

**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, 443 D Jalan Kamaruddin, 20400 Kuala Terengganu, Terengganu, Malaysia
Certification Unit: Sungai Tong Palm Oil Mill Location of Certification Unit: Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu, Malaysia
Date of Final Report: 28/11/2024

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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, 443 D Jalan Kamaruddin, 20400 Kuala Terengganu, Terengganu, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Sungai Tong Palm Oil Mill		
Location / Address	Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu, Malaysia		
Website	www.tdmberhad.com.my		
Management Representative	Mohd Izwan Hafeez bin Che Azmi	E-mail	izwan.tdmp@tdmberhad.com.my
Telephone	+609-620 4800	Facsimile	+609-620 4803

2. Certification Information			
Certificate Number	RSPO 595564	Certificate Start Date	27/12/2023
Date of First Certification	27/12/2013	Certificate Expiry Date	26/12/2028
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 checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 mt/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 678754	MSPO Part 4 (MS 2530-4:2013) General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	26/12/2027
MSPO 686825	MSPO Part 3 (MS 2530-3:2013) General Principles for Oil Palm Plantations and Organized Smallholders		26/12/2027
MSPO 778500	MSPO Supply Chain Certification (MSPO-SCCS-01, 01-Sept-2018)		04/01/2028

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Sungai Tong Palm Oil Mill	Lot 7663, Batu 23, Jalan Kuala Terengganu Kota Bharu, 21500 Setiu, Terengganu, Malaysia	5° 18' 29.88" N	102° 54' 37.80" E
Jaya Estate	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5° 23' 43.61" N	102° 53' 03.32" E
Fikri Estate	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5° 19' 21.50" N	102° 53' 46.00" E
Tayor Estate	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5° 15' 58.00" N	102° 53' 26.00" E
Pelung Estate	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5° 16' 55.56" N	102° 49' 59.52" E
Jerangau Estate	Jalan Jerangau, 21810 Ajil, Hulu Terengganu, Terengganu, Malaysia	4° 57' 41.50" N	103° 09' 47.00" E
Pinang Emas Estate	Bukit Besi 23000 Dungun, Terengganu, Malaysia	4° 45' 39.96" N	103° 13' 25.68" 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
Jaya Estate	2,770.13	0.00	365.59	3,135.72	88.34

Fikri Estate	2,632.62	21.26	957.14	3,611.02	72.91
Tayor Estate	1,895.00	19.48	305.44	2,219.92	85.36
Pelung Estate	*1,085.89	19.54	*1,906.92	3,012.35	37.23
Jerangau Estate	1,330.74	0.00	150.18	1,480.92	89.86
Pinang Emas Estate	2,713.57	81.36	1,012.13	3,807.06	77.31
Total	12,427.95	141.64	4,697.40	17,266.99	71.98

Note:* Adjustment at Pelung Estate: A reduction in planted hectares and an increase in infrastructure and other areas were made following the latest GIS survey conducted in July 2023. The area, which is too steep to manage, was reclassified as unplanted and moved under the "Others" category.

6. Plantings & Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Jaya Estate	0.00	0.00	2,463.49	306.64	2,770.13	0.00
Fikri Estate	700.28	273.52	1,108.40	550.42	1,932.34	700.28
Tayor Estate	155.73	407.89	417.39	913.99	1,739.27	155.73
Pelung Estate	84.66	756.70	59.09	185.44	1,001.23	84.66
Jerangau Estate	404.04	926.70	0.00	0.00	926.70	404.04
Pinang Emas Estate	643.25	730.95	563.43	775.94	2,070.32	643.25
Total (ha)	1,987.96	3,095.76	4,611.80	2,732.43	10,439.99	1,987.96

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 (Jan 2024 – Dec 2024)	Actual (Nov 2023 – Sept 2024)		Forecast (Jan 2025 – Dec 2025)
		Previous license period (Nov 2023 – Dec 2023)	Current license period (Jan 2024 – Sept 2024)	
Jaya Estate	52,500.00	5,340.91	32,375.95	50,000.00
Fikri Estate	30,000.00	2,515.36	16,651.99	27,650.00
Tayor Estate	24,000.00	1,840.53	13,802.19	20,000.00
Pelung Estate	7,300.00	462.90	3,843.31	6,600.00
Jerangau Estate	5,000.00	0.00	598.27	5,000.00
Pinang Emas Estate	10,000.00	0.00	685.08	10,000.00
Total	128,800.00	78,116.49		119,250.00

Note: Low yield performance is attributed to rain interference and the monsoon season in the east coast region. In response, management has planned to reduce the land labor ratio for harvesters to catch up with the harvesting cycle and carry out rehabilitation for crop recovery. A significant portion of the area was affected by flooding, which disrupted harvesting operations.

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2024 – Dec 2024)	Actual (Nov 2023 – Sept 2024)		Forecast (Jan 2025 – Dec 2025)
		Previous license period (Nov 2023 – Dec 2023)	Current license period (Jan 2024 – Sept 2024)	
Gajah Mati Estate		0.00	1,193.15	
Maidam Estate		0.00	105.22	
Pelantoh Estate		0.00	815.43	
Tebak Estate		0.00	948.23	
Jernih Estate		0.00	908.61	
Air Putih Estate		0.00	1,576.92	
Total		5,547.56		

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 (Jan 2024 – Dec 2024)	Actual (Nov 2023 – Sept 2024)		Forecast (Jan 2025 – Dec 2025)
		Previous license period (Nov 2023 – Dec 2023)	Current license period (Jan 2024 – Sept 2024)	
NK Agriculture	0.00	1,548.89	34,125.76	0.00
Hadi Plantation				
Syarikat Wawasan				
Etc.				
Total	0.00	35,674.65		0.00

Note: Sample of non-certified supplier that sent their FFB to Sungai Tong POM. Data has been verified with Uncertified FFB Supplier Record Nov 2023 to Sept 2024 Sungai Tong POM. The details information has been verified as per requirement 2.3.1 and 2.3.2.

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	Nov 2023	10,159.70	1,548.89	11,708.59

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2	Dec 2023	0.00	0.00	0.00
3	Jan 2024	7,817.52	1,082.95	8,900.47
4	Feb 2024	3,453.14	511.07	3,964.21
5	Mar 2024	8,698.93	2,818.04	11,516.97
6	Apr 2024	9,541.21	2,867.26	12,408.47
7	May 2024	16,225.38	4,651.98	20,877.36
8	June 2024	7,721.91	4,534.14	12,256.05
9	July 2024	4,639.93	7,567.06	12,206.99
10	Aug 2024	8,067.36	5,480.91	13,548.27
11	Sept 2024	7,338.97	4,612.35	11,951.32
12	-	-	-	-
TOTAL		83,664.05	35,674.65	119,338.70

Note: Mill shutdown for the month of Dec 2023 for maintenance and inspection.

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

Estimated last year (Jan 2024 – Dec 2024)	Actual (Nov 2023 – Sept 2024)		Forecast (Jan 2025 – Dec 2025)
	Previous license period (Nov 2023 – Dec 2023)	Current license period (Jan 2024 – Sept 2024)	
FFB	FFB		FFB
128,800.00 mt	10,159.70 mt	73,504.35 mt	119,250.00 mt
	TOTAL	83,664.05 mt	
CPO (OER: 19.51%)	CPO (OER: 19.14%)		CPO (OER: 20.05%)
25,128.88 mt	1,931.93 mt	14,080.43 mt	23,909.63 mt
	TOTAL	16,012.36 mt	
PK (KER: 5.00%)	PK (KER: 4.45%)		PK (KER: 5.00%)
6,440.00 mt	462.01 mt	3,260.12 mt	5,962.50 mt
	TOTAL	3,722.13 mt	

Note: Mill shutdown for the month of Dec 2023 for maintenance and inspection.

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

No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Nov 2023	1,931.93	462.01
2	Dec 2023	0.00	0.00
3	Jan 2024	1,425.77	383.47
4	Feb 2024	640.74	170.82

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5	Mar 2024	1,648.03	417.88
6	Apr 2024	1,792.47	440.58
7	May 2024	3,307.57	662.22
8	June 2024	1,335.39	299.60
9	July 2024	976.46	229.04
10	Aug 2024	1,540.70	343.88
11	Sept 2024	1,413.30	312.63
12	-	-	-
TOTAL		16,012.36	3,722.13

Note: Mill shutdown for the month of Dec 2023 for maintenance and inspection.

11. Summary of Actual Volume sold

Current License period (Jan 2024 – Sept 2024)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	12,545.40	0.00	0.00	0.00	12,545.40
PK (MT)	3,016.37	0.00	0.00	0.00	3,016.37
Credits	0.00	0.00	0.00	0.00	0.00

Previous License period (Nov 2023 – Dec 2023)

CPO (MT)	2,094.19	0.00	0.00	0.00	2,094.19
PK (MT)	459.09	0.00	0.00	0.00	459.09
Credits	0.00	0.00	0.00	0.00	0.00

Note:

Conventional is RSPO certified material but sold as non-RSPO.

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	14,639.59	3,475.46
TOTAL			14,639.59	3,475.46

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)
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-	-	-	-	-
TOTAL			-	-
Note:				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
-	-	-	-
TOTAL		-	-
Note:			

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			-
Note:			

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (N/A)			Actual (N/A)			Forecast (N/A)		
	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						

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13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (N/A)							
Credits				-	-	-	-
Physical	-	-	-				
Previous License period (N/A)							
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.
Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639
Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
Website: www.bsigroup.com

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **13-17/10/2024**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **24/11/2024**. 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. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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

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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 (Re-certification 2)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Sungai Tong POM	✓	✓	✓	✓	✓
Jaya Estate	✓	-	✓	✓	-
Fikri Estate	✓	✓	-	✓	✓
Tayor Estate	-	✓	✓	-	✓
Pelung Estate	✓	-	✓	✓	-
Jerangau Estate	-	✓	✓	-	✓
Pinang Emas Estate	✓	✓	-	✓	✓

Tentative Date of Next Visit: October 15, 2025 - October 15, 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</p>

		<p>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 & 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>
<p>Mohd Razaleigh bin Mohamad (MRM)</p>	<p>Team Member</p>	<p>Education: He graduated Bachelor (Scs.) Plantations Management and Agrotechnology from Universiti Teknologi Mara (UiTM) in 2012.</p> <p>Work Experience: He gained his working exposure in the plantations sector, serving as Senior Assistant Manager with Tradewinds Plantations Berhad from 2012 until 2017 and has been doing audit for RSPO P&C, MSPO, since 2017 until now.</p> <p>Training attended: He has successfully completed ISO 9001:2015 (2020), ISO 14001:2015 (2017), ISO 45001:2018 (2021), Endorsed RSPO P&C Lead Auditor Course (2018), Endorsed MSPO P&C Lead Auditor Course (2017), Social Accountability SA8000 (2019), Endorsed RSPO Independent Smallholder (IHS), (2022), Training on the Application of Fundamental Principles and Rights at Work and Fair Recruitment by International Labour Organization (ILO), (2024), HCV and HCS Training (2024).</p> <p>Language proficiency: 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>
<p>Ahmad Rufi Abu Talib Khan (ARA)</p>	<p>Team Member</p>	<p>Education: Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015</p> <p>Work Experience: He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years' experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). Currently working as auditor for palm oil sustainability certifications.</p>

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		Training attended: He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course. Language proficiency: Bahasa Malaysia and English. Aspect covered in this audit: <input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
N/A	Technical Expert	Education: Work Experience: Training attended:
N/A	Translator	Education: Work Experience: Training attended:
N/A	Peer Reviewer	Education: Work Experience: Training attended:

Accompanying Persons:

Name	Role
N/A	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	NHA	MRM	ARK
Saturday 12/10/2024	-	Audit Team Travel to Kuala Terengganu	√	√	√

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Date	Time	Subjects	NHA	MRM	ARK
Sunday 13/10/2024 Pinang Emas	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	√	√	√
	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 14/10/2024 Sg Tong POM	0830 - 1230	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. Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc) Supply chain requirements for POM <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	√	√	√

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	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 15/10/2024 Jerangau Estate	0830 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc. Meeting with Stakeholder (Government, village rep., smallholders, Union Leader, contractor etc)	✓	✓	✓
	1230- 1330	Lunch Break	✓	✓	✓
	1330 – 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 16/10/2024 Fikri 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	✓	✓	✓

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Thursday 17/10/2024 Tayor 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	Audit team discussion & Closing Meeting	√	√	√
Friday 18/10/2024	-	Audit Team Travel back to KL	√	√	√

Major NC Close Out – Remote

Date	Time	Subjects	NHA
Saturday 23/11/2024	-	Auditor Travel to Hotel	√
Sunday 24/11/2024 Sg Tong POM Pinang Emas Estate Tayor Estate Fikri Estate	-	Auditor Travel to Site	√
	0900 - 1200	Soft Opening Meeting: <ul style="list-style-type: none"> Verification on previous Major NC: <ul style="list-style-type: none"> 2562609-202410-M1 2562609-202410-M2 2562609-202410-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 already been conducted it's HCV assessment by Sabarinah& Associates Sdn. Bhd.	Complied

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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	Complied

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	documented. Latest stakeholder meeting was conducted on 28/08/2024.	
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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			
	PELONG ESTATE	3,012.20	Certified		2013	1st July 2022	No			

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	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 Sdn Bhd, 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 of critical (3) Critical; Two of minor (2) Minor nonconformities and One of OFI Opportunity For Improvement raised. The TDM Sg Tong POM & Supply Bases Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment (not applicable for RSPO ISH standard/audit). 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 #	2562609-202410-M1	Issued Date	17/10/2024
Due Date	16/01/2024	Closure Date	24/11/2024
Indicator & Category (Critical / Minor)	3.4.3 Critical		
Statement of Nonconformity:	Social management plan has not been effectively implemented		
Requirement Reference:	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
Objective Evidence:	<p>Sg Tong POM</p> <p>Social impact assessment management plan has been established based on the response from the stakeholders. A sample of feedback from local operational workers has highlighted issues with the lack of basic amenities, such as fans, mattresses, wardrobes, and dining tables, for those residing in the older workers' quarters.</p> <p>Stated in the management plan that the management will review latest Minimum Housing Standard, to conduct census to get information on status of basic amenities, to established long term plan and to implement the management plan.</p> <p>As per interview with sample workers stay at the old workers quarters, there is no basic amenities for furniture has been provided and has been confirmed by the management. There is no census and long-term plan has been conducted and established.</p>		
Corrections:	To conduct a census on the basic amenities of workers living in old workers' quarters. Once the census is completed (according to their needs and request), the mill will seek approval from HQ on the allocation of amenities purchases, and the purchase of basic amenities will be performed in stages.		
Root Cause Analysis:	The census is carried out, but only for the staff who lived in the staff's quarters based on the list of furniture and equipment requirements together with the total value disseminated by Operation TDMP as per the memo dated 10 th January 2012. For the workers who stay in the new workers' quarters, the amenities are provided in order to get certificates of accommodation from the Department of Labour (DOL). While for the workers who stay at the old workers' quarters (substandard house), there are no guidelines on the list of basic amenities that must be provided		

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	by the mill. Mill only allocates the budget on the repair work of the workers' quarters.
Corrective Actions:	Under Project Teduhan 2, there will be construction of 24 units of worker's quarters for Sungai Tong Palm Oil Mill. This project is expected to begin in January 2025. 24 units of old workers' quarters will be transferred to the new quarters when the construction is completed and ready to be occupied. Kindly refer to TDM01_Project Teduhan 2 (24 unit) and Budget 2025-2030 (2028 - 24 unit and 2030 – 20 unit).
Assessment Conclusion:	Major NC Close Out 1. Census has been conducted by the management. Refer Census for Furniture and Workers Needs record 05/11/2024. 2. Refer Budget for fixed Asses 2025-2029 has been included of new quarters for Mill Sungai Tong and has been approved and will be commence on January 2025. 3. Interview was conducted with the management team confirmed the corrective action plan. Based on the above evidence, the major non-Conformity is closed effectively on 24/11/2024. Continuous implementation will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2562609-202410-M2	Issued Date	17/10/2024
Due Date	16/01/2024	Closure Date	24/11/2024
Indicator & Category (Critical / Minor)	6.7.3 Critical		
Statement of Nonconformity:	The implementation of using appropriate PPE is not fully effective		
Requirement Reference:	(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	<p>Pinang Emas Estate</p> <p>During a site visit at Field 1998A, Pinang Emas Estate, it was found that one worker was harvesting tall palms without wearing safety goggles. This does not follow the PPE Matrix for Pinang Emas Estate, which requires harvesters to wear safety goggles during harvesting.</p> <p>Tayor Estate</p> <p>During the site visit at Field 2020A2 for the spraying operation, workers were found to be spraying Ally. Referring to the CHRA recommendation for sprayers in the matured area, the recommended PPE is the 3M 3200 half-face respirator with a 3311K-55 cartridge. However, the workers were using N95 face masks.</p>		

Corrections:	<p>Pinang Emas Estate:</p> <p>The worker will be reminded to wear PPE, and management will inspect the PPE during muster call every morning. Those who fail to comply will receive a show-cause letter. Awareness training will be conducted.</p> <p>Tayor Estate:</p> <p>The sprayer workers were given a 3M 3200 half-face respirator with a 331K-55 cartridge, and the receipt records were recorded in the PPE issuance records.</p>
Root Cause Analysis:	<p>Pinang Emas Estate:</p> <p>The PPE SOP, issued by the Operation Department on 11th November 2021, applies to all staff and workers across TDM Plantation Sdn. Bhd.'s estates and mills. However, negligence in PPE usage persists among workers due to inadequate training and supervision by Field Assistant (FA).</p> <p>Tayor Estate:</p> <p>The Chemical Health Risk Assessment (CHRA) Report, issued on 8th March 2022, applies to all sprayers, foreman and storekeeper. However, PPE misuse among sprayers continue due to insufficient monitoring by the person-in-charge (PIC).</p>
Corrective Actions:	<p>Pinang Emas Estate:</p> <p>Field Assistant (FA) together with mandore will do proper supervision to make sure that all workers wear suitable PPE during work and follow the SOP. The training about the importance of wearing safety goggles had been conducted on 14th October 2024 with training evaluation.</p> <p>Tayor Estate:</p> <p>The training will be given to the PIC and sprayer workers in ensuring the right wearing of PPE and evaluation will be made, and the recommendation in the CHRA Report is followed.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Memo for PPE Inspection has been issued by Manager as per reference Memo LPE/OSH/24/01/1(7) dated 16/10/2024 for Mandore and Supervisor. 2. Training on Importance of PPE has been conducted on 20/10/2024 for Pinang Emas Estate and 22/10/2024 for Tayor Estate. Sighted evidence of Training material, attendance and photos. Sighted evidence of training evaluation has been made. 3. Training on CHRA Requirement also being conducted on 20/10/2024 at Tayor estate. Sighted evidence of Training material, attendance and photos. Sighted evidence of training evaluation has been made. 4. Site visit was conducted at Harvesting Gang and Spraying gang confirmed that PPE was use as per SOP, SDS and PPE Metrix. Interview conducted with sample workers found they have good understanding on importance of PPE. 5. Interview was conducted with the management team confirmed the corrective action plan. <p>Based on the above evidence, the major non-Conformity is closed effectively on 24/11/2024. Continuous implementation will be further verified in the next assessment.</p>

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Non-conformity			
NCR Ref #	2562609-202410-M3	Issued Date	17/10/2024
Due Date	16/01/2024	Closure Date	24/11/2024
Indicator & Category (Critical / Minor)	7.8.2 Critical		
Statement of Nonconformity:	Chemical activities have been observed in the Buffer Zone and High Conservation Value (HCV) area.		
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) 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.		
Objective Evidence:	<p>Pinang Emas Estate</p> <p>During the site visit at Pinang Emas Estate, chemical effects were observed in the buffer zone (Sungai Air Jernih) at Block P98A2 (within the marked buffer zone). An interview with the person in charge confirmed that the effects were due to spraying activities conducted in the area. Additionally, it was verified that spraying had been done for maintenance at the Old Graves (HCV – Kubur 3 Beranak) within the marked HCV area. These actions violated the management plan, which clearly states that "No spraying is allowed in CSA areas, Riparian Reserved areas, drain edges, and along the roads in HCV areas" and RSPO Manual on Best Management Practices (BMPs) for the Management and Rehabilitation of Riparian Reserves Section 1.2.1 Water Quality Protection and 1.2.4 Conservation Of Biodiversity Within Oil Palm Plantation Landscapes.</p> <p>Fikri Estate</p> <p>During the site visit at Fikri Estate (Sentosa Division), chemical effects were observed in the buffer zone (Sungai Lekar) at Block P99B1 (within the marked buffer zone). These actions violated the management plan, which clearly states that "No spraying is allowed in CSA areas, Riparian Reserved areas, drain edges, and along the roads in HCV areas" and RSPO Manual on Best Management Practices (BMPs) for the Management and Rehabilitation of Riparian Reserves Section 1.2.1 Water Quality Protection</p>		
Corrections:	<p>Pinang Emas Estate:</p> <p>The Field Assistant (FA) and mandore will monitor and guide workers during spraying, especially at the border of HCV areas and buffer zone.</p> <p>Fikri Estate:</p> <p>To install buffer zone signage near the waterways and riparian reserves (riparian buffer zone) marking will be marked along waterways.</p>		
Root Cause Analysis:	<p>Pinang Emas Estate:</p> <p>The worker didn't realize and noticed that he had crossed the border of marked areas while spraying due to lack of awareness and knowledge about HCV areas and buffer zone.</p> <p>Fikri Estate:</p>		

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	Lack of awareness among workers regarding the protection of riparian areas due to lack of proper training and guidelines from the estate.
Corrective Actions:	<p>Pinang Emas Estate:</p> <p>An awareness training will be conducted to ensure every worker, including sprayers, gains more knowledge and understanding of HCV areas and buffer zone, particularly regarding the boundaries of marked areas, to prevent the same mistakes from happening again.</p> <p>Fikri Estate:</p> <p>Workers will be retrained on how to avoid sources of pollution near the water's edge and briefed on the benefits of conserving natural riparian zones within the oil palm plantation, including water quality protection, riverbank stabilization, and biodiversity conservation. Prohibited activities will be monitored by the AM, FA and Compliance Clerk, and the inspection checklist, approved by the Manager, will be recorded.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Training on HCV and Buffer Zone has been conducted on 03/11/2024 for Pinang Emas Estate and 05/09/2024 for Fikri Estate. Sighted evidence of Training material, attendance and photos. Sighted evidence of training evaluation has been made. 2. Memo to Mandore and Supervisor to Monitor the Spray and manuring Activities at buffer Zone area has been issued by Manager dated 15/10/2024 with reference number LPE/ENV/24/01/1(3). 3. Inspection record has been updated for Monitoring of HCV and Buffer Zone Area. Sighted latest inspection being conducted on Sept 2024 and Oct 2024. The monitoring record has been verified by the Manager. 4. Site visit was conducted at HCV Area and Buffer Zone Area found no issue of chemical usage at that area. Interview conducted with sample workers found they have good understanding on prohibition of use of chemical at HCV and Buffer Zone Area. 5. Interview was conducted with the management team confirmed the corrective action plan. <p>Based on the above evidence, the major non-Conformity is closed effectively on 24/11/2024. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	2562609-202410-N1	Issued Date	17/10/2024
Due Date	Next Assessment	Closure Date	Next Assessment
Indicator & Category (Critical / Minor)	7.3.2 Minor		
Statement of Nonconformity:	The proper disposal of scheduled waste, in accordance with established procedures, was fully not demonstrated.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		

Objective Evidence:	Sg Tong POM During the site inspection at Sg Tong POM (Effluent Pond No. 8), a 200-liter empty drum (Brand Petronas) was found left unattended. Additionally, two 20-liter lubricant containers were being used for domestic purposes in the scrap iron area. This is not in compliance with SOP B9, Schedule Waste dated July 2024, Section 1.4.4, which states, "Safe and proper scheduled waste handling shall be practiced by all personnel who handle scheduled wastes to prevent injuries due to contact with scheduled waste or accidental spills, which may lead to environmental contamination."
Corrections:	200-liter empty drums and two 20-liter lubricants have been collected and moved into the scheduled waste store and been recorded in inventory for the month of October 2024.
Root Cause Analysis:	200-liter empty drums were found at the Effluent Pond belonged to the contractors who just finished conducting the desludging work, and two 20-liter lubricants belonged to the contractor who is currently involved in the boiler construction. This is happening due to a lack of information and in scheduled waste management.
Corrective Actions:	The training on scheduled waste management will be given to the contractors together with the safety induction/briefing prior to starting their work. The information will also be briefed to the staff and workers during the morning briefing on Monday morning.
Assessment Conclusion:	CAP has been accepted. The effectiveness of the implementation will be verified during next assessment.

