designing a remediation programme and Ongoing support and monitoring. This is as guideline for remediation measures in the event of child exploitation cases found within their compound. The procedure is available and displayed at office notice board for public. There is training conducted for employee, service provider and contractor as per 2024 record. Briefing also being given during annual stakeholder meeting. Thus Minor NC was effectively closed on 26/09/2024.

Previous Audit Minor Non-conformity			
NCR Ref #	2412049-202310-N5	Issued Date	26/10/2023
Due Date	Next Audit	Closure Date	26/09/2024
Indicator & Category (Critical / Minor)	7.3.1 (Minor)		
Statement of Nonconformity:	The implementation of wastes management plan was not satisfactorily demonstrated.		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Objective Evidence:	<p><u>Location: Pelantoh Estate, MAIDAM Estate, and Tebak Estate</u></p> <p>Based on verification through Google Earth, the wastes landfill at Pelantoh Estate (GPS: 4°24'01"N 103°14'10"E), MAIDAM Estate (GPS: 4°38'55"N 103°09'10"E) and Tebak Estate (GPS: 4°26'09"N 103°15'22"E) have residential areas and/or river or waterways within their 3 km radius distance. This is not in-line with the TDM's Domestic Wastes procedure, ver. May 2017, Clause 5.2.2 (b) reads:</p> <ul style="list-style-type: none"> • The landfill shall be located not less than 3 km away from nearest residential, office, or other premises • The landfill shall be located not less than 3 km away from the nearest river or waterway 		
Corrections:	<u>Pelantoh Estate:</u>		

	<p>TDM's Domestic Wastes ver. May 2017 procedure will be revised requires revision to align with the current conditions within the estate.</p> <p><u>MAIDAM Estate:</u> TDM's Domestic Wastes procedure will be revised needs to be revised to align with the current situation at the estates.</p>
Root Cause Analysis:	<p><u>Pelantoh Estate:</u> There is no suitable location for a waste disposal site within the estate, as most of the proposed sites are less than 3 km away from the nearest water source, river source, river, residential areas, and facilities.</p> <p><u>MAIDAM Estate:</u> Current landfill at the estate is the most suitable and strategic due to the topographic factors at the estate which makes it easy for is easily tractors to access and also the location is far away from nearest river or another waterway.</p>
Corrective Actions:	<p><u>Pelantoh Estate:</u> The selection of the waste disposal site will always conform to the new SOP if the old SOP is revised and adjusted to the estate's current circumstances.</p> <p><u>MAIDAM Estate:</u> To ensure if another landfill may be prepared, it must follow the revise SOP criteria in future.</p>
Assessment Conclusion:	<p>Site visit at Landfill found the location was according to their SOP. There is no SW has been disposed as per landfill designed for domestic waste disposal. Interview conducted with PIC found they have good awareness on it. Thus Minor NC was effectively closed on 26/09/2024.</p>

Previous Audit Opportunity for Improvement	
OFI #	Description
Observation (OFI)	<p>2412049-202310-01</p> <p><u>Indicator 3.6.1</u></p> <p>The risk assessment for the work activity involving the transportation of workers to and from the work area could be further enhanced.</p> <p>Verification / Follow-up actions:</p> <p>On-site verification conducted during ASA 2_1 found that the SOP for risk assessment to identify H&S issue documented in the Standard Operating Procedure HIRARC; Edition: TDMP/02; Rev. # TDMP-01/2022; Date: 01/12/2022.</p> <p>The risk assessment process has been described in the SOP accordingly. As per SOP, HIRARC review to be conducted as following:</p> <ul style="list-style-type: none"> - At least once a year - Immediately whenever there is an accident, near miss or dangerous occurrence. - When there are changes in the work method - When new machines and technology are introduced - When there is new activity, process or operations

	Sample HIRARC on work activity involving the transportation of workers to and from the work area verified mitigation plan and control has been implemented effectively.
OFI 1	<p>2412049-202310-I1</p> <p><u>Indicator 3.4.1</u></p> <p>The assessment of the impact arising from the generation and disposal of domestic waste in landfills could be further enhanced.</p> <p>Verification / Follow-up actions:</p> <p>According to the EIA, issues related to the generation and disposal of domestic waste have been documented. The management has been monitoring these matters.</p>
OFI 2	<p>2412049-202310-I2</p> <p><u>Indicator 7.2.1</u></p> <p>The demonstration of the justification for all pesticides used can be further enhanced.</p> <p>Verification / Follow-up actions:</p> <p>TDM Plantation has established the Agrochemical Management Policy dated 1/7/2020 signed by the CEO.</p> <p>The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Standard Operating Procedure A12: Weeding –Immature, A13 – Mature, A14 – Lallang Eradication, rev. 2, May 2017.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2266495-202210-N1	Minor	2.2.2	27/10/2022	Closed out on 26/10/2023
2266495-202210-N2	Minor	3.1.3	27/10/2022	Closed out on 26/10/2023
2412049-202310-M1	Critical	3.8.16	26/10/2023	Closed out on 02/01/2024
2412049-202310-M2	Critical	5.1.6	26/10/2023	Closed out on 02/01/2024
2412049-202310-M3	Critical	6.2.3	26/10/2023	Closed out on 02/01/2024
2412049-202310-M4	Critical	7.8.2	26/10/2023	Closed out on 02/01/2024
2412049-202310-N1	Minor	1.1.5	26/10/2023	Closed on 26/09/2024
2412049-202310-N2	Minor	2.1.3	26/10/2023	Closed on 26/09/2024
2412049-202310-N3	Minor	2.2.3	26/10/2023	Closed on 26/09/2024
2412049-202310-N4	Minor	6.4.1	26/10/2023	Closed on 26/09/2024
2412049-202310-N5	Minor	7.3.1	26/10/2023	Closed on 26/09/2024
2552293-202409-M1	Major	3.6.1	26/09/2024	Closed on 03/11/2024
2552293-202409-M2	Major	GCC 4.1	26/09/2024	Closed on 03/11/2024
2552293-202409-M3	Major	6.2.4	26/09/2024	Closed on 03/11/2024
2552293-202409-N1	Minor	2.2.2	26/09/2024	Open

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3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss TDM Kemaman Palm Oil Mill 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)
Internal, Gender Representative, Worker's Union	Representative of Gender Committee, Representative of workers union	Face to face
Government Agency	Pejabat Rela Daerah Kemaman, Human Resource Department, Dungun, Klinik Ladang Gajah Mati	Phone Call
Local communities	Representative of MPKK Padang Kubu, Bilal Masjid Ladang Tebak, Representative of MPKK Kg. Sg. Mas	Face to face
Contractor/Supplier	Koperasi Ladang Sawit Kemaman Sdn Bhd, Sesak Maju Enterprise	Face to face

Stakeholders comment	
1	Workers Union Representative & Gender Committee Members
	Feedback: The representatives of workers union and gender committee members for both mill and estate stated that the management acknowledged and provide freedom with the establishment of the welfare and gender committee at all unit of certification. Meetings for each organization was conducted regularly and minutes meeting stated that there were discussion on workers right, women's rights, complaint channel and any concern were regularly discussed.
	Audit Team verification and response: No further issue
2	Koperasi Ladang Sawit Kemaman Sdn Bhd, Sesak Maju Enterprise (Contractor)
	Feedback: Contractors confirmed that there is no concerns on payment terms. Both of them were regular attendees in stakeholder consultation and related training conducted by estate and mill. In addition, they

	<p>were also aware on legal regulation including labour and workers employment terms and condition, wages requirement, safety elements and understanding of environment concern.</p> <p>Audit Team verification and response: No further issue</p>
3	<p>Pejabat Rela Daerah Kemaman, Human Resource Department, Dungun, Klinik Ladang Gajah Mati</p> <p>Feedback: All representatives of government agencies acknowledged commitment shown by TDM Plantation especially for Kemaman POM and supply bases for sustainability effort since they were regularly invited to stakeholder consultation session and related concerns.</p> <p>Audit Team verification and response: No further issue</p>
4	<p>Representative of MPKK Padang Kubu, Bilal Masjid Ladang Tebak, Representative of MPKK Kg. Sg. Mas</p> <p>Feedback: In general, it was found that relationship between Kemaman POM and its supply bases with their local communities was satisfactory. Social contribution by TDM Plantation in general has prioritize local employment also appreciated by local communicates which indirectly improve socio-economy of the village area. There are no conflict regards to estate's boundaries with village since it was clearly demarcated with marking, fences, and trenches. Good relationship between both parties is observed with consistent communication and meetings. Villager's representative were invited to external stakeholder session and involved directly upon discussion regards to fire prevention measure accordingly</p> <p>Audit Team verification and response: No further issue</p>

List of land owner / user contacted

Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Kumpulan Ladang-Ladang Terengganu Berhad (Terengganu State Government Incorporated Company)	Current	18,869.67	N/A	N/A	All estates within TDM Kemaman POM Certification Units belongs to the Terengganu State Government Incorporated Company that owns 100% stake in TDM.

Previous land owner / user comment

	<p>Feedbacks: Not applicable since all estates within TDM Kemaman POM Certification Unit belongs to the Terengganu State Government Incorporated Company that owns 100% stake in TDM.</p> <p>Audit Team verification and response: No further verification required.</p>
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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 Kemaman Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Kemaman Palm Oil Mill is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: NOR HALIS ABU ZAR	Name: TN-HJ. SHAHBUDIN BIN USOP
Company Name: BSI SERVICES MALAYSIA SDN BHD	Company Name: Tbm PLANTATION S/B.
Title: CLIENT MANAGER	Title: SENIOR MANAGER, MILL
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 03/11/2024	Date: 06/11/2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>All documents are available at the operating sites and head office. There is no restriction reported by the stakeholders regarding obtaining of information or documents. The access of any relevant documentation is made available upon request. Procedure for communication which includes the information request is available at notice boards of the estates and mill. The company policies is made available at notice boards of the estates and mill vicinity. Available a statement mentioning document readily available to public not limited to:</p> <ul style="list-style-type: none"> • Land ownership title • OSH Plan • SIA Report • EIA Report • HCV report and related documentation • Continuous Improvement Plan • Pollution Prevention Plan • Environmental management/Monitoring Plan • Communication and Complaint/Grievance Procedure 	Complied

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		<ul style="list-style-type: none"> • Consultation Procedure • Human Right Policy • Contributions to community development <p>Based on interview with relevant stakeholder they have good awareness on document that publicly available. Information also being communicated by management during stakeholder meeting dated 28/08/2024.</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Communication Flowchart with Mill/ Estate Management was developed where it has clearly described the process of request of information/ report. Timeline to respond and solve is within 28 working days. The company has implemented Request and Response Form for the stakeholders. Information available in Bahasa Malaysia and English.</p> <p>Annual external stakeholder meetings serve as a platform to share comprehensive information and facilitate effective communication. These meetings, conducted in Bahasa Malaysia, ensure that all stakeholders can engage and understand the discussions.</p> <p>For internal stakeholders, briefings are usually given during morning muster calls, which take place separately at each operating unit. These briefings, conducted by a management representative, focus on delivering critical information. The topics covered include TDM policies, employment contracts, grievance procedures, human rights, the roles of gender committees and trade unions or workers' representatives, along with policies and guidelines like the Sustainable Palm Oil Policy, workplace harassment guidelines, minimum wage standards, and details on RSPO and MSPO certifications.</p>	Complied

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		Based on interview with relevant stakeholder they have good awareness on information provided. Information also being communicated by management during stakeholder meeting dated 28/08/2024.	
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	<p>The company has implemented form for records of Communication with Stakeholders to record all the requests from the stakeholders. These records of information and responses are maintained at respective visited operating units. Logbook used to record any request from stakeholders (internal and external). Most of it mainly on monetary contribution/donation request from neighbouring villages and schools. Other request from government department/agency was by official letter and responded officially by letter to the respective department. Other related information and responses reported in stakeholder meeting which has been carried out by complex/zone on yearly basis. Examples from the logbook include:</p> <ul style="list-style-type: none"> Request of financial aid and event location for "Program Cakna Komuniti" which joint organized by TDM Plantation Sdn Bhd and Local Community. SK Ladang Gajah Mati requested for assistance for traffic controlling during their "Lambaian Merdeka Run" on 21/08/2024 SK Air Puteh request for logistic support for the students to go academic camp, dated 18/08/2024 	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	TDM Plantation Sdn Bhd has established a Standard Operating Procedure (SOP) for Stakeholder Communication, identified as TDMP/02, rev:01/2022, effective from 1/10/2022. This SOP includes a flowchart, "Carta Aliran Pendendalian Isu Social (Stakeholder) (Aduan / Rungutan / Permohonan) / Social Issues Flowchart	Complied

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		<p>(Stakeholders) (Complaint/Application)," found in Appendix 1a. The flowchart outlines the consultation and communication process for handling issues.</p> <p>The procedure specifies that reported issues will be addressed based on the type of communication, with actions typically taken within 28 days. If further action requires approval from the Head Office, the management will submit the request for resolution within 30 working days. All internal and external stakeholders were briefed on this procedure during stakeholder meetings and muster/roll call sessions, which were led by the social liaison officers appointed at each estate and mill. Information also being communicated by management during stakeholder meeting dated 28/08/2024.</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>The current list of contact and details of stakeholders and their nominated representative was updated in the stakeholder list FY2024 at each operating unit. Verified the stakeholder list has been verified to encompass a diverse range, incorporating vendors/suppliers, relevant authorities such as DOSH/DOE, local schools, community leaders, and other interested parties.</p>	Complied
Criterion 1.2: 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>The management has implemented key policies to promote ethical conduct and ensure consistent adoption and enforcement across all operating units. These policies include:</p> <ul style="list-style-type: none"> • Work Ethical Policy, endorsed and signed on 23/02/2023 that establishes clear guidelines for ethical conduct within the organization. • Anti-Bribery and Corruption Policy, Ref. No. TDMB/CISD/1220/ABC, Version 2.0, dated 07/12/2020 which 	Complied

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		<p>outlines the TDMB Group's firm stance against bribery and corruption in all forms.</p> <ul style="list-style-type: none">• No Gift” Policy, Ref. No/ TDMB/CISD/1220/”NO GIFT, Version 2.0, dated 07/12/2020) which aims to prevent actual or perceived conflicts of interest in business dealings, demonstrating the company’s commitment to the highest standards of ethics and integrity. <p>It was noted that regular briefing regards to policies and SOP has been conducted annually to internal and external stakeholders as table below:</p> <table><tr><th>Estate</th><th>Internal Stakeholder</th><th>External Stakeholder</th></tr><tr><td>Gajah Mati Estate</td><td>20/08/2024</td><td rowspan="5">28/08/2024</td></tr><tr><td>Kemaman POM</td><td>13/06/2024</td></tr><tr><td>Air Putih Estate</td><td>15/04/2024</td></tr><tr><td>Tebak Estate</td><td>12/05/2024</td></tr><tr><td>Jernih Estate</td><td>19/08/2024</td></tr></table> <p>This ensures that both internal and external stakeholders including contractors are fully informed and aligned with the ethical standards established by the organization.</p>	Estate	Internal Stakeholder	External Stakeholder	Gajah Mati Estate	20/08/2024	28/08/2024	Kemaman POM	13/06/2024	Air Putih Estate	15/04/2024	Tebak Estate	12/05/2024	Jernih Estate	19/08/2024	
Estate	Internal Stakeholder	External Stakeholder															
Gajah Mati Estate	20/08/2024	28/08/2024															
Kemaman POM	13/06/2024																
Air Putih Estate	15/04/2024																
Tebak Estate	12/05/2024																
Jernih Estate	19/08/2024																
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>In order to ensure effective implementation of policies, an internal audit program has been established, encompassing aspects related to Environment, Safety, and Health (ESH), the Roundtable on Sustainable Palm Oil (RSPO), and Environmental, Social, and</p>	Complied														

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		<p>Governance (ESG) criteria. Additionally, the due diligence declarations of suppliers and contractors are incorporated into this program. This is to monitor and evaluate the organization's adherence to its policies and its overall commitment to ethical business practices. The internal audit program acts as a comprehensive tool for verifying and sustaining compliance across various domains, thereby fostering a culture of ethical conduct within the organization. Details of monitoring program involved as table below:</p> <table><tr><th>Estate</th><th>Sustainability Internal Audit</th><th>Asset Verification (Stock Take)</th></tr><tr><td>Gajah Mati Estate</td><td>10/06/2024</td><td>30/12/2023</td></tr><tr><td>Kemaman POM</td><td>04/08/2024</td><td>01/01/2024</td></tr><tr><td>Air Putih Estate</td><td>07/08/2024</td><td>31/12/2023</td></tr><tr><td>Tebak Estate</td><td>11/08/2024</td><td>31/12/2023</td></tr><tr><td>Jernih Estate</td><td>14/08/2024</td><td>31/12/2023</td></tr></table>	Estate	Sustainability Internal Audit	Asset Verification (Stock Take)	Gajah Mati Estate	10/06/2024	30/12/2023	Kemaman POM	04/08/2024	01/01/2024	Air Putih Estate	07/08/2024	31/12/2023	Tebak Estate	11/08/2024	31/12/2023	Jernih Estate	14/08/2024	31/12/2023	
Estate	Sustainability Internal Audit	Asset Verification (Stock Take)																			
Gajah Mati Estate	10/06/2024	30/12/2023																			
Kemaman POM	04/08/2024	01/01/2024																			
Air Putih Estate	07/08/2024	31/12/2023																			
Tebak Estate	11/08/2024	31/12/2023																			
Jernih Estate	14/08/2024	31/12/2023																			
Principle 2: Operate legally and respect rights																					
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.																					
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	TDM Kemaman 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:	Complied																		

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		<p>Gajah Mati Estate</p> <ol style="list-style-type: none"> 1. MPOB Licence #502036302000 valid from 01/09/2024 until 31/08/2025 2. Nursery Licence #562823011000 valid from 01/07/2024 until 30/06/2025 3. Weighbridge calibration @B694200 inspected by De Metrology dated 11/03/2024 4. Diesel permit #T000129 valid until 02/11/2024 5. Air Receiver #TG PMT 4867 valid until 10/12/2025 6. Water Abstraction Licence #PA(P)-A0043 valid until 31/12/2024 <p>Kemaman POM</p> <ol style="list-style-type: none"> 1. MPOB Licence #500041904000 valid from 01/04/2024 until 31/03/2025 2. DOE Licence #005944 valid from 01/07/2024 until 30/06/2025 3. Weighbridge calibration #B1956041 inspected by De Metrology dated 19/06/2024 4. Diesel permit #T001757 valid from 11/05/2024 until 10/05/2027 5. Competence person #AGT297499-23 to Assistant Manager NRIC 880614-XX-XXXX 6. Back Pressure Vessel #TG PMT 107391 valid until 15/08/2025 7. Air Receiver #TG PMT 81764 valid until 15/08/2025 8. Pressure Filter #TG PMT 70470 valid until 15/08/2025 	
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		<p>9. Competence person of CePSWaM was Compliance Exec NRIC 850123-XX-XXXX dated 15/01/2024. FTR has been submitted and waiting for approval as per email by DOE dated 14/03/2024.</p> <p>10. Competence person of CePomme was Assistant Manager however the Assistant Manager has been resigned on 10/2023. New person in charge has been assigned as per email dated 14/05/2024 for Training which is Assistant manager NRIC 720910-XX-XXXX</p> <p>Air Putih Estate</p> <ol style="list-style-type: none"> 1. MPOB Licence #503558102000 valid from 01/08/2024 until 31/07/2025 2. Horizontal Air Receiver #TG PMT 6986 valid until 27/02/2025 3. Horizontal Air Receiver Tank #TG PMT 5473 valid until 27/02/2025 4. Water Abstraction Licence #PA(P)-A0075 valid until 31/12/2024 5. Diesel permit #T00186 valid until 15/11/2024 <p>Tebak Estate</p> <ol style="list-style-type: none"> 1. MPOB Licence #620743002000 valid from 01/01/2024 until 31/12/2024 2. Air Receiver #TG PMT1292 valid until 09/09/2025 3. Diesel permit #T001782 valid until 22/06/2027 <p>Tebak Estate</p> <ol style="list-style-type: none"> 1. MPOB Licence #501868702000 valid from 01/11/2023 until 31/10/2024 	
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		<p>2. Diesel permit #T000071 valid from 15/08/2024 until 14/08/2027</p> <p>3. Air Receiver #TG PMT 1251 valid until 09/09/2025</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Legal and Other Requirements (LOR) (TDM/Estate/01) Revision 00/2021 dated 01/01/2021. The purpose is to ensure the estate is aware with current legal and other requirements that relevant to their operation. Established and documented Estate Legal Requirements Register 2024 (Edition 2024), last reviewed & updated 15/07/2024. A legal register listed additional applicable laws, including:</p> <ul style="list-style-type: none"> • Minimum Wages Order 2022 • Fire Service Act 1988 (Act 341) Amendment 2020 • Human Resources Development Act 2001 • Anti-Sexual Harassment Act 2021 • Employees' Social Security (Amendment) Act 2022 • Employees' Insurance System (EIS) (Amendment) Act 2022 • Control of Supplies Act 1961 • Employment (Amendment) Act 2022 • OSHA (Construction Work) (Design & Management) Regulation 2024 <p>The mill and estates has appointed the Compliance Executive as person responsible for compliance legal and other requirement as per appointment letter signed by the Manager.</p>	Complied

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2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the sampled estates, during the field inspection confirmed that they were clearly marked and maintained. Trenches were constructed at most areas.</p> <p>Gajah Mati Estate</p> <p>Sighted boundary at P2017B neighbouring with Kampung Perak. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p>Air Putih Estate</p> <p>Sighted boundary at P2011 boundary with Reserve Forest. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p>Tebak Estate</p> <p>Sighted boundary at P2013A2 neighbouring with RISDA. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p>Jernih Estate</p> <p>Sighted boundary at PM05A/1T neighbouring with Smallholders. Verified that there is no planting beyond these legal or authorised boundaries.</p>	Complied
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>List of contracted parties were made available for verification at visited operating units and incorporated in FY2024 stakeholder list.</p>	Complied

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		The information in the stakeholder lists includes name and addresses of contractors, their contact person and contact numbers.																					
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Verified that specific clauses on meeting applicable legal requirements have been 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 were made available. For each month, contractors are required to provide all related pay documents (SOCSO, EPF and payslip) to demonstrate compliance with legal requirements. This was sighted in document signed with the following contractors:</p> <table><tr><th>Estate</th><th>Contractor</th><th>Job</th></tr><tr><td rowspan="2">Gajah Mati Estate</td><td>J A Warisan Mekar Enterprise</td><td>FFB Transportation</td></tr><tr><td>Nantha Agency</td><td>FFB Transportation</td></tr><tr><td rowspan="3">Kemaman POM</td><td>Sutera Adela Sdn Bhd</td><td>CPO Transporter</td></tr><tr><td>MNAN Resources Sdn Bhd</td><td>CPO & PK Transporter</td></tr><tr><td>Sidhu Brothers Transport Sdn Bhd</td><td>CPO & PK Transporter</td></tr><tr><td rowspan="2">Air Putih Estate</td><td>Sudi Segar Maju Enterprise</td><td>Backhoe Rental</td></tr><tr><td>WJ Paya Enterprise</td><td>Tractor Rental</td></tr></table>	Estate	Contractor	Job	Gajah Mati Estate	J A Warisan Mekar Enterprise	FFB Transportation	Nantha Agency	FFB Transportation	Kemaman POM	Sutera Adela Sdn Bhd	CPO Transporter	MNAN Resources Sdn Bhd	CPO & PK Transporter	Sidhu Brothers Transport Sdn Bhd	CPO & PK Transporter	Air Putih Estate	Sudi Segar Maju Enterprise	Backhoe Rental	WJ Paya Enterprise	Tractor Rental	Non-compliance
Estate	Contractor	Job																					
Gajah Mati Estate	J A Warisan Mekar Enterprise	FFB Transportation																					
	Nantha Agency	FFB Transportation																					
Kemaman POM	Sutera Adela Sdn Bhd	CPO Transporter																					
	MNAN Resources Sdn Bhd	CPO & PK Transporter																					
	Sidhu Brothers Transport Sdn Bhd	CPO & PK Transporter																					
Air Putih Estate	Sudi Segar Maju Enterprise	Backhoe Rental																					
	WJ Paya Enterprise	Tractor Rental																					

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			Kima Wawasan Entreprise	Excavator Rental	
		Tebak Estate	S Bharthraja Enterprise	Harvesting Activites	
			Sesak Maju enterprise	Backhoe Rental	
		Jernih Estate	S Bharthraja Enterprise	Harvesting Activities	
			Serai Kasih Enterprise	Pruning Activities	
		However, it was verified via documents review and interview session, findings as below was noted.			
<u>Kemaman POM</u>					
Sutera Adela Enterprise is a contractor appointed by the mill to transport CPO and PK to the buyer from 01/01/2024 to 31/12/2025. Based on an interview with the person in charge and a review of the documents, it was found that the contractor was unable to provide the MPOB license as legal compliance evidence for CPO transportation. This is in contradiction to the Malaysian Palm Oil Board Act 1998, Section 3(1), which states that no person shall carry out activities such as producing, processing, or transporting palm oil and its products without obtaining a valid MPOB license.					
<u>Tebak Estate</u>					
A machine rental contractor was appointed at the estate for road and trench maintenance activities. Upon reviewing the due diligence					

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		<p>documents, it was noted that the contractor was unable to provide evidence of machinery insurance as required by the term and condition in agreed contract agreement under Clause 6, which states that the operator and machinery used must have insurance coverage to protect workers and machinery in the event of an accident or death during the execution of the work. Details contractor involved as below:</p> <table><tr><th>Contractor</th><th>Job Description</th><th>Validity of Agreement</th></tr><tr><td rowspan="2">Koperasi Ladang Sawit kemaman Terengganu Sdn Bhd</td><td>Bulldozer Rental</td><td>01/08/2024 - 31/10/2024</td></tr><tr><td>Excavator Rental</td><td>01/08/2024- 31/10/2024</td></tr></table> <p><u>Air Putih Estate</u></p> <p>Serai Kasih Enterprise is a contractor engaged by estate to carry out harvesting work. Reviewed the sampled payslips, SOCSO Contribution Form 8A of contractors for the month of July 2024, found that the SOCSO contribution made was not in accordance with Employees’ Social Security Act 1969 (Act 4).</p> <p>The details are as below:</p>	Contractor	Job Description	Validity of Agreement	Koperasi Ladang Sawit kemaman Terengganu Sdn Bhd	Bulldozer Rental	01/08/2024 - 31/10/2024	Excavator Rental	01/08/2024- 31/10/2024	
Contractor	Job Description	Validity of Agreement									
Koperasi Ladang Sawit kemaman Terengganu Sdn Bhd	Bulldozer Rental	01/08/2024 - 31/10/2024									
	Excavator Rental	01/08/2024- 31/10/2024									

