

**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): Sime Darby Plantation Berhad
Client company Address: Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7, Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 1) Sungai Dingin Palm Oil Mill and Supply Base
Location of Certification Unit: Jalan Mahang-Kelang Lama, 09700 Karangan, Kedah, Malaysia
Date of Final Report: 24/5/2021

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Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	Sime Darby Plantation Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7, Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 1) – Sungai Dingin Palm Oil Mill		
Location / Address	Jalan Mahang-Kelang Lama, 09700 Karangan, Kedah, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Subramaniam a/l Govindasamy (Mill Manager)	E-mail	shylaja.vasudevan@simedarbyplantation.com kks.sungai.dingin@simedarbyplantation.com
Telephone	+603-78484379 (Head Office) +603 5940178 (Mill)	Facsimile	+603 78484363 (Head Office) +603 5940167 (Mill)

2. Certification Information			
Certificate Number	RSPO 550179	Date of First Certification	12/08/2010
		Certificate Start Date	12/08/2020
		Certificate Expiry Date	11/08/2025
Scope of Certification	Palm Oil & Palm Kernel Production		
Visit Objectives	The objective of the assessment is to conduct a annual surveillance assessment to ensure the elements of the scope of registration and the requirements of the management standard are effectively addressed by SOU 1 Sungai Dingin POM and Supply Base's management system and the ability of the management system to ensure the organisation meets applicable statutory, regulatory and contractual requirements and as applicable, to identify areas for potential improvement of the management system.		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 2 ; ASA 1) <input type="checkbox"/> Scope Extension		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016		

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	<input type="checkbox"/> RSPO Independent Smallholders Standard 2019
Supply Chain Module	<input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 705584	MSPO 2530-4:2013 (MSPO Part 4 :General Principles For Palm Oil Mill)	BSI Services Malaysia Sdn Bhd	14/02/2023
MSPO 705628	MSPO 2530-3:2013 (MSPO Part 3 :General Principles For Oil Palm Plantations And Organized Smallholders)		14/02/2023
MSPO 717859	MSPO Supply Chain Certification Standard: 2018		20/10/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Sungai Dingin Palm Oil Mill	Jalan Mahang-Kelang Lama 09700 Karangan, Kedah, Malaysia	5° 23' 38.60" N	100° 42' 36.30" E
Sungai Dingin Estate	Jalan Mahang-Kelang Lama 09700 Karangan, Kedah, Malaysia	5° 21' 05.22" N	100° 42' 09.32" E
Padang Buluh Estate	Jalan Sidam Kiri, Sungai Petani, Kedah, Malaysia	5° 34' 25.00" N	100° 34' 24.00" E
Bukit Selarong Estate	Jalan Ladang Bukit Selarong, Padang Serai, Kedah, Malaysia	5° 28' 21.25" N	100° 35' 30.55" E
Anak Kulim Estate	Jalan Kulim – Serdang, Kulim, Kedah, Malaysia	5° 18' 41.33" N	100° 36' 12.64" E
Bukit Hijau Estate	Jalan Kuala Tawar – Sedim, Kuala Ketil, Kedah, Malaysia	5° 33' 04.00" N	100° 45' 25.00" E
Jentayu Estate	K 17, Sungai Petani Kedah, Malaysia	5° 45' 59.83" N	100° 39' 49.21" E
Somme Estate	Jalan Terap – Serdang, Serdang, Kedah, Malaysia	5° 15' 12.00" N	100° 36' 14.00" E

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5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Selarong Estate	3,639.64	34.24	222.29	3,896.17	93.42
Sungai Dingin Estate	2,928.17	3.56	1,312.30	4,244.03	69.00
Padang Buluh Estate	3,447.00	14.34	547.13	4,008.47	85.99
Anak Kulim Estate	389.19	1.72	1,132.44	1,523.35	25.55
Bukit Hijau Estate	1,442.10	5.33	1,277.57	2,725.00	52.93
Jentayu Estate	1,191.04	0.71	986.84	2,178.59	54.67
Somme Estate	808.39	0	133.17	941.56	85.86
Total	13,845.53	59.9	5,611.74	19,517.17	66.78

Remarks:

- Bukit Hijau Estate: Total planted reduced 8.52 ha based on survey conducted by Precision Agriculture Unit (PAU) on July 2019. Increase of 8.52 ha at Infrastructure & others based on survey conducted by PAU.
- Somme Estate: Total Planted increase 37.67Ha based on survey conducted by GPS Team on May 2020, after previously declared 25 degree area no longer in category & converted to planted area.
- Bukit Selarong Estate: Total planted reduced 29.4 ha due land acquisition (Field : 1998B & 1999A) by Globalview Properties Sdn. Bhd. on Feb 2020.
- Anak Kulim Estate: Total planted increase 0.86 ha based on survey conducted by GPS Team on Feb 2020.

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Selarong Estate	765.62	612.81	555.76	1,695.45	10.00	2,874.02	765.62
Sungai Dingin Estate	435.74	599.90	771.59	1,079.86	41.08	2,492.43	435.74
Padang Buluh Estate	545.00	882.00	1,671.00	349.00	0.00	2,902.00	545.00
Anak Kulim Estate	181.68	0.00	207.51	0.00	0.00	207.51	181.68
Bukit Hijau Estate	254.72	166.66	716.97	303.75	0.00	1,187.38	254.72
Jentayu Estate	138.02	0.00	683.62	369.40	0.00	1,053.02	138.02
Somme Estate	222.76	184.38	316.62	84.63	0.00	585.63	222.76
Total (ha)	2,543.54	2,445.75	4,923.07	3,882.09	51.08	11,301.99	2,543.54

7. Certified Tonnage of FFB (Own Certified Scope)	
Estate	Tonnage / year

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	Estimated (<i>Aug 20 – Jul 21</i>)	Actual (<i>Jul 20 – Mar 21</i>)		Forecast (<i>Aug 21 – Jul 22</i>)
		<i>Previous license period</i> (Jul 20)	<i>Current license period</i> (Aug 20 – Mar 21)	
Bukit Selarong Estate	69,066.00	4,486.76	23,877.17	57,976.18
Sungai Dingin Estate	54,057.00	4,486.73	27,332.73	43,939.71
Padang Buluh Estate	67,000.00	4,338.94	27,985.30	83,025.00
Anak Kulim Estate	3,300.00	286.30	2,080.03	3,022.36
Bukit Hijau Estate	24,500.00	1,346.57	8,710.74	18,933.57
Jentayu Estate	24,507.00	1,214.92	8,673.97	18,415.00
Somme Estate	13,500.00	1,140.14	7,311.45	12,991.44
Total	255,930.00	123,271.75		238,303.26

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

Estate	Tonnage / year			Forecast (<i>Aug 21 – Jul 22</i>)
	Estimated (<i>Aug 20 – Jul 21</i>)	Actual (<i>Jul 20 – Mar 21</i>)		
		<i>Previous license period</i> (Jul 20)	<i>Current license period</i> (Aug 20 – Mar 21)	
Bukit Sembilan Estate (Genting)	N/A	146.90	1,357.55	N/A
Holyrood Estate		2,633.53	10,150.96	
Tali Ayer Estate		-	349.99	
Chersonase Estate		-	316.85	
Kalumpang Estate		-	267.63	
Total		15,223.41		

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

Independent FFB Supplier	Tonnage / year			Forecast (<i>Aug 21 – Jul 22</i>)
	Estimated (<i>Aug 20 – Jul 21</i>)	Actual (<i>Jul 20 – Mar 21</i>)		
		<i>Previous license period</i> (Jul 20)	<i>Current license period</i> (Aug 20 – Mar 21)	
Tang Tatt	N/A	1,790.43	12,719.11	N/A
CK Teik		799.45	6,632.16	
Felcra Berhad		79.83	1,099.26	

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Felcra Malau		528.738	3,330.06	
Kpsm		-	66.22	
Boleh Jadi		91.56	26.05	
Tentu Mewah		186.36	46.57	
Total		27,395.80		

10. Certified Tonnage				
Mill Capacity: 80 MT/hr	Estimated (Aug 20 – Jul 21)	Actual (Jul 20 – Mar 21)		Forecast (Aug 21 – Jul 22)
	FFB	FFB		FFB
	255,930.00	<i>Previous license period (Jul 20)</i>	<i>Current license period (Aug 20 – Mar 21)</i>	238,303.26
		20,080.79	118,414.37	
		138,495.16		
	CPO (OER: 21.78 %)	CPO (OER: 21.17 %)		CPO (OER: 21.65 %)
	55,741.55	4,450.10	24,870.65	51,592.66
		29,320.75		
	PK (KER 5.80 %)	PK (KER: 5.60 %)		PK (KER: 5.66 %)
14,843.94	1,181.23	6,579.10	13,487.96	
	7,760.33			
Remark:				
1. The actual total CPO & PK production is about 50% of estimated volume due to shortage of harvesters in SOU 1 Sg. Dingin. The shortage of total 20 harvesters from August 2020 increase to shortage of 84 harvesters on March 2021. The harvesters have back to their home countries and could not come back to Malaysia due to Covid-19 pandemic.				

11. Actual Sold Volume (CPO)					
Current License period (Aug 20 – Mar 21)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	1,017.86	-	-	22,783.14	23,801.00
Previous License period (July 20)					
CPO (MT)	-	-	-	5,026.23	5,026.23
Total	1,017.86			27,809.37	28,827.23

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12. Actual Sold Volume (PK)					
Current License period (Aug 20 – Mar 21)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	619.80	-	-	6,358.71	6,978.51
Previous License period (July 20)					
PK (MT)	-	-	-	697.03	697.03
	619.8			7,055.74	7,675.54
Remark: Opening Stock of August 2020: 731.75MT which carried forward from the production of July 2020.					

13. Independent Smallholders Certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	-	-
IS-CSPKO	-	-
IS-CSPKE	-	-

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: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
Website: www.bsigroup.com

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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 19 – 22/04/2021 The audit programme is included as Section 2.3.

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

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

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (and smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held 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 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 3.5.

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All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re- Certification)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Sungai Dingin Palm Oil Mill	√	√	√	√	√
Sungai Dingin Estate		√		√	√
Padang Buluh Estate	√			√	
Bukit Selarong Estate		√			√
Anak Kulim Estate		√		√	
Bukit Hijau Estate	√		√		
Jentayu Estate			√		√
Somme Estate	√		√		

Tentative Date of Next Visit: April 4, 2022 - April 7, 2022

Total No. of Mandays: 12 mandays

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Hu Ning Shing	Team Leader	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She attended Endorsed MSPO Auditor and MSPO SCCS Lead Auditor Course in 2019. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social,

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		legal, workers & stakeholders consultation and SCC for CPO mill. She is fluent in Bahasa Malaysia and English languages.
Amir Bahari	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English.
Vijay Kanna	Team Member	He holds a bachelor's degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010. He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019. During this assessment, he assessed on the aspects of Occupational, Health & Safety and estate best practises. He is fluent in Bahasa Malaysia and English languages.

Accompanying Persons:

Name	Role
N/A	N/A

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	HNS	VK	AB
Sunday 18/04/2021	PM	Auditors travel to Sunway Hotel, Seberang Jaya	√	√	√
Monday 19/04/2021 Sungai Dingin Palm Oil Mill	0830 - 0900	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). • Verification on previous audit findings 	√	√	√
	0900 - 1200	Sungai Dingen Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.	√	√	√

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	1200 - 1300	Lunch	√	√	√
	1300 - 1630	Sungai Dingin Palm Oil Mill 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 etc. RSPO Supply Chain Site visit: Incoming of FFB and outgoing of CSPO & CSPK – weighbridge, ramp, storage area, loading bays, etc. Documentation review: RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√
	1630 - 1730	Interim Closing Briefing	√	√	√
Tuesday 20/04/2021	0830 - 1200	Sungai Dingin Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1000 – 1100	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1200 – 1300	Lunch	√	√	√
	1300 - 1630	Sungai Dingin Estate 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 - 1730	Interim Closing Briefing	√	√	√
Wednesday 21/04/2021	0830 - 1200	Anak Kulim Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1200 – 1300	Lunch	√	√	√
	1300 - 1630	Anak Kulim Estate 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 - 1730	Interim Closing Briefing	√	√	√

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Date	Time	Subjects	HNS	VK	AB
Thursday 22/04/2021 Bukit Selarong Estate	0830 - 1200	Bukit Selarong Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1200 – 1300	Lunch	√	√	√
	1300 - 1600	Bukit Selarong Estate 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 – 1630	Verify any outstanding issues & Preparation for closing Meeting	√	√	√
	1630 - 1730	Closing Meeting	√	√	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Sime Darby Plantation Berhad Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Malaysia National Interpretation 2019 for RSPO P&C 2018
- Independent Smallholder Standard 2019

3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table. As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations .	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No. There are no new acquisition.	Yes
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. Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019. Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.	Yes

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	<p>Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public notification letter: https://www.rspo.org/certification/public-announcement.</p> <p>Malaysia - Pekaka Mill is being mothballed (at the time of SDP Annual Report 2018) and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang. Bintang Oil Mill: SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public notification letter: https://www.rspo.org/certification/public-announcement.</p> <p>For Liberia operations: As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operation</p> <p>ACOP 2019 has been cross-referenced as below: https://document.rspo.org/Sime_Darby_Plantation_Berhad_ACOP2019.pdf.</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>There are no lapses in implementation of the plan.</p>	<p>Yes</p>
<p>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</p>	<p>There were no failures to proceed with implementation of the plan.</p> <p>Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above.</p>	<p>Yes</p>

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Un-Certified Units or Holdings		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<p>HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p>	<p>Yes</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>No new plantings. As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operation.</p>	<p>Yes</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above. Refer to the RaCP Tracker for details of RaCP-0356. https://www.rspo.org/certification/remediation-and-compensation/racp-tracker#growerTracker. Total 21 management units with potential liability and total 21 LUCA has been submitted. 7 out of 21 LUCA has been completed. 8 management units have submitted for compensation plan and 14 management units are required to submit for remediation plan.</p>	<p>Yes</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p>	<p>No stakeholder comments or complaints received.</p>	<p>Yes</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Yes</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>Yes. The sustainability unit has conducted the internal audit for 9 units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. Other than that, land conflicts and land disputes also being audited and approved by Head of Sustainability-Indonesia (Alagendran Maniam) on 22/05/2019.</p>	<p>Yes</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Yes</p>