Non-conformity			
NCR Ref #	2562609-202410-N2	Issued Date	17/10/2024
Due Date	Next Assessment	Closure Date	Next Assessment
Indicator & Category (Critical / Minor)	2.2.2 Minor		
Statement of Nonconformity:	The process of due diligence process to all contracted parties conducted is not fully effective.		
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:	Fikri Estate A verification of the employment contract between Sandemas Trading Sdn Bhd and its employees found that the contract content does not comply with requirements. Issues identified include the details such as the wrong employment location, working hours, termination notice period, seizure of employees' passports by the employer, and the immigration guarantee sum paid by employees, which is only returned after the contract ends. Although the management carried out a due-diligence process by reviewing employees' salary		

	slips, the issue with the employment contract was not detected. As a result, a Non-Conformance was raised.
Corrections:	An email about this matter was sent to Sandemas Trading Sdn Bhd on 23rd October 2024. Correction on the items that do not comply with the current act will be revised by Sandemas Trading Sdn Bhd accordingly.
Root Cause Analysis:	Sandemas Trading Sdn Bhd is a contractor for pruning and planting oil palm trees in Fikri Estate and their agreement ended on 30th September 2024. They were well notified and acknowledged about compliance with legal requirements based on our reminder letter on 21st August 2024 and an email on 26th August 2024. However, there were some acts they are not familiar with and did not update their employment contract in line with the current amendment.
Corrective Actions:	The employment contract for each of the contractors will be inspected by the Compliance Clerk and Assistant Manager (AM) to ensure compliance is met before management collaborates with any upcoming contractors.
Assessment Conclusion:	CAP has been accepted. The effectiveness of the implementation will be verified during next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	2562609-202410-I1 6.2.3 Directive from the management for Sungai Tong POM to pay the accommodation allowance (RM125/month) as per stated in the MAPA-NUPW collective agreement. Census has been done by the management to identify workers that eligible for the allowance and submitted to human resources department for approval. OFI has been raised to ensure that the allowance has been paid according to MAPA- NUPW collective agreement.

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 #	2418839-202311-M1	Issued Date	09/11/2023
Due Date	07/02/2024	Closure Date	30/01/2024
Indicator & Category (Critical / Minor)	Critical - 2.3.2		

Statement of Nonconformity:	The process of obtaining the information as per indicator 2.3.1 for indirect FFB supplier is not evident.																	
Requirement Reference:	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.																	
Objective Evidence:	Sighted the records of FFB supplier to the mill, form with the details regarding the information stated on 2.3.1 is available, however the information gathered from smallholders is not evident, since the volume of FFB/ha for suppliers is found to be not as industry standards (more then 25 mt FFB/ha). Thus, the Minor NC is escalated to Major NC																	
Corrections:	Immediately cease receiving FFB from the dealers, suppliers, or smallholders who cannot fulfil or provide the information required as per indicator 2.3.1.																	
Root Cause Analysis:	An official letter has been submitted to the dealers, suppliers and smallholders through email and WhatsApp in order to gather the information. However, the information given is insufficient and many of the suppliers were reluctant to provide the necessary documentation and information.																	
Corrective Actions:	To incorporate requirement indicator 2.3.1 into "Prosedur Operasi Standard Pembelian Buah Luar" for the purpose to ensure that dealers, suppliers, or smallholders fulfil the requirement.																	
Assessment Conclusion:	<div>1. The procedure on purchasing the external FFB was established, with title name Prosudur Operasi Standard Pembelian Buah Tandan Segar Luar dated 20/01/2024 with Reference Number: TDM/KILANG/03 – 01/2024. Verification on Indicator 2.6 found that the management has included the:</div> <div><div><div>• FFB Volume</div><div>• Location of Operation center</div><div>• MPOB License</div><div>• Company Registration Number</div><div>• Land Ownership status</div></div></div> <div>2. The management has ceased the external FFB suppliers from sending the FFB to the mill starting from second week of the November 2023. Records verified through FFB statement from the weighbridge system, which there are no FFB received for the month of December 2023 s the mill were due to major maintenance.</div> <div>3. As of 30/01/2024, the mill has received the external FFB from two suppliers name Federal Land Development (FELDA) and Kim Ma Oil Palm Sdn Bhd. Both records of FFB receiving were verified, and details as per the requirement stated in 2.3.1 was available for review. Thus, the Major Non Conformance was effectively closed.</div>																	
Effectiveness Closure (for previous audit closed Critical NC):	<div>Sample taken on the FFB Dealer for Hadi Plantation Sdn Bhd (FFB Dealer) with MPOB License No: 533468015000 , NK Agriculture Sdn Bhd MPOB License No: 619082015000 , Syarikat Warisan with MPOB License No: 505522115000 is as following.</div> <table><tr><td>No</td><td>MPOB License</td><td>Latitude</td><td>Longitude</td><td>Hectarage (ha)</td><td>Land No/Lot No</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>						No	MPOB License	Latitude	Longitude	Hectarage (ha)	Land No/Lot No						
No	MPOB License	Latitude	Longitude	Hectarage (ha)	Land No/Lot No													

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	Hadi Plantation Sdn Bhd					
	1	875706001011	5.308977	102.894245	3.8773	1615/498
	2	875706001011	5.275667	102.930279	1.392	3816/2767
	3	860563001011	5.284422	102.929513	2.718	3022/2763
	4	863459001011	5.271466	102.928761	0.4972	54/10824
	NK Agriculture Sdn Bhd					
	1	504469602000	4.8252778	103.266388	434.55	541
	2	504517002000	5.1286111	103.037500	911.88	3003
	Syarikat Warisan					
	1	905192001011	5.620275	102.488200	1.234	235
	2	801591001011	5.703960	102.559160	1.5149	32
	3	805196001011	5.513500	102.791700	2.6721	1141
	4	816218001011	5.672630	102.615260	0.6147	2771
	5	825001001011	5.711660	102.589740	0.8472	3654
	<p>It is verified that the management of TDM Plantation had issued the sales and purchase contract to each supplier that required the collection center to submit the details of each of their supplier as per the requirement in 2.3.1 that outlines the MPOB License, Land Legality, Coordinates and the FFB estimation. The management has established the procedure for outside crop purchase dated 31/01/2024 that has details the requirement of 2.3.2 into the process of sourcing the FFB. With the details process conducted at mill, the Major NC is remain closed.</p>					

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2418839-202311-M2	Issued Date	09/11/2023
Due Date	07/02/2024	Closure Date	30/01/2024
Indicator & Category (Critical / Minor)	Critical – 3.6.1		
Statement of Nonconformity:	The process of risk identification especially on the CHRA is not effectively implemented.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	Upon verification at each visited estate, the presence of the Chemical Hazard Risk Assessment (CHRA) was noted. However, after cross-referencing with the Chemical Register and inspecting the chemical store during the visit, it was identified that some chemicals and fertilizers listed in the register were not assessed in the CHRA. Consequently, a Major Non-Conformance (NC) has been raised.		

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	Normative Reference: Regulation 10, Occupational Safety And Health Act 1994 [Act 514] Occupational Safety And Health (Use And Standards Of Exposure Of Chemicals Hazardous To Health) Regulations 2000
Corrections:	A quotation for the renewal of the CHRA report has been requested from the qualified assessor and the assessment will be conducted as soon as possible.
Root Cause Analysis:	For Pelung Estate, the current CHRA report was issued on 25 November 2019. Boromag and Compound 38 were recently received in September 2023. Therefore, the fertilizer was not assessed yet in the CHRA Report. Fikri and Pinang Emas Estate is utilizing a different brand of pesticides and fertilizer, but the active ingredients are the same as listed in the CHRA report.
Corrective Actions:	The practices for updating the list of pesticides and fertilizer in the CHRA report will be continuously conducted and monitored by the Assistant Manager together with the Compliance Clerk. Any new pesticides and fertilizers will be informed of and discussed in the Safety and Health Committee (SHC) meeting.
Assessment Conclusion:	<p>Jaya Estate –</p> <p>The management conducted the CHRA on 15/01/2024, verified photos, attendance records, and Purchase Order LJY111/23. Dr Liwauddin Bin Mohamad (DOSH Registration No: HQ/12/ASS/00/306) conducted the assessment. The report was verified with Reference Number: HQ/12/ASS/00/306-2024/0003. CHRA and Chemical Register issues were discussed during the safety meeting on 10/12/2023.</p> <p>Pinang Emas Estate –</p> <p>The CHRA on 02/01/2024 was verified with photos, attendance records, and Acceptance Letter dated 05/12/2023 (Ref No: LPE/CHRA/23/01/1(1)). Dr Yasriza Yahaya (DOSH Registration No: HQ/10/ASS/00/8) conducted the assessment. The report was verified with Reference Number: HQ/10/ASS/00/8/2024/001. CHRA and Chemical Register issues were discussed during the safety meeting on 20/12/2023.</p> <p>Pelung Estate –</p> <p>The CHRA from 19/12/2023 to 25/01/2024 was verified with photos, attendance records, and Acceptance Letter dated 28/11/2023 to Medi-Ihsan OSH Sdn Bhd. Dr Liwauddin Bin Mohamad (DOSH Registration No: HQ/12/ASS/00/306) conducted the assessment. The report was verified with Reference Number: HQ/12/ASS/00/306-2024/0002.</p> <p>Fikri Estate –</p> <p>The additional CHRA Assessment on 15/01/2024 was done through document submission, verified by photos and records. Dr Yasriza Yahaya (DOSH Registration No: HQ/10/ASS/00/8) conducted the assessment. The report is available for review. CHRA and Chemical Register issues were discussed during the safety meeting on 13/12/2023.</p> <p>Verification confirms that all estates conducted the CHRA, and after discussions, Major Non Conformance issues were closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	A comprehensive Chemical Hazard Risk Assessment (CHRA) was conducted across various estates and mills. The main findings are as follows:

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	<ol style="list-style-type: none"> 1. Pinang Emas Estate: CHRA conducted from 19/12/2023 to 25/01/2024 (Ref No: HQ/12/ASS/00/306-2024/0002), with a Chemical Hazard Risk Assessment performed on 02/01/2024 (Ref No: HQ/10/ASS/00/8 2024/001). 2. Sungai Tong Palm Oil Mill: CHRA conducted on 15/01/2024 to 04/02/2024 (Ref No: HQ/12/ASS/00/306-2024/0003). The Chemical Hazard Risk Assessment was performed on 03/07/2024 (Ref No: HQ/16/ASS/00/31-2024/18). 3. Jerangau Estate: CHRA conducted on 15/01/2024 to 04/02/2024 (Ref No: HQ/12/ASS/00/306-2024/0003). The Chemical Hazard Risk Assessment was conducted on 15/03/2022 (Ref No: JKKP HQ/10/ASS/00/8 2022/014), with a reassessment on 18/04/2024. 4. Fikri Estate: CHRA conducted on 19/12/2023 to 25/01/2024 (Ref No: HQ/12/ASS/00/306-2024/0002). The Chemical Hazard Risk Assessment was performed on 23/07/2024 (Ref No: JKKP HQ/08/ASS/00/2024/054). 5. Tayor Estate: CHRA conducted on 15/01/2024 to 04/02/2024 (Ref No: HQ/12/ASS/00/306-2024/0003). The Chemical Hazard Risk Assessment was performed on 08/03/2022 (Ref No: JKKP HQ/10/ASS/00/8 2022/013). <p>An additional CHRA for Jaya Estate was conducted from 26/09/2024 to 10/10/2024 for new fertilizer and rat bait. Training on chemical handling, focusing on PPE usage, was also provided. Verification across all sampled estates confirmed that chemical registers were updated and that all chemicals were assessed according to the CHRA guidelines, thus the Major NC remain close.</p>
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Previous Audit Critical (Major) Non-conformity				
NCR Ref #	2418839-202311-M3	Issued Date	09/11/2023	
Due Date	07/02/2024	Closure Date	30/01/2024	
Indicator & Category (Critical / Minor)	Critical - 6.2.2			
Statement of Nonconformity:	Compensation for all work performed was inaccurately recorded in payroll system documents and employment contract was not in compliance with Employment Act 1955.			
Requirement Reference:	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.			
Objective Evidence:	<u>Pelung Estate</u> i) Information recorded in the check roll book for harvester (piece rated), worker ID: PL1100948 as per below:			
	Task/work performed	Details	<table><tr><td>Rate per bunch/allowance rate</td><td>Total compensation paid</td></tr></table>	Rate per bunch/allowance rate
Rate per bunch/allowance rate	Total compensation paid			

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Buffer zone	Total harvested bunches: 386 *Inclusive work on rest day/Friday (25/11/2022)	RM2 per bunch	RM 772 inclusive of 40 harvested bunches on 25/11/22 *40 bunches was not calculated as double rate of pay
Public holiday work (field 17A2)	19, 20 & 28/11/22 Total harvested bunches: 420	RM 0.50 per bunch	RM 150 for 300 bunches *120 bunches was not paid
Rest day work, PH work	19, 20, 25 and 28/11/22	RM 50 per day	RM 100 paid

Inconsistent information recorded in the pay slip compared to check roll book for the said worker. 40 of harvested bunches on rest day (25/11/22) was not paid double rate of pay. Furthermore, harvested bunches (420) were not paid in full for public holiday work on 19, 20 & 28/11/22 and allowance for PH was only paid for 2 days.

ii) Contract of service between Koperasi Sejahtera and employee with ID: 770112035621 under clause 4: "potongan KWSP akan dilakukan selepas tamat tempoh percubaan" which stipulate a term or condition of service which is less favourable to an employee.

iii) Incorrect wages calculation in Plantware for the following samples:

Wages (normal day – piece)	Ordinary rate of pay	Estate/workers ID
RM 2,232.85 (14 days)	22.16	Fikri Estate (FK1801085)
RM 1,582.72 (18 days)	31.46	Fikri Estate (FK2301449)
RM 1,533.85 (26 days)	51.77	Pinang Emas Estate (PE2301606)

Normative reference:

i) Employment Act 1955, section 60(3)(d) - In the case of an employee employed on piece rates who works on a rest day, he shall be paid twice his ordinary rate per piece.

ii) Employment Act 1955, Contract of Service, section 7: More favourable conditions of service under the Act to prevail; term or condition of service which is less favourable to an employee than a term of condition of service prescribed by this Act or any regulations.

	<p>iii) MAPA/NUPW and other general employees and fringes benefits agreement, 2019</p> <p>iv) Ordinary rate of pay (ORP) : defined whether calculated by the month, the week, the day, the hour, or by piece rate, or otherwise, which an employee is entitled to receive under the terms of his contract of service for the normal hours of work for one day, but does not include any payment made under an approved incentive payment scheme or any payment for work done on a rest day or on any gazetted public holiday granted by the employer under the contract of service or any day substituted for the gazetted public holiday.</p>
Corrections:	<p>i. The insufficient payment has been calculated, and the payment will be made on November 2023 salary.</p> <p>ii. To hold a meeting with Koperasi Sejahtera and brief them on the requirements of the Employment Act 1955. They must make EPF deductions and contributions to their workers and stated in the worker's payslip. A reminder letter was sent to Koperasi Sejahtera to correct this matter.</p> <p>iii(b). FK2301449 – To revise each ORP payment item and update the type of employee according to work type.</p> <p>iii(c). PE2301606 - The insufficient payment for the month of June 2023 will be paid on November 2023 salary – Public holiday (RM5.92 x 3 days = RM17.76).</p>
Root Cause Analysis:	<p>i. Management has informed all employees that they are not allowed to go out to work on 25/11/2023 (Friday), which is a rest day, and 28/11/2023 (Monday) which is public holiday, but worker ID: PL1100948 (Nurali) does not follow the management's instruction. Therefore, bunches and incentive payments are not taken into account for the said day.</p> <p>The employee's salary calculation by the responsible staff is inaccurate because it was calculated manually and there was no review by the Assistant Manager/ Chief Clerk to ensure that the calculation is correct.</p> <p>ii. Koperasi Sejahtera is the contractor for the FFB dispatch. There is an agreement available between Pelung Estate and the contractor, which indicates that the contractor must comply with the requirement of RSPO and MSPO. No EPF contribution is made to the contract worker due to lack of proper training and guidelines from the estate.</p> <p>iii(a). FK1801085 – Spraying fee allowance is not in the ORP calculation category, and no errors in the system occurred. ORP that is less than the minimum wage will be made as additional payment.</p> <p>iii(b). FK2301449 – Error occurred due to incorrect ORP setup for loader incentive payment. However, for every month, the ORP that is less than the minimum wage will be made as additional payment .</p> <p>The loader incentive allowance was incorrectly set up in Plantware by payroll staff, causing its undeclared status as one of the payments in the ORP calculation category. The PIC was not familiar with the Plantware system.</p> <p>iii(c). PE2301606 – He is a harvester, and at the same time carries out pruning work to meet the minimum wage, RM57.69 per day. The pruning fee is paid at the rate of RM5 per palm and RM2 per palm. The pruning fee allowance is not in the ORP calculation category, and no errors in the system occurred. ORP that is less than the minimum wage will be made additional payment, i.e., the next month's payment in accordance with the ORP rate is sick leave and public holiday.</p>

	<p>The ORP is supposed to be paid to the worker accordingly and comply with the minimum wage. Although the ORP had been monitored to ensure the rate was correct, mistakes sometimes occurred due to a lack of information about the worker's daily work, especially during changing work from harvesting to pruning.</p>
Corrective Actions:	<p>i. Prior notice will be given to all workers if the management does not allow them to work on a rest day or public holiday, supervised by the Assistant Manager and Field Assistant.</p> <p>Assistant Manager/Chief Clerk to double check the worker's payslip (rest day, public holiday, total bunches, etc) before account closing to ensure the wages paid aligned with the recorded checkroll.</p> <p>A memorandum letter will be issued to ensure the checkroll and payslip will be checked by the PIC before account closing.</p> <p>ii. To conduct training for the contractors on the requirements of the Employment Act 1955 and to assist the contractor in making proper contributions and deductions (EPF) as per the requirement of the Employment Act 1955.</p> <p>iii. Improvement by using the piece-rated payment module, where the data will be keyed in by entering the hectarage and the price offered. Piece-rated is included in the ORP calculation.</p> <p>The ORP calculation will be monitored and checked by the Chief Clerk to ensure no mistakes happen during keying the information in the payroll system or after keying in the system. If there is an issue with the calculation of the ORP, the IT department must be notified for review and proper training will be conducted to prevent a recurrence of the same issues.</p>
Assessment Conclusion:	<p>Pelung Estate</p> <ol style="list-style-type: none"> 1. Koperasi Sejahtera – Training on legal compliance has been conducted on 26/11/2023 with the reminder letter sent to the Koperasi Sejahtera dated 26/11/2023. Sighted the salary slip with the EPF deduction is available for review. Deduction from workers and contribution details from employer were available for review. 2. Details for workers ID PL1100948 – the management has reimbursed the salary during the November 2023. Details of the salary slip and calculation details were verified. 3. Memo to Assistant Manager, Chief Clerk and Clerk were issued on 26/11/2023 for the checking of workers salary before the account closure. This is to make sure all salary were prior to account closure and must be inline with the checkroll. <p>Ladang Fikri / Pinang Emas</p> <ol style="list-style-type: none"> 1. Training on Plantware System were conducted during the Chief Clerk and Payroll Clerk meeting on 14/12/2023 at Paya Bunga Hotel, Kuala Terengganu. 2. Plantware System – Verification made that the Ordinary Rate Of Pay were not mark for workers working in spraying and FFB loading, which is the core work at estate. <p>Sample taken for the same worker for the month of December 2023 found that the ORP were above the minimum wages which was at 59.09 respectively for the Fikri Estate and Pinang Emas Estate, the worker public holiday pay for the month of June 2023 were reimbursed in the month of November 2023.</p>

Effectiveness Closure (for previous audit closed Critical NC):	Sample of 42 employment contract, pay slip for month April, June and August 2024, check roll and overtime records found out that there is no issues of salary payment. Worker's payment has been paid accordingly. Sighted that workers work on rest day has been paid double rate which confirm through documentation and interview. Hence, Major Non-conformities remain closed.
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Previous Audit Minor Non-conformity			
NCR Ref #	2418839-202311-N1	Issued Date	09/11/2023
Due Date	09/11/2023	Closure Date	17/10/2024
Indicator & Category (Critical / Minor)	Minor - 3.4.2		
Statement of Nonconformity:	Social management plan was not comprehensively developed with participation of affected stakeholders.		
Requirement Reference:	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.		
Objective Evidence:	No records of consultation with China Communications Construction Company (M) Sdn Bhd (CCC) in the process of 2023' SIA management plan development for Fikri and Jaya Estate. CCC was also not invited in the latest North Zone stakeholder's meeting on 17/10/2023. Currently CCC is in progress of constructing ERCL project which affecting some stretch/area within Jaya and Fikri Estate.		
Corrections:	To insert or place China Communications Construction Company (M) Sdn. Bhd. (CCC) into Fikri and Jaya stakeholder's listing. The existing Social Impact Assessment (SIA) management plan will be reviewed and revised accordingly for both estates (Fikri and Jaya Estate).		
Root Cause Analysis:	Most of the time, China Communications Construction Company (M) Sdn Bhd (CCC) is communicating with the representative from the Operation Department at the headquarters level and does not involve staff from the estate. That is why CCC is not listed in Fikri and Jaya stakeholder's listing.		
Corrective Actions:	In the future, whenever there is a new stakeholder, the estate will communicate with the Sustainability or Operation Department to review and update the list/ plan.		
Assessment Conclusion:	<ol style="list-style-type: none"> 1. List of stakeholders for both estates (Ladang Jaya and Ladang Fikri has been updated on 01/04/2024 and to include China Communications Construction Company (M) Sdn Bhd (CCC). 2. Meetings has been conducted with China Communications Construction Company (M) Sdn Bhd (CCC) on 04/07/2023 and minutes meeting verified minute meeting reference 1/2023 to discuss issues related to social impact due to ECRL construction project. Another meeting/site visit conducted on 24/03/2024. 3. Social management plan for both estates has been updated on 12/10/2024 and to include ECRL construction by China Communications Construction Company (M) Sdn Bhd (CCC). 		