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		<table><tr><th>Workers Passport No.</th><th>Gross Salary</th><th>SOC SO Contribution in Workers' Payslip</th><th>SOC SO Contribution Form 8A from the contractor</th><th>Total Rate of contribution as per Employees ' Social Security Act 1969 (Act 4)</th></tr><tr><td>E0182XXX</td><td>RM3,067.99</td><td>RM32.60</td><td>RM32.60</td><td>RM68.60</td></tr><tr><td>E6874XXX</td><td>RM3,067.99</td><td>RM32.60</td><td>RM32.60</td><td>RM68.60</td></tr><tr><td>E4935XXX</td><td>RM3,067.99</td><td>RM32.60</td><td>RM32.60</td><td>RM68.60</td></tr></table> <p>Therefore, non-conformity is raised.</p>	Workers Passport No.	Gross Salary	SOC SO Contribution in Workers' Payslip	SOC SO Contribution Form 8A from the contractor	Total Rate of contribution as per Employees ' Social Security Act 1969 (Act 4)	E0182XXX	RM3,067.99	RM32.60	RM32.60	RM68.60	E6874XXX	RM3,067.99	RM32.60	RM32.60	RM68.60	E4935XXX	RM3,067.99	RM32.60	RM32.60	RM68.60	
Workers Passport No.	Gross Salary	SOC SO Contribution in Workers' Payslip	SOC SO Contribution Form 8A from the contractor	Total Rate of contribution as per Employees ' Social Security Act 1969 (Act 4)																			
E0182XXX	RM3,067.99	RM32.60	RM32.60	RM68.60																			
E6874XXX	RM3,067.99	RM32.60	RM32.60	RM68.60																			
E4935XXX	RM3,067.99	RM32.60	RM32.60	RM68.60																			
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>Verified that specific clauses disallowing child, forced and trafficked labour have been 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 were made available as sighted in "Surat Pesanan Kerja" for each appointed contractor in table below.</p> <table><tr><th>Estate</th><th>Contractor</th><th>Job</th></tr></table>	Estate	Contractor	Job	Complied																	
Estate	Contractor	Job																					

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		Gajah Mati Estate	J A Warisan Mekar Enterprise	FFB Transportation	
			Nantha Agency	FFB Transportation	
		Kemaman POM	Mekar Angkut Sdn Bhd	CPO Transporter	
			Koperasi Ladang kelapa Sawit Kemaman Terengganu Berhad	CPO & PK Transporter	
			Sidhu Brothers Transport Sdn Bhd	CPO & PK Transporter	
		Air Putih Estate	Sudi Segar Maju Enterprise	Backhoe Rental	
			WJ Paya Enterprise	Tractor Rental	
			Kima Wawasan Enterprise	Excavator Rental	
		Tebak Estate	S Bharthraja Enterprise	Harvesting Activities	
			Sesak Maju enterprise	Backhoe Rental	
		Jernih Estate	S Bharthraja Enterprise	Harvesting Activities	

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			Serai Kasih Enterprise	Pruning Activities	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.					
2.3.1	(C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none">Information on geo-location of FFB originsEvidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholderOne or more supporting documents for claimsValid MPOB license - Critical (Major) compliance -	The mill only received FFB from RSPO certified plantations. For directly sources FFB, the mill maintained the information such as a valid copy of RSPO Certificate, MPOB license and summary of land title. The mill received RSPO certified FFB from sister estates and from one RSPO certified outside FFB supplier i.e. Tabung Tentera Terengganu Estate which was last supplied the FFB to Kemaman POM in early 2023. Notwithstanding, the mill still maintained the information as verified the details as following: <ul style="list-style-type: none">Geolocation: 4° 12’ 10’’ N, 103° 13’ 59’’ ERSPO Certificate no.: RSPO-PC 00121MPOB License: 504807102000			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 Indicator2.3.1. - Minor compliance -	The mill received RSPO certified FFB from sister estates and from one RSPO certified outside FFB supplier i.e. Tabung Tentera Terengganu Estate.			Complied
Principle 3: Optimise productivity, efficiency, positive impacts and resilience					
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.					
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	The business plan for the mill is reflected in the form of an annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.			Complied

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	<p>- Critical (Major) compliance -</p>	<p>The business or management plan for the estates were presented in the form of annual budget with 5 years projection (2024 – 2028). The annual budget contains the crop projection and the finance allocation for field operation and administration. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p> <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. In the 5 years business plan include items as follows:</p> <ul style="list-style-type: none"> a) Palm oil mill <ul style="list-style-type: none"> i. Mill intake – FFB input ii. Production of CPO iii. Production of PK iv. Total Palm Oil Extraction v. Total Palm Kernel Extraction vi. Mill cost b) Oil Palm Estate <ul style="list-style-type: none"> i. Total crop projection and yield potential ii. Activity direct cost <ul style="list-style-type: none"> a. Mature upkeep b. Manuring c. Harvesting and collection d. Transportation 	
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		<div>e. Nursery</div> <div>iii. Estate administration</div> <div>a. Admin Cost</div> <div>iv. Labour overhead</div> <div>v. Road and bridges</div> <div>vi. Cost of production.</div> <div>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2028) and well documented upon request.</div>																															
3.1.2	<div>An annual replanting programme projected for a minimum of five years with yearly review, is available.</div> <div>- Minor compliance -</div>	<div>TDM Kemaman POM Certification Unit has established a long-range replanting programme until FY 2028. Replanting is planned for the fields older than 25 years, non-performance fields (yield) and Ganoderma infected palms. The total Ha for the projected replanting of sampled Estate are as follows:</div> <table><tr><td>Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Gajah Mati</td><td>110.11</td><td>319.98</td><td>222.98</td><td>0.00</td><td>0.00</td></tr><tr><td>Air Putih</td><td>0.00</td><td>167.46</td><td>211.94</td><td>186.43</td><td>251.24</td></tr><tr><td>Tebak</td><td>0.00</td><td>252.62</td><td>238.45</td><td>338.50</td><td>264.82</td></tr><tr><td>Jernih</td><td>0.00</td><td>0.00</td><td>186.28</td><td>179.76</td><td>0.00</td></tr></table>	Estate	2024	2025	2026	2027	2028	Gajah Mati	110.11	319.98	222.98	0.00	0.00	Air Putih	0.00	167.46	211.94	186.43	251.24	Tebak	0.00	252.62	238.45	338.50	264.82	Jernih	0.00	0.00	186.28	179.76	0.00	Complied
Estate	2024	2025	2026	2027	2028																												
Gajah Mati	110.11	319.98	222.98	0.00	0.00																												
Air Putih	0.00	167.46	211.94	186.43	251.24																												
Tebak	0.00	252.62	238.45	338.50	264.82																												
Jernih	0.00	0.00	186.28	179.76	0.00																												
3.1.3	<div>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</div> <div>- Minor compliance -</div>	<div>TDM Kemaman POM Certification Unit held management reviews at 08/09/2024 on a yearly basis. Among the matters discussed during the management review are as follows: -</div>	Complied																														

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		<div><div><div>1. Introduction by Chairman</div><div>2. Results of Internal Audits covering RSPO & MSPO</div><div>3. Customer feedback</div><div>4. Status up preventive and corrective actions</div><div>5. Follow up actions from management review</div><div>6. Changes that could affect the management system</div><div>7. Recommendations for improvement</div><div>8. Improvement of the effectiveness of the management system and process</div><div>9. Resources need</div></div><div>The minutes of the meeting indicated that Internal audit findings were each thoroughly examined, and the corrective action plan were discussed.</div></div>					
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	<div><div><div>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</div><div>- Critical (Major) compliance -</div></div></div>	<div><div><div>The estates and the mill had stated their intentions towards continuous improvement through the following action. The plans were similar and monitored through the regional compilation.</div><table><tr><td>Impacts/Opportunities</td><td>Action Plan</td></tr><tr><td>Estates: Enhancement of beneficial plant for the IPM management</td><td>To develop beneficial plant nursery - Turnera subulata, Cassia cobanensis, Antigonon leptopus</td></tr></table></div></div>	Impacts/Opportunities	Action Plan	Estates: Enhancement of beneficial plant for the IPM management	To develop beneficial plant nursery - Turnera subulata, Cassia cobanensis, Antigonon leptopus	Complied
Impacts/Opportunities	Action Plan						
Estates: Enhancement of beneficial plant for the IPM management	To develop beneficial plant nursery - Turnera subulata, Cassia cobanensis, Antigonon leptopus						

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		Estates: Enhancement of HCV /biodiversity management	Education and awareness program to train the SOU biodiversity, flora/fauna and about biodiversity management.	
			Installation Project of Elephant Encroachment Laser Sensor	
		Estates: Enhancement of facilities - rainwater harvest	Implementation of rain harvest for cleaning and general upkeep purposes.	
		Estates: Workplace facilities	Upgrading of tractor washing	
		Estates: Mechanization	- FFB evacuation using grabber & Mechanical Buffalo - Use of Mechanical Palm Cut	
		Estates: Precision Farming	Drone equipment adoption in the monitoring of area.	
		Mill: GHG emission	Biogas plant – gas engine vs flaring	
		Mill: Dust/particulate emission	Electrostatic Precipitator (ESP) operation efficiency	
		Mill: Steam efficiency	Post heater cooker - improved sterilization	
		Estate & Mill: Unsafe Condition, Unsafe Act (UCUA) Box	UCUA box installation in office area	

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		Estate & Mill: Lost Time Injury (LTI) sign "installation"	LTI sign installation in office area	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The reporting for the economic, social, and environmental metrics of the TDM Kemaman POM Certification Unit utilizes the RSPO metric template Version 2.1 (updated June 2021). All information filled in the template accurately reflects each operating unit of the Unit of Certification (UoC).</p> <p>Furthermore, the Annual Communication of Progress (ACOP) reporting for the year 2023 of TDM Kemaman POM has been submitted to the RSPO Secretariat. Additionally, the PalmGHG data for this UoC has been submitted to the BSI Assessment Team prior to the audit and was approved after onsite verification by the CB using PalmGHG Version 4.</p>		Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.				
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The estate operations are governed by TDM's Agriculture Policy, which outlines various procedures in the manual, including:</p> <ul style="list-style-type: none"> • AP1: Land Preparation • AP2: Oil Palm Nursery • AP3: Planting and Replanting • AP4: Agronomic Practices • AP5: Manuring • AP6: Weed Management • AP7: Harvesting and Crop Evacuation 		Complied

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		<ul style="list-style-type: none">• AP8: Pest and Disease Management• AP9: Water and Soil Conservation <p>These agricultural policies (APs) are updated periodically to align with current needs.</p> <p>Kemaman POM</p> <p>The mill has documented its operational procedures in a multi-level system, covering processes from the reception of Fresh Fruit Bunches (FFB) to the dispatch of Crude Palm Oil (CPO) and Palm Kernel (PK). A list of Standard Operating Procedures (SOPs) has been established and documented for mill operations, totaling 30 SOPs, each with a noted latest revision date. Some examples include:</p> <ul style="list-style-type: none">• SOP for Safety and Health Committee (Rev. date: Nov 2016)• SOP for EFB Press Station (Rev. date: Jan 2015)• SOP for Permit to Work (Rev. date: Nov 2020)• SOP for Scheduled Waste Handling (Rev. date: Nov 2021)• SOP SCCS Internal Audit (Rev. date: Jan 2022)					
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The Agronomy and Advisory Department, Sustainability Unit, Plantation Controller and relevant Head Office personnel including the CEO inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Other mechanism as described below.</p> <table><tr><td>Areas</td><td>Action/Activities</td></tr><tr><td>Estates: Daily</td><td>Supervision by field staff/Assist/Manager</td></tr></table>	Areas	Action/Activities	Estates: Daily	Supervision by field staff/Assist/Manager	Complied
Areas	Action/Activities						
Estates: Daily	Supervision by field staff/Assist/Manager						

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			Report of daily activities/costings/variation	
		Estates: Schedule	Quarterly ESH meeting	
			Internal audits by Sustainability Department	
			Annual EPMC	
			External audit RSPO /MSPO	
			Agronomist visits	
			Plantation Controller visits	
		Estates: Medical /health	Monthly medical check-up by HA/MA	
			Annual medical surveillance.	
		Mill: Daily	Supervision by staff/Assist/Manager	
			Report of daily activities/costings/variation	
		Mill: Schedule	Quarterly ESH meeting	
			Internal audits by Sustainability Department	
			External audit RSPO /MSPO	
			Head of Mill Services visit.	
		Mill: Annual	Annual EPMC	
			Medical surveillance	
		Mill: Periodical (15 months)	DOSH mill inspection	
		Latest internal audit conducted by Sustainability personnel dated on 4-8 August 2024.		

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3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Operating units visited maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. The Plantation Controller (PC) are accountable to monitor the estates compliance towards the SOP, Budget and Productivity among others. Estates / Mill performances are reviewed during the monthly meeting with PC/CEO.	Complied
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	Confirmed that there is no new planting or introduction of new method/operations in estates and mill under Kemaman POM certification Unit. However, it was noted that TDM Plantation has conducted Social Impact Assessment for for Bukit Besi Complex which done by external consultant called Green Orbis Environment Sdn Bhd from 12/06/2022 to 15/06/2022. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. The report includes both positive and negative impact and its recommendation For the year 2024, an Environmental Impact Identification (EAI) and Environmental Impact Evaluation (EIE) was established to identify environmental aspects in all estate activities including the mill. This assessment was documented using Environmental Aspects Impacts Identification and Environmental Impacts Evaluation forms, covering all activities in the estates and mill. The	Complied

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		<p>EIA was conducted in accordance with established Standard Operating Procedures (SOP). Sample of activity verified were:</p> <p>Estates</p> <ol style="list-style-type: none"> 1. Grass cutting 2. Parking vehicle 3. Herbicide spraying 4. Maintenance station 5. Store cleaning <p>Mill</p> <ol style="list-style-type: none"> 1. Steriliser 2. Boiler 3. Laboratory 4. EFB dumpsite 5. Final discharge <p>The monitoring on the impact of mill and estates activities has been verified and found in order.</p> <p>Sample verification of Generation and disposal of waste being discussed in the EIA. Management has monitored the performance and verification found in order.</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>A social management plan entitled SIA Management Plan 2024 has been developed by each operating unit and confirmed that it was developed with participation of affected stakeholders based on attendance during stakeholder meeting, OSH meeting, gender committee meeting, workers meeting, and complaint book. It</p>	Complied

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		<p>includes social impacts, area of concern, person-in-charge (PIC), the plan's timeframe, and the status of resolution. 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.</p> <p>Example of the plan are as follows:</p> <ol style="list-style-type: none">1. Issue: No proper communication between employer and employee for the complaint procedure Action: All complaints shall be recorded in proper form following the SOP- flowchart of grievances/complaint.2. Issue: Open more job opportunities to local people Action: Estate management to advertise and prioritize local people for employment <p>SIA management plan sighted has been updated as the following:</p> <table><tr><th>Estate/Mill</th><th>Date of review</th></tr><tr><td>Gajah Mati Estate</td><td>15/04/2024</td></tr><tr><td>Kemaman POM</td><td>10/02/2024</td></tr><tr><td>Air Putih Estate</td><td>01/04/2024</td></tr><tr><td>Tebak Estate</td><td>23/07/2024</td></tr><tr><td>Jernih Estate</td><td>27/05/2024</td></tr></table>	Estate/Mill	Date of review	Gajah Mati Estate	15/04/2024	Kemaman POM	10/02/2024	Air Putih Estate	01/04/2024	Tebak Estate	23/07/2024	Jernih Estate	27/05/2024	
Estate/Mill	Date of review														
Gajah Mati Estate	15/04/2024														
Kemaman POM	10/02/2024														
Air Putih Estate	01/04/2024														
Tebak Estate	23/07/2024														
Jernih Estate	27/05/2024														

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		<p>The EAI and EIE, along with its management and monitoring plan, were continuously reviewed and updated with the participation of affected stakeholders, both internal among employees and external stakeholders, with the latest external stakeholder consultation meeting.</p> <p>The assessment identified various impacts related to compliance with legal requirements, workers' welfare, handling of complaints and grievances, and socio-economic impacts on surrounding communities.</p> <p>The management already establish the environmental management plan for Mill / Estate base on EIA and EIE and also department of environment requirement (<i>Jadual Pematuhan</i>). The plan for environmental as per below:</p> <table><tr><th>Management Plan</th><th>Action Plan</th></tr><tr><td>Reduce water consumption by maximizng rainfall sorces</td><td>Rainwater that is stored using "Pasung Hujan" installed around the workshop is reused</td></tr><tr><td>Prevent soil erosion in cliff area and terrace area</td><td>Leguminous cover crops such as Mucuna bracteate, Colopogonium caeruleum or Pueraria javanica plantedduring replantinmg activities</td></tr><tr><td>Prevent chemical substance from entering surrounding /drainage</td><td>Prepare chemical mixing in designated areas before spraying work carried out</td></tr></table>	Management Plan	Action Plan	Reduce water consumption by maximizng rainfall sorces	Rainwater that is stored using "Pasung Hujan" installed around the workshop is reused	Prevent soil erosion in cliff area and terrace area	Leguminous cover crops such as Mucuna bracteate, Colopogonium caeruleum or Pueraria javanica plantedduring replantinmg activities	Prevent chemical substance from entering surrounding /drainage	Prepare chemical mixing in designated areas before spraying work carried out	
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		<div>Prevention of excessive diesel or lubricant spillage during operation</div> <div>Regular schedule cleaning to ensure leakage is manageable if any and to avoid further land and water pollution</div>	
		<div>Manage fuel consumption of water pump engine by operation monitoring</div> <div>Ensure engine to be started only when operating and to shut down immediately when stop operating</div>	
		This has been monitored by the management unit with PIC, timeframe and the status of implementation.	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The social management plan was available for each unit with information such as area of concern, person-in-charge (PIC), the plan's timeframe, and the status of resolution. The inputs are gathered from the meeting minutes of:</p> <ul style="list-style-type: none"> • Annual External Stakeholder Meeting • Gender Committee, • Annual Workers Committee Meeting • Safety Meeting • Complaint & Request from internal & external stakeholders and muster briefing <p>Verification indicates that all issues identified in the social impact assessment and management plan have been addressed, reviewed, and updated regularly in a participatory way as confirmed via thorough document review and interview session with external stakeholders.</p>	Complied

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		<p>Social and Environmental Action Plans are available for each operating unit, containing comprehensive information on identified issues, management plans, Persons in Charge (PIC), and time frames for implementation. The input for these plans is gathered from various sources, including meeting minutes from:</p> <ul style="list-style-type: none">• Gender Committee and NUPW meetings,• Safety Meetings,• Complaints and requests from internal and external stakeholders, as well as muster briefings, and• Stakeholders' meetings. <p>These action plans serve as proactive measures to address social and environmental concerns identified through stakeholder engagement and internal discussions, ensuring timely and effective implementation of mitigation strategies.</p> <ol style="list-style-type: none">1. Environmental management plan2. Waste Management Plan3. Pollution Prevention Plan4. Water Management Plan5. IPM Management Plan <p>Social Management Plan and Environment Management Plan monitoring plan was implemented, reviewed and updated regularly in a participatory way. Refer Plan for the year of 2024. The table included the time frame, and person in charge for each matters.</p>	
Criterion 3.5: A system for managing human resources is in place.			

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3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The recruitment of local workers for both the mill and estates is outlined in the SOP titled "Prosedur Perlantikan Pekerja Ladang and Kilang" (TDMP/SMP/3/01.01), dated 02/11/2016. This procedure details the recruitment, selection, and hiring processes, including candidate vetting, interviews, and medical fitness assessments. On the other hand, opportunity for career promotions is based on requirements and evaluation of the Company. In conclusive, all terms and conditions in the procedure are in accordance with the terms of the employment contract and the Employment Act 1955.</p> <p>While for foreign workers, the procedure was documented as "Recruitment Procedure (Foreign Workers)" (SOP/OD/REV00) dated 01/03/2019 where highlighting process of recruitment includes conducting interviews and selecting candidates based on factors such as age, qualifications, and agricultural experience via recruitment agencies appointed by headquarters.</p> <p>During interview session, sample of workers claimed that they aware regards to the procedure accordingly.</p>	Complied
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 documentation review, it was found that employment procedures as mentioned in indicator 3.5.1 were implemented and all records are adequately maintained. Induction process is mandatory to be carried out by operating unit to ensure company's rules and regulations were socialized and acknowledged by the workers.</p> <p>Induction briefing, fill out application form, medical checkup, interview session, briefing on salary, employment terms and conditions, as well as information about grievance channel were conducted as per required in the procedures established. This was confirmed during interview with sampled workers comprising both of foreign workers from different origin countries and local workers.</p>	Complied

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		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.	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantations has established the SOP for risk assessment to identify H&S issue documented in the Standard Operating Procedure HIRARC; Edition: TDMP/02; Rev. # TDMP-01/2022; Date: 01/12/2022.</p> <p>The risk assessment process has been described in the SOP accordingly. As per SOP, HIRARC review to be conducted as following:</p> <ul style="list-style-type: none"> - At least once a year - Immediately whenever there is an accident, near miss or dangerous occurrence. - When there are changes in the work method - When new machines and technology are introduced - When there is new activity, process or operations. <p>Gajah Mati Estate</p> <p>Latest OSH Plan documented as OSH Plan, Training Matrix & Training Schedule 2024 which included relevant task, activities and training as per documented OSH Legal compliance review; Date: 24/06/2024, Emergency response plan drill; Date: 23/04/2024, HIRARC annual review; Date: 01/05/2024.</p> <p>Kemaman POM</p>	Non-compliance

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		<p>The mill has established HIRARC Team lead by the Mill Manager. The team reviewed the HIRARC as per SOP HIRARC; Rev. # TDMP-01/2022; Date: 01/12/2022 established. HIRARC review was approved and documented on 28/07/2024 due to accident in kernel station on 17/07/2024.</p> <p>Air Putih Estate</p> <p>The estate has established HIRARC Team lead by the Estate Manager. The team reviewed the HIRARC as per SOP established. FY 2024, the annual HIRARC review was conducted on 19/1/2024 with no changes in the HIRARC register. Latest HIRARC review due to accident occurrence was conducted on 17/07/2024 for travelling activities to and from work sites.</p> <p>Tebak Estate</p> <p>Tebak Estate has established HIRARC Team lead by the Estate Manager. The team reviewed the HIRARC as per SOP established. FY 2024, the annual HIRARC review was conducted on 13/1/2024 with no changes in the HIRARC register. Previous HIRARC review due to accident occurrence was conducted on 03/04/2024 for weeding operation.</p> <p>Jernih Estate</p> <p>The estate has established HIRARC Team lead by the Estate Manager. The team reviewed the HIRARC as per SOP established. Latest FY 2024 HIRARC review was approved and documented on 07/05/2024 with no changes in the HIRARC register. Previous HIRARC review due to accident occurrence was conducted on 17/07/2024 for travelling activities to and from work sites.</p> <p>Notwithstanding, mitigation plans to control identified risks were insufficiently implemented for operations as following:</p>	
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		<p>Gajah Mati Estate:</p> <p>Visit to Field # P18B/1 for Manuring of Compound 33 (10/3/20+0.5%B2O3) operation, it was found that no eye protection worn by manuring workers while applying the fertilizer. Based on HIRARC for Manuring operation, it was identified that the existing control/mitigation plan for identified risk of fertilizer exposure/splash to eye is to wear eye protection. It was also verified that the Safety Data Sheet (SDS) of Compound 33 (10/3/20+0.5%B2O3) fertilizer that the eye protection required is safety goggles. Hence, the manuring workers were insufficiently implemented its control/mitigation plan for identified risk and hazard of the operation.</p> <p>Kemaman Palm Oil Mill:</p> <p>Visit to mill FFB ramp operation found that a shovel being use for FFB shovelling. Test on the shovel found that the honk and signal light were not functioning. Based on HIRARC for prime mover machine which includes shovel, it was identified that the existing control/mitigation plan for identified risk of accident is to ensure good maintenance and functionality of safety related features of shovel including reverse alarm, rotary light, head light, signal and honk etc. Hence, the shovel operation was insufficiently implemented its control/mitigation plan for identified risk and hazard of the operation.</p> <p>Air Putih Estate:</p> <p>Visit to Field # P14C/3 for Harvesting involving Mechanical Buffalo/Badang operation, it was found that the operator did not wear safety helmet while loading FFB and operating the machine. Based on HIRARC of Mechanical Buffalo/Badang, it was identified that the existing control/mitigation plan for identified risk of</p>	
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		<p>body/head injury is to wear PPE which includes safety helmet. Hence, the Mechanical Buffalo/Badang operation was insufficiently implemented its control/mitigation plan for identified risk and hazard of the operation.</p> <p>Thus, a nonconformity has been raised.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Kemaman POM and supply base certification unit has established the H&S plan documented in OSH Plan 2024. The plan cover on OSH legal compliance, emergency response plan, OSH management system, risk management and safety committee. Sighted the implementation as following:</p> <p>Gajah Mati Estate</p> <ul style="list-style-type: none"> - Chemical registers were reviewed on annually basis. Latest Register of Chemical Hazardous to Health update: 20/02/2024; DOSH Reg. # TGLS/PL/040/03. No class Ia and Ib chemical was used in the estate as per chemical register. - DOSH Reg. # TGLS/PL/040/03; Chemical Health Risk Assessment (CHRA) Report; Ref. # HQ/10/ASS/00/8 2022/062); Assessor: Dr. Yasriza Yahaya of Occumed Consultancy & Services Sdn. Bhd.; DOSH Reg. # HQ/10/ASS/00/8; Assessment date: 13/09/2022 - Annual medical surveillance was conducted by OHD with reg. no. HQ/08/DOC/00/352 on 23/10/2023. All workers attended were declared fit to work in chemical handling. - Workplace inspection was conducted on monthly basis. Sighted the inspection records dated 27/8/2024, 20/7/2024, 16/6/2024 and 30/5/2024. The results of workplace inspections were discussed in the Safety committee meeting. 	Complied