3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	No scheme smallholder under SOU 1 Sungai Dingin POM.	N/A

3.4 Details of Nonconformities

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

During this Assessment there were one (1) Minor nonconformity and one (1) Opportunity for Improvement raised. The SOU 1 Sungai Dingin Palm Oil Mill and Supply Bases Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2042487-202104-N1	Clause & Category (Critical / Minor)	2.2.2 Minor
Date Issued	22/04/2021	Due Date	Next Surveillance Assessment
Closed (Yes / No)	No	Date of nonconformity Closure	N/A
Statement of Nonconformity:	Due diligence of contractors was not available.		
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:	Sg. Dingin Estate: The FFB Transporter, Noor Azizah Sedim Enterprise who have 3 lorry drivers transporting FFB from estate to mill. However, there are non-compliance by the contractor as below:		

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- i. He did not make the correct EPF contribution for the workers as he only made contribution for the salary of RM 1,100. However, the workers' salary was RM 1,200.
- ii. No evidence to show that the SOCSO contribution was made for October 2020 and November 2020.
- iii. No contribution of EIS for the 3 workers since enforcement on January 2018.
- iv. The employment contract of the 3 workers are based on piece-rated under Clause 4. However, the contractor informed that the workers are under monthly rated.
- v. Terms and conditions of the employment contract such as notice period, annual leave, public holiday entitlement and medical leave were not available.
- vi. Reviewed the payslips and FFB Despatch by Field for September 2020, December 2020 and March 2021 found that the workers have worked on rest day. However, no evidence to show that the workers have paid as per Employment Act 1955 for the work on rest day. Interviewed with the contractor confirmed that he did not pay as per Employment Act 1955, Section 60 (3) (b). Sampled of workers as below:

I/C No.	Date of Work on Rest Day		
871224-02-56XX	13/09/2020,	20/09/2020,	27/09/2020,
810903-02-58XX	06/12/2020,	13/12/2020,	20/12/2020,
740520-02-64XX	27/12/2020,	07/03/2021,	14/03/2021,
	21/03/2021 and 28/03/2021		

Anak Kulim Estate:

Non-compliance of contractors as below:

AMZ Gemilang Enterprise:

- i. The worker (I/C No.: 820215-02-57XX) as a backhoe driver was paying RM 1,100 per month as verified in the payslip from January 2021 – March 2021. However, the location of workplace is under *Majlis Perbandaran Kulim* where it shall be RM 1,200 per month.
- ii. EPF and SOCSO contribution made was incorrect where it made based on RM 1,100 wages where the actual wages of the workers are RM 1,200.
- iii. No evidence of EIS contribution was made.
- iv. The number of rest day was indicated wrongly at the number of public holidays in the payslip.

Mayang Bayumas Sdn Bhd:

- i. Employment contract which consists of terms and conditions such as type of wages, entitlement of annual leave, medical leave, public holiday, notice period, reason for dismissal and etc was not available.

Bukit Selarong Estate:

Non-compliance of contractor for the workers (I/C No.: 930903-02-53XX, 651122-02-58XX and 770623-02-61XX) as below:

Zaitunizan Binti Mahmud Husin:

- i. The EPF contribution stated in the employment contract was incorrect where it stated 11% for employer. As to now, the employer should contribute 13% for salary less than RM 5,000.

	<ul style="list-style-type: none"> ii. EPF and SOCSO contribution made was incorrect where it made based on RM 1,100 wages where the actual wages of the workers are RM 1,200. iii. The deduction of EPF and SOCSO from the salary of workers are incorrect. As informed by the contractor, they deducted based on the request of workers but not the legal requirements. iv. Overtime limit has exceeded the allowable limit of 104 hours per month in accordance to Employment Act 1955.
Corrections:	Brief to all contractor and ensure contractors comply with legal and others requirement. Contractors to submit documents and evidence related to estate management.
Root Cause Analysis:	<ul style="list-style-type: none"> 1. Monitoring on contract workers documentation not effective. 2. No responsible person in charge to monitor documentation of legal due diligence of contractors.
Corrective Actions:	<ul style="list-style-type: none"> 1. Estate management together with RSQM department will conduct a briefing on Employment Regulation 1957 to all the contractor. 2. Estate management has appointed PIC (Assistant manager & CC) to monitor contract workers documentation. Appointed PIC will ensure hired contract & their workers should comply with Employment Regulation 1957 and Akta Keselamatan Sosial Pekerja 1969 and documented. The legal due diligence of contractors documents will be put on the list for monitoring and tracking on monthly basis.
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Implementation of the corrective action plan will be verified during next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1 2042487- 202104- I1	3.7.2 Training on the GHG submission could be escalated to the person in charge in the mill.

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 2	Positive feedbacks from internal and external stakeholders.
PF 3	Good retrieval of documentations.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity																																
NCR Ref #	1923219-202006-M1	Clause & Category (Critical / Minor)		6.2.3 - Critical (Major)																												
Closed (Yes / No)	Yes	Date of nonconformity Closure		28/09/2020																												
Statement of Nonconformity:	Sg. Dingin POM has yet to comply with the terms and conditions stated in the approval permit for allowing female workers to work from 10pm to 5am.																															
Requirement Reference:	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.																															
Objective Evidence:	<p>The mill has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for allowing female workers to work from 10pm to 5am. Seen the approval letter with Ref. No.: BHG PU/9/135 Jld 14(18) dated 02/08/2018. There are terms and conditions that must be comply by the company and two of them are as below:</p> <p>iii. Provide the female workers a rest time from work for 11 hours continuously before entering to work.</p> <p>iv. Female workers that work on night shift must be given weekly rest day not less than 30 hours continuously.</p> <p>However, sampled the female workers Daily Input Form and Punch Card for March 2020 and April 2020 found that the management did not comply with the terms and conditions above.</p> <table border="1"> <thead> <tr> <th>Employee No.:</th> <th>Time In</th> <th>Time Out</th> <th>Time In</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td colspan="5">26831</td> </tr> <tr> <td rowspan="2">March 20</td> <td>07/03/2020 15:47</td> <td>08/03/2020 8:00</td> <td>09/03/2020 07:41</td> <td>08/03/2020 is off-day. Less than 30 hours of continuous rest for a week.</td> </tr> <tr> <td>14/03/2020 07:37</td> <td>14/03/2020 18:00</td> <td>15/03/2020 07:53</td> <td>15/03/2020 is off-day but work on rest day. Time out on 15/03/2020 was 16:00. Less than 30 hours of continuous rest for a week.</td> </tr> <tr> <td rowspan="2">April 20</td> <td>04/04/2020 15:50</td> <td>05/04/2020 07:00</td> <td>06/04/2020 07:37</td> <td>05/04/2020 is off-day. Less than 30 hours of continuous rest for a week.</td> </tr> <tr> <td>18/04/2020 15:48</td> <td>19/04/2020 06:00</td> <td>20/04/2020 08:06</td> <td>19/04/2020 is off-day. Less than 30</td> </tr> </tbody> </table>				Employee No.:	Time In	Time Out	Time In	Remarks	26831					March 20	07/03/2020 15:47	08/03/2020 8:00	09/03/2020 07:41	08/03/2020 is off-day. Less than 30 hours of continuous rest for a week.	14/03/2020 07:37	14/03/2020 18:00	15/03/2020 07:53	15/03/2020 is off-day but work on rest day. Time out on 15/03/2020 was 16:00. Less than 30 hours of continuous rest for a week.	April 20	04/04/2020 15:50	05/04/2020 07:00	06/04/2020 07:37	05/04/2020 is off-day. Less than 30 hours of continuous rest for a week.	18/04/2020 15:48	19/04/2020 06:00	20/04/2020 08:06	19/04/2020 is off-day. Less than 30
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				hours of continuous rest for a week.
26878				
March 20	07/03/2020 15:48	08/03/2020 07:01	08/03/2020 07:56	08/03/2020 is off-day but work on rest day. Time out on 08/03/2020 was 15:04. Less than 11 hours rest before entering work and less than 30 hours of continuous rest for a week.
	21/03/2020 15:51	22/03/2020 07:02	23/03/2020 07:52	22/03/2020 is off-day. Less than 30 hours of continuous rest for a week.
50752				
March 20	09/03/2020 15:54	10/03/2020 07:06	10/03/2020 15:58	Not having 11 hours continuous rest before entering to work.
	14/03/2020 15:54	15/03/2020 07:00	16/03/2020 07:58	15/03/2020 is off-day. Less than 30 hours of continuous rest for a week.
Corrective Actions:	<p>1. Mill will increase the intake of male workers for shift operation and relocate the female worker to the general duties on day shift.</p> <p>2. Mill will request for exemption from JTK under the term & condition given.</p>			
	<p>Major NC Close Out:</p> <p>1. Sungai Dingin Mill has hired 5 new male workers to increase the workforce and minimize the lengthy hours and minimal that had been previously assigned to the female workers. Sighted the Master records with the job assigned to the 5 mentioned male workers.</p> <p>2. The mill has produced a memo dated 1st September 2020 to all workers stating that the latest the night shift workers can work on Monday to Friday is at 5am, the latest a worker can work on Saturday is 2am and Sunday (Restday) work is not allowed.</p> <p>3. Interview with the female workers indicated that they were now provided a rest time from work for 11 hours continuously before entering to work and those that work on night shift were given a weekly rest day not less than 30 hours continuously.</p>			

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	<p>4. The mill has applied to JTK for exemption on the terms and conditions for female workers night work approval. Sighted the copy of the application letter dated 23rd August 2020. The application is pending approval.</p> <p>Based on the above evidence, the major NC is closed effectively on 28/09/2020. Continuous implementation will be further verified in the next assessment.</p>
Assessment Conclusion:	<p>Verification during ASA2_1, Verified the punch card for March 2021 and April 2021 for female workers (Employee No.: 26878, 26836 and 26831) found that they worked according to the approved limit and as per the memo issued on 01/09/2020. The female workers also given at least 11 hours rest before entering to work after night shift.</p> <p>Thus, the major non-conformance remained closed.</p>

Non-conformity			
NCR Ref #	1923219-202006-M2	Clause & Category (Critical / Minor)	6.7.3 - Critical (Major)
Closed (Yes / No)	Yes	Date of nonconformity Closure	28/09/2020
Statement of Nonconformity:	PPE was not use appropriately by workers to cover potentially hazardous operations.		
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><u>Bukit Hijau Estate:</u></p> <p>During visit to Bukit Hijau Estate main division field block 2000C (R18) for spraying operation activity sampling, it was sighted that the sprayers were conducting spraying work without wearing goggle. Interview with sprayers revealed that they were provided with complete PPE for spraying including respirator, apron, rubber glove, rubber boot and helmet as well as clear goggle. Cross-checking with PPE issuance record also confirmed that the estate provided the sprayers with complete PPE as per Pictorial PPE Standard for spraying operation.</p> <p>However the workers complaint that the clear goggle issued would cause sighting hazard upon wearing since the goggle screen would be covered with precipitated mist especially during hot weather, hence they would rather not wearing them. The practice deemed unable to cover all potentially hazardous operations related to spraying activities.</p>		
Corrective Actions:	<p>Estate Management will discuss with RSQM Northern team and workers to identify the suitable goggle that will minimize the mist present during spraying activity.</p> <p><u>Major NC Close Out:</u></p>		

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	<p>1. Bukit Hijau Estate have conducted an Improvement and Feedback meeting dated 03/09/2020 to discuss on the suitability of the goggles that have been provided to the sprayers for spraying operations. They also discussed on the possible use of face shield and anti-fogging glasses. Interview and trails were done by the SQM on workers using the 3 mentioned PPEs. A decision was made where it was concluded that the face shield was the most appropriate PPE to be used. The minutes of the meeting and PPE assessment was available for verification.</p> <p>2. The Spraying SOP was revised dated August 2020 to replace the use of Eye Goggles to Face Shield as one of the compulsory PPE to be used during the operation. The revised SOP was available for verification.</p> <p>3. HIRARC was revised on 03/09/2020 where the changes in eye protection (goggles to face shield) due to wearing goggles could lead to mist accumulated and cause a new hazard. CHRA was due to be updated on 09/10/2020 where the face shield is to be included. The revised HIRARC was available for verification.</p> <p>4. All Sprayers were retrained on the revised SOP and HIRARC for spraying operations which included the updated changes in eye protection PPE. Training records dated 11/09/2020 was available for verification.</p> <p>5. A PPE Inspection form was available where the supervisor inspects all required PPE (including the Face Shield) on a daily basis to ensure that all PPE stated in the SOP is worn by the sprayers prior to starting spraying work.</p> <p>Based on the above evidence, the major NC is closed effectively on 28/09/2020. Continuous implementation will be further verified in the next assessment.</p>
Assessment Conclusion:	<p>Verification during ASA2_1,</p> <p>All workers have been provided with appropriate personal protective equipment (PPE) for all operations, which is provided by the management free of charge. During the field visit to the Spraying Gang at Sungai Dingin Estate, and Bukit Selarong Estate, it was sighted that all required PPEs were worn by the sprayers. Safety Goggles and Face Shield were provided by the management and worn by the sprayers during the field visit. Interview with the respective sprayers showed that the workers are aware of the importance of wearing the mentioned safety goggles and face shield during the spraying operations.</p> <p>Thus, the major non-conformance remained closed.</p>

Non-conformity			
NCR Ref #	1923219-202006-N1	Clause & Category (Critical / Minor)	4.2.3 - Non - Critical (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/04/2021
Statement of Nonconformity:	Management of Somme Estate did not keep the complainant informed of the progress, including against agreed timeframe and the outcome of the complaint lodged.		
Requirement Reference:	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.		

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Objective Evidence:	Site visit to the sundry shop in Somme Estate and the owner has complaint that the zinc roof of the shop was broken, and the woods of the roof was ruptured by termites. He has lodged complaint during the stakeholder meeting conducted on 11/02/2020 and the management informed that will take action accordingly. The management has submitted the Non-essential items purchase approval on 12/06/2020 for top management approval. The top management disapproved and required for more quotation on 12/06/2020. However, the complainant has yet to inform on the progress since the complaint has lodged more than 4 months.
Corrective Actions:	Estate management to monitor/follow up the request and keep update the progress to the complainant, Estate Management review complaint logbook weekly basis and verify by Asst. Manager and to response/reply within 14 days as per SDP SOP. RSQM-NTR to conduct training regarding the procedure for internal/external communication.
Assessment Conclusion:	Verification during ASA2_1, A briefing on the communication procedure was conducted on 20/08/2020 to the person in charge from both Somme Estate and Anak Kulim Estate. Seen the training attendance record. The management has incorporated the issue into the Management Plan on Social Impact Assessment (2021) with detail action plan was clearly identified. Status of the action was updated in the management plan and the issue was closed on February 2021. The complainant has acknowledged after the complaint has been resolved on 03/03/2021. Seen the acknowledgement letter. The implementation of the corrective action was found effective and thus the minor non-conformity was closed on 22/04/2021.