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

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2288561-202212-M1	Critical	2.2.2	15/12/2022	Closed on 12/02/2023
2288561-202212-M2	Critical	3.6.2	15/12/2022	Closed on 12/02/2023
2288561-202212-M3	Critical	6.2.4	15/12/2022	Closed on 12/02/2023
2288561-202212-M4	Critical	6.7.3	15/12/2022	Closed on 12/02/2023
2288561-202212-N1	Minor	3.3.2	15/12/2022	Closed on 09/11/2023
2288561-202212-N2	Minor	2.3.2	15/12/2022	Escalated to Major NC
2418839-202311-M1	Critical	2.3.2	09/11/2023	Closed on 30/01/2024
2418839-202311-M2	Critical	3.6.1	09/11/2023	Closed on 30/01/2024
2418839-202311-M3	Critical	6.2.2	09/11/2023	Closed on 30/01/2024
2418839-202311-N1	Minor	3.4.2	09/11/2023	Closed on 17/10/2024
2562609-202410-M1	Critical	3.4.3	17/10/2024	Closed on 24/11/2024
2562609-202410-M2	Critical	6.7.3	17/10/2024	Closed on 24/11/2024
2562609-202410-M3	Critical	7.8.2	17/10/2024	Closed on 24/11/2024
2562609-202410-N1	Minor	7.3.2	17/10/2024	Open
2562609-202410-N2	Minor	2.2.2	17/10/2024	Open

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss TDM Sg Tong POM Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

Structured worker interviews with male and female workers and staff were held in private at the workplace. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were

interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Contractor	Mohd Azam Ibrahim	Face to face
Contractor	Mohamad Noor Mohamad- Green Monitoring	Face to face
Local communities	Mohd Rosli bin Mohd Noor- JPKK Kampung Landas	Face to face
Neighbouring estate	Mohd Syawal bin Samsuddin- Hadi Plantation	Face to face
Neighbouring estate	Mohd Azreen bin Mohd Rani- FELDA Belara	Face to face
Government agencies	Noor Akma Shafie- JTK Besut/ Setiu	Face to face
Internal	Local and foreign workers	Face to face
Internal	Gender committee	Face to face
Internal	Workers representative	Face to face

Stakeholders comment	
1	<p>Feedbacks: Mohd Azam Ibrahim; Mohamad Noor Mohamad- Green Monitoring</p> <p>The contractor has a good relationship with the company where they have been providing the service for many years. The contractor also mentioned that the award of contract was done through fair and unbiased tendering process. Payments were always made on timely manner. The management and staff of the operating units have also been very accommodating should there be any issues of concern. The operating units also actively provide trainings on RSPO especially with regards to legal, OHS, best practices and employees' welfare. Although a few challenges were faced in implementing the requirements due to limited knowledge and resources, the contractors have stated that they will do their best to comply. They informed that they do not employed any child labour.</p> <p>The company has also always invited the contractor's representative to attend the stakeholder meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any. No issue with the management at this moment</p> <p>Audit Team verification and response: No further action required.</p>
2	<p>Feedbacks: Mohd Syawal bin Samsuddin- Hadi Plantation and Mohd Azreen bin Mohd Rani- FELDA Belara</p> <p>There are no issues with the management at the moment. Both mentioned their plantations is located near the estate and has clearly demarcated boundaries, distinguished from the estate by trenches. There has been no encroachment on his land. Estate management given him permission to use the estate road for transport his harvested crops. The estate management also invited him to the annual stakeholder meeting.</p> <p>Audit Team verification and response: No further action required.</p>

3	<p>Feedback: Noor Akma Shafie- JTK Besut/ Setiu</p> <p>There is no issues related to employment has been raised related to all operating unit under Sungai Tong POM. She mentioned that the management provide cooperations with JTK and often invited for stakeholder meeting and communication has been done regularly.</p> <p>Audit Team verification and response: No further action required.</p>
4	<p>Feedback: Local and foreign workers</p> <p>Employment contract and payslip were provided, and the salaries deposited into workers bank account. Wages are paid according to Minimum Wages Order 2022. PPE is provided at no cost and can be replaced by making a request to the estate management. Foreign workers retain possession of their passports. Workers are aware of the complaint and grievance channels available to them. The management has been very accommodative to the workers in term of welfare. With regards to welfare, housing facilities, water & electricity supply were always maintained in good conditions. There has been no issue with regards to delivering the terms & conditions stipulated in the employment contract. Regular training on company's SOP, policies, safety and health, environmental and social aspects were conducted by operating unit. All issues has been resolved and they also channel their complaints to the workers representatives.</p> <p>Audit Team verification and response: No further action required.</p>
5	<p>Feedback: Gender committee</p> <p>They informed that no sexual harassment and violence cases reported since the last audit. Female workers understand the function of Gender Committee and aware the complaint mechanism if there are any issues occurred. They were treated equally without any discrimination by the management. The committee is tasked with planning annual activities for female workers to ensure a conducive living environment in the estate and during this activities they also can also know each other better, making easier to share any problems or thoughts. The management has also been very supportive with the programmes in term of financial, facilities and other resources. They were also informed that they are treated equally and given same opportunity as the male such as promotion as mandore in the estate.</p> <p>They were briefed on the new mother's requirements for specific needs and consultation have been conducted by the management. They informed that those who handle chemical found pregnant will be transferred to other job stations that do not hazard to the worker. They allow to go back for breastfeeding during working hour in case they need</p> <p>Audit Team verification and response: No further action required.</p>
6	<p>Feedback: Workers representative</p> <p>They informed that there are no outstanding issues with the estate and mill management. Regular meetings between the management and workers representative are conducted to address any matter arising from the workers. Worker's welfare including housing, salary payment and benefit are well taken care of by the estate and mill management. They also informed that the management did not involve in the selection of workers representatives. All representatives are elected by workers. Management provides a place for election process.</p> <p>Audit Team verification and response: No further action required.</p>
7	<p>Feedback: Mohd Rosli bin Mohd Noor- JPKK Kampung Landas</p> <p>Good cooperation given by estate management team. The management will help whenever they requested for help. Estate under TDM Plantation Sdn Bhd is known for offering job opportunity to the villager. No land encroachment from TDM Plantation Sdn Bhd estates. Demarcation of boundaries by the trenches, fencing and boundary stone were available. Estate provides access to the villagers using their roads for emergency cases.</p> <p>Audit Team verification and response: No further action required.</p>

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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 Sg Tong 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 Sg Tong 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>



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 TDM Sg Tong POM Certification Units 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 TDM Sg Tong POM Certification Units is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: NOR HALIS ABU ZAR	Name:
Company Name: BSI SERVICES MALAYSIA SDN BHD	Company Name: TDM PLANTATION SDN. BHD.
Title: CLIENT MANAGER	Title: <div style="text-align: right;">  MOHD ZAMY BIN ABDULLAH Plantation Controller (PC) TDM Plantation Sdn. Bhd. </div>
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: 24/11/2024	Date: 24.11.2024

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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 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	<p>All document has been established in Bahasa Malaysia and English. There is no information request has been received by the management for all operating units and has been verified based on the records of communication and interview with stakeholders.</p> <p>As per interview with the management, any information request will further explained by the compliance staff if there is any queries.</p>	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	<p>There is no information request has been received by the management for all operating units and has been verified based on the records of communication and interview with stakeholders.</p> <p>Communication records that recorded is related to request for assistance and contribution by the stakeholder. All communication records have been maintained in the Communications logbook.</p>	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 -	<p>Procedure for consultation and communication has been documented in the document title Stakeholder communication (Grievance, complaints & information request) document number TDMP/02 revision 01/2022.</p> <p>Stakeholders meeting has been done for all stakeholders under Sg Tong Palm Oil Mill dated 10/09/2024 that has been attended by various category of stakeholders. The procedure for communication and consultation has been communicated during the stakeholder's meetings by Puan Norwati bin Mamat.</p>	Complied

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		<p>Interviews with sample stakeholders, confirmed that they can demonstrate their understanding on the procedure and process of consultation and communication procedure.</p> <p>Most of the communication and consultation that has been recorded is related to request for assistance and contribution by stakeholders. There is evidence that it has been responded within the timeline as verified based on the records and interviews with stakeholders.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>List of stakeholders has been established and documented in the document title "List of stakeholders" which include information such as name of stakeholders, person in charge, address, contract number and email.</p> <p>For Pinang Emas Estate, list has been updated on 30/09/2024 which has listed 3 local communities which JPKK Ladang Pinang Emas, Masjid Ladang Pinang Emas.</p> <p>While for Fikri Estate, list stakeholders has been updated on 12/11/2024 and listed 3 local communities which area JPKK Kampung Bukit Nenas, JPKK Kampung Pak Ba and JPKK Felda Belara.</p> <p>For Tayor Estate, 3 local communities has been listed which are JPKK Kampung Tayor Tengah, JPKK Kampung Sungai Las and JPKK Kampung Bukit</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>Policy for ethical conduct is in place as per newly revised Polisi Etika Kerja; approved by new CEO on 22/2/2023. The policy also sighted during site visit at estate and mill's notice board.</p>	Complied

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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>System has been established to monitor compliance of the policy through the external finance audit that will be conducted on annual basis. Latest finance audit has been done by Ernst and Young from 29/10/2023 until 21/11/2023. As per interview with the management, the next audit expected in November 2024.</p> <p>Other than that, the management of TDM Plantations has established system for tendering process which open tender has been practices by initiated through advertisement process, tender submission, negotiations process and decision will be made from representative from operating units, procurement, chief executive officer. Sample of documentation sighted in the C Form, D Form, Summary of quotations, Interview form.</p> <p>Whistleblowing policy has been established by TDM Plantation Sdn. Bhd. for any stakeholders to report any in compliance of the policy. Disclosure or report can be made to any of the following dedicated reporting channels, in a strictly confidential manner: -</p> <ol style="list-style-type: none"> 1. Secured email address whistleblowing @tdmberhad.com.my 2. By writing; Send or email the letter / notice to TDM HQ 3. Meet in person with the Head of Compliance, Integrity & Sustainability 	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>TDM Sg Tong 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</p>	Complied

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		<p>were:</p> <p>Pinang Emas Estate</p> <ol style="list-style-type: none"> 1. MPOB Licence #502606002000 valid until 07/05/2024 until 28/02/2025 2. Air Compressor #TG PMT 4819 valid until 28/07/2025 3. Diesel permit#T011782 valid from 10/09/2024 until 09/09/2027 4. Weighbridge calibration #D073194 inspected by De Metrology dated 06/12/2023 <p>Sg Tong POM</p> <ol style="list-style-type: none"> 1. MPOB Licence #500042704000 valid from 01/04/2024 until 31/03/2025 2. DOE Licence #004090 valid from 01/07/2024 until 30/06/2025 3. Energy Commission Permit #2024/00565 valid until 01/04/2025 4. Boiler permit #TG PMD 424 valid until 28/05/2025 5. Back Pressure Receiver #TG PMT 5357 valid until 28/05/2025 6. Abstraction Licence #PA(P)-A0001 valid until 31/12/2024 7. Weighbridge calibration #B2188627 inspected by De Metrology dated 11/09/2024. 8. Diesel permit #T001116 valid from 24/02/2022 until 23/02/2025 9. Competence person #HQ/19/AGTES/01/04234 to Assistant Manager NRIC 800624-XX-XXXX 	
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		<p>10. Competence Person #CePPOME/00307 to Assistant Manager NRIC 900424-XX-XXXX</p> <p>11. Competence Person #CePSWaM/02892 to Compliance Executive NRIC 860406-XX-XXXX</p> <p>Jerangau Estate</p> <p>1. MPOB Licence #622106002000 valid from 01/09/2024 until 31/08/2025</p> <p>2. MPOB Licence #502250102000 valid from 01/09/2024 until 31/08/2025</p> <p>3. Compressed Air Receiver Tank #TG PMT 7793 valid until 03/01/2025</p> <p>4. Permit for salary Deduction for Bank and Electricity by JTK #JTK/(T).600.2.2.1Jld2(4) dated 30/05/2019</p> <p>Fikri Estate</p> <p>1. MPOB Licence #503379102000 valid from 01/09/2024 until 31/08/2024</p> <p>2. Air Compressor #TG PMT 3948 valid until 29/08/2025</p> <p>3. Diesel Permit #T001093 valid until 04/11/2027</p> <p>4. Permit by JTK for Salary Deduction for Bank, Electricity Bill #JTK/(T)600.2.4(14) dated 22/10/2017</p> <p>Tayor Estate</p> <p>1. MPOB Licence #620785002000 valid from 01/02/2014 until 31/01/2025</p> <p>2. Diesel #T-000101 valid until 05/08/2017</p>	
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		<p>3. Abstraction Licence #PA(P) -A0040 valid until 31/12/2024</p> <p>4. Pressure Vessel #TG PMT 4424 valid until 29/09/2025</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 mill and 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>Pinang Emas Estate</p> <p>Sighted boundary at P2017B neighbouring with Gajah Mati Estate. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p>Jerangau Estate</p> <p>Sighted boundary at PM13B boundary with Smallholder. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p>Tayor Estate</p> <p>Sighted boundary at P2013A2 neighbouring with RISDA. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p>Fikri Estate</p> <p>Sighted boundary at PM00B/1 neighbouring with Jaya Estate. 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>The list of contracted parties was made available for verification at the visited operating units and included in the stakeholder list an maintained accordingly</p>	Complied

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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>Samples of contracts and "Perjanjian Pesanan Kerja/PPK" were verified at all visited operating units.</p> <p>Labour Agency</p> <ol style="list-style-type: none"> 1. PT Primaxxxx Pratxx Pandaxxxxxx – Agreement dated 7/11/2022 for Indonesian workers. 2. Qauxxxxx Overxxxx Consulxxxxx Pvt. Ltd – Agreement dated 8/11/2022 for Indian workers. <p>Others:</p> <ol style="list-style-type: none"> 1. Mexxx Angxxx Sdn Bhd – Contract dated 20/05/2024 for transporting CPO from Sungai Tong Palm Oil Mill to the refinery. Contract period: 20/05/2024 to 31/12/2024, with agreement. <p>FFB Sales and Purchase Agreement:</p> <ol style="list-style-type: none"> 1. NX Agrixxxxxxxx Sdn Bhd – Ref. No: TDMP/OD/OCP/24 – Dated 29/08/2024 2. Haxx Plantxxxxxx Sdn Bhd – Ref. No: TDMP/OD/OCP/240930-06 – Dated 20/09/2024 3. Syarxxxx Warxxxx – Ref. No: TDMP/OD/OCP/24 – Dated 29/08/2024 <p>Estate Operation Contractor</p>	Non-compliance
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		<ol style="list-style-type: none"> 1. Sandemas Trading Sdn Bhd – Ref. No: FK08/24 for planting work, FK07/24 for pruning – Fikri Estate 2. Hadi Plantation Sdn Bhd – Ref. No: LTY-13/24 for harvesting work in Field 97A and 97B – Tayor Estate <p>A verification of the employment contract between Sandemas Trading Sdn Bhd and its employees found that the contract content does not comply with requirements. Issues identified include the details such as the wrong employment location, working hours, termination notice period, seizure of employees' passports by the employer, and the immigration guarantee sum paid by employees, which is only returned after the contract ends. Although the management carried out a due-diligence process by reviewing employees' salary slips, the issue with the employment contract was not detected. As a result, a Non-Conformance was raised.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Contract on CPO Transport has outline in the scope of service item no 7 and 8 stated that the contractor cannot hire child labour, fore labour and trafficked labour as well as compliance towards the certification of RSPO, MSPO and ISCC</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license 	<p>The list of direct FFB sources for Sungai Tong Palm Oil Mill was addressed. The Palm Oil Mill management successfully obtained the required information from the direct FFB suppliers. The information includes details such as:</p> <ol style="list-style-type: none"> 1. Source of FFB 2. Address of plantation/dealer 	Complied

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	- Critical (Major) compliance -	3. MPOB license and its validity 4. Coordinates and size of the plantation																																																																																					
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 -	<div>Sample taken on the FFB Dealer for Hadi Plantation Sdn Bhd (FFB Dealer) with MPOB License No: 533468015000 , NK Agriculture Sdn Bhd MPOB License No: 619082015000 , Syarikat Warisan with MPOB License No: 505522115000 is as following.</div> <table><thead><tr><th>N o</th><th>MPOB License</th><th>Latitude</th><th>Longitude</th><th>Hectar (ha)</th><th>Land No/Lot No</th></tr></thead><tbody><tr><td colspan="6">Hadi Plantation Sdn Bhd</td></tr><tr><td>1</td><td>875706001011</td><td>5.308977</td><td>102.894245</td><td>3.8773</td><td>1615/498</td></tr><tr><td>2</td><td>875706001011</td><td>5.275667</td><td>102.930279</td><td>1.392</td><td>3816/2767</td></tr><tr><td>3</td><td>860563001011</td><td>5.284422</td><td>102.929513</td><td>2.718</td><td>3022/2763</td></tr><tr><td>4</td><td>863459001011</td><td>5.271466</td><td>102.928761</td><td>0.4972</td><td>54/10824</td></tr><tr><td colspan="6">NK Agriculture Sdn Bhd</td></tr><tr><td>1</td><td>504469602000</td><td>4.8252778</td><td>103.266388</td><td>434.55</td><td>541</td></tr><tr><td>2</td><td>504517002000</td><td>5.1286111</td><td>103.037500</td><td>911.88</td><td>3003</td></tr><tr><td colspan="6">Syarikat Warisan</td></tr><tr><td>1</td><td>905192001011</td><td>5.620275</td><td>102.488200</td><td>1.234</td><td>235</td></tr><tr><td>2</td><td>801591001011</td><td>5.703960</td><td>102.559160</td><td>1.5149</td><td>32</td></tr><tr><td>3</td><td>805196001011</td><td>5.513500</td><td>102.791700</td><td>2.6721</td><td>1141</td></tr><tr><td>4</td><td>816218001011</td><td>5.672630</td><td>102.615260</td><td>0.6147</td><td>2771</td></tr></tbody></table>	N o	MPOB License	Latitude	Longitude	Hectar (ha)	Land No/Lot No	Hadi Plantation Sdn Bhd						1	875706001011	5.308977	102.894245	3.8773	1615/498	2	875706001011	5.275667	102.930279	1.392	3816/2767	3	860563001011	5.284422	102.929513	2.718	3022/2763	4	863459001011	5.271466	102.928761	0.4972	54/10824	NK Agriculture Sdn Bhd						1	504469602000	4.8252778	103.266388	434.55	541	2	504517002000	5.1286111	103.037500	911.88	3003	Syarikat Warisan						1	905192001011	5.620275	102.488200	1.234	235	2	801591001011	5.703960	102.559160	1.5149	32	3	805196001011	5.513500	102.791700	2.6721	1141	4	816218001011	5.672630	102.615260	0.6147	2771	Complied
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		5	825001001011	5.711660	102.589740	0.8472	3654	
		It is verified that the management of TDM Plantation had issued the sales and purchase contract to each supplier that required the collection center to submit the details of each of their supplier as per the requirement in 2.3.1 that outlines the MPOB License, Land Legality, Coordinates and the FFB estimation. The management has established the procedure for outside crop purchase dated 31/01/2024 that has details the requirement of 2.3.2 into the process of sourcing the FFB.						
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. - Critical (Major) compliance -	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. 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. 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: a) Palm oil mill i. Mill intake – FFB input						Complied

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		<ul style="list-style-type: none">ii. Production of CPOiii. Production of PKiv. Total Palm Oil Extractionv. Total Palm Kernel Extractionvi. Mill cost <p>b) Oil Palm Estate</p> <ul style="list-style-type: none">i. Total crop projection and yield potentialii. Activity direct cost<ul style="list-style-type: none">a. Mature upkeepb. Manuringc. Harvesting and collectiond. Transportatione. Nurseryiii. Estate administration<ul style="list-style-type: none">a. Admin Costiv. Labour overheadv. Road and bridgesvi. Cost of production. <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2028) and well documented upon request.</p>	
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3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>TDM Sg Tong 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:</p> <table><tr><td>Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Pinang Emas</td><td>0.00</td><td>323.28</td><td>220.70</td><td>231.96</td><td>219.47</td></tr><tr><td>Jerangau</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>Fikri</td><td>0.00</td><td>198.14</td><td>197.76</td><td>154.52</td><td>231.15</td></tr><tr><td>Tayor</td><td>103.66</td><td>181.02</td><td>149.24</td><td>275.00</td><td>205.07</td></tr></table>	Estate	2024	2025	2026	2027	2028	Pinang Emas	0.00	323.28	220.70	231.96	219.47	Jerangau	0.00	0.00	0.00	0.00	0.00	Fikri	0.00	198.14	197.76	154.52	231.15	Tayor	103.66	181.02	149.24	275.00	205.07	Complied
Estate	2024	2025	2026	2027	2028																												
Pinang Emas	0.00	323.28	220.70	231.96	219.47																												
Jerangau	0.00	0.00	0.00	0.00	0.00																												
Fikri	0.00	198.14	197.76	154.52	231.15																												
Tayor	103.66	181.02	149.24	275.00	205.07																												
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>TDM Sg Tong 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: -</p> <ol style="list-style-type: none">1. Introduction by Chairman2. Results of Internal Audits covering RSPO & MSPO3. Customer feedback4. Status up preventive and corrective actions5. Follow up actions from management review6. Changes that could affect the management system7. Recommendations for improvement	Complied																														

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		<p>8. Improvement of the effectiveness of the management system and process</p> <p>9. Resources need</p> <p>The minutes of the meeting indicated that Internal audit findings were each thoroughly examined, and the corrective action plan were discussed.</p>	
<p>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.</p>			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The management has outlined the continuous improvement plan for each estate. The continuous improvement plan is as following:</p> <p>Pinang Emas Estate</p> <ol style="list-style-type: none"> 1. Used motorized tools for palm cutting replaces manual use of chisel chop tools 2. Use of mechanical assistance for FFB Clearing – Landsurf 3. Construction of new houses for workers to replace older housing 4. Desilting of main drain at block 19A1 for monsoon season to speed the water flow. 5. Preparation of temporary shelter (Canvas Tent) for estate community during flooding period located at staff housing quarters. <p>Sungai Tong Palm Oil Mill</p> <ol style="list-style-type: none"> 1. To relocate, refurbish, upgrade the toilet conditions 	Complied

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		<ol style="list-style-type: none"> 2. To replace the old wood house with new brick house and repair the houses damages 3. To installed the acoustic room at kernel plant 4. To upgrade the LEV System. 5. To build and install new boiler to replace the existing old boiler <p>Jerangau Estate</p> <ol style="list-style-type: none"> 1. Use of mechanical assistance for FFB Clearing from the tree to the collection points 2. Usage of LED light bulb at office and housing area. <p>Fikri Estate</p> <ol style="list-style-type: none"> 1. Maximising rainfall resources and reuse for any suitable purpose 2. LTI Sign installation in office area 3. QR Code for USUA box installation in office. 	
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>The reporting for the economic, social, and environmental metrics of the TDM Sg Tong 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 Sg Tong POM has been submitted to the RSPO Secretariat. Additionally, the PalmGHG data for this UoC has been submitted to the BSI Assessment Team prior</p>	Complied

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	<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>	to the audit and was approved after onsite verification by the CB using PalmGHG Version 4.	
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>A Standard Operating Procedure (SOP) has been developed for both the mill and the estate to guide all operations at the site. Samples of estate SOPs are listed below:</p> <ol style="list-style-type: none"> 1. Long Stalk Cutting Procedure – dated 16/08/2023 2. Manuring – dated 01/04/2017 3. Environmental Aspect Impact Identification Procedure – dated 01/10/2023 4. Trunk Injection – dated 01/04/2017 5. Harvesting – dated 01/04/2017 6. Accident Procedure – dated 01/04/2017 <p>Samples of mill SOPs are listed below:</p> <ol style="list-style-type: none"> 1. Permit to Work Procedure – dated November 2020 2. Supply Chain SOP (IP & MB Module) – dated 01/01/2022 3. HIRARC Procedure – dated December 2022 4. Emergency Response Plan – dated 01/01/2018 5. Confined Space Procedure – dated December 2022 6. Management Review Procedure – dated November 2022 	Complied

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		The management has established SOPs for all operations, and these were communicated to workers during the morning muster call. A site visit to the estate verified that the sampled activities followed the SOPs.	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	<p>The management ensures the consistent implementation of estate and mill procedures through visits by the Mill/Plantation Advisor, Agronomist, and internal audits.</p> <p>The Head of Mill Operations conducted an inspection at the mill and held discussions with the mill management. The minutes of the Task Force Group meeting for Sungai Tong Palm Oil Mill, dated 10/07/2024, were reviewed.</p> <p>Agronomist reports for the estates were also verified as follows:</p> <ul style="list-style-type: none"> • Jerangau Estate: Assessment conducted on 23/10/2023, verified with Ref No: TDMP/OD/08/12-Adv/LIR_2023. • Fikri Estate: Assessment conducted on 23-24/07/2024, verified with Ref No: TDMP/OD/08/12-Adv/LFK_2023. The report is pending. • Taylor Estate: Assessment conducted on 29/11/2023, with the report dated 17/01/2024, verified (Ref No: TDMP/OD/09/12-Adv/LTY_2023). 	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	All operational units consistently maintain records of their monitoring activities, which are readily accessible for review. These records cover all levels, from field and mill supervisors to top executives and managers. The Plantation Controller (PC) is responsible for overseeing the estates' adherence to standard	Complied

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		<p>operating procedures, budgetary constraints, and productivity targets.</p> <p>The performance of the estates and mills is evaluated monthly during meetings involving the PC, Chief Executive (CE), and Chief Executive Officer (CEO). Below is a sample of the monitoring reports:</p> <ol style="list-style-type: none"> 1. Jerangau Estate: Internal Audit Report dated 11/07/2024 2. Pinang Emas Estate: Internal Audit Report dated 20/08/2024 3. Sungai Tong POM: Internal Audit Report dated 09/07/2024 4. Taylor Estate: Internal Audit Report dated 22/07/2024 5. Fikri Estate: Internal Audit Report dated 18/07/2024 	
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Social impact assessment (SIA) has been done on 12-15/06/2024 by Green Orbis Environment Sdn Bhd and the report has been made available in the document GO/SIA/2203-01.</p> <p>Apart of positive findings, the assessor has negative/improvement findings.</p> <p>While for Sungai Tong POM, social impact assessment conduct in October 2022 by Green Sustainability Resources Sdn. Bhd by Ms Ermadasila bin Mohamad.</p> <p>Several issues has been highlighted during the assessment and sample has been taken on issues lack of understanding on the employment contract related to balance of annual leave and</p>	Complied