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		<p>Kemaman POM</p> <ul style="list-style-type: none">- The mill conducted CHRA every 5 years. Latest CHRA was conducted on 12/7/2020 by registered assessor with reg. no. HQ/08/ASS/00/259. Refer report no. HQ/08/ASS/00/259-2020/009. Next assessment due in July 2025.- CHRA as per DOSH Reg. # TGLS/PL/040/03; Chemical Health Risk Assessment (CHRA) Report Ref. # HQ/10/ASS/00/8 2022/062); Assessor: Dr. Yasriza Yahaya of Occumed Consultancy & Services Sdn. Bhd.; DOSH Reg. # HQ/10/ASS/00/8; Assessment date: 13/09/2022- LEV test was conducted on annually basis. Latest review was conducted on 14/04/2024 by registered hygiene technician with reg. no. HQ/08/JHII/00/76. Recommendation in the report has been addressed by the mill.- Medical surveillance was conducted on annually basis as recommended in CHRA. Latest medical surveillance was conducted on 22-23/7/2024. 11 employee who exposed with chemical were sent for surveillance and found fit to work as chemical handler.- Latest audiometric test was conducted on 26-27/06/2024 by SI Energy Sdn. Bhd. & IBRA Occuhealth Mobile Sdn. Bhd.; ATC Reg. # JKPP/2024/11-04/00001 & IBR AUDIO/007-JUNE-2024. 129 employees consist of 74 workers and 55 staff + execs were sent test. Results indicated the following: <table><tr><td>Finding</td><td>Total</td><td>Action</td></tr><tr><td>Normal audiogram</td><td>41</td><td>For yearly audiometric test</td></tr></table>	Finding	Total	Action	Normal audiogram	41	For yearly audiometric test	
Finding	Total	Action							
Normal audiogram	41	For yearly audiometric test							

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		Abnormal audiogram	31	Those with new case abnormal audiogram need for diagnostic audiometric test and OHD examination
		Hearing impairment	17	Those with new case abnormal audiogram need for diagnostic audiometric test and OHD examination
		Hearing loss	29	Recommendation of diagnostic and OHD report for SOCSO compensation
		Abnormal audiogram – Hearing loss & hearing impairment	1	For diagnostic audiometric test & OHD examination – Muhammad Hafizie bin Ibrahim
		Temporary standard threshold shift	10	Repeat audiometric test within 3 months
		Total	129	
		<p>Air Putih Estate</p> <ul style="list-style-type: none"> - Annual medical surveillance was conducted by OHD with reg. no. HQ/08/DOC/00/601 on 16/6/2024. 14 workers were sent for surveillance and found fit to work as chemical handlers. - First aid box monitoring was conducted on monthly basis and recorded in First Aid box monitoring logbook. Sighted the monitoring records of monitoring for the month of September, August and July 2024 		

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		<ul style="list-style-type: none"> - Workplace inspection was conducted on monthly basis. The results of workplace inspections were discussed in the Safety committee meeting. <p>Tebak Estate</p> <ul style="list-style-type: none"> - Chemical registers were reviewed on annually basis. Latest review was conducted on 02/01/2024. No class 1A and 1B chemical was used in the estate as per chemical register. - CHRA as per DOSH Reg. # TGLS/PL/04/02; Chemical Health Risk Assessment (CHRA) Report Ref. # JKPP HQ/10/ASS/00/8 2021/069); Assessor: Dr. Yasriza Yahaya of Occumed Consultancy & Services Sdn. Bhd.; DOSH Reg. # HQ/10/ASS/00/8; Assessment date: 01/06/2021. - Annual medical surveillance was conducted by Dr. Aisam Bin Abu Bakar of Klinik Bestari Sdn. Bhd.; DOSH OHD reg. # HQ/08/DOC/00/352 on 14 - 15/05/2024. - Workplace inspection was conducted on monthly basis. Sighted the inspection records dated 02/09/2024, 04/08/2024, and 09/07/2024. The results of workplace inspections were discussed in the OSH committee meeting conducted quarterly latest on 05/08/2024, 20/05/2024, 13/02/2024 & 11/12/2023 <p>Jernih Estate</p> <ul style="list-style-type: none"> - Chemical registers were reviewed on annually basis. Latest review was conducted on 01/01/2024. No class 1A and 1B chemical was used in the estate as per chemical register. - CHRA as per DOSH Reg. # TGLS/PL/04/02; Chemical Health Re-Assessment as per CHRA of Updated Chemicals for Pesticide Applicator and Fertilizer Applicator (Ref. to CHRA Report dated 	
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		<p>01/06/2021); Date: 28/06/2024 by Dr. Yasriza Yahaya of Occumed Consultancy & Services Sdn. Bhd.</p> <ul style="list-style-type: none"> - Annual medical surveillance was conducted by Dr. Aisam Bin Abu Bakar of Klinik Bestari Sdn. Bhd.; DOSH OHD reg. # HQ/08/DOC/00/352 on 29/07/2024. Result indicated all workers underwent surveillance found fit for chemical handling work. 	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>The mill and estate conducted training need analysis to identify training required for the employee and documented in Training Matrix FY 2024.</p> <p>The mill mill and estate has established training schedule FY 2024 base on training need analysis conducted. The training program covers Policy, operation and OSH/others.</p> <p>The program involves the executive, staff/field supervisor, workers and contractors. The identified training was programmed throughout the year.</p> <p>The mill and estate have also conducted assessment to the training attendees to assess the training efficiency.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <ul style="list-style-type: none"> - Minor Compliance - 	<p>The mill and estate maintain the training records for all employees. Sighted the training records as following:</p> <p>Gajah Mati Estate:</p> <ul style="list-style-type: none"> - Human rights policy training dated 3/4/2024 - Replanting OP to OP training dated 20/5/2024 - Agrochemical management policy training dated 20/5/2024 	Complied

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		<ul style="list-style-type: none"> - Palm manuring SOP training dated 13/6/2024 - Chemical calibration training dated 14/7/2024 - Boundary marking SOP training dated 7/8/2024 <p>Kemaman POM:</p> <ul style="list-style-type: none"> - SOP for receiving and issuing item from store training dated 04/02/2024 - SOP for office training dated 23/01/2024 - Audiometric test result briefing dated 11/08/2024 - Chemical handling for water treatment plant training dated 09/08/2024 - LEV inspection result briefing dated 27/07/2024 - First aid training dated 20/07/2024 <p>Air Putih Estate</p> <ul style="list-style-type: none"> - Company SOP and Policy training dated 2/1/2024 - 5's housekeeping training dated 5/2/2024 - First aid kit training dated 12/3/2024 - Security Guard SOP training dated 3/4/2024 - FFB quality training dated 5/5/2024 - Inter pump sprayer equipment training dated 15/6/2024 - Safety work procedure for workshop training dated 20/7/2024 - RSPO/MSPO, safety awareness for contractors training dated 10/8/2024 	
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		<ul style="list-style-type: none"> - Firefighting training dated 12/8/2024 <p>Tebak Estate:</p> <ul style="list-style-type: none"> - Firefighting & fire emergency evacuation training; Date: 24/09/2024 - SOP for fertilizer application safety training; Date: 24/09/2024 - Chemical mixing, triple rinsing & empty chemical container training; Date: 19/09/2024 - Buffer Zone Training; Date: 18/02/2024 - Biodiversity and environmental policy training dated 23/02/2024 - Tractor driver safety training; Date: 03/03/2024 - Palm manuring SOP training dated 21/03/2024 - Chemical handling training dated 10/8/2024 <p>Jernih Estate:</p> <ul style="list-style-type: none"> - Safety Data Sheet training dated 20/2/2024 - Creech Ayah's and first aid training dated 22/2/2024 - Spraying SOP training dated 11/3/2024 - Palm manuring SOP training dated 11/3/2024 - Rat baiting SOP training dated 4/4/2024 - Lorry, tractor and trailer driver training dated 25/7/2024 - RSPO/MSPO, safety awareness for workers training dated 25/7/2024 	
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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.</p> <p>To ensure understanding and awareness of the supply chain certification system among all workers, the management conducted training sessions. The reviewed training sessions include:</p> <p>SCCS Standard Operating Procedure training conducted on 09/07/2024.</p>	Complied
<p>Criterion 3.8: Supply chain requirement for mills</p> <p>(note: All supply chain requirements are considered as Critical (C). However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>The management at Kemaman Palm Oil Mill (POM) has established and documented the RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module (Edition: TDM/TRCBL/04, Rev. SCCS-02/2022, dated 01/01/2022). As defined in the Glossary section of this SOP, RSPO Identity Preserved refers to a supply chain model that guarantees RSPO-certified oil palm products delivered to the end user are traceable back to a single, RSPO-certified supply base.</p> <p>Kemaman POM exclusively receives and processes Fresh Fruit Bunches (FFB) from estates within its Unit of Certification (UoC), including Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. Additionally, the mill processes FFB from TDM-owned estates that fall under a different UoC, namely Sungai Tong POM & Supply Bases (Certificate No.</p>	Complied

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		<p>RSPO 595564), which include Pinang Emas Estate, Jerangau Estate, Tayor Estate, Jaya Estate, and Fikri Estate.</p> <p>During the audit, which involved both site visits and document reviews, it was confirmed that the mill does not receive or process FFB from outgrowers or smallholders. Consequently, Kemaman POM is classified as an Identity Preserved (IP) palm oil mill, as per the RSPO Supply Chain SOP.</p>	
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The management at Kemaman Palm Oil Mill (POM) has established and documented the RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module (Edition: TDM/TRCBL/04, Rev. SCCS-02/2022, dated 01/01/2022). As outlined in the Glossary section of this SOP, the RSPO Identity Preserved model ensures that RSPO-certified palm oil products delivered to the end user are traceable to a single, RSPO-certified supply base.</p> <p>Kemaman POM exclusively receives and processes Fresh Fruit Bunches (FFB) from its Unit of Certification (UoC) estates, including Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. Additionally, the mill processes FFB from other TDM-owned estates under a separate UoC, specifically from Sungai Tong POM & Supply Bases (Certificate No. RSPO 595564), which include Pinang Emas Estate, Jerangau Estate, Tayor Estate, Jaya Estate, and Fikri Estate.</p> <p>During the audit, which involved site visits and documentation reviews, it was confirmed that the mill does not receive or process FFB from outgrowers or smallholders. Consequently, this indicator is deemed Not Applicable to Kemaman POM.</p>	Not Applicable
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public</p>	Complied

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	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.	summary report. The actual tonnage produced from last audit date is reported in the summary in Table 10.											
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<div>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</div> <table><tr><td>Member Name</td><td>Kemaman Palm Oil Mill</td></tr><tr><td>Member ID</td><td>RSPO_AC1000001083</td></tr><tr><td>RSPO Membership Number</td><td>1-0095-11-000-00</td></tr><tr><td>Type of Business</td><td>Oil mill</td></tr><tr><td>Licence Status</td><td>Active (01-02-2024 - 31-10-2024)</td></tr></table>	Member Name	Kemaman Palm Oil Mill	Member ID	RSPO_AC1000001083	RSPO Membership Number	1-0095-11-000-00	Type of Business	Oil mill	Licence Status	Active (01-02-2024 - 31-10-2024)	Complied
Member Name	Kemaman Palm Oil Mill												
Member ID	RSPO_AC1000001083												
RSPO Membership Number	1-0095-11-000-00												
Type of Business	Oil mill												
Licence Status	Active (01-02-2024 - 31-10-2024)												
3.8.5	<div>Documented procedures</div> <div>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</div> <div><div>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</div><div>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</div><div>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and</div></div>	<div>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</div> <div>a) Refer Standard Operating Procedure (SOP) titled "RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module," Edition TDM/TRCBL/04, Rev. SCCS-02/2022, dated 01/01/2022. The SOP covers various key subjects to ensure effective implementation of RSPO supply chain requirements. The covered subjects include:</div> <div><div>• Introduction</div><div>• Objectives</div><div>• Responsibilities</div></div>	Complied										

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	<p>compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<ul style="list-style-type: none"> • Control Of Documents and Records • Delivery Of Fresh Fruit Bunches (FFB) From the Estate • Receiving FFB at the Mill • Process Monitoring • Crude Palm Oil (CPO) and Palm Kernel (PK) Dispatch • Handling Non-Conforming Products and/or Documents • Product Claims • Management of Outsourced Contractors • Training • Reclassification of Mill's Supply Chain Models • Production Line • Conversion Factors • Internal Audit • Handling Complaints • Management Review <p>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.</p> <p>c) Mill have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated in SOP Section 3.0 Responsibilities.</p>	
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		d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the SOP Section 5.0 Delivery Of FFB From The Estate and 6.0 Receiving FFB at Mill. There is no contamination since Kemaman POM does not received uncertified FFB.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>i) The Standard Operating Procedure (SOP) titled "RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module," Edition TDM/TRCBL/04, Rev. SCCS-02/2022, dated 01/01/2022, outlines a documented process for conducting an annual internal audit, as detailed in Section 16.0 – Internal Audit. The purpose of this audit is to verify the mill's compliance with the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents, while also assessing the effective implementation and maintenance of these standard requirements within the organization.</p> <p>ii) For the South Zone mill, a Supply Chain Internal Audit was conducted based on the sampled checklist. A memorandum was issued with the Audit Program (RSPO/MSPO/SCCS) for the fiscal year 2024. The audit was scheduled for 04/08/2024. There is no Non-Conformity Reports (NCR) were raised for Kemaman POM. If there is an NC raised, Root cause investigations were subsequently carried out as documented in the Sustainability Audit Corrective Action Report, which details the corrective actions, assigns a Person in Charge (PIC), and specifies due dates for the completion of these actions. The results of the internal audit were discussed in the Management Review Meeting. The mill has maintained records of the internal audit, including the audit report. The Corrective Action Plan, which includes root cause identification and correction details, has been sent to the internal auditor. This demonstrates a</p>	Complied

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		systematic approach to internal audit processes, corrective actions, and continuous improvement within the UoC.																									
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>Records verified during the audit include details such as the name and address of the product origin, name and address of the receiver, ticket number, delivery order number, contract number, date, quantity, transporter, type of product, and RSPO certificate number (including the validity of the certificate). Kemaman 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 (TDM Kemaman Pom Supply Bases)</p> <table><tr><td>Estate</td><td>Pelantoh Estate</td><td>Jernih Estate</td></tr><tr><td>Certified No</td><td>RSPO587626</td><td>RSPO587626</td></tr><tr><td>Date</td><td>09/09/2024</td><td>09/09/2024</td></tr><tr><td>Ticket No</td><td>KTP2436XXXX</td><td>KTP2436XXXX</td></tr><tr><td>Vehicle No</td><td>TBEXXX</td><td>TBHXXX</td></tr><tr><td>Field / Block</td><td>PM19B3S</td><td>PM05B1</td></tr><tr><td>Weight, MT</td><td>8.20MT</td><td>5.95MT</td></tr></table> <p>Certified Supply Base (Crop Diversion)</p> <table><tr><td>Estate</td><td>Fikri Estate</td><td>Jaya Estate</td></tr></table>	Estate	Pelantoh Estate	Jernih Estate	Certified No	RSPO587626	RSPO587626	Date	09/09/2024	09/09/2024	Ticket No	KTP2436XXXX	KTP2436XXXX	Vehicle No	TBEXXX	TBHXXX	Field / Block	PM19B3S	PM05B1	Weight, MT	8.20MT	5.95MT	Estate	Fikri Estate	Jaya Estate	Complied
Estate	Pelantoh Estate	Jernih Estate																									
Certified No	RSPO587626	RSPO587626																									
Date	09/09/2024	09/09/2024																									
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Weight, MT	8.20MT	5.95MT																									
Estate	Fikri Estate	Jaya Estate																									

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		<table><tr><td>Certified No</td><td>RSPO595564</td><td>RSPO595564</td></tr><tr><td>Date</td><td>05/07/2024</td><td>05/07/2024</td></tr><tr><td>Ticket No</td><td>KTP2435XXXX</td><td>KTP2435XXXX</td></tr><tr><td>Vehicle No</td><td>TAVXXX</td><td>TBFXXXX</td></tr><tr><td>Field / Block</td><td>PM04A2F</td><td>PM96A1B</td></tr><tr><td>Weight, MT</td><td>42.76MT</td><td>40.02MT</td></tr></table> <p>Mechanism to handle non-conforming FFB and documents has been detailed up in the SOP Section 9.0 Non Conforming Products And/Or Documents.</p>	Certified No	RSPO595564	RSPO595564	Date	05/07/2024	05/07/2024	Ticket No	KTP2435XXXX	KTP2435XXXX	Vehicle No	TAVXXX	TBFXXXX	Field / Block	PM04A2F	PM96A1B	Weight, MT	42.76MT	40.02MT	
Certified No	RSPO595564	RSPO595564																			
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Ticket No	KTP2435XXXX	KTP2435XXXX																			
Vehicle No	TAVXXX	TBFXXXX																			
Field / Block	PM04A2F	PM96A1B																			
Weight, MT	42.76MT	40.02MT																			
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none">a) The name and address of the buyer;b) The name and address of the seller;c) The loading or shipment / delivery date;d) The date on which the documents were issued;e) RSPO certificate number;	<p>TDM Kemaman POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - IP</p> <ul style="list-style-type: none">a) The name and address of the buyer; BUYERXXXXXXb) The name and address of the seller; TDM Kemaman POMc) The loading or shipment / delivery date; 10/06/2024d) The date on which the documents were issued; 10/06/2024e) RSPO Certificate Number: RSPO587626f) A description of the product: CPO IPg) The quantity of the products delivered; 44.82MTh) Any related transport documentation; BHPXXXX	Complied																		

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	<ul style="list-style-type: none"> f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> i) A unique identification number: R064XXXX PK - IP a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; TDM Kemaman POM c) The loading or shipment / delivery date; 24/06/2024 d) The date on which the documents were issued; 24/06/2024 e) RSPO Certificate Number: RSPO587626 f) A description of the product: PK IP g) The quantity of the products delivered; 46.49MT h) Any related transport documentation; QCKXXXX i) A Unique identification number: KTS2414XXXX 	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure 	<p>TDM Kemaman POM has established RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022, dated 01/01/2022 related Outsourcing Activities. Refer Sustainable Supply chain and Traceability Procedure dated January 2024 with reference number SDP/GSD/202401/SCCS Section 13.0.</p> <ul style="list-style-type: none"> i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for TDM Kemaman POM was for CPO and PK transportation. ii. Sighted the contract agreement between TDM Kemaman POM and contractor: <ul style="list-style-type: none"> a) TDM Kemaman POM has legal ownership of all input material to be included in the outsourced process. Refer 	Complied

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	<p>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>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 TDM Kemaman POM and CPO Transportation MXXXX TXXXXXXXXX Validity 20/05/2024 until 31/12/2024. The agreement was detailed up on the matter that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) 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. As per Supply chain procedure, mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. Latest communication was conducted during SCC training dated 06/02/2024.</p> <p>d) The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements. Refer Section 11 Outsourced Contractor that details on 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>	
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

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3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There is a new contractors used for the handling of certified CPO and PK. As per stated in the procedure Section 11.6 "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". The notification to CB has been verified.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> 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. 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. 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. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> 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. 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>Kemaman POM adheres to the Standard Operating Procedure (SOP) established by TDM to maintain comprehensive records of evidence related to the implementation of RSPO Supply Chain Certification Standard (SCCS). The specific SOP, documented in "RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module," Edition: TDM/TRCBLT/04, Revision: SCCS – 02/2022, dated 01/01/2022, guides the management of traceability records.</p> <p>Record Keeping</p> <ul style="list-style-type: none"> 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. ii) The retention period for maintaining the traceability records is 5 years as stated in the SOP Section 4.4 " All record are maintained for a period of five (5) years. iii) TDM Kemaman POM has record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) NA since TDM Kemaman POM was IP Mill 	Complied

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	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.								
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Verified OER and KER as below.</p> <table><tr><td>Month</td><td>OER</td><td>KER</td></tr><tr><td>Oct 2023 – Aug 2024</td><td>19.90%</td><td>4.26%</td></tr></table>	Month	OER	KER	Oct 2023 – Aug 2024	19.90%	4.26%	Complied
Month	OER	KER							
Oct 2023 – Aug 2024	19.90%	4.26%							
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>According to an interview with the Mill Manager, the mill announces the percentages of Oil Extraction Rate (OER) and Kernel Extraction Rate (KER) each morning if processing activities occur daily. The conversion factors for Crude Palm Oil (CPO) and Palm Kernel (PK) production are based on the actual OER and KER. These conversion factors are recorded daily in the Daily Production Report.</p> <p>At the end of each month, the mill provides the average OER and KER rates to the relevant parties. A summary report, prepared by the Mill Manager, was reviewed during the audit.</p>	Complied						
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>The management at Kemaman Palm Oil Mill (POM) has established and documented the RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module (Edition: TDM/TRCBL/04, Rev. SCCS-02/2022, dated 01/01/2022). As defined in the Glossary section of this SOP, RSPO Identity Preserved refers to a supply chain model that ensures RSPO-certified palm oil products delivered to the end user are traceable to a single, RSPO-certified supply base.</p>	Complied						

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		<p>From October 2023 to August 2024, Kemaman POM exclusively received and processed Fresh Fruit Bunches (FFB) from its Unit of Certification (UoC) estates, including Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. Additionally, the mill processed FFB from other TDM-owned estates under a separate UoC, specifically from Sungai Tong POM & Supply Bases (Certificate No. RSPO 595564), which include Pinang Emas Estate, Jerangau Estate, Tayor Estate, Jaya Estate, and Fikri Estate.</p> <p>During the audit, which included site visits and document reviews, it was confirmed that the mill did not receive or process FFB from outgrowers or smallholders. Consequently, Kemaman POM is classified as an Identity Preserved (IP) palm oil mill, as per the RSPO Supply Chain SOP.</p>	
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Registration of transactions</p> <p>i) The registration of PalmTrace is carried out by the TDM Trading, 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 has been removed in the IT Platform. Sample of removal has been made for CPO and PK has been verified.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<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

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General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a “non-product related” claim.	<p>TDM Plantation Sdn. Bhd. (TDMP) has highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO via their official website i.e. https://www.tdmberhad.com.my/who-we-are/plantation-division/</p> <p>Trademark licence used was expired.</p> <p>Based on verification through website https://www.tdmberhad.com.my/who-we-are/plantation-division/, it was found the used of trademark licence #1-0095-11-100-00 which already expired on 12/04/2024. Thus, non compliance was raised.</p>	Non-compliance
4.2	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none"> A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member’s history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership 	From the TDM Plantation Sdn. Bhd. (TDMP) official website verified that the statement all is done accordingly the requirement except (E). However Nc has been raised in the indicator 4.1.	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Based on desktop review, site visit and documentation review it is verified that the RSPO corporate logo is not use by the UoC.	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 desktop review, site visit and documentation review it is verified that the no such communication has been made by the UoC.	Complied

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4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • “We have been sourcing RSPO certified palm oil since (YEAR).” • “We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year.” • “We have been RSPO certified since (YEAR).” • “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.” • “In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified.” • “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.” • “We are RSPO certified. Ask us for our RSPO certified products.” 	<p>Based on desktop review, site visit and documentation review it is verified that the company insert the statement of “In 2013, TDMP became the first plantation in Terengganu and among the few elite companies in Malaysia to achieve 100% RSPO certification”.</p>	Complied
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <ol style="list-style-type: none"> “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).” X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) 	<p>Kemaman POM & Supply Bases is under TDM Plantation Sdn Bhd, which holds RSPO Membership Number 1-0095-11-000-00.</p> <p>Therefore, this indicator is Not Applicable.</p>	Not Applicable

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	<p>Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".</p>		
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	TDM Plantation Sdn. Bhd. (TDMP) has highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO via their official website i.e., https://www.tdmberhad.com.my/who-we-are/plantation-division/	Complied
5.1.2	Product-specific communications are voluntary.	Based on desktop review, site visit and documentation review it is verified that no Product-specific communication has been made by the UoC.	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.	Based on desktop review, site visit and documentation review it is verified that no Product-specific communication has been made by the UoC.	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.	Based on desktop review, site visit and documentation review it is verified that no Product-specific communication has been made by the UoC.	Complied
5.1.5	If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified	Based on the registration at RSPO PalmTrace, the Type of Business of the UoC is Oil Mill. Therefore, this indicator is Not Applicable.	Not Applicable

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	<p>supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
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>Based on the registration at RSPO PalmTrace, the Type of Business of the UoC is Oil Mill. Therefore, this indicator is Not Applicable.</p>	Not Applicable
5.2 Off pack claims			
5.2.1	<p>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</p>	<p>TDM Plantation Sdn. Bhd. (TDMP) highlights its RSPO membership and commitment to the objectives and principles of RSPO through its official website at https://www.tdmerhad.com.my/who-we-are/plantation-division/. However, the RSPO label is not used on official documents such as letterheads, business cards, shipping documents, invoices, or similar materials.</p>	Complied

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	should be used together with the valid trademark licence number wherever an off pack claim is made.		
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.	<p>TDM Kemaman POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - IP</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; TDM Kemaman POM c) The loading or shipment / delivery date; 10/06/2024 d) The date on which the documents were issued; 10/06/2024 e) RSPO Certificate Number: RSPO587626 f) A description of the product: CPO IP g) The quantity of the products delivered; 44.82MT h) Any related transport documentation; BHPXXXX i) A unique identification number: R064XXXX <p>PK - IP</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; TDM Kemaman POM c) The loading or shipment / delivery date; 24/06/2024 d) The date on which the documents were issued; 24/06/2024 e) RSPO Certificate Number: RSPO587626 f) A description of the product: PK IP 	Complied

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		g) The quantity of the products delivered; 46.49MT h) Any related transport documentation; QCKXXX i) A Unique identification number: KTS2414XXX	
5.2.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	As TDM Kemaman POM is an Oil Mill, which only processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable
5.3 On pack claims			
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	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.	Complied
5.3.2	In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label.	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.	Complied

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	<p>The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>		
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>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>Complied</p>
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>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>Complied</p>
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>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>Complied</p>

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5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	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.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	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.	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.	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.	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.	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.	Complied
MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	<p>The management at Kemaman POM has established and documented the RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022, dated 01/01/2022. As defined in the Glossary of this SOP, RSPO Identity Preserved refers to a supply chain model that guarantees RSPO certified palm oil products delivered to the end user are traceable to a single RSPO certified supply base.</p> <p>During the audit, which included site visits and documentation reviews, it was found that the mill does not receive or process FFB from outgrowers or smallholders. Consequently, Kemaman POM is</p>	Complied