Non-conformity			
NCR Ref #	1923219-202006-N2	Clause & Category (Critical / Minor)	7.3.1 - Non - Critical (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/04/2021
Statement of Nonconformity:	Waste management plan for EFB was not effectively implemented		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Objective Evidence:	Sighted during site visit at EFB dumping area, noted that the EFB was spilled over from the designated EFB dumping area. The leachate from the EFB flow on the ground into the estates field.		
Corrective Actions:	To reconstruct the ground drain leading to the leachate pit to be pump to ETP Pond.		
Assessment Conclusion:	Verification during ASA2_1, The EFB stock level in the mill is at the manageable level. No overspill was observed outside the designated area. There was no leachate seepage into the monsoon drain. The mill has completed and commissioned on 27/08/2020 a ground drain leading to the leachate pit to be pumped to ETP pond. Photos of the construction were provided to the auditor and verified.		

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	The implementation of the corrective action was found effective and thus the minor non-conformity was closed on 22/04/2021.
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Non-conformity																			
NCR Ref #	1923219-202006-N3	Clause & Category (Critical / Minor)	7.3.2 - Non - Critical (Minor)																
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/04/2021																
Statement of Nonconformity:	The awareness of proper recycle waste material disposal is not effectively delivered to the workers.																		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.																		
Objective Evidence:	<p><u>Padang Buluh Estate:</u> Sighted during site visit at housing area and landfill, there evidence of recycle waste such as plastic bottle were disposed together with the domestic waste. Sighted during site visit at the workshop, empty paint container were not handled as scheduled waste.</p> <p><u>Bukit Hijau Estate:</u> Sighted during site visit at landfill in field 2003B, there evidence of recycle waste such as plastic bottle were disposed together with the domestic waste.</p>																		
Corrective Actions:	<p><u>Padang Buluh Estate:</u> 1. To have permanent person in charge of recycle waste, to monitor and recording purposes. 2. To conduct Scheduled Waste training to all estate personal.</p> <p><u>Bukit Hijau Estate:</u> Estate management to be establish organisation related recycle waste and ensure all workers to aware and concern about segregation recycling waste as a part of their daily routine.</p>																		
Assessment Conclusion:	<p>Verification during ASA2_1, Site visit to the following estates/ mill confirmed the following: Sg Dingin Estate and Mill use the services of <i>Majlis Daerah Kulim</i> for the domestic waste disposal. Bukit Selarong Estate and Anak Kulim Estate managed the waste management using their own landfill area at P1999M2, P2018D and P2001A respectively. Both sites were visited and confirmed that the management of the area is as per SOP. Signboards were available with the opening/ closing dates shown therein. There was no empty containers/ recycled materials in the visited landfills. Training made in relation to the waste management to the employees as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Subject</th> <th>Anak Kulim</th> <th>Bukit Selarong</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SW Management & Disposal (All employees)</td> <td>12/04/2021</td> <td>12/03/2021</td> </tr> <tr> <td>2</td> <td>Domestic waste management (All employees)</td> <td>17/08/2020</td> <td>03/03/2021</td> </tr> <tr> <td>3</td> <td>Town hall session (All employees)</td> <td>14/08/2020</td> <td>09/12/2021</td> </tr> </tbody> </table>				Subject	Anak Kulim	Bukit Selarong	1	SW Management & Disposal (All employees)	12/04/2021	12/03/2021	2	Domestic waste management (All employees)	17/08/2020	03/03/2021	3	Town hall session (All employees)	14/08/2020	09/12/2021
	Subject	Anak Kulim	Bukit Selarong																
1	SW Management & Disposal (All employees)	12/04/2021	12/03/2021																
2	Domestic waste management (All employees)	17/08/2020	03/03/2021																
3	Town hall session (All employees)	14/08/2020	09/12/2021																

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	4	Environmental Conservation (All employees)	(All)	25/02/2020	02/02/2020
<p>The other estates provide training records in relation to the NCR raised with details as follows. Padang Buloh Estate appointed a PIC for the waste management via letter dated 01/04/2021 En Borhanudin Said - Healthcare Assistant by the Assistant Manager.</p>					
		Subject		Padang Buloh	Bukit Hijau
	1	SW Management & Disposal (All employees)	(All)	29/12/2020	-
	2	Recycled waste management (All employees)	(All)	29/12/2020	-
	3	<i>Pengurusan Kitar Semula</i> (All employees)		-	06/10/2020
<p>Site interview with the workers confirmed and supported that training were conducted and workers understood the disposal method in the estates. The implementation of the corrective action was found effective and thus the minor non-conformity was closed on 22/04/2021.</p>					

Non-conformity			
NCR Ref #	1923219-202006-N4	Clause & Category (Critical / Minor)	7.3.3 - Non - Critical (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/04/2021
Statement of Nonconformity:	There evidence on use of fire for waste disposal.		
Requirement Reference:	The unit of certification does not use open fire for waste disposal.		
Objective Evidence:	Sighted during site visit at the landfill, there was evidence of open burning used for domestic waste disposal in the landfill.		
Corrective Actions:	To have proper fencing & signboard surrounding landfill area to ensure no trespassing. To have regularly patrol by AP or workers appointed by the management to ensure no trespassing allowed.		
Assessment Conclusion:	<p>Verification during ASA2_1, Site visit to the following estates/ mill confirmed the following: Sg Dingin Estate and Mill use the services of <i>Majlis Daerah Kulim</i> for the domestic waste disposal. Bukit Selarong Estate and Anak Kulim Estate managed the waste management using their own landfill area at P1999M2, P2018D and P2001A respectively. Both sites were visited and confirmed that the management of the area. Signboards were available with the dates shown therein. There were no sighting of empty containers and recycled materials in the respective landfill. There was no sign fire being used for the disposal.</p> <p>The implementation of the corrective action was found effective and thus the minor non-conformity was closed on 22/04/2021.</p>		

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Non-conformity			
NCR Ref #	1923219-202006-N5	Clause & Category (Critical / Minor)	6.7.2 - Non - Critical (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/04/2021
Statement of Nonconformity:	First aid equipment available at worksite was contained with expired medicine.		
Requirement Reference:	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.		
Objective Evidence:	<u>Bukit Hijau Estate:</u> Visit to Bukit Hijau Estate workshop found that the first aid box kept in workshop containing external use medicine that was expired on 31/5/2020.		
Corrective Actions:	Estate to ensure the monthly monitoring to be done accordingly without delay, All item expiry date to be display on notification board to reminded purpose (master list).		
Assessment Conclusion:	<p>Verification during ASA2_1,</p> <ol style="list-style-type: none"> Evidence was provided that Bukit Hijau Estate are conducting monthly monitoring on all the first aid kits in the estate. Verified the monitoring checklist dated 29/01/2021 for the first aid box located at the main division. All items have been checked on the availability and expiry date and have been found to be in acceptable condition. Visit to Sungai Dingin POM, Sungai Dingin Estate, Anak Kulim Estate and Bukit Selarong Estate indicated that the first aid kits are being monitored regularly as well. The units have maintained a list of available first aid kits, the person responsible for the first aid kits, the monthly monitoring records by the Medical Assistant and the training records for the First Aid Kit Holders. The trainings were verified to be as below: <ul style="list-style-type: none"> - Sungai Dingin POM - 18/01/2021 - Sungai Dingin Estate - 17/04/2021 - Anak Kulim Estate – 23/03/2021 - Bukit Selarong Estate – 29/03/2021 <p>During the visit to the mill operations and field visit at the estate operations, it was justified that all the sampled first aid kit boxes were well replenished with all required items. There was no evidence of any expired items in any of the boxes sampled in the mill and estates.</p> <p>The implementation of the corrective action was found effective and thus the minor non-conformity was closed on 22/04/2021.</p>		

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Opportunity for Improvement	
OFI#	Description
OFI 1	<p>All Estates and POM: Stakeholder list could be further improved with updated contact, details and nominated representatives.</p> <p>Verification during ASA2_1,</p> <p>List of stakeholders was established in the mill and estates. Stakeholder such as local communities, authorities, contractors, suppliers, FFB suppliers and NGOs were included in the list. Nominated representative with contact number and address was sighted.</p> <p>Thus, the OFI was closed.</p>
OFI 2	<p>Minimum Wage Order 2020 was implemented on February 2020 by the government. The estates and mill's management were paid the wages of workers on February 2020 according to old Minimum Wage Order 2019. All the operating units received an email dated 22/06/2020 from Plantation IT related to arrears payment for wages on February 2020. According to the checkroll clerks, they will reimburse the balance of wages for February 2020 on June 2020's wages. This will be verified during next assessment.</p> <p>Verification during ASA2_1,</p> <p>Verified 48 payslips in the mill and estate found that the reimbursement was carried out on June 2020's wage.</p> <p>Thus, the OFI was closed.</p>

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1767947-201904-N1	Minor	5.1.2	26/04/2019	Closed on 01/07/2020
1767947-201904-N2	Minor	4.1.3	26/04/2019	Closed on 01/07/2020
1767947-201904-N3	Minor	5.6.3	26/04/2019	Closed on 01/07/2020
1923219-202006-M1	Critical	6.2.3	01/07/2020	Closed on 28/09/2020
1923219-202006-M2	Critical	6.7.3	01/07/2020	Closed on 28/09/2020
1923219-202006-N1	Minor	4.2.3	01/07/2020	Closed on 22/04/2021
1923219-202006-N2	Minor	7.3.1	01/07/2020	Closed on 22/04/2021
1923219-202006-N3	Minor	7.3.2	01/07/2020	Closed on 22/04/2021
1923219-202006-N4	Minor	7.3.3	01/07/2020	Closed on 22/04/2021
1923219-202006-N5	Minor	6.7.2	01/07/2020	Closed on 22/04/2021
2042487-202104-N1	Minor	2.2.2	22/04/2021	"Open"

3.5 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 SOU 1 Sungai Dingin Palm Oil Mill and Supply Bases Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace 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 below.

List of Stakeholders contacted	
Internal Stakeholders Workers (Different Nationalities) Gender Representatives	Union/Contractors Contractors NUPW Representatives
Government Departments School Representatives (SJK (T) Ladang Sg. Dingin, SJK (T) Ladang Dublin, SK Ladang Dublin, SK Terap, SJK (T) Ladang Anak Kulim, SJK (T) Ladang Bukit Selarong, SK Bukit Selarong)	NGO/ Communities/ Neighbouring villages Local Communities (Kg. Dingin, Kg. Baru, Penghulu Mukim Padang Meiha, Kg Siam) Neighbouring Plantation (Ladang Sg. Ular)

Stakeholders comment	
1	Feedbacks: NUPW Representatives -They informed that the management did not involve in the selection of NUPW representatives. All the representatives are elected by the workers. No issue reported by the workers during the time of audit. All the issues raised during NUPW meeting were resolved by the management. There were some issues raised on the transfer of workplace in Anak Kulim Estate. However, the management has discussed and resolved the issues immediately.
	Management Responses: The management will ensure any issue raise by the union will be solved accordingly.
	Audit Team Findings: Details refer to Indicator 6.3.2.
	Feedbacks:

<p>2</p>	<p>Local communities’ Representatives – They informed that no land encroachment by the management and no land dispute reported. Demarcation of boundaries by the trenches, fencing and boundary stones were available. The management will help whenever they requested for help. They have good relationship with the management. Job opportunities were offered to the local communities as well.</p> <p>Management Responses: The management will continue to maintain good relationship with the local communities.</p> <p>Audit Team Findings: No other issue.</p>
<p>3</p>	<p>Feedbacks: Contractors – They informed that they have signed agreement prior to provide any services in the company. Pricing and payment terms were stated in the contract and briefed to them. They have been briefed on the complaint mechanism and invited to stakeholder meeting. The payment was made promptly by the management.</p> <p>Management Responses: The management will continue to maintain good relationship with the contractors.</p> <p>Audit Team Findings: No further issue.</p>
<p>4</p>	<p>Feedbacks: Gender Committees’ Representatives – They informed that no case of sexual harassment and violence reported. The management has given the flexibility to the new mothers for their needs. They were treated equally and given same opportunity as the male such as promotion as mandora in the estate.</p> <p>Management Responses: The management will continue to monitor if there is any case of sexual harassment reported.</p> <p>Audit Team Findings: No other issue.</p>
<p>5</p>	<p>Feedbacks: Schools’ Representatives – The representatives informed that the management from the estates and mill are very attentive and supportive. The managements will assist whenever they requested for any assistance from the management. They have good relationship with the managements. They also informed that no child labour was sighted in the estates.</p> <p>Management Responses: The management will continue to maintain good relationship with the representatives.</p> <p>Audit Team Findings: No further issue.</p>
<p>6</p>	<p>Feedbacks: Workers – The workers informed that they are understood the employment contract signed by them. The management has explained to them the terms and conditions of the employment contract. There was no contract substitution occurred. The job promised in their home countries is similar to what they have work in Malaysia. They also informed that they have easy access to their passport as the passport is currently keep in the passport locker near the Security Guard Post. No discrimination reported as the management treated them equally. They have been offered with Contract for Service for any temporary work such as repaint of the houses by the company to earn more income.</p>

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	Management Responses: The management will ensure the workers are treated equally.
	Audit Team Findings: No other issue.

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
N/A	N/A	N/A	N/A	N/A	N/A
Not applicable as Sime Darby acquired (freehold and leased) all the land directly from the state of Kedah State government.					