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		<p>overtime. Other than that, there is issues raised from the FFB supplier where there is lack of understanding on the FFB grading and FFB pricing.</p> <p>The methodology of the assessment has been done based on site visit, interview with internal and external stakeholders and documentations.</p> <p>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 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 cutting2. Parking vehicle3. Herbicide spraying4. Maintenance station5. Store cleaning <p>Mill</p> <ol style="list-style-type: none">1. Steriliser2. Boiler3. Laboratory4. EFB dumpsite	
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		<p>5. Final discharge</p> <p>The monitoring on the impact of mill and estates activities has been verified and 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>Social management plan has been established for each operating units and has been updated for year 2024, sample has been taken related off-spec workers housing. The management in Pinang Emas Estate has constructed 8 new housing in year 2023 with 3 rooms for each house. The management will request additional housing for next financial year.</p> <p>While for Sungai Tong POM, Social management plan has been established based on the recommendation where the management has plan to do refresher training to all workers on employment contract and refresher training on FFB grading/pricing.</p> <p>For Fikri Estate, the social management plan has been updated by Noreezatul Aiza Musa dated 10/10/2024. One of the management plans has been established on issues related to cow owned by the local communities in the estate area. The management has plan to be issued warning letter to all the cow owners.</p> <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>	Complied

		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:		
		Management Plan	Action Plan	
		Reduce water consumption by maximizing 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 planted during replanting activities	
		Prevent chemical substance from entering surrounding /drainage	Prepare chemical mixing in designated areas before spraying work carried out	
		Prevention of excessive diesel or lubricant spillage during operation	Regular schedule cleaning to ensure leakage is manageable if any and to avoid further land and water pollution	
		Manage fuel consumption of water pump engine by operation monitoring	Ensure engine to be started only when operating and to shut down immediately when stop operating	

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		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>There is evidence that the management plan has been implemented and verified by the auditor based on the documentation, site visit and interview.</p> <p>For Sungai Tong POM, sighted that the employment contract has been communicated to all workers on 12/02/2024 and to all workers representative 06/10/2024.</p> <p>Communication to all FFB supplier has been done 30/07/2024.</p> <p>For Fikri Estate, for the cattle issues, sighted the management has issued memo to all cattle owner on 22/09/2024 reference number TDMP//LFK/24/09(130).</p> <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>	Non-compliance

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		<ol style="list-style-type: none"> 1. Environmental management plan 2. Waste Management Plan 3. Pollution Prevention Plan 4. Water Management Plan 5. IPM Management Plan <p>Sg Tong POM</p> <p>Social impact assessment management plan has been established based on the response from the stakeholders. A sample of feedback from local operational workers has highlighted issues with the lack of basic amenities, such as fans, mattresses, wardrobes, and dining tables, for those residing in the older workers' quarters.</p> <p>Stated in the management plan that the management will review latest Minimum Housing Standard, to conduct census to get information on status of basic amenities, to established long term plan and to implement the management plan.</p> <p>As per interview with sample workers stay at the old workers quarters, there is no basic amenities for furniture has been provided and has been confirmed by the management. There is no census and long-term plan has been conducted and established.</p> <p>Thus Major NC was raised.</p>	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	There is no changes compare to last year where TDM Plantation Sdn Bhd has an SOP for recruitment of mill and estates. SOP named "Pengurusan Tenaga Kerja Tamu", TDMP/SOP-OD/01 dated 1st March 2019. SOP for local workers (mill and estates) documented	Complied

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	- Minor Compliance -	<p>under "Prosedur Perlantikan Pekerja Ladang and Kilang", TDMP/SMP/3/01.01 dated 2nd November 2016.</p> <p>The SOP specifies that recruitment, selection and hiring process involves vetting and interviews, and must be medically fit. Promotions are at the sole discretion of the Company. Retirement age is fixed at 60 for local and termination of employment can be given mutually subject to the terms of the employment contract and Employment Act 1955.</p> <p>For foreign workers, or guest workers, the SOP for recruitment, hiring involves interview, selection based on age, qualification, and agricultural experience. Retirement and termination are as per Employment Act 1955 and employment contracts.</p>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Based on interview with sampled workers and relevant stakeholder and documentation review, it was found that employment procedures as mentioned in indicator 3.5.1 were implemented and all the records are adequately maintained. Induction process is mandatory to be carried out by operating units to ensure company's rules and regulations were socialized and acknowledged by the workers.</p> <p>Induction briefing, fill out application form, medical checkup, interview session, briefing on salary, employment terms and conditions, as well as information about grievance channel were conducted as per required in the procedures established. This was confirmed during interview with sampled workers comprising both of foreign workers from different origin countries and local workers. During the audit, stakeholder consultation was conducted with several neighbouring operating unit and local community. It was noted that job vacancies, if any, would be advertised near the locations of the operating units.</p>	Complied

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		At the operating units, application forms, interview assessment form, medical check-up report, copy of identification documents and employment contract for newly recruited employees were made available for verification. These are among the pre-requisites outlined in the recruitment procedure.	
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>The mill and estates have identified and reviewed significant hazards and risks, determining appropriate control measures. Hazard Identification, Risk Assessment, and Risk Control (HIRARC) records, along with Chemical Hazard Risk Assessment (CHRA) and Noise Risk Assessment (NRA) reports, were verified during the assessment. HIRARC is reviewed in cases of changes in work processes, legislative requirements, or the occurrence of accidents. Appropriate risk control measures have been implemented for the respective activities and operations.</p> <p>Updates on HIRARC, CHRA, and NRA were last conducted at the sampled management units as follows:</p> <p>For Pinang Emas Estate, the HIRARC was last updated on 20/08/2024. The Chemical Hazard Risk Assessment was conducted on 02/01/2024, with Report Reference No: HQ/10/ASS/00/8 2024/001 and Assessor Registration No: TGLS/PL/040/03. The Noise Risk Assessment was carried out on 12/09/2020, with Report Reference No: R-NE-20-TDMLPE-12 and Assessor Registration No: HQ/06/PEB/00/69. An additional Noise Risk Assessment was conducted on 02/07/2024, with Report Reference No: R-NE-24-LPE-04.</p>	Complied

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		<p>For Sungai Tong Palm Oil Mill, the HIRARC was last updated on 13/05/2024. The Chemical Hazard Risk Assessment was performed on 03/07/2024, with Report Reference No: HQ/16/ASS/00/31-2024/18 and Assessor Registration No: JKKP HQ/16/ASS/00/31. The Noise Risk Assessment was conducted on 16/03/2023, with Assessor Registration No: HQ/09/PEB/00/97. Additionally, the LEV Inspection, Testing, and Examination was conducted on 06/04/2023, with HT DOSH Registration No: HQ/21/JHII/00/00048.</p> <p>For Jerangau Estate, the HIRARC was last updated on 30/07/2023. The Chemical Hazard Risk Assessment was performed on 15/03/2022, with Report Reference No: JKKP HQ/10/ASS/00/8 2022/014. A reassessment was conducted on 18/04/2024. The Noise Risk Assessment was conducted on 29/09/2020, with Report Reference No: R-NE-20-TDM LJ-14 and Assessor Registration No: HQ/06/PEB/00/69. An additional Noise Risk Assessment was carried out on 22/04/2024, with Report Reference No: R-NE-24-LI-03.</p> <p>For Fikri Estate, the HIRARC was last updated on 12/08/2024. The Chemical Hazard Risk Assessment was conducted on 23/07/2024, with Report Reference No: JKKP HQ/08/ASS/00/2024/054. The Noise Risk Assessment was performed on 29/09/2021, with Report Reference No: HQ/18/PEB/00/00020-2021/006.</p> <p>For Tayor Estate, the HIRARC was last updated on 15/07/2024. The Chemical Hazard Risk Assessment was conducted on 08/03/2022, with Report Reference No: JKKP HQ/10/ASS/00/8 2022/013. The Noise Risk Assessment was carried out on 02/10/2020, with Report Reference No: R-NE-20-TDM LT-13 and Assessor Registration No:</p>	
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		HQ/18/PEB/00/69. An additional Noise Risk Assessment is recorded under Report Reference No: R-NE-24-LT-06.	
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>TDM has consistently upheld the approved Health and Safety Policy, dated 01/01/2022, which is prominently displayed on notice boards in both English and Bahasa Malaysia. This policy has been signed by the Chief Executive Officer. Additionally, a Safety & Health Management Plan for the year 2024 has been prepared and made available.</p> <p>To assess the effectiveness of the Health and Safety plan, various methods have been employed in addition to regular daily supervision. These methods include SHO Workplace Inspections, internal audits, safety committee meetings, medical surveillance, and audiometric tests. Records documenting these monitoring activities have been provided for verification by selected management units.</p> <p>At Pinang Emas Estate, health surveillance is conducted monthly for all workers involved in manuring, spraying, diesel handling, and workshop activities. The latest health surveillance took place on 26/05/2024. Management also conducted pregnancy and health checks for female workers directly handling chemicals, with all workers deemed fit. Consent by female workers has been documented prior test conducted. Interview with sample female workers confirmed this matters. Audiometric testing was performed for 26 workers, showing that 14 had normal audiometric results, while 5 workers exhibited standard threshold shifts (STS). A repeat test on 18/07/2024 indicated that one worker needed to be reported to DOSH, with the JKPP 7 report submitted on 30/07/2024.</p>	Complied

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		<p>At Sungai Tong Palm Oil Mill, medical surveillance was conducted on 14/07/2024 for 33 workers, including lab operators, maintenance personnel, and chemical operators. All workers were declared fit, with no medical review processes (MRP) needed. Audiometric tests conducted on 4-5/06/2024 for 102 workers revealed that 58 had normal audiometric results, while 5 workers had temporary STS and required retesting within three months. A retest on 13/07/2024 confirmed that 2 workers had permanent STS, and the management submitted the JKPP7 report to DOSH on 24/07/2024.</p> <p>At Jerangau Estate, medical surveillance was carried out as recommended by the CHRA, with testing conducted for workers on 24/08/2024. All workers were declared fit. Audiometric testing on 30/07/2024 involved 21 workers, with 7 showing normal audiometric results, 9 displaying high-frequency hearing loss, and 4 with hearing impairment. Two workers had abnormal audiograms, and one worker with STS was referred to the Occupational Health Doctor (OHD) on 01/10/2024. The results showed no permanent STS.</p> <p>At Fikri Estate, medical surveillance was conducted according to the CHRA recommendations, with six workers tested on 26/09/2024 and all declared fit. Audiometric testing was performed on 27-28/08/2024 for 22 workers, revealing that 10 had normal audiometric results, while 12 had previously detected abnormal audiometric results. No STS was recorded.</p> <p>At Tayor Estate, medical surveillance was conducted following the CHRA recommendations, with testing performed on 19/08/2024 for 8 workers, all of whom were declared fit. However, two workers</p>	
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		need to be reassessed within two months for liver function testing, and no MRP recommendations were made by the OHD. Audiometric testing for 24 workers was conducted on 19-21/08/2024, showing that 12 had normal audiometric results, while 6 had high-frequency hearing loss, and 2 required examination by the OHD. A retest conducted on 26/09/2024 confirmed that one worker had Occupational Noise-Induced Hearing Loss, and the JKPP7 report was submitted to DOSH by management.	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	An annual training program has been developed and documented within the Occupational Safety and Health (OSH) Plan. This program includes a detailed Training Matrix and Training Schedule that cover all aspects of the RSPO elements. The different groups of employees to be trained in various subjects are specified in the training program, ensuring that the needs of all estates and mills are met.	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of training were maintained by the mill and estates and were made available for verification. The following records were verified:</p> <p>Pinang Emas Estate</p> <ol style="list-style-type: none"> 1. Emergency Response Plan briefing dated 24/09/2024 2. Fire Drill Training dated 24/09/2024 3. First Aid Training dated 23/09/2024 4. Waste Management and Triple Rinsing dated 15/04/2024 5. Hearing Conservation Training dated 09/10/2024 	Complied

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		<p>6. PPE Training dated 23/04/2024</p> <p>Sungai Tong Palm Oil Mill</p> <ol style="list-style-type: none"> 1. Work Agreement, Annual Leave, and Salary Calculation Training dated 06/10/2024 2. Schedule Waste Handling Training dated 19/08/2024 3. Hearing Conservation Training and Audiometric Result Briefing dated 18/08/2024 4. Fire Drill and ERP Training dated 24/07/2024 5. SOP Press and Oil Room Training dated 30/07/2024 6. PPE Training dated 22/07/2024 7. First Aider Training dated 16/07/2024 <p>Jerangau Estate</p> <ol style="list-style-type: none"> 1. Schedule Waste Handling Training dated 19/07/2024 2. Chemical Handling Training dated 18/05/2024 3. First Aid Training dated 09/07/2024 4. Emergency Procedure Training dated 17/07/2024 5. Hearing Conservation Training dated 03/09/2024 <p>Tayor Estate</p> <ol style="list-style-type: none"> 1. PPE Training dated 16/01/2024 	
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		<ol style="list-style-type: none"> 2. RSPO/MSPO Training dated 05/06/2024 3. First Aid Training dated 26/08/2024 4. Schedule Waste Management Training dated 14/07/2024 5. Chemical Handling Training dated 07/08/2024 6. Fire Drill, Emergency Response Team, and Fire Extinguisher Training dated 10/06/2024 <p>Fikri Estate</p> <ol style="list-style-type: none"> 1. Biodiversity and Environment Policy training dated 26/03/2024 2. Harvesting Training - SOP & PPE dated 11/06/2024 3. First Aid Training dated 14/07/2024 4. Fire Fighting and ERP Training dated 04/09/2024 5. Chemical Handling Training dated 10/09/2024 	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The mill has designated personnel involved in supply chain certification and established a committee, as per the appointment letter signed by the Mill Manager. The identified personnel and committee members include Assistant Managers, Weighbridge Clerks, Operation Supervisors, Laboratory Analysts, FFB Graders, and Auxiliary Police.</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 13/08/2024.</p>	Complied

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Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	NA as the mill opted for Mass Balance Module	Not Applicable
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Sungai Tong POM received and processed both RSPO-certified and uncertified FFB from plantations/estates, outgrowers, and FFB traders, but only claims the volume of palm oil products produced from certified FFB processing as MB certified.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date is reported in the summary in Table 10.	Complied

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3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <table><tr><td>Member Name</td><td>Sg Tong Palm Oil Mill</td></tr><tr><td>Member ID</td><td>RSPO_ PO1000001113</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 (26/03/2024 – 26/12/2024)</td></tr></table>	Member Name	Sg Tong Palm Oil Mill	Member ID	RSPO_ PO1000001113	RSPO Membership Number	1-0095-11-000-00	Type of Business	Oil mill	Licence Status	Active (26/03/2024 – 26/12/2024)	Complied
Member Name	Sg Tong Palm Oil Mill												
Member ID	RSPO_ PO1000001113												
RSPO Membership Number	1-0095-11-000-00												
Type of Business	Oil mill												
Licence Status	Active (26/03/2024 – 26/12/2024)												
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p>	<p>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <p>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:</p> <ul style="list-style-type: none">• Introduction• Objectives• Responsibilities• Control Of Documents and Records• Delivery Of Fresh Fruit Bunches (FFB) From the Estate• Receiving FFB at the Mill	Complied										

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	<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"> • 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> <p>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 contamination since Sg Tong POM received uncertified FFB.</p>	
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		Record of Mass Balance was maintained for recording certified and non-certified of 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 North 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 09/07/2024. There is no Non-Conformity Reports (NCR) were raised for Sg Tong 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 systematic approach to internal audit processes, corrective actions, and continuous improvement within the management.</p>	Complied

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). Sg Tong 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 Sg Tong Pom Supply Bases)</p> <table><tr><td>Estate</td><td>Fikri Estate</td><td>Pelung Estate</td></tr><tr><td>Certified No</td><td>595564</td><td>595564</td></tr><tr><td>Date</td><td>29/05/2024</td><td>18/05/2024</td></tr><tr><td>Ticket No</td><td>STP2437XXXX</td><td>STP2437XXXX</td></tr><tr><td>Vehicle No</td><td>TAUXXXX</td><td>SWHXXXX</td></tr><tr><td>Field / Block</td><td>PM98B2S</td><td>PM19A2P</td></tr><tr><td>Weight, MT</td><td>6.40 MT</td><td>7.28 MT</td></tr></table> <p>Non Certified Crop</p> <table><tr><td>Estate</td><td>FELDA Belara</td><td>HADI Plantation</td></tr><tr><td>Date</td><td>24/04/2024</td><td>30/04</td></tr></table>	Estate	Fikri Estate	Pelung Estate	Certified No	595564	595564	Date	29/05/2024	18/05/2024	Ticket No	STP2437XXXX	STP2437XXXX	Vehicle No	TAUXXXX	SWHXXXX	Field / Block	PM98B2S	PM19A2P	Weight, MT	6.40 MT	7.28 MT	Estate	FELDA Belara	HADI Plantation	Date	24/04/2024	30/04	Complied
Estate	Fikri Estate	Pelung Estate																												
Certified No	595564	595564																												
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		<table><tr><td>Ticket No</td><td>STP2437XXXX</td><td>STP2437XXXX</td></tr><tr><td>Vehicle No</td><td>VAWXXXX</td><td>TCH4889</td></tr><tr><td>Field / Block</td><td>002G02</td><td>-</td></tr><tr><td>Weight, MT</td><td>5.93 MT</td><td>2.52 MT</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>	Ticket No	STP2437XXXX	STP2437XXXX	Vehicle No	VAWXXXX	TCH4889	Field / Block	002G02	-	Weight, MT	5.93 MT	2.52 MT	
Ticket No	STP2437XXXX	STP2437XXXX													
Vehicle No	VAWXXXX	TCH4889													
Field / Block	002G02	-													
Weight, MT	5.93 MT	2.52 MT													
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;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;	<p>TDM Sg Tong POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - MB</p> <ul style="list-style-type: none">a) The name and address of the buyer; BUYERXXXXXXb) The name and address of the seller; TDM Sg Tong POMc) The loading or shipment / delivery date; 26/05/2024d) The date on which the documents were issued; 26/05/2024e) RSPO Certificate Number: RSPO595564f) A description of the product: CPO MBg) The quantity of the products delivered; 43.31MTh) Any related transport documentation; BMHXXXXi) A unique identification number: STS2406XXXX <p>PK - MB</p>	Complied												

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	<ul style="list-style-type: none"> h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; TDM Sg Tong POM c) The loading or shipment / delivery date; 02/04/2024 d) The date on which the documents were issued; 02/04/2024 e) RSPO Certificate Number: RSPO595564 f) A description of the product: PK MB g) The quantity of the products delivered; 43.80MT h) Any related transport documentation; TBBXXXX i) A Unique identification number: STS2406XXXX 	
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 that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. 	<p>TDM Sg Tong 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 Sg Tong POM was for CPO and PK transportation. ii. Sighted the contract agreement between TDM Sg Tong POM and contractor: <ul style="list-style-type: none"> a) TDM Sg Tong POM has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB Supplier Certified and Non-Certified. The contract agreement and details like MPOB licence were kept in the file. 	Complied

	<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>b) Refer Contract Agreement between TDM Sg Tong POM and CPO Transportation MXXXX AXXXXXX Sdn Bhd 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 13/08/2024.</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
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	Complied

		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.	
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. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock. 	<p>Sg Tong 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) Not applicable since TDM Sg Tong POM was implement MB Module. iv) Based on verification of MB accounting which the mill opted for real time basis recording, it was found that the certified CPO was always delivered from positive stock. There was no short sale recorded within the last review period. 	Complied

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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 – Sept 2024</td><td>19.24%</td><td>4.49%</td></tr></table>	Month	OER	KER	Oct 2023 – Sept 2024	19.24%	4.49%	Complied
Month	OER	KER							
Oct 2023 – Sept 2024	19.24%	4.49%							
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>As per interviewed with Mill Manager, the mill will announce the percentage of OER and KER every day (morning) if there is a process carried out every day. Conversion factor of CPO and PK production is depending on the actual OER and KER. The conversion factors were reported daily in the Daily Production Report.</p> <p>Each month the mill will announce the average rate for OER and KER to the relevant parties. Sighted the summary report prepared by Mill Manager.</p>	Complied						
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Not applicable. Sungai Tong Palm Oil Mill is under mass balance module</p>	Complied						
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>Registration of transactions</p> <p>i) The registration of PalmTrace is carried out by TDM Trading, HQ. All transaction will be registered in the PalmTrace. Verified the registration of CPO Sale and PK Sale.</p> <p>ii) There is no RSPO certified CPO and PK has been sold as conventional. Id any RSPO Certified Volumes Sold under as</p>	Complied						

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	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.	different scheme or conventional it will removed in the IT Platform by Trading Department.	
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>	RSPO trademark was not used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a “non-product related” claim.	<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.tdemberhad.com.my/who-we-are/plantation-division/</p> <p>Trademark licence was valid as below:</p> <p>Licence No: 1-0095-11-100-00</p> <p>Validity: 27/09/2024 – 26/09/2026</p>	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <p>A. display its RSPO membership status</p> <p>B. display the RSPO web address (www.rspo.org)</p> <p>C. state that the member supports the work of RSPO</p> <p>D. state the member’s history with regard to RSPO</p> <p>E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership</p>	From the TDM Plantation Sdn. Bhd. (TDMP) official website verified that the statement all is done accordingly the requirement.	Complied

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4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	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
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." 	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".	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>Sg Tong 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>B. Claim statements are limited to the following examples:</p> <p>i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)."</p> <p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".</p>		
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

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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	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • 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. 	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
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	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
5.2 Off pack claims			

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5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	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.	Complied
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	<p>TDM Sg Tong POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - MB</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; TDM Sg Tong POM c) The loading or shipment / delivery date; 26/05/2024 d) The date on which the documents were issued; 26/05/2024 e) RSPO Certificate Number: RSPO595564 f) A description of the product: CPO MB g) The quantity of the products delivered; 43.31MT h) Any related transport documentation; BMHXXXX i) A unique identification number: STS2406XXXX <p>PK - MB</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 Sg Tong POM 	Complied

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		c) The loading or shipment / delivery date; 02/04/2024 d) The date on which the documents were issued; 02/04/2024 e) RSPO Certificate Number: RSPO595564 f) A description of the product: PK MB g) The quantity of the products delivered; 43.80MT h) Any related transport documentation; TBBXXXX i) A Unique identification number: STS2406XXXX	
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 Sg Tong 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	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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	purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.		
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • 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>	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
	<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>	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
	<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>	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
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* 	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.	Complied

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	<ul style="list-style-type: none"> • 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>	Consequently, further assessment of this requirement cannot be conducted.	
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 B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	The oil palm content for both CPO and PK is 100% RSPO MB certified. No non-certified oil palm content was mixed when the MB claim was made.	Complied

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	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Sungai Tong POM exclusively uses the MB model, and conventional CPO is downgraded from MB status whenever required.	Complied
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. • The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	No RSPO labels or storytelling are used in product-related communications, as CPO and PK are considered semi-finished products.	Complied
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • The RSPO Label MUST contain the tag "MIXED." The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. 	TDM Sungai Tong POM does not use any RSPO trademark or logo in general corporate communications or statements that might lead consumers to believe that RSPO membership alone implies the sale of RSPO certified palm oil products. If needed or required, this will be handled at the TDM Plantation Head Office level.	Complied

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	<ul style="list-style-type: none"> The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 		
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Documented in the document title "Polisi Sosial" dated 23/02/2023 signed by the chief executive officer, Mr Hamdan bin Ibrahim. Stated in the policy that the management is committed to treat all the workers, job applicators and contractor equally and to ensure equal opportunities that recruitment, development, promotion regardless race/ethnic, skin colour, physical condition, religion, gender, age, marital status, family background and political background.</p> <p>Documented in the document "Polisi Jantina" dated 23/02/2023 signed by the chief executive officer, Mr Hamdan bin Ibrahim. Stated in the policy that the management committed to protect all workers from any harassment, retaliation, violence.</p> <p>The procedure has been communicated to all workers for all operating units during the morning muster call and stakeholders during the stakeholders' consultations on 10/09/2024.</p> <p>Interview with sample workers and stakeholders confirmed that they have been communicated with the policy and able to demonstrate their understanding.</p>	Complied
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>Verification has been done through site visit and interview confirmed that there all the operating units did not used any violence or harassment in the operations. Respond from sample</p>	Complied

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		workers and stakeholders mentioned that they has been treated very well.	
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>	Procedure for grievance has been documented in the document title Stakeholder communication (Grievance, complaints & information request) document number TDMP/02 revision 01/2022. Stated in procedure that the management will protect anonymity of complainant, HRD, community spokesperson and whistle blower.	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>There are few of illiterate workers has been identified during the interview for all operating units. According to the interviews, all of the workers were able to demonstrate their understanding of the established procedures.</p> <p>Communication of the procedure has been communicated during morning muster briefing and verified based on the communication records.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	All operating units under Sungai Tong POM did not receive any complaint which has been verified based on Buku aduan dan Cadangan. This was further confirmed through interviews with sampled workers and stakeholders. For any cases of housing repair, it has been recorded under Complaint Form and sighted that all the issues report has been responded with 7 days from the days received.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to	Conflict resolution mechanism is defined in the flowchart named Communication Procedure – TDMP/02, rev:01/2022 dated 1/10/2022. Flow chart @ Carta Aliran Pendendalian Isu Social (Stakeholder) (Aduan / Rungutan / Permohonan) / Social issues	Complied