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		classified as an Identity Preserved (IP) palm oil mill, in accordance with the RSPO Supply Chain SOP. Therefore, the palm oil content is 100% RSPO IP certified.	
	If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	<p>The management at Kemaman POM has established and documented the RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022, dated 01/01/2022. As defined in the Glossary of this SOP, RSPO Identity Preserved refers to a supply chain model that guarantees RSPO certified palm oil products delivered to the end user are traceable to a single RSPO certified supply base.</p> <p>During the audit, which included site visits and documentation reviews, it was found that the mill does not receive or process FFB from outgrowers or smallholders. Consequently, Kemaman POM is classified as an Identity Preserved (IP) palm oil mill, in accordance with the RSPO Supply Chain SOP. Therefore, the palm oil content is 100% RSPO IP certified.</p>	Complied
Messaging			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> • The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org • RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain.www.rspo.org 	Based on desktop review, site visit and documentation review it is verified that no Product-specific communication has been made by the UoC.	Complied

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	<ul style="list-style-type: none">• Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org• The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org<ul style="list-style-type: none">• RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org					
Product-Specific Communications Labelling						
	Members are allowed to use the RSPO Label in one of the following ways: <ul style="list-style-type: none">• RSPO Trademark that includes the tag "CERTIFIED"; or<ul style="list-style-type: none">• RSPO Trademark that includes the tag "This product contains certified sustainable palm oil".	Based on desktop review, site visit and documentation review it is verified that no Product-specific communication has been made by the UoC.	Complied			
Principle 4: Respect community and human rights and deliver benefits						
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.						
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantation Sdn Bhd has established and continuously implemented Human Rights Policy, dated 23/02/2023 and approved by the CEO, affirms the company's commitment to upholding the the commitment of management on respecting human right by upholding international human rights principles and standards as encapsulated in the Universal Declaration of Human Rights (UDHR)</p> <p>Communication of the policy has been conducted regularly to all internal and external stakeholders as table below:</p> <table><tr><td>Estate</td><td>Internal Stakeholder</td><td>External Stakeholder</td></tr></table>	Estate	Internal Stakeholder	External Stakeholder	Complied
Estate	Internal Stakeholder	External Stakeholder				

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		<table><tr><td>Gajah Mati Estate</td><td>20/08/2024</td><td rowspan="5">28/08/2024</td></tr><tr><td>Kemaman POM</td><td>13/06/2024</td></tr><tr><td>Air Putih Estate</td><td>15/04/2024</td></tr><tr><td>Tebak Estate</td><td>12/05/2024</td></tr><tr><td>Jernih Estate</td><td>19/08/2024</td></tr></table> <p>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 operating unit. During the interview with some of the workers (both local and migrant), they mentioned that they were aware of such policy and commitments by company even though they are not able to remember it word by word but is reflected in their working environment.</p>	Gajah Mati Estate	20/08/2024	28/08/2024	Kemaman POM	13/06/2024	Air Putih Estate	15/04/2024	Tebak Estate	12/05/2024	Jernih Estate	19/08/2024	
Gajah Mati Estate	20/08/2024	28/08/2024												
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Air Putih Estate	15/04/2024													
Tebak Estate	12/05/2024													
Jernih Estate	19/08/2024													
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>As reflect earlier in indicator 4.1.1, TDM Plantation Sdn Bhd prohibits any form of harassment and violence by established Human Rights Policy.</p> <p>No evidence found during the audit that the certification unit has instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>Based on the interview with the sampled workers, all operating unit is against any form of violence and prohibit such act from taking place in the certification unit. Any occurrence of violence and harassment from any level of employees including management will be reported and will not be tolerated.</p>	Complied											

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		Furthermore, the workers interviewed confirmed that no occurrence of harassment or violence has occurred that has come to their knowledge. No harsh or insulting words are in used for giving orders to do the operation tasks, have been reported by workers	
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantation Sdn Bhd refer to Stakeholder Communication Procedure (Complaint, Grievance, Information Request, dated 01/10/2022, Rev. 01/2022 for handling complaints and grievances. This SOP applies for management of grievances received through designated channels, which may be submitted by any internal or external stakeholder, its employees (including operational labour), contractors, consultants, suppliers, vendors and any other associated third parties.</p> <p>Depending on seriousness of case, the complaints may take 14 days to resolve by estate/mill management, and another additional 14 days if escalated to TDM Headquarters office.</p> <p>Internally, system for addressing the complaints and grievances raised by the workers are through complaint box, grievance/complaint book, and worker's representative</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>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. In addition, the procedure is communicated to workers during morning briefings or roll calls before the start of work.</p>	Complied

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		<p>Communication of the policy has been conducted regularly to all internal and external stakeholders as table below:</p> <table><tr><th>Estate</th><th>Internal Stakeholder</th><th>External Stakeholder</th></tr><tr><td>Gajah Mati Estate</td><td>20/08/2024</td><td rowspan="5">28/08/2024</td></tr><tr><td>Kemaman POM</td><td>13/06/2024</td></tr><tr><td>Air Putih Estate</td><td>15/04/2024</td></tr><tr><td>Tebak Estate</td><td>12/05/2024</td></tr><tr><td>Jernih Estate</td><td>19/08/2024</td></tr></table> <p>Furthermore, the level of the understanding for the workers on the procedure relating to protection of complainant is sufficient whereby the workers are able to properly demonstrate the procedure as verified during interview with sampled workers consists of Malaysian, Indonesian, and Bangladeshi workers. For illiterate workers, representatives from Indonesia, and Bangladesh, consistently will help explain the procedures. This was confirmed during interviews, where workers stated that their representatives assist them with any issues they face. They mentioned that they were aware of the grievance procedure established by company even though they are not able to remember it word by word, but the management always remind about it during morning muster and other training or meeting.</p>	Estate	Internal Stakeholder	External Stakeholder	Gajah Mati Estate	20/08/2024	28/08/2024	Kemaman POM	13/06/2024	Air Putih Estate	15/04/2024	Tebak Estate	12/05/2024	Jernih Estate	19/08/2024	
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4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	All progress, timeframe and outcome of complaint and grievance were informed to the complainant as verified in the complaint book. Record of complaint have been maintained for each operating unit.	Complied														

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	- Minor compliance -	Resolution of complaint has been resolved immediately after the complaint received depending on budget involved, seriousness of the complaint and level of complexity. Acknowledgement from complainant in the complaint book and form indicates that the complaint has been satisfactorily resolved. This has been verified during interview session with sampled workers under. Observed that major complaint is on damage at workers housing.	
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>	The conflict resolution mechanism is outlined in the Communication Procedure – *Carta Aliran Pengendalian Isu Sosial (Stakeholder)* (Aduan/Rungutan/Permohonan) / Social Issues Flowchart (Stakeholders) (Complaint/Application), rev. 2/2017. According to this procedure, mediation is included in the consultation process to facilitate resolution. It allows the complainant to be represented by personnel they appoint, such as the workers' union (NUPW) especially for legal and technical advice. For external parties, they may choose any individual to act as an observer, with the option of involving a third-party mediator.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	All operating unit 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 approved, the stakeholders are then be informed and that the contribution is executed accordingly.	Complied

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		<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 under TDM Kemaman POM and Supply Bases. For example, as below:</p> <ul style="list-style-type: none"> • Establishment of recreational facilities, including a football field, community hall, and mosque • Financial Aid for Parent and Teacher's Association, Sek Keb Ladang Gajah Mati • Sponsoring transportation for schools to participate in tournaments outside Terengganu. • Financial Aid for Parent and Teacher's Association, Sek Men Keb Seri Bandi 	
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>It was found that oil palm activities by the mill and estates under Kemaman POM complex 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>Gajah Mati Estate</p> <p>There is one land title show Title No: 14644, lot No. 3999, with hectarage 5,139.00, purpose for agriculture activity only, within Dungun District and Terengganu State.</p> <p>Tebak Estate</p>	Complied

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		<p>Tebak Estate total land title 6 as per summary of Land Title sighted samples as following:</p> <ul style="list-style-type: none"> Title # 18274; Lot # 2514; District: Kemaman; Sub-District: Mukim Tebak Title # HSD 2872; PT # PT 402; District: Kemaman; Sub-District: Mukim Tebak Title # HSD 1779; PT # PT 1666; District: Kemaman; Sub-District: Mukim Tebak <p>Air Putih Estate:</p> <p>Total 14 land titles, sampled:</p> <ul style="list-style-type: none"> Title No. 9194; Area: 129.4995 Ha.; Years of Ownership/Used: 24 March 1966. Title No. 9196; Area: 414.3984 Ha.; Years of Ownership/Used: 24 March 1966. Title No. 9195; Area: 984.1963 Ha.; Years of Ownership/Used: 24 March 1966. Title No. 9197; Area: 1,916.5928 Ha.; Years of Ownership: 24 March 1966. <p>Jernih Estate</p> <p>There are 4 samples of land title viewed as below:</p> <ul style="list-style-type: none"> Title No. H.S. (D): 9199; Lot No. 20; Mukim Tebak; Daerah Kemaman; Area: 1,496.64 Ha.; Years of Ownership/Used: 05/10/1967 	
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		<ul style="list-style-type: none"> Title No. H.S. (D): 1779; Lot No. PT 1666; Mukim Tebak; Daerah Kemaman; Area: 3,681.10 Ha.; Years of Ownership/Used: 20/12/1992 Title No. 18274; Lot No. 2514; Mukim Tebak; Daerah Kemaman; Area: 218.30 Ha.; Years of Ownership/Used: 06/01/1975 Title No. H.S. (D): 2872; Lot No. PT 402(B); Mukim Tebak; Daerah Kemaman; Area: 198.19 Ha.; Years of Ownership/Used: 06/01/1975 	
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 operating unit under Kemaman POM complex 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 has been found and recorded.</p> <p>Further verification during interview with stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues. It also has been verified on documentation review by review the complaint and grievance logbook.</p>	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>As reflected earlier in indicator 4.4.1, all operating unit under Kemaman POM complex 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 has been found and recorded.</p> <p>Further verification during interview with stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues. It also has been verified on</p>	Complied

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		documentation review by review the complaint and grievance logbook.	
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 operating unit under Kemaman POM complex 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 has been found and recorded. Further verification during interview with stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues. It also has been verified on documentation review by review the complaint and grievance logbook.	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 operating unit under Kemaman POM complex 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 has been found and recorded. Further verification during interview with stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues. It also has been verified on documentation review by review the complaint and grievance logbook.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	All operating unit under Kemaman POM complex 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 has been found and recorded. Further verification during interview with stakeholders which consists of local communities and neighbouring estates confirms	Complied

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		that there are no land dispute issues. It also has been verified on documentation review by review the complaint and grievance logbook.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	All operating unit under Kemaman POM complex 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 has been found and recorded. Further verification during interview with stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues. It also has been verified on documentation review by review the complaint and grievance logbook.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	All operating unit under Kemaman POM complex 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 has been found and recorded. Further verification during interview with stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues. It also has been verified on documentation review by review the complaint and grievance logbook.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	All operating unit under Kemaman POM complex 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 has been found and recorded. Further verification during interview with stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues. It also has been verified on	Complied

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		documentation review by review the complaint and grievance logbook.	
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	<p>It was found that oil palm activities by the mill and estates under Kemaman POM complex 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>Gajah Mati Estate</p> <p>There is one land title show Title No: 14644, lot No. 3999, with hectarage 5,139.00, purpose for agriculture activity only, within Dungun District and Terengganu State.</p> <p>Tebak Estate</p> <p>Tebak Estate total land title 6 as per summary of Land Title sighted samples as following:</p> <ul style="list-style-type: none"> Title # 18274; Lot # 2514; District: Kemaman; Sub-District: Mukim Tebak Title # HSD 2872; PT # PT 402; District: Kemaman; Sub-District: Mukim Tebak Title # HSD 1779; PT # PT 1666; District: Kemaman; Sub-District: Mukim Tebak <p>Air Putih Estate:</p> <p>Total 14 land titles, sampled:</p>	Complied

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		<ul style="list-style-type: none"> Title No. 9194; Area: 129.4995 Ha.; Years of Ownership/Used: 24 March 1966. Title No. 9196; Area: 414.3984 Ha.; Years of Ownership/Used: 24 March 1966. Title No. 9195; Area: 984.1963 Ha.; Years of Ownership/Used: 24 March 1966. Title No. 9197; Area: 1,916.5928 Ha.; Years of Ownership: 24 March 1966. <p>Jernih Estate</p> <p>There are 4 samples of land title viewed as below:</p> <ul style="list-style-type: none"> Title No. H.S. (D): 9199; Lot No. 20; Mukim Tebak; Daerah Kemaman; Area: 1,496.64 Ha.; Years of Ownership/Used: 05/10/1967 Title No. H.S. (D): 1779; Lot No. PT 1666; Mukim Tebak; Daerah Kemaman; Area: 3,681.10 Ha.; Years of Ownership/Used: 20/12/1992 Title No. 18274; Lot No. 2514; Mukim Tebak; Daerah Kemaman; Area: 218.30 Ha.; Years of Ownership/Used: 06/01/1975 Title No. H.S. (D): 2872; Lot No. PT 402(B); Mukim Tebak; Daerah Kemaman; Area: 198.19 Ha.; Years of Ownership/Used: 06/01/1975 	
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced	No new planting and acquisition on the new land is planned and occurred in the estate and mill under TDM Plantation Kemaman POM Complex based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders. The existing estates are not subject to any legal,	Complied

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	<p>access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>customary, or user rights. Evidence shows that the land was legally purchased or leased. As a result, the assessment of community representation through institutions of their own choosing is not applicable in this context.</p>	
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>No new planting and acquisition on the new land is planned and occurred in the estate and mill under TDM Plantation Kemaman POM Complex based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders. The existing estates are not subject to any legal, customary, or user rights. Evidence shows that the land was legally purchased or leased. As a result, the assessment of community representation through institutions of their own choosing is not applicable in this context.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>No new planting and acquisition on the new land is planned and occurred in the estate and mill under TDM Plantation Kemaman POM Complex based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders. The existing estates are not subject to any legal, customary, or user rights. Evidence shows that the land was legally purchased or leased. As a result, the assessment of community representation through institutions of their own choosing is not applicable in this context.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>No new planting and acquisition on the new land is planned and occurred in the estate and mill under TDM Plantation Kemaman POM Complex based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders. The existing estates are not subject to any legal, customary, or user rights. Evidence shows that the land was legally purchased or leased. As a result, the assessment of community</p>	Complied

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		representation through institutions of their own choosing is not applicable in this context.	
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 -	No new planting and acquisition on the new land is planned and occurred in the estate and mill under TDM Plantation Kemaman POM Complex based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders. The existing estates are not subject to any legal, customary, or user rights. Evidence shows that the land was legally purchased or leased. As a result, the assessment of community representation through institutions of their own choosing is not applicable in this context.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There is no evidence of any land acquired for plantations or mill after 15 November 2018 within Kemaman POM & Supply Bases.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no evidence of any new lands acquired in areas inhabited by communities in voluntary isolation.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	The process for resolving land disputes is clearly defined in the "Flowchart and Procedures for Handling Land Disputes" , Doc. No. TDMP/SOPESTATE/01, Rev. SOP ESTATES/REV 00, Ver. 1, 2013, Issue 1, dated 02/01/2024, effective from 01.01.2017.	Complied

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		The negotiation and compensation processes will proceed based on mutual agreement between the parties. A verification process will be conducted, and all affected stakeholders will be notified. Examples of such disputes include boundary disagreements, conflicts with landowners, and land ownership issues. The objective is to ensure that disputes are settled in a participatory and timely manner. This procedure is regularly communicated to external stakeholders during stakeholder meetings dated 28/08/2024.	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	The process for resolving land disputes is clearly defined in the "Flowchart and Procedures for Handling Land Disputes", Doc. No. TDMP/SOPESTATE/01, Rev. SOP ESTATES/REV 00, Ver. 1, 2013, Issue 1, dated 02/01/2024, effective from 01.01.2017. It was stated compensation will be paid according to series of discussion, due diligence and market land price accordingly. The process was established and implemented accordingly and evaluated in a participatory way. If any issue raises, all the corrective action will be taken as a result of the evaluation.	Complied
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>	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.	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>	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.	Complied
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			

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4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	There is a guidance procedure for "Flowchart and Procedures on Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOPESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	The process for resolving land disputes is clearly defined in the "Flowchart and Procedures for Handling Land Disputes", Doc. No. TDMP/SOPESTATE/01, Rev. SOP ESTATES/REV 00, Ver. 1, 2013, Issue 1, dated 02/01/2024, effective from 01.01.2017. It was stated compensation will be paid according to series of discussion, due diligence and market land price accordingly. The process was established and implemented accordingly and evaluated in a participatory way. If any issue raises, all the corrective action will be taken as a result of the evaluation.	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>	The sample estates follows the established Flowchart Social Issue Communication Flowchart (version 2.0/2017) for addressing social issues and the Procedures for External and Internal Communication to manage communication, consultations, and complaints from stakeholders, including boundary disputes. The procedures also clearly outline the process for compensation. There is no issue that communities have lost access and rights to land for plantation expansion.	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
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.	No land disputes occurred and recorded in the estate and mill under TDM Plantation Kemaman POM Complex based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders. The existing estates	Complied

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	- Minor compliance -	are not subject to any legal, customary, or user rights. Evidence shows that the land was legally purchased or leased. If any, the process for resolving land disputes will be implemented as in the "Flowchart and Procedures for Handling Land Disputes", Doc. No. TDMP/SOPESTATE/01, Rev. SOP ESTATES/REV 00, Ver. 1, 2013, Issue 1, dated 02/01/2024, effective from 01.01.2017.	
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	No land disputes occurred and recorded in the estate and mill under TDM Plantation Kemaman POM Complex based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders. The existing estates are not subject to any legal, customary, or user rights. Evidence shows that the land was legally purchased or leased.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	There is no evidence of acquisition land for all estates under Kemaman POM and supply bases Complex. It has been confirmed through interview with local communities, neighbouring estates and documentations review.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No land disputes occurred and recorded in the estate and mill under TDM Plantation Kemaman POM Complex based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders. The existing estates are not subject to any legal, customary, or user rights. Evidence shows that the land was legally purchased or leased.	Complied
Principle 5: Support smallholder inclusion			

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Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region. The mill received FFB from sister estate from own certification unit and FFB diversion from group certified Group mill only. The FFB supplier were listed in the Kemaman POM FFB Supplier list.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	The mill received FFB from sister estate from own certification unit and FFB diversion from group certified Group mill only. Hence, this is not applicable.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	The mill received FFB from sister estate from own certification unit and FFB diversion from group certified Group mill only. Hence, this is not applicable.	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	The mill received FFB from sister estate from own certification unit and FFB diversion from group certified Group mill only. Hence, this is not applicable.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	The mill received FFB from sister estate from own certification unit and FFB diversion from group certified Group mill only. Hence, this is not applicable.	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	The mill received FFB from sister estate from own certification unit and FFB diversion from group certified Group mill only. For	Complied

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	- Critical (Major) compliance -	contractor and supplier other than FFB, payment made within 30 days upon receipt of supplier's invoices. Payment was made through the financial department at head office. Sampled payment sighted as per sample payment for contractors and suppliers on 27/8/2024 as following: - Westari Corporation Sdn. Bhd.; Invoice date: 31/7/2024; Payment voucher # PV0772 - Ainmanna Enterprise; Invoice date: 31/7/2024; Payment voucher # PV2297	
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 -	Weighbridge calibration conducted on 14/1/2024 by Teras Integrasi Sdn Bhd as per verified records of latest calibration by Metrology Corporation Malaysia Sdn. Bhd. refer certificate no. B1566289 and safety sticker no. 2.1K QC04982.	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 -	No independent smallholders within Kemaman POM certification unit. Hence, this is not applicable.	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well. No independent smallholders within Kemaman POM certification unit	Complied

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Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	The mill received FFB from sister estate from own certification unit and FFB diversion from group certified Group mill only. Hence, this is not applicable.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	The mill received FFB from sister estate from own certification unit and FFB diversion from group certified Group mill only. Hence, this is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	The mill received FFB from sister estate from own certification unit and FFB diversion from group certified Group mill only. Hence, this is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The mill received FFB from sister estate from own certification unit and FFB diversion from group certified Group mill only. Hence, this is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	The mill received FFB from sister estate from own certification unit and FFB diversion from group certified Group mill only. Hence, this is not applicable.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			

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6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantation Sdn Bhd effectively implementing their Human Rights Policy dated 23/02/2023. These policies affirm the company's commitment to treating everyone equally, without discrimination, and to providing equal opportunities regardless of race, disability, nationality, gender, political background and religion.</p> <p>Interviewed with the workers comprises of different gender, period of services, and nationalities confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability. The worker can request for job transfer if found that they are unfit for the job assigned to them.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interviews with sampled workers of different genders and nationalities at operating units, it was confirmed that no discrimination had been reported, and the management of each unit has treated them fairly. The management has ensured equal treatment for all employees, for example, in the provision of accommodation, medical care, job opportunities, and wage rates. Additionally, there were no recruitment fees charged to foreign workers. According to the interviews, promotions and job opportunities were based on workers' capabilities and discipline. For instance, a female worker worked as BTS Grader, a role typically held by men, and migrant workers have been promoted as mandore. On top of that, Bangladeshi workers are now also involved as FFB cutter, even though this job was previously dominated by Indonesian workers.</p>	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>The process for recruitment, selection, hiring, promotion, retirement, and termination were assured via their Foreign Workers Policy, dated 23/02/2024. The document explains that promotion</p>	Complied

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	- Minor compliance -	<p>criteria are determined by the candidates' capability, qualifications, and performance in interviews as specified in the MAPA/NUPW agreement.</p> <p>Through interviews with sampled workers who were promoted to their current positions confirmed that the promotion was based on their performance and skill. Some of the interviewed workers started as general workers who were promoted to Mandores.</p> <p>During the interview with the female workers, they mentioned that there is room for them to move around within the job scope that suitable with their performance and skill.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Based on interview with sampled female workers at the mill and the estates confirmed that the management has never impose any pregnancy test during their tenure in the operating unit. No requirement for pregnancy test to be conducted in each operating unit. The test is only carried out by themselves if they suspected to be pregnant. According to the female workers, they are responsible for their own family planning.</p> <p>Once a female worker becomes pregnant, if she is involved in handling chemicals, she will be transferred to a less risky job following a documented discussion with the worker herself.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Estates and mill established Gender Committee to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>Verified at both mill and estate's committee members were elected among female staffs and employees. Meetings are to be conducted once every three (3) months or whenever necessary accordingly.</p> <p>Gender Committee meetings for each operating unit were conducted as shown in the table below. Based on the last three</p>	Complied

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		<p>meetings, it was verified that the discussions primarily focused on create awareness on type of sexual harassment, channels for lodge related complaint if any case happened and new mother needs assessment criteria.</p> <table><tr><td>Estate</td><td>Date of meeting</td></tr><tr><td>Gajah Mati Estate</td><td>10/09/2024</td></tr><tr><td>Kemaman POM</td><td>19/06/2024</td></tr><tr><td>Air Putih Estate</td><td>20/08/2024</td></tr><tr><td>Tebak Estate</td><td>12/06/2024</td></tr><tr><td>Jernih Estate</td><td>24/07/2024</td></tr></table> <p>Interviews with committee members and female workers revealed that they are all well-informed about the company's commitment to addressing sexual harassment, concerns regarding women's rights, and related issues.</p>	Estate	Date of meeting	Gajah Mati Estate	10/09/2024	Kemaman POM	19/06/2024	Air Putih Estate	20/08/2024	Tebak Estate	12/06/2024	Jernih Estate	24/07/2024	
Estate	Date of meeting														
Gajah Mati Estate	10/09/2024														
Kemaman POM	19/06/2024														
Air Putih Estate	20/08/2024														
Tebak Estate	12/06/2024														
Jernih Estate	24/07/2024														
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>It was confirmed that both mill and estate were demonstrating equal pay for the same job roles. Workers across all units receive a base pay aligned with the minimum wages order of RM57.70 per day per person in 2024. While for piece-rate work, the documentation indicates fixed rates irrespective of gender and nationality but differ based on type and scope of job as per MAPA/NUPW collective agreement version 2019.</p> <p>Interview session with the workers confirmed the statement.</p>	Complied												

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Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Workers samples across Kemaman POM and supply bases have been identified according to gender, nationality, job scope, duration of employment and position hold in welfare committee and gender committee.</p> <p>Document review on sampled workers' employment agreement, sighted the document established stipulates with terms of conditions of service such position, period of employment, types of work, responsibilities of employer, responsibilities of employee, salary payable, working hours, annual leave, sick leave, mutual termination of contract, facilities, deductions, overtime, holiday entitlement, maternity leave, and period of notice as per the Employment Act 1955 and the MAPA/NUPW collective agreement.</p> <p>During interview session, all sample workers show excellent understanding regards to their contract agreement. They claimed that they were briefed annually and received a copy of their contract agreement for reference purpose.</p> <p>Sample of workers details and information reviewed as below:</p> <p>Gajah Mati Estate</p> <p>Employee ID:</p> <ul style="list-style-type: none"> • GMXX02267 • GMXX02290 • GMXX02291 • GMXX02292 	Complied

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		<ul style="list-style-type: none">• GMXX02255• GMXX02556• GMXX02558• GMXX0017• GMXX0018• GMXX00056• GMXX01232• GMXX01357• GMXX02058• GMXX02557 <p>Kemaman POM</p> <p>Employee ID:</p> <ul style="list-style-type: none">• KMXX00294• KMXX00297• KMXX00298• KMXX093• KMXX00178• KMXX00131• KMXX00210• KMXX00141• KMXX00231	
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		<ul style="list-style-type: none">• KMXX00145• KMXX00258 <p>Air Putih Estate</p> <ul style="list-style-type: none">• APXX01244• APXX00872• APXX01103• APXX01148• APXX00714• APXX01340• APXX01611• APXX124• APXX01729• APXX301652• APXX01658• APXX01677• APXX00493• APXX165• APXX00649• APXX01732• APXX01727• APXX00741	
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		<p>Tebak Estate</p> <p>Employee ID:</p> <ul style="list-style-type: none">• 9704XX-02-XXXX• 9602XX-06-XXXX• 9304XX-02-XXXX• 9208XX-11-XXXX• 9103XX-02-XXXX• 8803XX-11-XXXX• 8207XX-02-XXXX• 8102XX-02-XXXX• 7806XX-03-XXXX• 6702XX-02-XXXX• 6610XX-03-XXXX• 9410XX-11-XXXX• 7210XX-02-XXXX• 7808XX-02-XXXX <p>Jernih Estate</p> <p>Employee ID:</p> <ul style="list-style-type: none">• JNXX035• JNXX218• JNXX00767	
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		<ul style="list-style-type: none"> • JNXX01030 • JNXX01032 • JNXX01048 • JNXX01032 • JNXX01048 • JNXX01053 • JNXX01066 • JNXX01067 • JNXX01076 • JNXX01078 	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Document review on sampled workers' employment agreement, sighted the document established stipulates with terms of conditions of service such position, period of employment, types of work, responsibilities of employer, responsibilities of employee, salary payable, working hours, annual leave, sick leave, mutual termination of contract, facilities, deductions, overtime, holiday entitlement, maternity leave, and period of notice as per the Employment Act 1955 and the MAPA/NUPW collective agreement</p> <p>Payroll documents were sampled for three months: January, April and July 2024. The payslips listed all details of daily-rated wages, piece-rated wages, payment for any overtime work done, public holiday pay, and salary deductions. Verification of punch card of each worker was carried out to confirm payment of overtime was made accordingly.</p> <p>Sample of workers details and information reviewed as below:</p>	Complied