Previous land owner / user comment	
	Feedbacks: N/A
	Management Responses: N/A
	Audit Team Findings: N/A


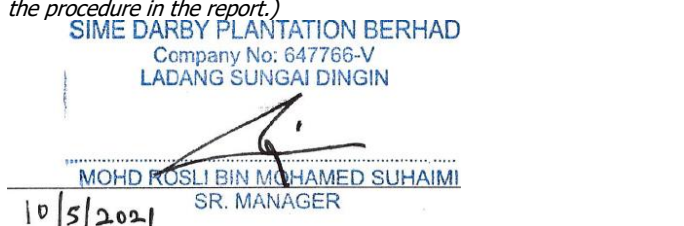
3.6 Impartiality and conflict of interest

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

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that SOU 1 Sungai Dingin Palm Oil Mill and Supply Bases has complied with the Malaysia National Interpretation 2019 for RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of SOU 1 Sungai Dingin Palm Oil Mill and Supply Bases is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: Hu Ning Shing	Name: Mohd Rosli bin Mohamed Suhaimi
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Sime Darby Plantation Berhad
Title: Lead Auditor	Title: Senior Manager Sg. Dingin Estate (SOU 1 Chairman)
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>  <p>SIME DARBY PLANTATION BERHAD Company No: 647766-V LADANG SUNGAI DINGIN</p> <p>MOHD ROSLI BIN MOHAMED SUHAIMI SR. MANAGER</p> <p>10/5/2021</p>
Date: 08/05/2021	Date: 10/05/2021

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>	Publicly available management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available. All operating units have individual documents and records to demonstrate compliance to this indicator. Sustainability Reports, policies and procedures are also accessible through the company’s website: http://www.simedarbyplantation.com/ .	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	All the related information was in Bahasa Malaysia and English and accessible to the stakeholders upon request.	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	The mill and estates have implemented visitor book, complaint book and inspection book to record any requests from the stakeholders. Seen the DOE visiting book where the officer last visited on 22/02/2021 with no issue was found. Besides, seen the records of communication such as official letter from stakeholders to request for assistance from the management.	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	Sime Darby Plantation Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 1/4/2008). The procedure has detailing the process of handling complaints from stakeholders and the time frame for external communication to be dealt with. The time frame	Complied

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		<p>to provide feedback is within two weeks of the date of receipt for communication and within one week of the completion of the investigation.</p> <p>Senior Manager of Sungai Dingin POM, Acting Senior Manager of Sg. Dingin Estate, Manager of Anak Kulim Estate and Acting Senior Manager of Bukit Selarong Estate has been appointed by Region CEO as social officer for the mill and appointment letter dated 02/01/2021 was sighted. Besides, the Senior Manager of mill has appointed Assistant Manager as the social officer to handle any social issue reported in the mill and appointment letter dated 01/01/2021 was sighted.</p> <p>Sg. Dingin POM, Sg. Dingin Estate, Anak Kulim Estate and Bukit Selarong Estate has sent letter to the stakeholders to collect feedback towards the management during this period due to Covid-19 pandemic. Letters dated 17/03/2021 and 07/04/2021 from Sg. Dingin POM, 08/02/2021 and 16/04/2021 from Sg. Dingin Estate, 19/02/2021 from Anak Kulim Estate and 15/04/2021 from Bukit Selarong Estate that sent to stakeholders were sighted and stakeholders such as authorities, contractors, suppliers and local communities. Evidence of letter sent with acknowledgement of receipt by stakeholders were sighted. There was no feedback received from the stakeholder in the mill and estates. There was one request from stakeholder of Anak Kulim Estate to organize seminar on management of plantations to the students. The management has developed the action plan and proposed to conduct the seminar on June 2021. Management of Bukit Selarong Estate has received the feedbacks from the stakeholders on 19/04/2021 and the management is in progress to develop the action plan. Interviewed with the stakeholders confirmed that they have received the feedback form from the management.</p>	
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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 was established in the mill and estates. Stakeholder such as local communities, authorities, contractors, suppliers, FFB suppliers and NGOs were included in the list. Nominated representative with contact number and address was sighted.</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>Sime Darby Plantation has developed and implemented Code of Business Conduct (Aug 2020) where the company implemented the integrity, respect & responsibility, enterprise and excellence during any business process. The policy was developed in Bahasa Malaysia, English and Bahasa Indonesia which can be downloaded via https://www.simedarbyplantation.com/corporate/ethical-business-practices. An OCP & Contractor training was organized by Group Sustainability Department on 14/04/2021 through Microsoft Teams. Seen the presentation slides of the briefing and COBC was briefed during the meeting.</p>	Complied
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>Sime Darby Plantation has implemented Whistleblowing Policy to help all stakeholders raise concerns, without fear of retaliation on any wrongdoing that they may observe in Sime Darby Plantation Group. The channels of whistleblowing are such as E-form that could be downloaded via https://www.simedarbyplantation.com/corporate/whistleblowing or through email, call or write letter to the Whistleblowing unit in Head Office. Besides, the company established Internal Audit to monitor the compliance and implementation of the policy throughout the plantations. Internal audit was carried out on 16/02/2021 in Sg. Dingin Palm Oil Mill, 18/02/2021 in Sg. Dingin Estate, 24/02/2021 in Anak Kulim Estate and 15/02/2021 in Bukit Selarong Estate. Sampled the contractors and vendors signed on Vendor Integrity Pledge:</p> <p>i. Company No.: 700973-M</p>	Complied

		<ul style="list-style-type: none"> ii. Company No.: 470134-U iii. Company No.: PG0305178-H iv. Company No.: RA 0026093-T 	
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 - Critical (Major) compliance -</p>	<p>Sime Darby Plantation Sdn Bhd has obtained approval from <i>Jabatan Tenaga Kerja Semenanjung Malaysia</i> for the following:</p> <ul style="list-style-type: none"> i. Ref. No.: BHG. PU/9/129 JLD 3 (53) dated 06/07/2017 for deduction of wages for electricity bill. ii. Ref. No.: BHG. PU/9/134 JLD 9 (11) dated 27/03/2017 for overtime limit for 130 hours. <p>SOU 1 mill and estates continues to comply with all verified legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. SOU 1 had obtained and renewed license and permits as required by the law. Among others the licenses/permit verified were:</p> <p><u>Sungai Dingin POM</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 530978004000; Processing Capacity: 380,000 Mt FFB a year; License Validity Period: 01/07/2021 – 30/06/2022. 2. Energy Commission License (Private Installation); Serial Number: 47019; License Number: 2020/02851; Installation Capacity: 4920 kW; License Validity Period: 19/12/2020 – 18/12/2021. 3. DOE License; License Number: 003648; License Validity Period: 01/07/2020 – 30/06/2021. 4. DOE License (Compliance Schedule); License Number: 004543; License Validity Period: 01/07/2020 – 30/06/2021. 	Complied

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		<p>5. Permit Barang Kawalan Berjadual; Reference Number: KPDNHEP.KLM (P) 01/2005; Description: Diesel; Storage Quantity: 18,500 Litres; License Validity Period: 24/10/2020 – 23/10/2021.</p> <p>6. Fire Certificate; Serial Number: 316563; Certificate Number: JBPM: KD/7/3/2017; Certificate Validity Date: 19/08/2020 – 18/08/2021.</p> <p><u>Sungai Dingin Estate</u></p> <p>1. MPOB License; License Number: 528696002000; Estate Area: 4255 Ha; License validity Period: 01/04/2021 – 31/03/2022.</p> <p>2. Air Receiver Tank License; Registration Number: KD PMT 4574; License Expiry Date: 18/04/2022.</p> <p>3. Permit Barang Kawalan Berjadual; License Reference Number: KPDNHEP.KLM (P) 34/1999; Serial Number: K001233; Description: Diesel (9,100 Litres) and Petrol (5,460 Litres); License Validity Period: 10/10/2020 – 09/10/2021.</p> <p>4. The estate has obtained approval from <i>Jabatan Tenaga Kerja Negeri Kedah</i> for deduction of wages as below:</p> <p style="margin-left: 20px;">i. Ref. No.: PMT/10203/2019/0020(5) dated 21/05/2019 for electricity bill.</p> <p style="margin-left: 20px;">ii. Ref. No.: PMT/10203/2019/0007(4) dated 21/05/2019 for Great Eastern Life Insurance.</p> <p><u>Anak Kulim Estate</u></p> <p>1. MPOB License; License Number: 524669002000; Estate Area: 1512.29 Ha; License Validity Period: 01/11/2020 – 31/10/2021.</p> <p>2. Permit Barang Kawalan Berjadual; Serial Number: K001191; Reference Number: KPDNHEP.KLM (P) 45/1999; Description: Diesel – From Licensed Wholesaler; Storage Capacity: 18,100 Litres. License Validity Period: 25/06/2020 – 24/06/2021.</p>
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		<p>3. Air Receiver License; Registration Number: KD PMT 1801; License Expiry Date: 16/06/2022.</p> <p>4. The estate has obtained approval from Pejabat Tenaga Kerja Kulim for deduction of wages as below:</p> <p style="padding-left: 20px;">i. Ref. No.: PMT/10203/00350(8) dated 29/09/2016 for electricity bill, water bill, temple and mosque fund.</p> <p><u>Bukit Selarong Estate</u></p> <p>1. MPOB License; License Number: 525104002000; Estate Area: 4387.02; License Validity Period: 01/12/2020 – 30/11/2021.</p> <p>2. MPOB License (Nursery); License Number: 54007501100; License Validity Period: 01/06/2020 – 31/05/2021.</p> <p>3. Permit Barang kawalan Berjadual; Serial Number: K001242; Reference Number: KPDNHEP.KLM (P) 06/2007; Description: Diesel; Storage Quantity: 10,000 Litres; License Validity Period: 04/11/2020 – 03/11/2021.</p> <p>4. Air Receiver Tank License; Registration Number: KD PMT 1030; License Number: PMT-KD/21 33229; License Expiry Date: 04/07/2022.</p> <p>5. The estate has obtained approval from Pejabat Tenaga Kerja Kulim for deduction of wages as below:</p> <p style="padding-left: 20px;">i. Ref. No.: PMT/10203/00359(9) dated 08/05/2017 for temple and mosque fund.</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>Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>All legal requirement was documented in Legal and Other Requirement Register.</p>	Complied

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		<p>Sighted the document 'Summary of Compliance' available at the estates and mill undersigned by the Head of Department (Mill Manager and Estate Manager). The document lists the latest applicable laws and amendment, revision dates and acknowledgement by the management. Sighted latest inclusion as follows:</p> <ul style="list-style-type: none"> - Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019 - Perintah Pencegahan dan Pengawalan Penyakit Berjangkit Peraturan-peraturan Pencegahan dan Pengawalan Penyakit Berjangkit (Langkah-langkah di dalam Kawasan tempatan) (No. 7) 2020. - Occupational Safety and Health (Noise Exposure) Regulations 2019. - Pesticides (Amendment of First Schedule) 2019 - Minimum Wages Order, amended 2020 <p>The LORR was verified to be prepared checked and approved by the management of the respective operating units. The LORR are reviewed and approved for compliance of the legal and other requirements annually and as and when there are new or amended applicable requirements.</p>	
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>All legal boundaries were clearly demarcated and visibly maintained, and there was no planting beyond the legal boundaries.</p> <p><u>Sungai Dingin POM</u></p> <p>The mill is located in the vicinity of Sungai Dingin Estate. The land title for Sungai Dingin Estate (Grant Number: 57873) was available for verification. The area surrounding the mill has been fenced to show the boundary of the mill with the estate.</p> <p><u>Sungai Dingin Estate</u></p>	Complied

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		<p>Although only some of the boundary stones were managed to be found by the estate, the demarcation of boundaries using concrete pole painted with red and white was obvious, especially at the boundaries with third parties. Verified the estate boundary with Gunung Inas Forest Reserve was demarcated with security trenches which was within the erected concrete pole.</p> <p>Anak Kulim Estate The estate was surrounded by oil palm plantations and smallholders. Visit to Field 2001 C boundary with PKNK Estate indicated the boundary pack was available coloured with red and white stripes (005° 18'48" N, 100°35'29" E). The estate has constructed security trenches within their area as well to clearly demarcate the estates boundary.</p> <p>Bukit Selarong Estate The estate has maintained a map indicating the boundary markers that were in place as well as the neighbouring entity next to their land. Visit to Field 2011C-2 boundary with Kampung Siam showed that the red and white pole was erected at coordinate lat. 005° 28'29" N, Lon. 100° 37'04" E. Boundary trenches was constructed along the legal boundary as verified during the site visit.</p>	
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained. - Minor compliance -</p>	<p>All Operating Units in SOU 1 have listed and maintained all contracted parties and documented in the List of Stakeholders as part of their stakeholders including internal stakeholders such as employee's representatives and workers union, and external stakeholders such as FFB suppliers, contractors, suppliers, transporters and government department.</p>	Complied

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<p>2.2.2</p>	<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>All Operating Units in SOU 1 have listed and maintained all contracted parties and documented in the List of Stakeholders as part of their stakeholders including internal stakeholders such as employee’s representatives and workers union, and external stakeholders such as FFB suppliers, contractors, suppliers, transporters and government department.</p> <p>All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with para:</p> <ul style="list-style-type: none"> - a (i); Vendor Code of Business Conduct (VCOBC) - a (ii); all applicable laws and regulations related anti-bribery, fraud, and corruption. <p>Sighted the sampled contractors contract agreement as follows:</p> <p><u>Sungai Dingin POM</u></p> <ol style="list-style-type: none"> 1. FFB Supplier: Koperasi Peserta-Peserta Rancangan Felcra Gugusan Sungai Malau Selama Berhad; Company Number. KOOP Kawasan No 430; Agreement Number: P/P/1220/FFB02590L; Effective Date: 01/01/2021. 2. FFB Supplier: Genting Plantations Berhad (Ladang Bukit Sembilan); Company Number: 197701003946; Agreement Number: P/P/1220/FFB02591L; Effective Date: 01/01/2021. 3. CPO Transporter: Mayang Bayumas Sdn Bhd (Company Number: 700973-M); Agreement Reference Number: T/SDPB/PEN/CPO/0720/003; Date: 12/12/2020. <p><u>Sungai Dingin Estate</u></p> <ol style="list-style-type: none"> 1. Transportation of FFB: Noor Azizah Sedim Enterprise (Company Number: PG0305178-H). <p><u>Anak Kulim Estate</u></p>	<p>Non-compliance</p>
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		<ol style="list-style-type: none"> 1. Replanting: Mont Dunia Enterprise (Company Number: PG 0316721-W). 2. AMZ Gemilang Enterprise; (Reference Number: NTR/003/2020/SOU1); Dated 12/03/202. <p><u>Bukit Selarong Estate</u></p> <ol style="list-style-type: none"> 1. Adhoc Contract for the transportation of FFB: Zaitunizan Binti Mahmud Husin; Dated 01/01/2021 for the duration 01/01/2021 – 30/06/2021 2. Adhoc Contract for the transportation of FFB: HHL Enterprise Sdn Bhd; Dated 01/01/2021 for the duration 01/01/2021 – 30/06/2021. <p><u>Sq. Dingin Estate:</u></p> <p><i>The FFB Transporter, Noor Azizah Sedim Enterprise who have 3 lorry drivers transporting FFB from estate to mill. However, there are non-compliance by the contractor as below:</i></p> <ol style="list-style-type: none"> i. <i>He did not make the correct EPF contribution for the workers as he only made contribution for the salary of RM 1,100. However, the workers' salary was RM 1,200.</i> ii. <i>No evidence to show that the SOCSO contribution was made for October 2020 and November 2020.</i> iii. <i>No contribution of EIS for the 3 workers since enforcement on January 2018.</i> iv. <i>The employment contract of the 3 workers are based on piece-rated under Clause 4. However, the contractor informed that the workers are under monthly rated.</i> v. <i>Terms and conditions of the employment contract such as notice period, annual leave, public holiday entitlement and medical leave were not available.</i> vi. <i>Reviewed the payslips and FFB Despatch by Field for September 2020, December 2020 and March 2021 found</i> 	
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that the workers have worked on rest day. However, no evidence to show that the workers have paid as per Employment Act 1955 for the work on rest day. Interviewed with the contractor confirmed that he did not pay as per Employment Act 1955, Section 60 (3) (b). Sampled of workers as below:

<i>I/C No.</i>	<i>Date of Work on Rest Day</i>	
<i>871224-02-56XX</i>	<i>13/09/2020,</i>	<i>20/09/2020,</i>
<i>810903-02-58XX</i>	<i>27/09/2020,</i>	<i>06/12/2020,</i>
<i>740520-02-64XX</i>	<i>13/12/2020,</i>	<i>20/12/2020,</i>
	<i>27/12/2020,</i>	<i>07/03/2021,</i>
	<i>14/03/2021,</i>	<i>21/03/2021 and</i>
	<i>28/03/2021</i>	

Anak Kulim Estate:

Non-compliance of contractors as below:

AMZ Gemilang Enterprise:

- i. The worker (I/C No.: 820215-02-57XX) as a backhoe driver was paying RM 1,100 per month as verified in the payslip from January 2021 – March 2021. However, the location of workplace is under Majlis Perbandaran Kulim where it shall be RM 1,200 per month.*
- ii. EPF and SOCSO contribution made was incorrect where it made based on RM 1,100 wages where the actual wages of the workers are RM 1,200.*
- iii. No evidence of EIS contribution was made.*
- iv. The number of rest day was indicated wrongly at the number of public holidays in the payslip.*

Mayang Bayumas Sdn Bhd:

- i. Employment contract which consists of terms and conditions such as type of wages, entitlement of annual*

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		<p><i>leave, medical leave, public holiday, notice period, reason for dismissal and etc was not available.</i></p> <p><u>Bukit Selarong Estate:</u> <i>Non-compliance of contractor for the workers (I/C No.: 930903-02-53XX, 651122-02-58XX and 770623-02-61XX) as below:</i> <u>Zaitunizan Binti Mahmud Husin:</u></p> <ul style="list-style-type: none"> <i>i. The EPF contribution stated in the employment contract was incorrect where it stated 11% for employer. As to now, the employer should contribute 13% for salary less than RM 5,000.</i> <i>ii. EPF and SOCSO contribution made was incorrect where it made based on RM 1,100 wages where the actual wages of the workers are RM 1,200.</i> <i>iii. The deduction of EPF and SOCSO from the salary of workers are incorrect. As informed by the contractor, they deducted based on the request of workers but not the legal requirements.</i> <i>iv. Overtime limit has exceeded the allowable limit of 104 hours per month in accordance to Employment Act 1955.</i> <p><i>Thus, a minor non-conformance was raised.</i></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>All Operating Unit in SOU 1 have listed and maintained all contracted parties and documented in the List of Stakeholders as part of their stakeholders including internal stakeholders such as employee’s representatives and workers union, and external stakeholders such as FFB suppliers, contractors, suppliers, transporters and government department.</p> <p>The Vendor Integrity Pledge contains clauses disallowing child, forced and trafficked labour to be used by the contracted parties. All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with para:</p>	Complied

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		<ul style="list-style-type: none"> - a (i); Vendor Code of Business Conduct (VCOBC) - a (ii); all applicable laws and regulations related anti-bribery, fraud, and corruption. <p>Sighted the sampled contractors acknowledged Vendor Integrity Pledges (VIP) as below:</p> <p><u>Sungai Dingin POM</u></p> <ol style="list-style-type: none"> 1. LKS (M) Sdn Bhd (Reg Number: 470134 – U) 2. Lotus City Bearings (M) Sdn Bhd (Reg Number: 496918M) 3. Ultra Engineering Service (Reg Number: PG – 007 8389-X) <p><u>Sungai Dingin Estate</u></p> <ol style="list-style-type: none"> 1. Ban Guan (Reg Number: 000149823-W) – Date: 16/04/2021 2. Teong Huat Tyre Rethreading – Date: 19/04/2021 <p><u>Anak Kulim Estate</u></p> <ol style="list-style-type: none"> 1. AMZ Gemilang Enterprise (Company Number: RA0026093-T); Signed on 18/01/2019 2. Mayang Bayumas Sdn Bhd (Company Number: 700973-M) 3. Kedai Tayar dan Bateri Julong (Company Number: PG 0053696-U) signed on 19/02/2021 <p><u>Bukit Selarong Estate</u></p> <ol style="list-style-type: none"> 1. HHL Enterprise Sdn Bhd (Company Number: 738990-V) 2. Panraja A/L Sinnathamby (Company Number: AS 0174987-U) 	
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 	<p>Sungai Dingin POM receives RSPO Certified FFB from the 7 estates within the SOU 1 Certification Unit and from Genting Plantations (Bukit Sembilan Estate). The mill also received certified crop diverted from its sister certification unit SOU 2 estates. The mill also</p>	Complied

	<ul style="list-style-type: none"> Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license <p>- Critical (Major) compliance -</p>	receives non-certified FFB from 6 out-growers and 2 collection centres. The mill has all required information for all the suppliers, and it was available for verification.	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	There were 5 indirectly sourced FFB and the mill is in the process of collecting the info described in 2.3.1.	Complied
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Sungai Dingin POM has established a forecast business plan for five financial years from FY 2021 until 2025 categorized as the 'MPLAN_2021' as a projection for the mill to run the operations. The Plan is reviewed on an annual basis. The plan covers the Mill Production (Mill Intake – Oil Palm, Production Crude Palm Oil, Production Palm Kernel, Total Palm Oil Extraction & Total Palm Kernel Extraction), Reception, Fruit Handling, Sterilization, Threshing, Pressing, Clarification, etc.</p> <p>The Supply Base Estates have established and implemented its commitment to long-term sustainability and improvements through the MPLAN_2021 (Ex-estate Cost, Admin Paid by HQ and Depreciation). The MPlan Forecast projects the Crop – Oil Palm, CPO, PK, OER, KER, YPH, Direct Cost and Fixed Cost.</p>	Complied
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	SOU 1 Supply Bases have established a long-range replanting programme until FY 2025. Replanting are planned for the fields older than 25 years, non-performance fields (yield) and Ganoderma	Complied

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		<p>infected palms. The total Ha for the projected replanting of the 3 sampled estates are as follows:</p> <table border="1" data-bbox="1137 427 1912 737"> <thead> <tr> <th>Year</th> <th>Sungai Dingin Estate</th> <th>Anak Kulim Estate</th> <th>Bukit Selarong Estate</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>134.13</td> <td>207.51</td> <td>353.88</td> </tr> <tr> <td>2023</td> <td>206.04</td> <td>62.32</td> <td>318.20</td> </tr> <tr> <td>2024</td> <td>214.86</td> <td>-</td> <td>357.26</td> </tr> <tr> <td>2025</td> <td>264.51</td> <td>-</td> <td>324.21</td> </tr> <tr> <td>2026</td> <td>295.56</td> <td>-</td> <td>252.90</td> </tr> </tbody> </table>	Year	Sungai Dingin Estate	Anak Kulim Estate	Bukit Selarong Estate	2022	134.13	207.51	353.88	2023	206.04	62.32	318.20	2024	214.86	-	357.26	2025	264.51	-	324.21	2026	295.56	-	252.90	
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3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -</p>	<p>SOU 1 Sungai Dingin held management reviews at their respective sites on a yearly basis. Among the matters discussed during the management review are as follows:</p> <ol style="list-style-type: none"> 1. Results of Internal Audit 2. Customer Feedback 3. Status of preventive and corrective action plans 4. Follow Up actions for management reviews 5. Changes that could affect the management system 6. Recommendations for improvement <p>The minutes of meeting indicated that Internal audit findings were each thoroughly examined, and the corrective action plan were discussed. The management review was conducted at the respective operating units as follows:</p> <ol style="list-style-type: none"> i. Sungai Dingin POM: 13/04/2021 ii. Sungai Dingin Estate: 13/03/2021 iii. Bukit Selarong Estate: 18/03/2021 iv. Anak Kulim Estate: 25/03/2021 	Complied																								

Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.		
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The continual improvement plans were established. The documents were being maintained and updated with the assistance and guide from Sustainability Department. SDPB is committed to utilise the established system to regularly monitor and review their key activities at the mill and estates. Relevant action plans were initiated to continuously improve its key areas of operations, environmental, safety, health and welfare of the workers as well as social contribution to the community. Among others the continual improvement plans reviewed were:</p> <ul style="list-style-type: none"> a) Pollution Prevention Plan – 2021. b) Identification and Management of Wastewater – 2021. c) Waste Management Plan – 2021. d) Environmental Improvement Plan - 2021. e) Water reduction Plan - 2021. f) Safety and Health Program - 2021 <p>In SOU 1 Sg. Dingin the yield performance, extraction ratios and production costs have always been in utmost priority in ensuring long-term economic and financial viability. In general, various efforts had been made to optimize the yield of the plantation among others:</p> <ul style="list-style-type: none"> a) maximizing crop recovery, optimum ripeness b) standard (harvest ripe bunches only and 100% loose fruit collection), c) the soil fertility was maintained and planting only high yielding planting material. d) To mechanize operation where feasible to reduce reliance of labour.
		Complied

<p>3.2.2</p>	<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: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. 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. - Minor Compliance -</p>	<p>There was no submission made by Sime Darby of RSPO metrics template of current pending its availability by RSPO secretariat. The latest submission of Annual Communications Of Progress (ACOP) made for year 2018 is available as in RSPO website link as following: https://www.rspo.org/view-acop-pdf/oil-palmgrowers/Sime_Darby_Plantation_Berhad-ACOP2018.pdf. The ACOP 2020 submission was still pending at the time of remote audit as result of COVID 19 MCO adherence. The deferment made by RSPO Secretariat as in website link: https://www.rspo.org/news-and events/covid-19/important-update-regarding-acop-2019.</p>	<p>Complied</p>
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -</p>	<p>SOU 1 Sg. Dingin continued to use the documents established by the Sime Darby Plantation Bhd among others as follows:</p> <ul style="list-style-type: none"> a) Plantations / Mill Quality Management System (PQMS / MQMS) Manual b) PQMS / MQMS Std Operating Manual & Procedures (SOP) c) Sustainable Plantation Management System (SPMS) Manual d) RSPO Supply Chain Manual e) ESH Management System Manual f) Occupational Safety and Health Manual g) Pictorial Safety Standards h) Laboratory Process Control Manual i) Security Guidelines. <p>In addition, technical guidelines as listed in the Agricultural Reference Manual were also used. In general the documents included operation activities in the estates and the mills from:</p> <ul style="list-style-type: none"> a) seedlings in nursery to planting of young palms. 	<p>Complied</p>

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		<ul style="list-style-type: none"> b) plantation upkeep to mill FFB receipt, grading, processing. c) quality analysis and dispatch of CPO & PK. d) security in the SOU. <p>Contents of the Manual were disseminated to the workers through:</p> <ul style="list-style-type: none"> a) morning muster b) mill weekly briefings c) training as ad hoc and programmed basis. <p>The Manuals are also kept in the administration office to facilitate reference by any interested parties. Site inspection and interview with workers confirmed that the SOPs had been implemented and the employees understood the requirements of the SOPs.</p> <p>The mill processing system is documented in the Sustainability Plantation Management System MQMS/SQM/08 v 1 dated 01/11/2008 which includes the mill SOP, and Mill Quality Management Manual v.1 2008/MQMS/QMM/08. These documents provide guidelines and standards in the mill operations. The Standard Operating procedures (SOPs) described details from the</p> <ul style="list-style-type: none"> a) reception, sterilisation b) threshing, pressing c) clarification, nut polishing station d) effluent, laboratory e) workshop, dispatches <p>In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p> <p>The procedures were communicated to workers through training and infield supervision. Interview with workers showed that the information in the procedures had been effectively communicated. Site inspection and interview with workers confirmed that the SOPs</p>	
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		<p>had been implemented and they understood the requirements of the SOPs.</p>	
<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>Both the estates and the mill had an established mechanism to perform checking to ensure consistent implementation of procedures.</p> <p><u>Sg. Dingin Palm Oil Mill:</u></p> <ul style="list-style-type: none"> a) Daily Production Report (sighted 31/12/2020) providing details as follows: <ul style="list-style-type: none"> - FFB received / processed / balance - FFB certified non-certified quantity - Produce production / despatch / balance - Storage capacity/ status / laboratory results b) Unscheduled General Manager – Processing min twice monthly. c) Monthly visit by electrical engineer (TKE & Associate) license with recent on 16/04/2021- result from electrical installation was satisfactory. d) Internal audit has carried on 16/02/2021 for inspect compliance on ISCC/MSPO/RSPO standard requirement. Results from assessment 01/01/2021 were sighted. The results were presented in the Management Review held on 13/04/2021 were satisfactory and CU has established the proper and maintain the record of request documentation. e) Regulatory Body Visit <ul style="list-style-type: none"> - DOSH machinery inspection dated 12/04/2021 - DOE visit on 22/02/2021 for enforcement visit <p><u>Sg. Dingin Estate/ Anak Kulim Estate/ Bukit Selarong Estate Operations</u></p>	<p>Complied</p>