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	choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	Flowchart (stakeholders) (Complaint/Application), incorporated in the SOP under appendix 1. Mediation included in consultation process for resolution which to allow party to be represented as in this case, union @ NUPW or other personnel appointed/chosen by the complainant. As for external party, they can choose any person to act as observers, as well as the option of a third-party mediator.	
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	There is evidence contribution has been made by operating units as per requested by the stakeholders. This has been confirmed based on records of contribution and interview with sampled stakeholders. 1. Donation to SMK Landas dated 20/08/2024 for student camping activities. 2. Donation to SK Landas on 10/09/2024 for educational visit 3. Donation to Jerangau Police Station for independent day activities 4. Donation to JPKK Kampung Tok Dor on 04/08/2024 for local communities' activities. 5. Assistance to clean waste at Kampung Pok Ba bridge 6. Donation to Appreciation Day and Graduation Day for SK Tayor. 7. Providing MPKK Kampung Tayor Tengah with tractor.	Complied
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the	Land titles are available to demonstrate evidence of land leases. The land titles contain information on lessee, hectarage, terms and conditions of lease period and grant numbers.	Complied

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	<p>history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The following land titles were sampled:</p> <p>Pinang Emas Estate</p> <table><tr><th>Land title no</th><th>Lot No.</th><th>Hectarage</th></tr><tr><td>HSD 74</td><td>1140</td><td>738.15</td></tr><tr><td>HSD 75</td><td>1143</td><td>621.60</td></tr><tr><td>HSD 76</td><td>1144</td><td>284.90</td></tr><tr><td>HSD 77</td><td>1145</td><td>336.70</td></tr><tr><td>HSD 72</td><td>140 (Lot 3999)</td><td>1226.82</td></tr><tr><td>HD 73</td><td>141</td><td>302.03</td></tr></table> <p>Jerangau Estate</p> <table><tr><th>Land title no</th><th>Lot No.</th><th>Hectarage</th><th>Tenure</th></tr><tr><td>12803</td><td>37</td><td>456.89</td><td>Leased for 92 years until 31/12/2048</td></tr><tr><td>12809</td><td>61326</td><td>36.59</td><td>Leased for 92 years until 31/12/2048</td></tr><tr><td>12816</td><td>1157</td><td>580.5221</td><td>Leased for 99 years until 14/09/2044</td></tr></table>	Land title no	Lot No.	Hectarage	HSD 74	1140	738.15	HSD 75	1143	621.60	HSD 76	1144	284.90	HSD 77	1145	336.70	HSD 72	140 (Lot 3999)	1226.82	HD 73	141	302.03	Land title no	Lot No.	Hectarage	Tenure	12803	37	456.89	Leased for 92 years until 31/12/2048	12809	61326	36.59	Leased for 92 years until 31/12/2048	12816	1157	580.5221	Leased for 99 years until 14/09/2044	
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		10735	4050	406.90	Leased for 60 years until 26/10/2044																												
<p>*Renewal has been made</p> <p>Fikri Estate</p> <p>There are 23 land titles for Fikri Estate updated on 13/06/2024 prepared by Noreezatul Aiza bt Musa. Sample has been taken as per below.</p> <table><tr><td>Land title no</td><td>Lot No.</td><td>Hectarage</td></tr><tr><td>1007</td><td>17717</td><td>0.20</td></tr><tr><td>3974</td><td>9390</td><td>472.00</td></tr><tr><td>6838</td><td>12033</td><td>79.84</td></tr><tr><td>6416</td><td>10939</td><td>15.16</td></tr></table> <p>Tayor Estate</p> <p>There are 9 land titles for Tayor Estate. The land has been leased from Perbadanan Memajukan Iktisad Negeri Terengganu dated 07/02/2018 for 99 years. Sample as per below.</p> <table><tr><td>Land title no</td><td>Lot No.</td><td>Hectarage</td></tr><tr><td>GM617</td><td>97</td><td>1.1153</td></tr><tr><td>GM1533</td><td>54</td><td>1.8110</td></tr><tr><td>GM1546</td><td>94</td><td>1.7349</td></tr></table>							Land title no	Lot No.	Hectarage	1007	17717	0.20	3974	9390	472.00	6838	12033	79.84	6416	10939	15.16	Land title no	Lot No.	Hectarage	GM617	97	1.1153	GM1533	54	1.8110	GM1546	94	1.7349
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		GM3157	1140	3.0377		
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	As reflected earlier in indicator 4.4.1, all operating units under Sungai Tong POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs/leased to TDM Plantation Sdn Bhd. Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.				Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	As reflected earlier in indicator 4.4.1, all operating units under Sungai Tong POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs/leased to TDM Plantation Sdn Bhd. Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.				Complied
4.4.2b	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 units under Sungai Tong POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs/leased to TDM Plantation Sdn Bhd. Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring				Complied

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		estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	
4.4.2c	<p>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.</p> <p>- Minor compliance -</p>	<p>As reflected earlier in indicator 4.4.1, all operating units under Sungai Tong POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs/leased to TDM Plantation Sdn Bhd.</p> <p>Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.</p>	Complied
4.4.3	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>As reflected earlier in indicator 4.4.1, all operating units under Sungai Tong POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs/leased to TDM Plantation Sdn Bhd.</p> <p>Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>As reflected earlier in indicator 4.4.1, all operating units under Sungai Tong POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs/leased to TDM Plantation Sdn Bhd.</p> <p>Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring</p>	Complied

		estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	
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 -	As reflected earlier in indicator 4.4.1, all operating units under Sungai Tong POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs/leased to TDM Plantation Sdn Bhd. Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	As reflected earlier in indicator 4.4.1, all operating units under Sungai Tong POM have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs/leased to TDM Plantation Sdn Bhd. Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
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 -	There is no customary rights has been identified that has been confirmed based on document review and interview. Land has been acquired by TDM Plantation Sdn Bhd or leased from Perbadanan Memajukan Iktisad Negeri Terengganu for 99 years. Sample of pay slips as per below	Complied

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		Pinang Emas Estate				
		Land title no	Lot No.	Hectarage		
		HSD 74	1140	738.15		
		HSD 75	1143	621.60		
		HSD 76	1144	284.90		
		HSD 77	1145	336.70		
		HSD 72	140 (Lot 3999)	1226.82		
		HD 73	141	302.03		
		Jerangau Estate				
		Land title no	Lot No.	Hectarage	Tenure	
		12803	37	456.89	Leased for 92 years until 31/12/2048	
		12809	61326	36.59	Leased for 92 years until 31/12/2048	
		12816	1157	580.5221	Leased for 99 years until 14/09/2044	

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		<table><tr><td>10735</td><td>4050</td><td>406.90</td><td>Leased for 60 years until 26/10/2044</td></tr></table> <p>Fikri Estate</p> <p>There are 23 land titles for Fikri Estate updated on 13/06/2024 prepared by Noreezatul Aiza bt Musa. Sample has been taken as per below.</p> <table><tr><td>Land title no</td><td>Lot No.</td><td>Hectarage</td></tr><tr><td>1007</td><td>17717</td><td>0.20</td></tr><tr><td>3974</td><td>9390</td><td>472.00</td></tr><tr><td>6838</td><td>12033</td><td>79.84</td></tr><tr><td>6416</td><td>10939</td><td>15.16</td></tr></table> <p>Tayor Estate</p> <p>There are 9 land titles for Tayor Estate. The land has been leased from Perbadanan Memajukan Iktisad Negeri Terengganu dated 07/02/2018 for 99 years. Sample as per below.</p> <table><tr><td>Land title no</td><td>Lot No.</td><td>Hectarage</td></tr><tr><td>GM617</td><td>97</td><td>1.1153</td></tr><tr><td>GM1533</td><td>54</td><td>1.8110</td></tr></table>	10735	4050	406.90	Leased for 60 years until 26/10/2044	Land title no	Lot No.	Hectarage	1007	17717	0.20	3974	9390	472.00	6838	12033	79.84	6416	10939	15.16	Land title no	Lot No.	Hectarage	GM617	97	1.1153	GM1533	54	1.8110	
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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	Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in all operating	Complied																												

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	<p>communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>units under Sungai Tong POM. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under all operating units under Sungai Tong POM, there has been no new planting on local people's land since the last assessment.</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>Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in all operating units under Sungai Tong POM. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under all operating units under Sungai Tong POM, there has been no new planting on local people's land since the last assessment.</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>Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in all operating units under Sungai Tong POM. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under all operating units under Sungai Tong POM, there has been no new planting on local people's land since the last assessment.</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,</p>	<p>Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in all operating</p>	Complied

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	<p>environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>units under Sungai Tong POM. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under all operating units under Sungai Tong POM, there has been no new planting on local people's land since the last assessment.</p>	
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in all operating units under Sungai Tong POM. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under all operating units under Sungai Tong POM, there has been no new planting on local people's land since the last assessment.</p>	Complied
4.5.7	<p>New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p> <p>- Minor compliance -</p>	<p>Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in all operating units under Sungai Tong POM. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under all operating units under Sungai Tong POM, there has been no new planting on local people's land since the last assessment.</p>	Complied
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in all operating</p>	Complied

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		<p>units under Sungai Tong POM. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under all operating units under Sungai Tong POM, there has been no new planting on local people's land since the last assessment.</p>	
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area. Documented procedure is in place as per document title Standard Operating Procedure B7: Land disputes revision Feb 2017 that states the process of resolve the land dispute issues.</p> <p>Objectives of the procedure is to ensure the land dispute is resolved in timely manner. Types of disputes are such as disputes over land boundaries, conflicts with landowners and land ownerships. Verification process of conflict will be carried out and affected stakeholders need to be informed. Compensation and negotiation process will be carried out as per the mutual agreement of both parties.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Documented procedure is in place as per document title Standard Operating Procedure B7: Land disputes revision Feb 2017 that states the process compensation process.</p>	Complied

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4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all operating units under Sungai Tong POM. This has also been evident through interview with the local communities.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all operating units under Sungai Tong POM. This has also been evident through interview with the local community	Complied
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.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area. Documented procedure is in place as per document title Standard Operating Procedure B7: Land disputes revision Feb 2017 that states the process of resolve the land dispute issues. Objectives of the procedure is to ensure the land dispute is resolved in timely manner. Types of disputes are such as disputes over land boundaries, conflicts with landowners and land ownerships. Verification process of conflict will be carried out and affected stakeholders need to be informed. Compensation and negotiation process will be carried out as per the mutual agreement of both parties.	Complied
4.7.2	(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.	Documented procedure is in place as per document title Standard Operating Procedure B7: Land disputes revision Feb 2017 that states the process compensation process.	Complied

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	- Critical (Major) compliance -		
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	There is no customary right land for all operating unit under Sungai Tong POM. No evidence that community have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues.	Complied
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	There is no customary right land for all operating unit under Sungai Tong POM. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
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 -	There is no customary right land for all operating unit under Sungai Tong POM. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use	There is no customary right land for all operating unit under Sungai Tong POM. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and	Complied

	rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	neighbouring smallholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	There is no customary right land for all operating unit under Sungai Tong POM. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	FFB prices, both current and previous, are displayed at the weighbridge office for supplier reference, with price calculations available upon request. Pricing for collection centres is based on contract agreements, and an explanation is provided upon signing. Suppliers can make enquiries about prices via phone calls or in-person meetings.	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 explanation about FFB pricing is typically provided during stakeholder meetings or upon request. Minutes of the meeting are available for verification from the stakeholder meeting held on 13/06/2024 between the FFB suppliers and the management of TDM.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	The pricing of FFB is determined by the MPOB Monthly Average Price for CPO and PK, along with the OER and KER issued by Sungai Tong POM. This can be confirmed by reviewing the Self Billed	Complied

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		Invoice given to the FFB suppliers. Since the last assessment, there have been no complaints reported concerning unfair pricing.	
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	There are no smallholders directly associated with the Sungai Tong certification unit, as it receives FFB from outgrowers and FFB traders.	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contract agreements between Sungai Tong POM and its FFB suppliers were made available for verification. The agreements included various terms and conditions, such as FFB pricing, payment methods and timelines, FFB quality, and legal compliance obligations, among others. Signatures from both parties were clearly present in the agreements, and to date, there have been no grievances regarding unfairness in the contracts.</p> <p>Samples of the Sales and Purchase Agreements for the purchase of FFB are as follows:</p> <ol style="list-style-type: none"> 1. NX Agrixxxxxxx Sdn Bhd – Ref No: TDMP/OD/OCP/24 – Dated 29/08/2024 2. Haxx Plantxxxxx Sdn Bhd – Ref No: TDMP/)D/OCP/240930-06 – Dated 20/09/2024 3. Syarxxxx Warxxxx – Ref No: TDMP/OD/OCP/24 – Dated 29/08/2024 	Complied

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5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Sungai Tong POM ensures timely payments to its external FFB suppliers in accordance with the terms outlined in the contract agreement. The pricing mechanism for purchasing FFB from suppliers has been documented and agreed upon by both the mill and the supplier. The mill provides payment calculations to the Plantation Management Department on a monthly basis. A sample for the month of August 2024 was sighted, with reference number PTK/1/01.01 dated 03/09/2024.</p> <p>Samples of the invoices from selected suppliers are as follows:</p> <ol style="list-style-type: none"> 1. Syarxxxx Warxxxx – Invoice No: 00000089 dated 31/07/2024 – RM XXXX.XX 2. Haxx Plantxxxxx Sdn Bhd – Invoice No: HPSB/TDM/AUG/2024 dated 10/09/2024 – RM XXXX.XX 3. NX Agrixxxxxxx Sdn Bhd – Invoice No: IV2024080009 dated 31/08/2024 – RM XXXX.XX 	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Weighbridges were calibrated on an annual basis to ensure no discrepancies in the payments made to the FFB suppliers. Calibration details are as follows:</p> <p>Weighbridge 1</p> <p>No. Siri Alat: B849884849;</p> <p>Receipt Number: B2188627</p> <p>Description: MPK(E) Mettler Toleou IND780, 70,000 Kg;</p> <p>Conducted By: Metrology Corporation Malaysia Sdn Bhd</p> <p>Date: 04/09/2024</p>	Complied

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		Weighbridge 2 No. Siri Alat: E27322-0005 Receipt Number: B2188265 Description: MPK(E) Cardinal 205 80,000 Kg Conducted By: Metology Corporation Malaysia Sdn Bhd Date: 13/06/2024	
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	There are no smallholders directly associated with the Sungai Tong certification unit, as it receives FFB from outgrowers and FFB traders. The management has also conducted the "Program Ladang Sahabat TDM" on 06/05/2024 with MPOB to connect with smallholders.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	There are no smallholders directly associated with the Sungai Tong certification unit, as it receives FFB from outgrowers and FFB traders.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	There are no smallholders directly associated with the Sungai Tong certification unit, as it only sources Fresh Fruit Bunches (FFB) from outgrowers and FFB traders.	Not Applicable

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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 -	There are no smallholders directly associated with the Sungai Tong certification unit, as it only sources Fresh Fruit Bunches (FFB) from outgrowers and FFB traders	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders directly associated with the Sungai Tong certification unit, as it only sources Fresh Fruit Bunches (FFB) from outgrowers and FFB traders	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders directly associated with the Sungai Tong certification unit, as it only sources Fresh Fruit Bunches (FFB) from outgrowers and FFB traders	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders directly associated with the Sungai Tong certification unit, as it only sources Fresh Fruit Bunches (FFB) from outgrowers and FFB traders	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(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. - Critical (Major) compliance -	TDM Plantation Sdn Bhd has revised the new Human Rights Policy / Polisi Hak Hak Asasi Manusia and Social Policy/Polisi Sosial dated 23 rd February 2023 by the new CEO. These policies stated the management commitment to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, gender etc.	Complied

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6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>There is evidence that there are no parties has been discriminated by the management where it has been confirmed through interview, site visit and records review. Sample has been taken for women workers where they have been treated equally as other workers where there has been paid equally with other workers which work as same job scope and entitle with the same benefits.</p> <p>All foreign workers have been allocated at the same housing compound and received same benefits regardless of the origin. There are no recruitment fees has been charged to all foreign workers that has been recruited in year 2024. It has been confirmed through interview with the new recruited 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>- Minor compliance -</p>	<p>There is evidence that operating units has demonstrate that recruitment base on capabilities and qualities which has been verified during the interview by the operating units and for foreign workers at the origin countries. Sample of 12 workers has been taken from Indonesia and Malaysia, races and gender and has been verified based on interview, and documentation such as medical checkup and interview records.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>There is no pregnancy test has been done in all operating units. It has been confirmed through interview with Hospital Assistant and female workers. If there is any cases of delaying on menstrual, hospital assistant will advised the female workers to conducted test to nearest government health clinic.</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>For Pinang Emas Estate, gender committee has been established and chaired by Puan Rohana binti Zakaria. Meeting has been conducted every 3 months and latest meeting has been done on 13/03/2024, 13/06/2024 and 19/09/2024.</p>	Complied

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		<p>For Sungai Tong POM, gender committee has been established which has been chaired by Cik Syazwani binti Muhammad. Several activities have been conducted to improve opportunities such as Kursus Pengurusan Jenazah and Quran reciting activities on weekly basis.</p> <p>Jerangau Estate has appointed Puan Norazah Wahab as chairman with other representative from the management and workers. Latest meeting has been conducted 11/03/2024, 25/06/2024 and 25/09/2024.</p> <p>For Ladang Fikri, Puan Siti Norasiah Aladin, has been appointed as chairman. Latest meeting has been done on 10/09/2024 and 27/06/2024.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>As verification through sample of pay slips taken for month April 2024, June'2024 and August'24 confirmed that all workers has been paid equally. All workers have been paid either based on daily rate (RM57.69/day) according to Minimum Wages Order or Piece rate (as per MAPA- NUPW collective agreement and employment contract). Interview with sample workers, confirmed the statement.</p>	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Collective agreement sighted between MAPA NUPW and the members of MAPA and sighted in the document MAPA/NUPW filed and other general employee and fringe benefits, 2019. Latest collective agreement is still at Industrial Court. Other than that, the management of all operating units adopt Employment Act 1955 and Minimum Wages Order 2022. All workers has been provided with employment contract and sample has been taken there is evidence</p>	Complied

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		<p>that has been signed by both parties. The employment contract has been established in Bahasa Malaysia, English, Tamil.</p> <p>There is evidence that it has been explained to all workers and verified based on training records and interview with ample workers.</p>	
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>Payment details and employment terms are clearly outlined and formally recorded in employment contracts provided to all employees. These contracts encompass various aspects, such as the employment duration, working hours, overtime policies, annual and medical leave entitlements, public holiday arrangements, mutual termination provisions, maternity benefits, and more. Importantly, these terms are in strict adherence to the Sabah Labour Ordinance, the Minimum Wages Order of 2020, the SOCSO Act of 1969, the EPF Act of 1991, the EIS Act of 2017, and the MAPA/NUPW agreement.</p> <p>Additionally, payroll documents, specifically payslips, provide accurate and comprehensive information regarding compensation for all labor performed. This encompasses individuals receiving daily-rated wages, piece-rated wages, payments for any overtime work, and remuneration for public holidays. Furthermore, our examination of sampled payslips confirms that all wages were disbursed in full compliance with the applicable national legal requirements. Salary deductions and overtime payments align with the stipulations of the relevant laws, including SOCSO, EPF, EIS, and are also in accordance with Labor Office permits.</p> <p>Stated in the employment contract working hours, deduction, overtime and leave entitlement. Mentioned in the employment contract that entitlement of leave is depending on the length of service. For workers less than 2 years services, they are entitled for 14 days of sick leave and 8 days of annual leave. Highlighted in the</p>	Complied

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		contract reasons for dismissal, period of notice and other legal labour requirements.	
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>Verification has been done by auditor on legal compliance-based sample of 22 pay slips, employment contract and interview with sample workers. There is evidence that all operating units comply with legal requirement (Employment Act 1955, Minimum wages order 2022 etc).</p> <p>Working hours- 7.5 hours from 0630hrs until 1400hrs. POM- divided into 2 Shift (0800hrs until 1530hrs (7.5 Hours) and 1530hrs until 2300hrs (7.5 Hours))</p> <p>Deduction- Deduction for EPF, SOCSO, water and electricity, Hajj savings (as per requested)</p> <p>Overtime- Overtime has been paid at 1.5 and has been monitored based on overtime monitoring form</p> <p>Sick leave- Sick leave has been paid based on period of employment.</p> <p>Annual leave- Voluntary Leave Pa (VLP) for month January until March 2024 in August 2024 and April-June 2024 in September 2024. Payment based Ordinary rate pay (ORP)</p> <p>Maternity leave- 98 days</p> <p>Period of notice- 1 month</p> <p>As stated in the collective agreement MAPA-NUPW in clause 33 – Accommodation that employee for whom no approved accommodation is available shall be entitle to a pavement of RM125/month. Sample of pay slips has been taken for month September 2024, sighted that all sample workers agreed not stay</p>	OFI

		<p>at housing compound due to location of the estate nearby to their own house. While for Sungai Tong Palm Oil Mill,</p> <p>Stated in the article 280 services gratuity benefits, the employee shall entitle to as services gratuity benefits. Sample has been taken for workers retired 09/02/2024 where services gratuity benefits has been paid on 04/04/2024 and calculations has been paid as per outline in the collective agreement.</p> <p>Directive from the management for Sungai Tong POM to pay the accommodation allowance (RM125/month) as per stated in the MAPA-NUPW collective agreement. Census has been done by the management to identify workers that eligible for the allowance and submitted to human resources department for approval. OFI has been raised to ensure that the allowance has been paid according to MAPA- NUPW collective agreement. Thus, OFI has been raised.</p>	
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>Housing quarters has been provided to all workers with free water that has been provided by government water supply. Electricity provided though Tenaga Nasional Berhad and will be deducted through monthly salary based on the usage. The is government primary school nearby the operating. Free transportations has been provided to all kid who parents working with Sungai Tong POM. The management established creche for kids with caretaker for free. Other than that sport facilities has been established. Fikri Estate, Tayor Estate and Sungai Tong POM shared clinic and medical assistant.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Pinang Emas Estate</p> <p>There is 1 grocery store has been established in the estate compound which selling basic needs such as wet food (fish and</p>	Complied

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		<p>chicken), dried food, etc. Pinang Emas Estate located nearby to local communities (less than 5km) which there are several sundry stores.</p> <p>Sungai Tong POM/Fikri Estate/ Tayor Estate</p> <p>Sungai Tong POM and Fikri Estate located nearby to Sungai Tong town which located around 10km from the operating units. Other alternative, is sundry shops located nearby POM (less than 1km) which is at Kampung Bukit Nenas.</p>	
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><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</p>	<p>DLW has been calculated for both estates and POM and has been documented in the document Prevailing Wage Assessment and has been verified by the auditor. The calculation has been done by including information on any additional allowance, services and facilities provided such as housing and medical facilities, and etc. The calculation has taken Minimum Wages Order 2022 as guidance and baseline. Sample of pay slips has been taken for month April'24, June'24 and August'24 for each operating units and found that all the workers has been paid as per DLW.</p>	Complied

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	<p>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>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>All core activities such as milling activities, harvesting, chemical spraying and fertilizer application were performed by the permanent employee.</p> <p>Sighted during site visit, each operating unit is using SAP (System Application and Product in Data Processing) system to maintain and update the administration and operation information. By using the</p>	Complied

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		<p>SAP, each operating unit has established 'Employee Master List' which includes an information such as:</p> <ul style="list-style-type: none"> • Employee number • Full name • Date of Birth • Nationality • Date of Join • Employment Status • Race <p>Each visited operating unit has appointed a contractor for hiring machinery, FFB transport and replanting. 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.</p>	
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Documented in the document title "Polisi Kebebasan Berpersatuan" dated 23/02/2023 signed by the chief executive officer, Mr Hamdan bin Ibrahim. Stated in the policy that the management is committed to allow workers rights to form and participate for any activities conducted by the trade union.</p>	Complied

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		<p>Sungai Tong POM</p> <p>There is evidence that some of the workers of Sungai Tong POM is a member of National Union Plantations Workers (NUPW) and sighted based on "senarai potongan kesatuan (NUPW) Bulan Julai 2024". It has been further confirmed through interview that there is no prohibition to participate and to be member of any union.</p> <p>Jerangau Estate</p> <p>There are no workers has been participated or become member for any trade union. Further interview, with sample workers confirmed that there is no prohibition by the management to become member of union but due to less interested by the workers itself. The management has taken initiative to established workers representative as alternative to the trade union. This has been verified based on the election process, minutes meetings, and role and responsibilities as workers representative. Communication of the policy has been done to all workers during the morning muster call on 23/01/2024.</p> <p>Fikri Estate</p> <p>There is evidence that some of the workers of Sungai Tong POM is a member of National Union Plantations Workers (NUPW) and sighted based on "senarai potongan kesatuan (NUPW) Bulan Julai 2024". It has been further confirmed through interview that there is no prohibition to participate and to be member of any union. The management has taken initiative to established workers representative committee that has been elected by the workers. Sighted document of election done on 10/10/2024</p>	
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in	Sungai Tong POM	Complied