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		<p>Gajah Mati Estate</p> <p>Employee ID:</p> <ul style="list-style-type: none">• GMXX02267• GMXX02290• GMXX02291• GMXX02292• GMXX02255• GMXX02556• GMXX02558• GMXX0017• GMXX0018• GMXX00056• GMXX01232• GMXX01357• GMXX02058• GMXX02557 <p>Kemaman POM</p> <p>Employee ID:</p> <ul style="list-style-type: none">• KMXX00294• KMXX00297• KMXX00298	
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		<ul style="list-style-type: none">• KMXX093• KMXX00178• KMXX00131• KMXX00210• KMXX00141• KMXX00231• KMXX00145• KMXX00258 <p>Air Putih Estate</p> <ul style="list-style-type: none">• APXX01244• APXX00872• APXX01103• APXX01148• APXX00714• APXX01340• APXX01611• APXX124• APXX01729• APXX301652• APXX01658• APXX01677	
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		<ul style="list-style-type: none">• APXX00493• APXX165• APXX00649• APXX01732• APXX01727• APXX00741 <p>Tebak Estate</p> <p>Employee ID:</p> <ul style="list-style-type: none">• 9704XX-02-XXXX• 9602XX-06-XXXX• 9304XX-02-XXXX• 9208XX-11-XXXX• 9103XX-02-XXXX• 8803XX-11-XXXX• 8207XX-02-XXXX• 8102XX-02-XXXX• 7806XX-03-XXXX• 6702XX-02-XXXX• 6610XX-03-XXXX• 9410XX-11-XXXX• 7210XX-02-XXXX	
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		<ul style="list-style-type: none"> • 7808XX-02-XXXX <p>Jernih Estate</p> <p>Employee ID:</p> <ul style="list-style-type: none"> • JNXX035 • JNXX218 • JNXX00767 • JNXX01030 • JNXX01032 • JNXX01048 • JNXX01032 • JNXX01048 • JNXX01053 • JNXX01066 • JNXX01067 • JNXX01076 • JNXX01078 	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Document review on sampled workers' employment agreement, sighted the document established stipulates with terms of conditions of service such salary and wages, type of work and location, working hours, sick leave, annual leave, termination of employment contract and employee insurance as per the Employment Act 1955 and the MAPA/NUPW collective agreement.</p>	Complied

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		<p>According to the interviewed workers, their working days are from Saturday to Thursday, with Friday designated as the rest day. Each operating unit provides 3 months of maternity leave to female workers, irrespective of their race, religion, or political affiliation. Annual and medical leave entitlements are based on the worker's length of service. Workers with less than 5 years of service are entitled to 14 days of sick leave and 8 days of annual leave.</p> <p>Sample payslips for workers from various roles, including mill operators, harvesters, field workers, and general workers, were reviewed. Overtime was found to be properly accounted for, and deductions were made fairly, in accordance with the agreement and approved by the Labour Department.</p> <p>Sample of workers details and information reviewed as below:</p> <p>Gajah Mati Estate</p> <p>Employee ID:</p> <ul style="list-style-type: none">• GMXX02267• GMXX02290• GMXX02291• GMXX02292• GMXX02255• GMXX02556• GMXX02558• GMXX0017• GMXX0018	
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		<ul style="list-style-type: none">• GMXX00056• GMXX01232• GMXX01357• GMXX02058• GMXX02557 <p>Kemaman POM</p> <p>Employee ID:</p> <ul style="list-style-type: none">• KMXX00294• KMXX00297• KMXX00298• KMXX093• KMXX00178• KMXX00131• KMXX00210• KMXX00141• KMXX00231• KMXX00145• KMXX00258 <p>Air Putih Estate</p> <ul style="list-style-type: none">• APXX01244• APXX00872	
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		<ul style="list-style-type: none">• APXX01103• APXX01148• APXX00714• APXX01340• APXX01611• APXX124• APXX01729• APXX301652• APXX01658• APXX01677• APXX00493• APXX165• APXX00649• APXX01732• APXX01727• APXX00741 <p>Tebak Estate</p> <p>Employee ID:</p> <ul style="list-style-type: none">• 9704XX-02-XXXX• 9602XX-06-XXXX• 9304XX-02-XXXX	
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		<ul style="list-style-type: none">• 9208XX-11-XXXX• 9103XX-02-XXXX• 8803XX-11-XXXX• 8207XX-02-XXXX• 8102XX-02-XXXX• 7806XX-03-XXXX• 6702XX-02-XXXX• 6610XX-03-XXXX• 9410XX-11-XXXX• 7210XX-02-XXXX• 7808XX-02-XXXX <p>Jernih Estate</p> <p>Employee ID:</p> <ul style="list-style-type: none">• JNXX035• JNXX218• JNXX00767• JNXX01030• JNXX01032• JNXX01048• JNXX01032• JNXX01048	
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		<ul style="list-style-type: none"> • JNXX01053 • JNXX01066 • JNXX01067 • JNXX01076 • JNXX01078 	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The management provides adequate living quarters with basic amenities to ensure the workers are comfortable doing their daily routine. Both local and foreign workers has been provided with housing, while foreign workers are accommodated in hostels at no charge. Water is supplied by Syarikat Air Terengganu (SATU), and electricity is provided by Tenaga Nasional Berhad (TNB), with a subsidy of RM5.00 per person for both water and electricity respectively for all workers residing in the estate/POM facilities.</p> <p>The estates offer a range of amenities for the residents' benefit, including a crèche, surau, football field, sundry shop, canteen, and clinics. The clinic, staffed by an Estate Health Assistant in addition to scheduled visiting medical officer to which both are responsible for health and wellbeing monitoring of all workers and residences, as recorded in the clinic's documentation.</p> <p>Weekly linesite inspections are carried out by Estate Health Assistant using the form and logbook. The inspection commonly will be verified by assistant manager and any follow up action will be monitored closely. Details of linesite inspection conducted as table below:</p>	Non-compliance

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		Estate/Mill	Date of inspection			
		Gajah Mati Estate	15/09/2024	09/09/2024	01/09/2024	
		Kemaman POM	19/09/2024	12/09/2024	05/09/2024	
		Air Putih Estate	22/09/2024	17/09/2024	10/09/2024	
		Tebak Estate	23/09/2024	16/09/2024	09/09/2024	
		Jernih Estate	23/09/2024	18/09/2024	03/09/2024	
		<p>Interviews with workers confirmed that there were no issues related to water and electricity payments or problems in the housing area. Any issues or damage in the housing and dormitory areas are addressed by management via Complaint Form established for action taken monitoring record.</p> <p>After reviewing the documents from Gajah Mati Estate and Air Putih Estate, it was confirmed that all checklist parameters were marked as being in good condition, with no observations requiring improvements noted. However, during the site inspection, it was noted that the actual conditions did not align with the inspection records. Issues such as broken windows, lubricant oil container, blocked water flow, damaged ceilings, a deteriorating garage structure, and the presence of empty chemical containers were observed.</p> <p>Thus, non-conformity is raised</p>				

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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>Each operating unit under the Kemaman POM & Supply Base Complex is responsible for monitoring prices at local sundry shops. They maintain a price list (Senarai Harga Barang) and compare prices with other shops to ensure affordability for the workers.</p> <p>Within Kemaman POM Complex, food is accessible through sundry shops and local eateries in the vicinity of the operating units, as well as in nearby towns reachable by public transport. Most of the sundry shops and local eateries are operated by the settlers. Transportation is provided by the operating units for migrant workers who need to travel to the nearest town for food supplies, free of charge. Requests for transportation services can be made at any time. Workers typically visit the town once a week, on Fridays (their weekly rest day), to buy their basic needs. This practice has been confirmed through interviews with sample employees.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p>	<p>TDM Plantation has established a decent living wage structure detailed in the document titled Prevailing & Decent Living Wages Calculation for Southern Region. This document calculates the prevailing living wage by including all in-kind benefits provided to the workers. The calculation was carried out by the Human Resource Department, Headquarters. Sampled the prevailing wages was calculated using parameters such as basic wages, service bonus, meals allowance, housing subsidy, medical cost, education and sports, welfare, communication allowance and transportation benefit of Housing. The prevailing wages exceed the Minimum Wage Order 2022, which is RM2,457.00 for both estate and mill.</p>	Complied

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	<p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
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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>Each operating unit under Kemaman POM and supply bases as Employee Master List which have information as below:</p> <ul style="list-style-type: none"> • Worker name • Worker ID • IC No./Passport No. • Birth Date • Citizenship • Gender • Vendor Name • Calling Visa • EPF No. and SOCSO No. • Date Arrival and Join <p>Each operating unit has appointed a contractor for mainly for machineries rental and CPO & PK transportation. Through documentation review, estates and mill has established a contract agreement between the contractors and describe the term and condition of the job awarded. Verification on the contract agreement found, the contract agreement is signed by both parties. There are no casual or temporary workers has been recruited by all operating units as verified in the master list of workers. Based on interview with sample of workers found they have good awareness on company policy was in order.</p>	Complied
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Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.									
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantation established their 'Freedom of Association Policy, dated 01/01/2022 as commitment to recognise freedom of association and right to collective bargaining among their employees and workers.</p> <p>Employees were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample latest minutes of meeting between management and workers representatives. The policy has been communicated to the workers through musters call/roll call as verified during the interview session with sampled workers during the audit.</p>	Complied						
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>It was confirmed that estate has representative of NUPW for Terengganu Branch. The branch has actively engaged with estates as committed effort to ensure welfare concerns and rights of the workers are acknowledged accordingly.</p> <p>Meanwhile, estates and mill also allow workers to appoint their representatives to voice out their concerns and rights with the estate management. Meeting was conducted regularly and evidence as table below:</p> <table><tr><td>Estate/Mill</td><td>Date of meeting</td></tr><tr><td>Gajah Mati Estate</td><td>15/04/2024</td></tr><tr><td>Kemaman POM</td><td>12/03/2024</td></tr></table>	Estate/Mill	Date of meeting	Gajah Mati Estate	15/04/2024	Kemaman POM	12/03/2024	Complied
Estate/Mill	Date of meeting								
Gajah Mati Estate	15/04/2024								
Kemaman POM	12/03/2024								

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		Air Putih Estate	12/08/2024		
		Tebak Estate	23/07/2024		
		Jernih Estate	27/08/2024		
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 -	The workers' representatives were chosen through an election conducted by the workers themselves. Prior to the election, the workers nominated their representatives commonly based on nationality. Once the election concluded which normally occurred during morning rollcall and the representatives were selected, management issued an appointment letter to the chosen individuals. It was further confirmed during interviews with all the workers' representatives and the workers that the election process was conducted freely, without any influence or interference from 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 -	TDM Plantation established and implemented their Protection of Children Policy and Social Policy, dated 23/02/2023, as evidence of their commitment to opposing the exploitation, utilization, and recruitment of child labor, particularly concerning individuals under the age of 16.			Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	Reviewed the master list in each operating units and interview session with samples, found that no young person was employed. All the workers are above 18 years old. It has been further confirmed during the interview with the workers. Kemaman POM and supply bases screened their workers' age using NRIC (for Malaysians) and passports (for non-Malaysians) in their			Complied

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		personnel files. No individuals under 18 were found working during the site visit, showing compliance with age-related employment regulations.															
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	It was confirmed that via reviewing the master list in each operating units and interview session with samples, found that no young person was employed.	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 -	<div>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired. Briefing on No Child Labor policy has been conducted regularly which includes contractor as table below:</div> <table><tr><th>Estate</th><th>Internal Stakeholder</th><th>External Stakeholder</th></tr><tr><td>Gajah Mati Estate</td><td>20/08/2024</td><td rowspan="5">28/08/2024</td></tr><tr><td>Kemaman POM</td><td>13/06/2024</td></tr><tr><td>Air Putih Estate</td><td>15/04/2024</td></tr><tr><td>Tebak Estate</td><td>12/05/2024</td></tr><tr><td>Jernih Estate</td><td>19/08/2024</td></tr></table> <div>Interview has been conducted with sample of workers consist of all level of workforce found they have good awareness on the policy of no child labour policy.</div>	Estate	Internal Stakeholder	External Stakeholder	Gajah Mati Estate	20/08/2024	28/08/2024	Kemaman POM	13/06/2024	Air Putih Estate	15/04/2024	Tebak Estate	12/05/2024	Jernih Estate	19/08/2024	Complied
Estate	Internal Stakeholder	External Stakeholder															
Gajah Mati Estate	20/08/2024	28/08/2024															
Kemaman POM	13/06/2024																
Air Putih Estate	15/04/2024																
Tebak Estate	12/05/2024																
Jernih Estate	19/08/2024																
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.																	

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6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantation has established Gender Policy, signed by new CEO dated 23/2023 which describes company commitment to prevent sexual and other forms of harassment. In addition, it also highlighting responsibility and legal obligation to maintain a workplace free of sexual harassment and aim to provide guidelines to estates and mills on the establishment and implementation of in-house mechanisms to prevent and eradicate sexual harassment in workplace. Briefing on the policy has been provided to all workforce where latest recorded as below:</p> <table><tr><th>Estate</th><th>Internal Stakeholder</th><th>External Stakeholder</th></tr><tr><td>Gajah Mati Estate</td><td>20/08/2024</td><td rowspan="5">28/08/2024</td></tr><tr><td>Kemaman POM</td><td>13/06/2024</td></tr><tr><td>Air Putih Estate</td><td>15/04/2024</td></tr><tr><td>Tebak Estate</td><td>12/05/2024</td></tr><tr><td>Jernih Estate</td><td>19/08/2024</td></tr></table> <p>Interview has been conducted with sample of workers consist of all level of workforce found they have good awareness on the policy of sexual harassment and all other forms of harassment and violence.</p>	Estate	Internal Stakeholder	External Stakeholder	Gajah Mati Estate	20/08/2024	28/08/2024	Kemaman POM	13/06/2024	Air Putih Estate	15/04/2024	Tebak Estate	12/05/2024	Jernih Estate	19/08/2024	Complied
Estate	Internal Stakeholder	External Stakeholder															
Gajah Mati Estate	20/08/2024	28/08/2024															
Kemaman POM	13/06/2024																
Air Putih Estate	15/04/2024																
Tebak Estate	12/05/2024																
Jernih Estate	19/08/2024																
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantation adopted Reproductive Rights Policy, along with the existing Social Policy which emphasizes company commitment to protect reproductive rights of all, especially for women in operations. The policy explicitly outlines the company's stance against interference in the reproductive planning of its workforce. It emphasizes the rights of workers to make decisions in this regard and underscores the company's commitment to avoiding</p>	Complied														

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		<p>discrimination and harsh treatment of workers based on their reproductive choices. Briefing on the policy has been provided to all workforce where latest recorded as below:</p> <table><tr><th>Estate</th><th>Internal Stakeholder</th><th>External Stakeholder</th></tr><tr><td>Gajah Mati Estate</td><td>20/08/2024</td><td rowspan="5">28/08/2024</td></tr><tr><td>Kemaman POM</td><td>13/06/2024</td></tr><tr><td>Air Putih Estate</td><td>15/04/2024</td></tr><tr><td>Tebak Estate</td><td>12/05/2024</td></tr><tr><td>Jernih Estate</td><td>19/08/2024</td></tr></table> <p>Onsite interviews with workers and gender committee members inform the reproductive rights policy is being implemented where they are not prevented from planning their family.</p>	Estate	Internal Stakeholder	External Stakeholder	Gajah Mati Estate	20/08/2024	28/08/2024	Kemaman POM	13/06/2024	Air Putih Estate	15/04/2024	Tebak Estate	12/05/2024	Jernih Estate	19/08/2024	
Estate	Internal Stakeholder	External Stakeholder															
Gajah Mati Estate	20/08/2024	28/08/2024															
Kemaman POM	13/06/2024																
Air Putih Estate	15/04/2024																
Tebak Estate	12/05/2024																
Jernih Estate	19/08/2024																
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>Kemaman POM and supply bases has conducted monthly and voluntarily health assessment for all their female workers. It was conducted by Health Assistant and one of the tests is pregnancy test. This proactive measure allows the company to gather valuable insights into the specific requirements and concerns of pregnant and lactating employees.</p> <p>During audit, it was found that one the female worker is pregnant in Tebak Estate and interview with the particular workers found that she was initially worked with chemicals and currently has been transferred to general work due to her pregnancy. She claimed that she eligible to request for time off for her pregnancy check up at her conveniences and further needs are updated accordingly.</p>	Complied														

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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>"Tatacara Aduan Gangguan Seksual" or the Complaint Process for Sexual Harassment is a process established by TDM Plantation respects anonymity and protects complainants when requested especially for sensitive issues regarding on sexual concerns. It is critical to maintain a safe and respectful workplace environment. The process outlines a clear procedure for reporting any cases or suspicious incidents of sexual harassment promptly.</p> <p>Interview session with gender committee and female workers confirmed that they are aware and understand on the SOPs and mechanism and claimed that there was no single case of sexual harassment has been recorded.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages <p>- Critical (Major) compliance -</p>	<p>After conducted interview with samples of workers, documents review and observation, it can be concluded that:</p> <ul style="list-style-type: none"> Retention of documents: Identity documents or passport are not retained unless necessary for passport or work permit renewal. Workers are free to keep their own identity documents and site verification at their house confirmed there is designated drawer for workers to keep their identity document safely. Charging of recruitment fee: No recruitment fees are imposed on workers, as per interview with sample workers, they claimed they have not incurred any recruitment fees. Involuntary overtime: Workers have the option to either accept or decline any overtime offers from their superiors. Based on their job requirements and positions, workers are informed by their supervisors or mandores. 	Complied

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		<ul style="list-style-type: none"> • Lack of freedom to resign: According to employment agreement of samples of workers, there are no specific terms and conditions outlined for resignations, and the operating units will bear the cost of flight tickets in such cases. • Debt bondage: Verification of pay slips of the samples of workers affirmed that there is no such evidence of debt bondage among the local and foreign workers. Workers claimed that there is no loan of money provided by the management especially during their early employment phase. Expenses from their hometown to the estate and mill are all covered by company hence there is no debt bondage implemented. • Withholding of wages: There is no evidence of wage withholding despite the management disburses workers' wages with cash system. Additionally, there is documented proof of payments signed by the workers and interview session confirmed the statement. 	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantation established and implemented Foreign Worker Policy, dated 23/02/2023 as evidence of commitment in promoting and protecting good social and human rights practices.</p> <p>Process such as recruitment of migrant workers shall adheres to relevant labor laws and regulations and specifically mentioned on compliance with the Employment Act 1955, Immigration Act 1959/63, and Compensation Workmen Act 1952.</p> <p>Samples of workers claimed that they are equally treated despite have different of position, nationality, and religion. No movement restriction has been enforced and identity documents are kept by themselves. They are also aware and acknowledged on terms and conditions stated in their employment contract.</p>	Complied

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		Documents review on the guideline include legalization of foreign workers, no contract substitution, no discrimination, payment of minimum wages, provision of post-arrival orientation on language, safety, laws, regulations.	
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The mill and estates manager has been appointed as person responsible for safety and health cum chairman for safety and health committee in respective operating unit.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee.</p> <p>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 matters arising, OSH objective and program, compliance to legal and requirement, Accident statistic and report, external and internal compliant, training and competency, workplace inspection report and other matters.</p> <p>For Kemaman POM, the mill manager has appointed the Compliance Executive as safety coordinator in the mill as per appointment letter dated 1/1/2018 signed by the mill manager. The safety coordinator has attended the training conducted by DOSH Terengganu as per certificate records of "Sijil Penyertaan Bengkel OSH-Coordinator" Sektor Perladangan Peringkat Negeri Terengganu Tahun 2021"; Date: 06-08/09/2021.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment latest appointment letter by the mill Manager dated on 31/12/2023. The</p>	Complied

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		<p>OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on matters arising, OSH objective and program, compliance to legal and requirement, Accident statistic and report, external and internal compliant, training and competency, workplace inspection report and other matters.</p> <p>For all sampled estates, the management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee. As sample in Air Putih Estate, the estate manager has appointed the Compliance Clerk as PIC for safety as per appointment letter dated 01/08/2021. The PIC has also attended DOSH Terengganu OSH Coordinator Training as per verified certificate i.e. "<i>Sijil Penyertaan Bengkel OSH-Coordinator</i>" Sektor Perladangan Peringkat Negeri Terengganu Tahun 2021"; Date: 06-08/09/2021.</p> <p>The management has established OSH Committee Member consist of Secretary, representatives from Employer and representatives from Employee. It was verified that the minutes of meeting of OSH committee available for meeting conducted timely in each quarter (Q) since Q4 2023 until latest Q3 2024 as per sample conducted on 19/08/2024, 15/05/2024, 14/02/2024 and 08/11/2023.</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>TDM Plantations has established the SOP for Accident and emergency procedures documented in the Standard Operating Procedure – Emergency Preparedness and Response edition TDM/01, rev. no. TDMP-02/2018 dated 1/1/2018. In the SOP, the emergency plan and ERT to be activated according to the emergency situations as following:</p> <ul style="list-style-type: none"> - Fig. 4.0 – Event of environmental and OSH emergencies including accident/incident 	Complied

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		<ul style="list-style-type: none"> - Fig. 4.4a – Event of fire - Fig. 4.4b – Event of Explosion - Fig. 4.4c – Event of Oil Spillage - Fig. 4.4d – Event of Effluent Spillage (mills). <p>The Emergency Response Plan Flow Chart has been displayed at strategic places in the mill and estates.</p> <p>The mill and estates visited has established Emergency response team. Training has been conducted regularly to ensure the awareness on the ERP. Sighted the training records of the ERP as per sample as following:</p> <ul style="list-style-type: none"> - Gajah Mati Estate: ERP for chemical spillage dated 27/1/2024 - Gajah Mati Estate: ERP for wild animal intrusion dated 4/2/2024 - Kemaman POM: First aid training dated 20/7/2024 - Kemaman POM: Fire drill and ERP training dated 29/6/2024 - Air Putih Estate: ERP for workplace accident dated 9/3/2024 - Tebak Estate: Firefighting management training dated 12/8/2024 - Jernih Estate: First aid training dated 11/1/2024 <p>Noted during interview with workers, the workers were aware regarding the location of firefighting equipment, first aid box and the competent first aider in the mill and estates.</p>	
6.7.3	(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine	The management provide appropriate PPE to the employee's base on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE issuance was recorded in ' <i>Borang</i>	Complied

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	<p>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><i>Penyerahan Peralatan kerja dan Pengambilan Barang' PPE</i> by individual basis. Verified PPE issuance records for sample employees as following:</p> <ul style="list-style-type: none"> - Gajah Mati Estate: Employee ID # MA1XXX396 (Safety helmet – Driver) - Gajah Mati Estate: Employee ID # MAXXX0403 (Safety boot – General worker) - Kemaman POM: Employee ID # KMXXX0200 (Leather glove – Workshop) - Kemaman POM: Employee ID # KM0XXX83 (Lab coat - Lab) - Air Putih Estate: Employee ID # APXXX1237 (Apron – Sprayer) - Air Putih Estate: Employee ID # APXXX1092 (Goggle – Manurer) 	
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>Local and foreign workers covered by SOCSO or Perkeso (<i>Pertubuhan Keselamatan Sosial</i>).</p> <p>For workers involved in accident and eligible for medical benefit from SOCSO, the claim form was submitted to SOCSO through '<i>Borang 34 – Butir Notis dan Tuntutan Faedah</i>'.</p> <p>Insurance cover in accordance with Malaysian mandatory law i.e. SOCSO Acknowledgement Contribution Received (ACR) verified as per sample as following:</p> <ul style="list-style-type: none"> - Gajah Mati Estate: For the month of May and June 2024 for a total of 58 and 55 workers dated 3/6/2024 and 4/7/2024 respectively. - Kemaman POM: For the month of July 2024 for a total of 107 workers dated 5/8/2024. 	Complied

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		<ul style="list-style-type: none"> - Air Putih Estate: For the month of February and March 2024 for a total of 329 and 332 workers dated 2/3/2024 and 4/4/2024 respectively. 	
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. JKKP 8 form were submitted to DOE through MyKKP systems to DOSH as following:</p> <ul style="list-style-type: none"> - Gajah Mati Estate: JKKP 8 # JKKP8/164267/2023 Date: 28/01/2024 - Gajah Mati Estate: JKKP 7 # TG/04/04/392; Date: 10/12/2023 - Gajah Mati Estate: JKKP 6 # TG/SKEM/24/01109; DOSH Reg. # TG/04/04/392; Date: 22/05/2024 - Kemaman POM: JKKP 8 # JKKP8/1/164885/2023 Date: 16/01/2024 - Kemaman POM: JKKP 6 # TG/SKEM/24/01152; DOSH Reg. # TGK0272; Date: 23/07/2024 - Air Putih Estate: JKKP 8 # JKKP8/150985/2023; Date: 22/01/2024 - Air Putih Estate: JKKP 6 # TG/SKEM/24/01147; DOSH Reg. # TGLS/PL/0407; Date: 18/07/2024 - Air Putih Estate: JKKP 7 # TG/SKES/24/00171; Date: 30/05/2024 - Air Putih Estate: JKKP 6 # TG/SKEM/24/01041; Date: 29/01/2024 - Tebak Estate: JKKP 8 # JKKP8/129183/2023; Date: 22/01/2024 	Complied