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		<p>The monitoring of the SOP implementation are made by the all levels of the supervisory personnel with records maintained and checked. Among others the records maintained are:</p> <ul style="list-style-type: none"> a) Daily production/work records for the core activities at the estates b) field cost book / chemical consumption record c) mature/immature field work program <ul style="list-style-type: none"> - fertilizer application - herbicide spraying, / rat baiting - Harvesting and collection of FFB <p>All the above records were kept for a minimum period of 12 months. In addition the management adopted the following check and balances though visit of the following dept /superiors:</p> <ul style="list-style-type: none"> a) Agronomic advisory report and fertilizer recommendation minimum 1x/year to monitor matters relating to: <ul style="list-style-type: none"> - nutrient deficiency, fertilizer program - pest & disease ganoderma infection, rat and RB attack - EFB mulching program for the year b) Plantation Advisory visit producing "Estate Visit Report" at frequency of 2x/year performing assessment relating to; <ul style="list-style-type: none"> - land use, capital expenditure, general charges - oil palm (mature & immature area) field condition - crop performance and cost - vehicles & equipment, amenities - labour and security - Replanting activities at PR21A - Bukit Selarong Estate - Replanting activities by Contractors are monitored to ensure compliance against the SDP and industry standards <p>Internal audit by the Agronomy Dept (Sustainability Unit) scheduled 2x/year for each unit. The exercise is to inspect and</p>	
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		<p>monitor compliance on ISCC/MSPO/RSPO standard requirement. Results from assessment of which are tabled and discussed during the Management Review.</p> <p>The mechanisms as established have been implemented. This is verified via the records maintained in all units daily, monthly and annually. Estate are monitored to ensure compliance against the SOP standard and factors relating to ESH.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>The implementation of SOPs are monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance. The estates among others maintained the following records:</p> <ul style="list-style-type: none"> a) work program/ Field cost books b) bin cards, Harvesting Intervals c) Monthly Estate Report and Account d) Monthly Operations, monthly rainfall e) pest and diseases monthly return f) agrochemical monthly consumption g) harvesting details i.e. daily inspection report - yield improvement program h) summary of machinery running hours i) harvesting records detailing the number of bunches harvested j) quantity of loose fruit collected by each harvesters k) Monthly FFB production <p>Similarly the mill, the monitoring records maintained among others were related to:</p> <ul style="list-style-type: none"> a) monitoring of effluent/ black smoke b) Processing & produce parameters 	Complied

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		<ul style="list-style-type: none"> c) Dispatches/ scheduled wastes d) monitoring consistent implementation of procedures through internal audit e) daily shift report for the process performance f) There was a flow chart showing method for monitoring compliance of requirements including legal requirements g) Internal audits are performed once a year minimum <p>Activities carried out by contractors are being monitored via the following among others:</p> <ul style="list-style-type: none"> a) to obtain work permit for confined spaces or work at height in the Mill b) evidences of competency for specialized work/ job c) The mill supervisors and engineers will be onsite to monitor the work d) The estates monitor to ensure that no contractors bring along their family members to work in the field e) The estates ensure that the contractors are providing PPE, suitable working equipment and machinery <p>Records of follow up action, if any, are retained where necessary.</p>	
<p>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.</p>			

<p>3.4.1</p>	<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. - Critical (Major) compliance -</p>	<p>There are no new plantings or operations within SOU 1 Sg. Dingin. However there were plans and impact assessments relating to environmental impacts based on documents as following:</p> <ul style="list-style-type: none"> a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009 b) Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI c) Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE. <p>There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered.</p> <p>The mill and estates has continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and assistant managers of mill and estates were identified as person-in-charge.</p> <p>Programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were made annually if there's no any new activity within respective sites.</p> <table border="1" data-bbox="1153 1236 1915 1364"> <thead> <tr> <th>Date</th> <th>Activities</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td colspan="3">Sg. Dingin POM</td> </tr> <tr> <td>2022</td> <td>Aquastic Cleaner</td> <td>Improvement in enhanced pollution control in boiler station</td> </tr> </tbody> </table>	Date	Activities	Description	Sg. Dingin POM			2022	Aquastic Cleaner	Improvement in enhanced pollution control in boiler station	<p>Complied</p>
Date	Activities	Description										
Sg. Dingin POM												
2022	Aquastic Cleaner	Improvement in enhanced pollution control in boiler station										

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		Dust emission within limits. 200K.	
Sg Dingin Estate			
2021	ESH	Additional RM1K ventilation at chemical store	
2021	ESH	Upgrade septic tank RM170K	
2022	Operation	Mechanized spraying	
Bukit Selarong Estate			
2021	Housing	Roofing Zinc to replace asbestos	
2021	Housing	Ceiling and wiring replacement	
2022	Housing	Fan installation	
2021	Operation	Mechanised P & D spraying	
Anak Kulim Estate			
2021	Operation	Mechanized spraying	
2022	Operation	Expansion area of MTG	
2021	Housing	Roofing Zinc to replace asbestos	
<p>SIA was conducted on 23/02 – 05/03/2015 for SOU 1 Sungai Dingin which inclusive of Sungai Dingin POM, Sungai Dingin Estate, Padang Buluh Estate, Bukit Hijau Estate, Holyrood Estate, Jentayu Estate, Bukit Selarong Estate, Anak Kulim Estate and Somme Estate by Social & Environment Projects Unit, PSQM Department. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly.</p>			

<p>3.4.2</p>	<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>SOU 1 Sg. Dingin has separate Social Impact Assessment (SIA) and Environmental Impact Assessment reports. It mentioned the objectives, category, action, frequency, person in charge and monitoring period.</p> <p>Among others as summarized below:</p> <ul style="list-style-type: none"> a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor’s workers and to maintain housing and facilities provided to workers). based on inputs received from external stakeholders during stakeholder meetings, union meetings, JCC meetings, and Gender Committee b) To contribute to local communities development based on inputs received from external stakeholders during stakeholder meetings, union meetings, JCC meetings, and Gender Committee meetings. <p>Social management plan was developed in Sg. Dingin POM on 30/03/2021, 03/01/2021 in Sg. Dingin Estate, 01/04/2021 in Anak Kulim Estate and 04/04/2021 in Bukit Selarong Estate. The management plan was developed after collected the feedbacks and issues during various of meeting such as stakeholder meeting, union meeting and gender committee meeting. Issues raised such as below:</p> <ul style="list-style-type: none"> 1. Area of concern: Briefing of calculation of wages to be conducted in detail to all the workers as reported in NUPW meeting. 	<p>Complied</p>
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		<p>Action taken: The mill management has conducted briefing on 13/03/2021 and 27/03/2021 to all workers regarding the payslip calculation. Seen the training records and interviewed with NUPW representative and workers confirmed that the management has explained to them on the calculation of wages.</p> <p>2. Area of concern: Insufficient water at female toilet as reported in Gender Committee meeting.</p> <p>Action taken: The mill management has repaired the water piping at the female toilet on 21/01/2021 and seen the photo evident of repair work done. Interviewed with the Chairman of Gender Committee confirmed that the issue was resolved.</p> <p>3. Area of concern: Broken culvert and road condition.</p> <p>Action taken: The estate management has carried out inspection and purchased culvert to repair by own workers. Seen the Purchase Order#4502580776 dated 02/11/2020, 4502544184 dated 17/08/2020 and 4502526521 dated 08/07/2020 of culverts and the photo evident of the repair work done. Interviewed with the NUPW representative who reported the issue found that this issue was resolved.</p> <p>4. Area of concern: Engagement of parole program by the company to curb labour shortage issue.</p> <p>Action taken: The estate management has briefed to the OSH & NUPW committee during the meeting on 19/03/2021. Besides, briefing to all workers during morning muster was conducted on 10/02/2021 prior the recruitment of parolees. Interviewed with the workers</p>	
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		<p>confirmed that the management has briefed on the program to them during morning muster.</p>																
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The Social/ Environmental Action Plan available for each units were available having information i.e issues, management plan, PIC and time frame. The input are gathered from the meeting minutes:</p> <ul style="list-style-type: none"> a) Gender Committee, NUPW b) Safety Meeting c) Complaint & Request from internal & external stakeholders and muster briefing) d) Stakeholders meeting <table border="1" data-bbox="1173 724 1834 1150"> <thead> <tr> <th>OU</th> <th>Review date</th> <th>Updates</th> </tr> </thead> <tbody> <tr> <td>Sg. Dingin POM</td> <td>01/01/2021</td> <td>No changes - no new activities</td> </tr> <tr> <td>Sg. Dingin Estate</td> <td>15/03/2021</td> <td>Changes to include revised EQA Noise Exposure Regulation 2019</td> </tr> <tr> <td>Anak Kulim Estate</td> <td>02/01/2021</td> <td>No changes - no new activities</td> </tr> <tr> <td>Bukit Selarong Estate</td> <td>03/01/2021</td> <td>Newly mechanised P&D spraying</td> </tr> </tbody> </table> <p>The social management plan was implemented, reviewed and updated on yearly basis in the participatory way by collected feedbacks during meeting with internal and external stakeholders. Seen the Social Management Plan 2020 in mill and estates where the issues captured in the stakeholder meeting, gender meeting</p>	OU	Review date	Updates	Sg. Dingin POM	01/01/2021	No changes - no new activities	Sg. Dingin Estate	15/03/2021	Changes to include revised EQA Noise Exposure Regulation 2019	Anak Kulim Estate	02/01/2021	No changes - no new activities	Bukit Selarong Estate	03/01/2021	Newly mechanised P&D spraying	<p>Complied</p>
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		<p>and NUPW meeting were included. Reviewed the area of concerns for Social Management Plan 2020 as below:</p> <ol style="list-style-type: none"> 1. Area of concern: To ensure no water interruption at mill quarters. Action taken: The management installed automatic pumping system on March 2020. So far, no complaints received from workers. Seen the photo evident of the water pump installed. 2. Area of concern: NUPW representative informed that workers do not understand the increment of salary to RM 1,200. Action taken: The management has briefed the workers during morning muster on 20/02/2020 and seen the briefing record. Interviewed with the NUPW representative confirmed that the management has briefed accordingly. 	
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -</p>	<p>The Human Resource Department in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016) to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.</p>	<p>Complied</p>
<p>3.5.2</p>	<p>Employment procedures are implemented, and records are maintained. - Minor Compliance -</p>	<p>Application form, interview assessment form, medical check-up report, photocopied of identification card and employment contract was sighted for new recruited employees. The latest recruitment of workers in Sg. Dingin POM and Sg. Dingin Estate was on March 2021. Interviewed with the Assistant Manager and Clerk confirmed</p>	<p>Complied</p>

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		<p>that if there is any job vacancy available, they will publish a job vacancy banner at the junction to enter the mill and estate. Seen the job vacancy notice for Processing Operator and Harvester & Pruner. Besides, the management also posted the vacancy in WhatsApp group with the workers and during morning muster. Bukit Selarong Estate has employed parolee as this is the engagement between Sime Darby and the government. The personal file and employment contracts for parole labour was sighted.</p>	
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -</p>	<p>All operations were risk assessed to identify all Health and Safety issues. Mitigation plans, and procedures were available, documented and implemented as below: Sungai Dingin POM</p> <ol style="list-style-type: none"> 1. The mill assessed all risks, hazards and identified Health and Safety issues through the implementation of HIRARC as per Sime Darby Plantations HIRARC Procedure (Reference Number: 5.4.1a; Issue date: 25/05/2015). Risks assessments were based on likelihood and severity matrix. HIRARC review were done on 08/01/2021 for all operations in the mill. Mitigation plans were documented as Exiting Control and Recommended Risk Control in the HIRARC register. 2. Chemical health Risk Assessments were conducted to identify the risks associated to the chemicals used in the mill. The CHRA was conducted by Gatconst Sdn Bhd Assessor (Dosh Ref Number: HQ/09/ASS/00/124) on 16/10/2020. The CHRA Report (Report Number: HQ/09/ASS/00/124 – 2020/0058) was available for verification. 3. Noise Risk Assessment was conducted at Sungai Dingin POM by SH Safety Consultancy Sdn Bhd (DOSH Registration No: KD/04/01/231) on 11th March 2020. The Noise Risk 	<p>Complied</p>