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	<p>national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Minutes meeting with workers representative sighted and verified by auditor. Latest meeting conducted on 24/09/2024. Several issues have been discussed during the meeting such as budget for workers activities, request for new toilet, water tank and request repair. There is evidence that all the issues have been responded by the management and confirmed through interview.</p> <p>Jerangau Estate</p> <p>Minutes meeting with workers representative sighted. Latest meeting conducted on 22/01/2024 and 04/06/2024. Issues that has been discussed is related to additional works for extra income and overtime.</p> <p>Fikri Estate</p> <p>Minutes meeting with workers representative sighted. Latest meeting conducted on 10/10/2024 and 03/10/2024. Issues that has been discussed is related to annual leave payment, and incentive for harvesters.</p> <p>Tayor Estate</p> <p>Minutes meeting with workers representative sighted. Latest meeting conducted on 14/08/2024. Issues that has been discussed is related to housing repair and overtime.</p> <p>Minutes meetings for all operating units has been made available and documented in Bahasa Malaysia and attended by representative has been elected. Details of election process outline in the indicator 6.2.3</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely</p>	<p>There is evidence that there is no interference by the management on selection of the workers representative. This has been verified</p>	Complied

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	<p>elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>based on documentation and interview with workers representative and sample workers.</p> <p>Sungai Tong POM</p> <p>Worker's representative has been established based on gang and documentation of election process sighted document "Sesi pemilihan wakil pekerja bagi sesi 2024/2025". Sighted that the election has been done through voting during the morning muster briefing and has been confirmed through interview.</p> <p>Jerangau Estate</p> <p>Election for workers representative has been done on 22/02/2024 during the morning muster briefing and records verified "Program pemilihan wakil pekerja". The election has been done based on workers' gang. This election process included local and migrant workers.</p> <p>Fikri Estate</p> <p>Election for workers representative has been done on 10/10/2024 during the morning muster briefing and records verified "Program pemilihan wakil pekerja". The election has been done based on workers' gang. This election process included local and migrant workers.</p> <p>Tayor Estate</p> <p>Election for workers representative has been done on 14/08/2024 during the morning muster briefing and records verified "Program pemilihan wakil pekerja". The election has been done based on workers' gang. This election process included local and migrant workers.</p>	
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Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Documented in the document title "Polisi Perlindungan Kanak-Kanak" dated 23/02/2023 signed by the chief executive officer, Mr Hamdan bin Ibrahim. Stated in the policy that the management is committed to protect all children within the operation and organization environment. This includes no exploitation, involvement, usage of individual below than 18 years old. In term of services contract and supplier agreement, it has been detailed up in indicator 2.2.3.</p>	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>As per verification through sample of workers from different categories which are origin countries, gender, types of workers found that there are no workers below than minimum ages has been recruited. It has been verified based on master list, personal file and interview by the workers itself. Procedure for age screening has been established for both migrant and local workers in the recruitment procedure.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Stated in the "Polisi Perlindungan Kanak- Kanak" dated 23/02/2023 signed by the chief executive officer that no exploitation, involvement, usage of individual below than 18 years old in the business and operations. Verified through personal file, list workers, site visit and interview with sampled workers</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Stakeholders meeting has been done for all stakeholders under Sg Tong Palm Oil Mill dated 10/09/2024 that has been attended by various category of stakeholders. 'No child labour' policy has been communicated during the stakeholder's meetings by Puan Norwati bin Mamat. Stakeholder meeting was attendance by Government Agencies, FFB Supplier, Contactors hired by Mill and Estate and</p>	Complied

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		Neighbouring estates etc. as per attendance list verification While for workers, it has been communicated during the morning muster briefing. This has been demonstrated from interview conducted during interview with sampled workers and stakeholders.	
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	TDM Plantation Sdn Bhd has developed and implemented a Gender Policy, outlining the company's responsibility to uphold workers' rights. The most recent version of the policy dated 23/02/2023 signed by the chief executive officer, Mr Hamdan bin Ibrahim. The policy ensures the protection of all female workers' rights and states that immediate action will be taken if any incidents of sexual harassment, domestic violence, or other forms of harassment are reported. This policy has been communicated to all operating units during morning muster briefings, as confirmed by training records. Further verification through interviews with selected workers demonstrated their understanding of the policy.	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	The Reproductive Rights Policy and Social Policy dated 23/02/2023 signed by the chief executive officer, Mr Hamdan bin Ibrahim. This policy outlines the company's commitment to respecting workers' reproductive planning rights, ensuring their freedom to make personal decisions without interference, and preventing discrimination or harsh treatment toward affected workers. The policy has been communicated to all operating units during morning muster briefings, as confirmed by training records. Additional verification through interviews with selected workers demonstrated their understanding of the policy.	Complied

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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>Pinang Emas Estate</p> <p>There are 2 new mothers has been identified for Pinang Emas Estate and assessment has been done through quick survey provided by the estate management. There is no special request has been requested by both new mothers. As per interview, the management has provided time for breast feeding and both did not handle any chemical.</p> <p>Sungai Tong POM/ Jerangau Estate</p> <p>There is no new mother has been identified in this operating units. This has been confirmed based on the records, and interview with sample female workers. Identification of new mother will be made based on report by workers itself, quick survey done on monthly basis and report by Hospital Assistant.</p> <p>Fikri Estate</p> <p>There are 4 new mother has been identified There is no special request has been requested by both new mothers. As per interview, the management has provided time for breast feeding and both did not handle any chemical.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The "Tatacara Aduan Gangguan Seksual" (Sexual Harassment Complaint Procedure) is in place, which encourages reporting of any cases or suspected cases within 24 hours. These cases are to be investigated within 2 days and reported for action within 5 days. Interviews with the gender and workers' committee during the stakeholder consultation, as well as an individual interview with the gender committee chairperson, confirmed that no incidents of sexual harassment have ever been reported. For other forms of harassment, workers can file complaints through the established procedure, known as "Prosedur Aduan / Rungutan."</p>	Complied

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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>Polisi Sosial dated 23/02/2023 signed by Hamdan Ibrahim included the commitment to respect and uphold labour rights, under which included the commitment as required in this indicator.</p> <p>Based on interview with the sampled workers, observation, documentation review and site visit to the labour quarters and estate facilities, the following were verified:</p> <ol style="list-style-type: none"> a. Retention of identity documents or passports: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Sampled workers were interviewed and confirmed that they keep their passports themselves. This was further verified during the site visit to the labor quarters, where passport was observed to be kept in the workers houses. Furthermore, the management provides lockers for workers to keep their passport safely. The locker keys are kept by the workers with no duplicate keys held by the management. b. Charging of recruitment fee: All recruitment fees are borne by the company. Interviews conducted with sampled workers also confirmed that they have not been charged any recruitment fees. They inform that the workers can report any recruitment fees incurred by them to the management prior to departure in source countries, after arrival, during induction process and through grievance procedures. c. Based on document review, worker interview and site tour, it was noted all the migrant workers are legally recruited. Written employment contract was provided to them in a language that was understood by the workers. Explanation of terms and 	Complied

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		<p>condition in the contracts was conducted in their origin country. Interview with the sampled workers confirmed that they have entered employment by voluntarily and freely basis. They also informed that all contract signed in their origin country is consistent with the terms and condition that they received upon arrival.</p> <p>d. Involuntary overtime: Based on interviews conducted with the sampled workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work.</p> <p>e. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers. There is no term and condition for any resignation and the flight tickets will bear by the company. Verification of the repatriation records and interview with the sampled workers, shows that the workers are given freedom to going back for long leaves or going back for goods. Some workers, who have been employed in the estate and mill for 5 to 12 years, have taken long leaves 2 or 3 times during their services.</p> <p>f. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no loan/borrowing money has been given by the management to the workers. There is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement.</p> <p>g. Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by account and can be</p>	
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		withdraw at the nearest bank and sighted evidence of payment that has been signed by the workers. There is evidence that there no workers' wages have been withheld. It has been further confirmed through interview with sampled workers.	
6.6.2	(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. - Critical (Major) compliance -	The Foreign Worker Policy, dated 23/02/2023 signed by the chief executive officer, Mr Hamdan bin Ibrahim, is currently in effect. This policy outlines the company's commitment to ensuring that the recruitment of migrant workers complies with the Employment Act 1955, Immigration Act 1959/63, and Workmen's Compensation Act 1952, as well as providing fair wages in accordance with legal requirements. Based on the reviewed records, all migrant workers have been employed in compliance with legal standards and are provided with the required benefits and minimum wage.	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. - Critical (Major) compliance -	<p>All estates and the mill have appointed estate managers as OSH Chairpersons, as per appointment letters dated 01/07/2022 (Ref No: TDMP/OD/07/60-10). The Organisation Charts specify the roles of the chairman, secretary, employer representative, and employee representative across all units.</p> <p>Quarterly meetings are conducted to address safety and health issues and worker welfare. The minutes of these meetings have been verified for the following:</p> <ul style="list-style-type: none"> • Pinang Emas Estate <ul style="list-style-type: none"> ○ Quarter 03/2024 – 11/09/2024 ○ Quarter 02/2024 – 26/06/2024 	Complied

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		<ul style="list-style-type: none"> ○ Quarter 01/2024 – 26/03/2024 ○ Quarter 04/2023 – 20/12/2023 • Sungai Tong Palm Oil Mill <ul style="list-style-type: none"> ○ Quarter 03/2024 – 25/09/2024 ○ Quarter 02/2024 – 27/06/2024 ○ Quarter 01/2024 – 20/03/2024 ○ Quarter 04/2023 – 27/12/2024 • Jerangau Estate <ul style="list-style-type: none"> ○ Quarter 03/2024 – 23/09/2024 ○ Quarter 02/2024 – 26/06/2024 ○ Quarter 01/2024 – 13/03/2024 ○ Quarter 04/2023 – 12/12/2023 • Fikri Estate <ul style="list-style-type: none"> ○ Quarter 03/2024 – 15/09/2024 ○ Quarter 02/2024 – 26/06/2024 ○ Quarter 01/2024 – 26/03/2024 ○ Quarter 04/2023 – 13/12/2023 • Tayor Estate <ul style="list-style-type: none"> ○ Quarter 03/2024 – 25/09/2024 ○ Quarter 02/2024 – 24/06/2024 ○ Quarter 01/2024 – 26/03/2024 	
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		<ul style="list-style-type: none"> Quarter 04/2023 – 18/12/2023 	
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 Plantation Sdn Bhd has established comprehensive procedures for handling accidents and emergencies, documented in the Standard Operating Procedure titled "Emergency Preparedness & Response" (Ref No: TDMP-01/2018, dated 01/01/2018). An Emergency Response Plan (ERP) team has been formed to manage identified incidents, including fire, chemical spills, floods, and workplace accidents. To improve accessibility, these procedures have been simplified into flowcharts displayed for employee reference.</p> <p>The procedures have been communicated to workers, with records from the following estates indicating the dates of communication:</p> <ul style="list-style-type: none"> Pinang Emas Estate – 24/09/2024 Sungai Tong Palm Oil Mill – 24/07/2024 Jerangau Estate – 17/07/2024 Tayor Estate – 10/06/2024 Fikri Estate – 04/09/2024 <p>During site visits, it was observed that all workstations and operations are equipped with fire extinguishers and first aid kits. Employees demonstrated a solid understanding of first aid procedures, with training records from each estate as follows:</p> <ul style="list-style-type: none"> Pinang Emas Estate – 23/09/2024 	Complied

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		<ul style="list-style-type: none">• Sungai Tong Palm Oil Mill – 16/07/2024• Jerangau Estate – 09/07/2024• Tayor Estate – 26/08/2024• Fikri Estate – 14/07/2024 <p>An Emergency Response Team (ERT) has been formed at the mill, led by the Mill Manager. ERT charts, fire hydrant locations, and fire extinguisher maps are displayed on notice boards. Designated first aiders maintain first aid kits at various workstations, and workers are knowledgeable about emergency procedures, including accident response and first aid kit locations.</p> <p>Accident records are maintained monthly and submitted to headquarters. The JKKP 6, JKKP 7, and JKKP 8 forms are available for verification.</p> <p>Accident Records by Estate:</p> <ul style="list-style-type: none">• Pinang Emas Estate: Seven accidents occurred in 2023. JKKP 8 forms were submitted for each incident to DOSH on 15/01/2024 (Ref No: JKKP8/161844/2023). JKKP 6 was submitted for accidents involving five or more days of medical leave.• Sungai Tong Palm Mill: Two accidents occurred in 2024. JKKP 6 forms were submitted for each, and accident investigation reports were completed. JKKP 8 was submitted on 16/01/2024 (Ref No: JKKP8/164918/2023).	
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		<ul style="list-style-type: none"> Jerangau Estate: No accidents occurred in 2023. JKKP 8 was submitted on 22/01/2024 (Ref No: JKKP8/154220/2023). Taylor Estate: Four accidents occurred in 2023. JKKP 8 was submitted on 24/01/2024 (Ref No: JKKP8/170288/2023). 	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The management implements a structured approach to provide employees with appropriate Personal Protective Equipment (PPE) based on Hazard Identification, Risk Assessment, and Risk Control (HIRARC) principles. Records of PPE issuance, detailing employee names, types of PPE, dates of receipt, and acknowledgments, are maintained for verification. Site visits confirmed that workers consistently used the provided PPE, which was distributed free of charge. PPE training sessions were held on the following dates: Pinang Emas Estate (11/03/2024), Sungai Tong Palm Oil Mill (22/07/2024), Jerangau Estate (07/05/2024), and Fikri Estate (07/10/2024)</p> <p>During a site visit at Field 1998A, Pinang Emas Estate, it was found that one worker was harvesting tall palms without wearing safety goggles. This does not follow the PPE Matrix for Pinang Emas Estate, which requires harvesters to wear safety goggles during harvesting.</p> <p>During the site visit at Field 2020A2 for the spraying operation, workers were found to be spraying Ally. Referring to the CHRA recommendation for sprayers in the matured area, the recommended PPE is the 3M 3200 half-face respirator with a 3311K-55 cartridge. However, the workers were using N95 face masks. Thus, Non-Conformance was raised.</p>	Non-compliance

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6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>All sampled management units provide clinics staffed by certified Medical or Hospital Assistants to ensure employees receive necessary medical care. Site visits confirmed that the clinics are well-maintained, with records of medical inventory, VMO visits, and patient treatments available for verification.</p> <p>The estates and mill subscribe to SOCSO for accident insurance coverage for their workers, and the latest monthly contributions have been verified as follows:</p> <p>Pinang Emas Estate:</p> <ul style="list-style-type: none"> July 2024: ACR082240294572 – RM 10,527.50 June 2024: ACR072240266360 – RM 8,214.80 May 2024: ACR062240212846 – RM 8,090.20 <p>Sungai Tong Palm Oil Mill:</p> <ul style="list-style-type: none"> August 2024: ACR092240206348 – RM 5,803.10 July 2024: ACR082240220784 – RM 5,567.10 June 2024: ACR072240268097 – RM 5,691.60 <p>Jerangau Estate:</p> <ul style="list-style-type: none"> April 2024: ACR052240111152 – RM 6,653.10 May 2024: ACR062240110276 – RM 6,037.20 	Complied
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		<p>Taylor Estate:</p> <ul style="list-style-type: none"> January 2024: ACR022240308980 – RM 5,047.60 February 2024: ACR032240291422 – RM 4,880.80 March 2024: ACR042240255798 – RM 5,497.50 <p>Fikri Estate:</p> <ul style="list-style-type: none"> February 2024: ACR032240258446 – RM 7,790.70 March 2024: ACR042240216888 – RM 8,607.10 April 2024: ACR052240316359 – RM 9,183.00 	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	The Lost Time Injury Frequency Rate (LTIFR) metrics from RSPO were employed to track lost time injuries and total work hours for the year 2024. A thorough verification process was conducted, which included cross-referencing with records such as JKKP 8, ensuring the accuracy and reliability of the injury and work hour data for that timeframe.	Complied

Summary of stakeholders interviewed, documents sighted and workplace that were visited during the audit for Principle 6

Interviewee and/or sighted documents and records	Workplace
Social	
Mohd Axxx Ixxxxx- Contractor	Stakeholder consultation

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Mxxxxxxx Nxxx Mxxxxxxxxx- Gxxxx Mxxxxxx- Contractor	Stakeholder consultation
Mohd Rxxxxx bin Mxxx Nxxxx- JPKK Kxxxxxxxx Lxxxxxxxx	Stakeholder consultation
Mohd Sxxxxxx bin Sxxxxxxxxxxx- Hxxx Pxxxxxxx	Stakeholder consultation
Mohd Axxxxx bin Mxxx Rxxx- Fxxxxx Bxxxxx	Stakeholder consultation
Nxxxx Axxxx Sxxxxx- JTK Bxxxxxt/ Sxxxxx	Stakeholder consultation
Local workers Workers with shift A and shift B Newly recruited workers Worker's representative Gender committee Daily rate workers Piece rate workers. Group interview Total 16 workers	Sungai Tong POM
Local and foreign workers Newly recruited workers in 2024 Worker's representative Gender committee Daily rate workers Piece rate workers. Contractor workers Group interview. Total 22 workers	Fikri Estate

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Local and foreign workers Newly recruited workers in 2024 Worker's representative Gender committee Daily rate workers Piece rate workers. Contractor workers Group interview Total: 17 workers	Pinang Emas Estate
Local and foreign workers Newly recruited workers in 2024 Worker's representative Gender committee Daily rate workers Piece rate workers. Contractor workers Group interview. Total: 14 workers	Jerangau Estate
Local and foreign workers Newly recruited workers in 2024 Worker's representative Gender committee Daily rate workers Piece rate workers. Contractor workers	Tayor Estate

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Group interview. Total: 18 workers	
Social impact assessment (SIA) has been done on 12-15/06/2024 by Green Orbis Environment Sdn Bhd in the document GO/SIA/2203-01. Social impact assessment conduct in October 2022 by Green Sustainability Resources Sdn. Bhd by Ms Ermadasila bin Mohamad.	All Estates & Mill
Employment contract Pay slips for month April'24, June'24 and August'24 Attendance records/ Check roll SOCISO/ EPF contribution April'24, June'24 and August'24 Passport and Permit	All Estates & Mill
Retirement records and payment of Special Gratuitous Payment	All Estates & Mill
Company policy and procedure	All Estates & Mill
Line site inspection/ VMO visits	All Estates & Mill
Salary deduction records/ Electricity and Water Bill/ Membership of NUPW	All Estates & Mill
Newly recruited workers document (Application form/ interview records/ medical check-up/offer letter)	All Estates & Mill
Contract agreement with contractor/ Due diligence of contractors/ Employment contract for contractor workers, payslip for June and August 2024, EPF and SOCISO contribution.	All Estates & Mill
Policy Health and Safety Policy, dated 01/01/2022 Polisi Etika Kerja; approved by new CEO on 22/2/2023 Whistleblowing policy by TDM Plantation Sdn. Bhd	All Estates & Mill

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<p>"Polisi Sosial" dated 23/02/2023 signed by the chief executive officer, Mr Hamdan bin Ibrahim</p> <p>Human Rights Policy / Polisi Hak Hak Asasi Manusia and Social Policy/Polisi Sosial dated 23rd February 2023</p> <p>"Polisi Perlindungan Kanak- Kanak" dated 23/02/2023 signed by the chief executive officer, Mr Hamdan bin Ibrahim.'No child labour' policy</p> <p>Gender Policy, dated 23/02/2023 signed by the chief executive officer, Mr Hamdan bin Ibrahim.</p> <p>The Reproductive Rights Policy and Social Policy dated 23/02/2023 signed by the chief executive officer, Mr Hamdan bin Ibrahim.</p> <p>The Foreign Worker Policy, dated 23/02/2023 signed by the chief executive officer, Mr Hamdan bin Ibrahim</p>	
Safety	
<p>Local and foreign workers</p> <p>Daily rate workers</p> <p>Piece rate workers.</p> <p>Group interview.</p> <p>Total 6 workers</p>	Pinang Emas Estate
<p>Local and foreign workers</p> <p>Daily rate workers</p> <p>Piece rate workers.</p> <p>Group interview.</p> <p>Total 4 workers</p>	Jerangau Estate
<p>Local and foreign workers</p> <p>Daily rate workers</p> <p>Piece rate workers.</p>	Fikri Estate

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Group interview. Total 8 workers	
OSH Chairperson Appointment Letter	All Estates & Mill
OSH Committee – Minutes Of meeting	All Estates & Mill
Emergency Preparedness And Response Procedure	All Estates & Mill
JKKP 8 Records	All Estates & Mill
SOCISO Contribution Records	All Estates & Mill
PPE Issuance Records	All Estates & Mill

Principle 7: Protect, conserve and enhance ecosystems and the environment			
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	<p>The estates 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 <p>The estates conducted rat baiting campaign once every 6 months. Reviewed the latest records of rat baiting conducted in August 2024.</p>	Complied

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		<p>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
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>The justification for all pesticides used in the estate is documented in the Agricultural Reference SOP Section A11 & A12 Standard Book. This manual outlines the types of agrochemicals utilized, the target pests, weeds, and diseases, the weed situation, recommended chemical brand names, application rates, and methods of application. Verification of the chemical register, chemical issuance records, and site visits confirmed that the pesticides applied were consistent with the justifications provided in the manual.</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 pesticide use, including active ingredients, their LD50 values, areas treated, amounts of active ingredient applied per hectare, and the number of applications, have been maintained by the estates. The total active ingredient per hectare for 2022 and 2023 is available for review. Sample records from various estates are as follows:</p> <ol style="list-style-type: none"> Pinang Emas Estate: <ul style="list-style-type: none"> July 2024: 0.02 August 2024: 0.06 September 2024: 0.06 Jerangau Estate: <ul style="list-style-type: none"> March 2024: 0.29 April 2024: 0.08 May 2024: 0.67 Fikri Estate: <ul style="list-style-type: none"> April 2024: 0.167 May 2024: 0.072 June 2024: 0.082 Tayor Estate: <ul style="list-style-type: none"> January 2024: 0.117 February 2024: 0.146 	Complied

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		<ul style="list-style-type: none"> March 2024: 0.175 	
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 Agricultural Reference Standard Operating Procedures (SOP) in Sections A11 and A12 of the Standard Book provide detailed guidelines on the quantities and justifications for agrochemicals based on different field conditions. These guidelines cover the selection of agrochemicals, their targets (pests, weeds, or diseases), current weed situations, recommended chemical names, application rates, and methods.</p> <p>A verification process involving chemical registers, issuance records, and on-site visits confirmed that pesticide use complied with the manual's justifications. Beneficial plants were also strategically planted along estate roadsides to support leaf-eating predators.</p> <p>The consistent application of these practices demonstrates a strong commitment to the established SOP, with all sampled estates having discontinued the use of Class I herbicides. Additionally, a memo issued on 13/01/2021 highlighted the standardization of fungicide and pesticide treatments across TDM Plantation estates, recommending specific active ingredients for various pest issues. Nursery guidelines include alternating fungicides based on the severity of attacks and avoiding evening watering on application days, while specific pesticide use requires prior approval to ensure protocol compliance.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There was no evidence of prophylactic use of pesticide at all the sampled estates.</p>	Complied

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7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> 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. <p>- Minor compliance -</p>	<p>All sampled estates have strictly adhered to a policy of not using pesticides classified as World Health Organization Class 1A or 1B, as well as those listed under the Stockholm or Rotterdam Conventions. This commitment was confirmed through a comprehensive verification process that included visits to pesticide storage facilities, review of inventory records, examination of chemical registers submitted to relevant authorities, reference to CHRA reports, and interviews with employees. This thorough verification process underscores the estates' responsible and safe approach to pest management by ensuring that hazardous pesticides are not in use.</p>	Complied
7.2.6	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Training programs on the safe handling of chemicals and proper spraying techniques were conducted for relevant employees, including storekeepers, pre-mixers, and herbicide sprayers. This initiative aligns with recommendations from the CHRA assessor, highlighting the importance of safety and effective methods.</p> <p>To facilitate the effective transfer of knowledge, a variety of training methods were employed, including briefings, practical sessions, and on-the-job supervision. This comprehensive approach aimed to ensure that employees understood and could implement safe chemical handling and spraying practices. Detailed records of these training sessions were maintained for verification.</p>	Complied