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		<p>- Tebak Estate: JKPP 7 # TG/SKES/24/00220; Date: 03/07/2024</p> <table> <tr> <th>Operating units</th><th>Occupational accident</th><th>Occupational disease</th><th>LTA days</th></tr> <tr> <td>Gajah Mati Estate</td><td>3</td><td>1</td><td>92</td></tr> <tr> <td>KPOM</td><td>2</td><td>4</td><td>18</td></tr> <tr> <td>Air Putih Estate</td><td>4</td><td>0</td><td>20</td></tr> <tr> <td>Tebak Estate</td><td>0</td><td>10</td><td>0</td></tr> <tr> <td>Jernih Estate</td><td>1</td><td>0</td><td>5</td></tr> </table>	Operating units	Occupational accident	Occupational disease	LTA days	Gajah Mati Estate	3	1	92	KPOM	2	4	18	Air Putih Estate	4	0	20	Tebak Estate	0	10	0	Jernih Estate	1	0	5	
Operating units	Occupational accident	Occupational disease	LTA days																								
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Jernih Estate	1	0	5																								
Principle 7: Protect, conserve and enhance ecosystems and the environment																											
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																											
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The estates has established Integrated Pest Management focusing on controlling the pest infestation such as rat. The effectiveness of IPM plan was implemented and monitored through rat damage and barn owl census every 6 month. Grading by mill on rat damage from FFB sent also indicates the effectiveness of IPM plan in the estate. Among the plan established as follows:</p> <ol style="list-style-type: none"> 1. Rat damage census 2. Rat baiting program 3. Barn owl census 4. Maintenance of barn owl box 5. Beneficial plant planting program 	Complied																								

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		<p>The estates conducted rat baiting campaign once every 6 months. Reviewed the latest records of rat baiting conducted in August 2024. Even though that barn owl has been placed as per ratio, Rat baiting was still required to ensure the rat damage was below than threshold level. The management also planned to increase the ratio of barn owl/ha in 2024.</p> <p>The estates planted beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, along the roadsides and designated points in the fields and also within the nursery perimeter. To develop beneficial plant nursery comprised of the beneficial plant.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the estates sampled. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no land preparation by burning ever since TDM practiced zero burning as per the policy in:</p> <p>a) TDM P01-SOP-Section 01/2011 - Under felling/clearing & land preparation</p> <p>b) Carbon Policy</p> <p>TDM has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, 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

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Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantation has established the Agrochemical Management Policy dated 1/7/2020 signed by the CEO.</p> <p>The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Standard Operating Procedure A12: Weeding –Immature, A13 – Mature, A14 – Lallang Eradication, rev. 2, May 2017.</p>	Complied
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides 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.</p> <p>Verified the records of pesticides usage per ha as per sample as following:</p> <ul style="list-style-type: none"> - Gajah Mati Estate 2023 a.i/ha: 0.96 - Gajah Mati Estate todate 2024 a.i/ha: 0.84 - Air Putih Estate 2023 a.i/ha: 0.96 - Air Putih Estate todate 2024 a.i/ha: 0.84 - Tebak Estate 2023 a.i/ha: 0.96 - Tebak Estate todate 2024 a.i/ha: 0.84 	Complied
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Standard Operating Procedure A12: Weeding –Immature, A13 – Mature, A14 – Lallang Eradication, rev. 2, May 2017.</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 -	As verified across all estates, there is evidence of prophylactic pesticide use, as recorded in the Chemicals Register maintained at each estate 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 -	Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III & IV chemical used at visited estates.	Complied
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out. - Critical (Major) compliance -	The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application. Verified relevant sampled training records as following: - Gajah Mati Estate: SOP for spraying training dated 18/2/2024 - Gajah Mati Estate: Agrochemical management policy training dated 23/3/2024 - Air Putih Estate: Chemical calibration training dated 1/7/2024	Complied

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		<ul style="list-style-type: none"> - Air Putih Estate: Chemical handling training dated 10/8/2024 - Tebak Estate: Use and Standard of Exposure Chemical Hazardous to Health) Regulations 2000 training dated 3/2/2024 - Tebak Estate: Safety briefing and SOP for Inter pump spraying equipment training dated 15/1/2024 - Jernih Estate: Safety data sheet training dated 20/2/2024 - Jernih Estate: SOP for rat baiting training dated 8/4/2024 	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. The estates also managed its pesticides as per SOP Chemical Management; Rev. # TDMP-02/2022; Date: 01/09/2022. The practice includes maintenance of Chemical Register as per sample Latest Register of Chemical Hazardous to Health update: 20/02/2024; DOSH Reg. # TGLS/PL/040/03 in Gajah Mati Estate.</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 estate maintained the inventory records of empty pesticides containers and recorded in scheduled Waste Recorded book. Sighted the records for FY 2024 to date.</p> <p>Empty pesticides containers were identified as scheduled waste in waste identification.</p> <p>All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors.</p> <p>Latest disposal was conducted on 27/8/2024 as per consignment note # 2024082715JWAUVN in Air Putih Estate.</p>	Complied

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7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	No evidence of aerial spray conducted at the estate visited.	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The annual medical surveillance was conducted on annually basis as per CHRA recommendation. The surveillance involved all employee exposed with chemicals as per sample as following:</p> <ul style="list-style-type: none"> - Gajah Mati Estate: Annual medical surveillance was conducted by OHD with reg. no. HQ/08/DOC/00/352 on 23/10/2023. All workers attended were declared fit to work in chemical handling. - Air Putih Estate: Annual medical surveillance was conducted by OHD with reg. no. HQ/08/DOC/00/601 on 16/6/2024. 14 workers were sent for surveillance and found fit to work as chemical handlers. - Tebak Estate: Annual medical surveillance was conducted by Dr. Aisam Bin Abu Bakar of Klinik Bestari Sdn. Bhd.; DOSH OHD reg. # HQ/08/DOC/00/352 on 14 - 15/05/2024. Result indicated all workers underwent surveillance found fit for chemical handling work - Jernih Estate: Annual medical surveillance was conducted by Dr. Aisam Bin Abu Bakar of Klinik Bestari Sdn. Bhd.; DOSH OHD reg. # HQ/08/DOC/00/352 on 29/07/2024. Result indicated all workers underwent surveillance found fit for chemical handling work 	Complied

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7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>An Internal Memorandum were distributed to all operating units by TDM Plantation HQ on prohibition of pregnant or breastfeeding women or other people that have medical restrictions to work as pesticides operator.</p> <p>The memorandum has been displayed at several information board in the estate and communicated to the workers during training and morning briefing.</p> <p>Noted during interview with the female workers, the understanding on the prohibition pregnant or breastfeeding women to work as chemical handlers is acceptable.</p>	Complied								
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.											
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>The estates and mill have identified the waste products and source pollution generated in the estates and mill. The waste are categorized as follows:</p> <p>Estates</p> <table><tr><th>Type</th><th>Item Description</th></tr><tr><td>Scheduled Waste</td><td>SW 102 – Waste of lead acid batteries SW 305 – spent lubricant SW 306 – spent hydraulic oil SW 410 – rags, plastics, papers, contaminated filters SW 404 – Clinical waste SW 409 – empty chemical containers</td></tr><tr><td>Domestic waste</td><td>Rubbish</td></tr><tr><td>Industrial waste</td><td>Scrap metal</td></tr></table>	Type	Item Description	Scheduled Waste	SW 102 – Waste of lead acid batteries SW 305 – spent lubricant SW 306 – spent hydraulic oil SW 410 – rags, plastics, papers, contaminated filters SW 404 – Clinical waste SW 409 – empty chemical containers	Domestic waste	Rubbish	Industrial waste	Scrap metal	Complied
Type	Item Description										
Scheduled Waste	SW 102 – Waste of lead acid batteries SW 305 – spent lubricant SW 306 – spent hydraulic oil SW 410 – rags, plastics, papers, contaminated filters SW 404 – Clinical waste SW 409 – empty chemical containers										
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		<p>Management of rags, plastics, papers or filters contaminated with SW</p> <p>Management of waste from production formulation, trade or use of pesticides, herbicides or biocides</p> <p>Management of domestic waste</p> <p>Management of domestic waste</p>	<p>Disposed of the item through licensed contractor as schedule waste</p> <p>Spillage of water used for chemical mixing to be collected in a sump and recycled for future chemical mixing</p> <p>Collect recycle waste and send to recycle center.</p> <p>Disposed via majlis and internal landfill</p>	
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>TDM Plantation has established SOP for handling scheduled waste and documented in Standard Operating procedure – Procedure for handling schedule waste dated 21/07/2024.</p> <p>The certification units also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estate visited and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>The certification units maintain the inventory records of the Scheduled Waste generated and reported to DOE through ESWISS.</p> <p>Waste disposal was conducted base on SOP and waste management plan established. Reviewed the implementation of the management plan as follows:</p>		Complied

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		<p>Awareness training on scheduled waste management has been conducted on the following dates:</p> <p>Gajah Mati Estate: 22/04/2024</p> <p>Kemaman POM: 25/06/2024</p> <p>Air Putih Estate: 13/02/2024</p> <p>Tebak Estate: 19/09/2024</p> <p>Jernih Estate: 07/05/2024</p> <p>Interviews with the person in charge and workers revealed that they have a good awareness of scheduled waste management practices.</p> <p>Record of Inventory of Schedule Waste and Disposal Record as per details below:</p> <p>Kemaman POM</p> <p>Inventory</p> <ul style="list-style-type: none"> • File reference Number: JAS.TKM.600-3/1/4 • Date Reporting: 22/09/2024 • Waste Generated: SW305, SW322, SW409 and SW410. <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 2024041715W4YUL5 • Date Disposal: 17/04/2024 • SW305 – Spent Lubricating Oil: 0.2500 MT by Pentas Flora (Kelantan) Sdn Bhd 	
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		<p>Gajah Mati Estate</p> <p>Inventory</p> <ul style="list-style-type: none"> • File reference Number: AS(B)T:31/152/000/023 • Date Reporting: 11/09/2024 • Waste Generated: SW305, SW306, SW404, SW408, SW409 and SW410. <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 20240630095039UM • Date Disposal: 30/06/2024 • SW305 – Spent Lubricating Oil: 0.0650 MT by Pentas Flora (Kelantan) Sdn Bhd <p>Air Putih Estate</p> <p>Inventory</p> <ul style="list-style-type: none"> • File reference Number: AS(B)T(KMN):11/123/000/011 • Date Reporting: 18/09/2024 • Waste Generated: SW305, SW306, SW404, SW408, SW409 and SW410. <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 2024091815UODELH • Date Disposal: 18/09/2024 	
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		<ul style="list-style-type: none"> SW305 – Spent Lubricating Oil: 0.2000 MT by Pentas Flora (Kelantan) Sdn Bhd <p>Tebak Estate</p> <p>Inventory</p> <ul style="list-style-type: none"> File reference Number: JAS.TKM.600-3/4/3 Date Reporting: 23/09/2024 Waste Generated: SW305, SW306, SW404, SW408, SW409 and SW410. <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 2024070310UZE15T Date Disposal: 03/07/2024 SW410 – Rags, plastic, papers or filter: 0.0020 MT by Pentas Flora (Kelantan) Sdn Bhd <p>Jernih Estate</p> <p>Inventory</p> <ul style="list-style-type: none"> File reference Number: JAS.TKM.600-3/4/5 Date Reporting: 23/09/2024 Waste Generated: SW305, SW409 and SW410. <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 20240923185KB4QE 	
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		<ul style="list-style-type: none"> • Date Disposal: 23/09/2024 • SW409 – Contaminated container: 0.0600 MT by Pentas Flora (Kelantan) Sdn Bhd 	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Domestic waste were collected twice a week and disposed at designated landfill. No evidence of fire use to dispose domestic waste at housing area.</p> <p>No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.</p>	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>Certification units continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</p> <p>a) Standard Operating Procedures (SOP) 2011</p> <p>b) "Guidelines On River Management"</p> <p>c) Pictorial Safety Standards and Security Guidelines (PSS).</p> <p>d) Laboratory Process Control Manual</p> <p>e) Security Guidelines</p> <p>f) SOP - Manuring 14 pages Rev 2017</p> <p>All the estates and mill operations were guided through the manuals and SOP. The procedures as documented in the manual and SOP</p>	Complied

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		were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The SOP included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. The aagronomic assessment and fertiliser recommendation was conducted by AAD (Agronomy and Advisory Department). Reviewed the leaf sampling records as follows:</p> <p>Gajah Mati Estate</p> <ul style="list-style-type: none"> • Latest leaf sampling conducted in 04/10/2023. Refer report no. LE/2023/10/331 dated 16/10/2023. Latest sampling conducted on 21/07/2024 and result were in progress. • Latest soil sampling conducted in 07/12/2023. Refer report no. SE/2023/12/160 dated 24/12/2023 <p>Air Putih Estate</p> <ul style="list-style-type: none"> • Latest leaf sampling conducted in 12/08/2024. Refer report no. FE/2024/08/1327 dated 19/08/2024. 	Complied

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		<ul style="list-style-type: none">• Latest soil sampling conducted in 29/11/2022. Refer report no. SE/2022/12/176 dated 12/12/2022. <p>Tebak Estate</p> <ul style="list-style-type: none">• Latest leaf sampling conducted in 07/08/2023. Refer report no. FE/2023/08/232 dated 17/08/2024.• Latest soil sampling conducted in 07/12/2023. Refer report no. SE/2023/12/156 dated 24/12/2023. <p>Jernih Estate</p> <ul style="list-style-type: none">• Latest leaf sampling conducted in 05/08/2024. Report was in progress.• Latest soil sampling conducted in 05/08/2024. Report was in progress.						
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The mill disposed EFB by send to neighbouring sister estate as nutrient recycle program. Reviewed the EFB disposal records FY 2024 as follows:</p> <p>The following practices are applied in the estates in relation to the nutrient recycling strategy;</p> <ol style="list-style-type: none">1. EFB application in designated fields at dosage of 40 mt/ha applied in inter rows subject to Agronomist recommendations.2. Cut frond are stacked in between the palm’s rows left to decompose. <p>The estate has established EFB and Bio-Compost application program FY 2024. Reviewed the application records as to date Apr 2024 as follows:</p> <table><tr><td>Estate</td><td>Jan</td><td>Feb</td><td>Mar</td><td>Apr</td></tr></table>	Estate	Jan	Feb	Mar	Apr	Complied
Estate	Jan	Feb	Mar	Apr				

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		<table><tr><td>Gajah Mati</td><td>276.44</td><td>205.19</td><td>198.38</td><td>110.57</td></tr><tr><td>Air Putih</td><td>161.77</td><td>577.42</td><td>254.29</td><td>41.28</td></tr><tr><td>Tebak</td><td>83.18</td><td>359.03</td><td>304.14</td><td>444.98</td></tr></table>	Gajah Mati	276.44	205.19	198.38	110.57	Air Putih	161.77	577.42	254.29	41.28	Tebak	83.18	359.03	304.14	444.98	
Gajah Mati	276.44	205.19	198.38	110.57														
Air Putih	161.77	577.42	254.29	41.28														
Tebak	83.18	359.03	304.14	444.98														
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. The fertiliser application records was available at the estate visited for review. The estate reported the fertilised application to Head Office on monthly basis through Monthly Report. Reviewed the Monthly Report for the month of August 2024.	Complied															
Criterion 7.5: Practices minimise and control erosion and degradation of soils.																		
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Soil maps were readily available at all estates, delineating the various soil series and their respective area percentages within the estate boundaries. Notably, there were no marginal or fragile soils identified across the assessed estates. There is no new oil palm plantings were initiated on steep terrain. This was verified through site visits, interviews, and document verification processes.	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 -	The commitment to protect and conserve biodiversity and ecosystems is articulated in Slope Protection and River Buffer Zone Policy, signed by the CEO on 01/04/2021, was found. Key points of the policy include: <ul style="list-style-type: none">Areas with slopes exceeding 25° must be excluded from any new planting development and replanting programs.For areas with slopes less than 25°, existing crops and vegetation should be properly maintained to ensure slope stability and prevent erosion.	Complied															

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7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting conducted at all estates visited as verified and sighted during site visit.	Complied																				
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.																							
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil series and topography maps were observed at the sampled estates, revealing no categorization of fragile soils within the sampled estates. During planning for replanting, the estate considered factors such as land terrain, drainage, and road systems. The table below illustrates the identified soil series for each estate: Gajah Mati Estate <table><tr><td>Soil series</td><td>Percentage, %</td></tr><tr><td>Siri Bungor</td><td>35.20</td></tr><tr><td>Kesatuan Batu Lapan-Padang Besar</td><td>2.73</td></tr><tr><td>Siri Batu Lapan</td><td>24.22</td></tr><tr><td>Siri Bukit Tuku</td><td>1.73</td></tr><tr><td>Chempaka</td><td>5.96</td></tr><tr><td>Kuala Brang</td><td>2.02</td></tr><tr><td>Kesatuan Lubuk Itik Binjai</td><td>12.11</td></tr><tr><td>Lubuk Itik</td><td>0.55</td></tr><tr><td>Lating</td><td>0.47</td></tr></table>	Soil series	Percentage, %	Siri Bungor	35.20	Kesatuan Batu Lapan-Padang Besar	2.73	Siri Batu Lapan	24.22	Siri Bukit Tuku	1.73	Chempaka	5.96	Kuala Brang	2.02	Kesatuan Lubuk Itik Binjai	12.11	Lubuk Itik	0.55	Lating	0.47	Complied
Soil series	Percentage, %																						
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		Rengam	14.35	
		Kesatuan Tebok Tawar	0.21	
		Telemong	0.45	
		Air Putih Estate		
		Soil series	Percentage, %	
		Awang	3.36	
		Bungor	27.71	
		Binjal	0.04	
		Batu lapan	0.65	
		Bukit Tuku	3.05	
		Chempaka	0.44	
		Tanah Terganggu	2.36	
		Gong Chenak	0.49	
		Gondang	0.02	
		Gali	0.02	
		Lubok Sendong	0.20	
		Lating	0.42	
		Penambang	0.18	

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		Renggam	56.84	
		Curam	4.51	
		Others	0.32	
		Tebak Estate		
		Soil series	Percentage, %	
		Awang	1.59	
		Bungor	20.82	
		Bukit Tuku	3.57	
		Gong Chenak	1.27	
		Penambang	3.85	
		Kesatuan Rengam Tai Tak	8.27	
		Rengam	57.57	
		Kompleks Aluvium	0.03	
		Steep Slopes	3.02	
		Tebak Estate		
		Soil series	Percentage, %	
		Awang	1.04	
		Bungor	30.08	

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		<table><tr><td>Bukit Tuku</td><td>3.17</td></tr><tr><td>Penambang</td><td>0.84</td></tr><tr><td>Rengam Tai Tak</td><td>15.98</td></tr><tr><td>Rengam</td><td>26.62</td></tr><tr><td>Steep</td><td>22.26</td></tr></table> <p>During verification through site visits, it was confirmed that the replanting did not involve planting on marginal or fragile soils.</p>	Bukit Tuku	3.17	Penambang	0.84	Rengam Tai Tak	15.98	Rengam	26.62	Steep	22.26								
Bukit Tuku	3.17																			
Penambang	0.84																			
Rengam Tai Tak	15.98																			
Rengam	26.62																			
Steep	22.26																			
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 -	Soil series and topography maps were available for the sampled estates, and no fragile soil was categorized within these estates. In planning for replanting, the estate considered factors such as land terrain, drainage, and road systems.	Complied																	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	<p>The Advisory and Agronomist Department carried out assessments and supplied the estates with topography maps. Below are the sampled topography details observed at the estates:</p> <table><tr><th rowspan="2">Degree</th><th colspan="2">Percentage, %</th></tr><tr><th>Gajah Mati</th><th>Air Putih Estate</th></tr><tr><td>0°-2° Flat</td><td>29.10</td><td>10.58</td></tr><tr><td>2°-6° Undulating</td><td>25.86</td><td>4.59</td></tr><tr><td>6°-12° Rolling</td><td>26.23</td><td>21.41</td></tr><tr><td>12°-20° Gentle Slope</td><td>15.18</td><td>55.43</td></tr></table>	Degree	Percentage, %		Gajah Mati	Air Putih Estate	0°-2° Flat	29.10	10.58	2°-6° Undulating	25.86	4.59	6°-12° Rolling	26.23	21.41	12°-20° Gentle Slope	15.18	55.43	Complied
Degree	Percentage, %																			
	Gajah Mati	Air Putih Estate																		
0°-2° Flat	29.10	10.58																		
2°-6° Undulating	25.86	4.59																		
6°-12° Rolling	26.23	21.41																		
12°-20° Gentle Slope	15.18	55.43																		

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		20°-25° Hilly	3.63	3.15	
		>25° Steep	0.00	4.51	
		Degree	Percentage, %		
			Tebak Estate	Jernih Estate	
		0°-2° Flat	8.30	5.05	
		2°-6° Undulating	36.36	9.06	
		6°-12° Rolling	43.03	59.88	
		12°-20° Gentle Slope	11.50	22.26	
		20°-25° Hilly	0.81	3.75	
		>25° Steep	0.00	0.00	
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.					
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Peat soil was not identified at any of the estates visited within TDM Kemaman POM Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.			Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE:	Peat soil was not identified at any of the estates visited within TDM Kemaman POM Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence			Not Applicable

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	<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>	of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	Peat soil was not identified at any of the estates visited within TDM Kemaman POM Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	Peat soil was not identified at any of the estates visited within TDM Kemaman POM Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	Not Applicable
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>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>	Peat soil was not identified at any of the estates visited within TDM Kemaman POM Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	Not Applicable

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	- Critical (Major) compliance -		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Peat soil was not identified at any of the estates visited within TDM Kemaman POM Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Peat soil was not identified at any of the estates visited within TDM Kemaman POM Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was 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>The sampled estates and mill have established Water Management Plans, which are reviewed annually. The primary objectives of these plans are to maintain water sources, ensure efficient water usage, and prevent contamination of surface and groundwater. Key initiatives implemented include:</p> <ul style="list-style-type: none"> • Rainwater harvesting at offices and workers' housing • Regular monitoring and identification of pipeline leaks • The water supply at workers' housing is provided by the state government. 	Complied

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		This plan aims to ensure efficient water management and conservation across the estates, addressing both quality and quantity concerns while promoting sustainable practices.													
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. Riparian buffer zones have been identified and demarcated. Signage has been placed. No chemicals and fertilizer application observed been used in their maintenance. In some areas Guatemala grass were planted along the riverbanks. Management of riparian zone is guided by Protection of Slope & River Buffer Zone Policy, dated 23/02/2023. The widths of the buffer zones are guided by the following measurements:</p> <table><tr><th>River width (meter)</th><th>Minimum width for river reserve (m) for peninsular Malaysia and Sarawak</th></tr><tr><td>1-5</td><td>5</td></tr><tr><td>5-10</td><td>10</td></tr><tr><td>10-20</td><td>20</td></tr><tr><td>20-40</td><td>40</td></tr><tr><td>>40</td><td>50</td></tr></table> <p>Buffer zone has been established and marked with white / blue paint. No evidence of chemical applications along the buffer zone. The river were desilt on annual basis by the Department Irrigation and Drainage. The estate conducted river water sampling on annually basis.</p>	River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak	1-5	5	5-10	10	10-20	20	20-40	40	>40	50	Complied
River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak														
1-5	5														
5-10	10														
10-20	20														
20-40	40														
>40	50														

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		<p><u>Gajah Mati Estate</u></p> <ul style="list-style-type: none"> • Date of report: 25/07/2024 • Report No: ERAKT/TDM/GJAHMATI/24/07-09 • Date Tested: 14/07/2024 • Conclusion: Generally, all parameters measured for the river quality monitoring programme were in compliance with the limit stated in Class IIA/IIB of National Water Quality Standards for Malaysia (NWQSM). <p><u>Kemaman POM</u></p> <p><u>Final Discharge</u></p> <ul style="list-style-type: none"> • Date of report: 15/09/2024 • Report No: 24/08/W0612 • Date Tested: 29/08/2024 <p><u>Inlet & Outlet</u></p> <ul style="list-style-type: none"> • Date of report: 14/07/2024 • Report No: 24/06/W0438 • Date Tested: 27/06/2024 <p><u>Air Putih Estate</u></p> <ul style="list-style-type: none"> • Date of report: 16/07/2024 • Report No: ERAKT/TDM/AIRPUTIH/24/07-05 • Date Tested: 03/07/2024 • Conclusion: Generally, all parameters measured for the river quality monitoring programme were in compliance with the limit 	
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		<p>stated in Class IIA/IIB of National Water Quality Standards for Malaysia (NWQSM).</p> <p><u>Tebak Estate</u></p> <ul style="list-style-type: none"> • Date of report: 16/07/2024 • Report No: ERAKT/TDM/TEBAK/24/07-07 • Date Tested: 03/07/2024 • Conclusion: Generally, all parameters measured for the river quality monitoring programme were in compliance with the limit stated in Class IIA/IIB of National Water Quality Standards for Malaysia (NWQSM). <p><u>Jernih Estate</u></p> <ul style="list-style-type: none"> • Date of report: 16/07/2024 • Report No: ERAKT/TDM/JERNIH/24/07-08 • Date Tested: 08/07/2024 • Conclusion: Generally, all parameters measured for the river quality monitoring programme were in compliance with the limit stated in Class IIA/IIB of National Water Quality Standards for Malaysia (NWQSM). 	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No overflow was observed, and flow meter reading was recorded daily.</p> <p>Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is quarterly monitored as per OER. Effluent Analysis</p>	Complied

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		conducted by accredited laboratory and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. Monthly analysis was done for final discharge point. Total of 8 parameters (pH, BOD3, COD, TS, SS, TN, AN and O&G) were tested. Latest 4 analysis report for 1 st , 2 nd , 3 rd 4 th Quarter quarters of year 2023 & 2024.																														
		<table><tr><th>Report Date</th><th>Quarter/Week</th><th>BOD (Limit=100mg/L)</th></tr><tr><td rowspan="3">14/07/2024</td><td>1stweek/1stmonth</td><td>20.00</td></tr><tr><td>5thweek/2ndMonth</td><td>38.00</td></tr><tr><td>9thweek/3rdMonth</td><td>28.00</td></tr><tr><td rowspan="3">09/04/2024</td><td>1stweek/1stmonth</td><td>9.00</td></tr><tr><td>5thweek/2ndMonth</td><td>20.00</td></tr><tr><td>9thweek/3rdMonth</td><td>28.00</td></tr><tr><td rowspan="3">14/01/2024</td><td>1stweek/1stmonth</td><td>44.00</td></tr><tr><td>5thweek/2ndMonth</td><td>20.00</td></tr><tr><td>9thweek/3rdMonth</td><td>34.00</td></tr><tr><td rowspan="2">11/10/2023</td><td>1stweek/1stmonth</td><td>29.00</td></tr><tr><td>5thweek/2ndMonth</td><td>40.00</td></tr></table>	Report Date	Quarter/Week	BOD (Limit=100mg/L)	14/07/2024	1 st week/1 st month	20.00	5 th week/2 nd Month	38.00	9 th week/3 rd Month	28.00	09/04/2024	1 st week/1 st month	9.00	5 th week/2 nd Month	20.00	9 th week/3 rd Month	28.00	14/01/2024	1 st week/1 st month	44.00	5 th week/2 nd Month	20.00	9 th week/3 rd Month	34.00	11/10/2023	1 st week/1 st month	29.00	5 th week/2 nd Month	40.00	
Report Date	Quarter/Week	BOD (Limit=100mg/L)																														
14/07/2024	1 st week/1 st month	20.00																														
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	5 th week/2 nd Month	20.00																														
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11/10/2023	1 st week/1 st month	29.00																														
	5 th week/2 nd Month	40.00																														