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		<p>Assessment report was conducted during normal operation activities, which was carried out in compliance with Occupational Safety and Health (Noise Exposure) Regulation 2019.</p> <ol style="list-style-type: none"> 4. Audiometric Test was conducted by Klinik Perubatan Mutiara (JKKP PUA 04/18) in July 2020 for a total of 8 workers from the mill deemed to be exposed to excessive noise above the standard threshold level. The results indicated that all the workers showed normal hearing results. They are to undergo annual audiometry test as per the recommendation stated in the report (Report Number: AUD/LDGSGDINGIN/7/2020). For the year 2021 the workers have been referred for medical test on 12/04/2021 and 19/04/2021 awaiting the results. 5. Medical Surveillance was conducted as per CHRA for 18 workers exposed to organophosphate and manganese in the mill on 13/07/2020. The OHD has certified that the examined workers are all fit for work which may expose them to organophosphate and manganese. For the year 2021, 17 workers have been sent for medical surveillance on 27/03/2021 and the results have not been received as of to date. <p>Sungai Dingin Estate</p> <ol style="list-style-type: none"> 1. The estate assessed all risks, hazards and identified Health and Safety issues through the implementation of HIRARC. Verified the HIRARC register to be reviewed on 05/02/2021 due to an accident that occurred on 02/02/2021 involving the harvesting operation. 2. Chemical Health Risk Assessments were conducted to identify the risks associated to the chemicals used in the estate. The CHRA was conducted by Gatconst Sdn Bhd Assessor (Dosh Ref Number: HQ/09/ASS/00/124) on 06/10/2020. The CHRA 	
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		<p>Report (Report Number: HQ/09/ASS/00/124 – 2020/0050) was available for verification.</p> <ol style="list-style-type: none"> 3. Noise Risk Assessment Report was available in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019. The monitoring was done on 09/03/2020 by a Noise Risk Assessor (HQ/18/PEB/00/00021) – SH Safety Consultancy Sdn Bhd. 4. Audiometric Test was conducted by Eurofins NM laboratory Sdn Bhd on 15/02/2021. The Audiometric Report (Report Number: AUDIO/21-02/009) was available for verification. The report indicated that there were no workers with Standard Threshold Shift. <p><u>Anak Kulim Estate</u></p> <ol style="list-style-type: none"> 1. The estate assessed all risks, hazards and identified Health and Safety issues through the implementation of HIRARC. Verified the HIRARC register to be reviewed on 11/08/2020 for the replanting operation due to an accident that occurred on 06.08.2020 in the related operation. 2. Chemical Health Risk Assessments were conducted to identify the risks associated to the chemicals used in the estate. The CHRA was conducted by Gatconst Sdn Bhd Assessor (Dosh Ref Number: HQ/09/ASS/00/124) on 07/10/2020. The CHRA Report (Report Number: HQ/09/ASS/00/124 – 2020/0051) was available for verification. 3. Noise Risk Assessment Report was available in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019. The monitoring was done on 12/03/2020 by a Noise Risk Assessor (HQ/18/PEB/00/00021) – SH Safety Consultancy Sdn Bhd. <p><u>Bukit Selarong Estate</u></p>	
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		<ol style="list-style-type: none"> 1. The estate assessed all risks, hazards and identified Health and Safety issues through the implementation of HIRARC. Verified the HIRARC register to be reviewed on 01/01/2021 for all operations. 2. Chemical Health Risk Assessments were conducted to identify the risks associated to the chemicals used in the estate. The CHRA was conducted by Gatconst Sdn Bhd Assessor (Dosh Ref Number: HQ/09/ASS/00/124) on 21/10/2020. The CHRA Report (Report Number: HQ/09/ASS/00/124 – 2020/0055) was available for verification. 3. Noise Risk Assessment Report was available in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019. The monitoring was done on 9 - 10/03/2020 by a Noise Risk Assessor (HQ/18/PEB/00/00021) – SH Safety Consultancy Sdn Bhd. 4. Audiometric Test was conducted by Eurofins NM laboratory Sdn Bhd on 22 - 24/02/2021. The Audiometric Report (Report Number: AUDIO/21-02/010) was available for verification. The report indicated that there were no workers with Standard Threshold Shift. 	
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>The effectiveness of the HIRARC is monitored and ensured through checklist and trainings that were conducted by SOU 1 Sungai Dingin POM and its estate in each of the operations. Site visits around the mill and estate indicated the control measures as per HIRARC were followed and ensured by the respective management units</p>	Complied
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</p>	<p>A training programme has been developed and available in the Training Requirement for Operating Units (Mills & Estate). The trainings were sighted to have included Gender Specific Training and involves staffs and workers.</p>	Complied

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	<p>aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Covid-19 training and briefings were sighted at the mill and estates. Interview with the workers and staff indicated that they were aware on the SOP during the RMCO such as social distancing, regular sanitization and use of PPE (Face Mask).</p>																							
<p>3.7.2</p>	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>All planned training activities implemented either as a whole SOU 1 group or by individual operating units were maintained its records as per samples sighted as following:</p> <p>Covid-19 training and briefings were sighted at the mill and estates. Interview with the workers and staff indicated that they were aware on the SOP during the RMCO such as social distancing, regular sanitization and use of PPE (Face Mask).</p> <p>Records of trainings were maintained by the mill and estates as below:</p> <p>Sungai Dingin POM</p> <table border="1" data-bbox="1151 911 1926 1182"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Hearing Conservation Training</td> <td>28/12/2020</td> </tr> <tr> <td>Weighbridge, E-Lab & CRS Training</td> <td>16/12/2020</td> </tr> <tr> <td>FICO/MM Refresher Training</td> <td>17/12/2020</td> </tr> <tr> <td>Plant Maintenance Refresher Training</td> <td>16/12/2020</td> </tr> <tr> <td>Workshop SOP Training</td> <td>15/10/2020</td> </tr> <tr> <td>Boiler SOP Training</td> <td>16/10/2020</td> </tr> <tr> <td>Covid-19 Guideline Training</td> <td>01/09/2020</td> </tr> </tbody> </table> <p>Sungai Dingin Estate</p> <table border="1" data-bbox="1151 1246 1926 1375"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Passport Handover Briefing</td> <td>12/01/2021</td> </tr> <tr> <td>Drone handling, Maintenance & Preventive Training</td> <td>25/01/2021</td> </tr> </tbody> </table>	Training	Date	Hearing Conservation Training	28/12/2020	Weighbridge, E-Lab & CRS Training	16/12/2020	FICO/MM Refresher Training	17/12/2020	Plant Maintenance Refresher Training	16/12/2020	Workshop SOP Training	15/10/2020	Boiler SOP Training	16/10/2020	Covid-19 Guideline Training	01/09/2020	Training	Date	Passport Handover Briefing	12/01/2021	Drone handling, Maintenance & Preventive Training	25/01/2021	<p>OFI</p>
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Scheduled Waste Management Training	12/03/2021
Nursery Refresher Training	16/12/2020
Hearing Conservation & PPE Training	14/12/2020
Tractor Driver Competency SOP Driving Training	28/11/2020

Anak Kulim Estate

Training	Date
Scheduled Waste Management Training	12/04/2021
Human Rights Training	25/03/2021
Harvesting Training	15/01/2021
MyCrop Spraying Training	19/01/2021
Manuring and Calibration Training	22/09/2020
Covid-19 Guidelines Briefing	07/04/2020

Bukit Selarong Estate

Training	Date
Training on SDPB HSE Policies	10/02/2021
Scheduled Waste Training	08/03/2021
Briefing on Passport Safekeeping	15/01/2021
COBC and Whistleblowing Policy Training	27/10/2020
Harvesting Techniques Training	22/11/2020
Manual Manuring Application Training	05/11/2020

Training on the GHG submission could be escalated to the person in charge in the mill.

Thus, an OFI was raised.

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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Sungai Dingin POM has conducted a SCCS SOP & Policy Training for the Management Staffs, Office Operator, Auxiliary Police (AP) and Weighbridge Operators on 04/02/2021. The training was conducted based on the RSPO SCCS requirements and procedures. Records of training were available for verification.</p>	Complied
<p>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)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Sg. Dingin POM receives RSPO Certified FFB from certified sources and third parties' crops. The mill is certified with Mass Balance modules and thus, this is not applicable.</p>	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The mill is declared to be Mass Balance module because the mill received FFB from certified sources and non-certified third parties' crop. As per the Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability, Version 2 dated April 2019, Sg. Dingin POM is certified under Mass Balance module.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill was provided by the certification unit and recorded in this public summary report.</p>	Complied

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	the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.																																		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO Supply Chain managing organization (RSPO IT platform or book and claim). Seen the Member ID: RSPO_PO1000000104 and license valid until 11/08/2025.</p> <p>Total 7 sales of certified product (CSPO and CSPK) were registered in the RSPO PalmTrace from July 2020 to March 2021, sampled the transaction ID and details as below:</p> <table border="1" data-bbox="1151 791 1930 1145"> <thead> <tr> <th>Transaction ID</th> <th>Date</th> <th>Volume</th> <th>Product</th> </tr> </thead> <tbody> <tr> <td>TR-1552c59b-6a53</td> <td>28/11/2020</td> <td>500mt</td> <td>CSPO</td> </tr> <tr> <td>TR-e4a9a416-184a</td> <td>31/12/2020</td> <td>118.99mt</td> <td>CSPO</td> </tr> <tr> <td>TR-6a6b3ca7a-ea2a</td> <td>22/12/2020</td> <td>200mt</td> <td>CSPK</td> </tr> <tr> <td>TR-ef7f2c72-1f35</td> <td>27/01/2021</td> <td>200mt</td> <td>CSPK</td> </tr> <tr> <td>TR-1552c59b-6a53</td> <td>03/02/2021</td> <td>200.24mt</td> <td>CSPO</td> </tr> <tr> <td>TR-a62176da-f4bb</td> <td>03/02/2021</td> <td>219.80mt</td> <td>CSPK</td> </tr> <tr> <td>TR-371d0187-3e3b</td> <td>04/02/2021</td> <td>198.63mt</td> <td>CSPO</td> </tr> </tbody> </table>	Transaction ID	Date	Volume	Product	TR-1552c59b-6a53	28/11/2020	500mt	CSPO	TR-e4a9a416-184a	31/12/2020	118.99mt	CSPO	TR-6a6b3ca7a-ea2a	22/12/2020	200mt	CSPK	TR-ef7f2c72-1f35	27/01/2021	200mt	CSPK	TR-1552c59b-6a53	03/02/2021	200.24mt	CSPO	TR-a62176da-f4bb	03/02/2021	219.80mt	CSPK	TR-371d0187-3e3b	04/02/2021	198.63mt	CSPO	Complied
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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>	Sime Darby Plantation has developed Plantation Quality Management System – Sustainable Plantation Management System, Appendix 15, Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability, Version 2 dated April 2019.	Complied																																

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	<ul style="list-style-type: none"> b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>The procedure was established which covers responsibility, reporting of certified CPO/PK, non-conforming products and/ or documents, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, record keeping, training, complaints, management review and product claim.</p> <p>The mill has conducted SCCS SOP & Policy training to the critical control point personnel such as weighbridge operator, auxiliary police, drivers, clerks and QA supervisor on 04/02/2021 and 05/02/2021. Seen the training attendance list.</p> <p>The Mill Manager as Head of Operating Unit have the overall responsibility for the implementation of SOP and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Mill Manager has appointed Assistant Manager as person in charge for Environmental/ Quality Management Systems inclusive of SCCS and appointment letter dated 01/11/2020 was sighted.</p>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. 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 	<p>Internal audit conducted based on the Sustainable Plantation Management System, Appendix 15, Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability, Version 2 dated April 2019. Internal Audit Procedure, Doc. No.: SD/SDP/PSQM/IAP, Rev. 2 dated 01/11/2017 was established where the internal audit shall be conducted at least once a year.</p> <p>The latest Internal Audit for MSPO & RSPO SCCS was conducted by GSD Malaysia & Northern RSQM on 25/02/2021. There was 1 major non-conformance raised. Root cause and corrective action was identified. The non-conformance was closed on 01/03/2021 and verified by the auditor. Seen the evidence of closure of the non-conformance.</p>	Complied

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	<p>review at least annually. The mill shall maintain the internal audit records and reports.</p>		
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>The daily records are prepared at the entry point at the weighbridge. When FFB is delivered to the mill from the estates, the transporters present the Delivery Order (DO) to the mill weighbridge clerk for the FFB to be received by the mill. The mill weighbridge clerk then checks on the Certified Status of the incoming FFB (RSPO Number & RSPO License Validity Period). Daily summary and monthly summary were documented for all the incoming certified FFB.</p> <p>The mill received FFB from sister estates and purchased from outside FFB suppliers. The records of FFB received was recorded in FFB delivery/consignment note, FFB weighbridge ticket and summarize in the Mass Balance sheet.</p> <p>The management will inform CB if there are any overproduction of certified tonnage. They are aware on the overproduction as per stated in the procedure. Based on last review period, no overproduction recorded.</p> <p>Addressed in the SOP clause 11.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: IP to MB to conventional.</p> <p>Material received with insufficient information shall be treated as non-conforming documents. The documents shall be investigated, verified, and corrected to allow processing of material. Authorization for release shall be by the mill manager.</p>	<p>Complied</p>

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		<p>E.g. of information available in the mill’s weighbridge tickets are as follows:</p> <ul style="list-style-type: none"> a) FFB Supplier: Bukit Selarong Estate (RSPO Certified) <ul style="list-style-type: none"> - Date: 01.01.2021 - Product: FFB A Crop - Delivery Ticket Number: 17721 - RSPO Cert No: SPO 550179 - Vehicle Number: PJN6238-BSE19 - Tonnage: 11.310 Mt b) FFB Supplier: GBSE – Genting Bukit Sembilan Estate (RSPO Certified) <ul style="list-style-type: none"> - Date: 14.12.2020 - Product: FFB - Delivery Ticket Number: FFB20001020W - Vehicle Number: JPE6189A - Tonnage: 16,470 kg - RSPO Cert Number: RSPO 673953 	
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; 	<p>Sungai Dingin POM ensured the required information is available in document form. Verified the sampled Dispatch Delivery Notes as follows:</p> <ul style="list-style-type: none"> 1. Sales of CPO as RSPO Certified Product <ul style="list-style-type: none"> a) The name and address of the buyer: XXX b) The name and address of the seller: <ul style="list-style-type: none"> - Sime Darby Plantation Berhad, KKS Sg. Dingin, P.O Box 202, 09700 Karangan, Kedah Darul Aman. c) Shipment / delivery date: 02/02/2021 d) The date on which the documents were issued: 02/02/2021 e) RSPO certificate number: RSPO 550179 f) A description of the product, including the applicable supply chain model: Crude Palm Oil (CPO) – RSPO MB 	Complied

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	<ul style="list-style-type: none"> e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> g) The quantity of the products delivered: 40,160 kg h) Any related transport documentation: <ul style="list-style-type: none"> - Collection Order (G 06289), Despatch Meter Reading) a) A unique identification number: 025145 b) Contract Number: <ul style="list-style-type: none"> - S/C-PSD/2102/CPO0093; Order Quantity: 200.00; Tank Number: 04; Balance: 159.840 mt. 2. Sales of Kernel as RSPO Certified Product <ul style="list-style-type: none"> a) The name and address of the buyer: XXX b) The name and address of the seller: <ul style="list-style-type: none"> - Sime Darby Plantation Berhad, KKS Sg. Dingin, P.O Box 202, 09700 Karangan, Kedah Darul Aman. c) The loading or shipment / delivery date: 02/02/2021 d) The date on which the documents were issued: 02/02/2021 e) RSPO certificate number: RSPO 550179 <ul style="list-style-type: none"> - A description of the product, including the applicable supply chain model: 0008 – Palm Kernel – RSPO MB f) The quantity of the products delivered: 38,910 kg g) Any related transport documentation: <ul style="list-style-type: none"> - Collection Order (PK) & Kernel Despatch Inspection. h) A unique identification number: 020362 i) Contract Number: <ul style="list-style-type: none"> S/C-PSD/2101/PK0134; Order Quantity 120 & Contract Number: S/C-PSD/2102/PK0110. 	
<p>3.8.9</p>	<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 	<p>There is no any outsourcing activity related to processing and storage except for transporter of CPO. Delivery of PK is arranged by the customers. Seen the Letter of Award (LOA) for the CPO transporter dated 12/12/2020 which valid until 31/10/2023. Requirements of RSPO was stated under Clause 5 (d) in the LOA. The contractor shall permit the Certification Bodies appointed by</p>	<p>Complied</p>