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		<p>Sample training records include:</p> <ol style="list-style-type: none"> 1. Pinang Emas Estate – 23/06/2024 2. Jerangau Estate – Chemical Handling Training – 28/05/2024 3. Tayor Estate – Chemical Handling Training – 18/02/2024 4. Fikri Estate – Chemical Handling Training – 10/09/2024 	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were stored in all estates' chemical stores in compliance with the Occupational Safety and Health Act 1994 (Act 514) and the Pesticides Act 1974 (Act 149) along with their associated regulations. The stores were securely locked at all times to prevent unauthorized access. Hazard signage was prominently displayed on both the exterior and interior walls. Additionally, proper ventilation facilities and safety data sheets were adequately provided.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Unused chemical containers that were not utilized for premixing were managed responsibly. They underwent a thorough process of triple rinsing and puncturing before being classified as scheduled waste. The disposal of these containers was conducted through waste collection contractors, ensuring compliance with Indicator 7.3.2.</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Aerial spraying of pesticides is not practiced in the sampled estates.</p>	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>At Pinang Emas Estate, the CHRA report highlighted the need for annual medical surveillance for pesticide operators. However, management has been conducting monthly health checks for all</p>	Complied

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	- Critical (Major) compliance -	<p>pesticide operators. Records from a medical surveillance conducted on 26/05/2024 confirmed that all workers were declared fit.</p> <p>At Jerangau Estate, the CHRA recommended annual medical surveillance, which was carried out on 24/08/2024 for eight workers, all of whom were also declared fit.</p> <p>Fikri Estate adhered to CHRA recommendations by sending six workers for medical surveillance on 26/09/2024, with all being declared fit.</p> <p>At Tayor Estate, medical surveillance was conducted as per CHRA recommendations on 19/08/2024 for eight workers, who were declared fit. However, two workers will need to undergo re-assessment for liver function testing within two months, but no MRP recommendations were made by the OHD.</p>	
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>On-site observations, employee master list verification, and interviews at selected estates confirmed that no individuals under 18, pregnant or breastfeeding women, or individuals with medical restrictions were engaged in pesticide-related work. These protective measures prioritize employee safety and well-being. Furthermore, the management's Reproductive Policy, effective from 23/02/2023, safeguards female workers by prohibiting their involvement in chemical-related tasks from pregnancy confirmation until 24 months after delivery, ensuring their health during this critical period.</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 EFB</td></tr></table> <p>Mill</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 110 – Fluorescent tube/lamp SW 305 – spent lubricant SW 410 – rags, plastics, papers, contaminated filters SW 322 – Waste of non-halogenated organic 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 EFB	Type	Item Description	Scheduled Waste	SW 102 – Waste of lead acid batteries SW 110 – Fluorescent tube/lamp SW 305 – spent lubricant SW 410 – rags, plastics, papers, contaminated filters SW 322 – Waste of non-halogenated organic SW 409 – empty chemical containers	Domestic waste	Rubbish	Industrial waste	Scrap metal	Complied
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Industrial waste	Scrap metal																		

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		<table><tr><td></td><td>EFB POME Fiber Ash Boiler Shell</td></tr></table> <p>The operating units has established waste management plan and reviewed on annually basis. reviewed the implementation of the management plan as follows:</p> <table><tr><th>Issue</th><th>Action Plan</th></tr><tr><td>Management of SW – spent lubricating oil and hydraulic oil</td><td>Collect and record amount of relevant schedule waste</td></tr><tr><td>Management of rags, plastics, papers or filters contaminated with SW</td><td>Disposed of the item through licensed contractor as schedule waste</td></tr><tr><td>Management of waste from production formulation, trade or use of pesticides, herbicides or biocides</td><td>Spillage of water used for chemical mixing to be collected in a sump and recycled for future chemical mixing</td></tr><tr><td>Management of domestic waste</td><td>Collect recycle waste and send to recycle center.</td></tr><tr><td>Management of domestic waste</td><td>Disposed via majlis and internal landfill</td></tr></table>		EFB POME Fiber Ash Boiler Shell	Issue	Action Plan	Management of SW – spent lubricating oil and hydraulic oil	Collect and record amount of relevant schedule waste	Management of rags, plastics, papers or filters contaminated with SW	Disposed of the item through licensed contractor as schedule waste	Management of waste from production formulation, trade or use of pesticides, herbicides or biocides	Spillage of water used for chemical mixing to be collected in a sump and recycled for future chemical mixing	Management of domestic waste	Collect recycle waste and send to recycle center.	Management of domestic waste	Disposed via majlis and internal landfill	
	EFB POME Fiber Ash Boiler Shell																
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Management of domestic waste	Collect recycle waste and send to recycle center.																
Management of domestic waste	Disposed via majlis and internal landfill																
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	TDM Plantation has established SOP for handling scheduled waste and documented in Standard Operating procedure – Procedure for handling schedule waste dated 21/07/2024.	Non-compliance														

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		<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. Waste disposal was conducted base on SOP and waste management plan established. Reviewed the implementation of the management plan as follows:</p> <p>Awareness training on scheduled waste management has been conducted on the following dates:</p> <p>Pinang Emas Estate: 15/04/2024</p> <p>Sg Tong POM: 24/06/2024</p> <p>Jerangau Estate: 19/07/2024</p> <p>Tayor Estate: 14/07/2024</p> <p>Fikri Estate: 29/07/2024</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>Sg Tong POM</p> <p>Inventory</p> <ul style="list-style-type: none">File reference Number: JAS.THQ.600-3/1/11	
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		<ul style="list-style-type: none"> • Date Reporting: 30/09/2024 • Waste Generated: SW109, 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 • SW322 – Waste of non halogenated organic solvent: 0.0031 MT by Pentas Flora (Kelantan) Sdn Bhd <p>Pinang Emas Estate</p> <p>Inventory</p> <ul style="list-style-type: none"> • File reference Number: AS(B)T:11/139/000/052 • Date Reporting: 26/09/2024 • Waste Generated: SW305, SW404, SW408, SW409 and SW410. <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 2024100617HWOV9F • Date Disposal: 06/10/2024 • SW410 – Used Contaminated Rags: 0.0500 MT by Pentas Flora (Kelantan) Sdn Bhd <p>Jerangau Estate</p> <p>Inventory</p> <ul style="list-style-type: none"> • File reference Number: AS(B)T:11/123/000/033 	
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		<ul style="list-style-type: none">• Date Reporting: 30/09/2024• Waste Generated: SW305, SW306, SW409 and SW410. Disposal Sample 1 <ul style="list-style-type: none">• Disposal consignment note: 2024101408T4USZ2• Date Disposal: 14/10/2024• SW305 – Spent Lubricating Oil: 0.0100 MT by Pentas Flora (Kelantan) Sdn Bhd Taylor Estate Inventory <ul style="list-style-type: none">• File reference Number: AS(B)T:31/152/000/030• Date Reporting: 30/09/2024• Waste Generated: SW305, SW409 and SW410. Disposal Sample 1 <ul style="list-style-type: none">• Disposal consignment note: 2024071514W58Z2Q• Date Disposal: 15/07/2024• SW305 – Spent Lubricating Oil: 0.4000 MT by Pentas Flora (Kelantan) Sdn Bhd Fikri Estate Inventory <ul style="list-style-type: none">• File reference Number: AS(B)T:31/152/000/025	
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		<ul style="list-style-type: none"> • Date Reporting: 08/10/2024 • Waste Generated: SW305, SW404, SW409 and SW410. <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 2024100815PC4BV1 • Date Disposal: 08/10/2024 • SW305 – Used Engine Oil: 0.5320 MT by Pentas Flora (Kelantan) Sdn Bhd <p>The proper disposal of scheduled waste, in accordance with established procedures, was fully not demonstrated.</p> <p>Sg Tong POM</p> <p>During the site inspection at Sg Tong POM (Effluent Pond No. 8), a 200-liter empty drum (Brand Petronas) was found left unattended. Additionally, two 20-liter lubricant containers were being used for domestic purposes in the scrap iron area. This is not in compliance with SOP B9, Schedule Waste dated July 2024, Section 1.4.4, which states, "Safe and proper scheduled waste handling shall be practiced by all personnel who handle scheduled wastes to prevent injuries due to contact with scheduled waste or accidental spills, which may lead to environmental contamination." Thus, Minor Nc was raised.</p>	
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</p>	Complied

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		clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	
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 b) "Guidelines On River Management" c) Pictorial Safety Standards and Security Guidelines (PSS). d) Laboratory Process Control Manual e) Security Guidelines 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 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.</p>	Complied

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7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Periodic tissue and soil sampling 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>Pinang Emas Estate</p> <ul style="list-style-type: none"> • Latest leaf sampling conducted in 04-12/10/2023. Refer report no. LE/2023/10/324 dated 15/10/2023. Latest sampling conducted on 25/08/2024 and result were in progress. • Latest soil sampling conducted in 07-21/12/2023. Refer report no. SE/2023/12/161 dated 24/12/2023 <p>Jerangau Estate</p> <ul style="list-style-type: none"> • Latest leaf sampling conducted in 08-10/07/2024. Refer report no. LE/2024/07/273 dated 14/07/2024. • Latest soil sampling conducted in 27/12/2023. Refer report no. SE/2024/01/08 dated 12/01/2024. <p>Tayor Estate</p> <ul style="list-style-type: none"> • Latest leaf sampling conducted in 23/07/2024. Refer report no. LE/2024/07/312 dated 29/07/2024. • Latest soil sampling conducted in 27/12/2023. Refer report no. SE/2024/01/10 dated 12/01/2024. <p>Fikri Estate</p> <ul style="list-style-type: none"> • Latest leaf sampling conducted in 16/07/2023. . Refer report no. LE/2023/07/217 dated 31/07/2023. 	Complied
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		<ul style="list-style-type: none"> Latest soil sampling conducted in 27/12/2023. Refer report no. SE/2024/01/09 dated 12/01/2024. 																	
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"> EFB application in designated fields at dosage of 40 mt/ha applied in inter rows subject to Agronomist recommendations. Cut frond are stacked in between the palm's rows left to discompose. <p>The estate has established EFB and Bio-Compost application program FY 2024. Reviewed the application records as to date September 2024 as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th><th>Sept 2024</th><th>Aug 2024</th><th>July 2024</th></tr> </thead> <tbody> <tr> <td>Pinang Emas</td><td>171.80 MT</td><td>151.22 MT</td><td>195.39 MT</td></tr> <tr> <td>Jerangau Estate</td><td>0.00</td><td>0.00</td><td>0.00</td></tr> <tr> <td>Fikri Estate</td><td>52.40</td><td>351.38</td><td>531.12</td></tr> </tbody> </table>	Estate	Sept 2024	Aug 2024	July 2024	Pinang Emas	171.80 MT	151.22 MT	195.39 MT	Jerangau Estate	0.00	0.00	0.00	Fikri Estate	52.40	351.38	531.12	Complied
Estate	Sept 2024	Aug 2024	July 2024																
Pinang Emas	171.80 MT	151.22 MT	195.39 MT																
Jerangau Estate	0.00	0.00	0.00																
Fikri Estate	52.40	351.38	531.12																
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>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</p>	Complied																

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		monthly basis through Monthly Report. Reviewed the Monthly Report for the month of September 2024.	
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
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.	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	Complied

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- Critical (Major) compliance -	considered factors such as land terrain, drainage, and road systems. The table below illustrates the identified soil series for each estate:																														
	Pinang Emas Estate																														
	<table><tr><th>Soil series</th><th>Percentage, %</th></tr><tr><td>Bungor</td><td>3.19</td></tr><tr><td>Binjai</td><td>1.47</td></tr><tr><td>Batu lapan</td><td>18.59</td></tr><tr><td>Bukit Tuku</td><td>2.11</td></tr><tr><td>Chempaka</td><td>9.20</td></tr><tr><td>Durian</td><td>0.22</td></tr><tr><td>Gong Chenak</td><td>5.79</td></tr><tr><td>Gondang</td><td>0.06</td></tr><tr><td>Lubuk Itik</td><td>3.21</td></tr><tr><td>Marang</td><td>0.03</td></tr><tr><td>Penambang</td><td>0.53</td></tr><tr><td>Padang Besar</td><td>1.83</td></tr><tr><td>Rengam</td><td>1.52</td></tr><tr><td>Tebok</td><td>6.79</td></tr></table>	Soil series	Percentage, %	Bungor	3.19	Binjai	1.47	Batu lapan	18.59	Bukit Tuku	2.11	Chempaka	9.20	Durian	0.22	Gong Chenak	5.79	Gondang	0.06	Lubuk Itik	3.21	Marang	0.03	Penambang	0.53	Padang Besar	1.83	Rengam	1.52	Tebok	6.79
	Soil series	Percentage, %																													
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		Telemong	1.91	
		Tok Yong	0.08	
		Jerangau Estate		
		Soil series	Percentage, %	
		Bungor	4.93	
		Kesatuan Binjai – Lubok Itik	0.89	
		Batu Lapan	8.84	
		Bukit Tuku	3.51	
		Gali	1.80	
		Goh	3.84	
		Jerangau	29.20	
		Kechor	3.26	
		Rengam	22.42	
		Sg Buluh	1.92	
		Awang	0.77	
		Batang Merbau	15.55	
		Bukit Tuku Awang	1.09	
		Gondang	1.98	

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		Tayor Estate		
		Soil series	Percentage, %	
		Alma	0.04	
		Awang	1.25	
		Kesatuan Bungor – Batu Lapan	36.33	
		Kesatuan Binjai Lubuk Itik	7.91	
		Kesatuan Batu Lapan – Padang Besar	0.26	
		Batu Lapan	19.34	
		Batang Merbau	1.67	
		Bukit Tuku	3.53	
		Kesatuan Cerang Hangus – Kg Pusu	1.94	
		Jabil	0.42	
		Kg Pusu	0.72	
		Kerayong	1.75	
		Lundang Cempaka	2.28	
		Penampang	0.10	
		Pak Bong	1.14	
		Rengam	21.32	

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		Tayor Estate		
		Soil series	Percentage, %	
		Awang	2.94	
		Binjai	1.04	
		Bukit Tuku	0.36	
		Gong Chenak	0.45	
		Gondang	0.45	
		kerayong	1.67	
		Lundang	2.13	
		Kesatuan Lundang Chempaka	0.63	
		Kesatuan Lundang Medang	0.86	
		Lubuk Itik	2.94	
		Penambang	5.07	
		Kesatuan Baling Bukit Temiang	0.41	
		Kesatuan Marang Kuala Brang	0.36	
		Kesatuan Padang Besar Batu Lapan	0.02	
		Tanah Curam	1.54	
		Tai Tak	2.94	

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		<table><tr><td>Rengam</td><td>52.73</td></tr><tr><td>Kesataun Bungor Kuala Brang</td><td>6.58</td></tr><tr><td>Bungor</td><td>4.84</td></tr><tr><td>Kesatuan Rengam Beserah</td><td>12.00</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>	Rengam	52.73	Kesataun Bungor Kuala Brang	6.58	Bungor	4.84	Kesatuan Rengam Beserah	12.00													
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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>Pinang Emas</th><th>Jerangau Estate</th></tr><tr><td>0°-2° Flat</td><td>46.00</td><td>17.14</td></tr><tr><td>2°-6° Undulating</td><td>8.42</td><td>14.92</td></tr><tr><td>6°-12° Rolling</td><td>33.90</td><td>67.94</td></tr><tr><td>12°-20° Gentle Slope</td><td>10.52</td><td>0.00</td></tr><tr><td>20°-25° Hilly</td><td>1.16</td><td>0.00</td></tr></table>	Degree	Percentage, %		Pinang Emas	Jerangau Estate	0°-2° Flat	46.00	17.14	2°-6° Undulating	8.42	14.92	6°-12° Rolling	33.90	67.94	12°-20° Gentle Slope	10.52	0.00	20°-25° Hilly	1.16	0.00	Complied
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		<table><tr><td>>25° Steep</td><td>0.00</td><td>0.00</td></tr></table> <table><tr><th rowspan="2">Degree</th><th colspan="2">Percentage, %</th></tr><tr><th>Tayor Estate</th><th>Fikri Estate</th></tr><tr><td>0°-2° Flat</td><td>18.54</td><td>21.00</td></tr><tr><td>2°-6° Undulating</td><td>37.17</td><td>56.00</td></tr><tr><td>6°-12° Rolling</td><td>11.13</td><td>17.00</td></tr><tr><td>12°-20° Gentle Slope</td><td>31.58</td><td>6.00</td></tr><tr><td>20°-25° Hilly</td><td>0.14</td><td>0.00</td></tr><tr><td>>25° Steep</td><td>1.54</td><td>0.00</td></tr></table>	>25° Steep	0.00	0.00	Degree	Percentage, %		Tayor Estate	Fikri Estate	0°-2° Flat	18.54	21.00	2°-6° Undulating	37.17	56.00	6°-12° Rolling	11.13	17.00	12°-20° Gentle Slope	31.58	6.00	20°-25° Hilly	0.14	0.00	>25° Steep	1.54	0.00	
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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 Sg Tong 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 Sg Tong 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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	<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>		
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 Sg Tong 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 Sg Tong 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 Sg Tong 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 Sg Tong 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 Sg Tong 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	Non-compliance
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>Pinang Emas Estate</u></p> <ul style="list-style-type: none"> • Date of report: 31/03/2024 • Report No: ERAKT/TDM/PINANGEMAS/24/03-01 • Date Tested: 20/03/2024 • 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>Sg Tong POM</u></p> <p><u>Final Discharge</u></p> <ul style="list-style-type: none"> • Date of report: 02/10/2024 • Report No: 24/09/W0651 • Date Tested: 14/09/2024 <p><u>Inlet & Outlet</u></p> <ul style="list-style-type: none"> • Date of report: 13/10/2024 • Report No: 24/10/W0686 • Date Tested: 01/10/2024 <p><u>Tayor Estate</u></p> <ul style="list-style-type: none"> • Date of report: 16/07/2024 • Report No: ERAKT/TDM/TAYOR/24/07-04 • Date Tested: 02/07/2024 • 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>Fikri Estate</u></p> <ul style="list-style-type: none">• Date of report: 03/07/2024• Report No: ERAKT/TDM/FIKRI/24/07-03• Date Tested: 23/06/2024• 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>Chemical activities have been observed in the Buffer Zone and High Conservation Value (HCV) area.</p> <p><u>Pinang Emas Estate</u></p> <p>During the site visit at Pinang Emas Estate, chemical effects were observed in the buffer zone (Sungai Air Jernih) at Block P98A2 (within the marked buffer zone). An interview with the person in charge confirmed that the effects were due to spraying activities conducted in the area. Additionally, it was verified that spraying had been done for maintenance at the Old Graves (HCV – Kubur 3 Beranak) within the marked HCV area. These actions violated the management plan, which clearly states that "No spraying is allowed in CSA areas, Riparian Reserved areas, drain edges, and along the roads in HCV areas" and RSPO Manual on Best Management Practices (BMPs) for the Management and Rehabilitation of Riparian Reserves Section 1.2.1 Water Quality Protection and 1.2.4 Conservation Of Biodiversity Within Oil Palm Plantation Landscapes.</p> <p><u>Fikri Estate</u></p>	
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		During the site visit at Fikri Estate (Sentosa Division), chemical effects were observed in the buffer zone (Sungai Lekor) at Block P989B1 (within the marked buffer zone). These actions violated the management plan, which clearly states that "No spraying is allowed in CSA areas, Riparian Reserved areas, drain edges, and along the roads in HCV areas" and RSPO Manual on Best Management Practices (BMPs) for the Management and Rehabilitation of Riparian Reserves Section 1.2.1 Water Quality Protection. Thus, Major NC was raised.									
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	<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 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 1st, 2nd, 3rd 4th Quarter quarters of year 2023 & 2024.</p> <table><tr><th>Report Date</th><th>Quarter/Week</th><th>BOD (Limit=100mg/L)</th></tr><tr><td rowspan="2">07/10/2024</td><td>1stweek/1stmonth</td><td>20.00</td></tr><tr><td>5thweek/2ndMonth</td><td>10.00</td></tr></table>	Report Date	Quarter/Week	BOD (Limit=100mg/L)	07/10/2024	1 st week/1 st month	20.00	5 th week/2 nd Month	10.00	Complied
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		<table><tr><td></td><td>9thweek/3rdMonth</td><td>10.00</td></tr><tr><td rowspan="3">04/07/2024</td><td>1stweek/1stmonth</td><td>10.00</td></tr><tr><td>5thweek/2ndMonth</td><td>40.00</td></tr><tr><td>9thweek/3rdMonth</td><td>12.00</td></tr><tr><td rowspan="3">04/04/2024</td><td>1stweek/1stmonth</td><td>12.00</td></tr><tr><td>5thweek/2ndMonth</td><td>30.00</td></tr><tr><td>9thweek/3rdMonth</td><td>18.00</td></tr><tr><td rowspan="3">02/01/2024</td><td>1stweek/1stmonth</td><td>10.00</td></tr><tr><td>5thweek/2ndMonth</td><td>4.00</td></tr><tr><td>9thweek/3rdMonth</td><td>20.00</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 September 2024.</p>		9 th week/3 rd Month	10.00	04/07/2024	1 st week/1 st month	10.00	5 th week/2 nd Month	40.00	9 th week/3 rd Month	12.00	04/04/2024	1 st week/1 st month	12.00	5 th week/2 nd Month	30.00	9 th week/3 rd Month	18.00	02/01/2024	1 st week/1 st month	10.00	5 th week/2 nd Month	4.00	9 th week/3 rd Month	20.00	
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	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 Sg Tong POM. Average data as below:	Complied																								

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		<table><tr><td>Year</td><td>FFB Processed, MT</td><td>Water/L</td><td>Water/FFB</td></tr><tr><td>2023</td><td>124,514.62</td><td>333,910.00</td><td>2.68</td></tr></table>	Year	FFB Processed, MT	Water/L	Water/FFB	2023	124,514.62	333,910.00	2.68										
Year	FFB Processed, MT	Water/L	Water/FFB																	
2023	124,514.62	333,910.00	2.68																	
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																				
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<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 <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><td>Estate / Mill</td><td>Diesel, (MT)</td><td>FFB, (MT)</td><td>Diesel / FFB (MT)</td></tr><tr><td>Sg Tong POM</td><td>42,351.00</td><td>124,514.62</td><td>0.34</td></tr><tr><td>Pinang Emas Estate</td><td>47,842.00</td><td>17,752.10</td><td>2.87</td></tr><tr><td>Jerangau Estate</td><td>55,570.31</td><td>15,430.94</td><td>3.60</td></tr></table>		Estate / Mill	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)	Sg Tong POM	42,351.00	124,514.62	0.34	Pinang Emas Estate	47,842.00	17,752.10	2.87	Jerangau Estate	55,570.31	15,430.94	3.60	Complied
Estate / Mill	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)																	
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		Tayor Estate	72,170.30	17,154.91	4.21	
		Fikri Estate	88,969.36	23,791.64	3.74	
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 • 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 				Complied
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>	Not applicable since no new development by the certification unit.				Not Applicable

	- Critical (Major) compliance -														
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><tr><td>Expand uses of biodegradable material in estate activity</td><td>Biodegradable material of estate operation area being introduced to reduce the environmental impact from synthetic material uses.</td></tr><tr><td>Disposal of used chemical waste in schedule</td><td>Any empty chemical container is labelled with poisonous hazard sign and stored as schedule waste</td></tr><tr><td>Leakage of used engine oil and lubricant from workshop area</td><td>To construct oil containment sump at workshop area to contain any leakage</td></tr><tr><td>Leakage of chemicals at store area</td><td>To upgrade existing store to install oil containment sump</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	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	Complied
Objective	Action Plan														
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Leakage of chemicals at store area	To upgrade existing store to install oil containment sump														

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			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	
		<p>Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p> <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-TC2405CSNP-0102 Report date: 17/05/2024 Result: Dust: 82.10 mg/m³ (B5) vs limit 150, CO: 108.0 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>		

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		Environmental audit by 3 rd party has been conducted annually by AL Enviro Network Sdn Bhd dated 13/02/2024. Latest DOE visit was sighted on 05/09/2024. Refer DOE Visiting Book.	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	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 left to decompose naturally. Additionally, no fire was used for waste disposal.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	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: <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 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: <ul style="list-style-type: none"> Emergency Response Plan in the Event of Fire Emergency Response Plan in the Event of an Explosion 	Complied

		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.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	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 Sg Tong POM.	Complied
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	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	(C) HCVs, HCS forests and other conservation areas are identified as follows: 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. 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	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: Sg Tong, Bukit Besi, and Kemaman. 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.	Complied