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		<table><tr><td></td><td>9thweek/3rdMonth</td><td>40.00</td></tr></table> <p>The discharge was through land application and there is no negative impacts recorded. Based on water sampling conducted showed there is no issue on contamination from the discharge.</p> <p>For EFB sighted Disposal Inventory Record submitted to DOE. Refer “Laporan Inventori Pelupusan Tandan Kosong Kelapa Sawit” for the month of August 2024.</p>		9 th week/3 rd Month	40.00						
	9 th week/3 rd Month	40.00									
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record TDM Kemaman POM. Average data as below:</p> <table><tr><td>Year</td><td>FFB Processed, MT</td><td>Water/L</td><td>Water/FFB</td></tr><tr><td>2023</td><td>173,129.33</td><td>3,576.50</td><td>2.03</td></tr></table>	Year	FFB Processed, MT	Water/L	Water/FFB	2023	173,129.33	3,576.50	2.03	Complied
Year	FFB Processed, MT	Water/L	Water/FFB								
2023	173,129.33	3,576.50	2.03								
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised											
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Management Plan 2024. The document was reviewed/updated on January 2022. Among the Energy Management Plan were:</p> <ul style="list-style-type: none">• Reduce the vehicle speed to 30km/j• Reduce the weightage and imit until 8 MT• Schedule maintenance in 3 month	Complied								

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		<p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <p>The mill and estate monitored the diesel usage per ton FFB process/production on monthly basis. Reviewed the data FY 2023 as follows:</p> <table> <tr> <th>Estate / Mill</th><th>Diesel, (MT)</th><th>FFB, (MT)</th><th>Diesel / FFB (MT)</th></tr> <tr> <td>Kemaman POM</td><td>303,498.00</td><td>173,129.33</td><td>1.75</td></tr> <tr> <td>Gajah Mati Estate</td><td>68,705.00</td><td>26,167.93</td><td>2.36</td></tr> <tr> <td>Air Putih Estate</td><td>176,121.00</td><td>48,315.76</td><td>4.45</td></tr> <tr> <td>Tebak Estate</td><td>59,389.00</td><td>21,522.59</td><td>2.75</td></tr> <tr> <td>Jernih Estate</td><td>76,123.00</td><td>23,265.21</td><td>3.27</td></tr> </table>	Estate / Mill	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)	Kemaman POM	303,498.00	173,129.33	1.75	Gajah Mati Estate	68,705.00	26,167.93	2.36	Air Putih Estate	176,121.00	48,315.76	4.45	Tebak Estate	59,389.00	21,522.59	2.75	Jernih Estate	76,123.00	23,265.21	3.27	
Estate / Mill	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)																								
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Tebak Estate	59,389.00	21,522.59	2.75																								
Jernih Estate	76,123.00	23,265.21	3.27																								
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.																											
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none"> • FFB record book • Stock book • Monthly stock issue 	Complied																								

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		<ul style="list-style-type: none">• Stock requisition note Mill• Mill Month End Production Report• Monthly production report• Flowmeter & running hours record book• Bio-gas generation daily monitoring log sheet• Effluent analysis report Based on the verification of records; all the sampled issuance was traceable					
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable				
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. Among the plan for pollution preventive action Plan FY 2024 for Mill and Estates were:</p> <table><tr><th>Objective</th><th>Action Plan</th></tr><tr><td>Prohibition of open burning in estate area</td><td>Any parts should not do any open burning activity in the estate area. Proper and clear signage should be installed and maintained</td></tr></table>	Objective	Action Plan	Prohibition of open burning in estate area	Any parts should not do any open burning activity in the estate area. Proper and clear signage should be installed and maintained	Complied
Objective	Action Plan						
Prohibition of open burning in estate area	Any parts should not do any open burning activity in the estate area. Proper and clear signage should be installed and maintained						

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		Expand uses of biodegradable material in estate activity	Biodegradable material of estate operation area being introduced to reduce the environmental impact from synthetic material uses.	
		Disposal of used chemical waste in schedule	Any empty chemical container is labelled with poisonous hazard sign and stored as schedule waste	
		Leakage of used engine oil and lubricant from workshop area	To construct oil containment sump at workshop area to contain any leakage	
		Leakage of chemicals at store area	To upgrade existing store to install oil containment sump and bunds in order to contain any leakages	
		High noise level from the exhaust blow pipe of boiler	To install silencer / muffler at the specified piping to reduce noise	
		Dangerous gases and fumes in the laboratory	To install LEV systems and exhaust fans in the laboratory rooms	
		Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.		

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		<p>As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports (Isokinetic Stack & Air Emission Monitoring Report):</p> <p><u>Year 2024</u></p> <ul style="list-style-type: none"> Report no.: L-GB-TC2405CTP-0312 Report date: 05/06/2024 Result: Dust: 36.30 mg/m³ (B5) vs limit 150, CO: 24.90 mg/m³ vs limit 1000 @ 12% CO₂ <p>For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring. Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored.</p> <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Compliance Licence.</p> <p>Environmental audit by 3rd party has been conducted annually by SFE Consultant Sdn Bhd dated 13/08/2024.</p> <p>Latest DOE visit was sighted on 09/09/2024. Refer DOE Visiting Book.</p>	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>During the site visit to the replanting area at the estate, there was no evidence of fire being used for land preparation. The felled oil palms were chipped and windrowed. The plantation enforces a strict no open-burning policy, and zero-burning practices were observed across all sampled estates. In the replanting area visited, no burning was evident, and all palms were felled, shredded, windrowed, and</p>	Complied

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		left to decompose naturally. Additionally, no fire was used for waste disposal.	
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>TDMP has implemented fire prevention and control measures, as outlined in its Standard Operating Procedure (SOP) for Emergency Preparedness and Response (Edition: TDM/01, Revision: TDMP-01/2018), dated 01/01/2018. The fire prevention plan is illustrated through the following procedural flowcharts:</p> <ul style="list-style-type: none"> • Fig. 4.4a – Emergency Response Plan in the Event of Fire • Fig. 4.4b – Emergency Response Plan in the Event of an Explosion <p>Emergency Preparedness and Response (Edition: TDM/01, Rev. TDMP-01/2018), is established and readily available. The fire prevention plan is similarly reflected in the flowcharts:</p> <ul style="list-style-type: none"> • Emergency Response Plan in the Event of Fire • Emergency Response Plan in the Event of an Explosion <p>Annual emergency drills are conducted to ensure preparedness in the event of an emergency. Additionally, emergency contact information for Bomba (911) is clearly posted and available should firefighting support be required by the estate.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>There is evidence that management has engaged with stakeholders regarding on fire prevention and control measures. Refer sample of matters stated details on Fire Prevention in the Stakeholder meeting dated 28/08/2024 combined session under TDM Kemaman POM. Interview conducted with sample of neighbouring smallholders found they have good awareness on fire prevention.</p>	Complied

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Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.				
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, this indicator is not applicable during this assessment. The immature areas are of replanted area.		Complied
7.12.2	<p>(C) 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>PROCEDURAL NOTE:</p> <p>Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>No land clearing has been carried out by the certification unit since 15/11/2018. However, TDMP Sdn. Bhd. conducted a reassessment of High Conservation Value (HCV) areas in mid-2022 across its three complexes: Kemaman, Bukit Besi, and Sungai Tong. This assessment was performed by a consultant, with reports dated 30/12/2022 available for verification. The primary goal of the reassessment was to reevaluate the presence of HCVs within the certification unit. The assessor’s recommendations were included in the report, and the certification unit has integrated them into its HCV management plans.</p> <p>For existing plantations with an HCV assessment by an RSPO-approved assessor and no new land clearing after 15 November 2018, the identified HCV areas are detailed in Table 4.1 (Identification and Analysis of HCV Presence Within the Study Area) of the latest HCV Assessment Report.</p>		Complied
	Biodiversity Area	HCV Status	Remarks	

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		<u>Pelantoh Estate</u>			
		Graveyard (Muslim)	HCV 6	Area of religious significant	The area needs to be protected due to religious aspect.
		Masjid Ladang Pelantoh North	HCV 6	Worship house	The area needs to be protected due to religious aspect.
		Surau - Pelantoh South Estate	HCV 6	Worship house	The area needs to be protected due to religious aspect.
		Sg. Tebak (2.77ha)	HCV 4	Erosion control	The area needs to be protected due to its important towards the hydrology and to minimize the impact on the soil erosion.
		<u>Tebak Estate</u>			
		River buffer zone	HCV 4	Erosion control	The area needs to be protected due to its important towards the hydrology and to minimize

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		Sg Tebak (3.69ha)			the impact on the soil erosion.
		Sg Mas (1.45ha)			
		Masjid Kampung Ladang Tebak	HCV 6	Worship house	The area needs to be protected due to religious aspect.
		<u>Jernih Estate</u>			
		HCV area 1 (69.23ha)	HCV 4	Slope >25°	The area needs to be protected due to its sloping area and its biodiversity.
		HCV area 2 (1.86ha)	HCV 4	Slope >25°	The area needs to be protected due to its sloping area and its biodiversity.
		HCV area 2 (1.86ha)	HCV 4	Border with Forest	The area needs to be protected due to its biodiversity. Based on evidence during the survey showed that the area is a wildlife roaming route.
		River buffer zone Sg. Mas	HCV 4	Erosion control	The area needs to be protected due to its important towards the hydrology and to minimize

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		(7.46ha)			the impact on the soil erosion.
		Masjid Sungei Mas	HCV 6	Worship house	The area needs to be protected due to religious aspect.
		Air Putih Estate			
		HCV Area 1	HCV 4	Slope >25°	Area needs to be protected due to its sloping area
		HCV Area 2 (47.77ha)	HCV 4	Slope >25°	Area needs to be protected due to its sloping area
		HCV Area 3 (51.89ha)	HCV 4	Slope >25°	Area needs to be protected due to its sloping area
		River buffer zone Sg. Paloh Jenang (25.31ha)	HCV 4	Erosion Control	Area needs to be protected due to its important to hydrology and minimize soil erosion.
			HCV 6	Worship house Masjid Ladang Air Putih	Area needs to be protected due to religious aspect.

		<u>Gajah Mati Estate</u>				
		"Kawasan Pemuliharaan Habitat" (Habitat Conservation Area) (62.02ha)	HCV 4	Area contains of flora and fauna	The area needs to be protected due to the sloping area and its biodiversity.	
			HCV 4	Slope >25°	This area is observed sloping at certain elevation. This area is potential to be developed for less than 25-degree slope.	
			HCV 4	Wildlife routes	According to the evidence during the survey, there were footprints of wildlife. Based on the camera trap installed at the site, it captured Sun Bear, Panther, Tapir and Wildboar.	
		Masjid Ladang Gajah Mati	HCV 6	Worship house	The area needs to be protected due to religious aspect.	
		<u>MAIDAM Estate</u>				
		HCV 2 area Border with forest area	HCV 4	Area contains of flora	The area needs to be protected due to its biodiversity.	

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		(3.99ha)		and fauna	Based on evidence during the survey conducted shows that the area is a wildlife roaming route.		
		Border with forest area	HCV 4	Area contains of flora and fauna	The area needs to be protected due to its biodiversity. Based on evidence during the survey conducted shows that the area is a wildlife roaming route.		
		HCV 1 area (1.21ha)	HCV 4	Slope >25°	Area needs to be protected due to its sloping area		
		River buffer zone Sg Angka (2.32ha)	HCV 4	Erosion Control	Area needs to be protected due to its important to hydrology and minimize soil erosion.		
		Surau Ladang MAI 1	HCV 6	Worship house	The area needs to be protected due to religious aspect.		
		The GIS AAD Department of TDM Plantation Sdn. Bhd. conducted the latest survey and mapping for each operating unit, which was completed in March 2023. The survey report clearly outlined the area (in hectares) of each HCV, and included detailed HCV location maps for all TDM estates. These maps were utilized as references by the audit team during the physical audit.					

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		Additionally, TDM reaffirmed that there was no loss or clearance of HCVs within the 2022-2024 period. The change in hectarage was based on the reassessment report, with TDM management strictly adhering to the figures provided by the HCV assessors.									
7.12.3	Indicator is not applicable in Malaysia context	Not applicable.	Not Applicable								
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>HCV management Plan has been done FY2024. Among the plan tabulated in the table below:</p> <table><tr><th>Objective</th><th>Action Plan</th></tr><tr><td>Establishment of Environmental Policy at Estate and Mill and announced to all staff and workers to ensure they understand on the requirement</td><td>Safety, Health and Environmental Policy has been sreated and all staff and workers are well briefed by compliance clerk. The policy also displayed at strategic location. Latest update on February 2023.</td></tr><tr><td>Sustainable protection of High Conservation Value in estate area</td><td>Any field or activity is prohibited in HCv area to sustain its authentic value. Reference HCV report. Monitoring every two month.</td></tr><tr><td>Education and awareness towards biodiversity conservation and management among estate community</td><td>Estate community shall be exposed to the knowledge of nature conservation which</td></tr></table>	Objective	Action Plan	Establishment of Environmental Policy at Estate and Mill and announced to all staff and workers to ensure they understand on the requirement	Safety, Health and Environmental Policy has been sreated and all staff and workers are well briefed by compliance clerk. The policy also displayed at strategic location. Latest update on February 2023.	Sustainable protection of High Conservation Value in estate area	Any field or activity is prohibited in HCv area to sustain its authentic value. Reference HCV report. Monitoring every two month.	Education and awareness towards biodiversity conservation and management among estate community	Estate community shall be exposed to the knowledge of nature conservation which	Complied
Objective	Action Plan										
Establishment of Environmental Policy at Estate and Mill and announced to all staff and workers to ensure they understand on the requirement	Safety, Health and Environmental Policy has been sreated and all staff and workers are well briefed by compliance clerk. The policy also displayed at strategic location. Latest update on February 2023.										
Sustainable protection of High Conservation Value in estate area	Any field or activity is prohibited in HCv area to sustain its authentic value. Reference HCV report. Monitoring every two month.										
Education and awareness towards biodiversity conservation and management among estate community	Estate community shall be exposed to the knowledge of nature conservation which										

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			includes the importance to sustain biodiversity	
		Set up HCV signage in estate area	Sign of "HCV area – No activity allowed within this area shall be put in the protected area to acknowledge workers to avoid any disruption to HCV area".	
		Initiative to maintain or enhance HCV area		
		Objective	Action Plan	
		Preservation of high slope area <25	Any plantation activity is not allowed in preserved area to let vegetation plant to grow and covered the slopy area.	
		Preservation of highly protected, rare, threatened, or endangered (RTE) Species	No hunting RTE species allowed in estate area. To develop safety procedure when encounter wildlife at field	
		Ensure the moderate extraction of natural resources	Responsible to take care of the natural forest in the estate area or estate border.	
		Ensure water quality and safety in estate area	Water sample of waterbodies in estate area will be analysed on its content to ensure no	

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		<table><tr><td></td><td>harmful chemicals released through estate discharged.</td></tr><tr><td>Identification of Riparian Reserved /buffer zone</td><td>Buffer zone will be marked on the Map. Width of the riverbank.</td></tr></table> <p>Training on HCV has been conducted as below:</p> <p>Gajah Mati Estate: 18/07/2024</p> <p>Air Putih Estate: 09/06/2024</p> <p>Tebak Estate: 18/09/2024</p> <p>Jernih Estate: 19/03/2024</p> <p>Sighted evidence of training material, attendance and photos. Based on interview with management and workers, they have good understanding on HCV matters.</p>		harmful chemicals released through estate discharged.	Identification of Riparian Reserved /buffer zone	Buffer zone will be marked on the Map. Width of the riverbank.	
	harmful chemicals released through estate discharged.						
Identification of Riparian Reserved /buffer zone	Buffer zone will be marked on the Map. Width of the riverbank.						
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	There were no rights of local communities identified to be present in HCV areas, HCS forest after 15/11/2018, peat land and other conservation areas. As verified in all estate there was no rights of local communities been identified in HCV areas, HCS forest after 15/11/2018, peat land and other conservation areas	Complied				
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working	Based on the biodiversity report, there was no RTE species found in all the estates. Nonetheless, the monitoring plan of wildlife was established and implemented. Education about the status of RTE has been given to workforce through a muster briefing from time to time. Signage to restrict hunting and intrusion have been put up at	Complied				

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	for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	many places at the estates especially at the points of entry to create awareness among the workers and surrounding communities.	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	Educational activities on RTE species were done through a few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of hunting or endangering the RTE species. Sighted the management also conducted the RTE monitoring. Refer HCV/Buffer / Conservation /RTE Monitoring report for the month of May and July 2024.	Complied
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	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 TDM Kemaman estates. There is no land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018. Hence, the requirement under this indicator does not apply.	Complied

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **Kemaman POM** and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	1.20	OER	20.33
PKO	0.00	KER	4.43

Production	t/yr	Land Use	Ha
FFB Process	172,889.33	OP Planted Area	28,447.44
CPO Produced	35,149.29	OP Planted on peat	0.00
PKO Produced	7,652.97	Conservation (forested)	73.44
		Conservation (non-forested)	204.03
		Total	28,724.91

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	179,164.70	1.04	0.00	0.00	0.00	0.00	179,164.70	1.04
CO ₂ Emission from fertilizer	17,896.76	0.10	0.00	0.00	0.00	0.00	17,896.76	0.10
NO ₂ Emission	7,864.00	0.05	0.00	0.00	0.00	0.00	7,864.00	0.05
Fuel Consumption	2,729.02	0.02	0.00	0.00	0.00	0.00	2,729.02	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-157,071.09	-0.91	0.00	0.00	0.00	0.00	-157,071.09	-0.91
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	50,583.39	1.78	0.00	0.00	0.00	0.00	50,583.39	1.78

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0.00	0.00
Fuel Consumption	946.89	0.01
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	946.89	0.01

Summary of Kernel Crusher Emission and Credit (if applicable)

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

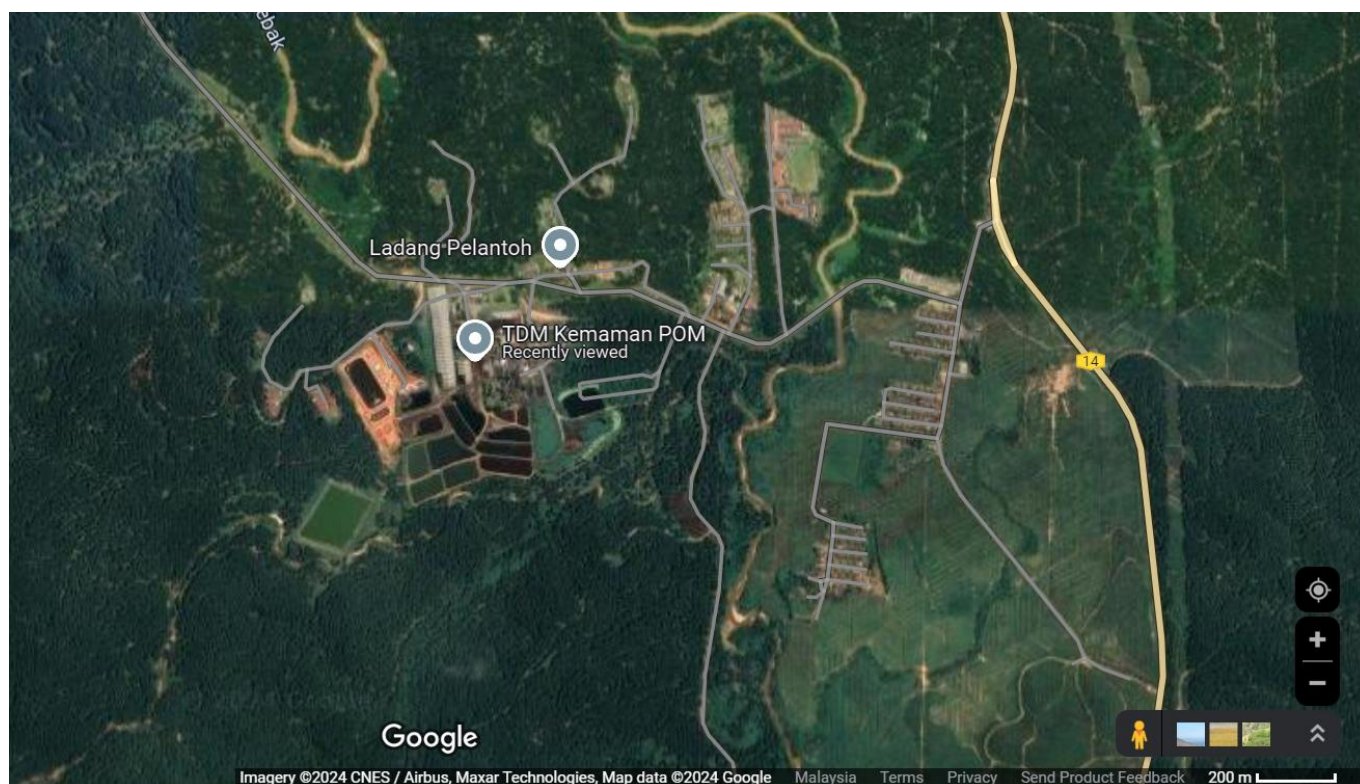
*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	9.25
Divert to anaerobic diversion (%)	90.75

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



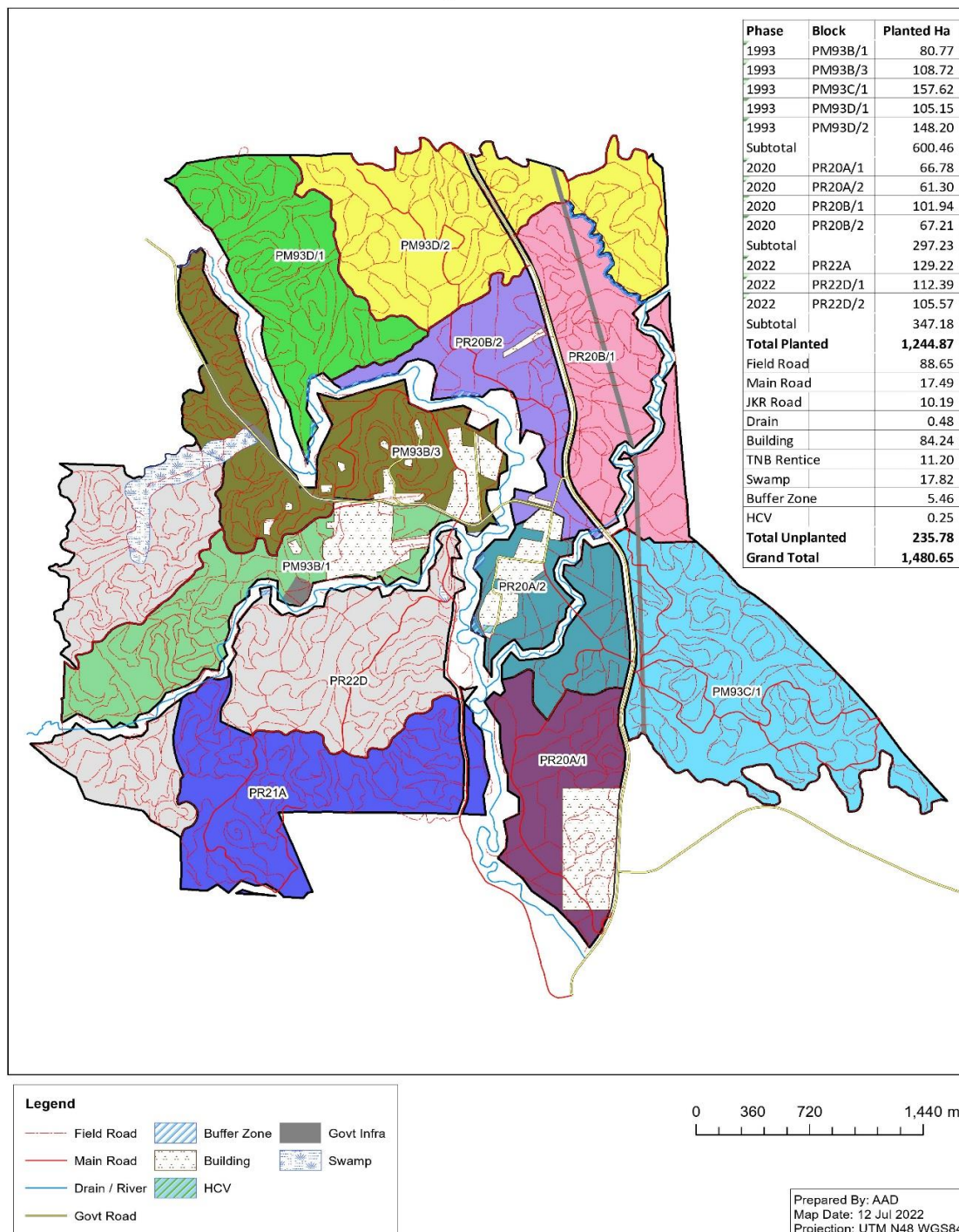
Appendix D: Estate Field Map

Pelantoh Estate



TDM PLANTATION SDN. BHD.
AGRONOMY & ADVISORY DEPARTMENT

Ladang Pelantoh North



Prepared By: AAD
Map Date: 12 Jul 2022
Projection: UTM N48 WGS84

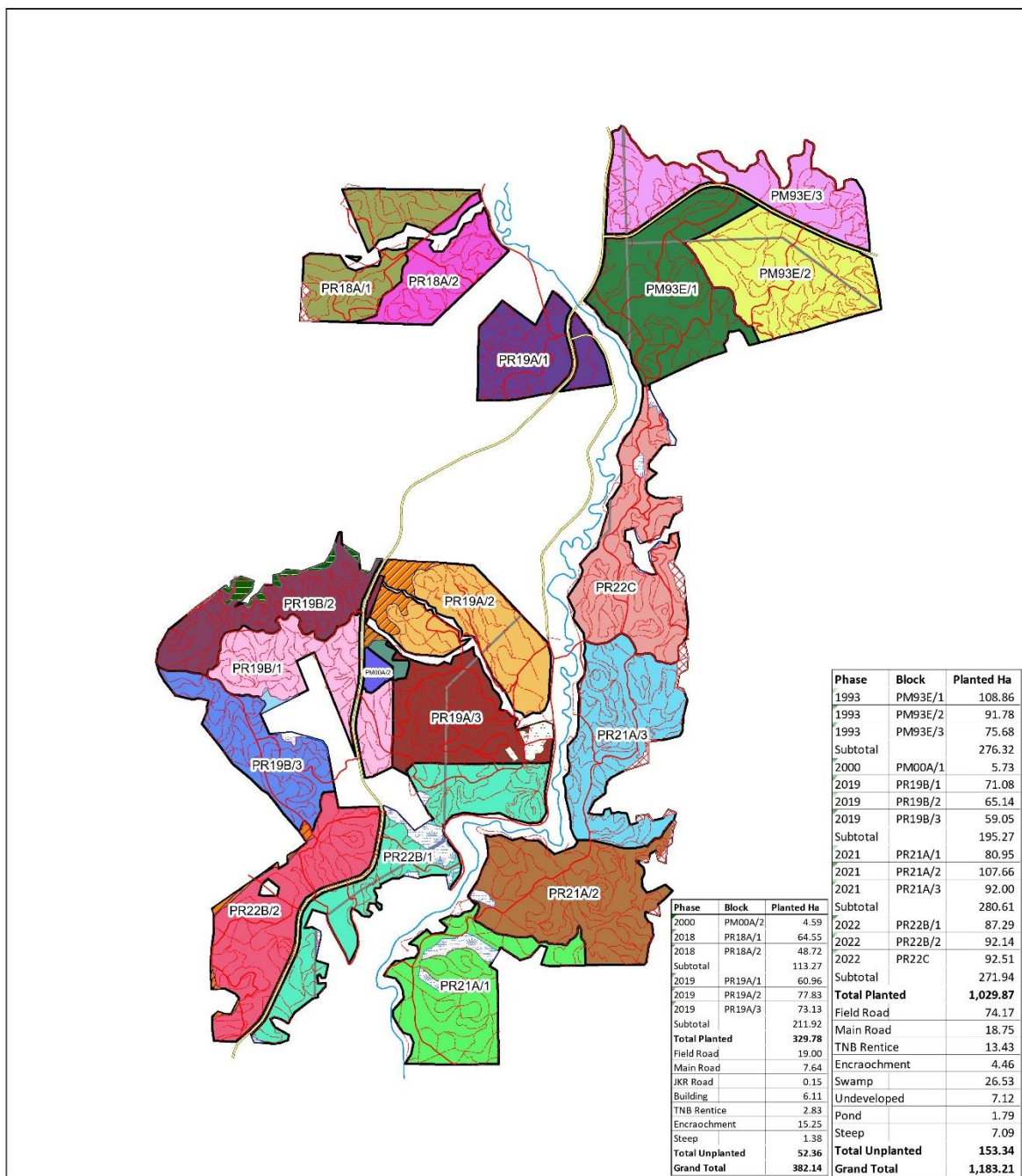
Pelantoh Estate



1:29,390

TDM PLANTATION SDN. BHD.
AGRONOMY & ADVISORY DEPARTMENT

Ladang Pelantoh South



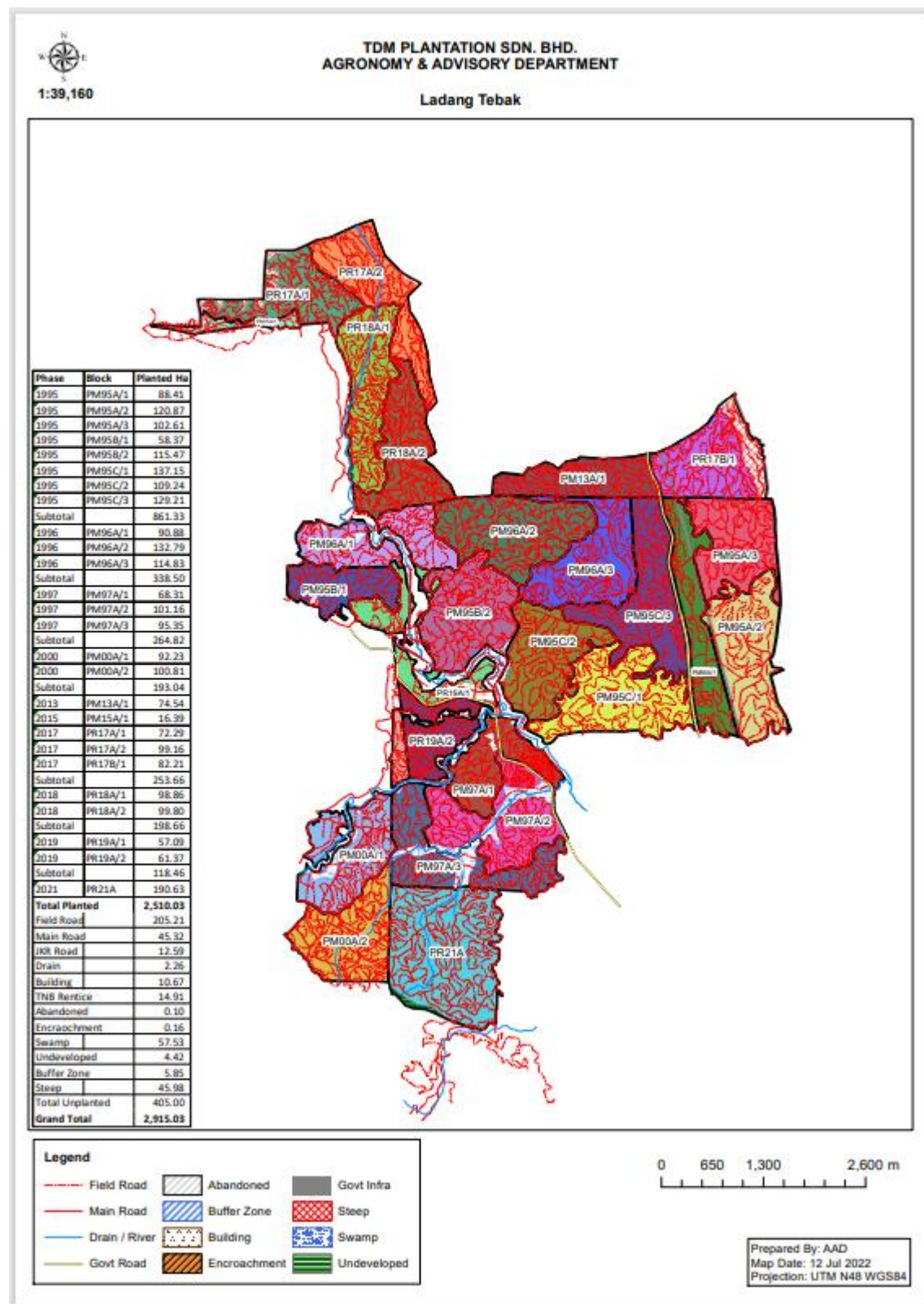
Field Road	Building	Steep
Main Road	Encroachment	Swamp
Drain / River	Govt Infra	Undeveloped
Govt Road	Pond	

Prepared By: AAD
Map Date: 12 Jul 2022
Projection: UTM N48 WGS84

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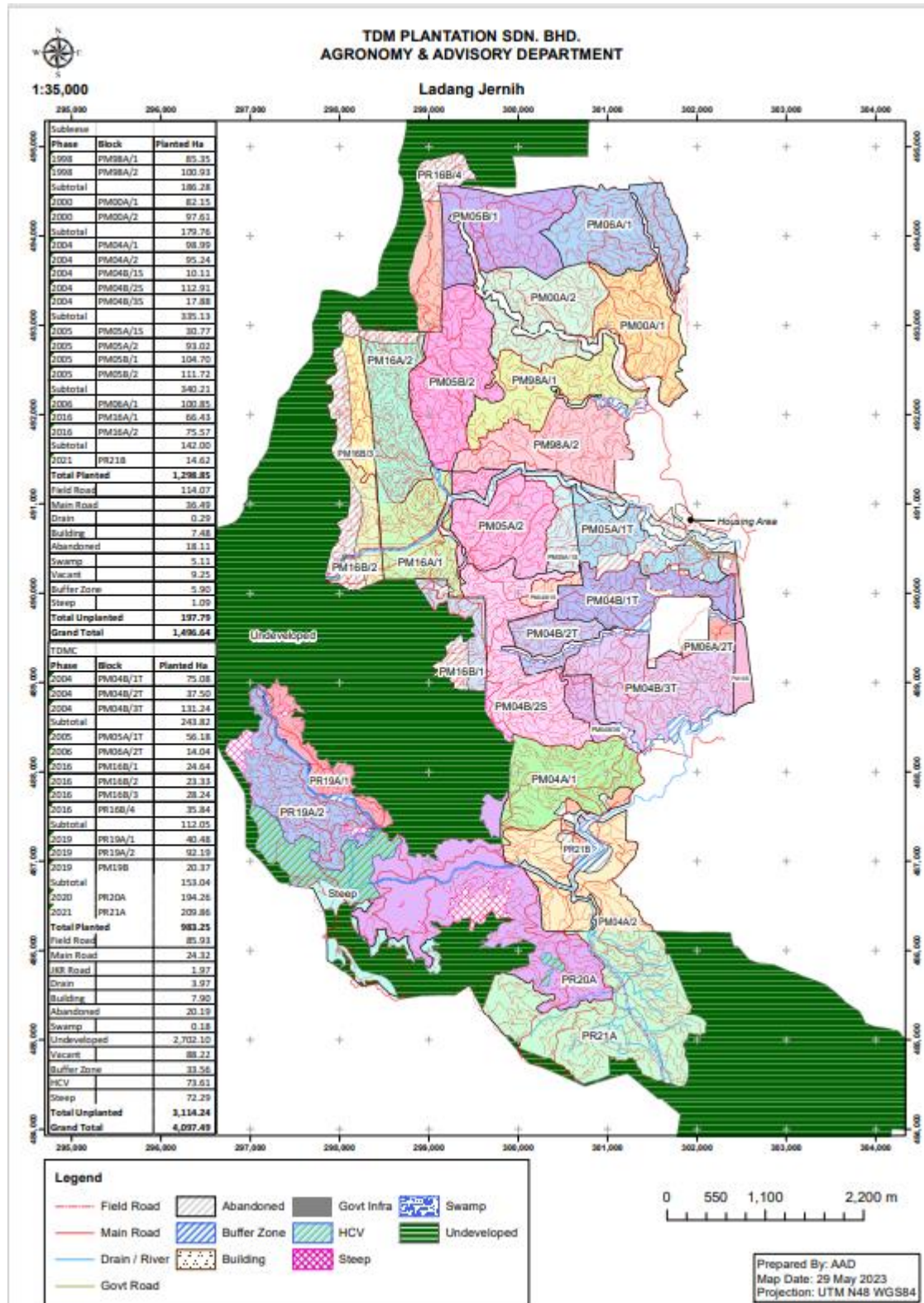
Tebak Estate



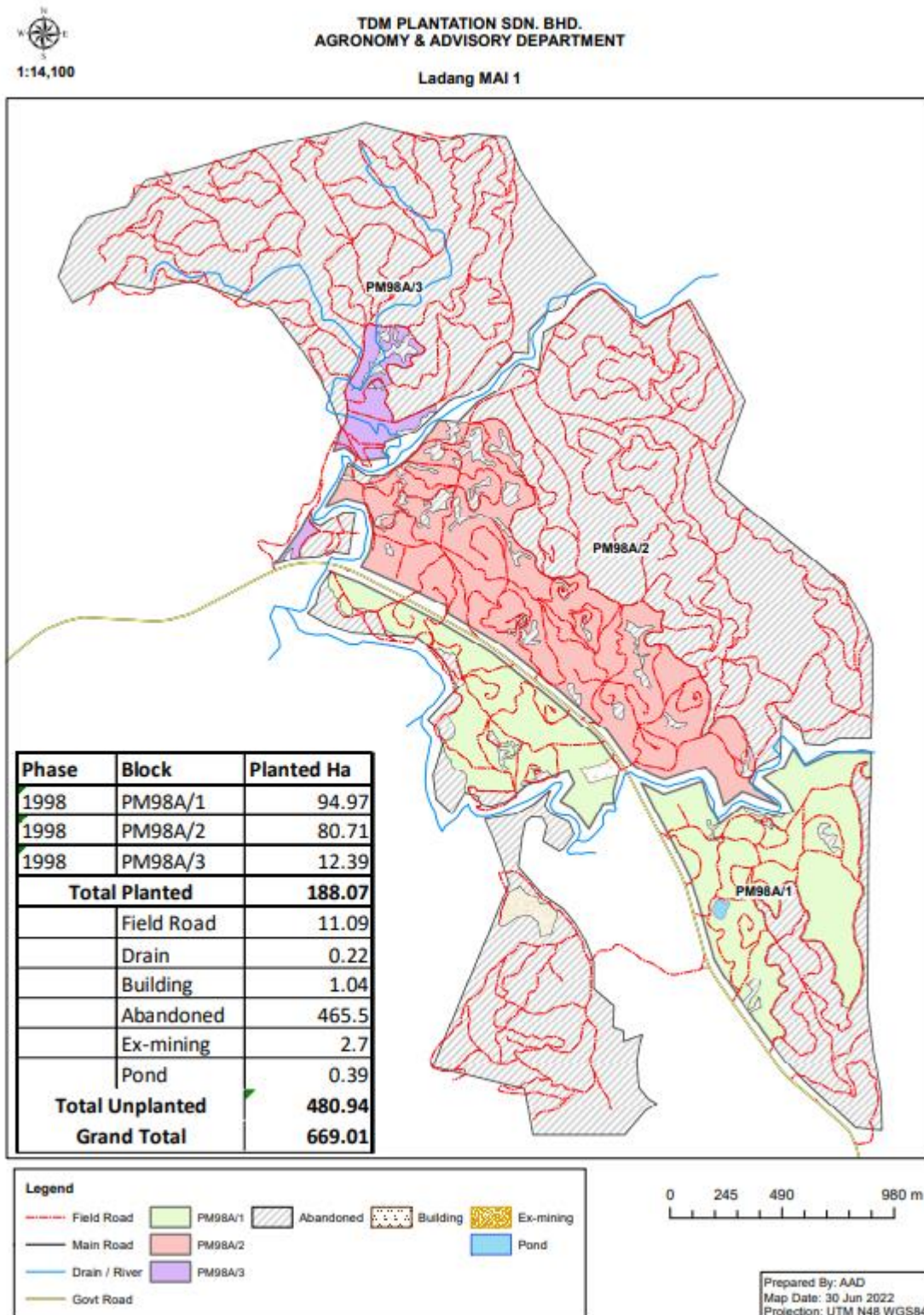
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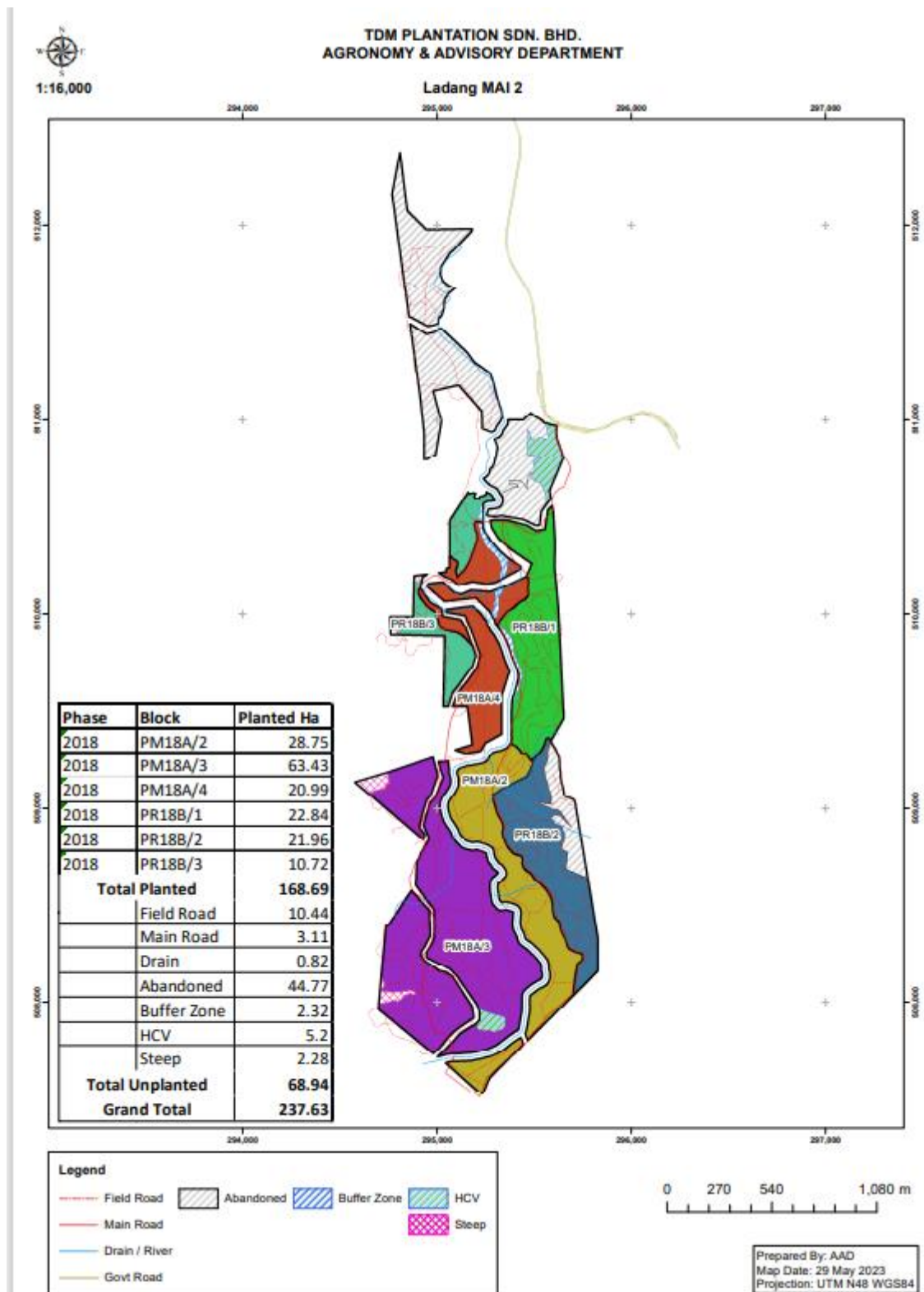
Jernih Estate



MAIDAM Estate



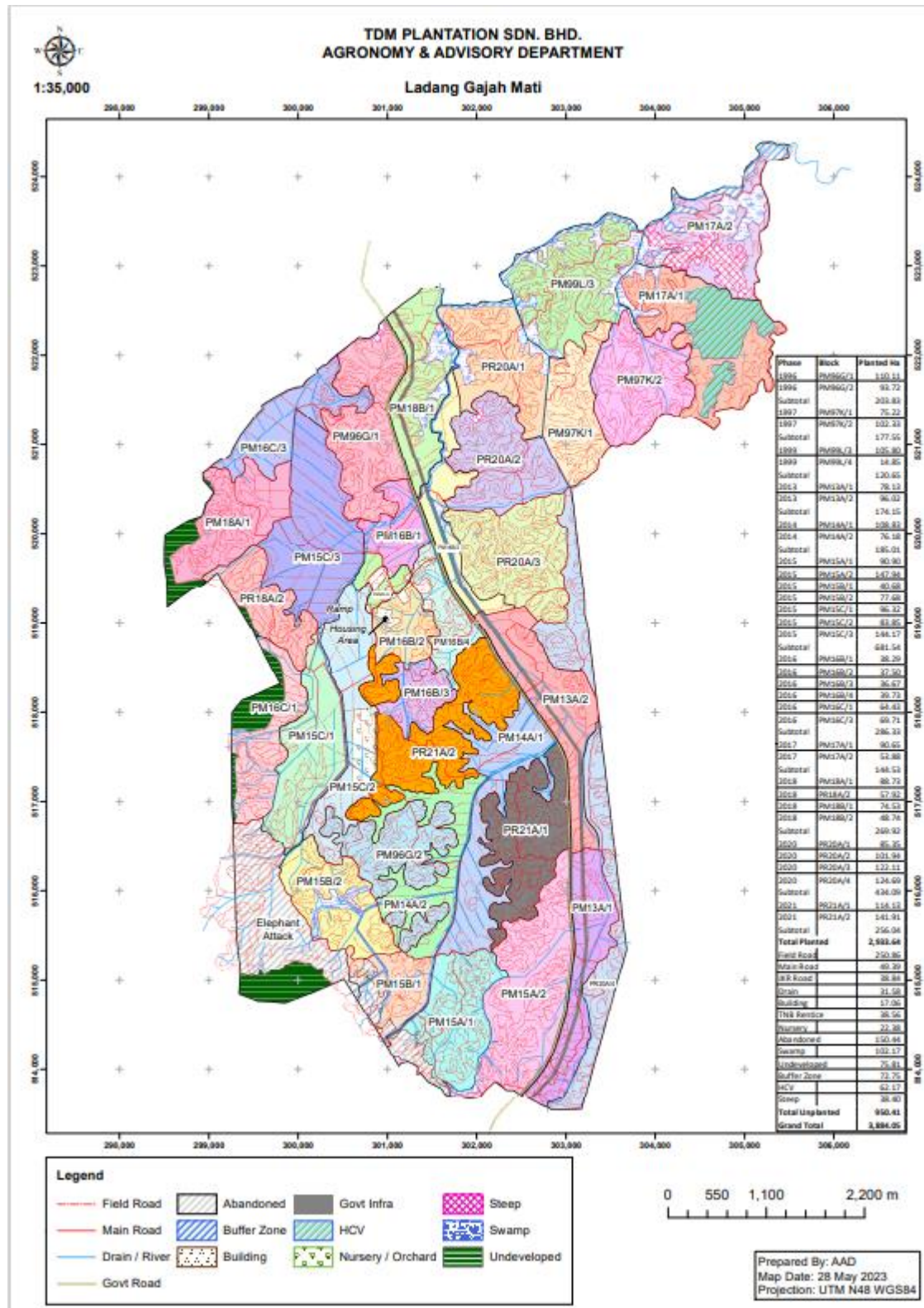
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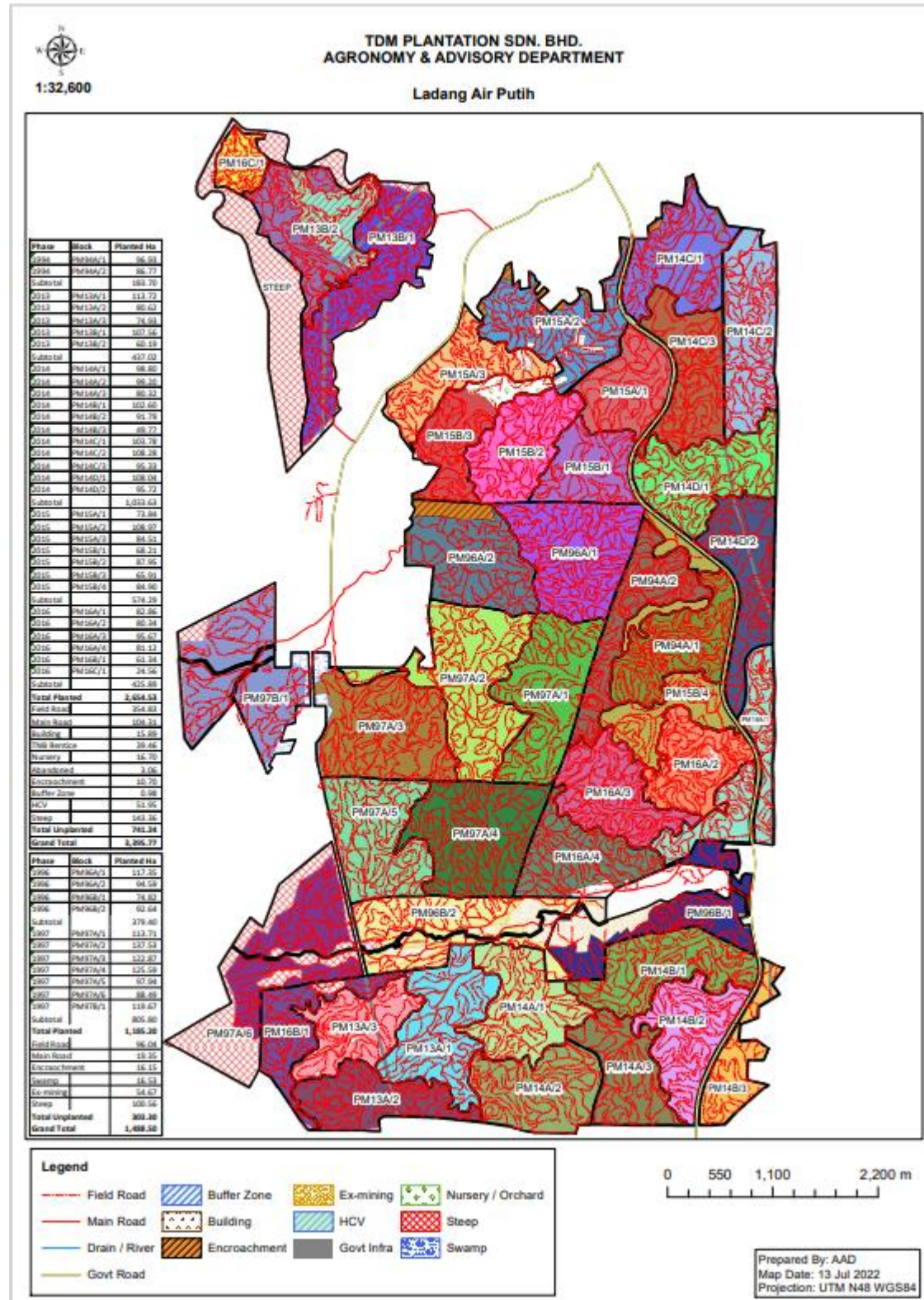
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Gajah Mati Estate



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Air Putih Estate



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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			

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
	N/A								
Total									

Note: * are smallholders sampled in this audit.

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Appendix F: List of Abbreviations

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