	<p>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>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> <table border="1"> <thead> <tr> <th>Biodiversity Area</th><th>HCV Status</th><th>Remarks</th><th>Assessor Advice</th></tr> </thead> <tbody> <tr> <td colspan="4"><u>Pinang Emas Estate</u></td></tr> <tr> <td>River Buffer Zone</td><td>HCV 4</td><td>Erosion Control</td><td>The area needs to be protected due to its important towards the hydrology and to minimize the impact on the soil erosion.</td></tr> <tr> <td>Masjid Ladang Pinang Emas</td><td>HCV 6</td><td>Worship house</td><td>The area needs to be protected due to religious aspect.</td></tr> <tr> <td>Water Bodies</td><td>HCV 4</td><td>Water Body</td><td>The area is not a water catchment area. However, the area has become the water pool due its lowest point of elevation in this area. It is important to reserve this area as mitigation measures during flood event.</td></tr> </tbody> </table>	Biodiversity Area	HCV Status	Remarks	Assessor Advice	<u>Pinang Emas 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 the impact on the soil erosion.	Masjid Ladang Pinang Emas	HCV 6	Worship house	The area needs to be protected due to religious aspect.	Water Bodies	HCV 4	Water Body	The area is not a water catchment area. However, the area has become the water pool due its lowest point of elevation in this area. It is important to reserve this area as mitigation measures during flood event.	
Biodiversity Area	HCV Status	Remarks	Assessor Advice																				
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		Old Grave yard	HCV 6	Area of religious significant	The area needs to be protected due to religious aspect.
		<u>Jerangau Estate</u>			
		Surau Ladang Jerangau	HCV 6	Worship house	The area needs to be protected due to religious aspect.
		<u>Fikri Estate</u>			
		River Buffer Zone Sg Kulai	HCV 4	Erosion Control	The area needs to be protected due to its important towards the hydrology and to minimize impact on the soil erosion.
		Water Bodies	HCV 4	Water Body	The area needs to be protected due to its important towards the hydrology and tidal effect.
		Masjid Ladang Fikri	HCV 6	Worship house	The area needs to be protected due to religious aspect.
		<u>Tayor Estate</u>			

		Border to Forest Reserve	HCV 4	Conservation Area	The area needs to be protected due to the sloping area and its biodiversity.
		HCV Area	HCV 4	Unplanted Area	The Area needs to be protected due to its ecosystem of river. Thus, the buffer zone of this area needs to be protected. It is important towards the hydrology and to minimize the impact on the soil erosion.
		River Buffer Zone Sg Tayor	HCV 4	Erosion Control	The area needs to be protected due to its important towards the hydrology and to minimize impact on the soil erosion.
		Masjid Tayor Estate	HCV 6	Worship house	The area needs to be protected due to religious aspect.
		Graveyard (Muslim)	HCV 6	Area of religious significant	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			

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		maps for all TDM estates. These maps were utilized as references by the audit team during the physical audit. Additionally, TDM reaffirmed that there was no loss or clearance of HCVs within the 2022-2024 period. The change in hectareage 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>	<table><tr><td colspan="2">HCV management Plan has been done FY2024. Among the plan tabulated in the table below:</td></tr><tr><td>Objective</td><td>Action Plan</td></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</td><td>Estate community shall be exposed to the knowledge of</td></tr></table>	HCV management Plan has been done FY2024. Among the plan tabulated in the table below:		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	Estate community shall be exposed to the knowledge of	Complied
HCV management Plan has been done FY2024. Among the plan tabulated in the table below:													
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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	Estate community shall be exposed to the knowledge of												

		conservation and management among estate community	nature conservation which 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: Pinang Emas Estate: 07/05/2024 Jerangau Estate: 09/01/2024 Tayor Estate: 11/09/2024 Fikri Estate: 03/07/2024</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 Sg Tong 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 **TDM Sg Tong POM** and supply base was calculated using the PalmGHG Calculator version 4. 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 data 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 **TDM Sg Tong POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	0.61	OER	19.41
PK	0.61	KER	4.72

Production	t/yr	Land Use	Ha
FFB Process	124,514.62	Oil palm planted on mineral soil	26,993.41
CPO Produced	24,612.22	Oil palm planted on peat	0.00
PK Produced	5,881.04	Total oil palm planted area	26,993.41
		Conservation area (forested)	198.10
		Conservation area (non-forested)	0.17
		Total	27,191.68

Summary of Field Emission and Sink

	Own Crop*			Group			3 rd Party			Total
Description	tCO ₂ e	tCO ₂ e / ha	tCO ₂ e / t FFB	tCO ₂ e	tCO ₂ e / ha	tCO ₂ e / t FFB	tCO ₂ e	tCO ₂ e / ha	tCO ₂ e / t FFB	
Emission source										
Land Conversion	60,771.40	4.87	0.69	2659.17	0.18	0.73	0.00	0.00	0.00	63370.57
CO ₂ Emission from fertilizer	1660.71	0.13	0.02	22.92	0.00	0.01	0.00	0.00	0.00	1683.69
NO ₂ Emission from peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO ₂ Emission from fertilizer	1.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.56
Fuel Consumption	790.94	0.06	0.01	40.85	0.00	0.01	0.00	0.00	0.00	831.79
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sinks										
Crop Sequestration	-50,845.96	-4.08	-0.58	-2501.19	-0.17	-0.69	0.00	0.00	0.00	-53,347.15

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Sequestration in Conservation area	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	12,318.72	0.99	0.14	221.75	0.02	0.06	0.00	0.00	0.00	17128.86

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission sources		
POME	1,050.19	0.00
Fuel Consumption	132.14	0.00
Grid Electricity Utilization	0.00	0.00
Credits		
Export of excess electricity to housing & grid	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	1,182.33	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

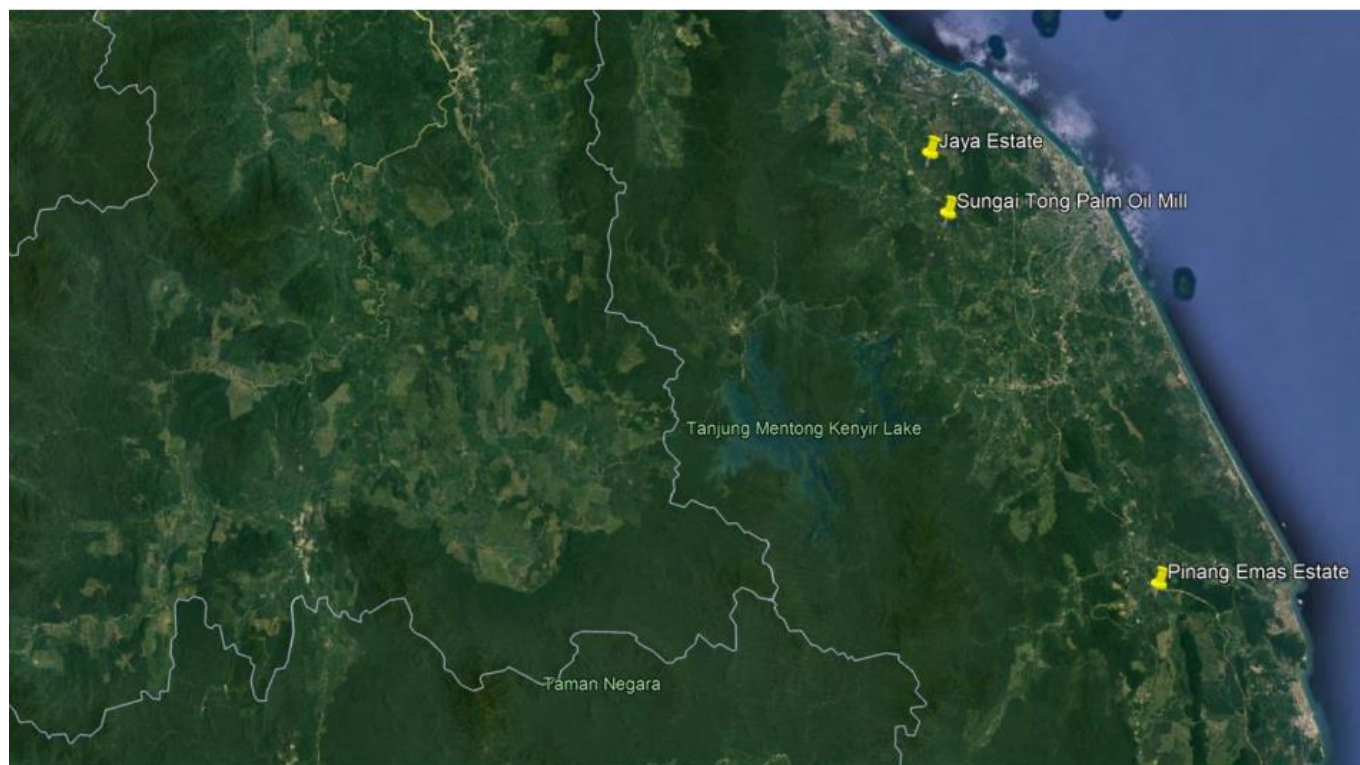
*This mill has no kernel crusher operation.

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

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

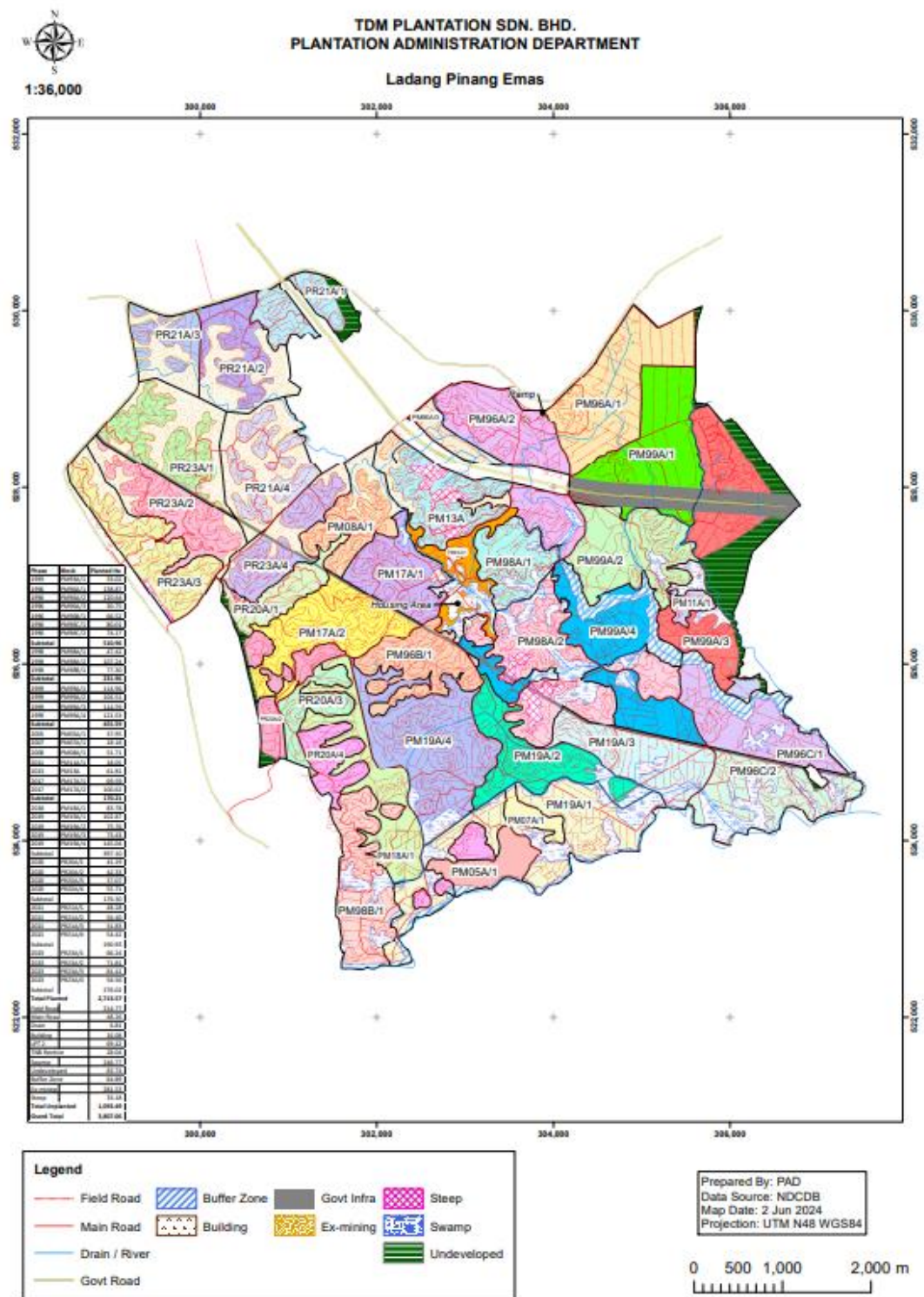
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Appendix C: Location Map of Certification Unit and Supply bases



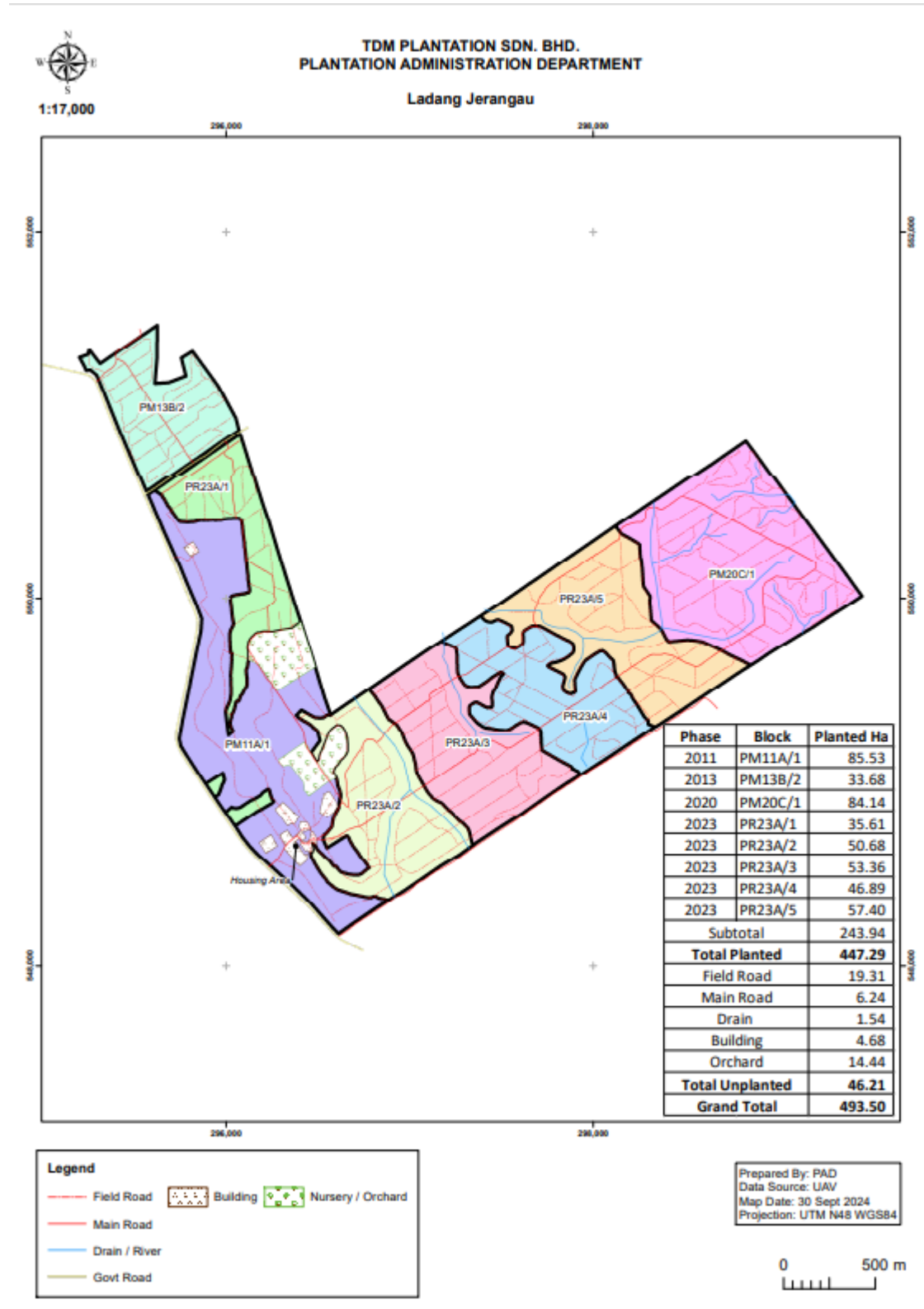
Appendix D: Estate Field Map

Pinang Emas Estate



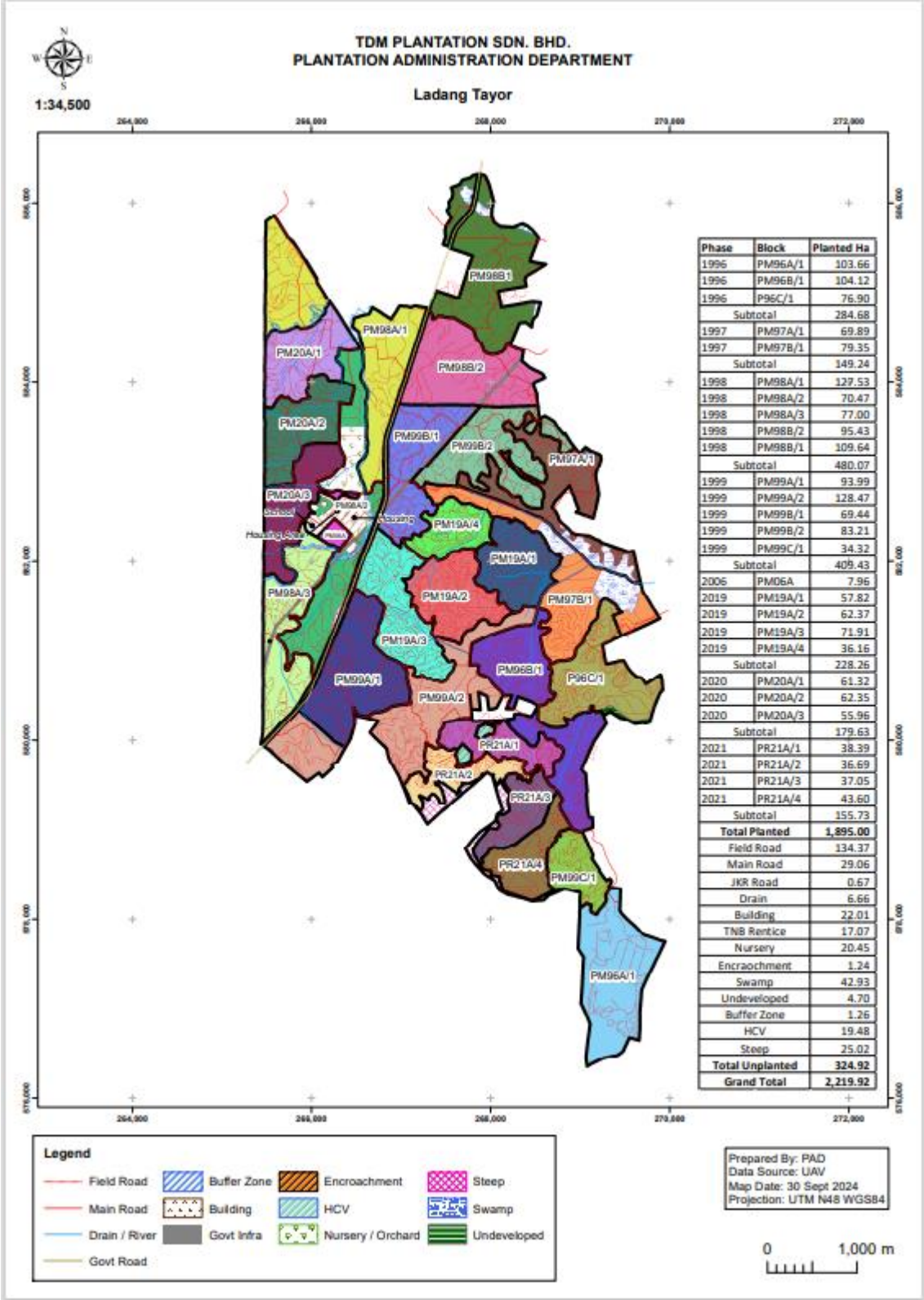
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Jerangau Estate

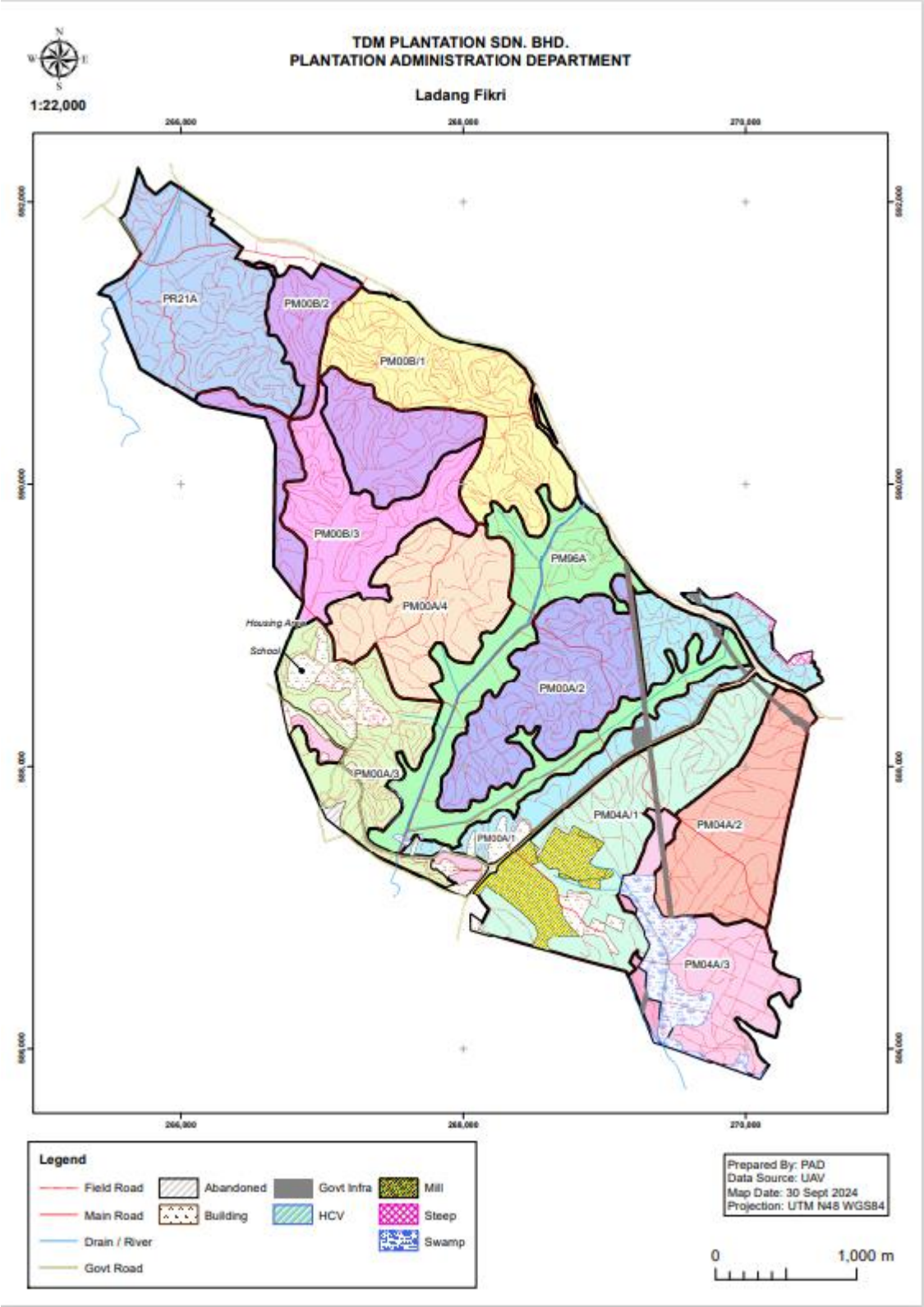


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Tayor Estate



Fikri Estate



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Appendix E: List of Smallholder Registered and/or sampled

*(Applicable for ISS - independent smallholder / scheme smallholder / outgrowers for group certification).
If smallholders are part of the RSPO P&C certification, only include details of those that were 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			

*(Notes for auditor: table below can be replaced by using smallholder register but note to indicate which smallholder/members sampled in this audit using * shall be indicated as example in table below).*

[illegible]

Note: * are smallholders sampled in this audit.

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