	<p>ii) The mill shall ensure the following:</p> <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. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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>the company to conduct audit on its or its sub-contractors' operations.</p>	
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>The mill has recorded the details of the contractors engaged by the mill in the stakeholder list.</p>	<p>Complied</p>
3.8.11	<p>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.</p>	<p>There were no new contractors used for the physical handling of RSPO certified products by the mill.</p>	<p>Complied</p>
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 	<ol style="list-style-type: none"> 1. Sime Darby has established Standard Operating Procedure to maintain all records of evidence on the implementation of RSPO SCCS. The SOP was documented in Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records. 2. As stated in SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 	<p>Complied</p>

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	<p>requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</p>	<p>5.0: Control of Documents and Records all traceability records should be maintained at minimum period of 3 years.</p> <p>3. Sungai Dingin POM receives and process both, certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system.</p> <p>4. Mass Balance Module</p> <ul style="list-style-type: none"> - Sungai Dingin POM has established the SCCS Mass balance sheet document to record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. - All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to conversion ratios of OER and KER as per sample records of Mill production report July 2020 – March 2021 and FFB summary 2020 – March 2021) - Positive stock deliveries maintained through the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. No short selling made by Sungai Dingin POM. 									
<p>3.8.13</p>	<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>Extraction rates were derived from actual production output that were measured daily by the mill and recorded in the daily production report. Actual rates for the period since last audit were available in the Mill production report July 2020 – March 2020. Volume estimates for next period were based on historical extractions and FFB projection from estates.</p> <p>Sampled the Daily Production Summary Report for Production Date 31/03/2021 as below:</p> <table border="1" data-bbox="1167 1299 1917 1382"> <thead> <tr> <th></th> <th>Today</th> <th>Month - Todate</th> <th>Year - Todate</th> </tr> </thead> <tbody> <tr> <td>OER</td> <td>20.28</td> <td>20.22</td> <td>20.51</td> </tr> </tbody> </table>		Today	Month - Todate	Year - Todate	OER	20.28	20.22	20.51	<p>Complied</p>
	Today	Month - Todate	Year - Todate								
OER	20.28	20.22	20.51								

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		KER	5.48	5.66	5.57	
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Extraction rates updated daily based on actual measurement of production output. Sampled the Daily Production Summary Report as stated in 3.8.13. Projected rates were based on historical extractions and FFB projection from estates.				Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Not applicable since Sg. Dingin POM receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system.				Not Applicable
3.8.16	Registration of Transactions 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. 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.	Based on the downloaded transactions register from the certification unit's Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly. Based on the announcement (transaction) summary, all the registrations were found to be in order as stated in indicator 3.8.4.				Complied
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	Sime Darby Plantation Berhad has obtained RSPO Trademark License with License Number: RSPo-1106024 valid until 10/07/2021 for supply chain model as per the Annex 1 to RSPO Trademark License. Sg. Dingin POM did not make any claims on products.				Complied
General corporate communications						
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Sime Darby Plantation Berhad has made "off-product" claim by highlighted its founding member of RSPO in				Complied

		https://www.simedarbyplantation.com/sustainability/programmes/responsible-agriculture-practices/sustainability-certification .	
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member’s history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.	Sime Darby Plantation Berhad has displayed its membership of RSPO and RSPO web address in the company’s website: https://www.simedarbyplantation.com/sustainability/programmes/responsible-agriculture-practices/sustainability-certification .	Complied
4.3	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 oil palm products.	Sime Darby Plantation Berhad does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Sime Darby Plantation Berhad ensure communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No RSPO corporate logo used as evidence during the document audit and site visit.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and sales contract to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the	The only business to business communication is through the delivery documents. There is no use of trademark logo. Only the	Complied

	supply chain model and certificate number under which the claim is being made.	communication with RSPO certification number and supply chain model sighted in the weighbridge tickets.	
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Not applicable as Sg. Dingin POM is not a distributor or wholesaler.	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	Not applicable to Sg. Dingin POM as they do not conduct business to consumer claims.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not applicable to Sg. Dingin POM as they do not conduct business to consumer claims.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not applicable to Sg. Dingin POM as they do not conduct business to consumer claims.	Not Applicable

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6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable to Sg. Dingin POM as they do not conduct business to consumer claims.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not applicable to Sg. Dingin POM as they do not conduct business to consumer claims.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	There was no use of RSPO Trademark logo used on product claim.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not applicable to Sg. Dingin POM as they do not conduct business to consumer claims.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules	Not applicable as Sg. Dingin POM do not fall under the category of retailers or food service companies.	Not Applicable

	applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Sg. Dingin POM is producing crude palm product and does not involved in any labelling of end product.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Sg. Dingin POM is producing crude palm product and does not involved in any labelling of end product.	Not Applicable
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm 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. The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). 	Sg. Dingin POM is producing crude palm product and does not involved in any labelling of end product.	Not Applicable

	<ul style="list-style-type: none"> In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. The volume of [oil palm 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. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>Sg. Dingin POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Not Applicable</p>
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(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>Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised on August 2020. They promote</p>	<p>Complied</p>

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	<p>- Critical (Major) compliance -</p>	<p>the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. Policy on the Protection of HRDs FINAL.pdf (sime-darbyplantation.com).</p> <p>The briefing of the policies was conducted on 04 – 12/05/2020 in Sg. Dingin POM, 27/02/2021, 01-03/03/2021 in Sg. Dingin Estate, 03/03/2021 in Anak Kulim Estate and 10/02/2021 in Bukit Selarong Estate. Besides, any new employed workers will be briefed during induction training.</p>	
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>Sime Darby Plantation prohibits any form of harassment in their operation as per the policies above. Interviewed with the workers confirmed that no harassment by the management.</p>	Complied
<p>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</p>			
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 whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistleblowers, complainants and community spokespersons play by lodging complaints in confidence.</p>	Complied

<p>4.2.2</p>	<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>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing. Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue. The "Suara Kami" has been displayed at the housing complex. The workers in Sg. Dingin POM were briefed on the complaint mechanism during Townhall Meeting conducted on 17/08/2020. The workers in Sg. Dingin Estate has been briefed by Region CEO on 27/02/2021, 01-03/03/2021 during morning muster on the complaint mechanism. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company.</p>	<p>Complied</p>
<p>4.2.3</p>	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Sg. Dingin POM, Sg. Dingin Estate, Anak Kulim Estate has implemented Complaint Book (Internal & External), Building Repair & Housing Defect Form and Records of Communication with Stakeholders, Workers and Contractors to record any complaints from internal and external stakeholders. Sampled of the complaints as below:</p> <ol style="list-style-type: none"> 1. House No.: WQ30A dated 27/01/2021 Issue: Missing of window glass. Status: The management has instructed the carpenter to replace the missing window glasses and seen the photo evident of the action taken. The complainant has acknowledged after action taken. 2. House No.: QB 20 dated 17/03/2021 	<p>Complied</p>

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		<p>Issue: Broken of ceiling and water tank. Status: The management has informed the contractor to carry out housing repair and seen the invoice# KS-21-INV-3004 dated 01/04/2021 for the House No.: QB 20 for water tank float repair and plaster ceiling with metal furring repair. The complainant has acknowledged after the repair work completed.</p> <p>3. House No.: C5 and E6 dated 07/03/2021 Issue: Broken ceiling. Status: The management has identified total number of 16 units of houses need for ceiling repair. Tendering process was conducted and finalized on 09/03/2021 to award to the contractor on this repair work. Seen the Tender Evaluation Report which approved by Region CEO on 15/03/2021. The repairing work is in progress and this has verified during linesite visit.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	Complied

Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>The estates' management have made contribution to the local communities based on the requests from the community. For eg: the neighbouring schools have requested soil for beautification in the school. The management has approved and supplied accordingly. This has been verified with the requester during stakeholder consultation. Besides, the school's representatives have informed that the management of Sg. Dingin Estate has made effort for cleaning up the school after flooded. Stakeholders from Anak Kulim Estate has informed that the management has made contribution to the school's community such as cleaning up the school compound and supplied soil to the school for beautification program.</p>	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	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Sg. Dingin POM is located on the land of Sg. Dingin Estate under Land Title# 57873, Lot No.: 332.</p> <p>There are total 17 land titles in Sg. Dingin Estate, 9 land titles in Anak Kulim Estate and 46 land titles in Bukit Selarong Estate. The estates able to show legal ownership on the use of land. The Land Management Department is in the progress of changing the name of owner to Sime Darby Plantation Berhad and the land use type from Rubber to Oil Palm in all estates. Seen the communication from the Land Management Department with the estate management last updated on 15/04/2021. This is expected to be completed February 2022.</p>	Complied
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities.</p>	Complied

		<p>Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</p>	
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</p>	Complied
4.4.2b	<p>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.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</p>	Complied

4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There is no land dispute recorded. Boundary stone was identified and marked in the GPS surveyed map. Trenches were available to demarcate the boundary and this has confirmed by interviewed with the community.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
<p>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.</p>			

4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	<p>Complied</p>
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	<p>Complied</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. - Minor compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	<p>Complied</p>
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	<p>Complied</p>
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>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	<p>Complied</p>

	environmental and social implications of the proposed operations on their lands. - Minor compliance -		
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied

4.6.2	<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>	SOP as per indicator 4.6.1.	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and</p>	SOP as per indicator 4.7.1.	Complied

	implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - 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 was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.	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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied

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4.8.4	<p>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).</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	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	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Current and previous FFB prices were available as per MPOB Daily FFB Reference Price Summary by Region (RM/Tonne); March 2021; Northern Region; 1% MPOB FFB Price. The daily price was displayed at the weighbridge for all suppliers to see.</p> <p>Nevertheless, no smallholders supplying to Sungai Dingin POM except for few out growers and traders including Tang Tatt, Tentu Mewah Sdn. Bhd., KD Felcra Malau and CK Teik Enterprise Sdn. Bhd.</p>	Complied
5.1.2	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>FFB Pricing explanation made normally through meeting with FFB suppliers of Sungai Dingin Palm Oil Mill. Verified the latest meeting with FFB Suppliers conducted on 14/04/2021.</p> <p>Nevertheless, no smallholders supplying to Sungai Dingin POM except for few out growers and traders including Tang Tatt, Tentu Mewah Sdn. Bhd., KD Felcra Malau and CK Teik Enterprise Sdn. Bhd.</p>	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Fair pricing calculated based on 1% MPOB FFB Price, awarded to suppliers as specified in individual agreements of FFB suppliers with the SDPB.</p> <p>Nevertheless, no smallholders supplying to Sungai Dingin POM except for few out growers and traders including Tang Tatt, Tentu Mewah Sdn. Bhd., KD Felcra Malau and CK Teik Enterprise Sdn. Bhd.</p>	Complied

5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>No smallholders under the SOU 1 Sungai Dingin, therefore this indicator is not applicable.</p>	<p>Not Applicable</p>
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contracts for FFB out growers and traders are fair, legal and transparent and have an agreed timeframe as per sample sighted as following:</p> <ol style="list-style-type: none"> 1. FFB Supplier: Koperasi Peserta-Peserta Rancangan Felcra Gugusan Sungai Malau Selama Berhad; Company Number. KOOP Kawasan No 430; Agreement Number: P/P/1220/FFB02590L; Effective Date: 01/01/2021. 2. FFB Supplier: Genting Plantations Berhad (Ladang Bukit Sembilan); Company Number: 197701003946; Agreement Number: P/P/1220/FFB02591L; Effective Date: 01/01/2021. 	<p>Complied</p>
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>Payments are made within 30 days, upon receipt of supplier's invoice and confirmation of the quantity of FFB delivered to the mill. Payment was made through the financial department at head office to the FFB Suppliers account.</p>	<p>Complied</p>
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>The Mill conducts regular calibration on their weighbridges used to determine the FFB tonnage for all FFB suppliers. There are 2 weighbridges used in the mill and records of yearly calibration for both weighbridges were available for verification as below:</p> <p>Weighbridge 1 – 60,000 Kg</p> <ul style="list-style-type: none"> - Weighbridge Serial Number: B602991422 - Certificate Number: B 1574384 - Safety Label Number: (2.1K) Q017927 	<p>Complied</p>

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		<ul style="list-style-type: none"> - Certificate Date: 03/06/2020 - Calibrator: Metrology Corporation Malaysia Sdn Bhd <p>Weighbridge II – 60,000 Kg</p> <ul style="list-style-type: none"> - Serial Number: B 5229896603 - Certificate Number: B 1574383 - Safety Label Number: (2.1K) Q017926 - Certificate Date: 03/06/2020 - Calibrator: DE Metrology Sdn Bhd 	
5.1.8	<p>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.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As of current, no scheme smallholders program managed by Sime Darby Sungai Dingin POM. Information of Sime Darby Plantation RSG programs available via website link http://www.simedarbyplantation.com/sustainability/programmes/supply-chain-sustainability/working-suppliers.</p>	Complied
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>There was no grievance received from external FFB suppliers since the last audit. In case of any SDPOM handled the process as per Standard Operation Manual; Date: 01/11/2008 that documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) for grievance handling.</p>	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	<p>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.</p>	<p>Sg. Dingin POM did not receive FFB from the schemed smallholders. Therefore, this indicator is not applicable.</p> <p>However consultations are made normally through meeting e.g. Meeting with stakeholders and FFB suppliers of Sungai Dingin Palm</p>	Not Applicable

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	- Minor compliance -	Oil Mill, latest conducted on 11/03/2020. Smallholders were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications.	
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 -	Sime Darby Plantation Berhad as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified external suppliers. Sg. Dingin POM did not receive FFB from the schemed smallholders. Therefore, this indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Sime Darby Plantation as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers. As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB. Sg. Dingin POM did not receive FFB from the schemed smallholders. Therefore, this indicator is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Sime Darby Plantation Berhad as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.	Not Applicable

		<p>As of current, no scheme smallholders program managed by Sungai Dingin POM. Information of Sime Darby Plantation RSG programs available via official website.</p> <p>The mill received no crop from smallholders. The outside crop suppliers being invited in the stakeholders meetings and briefing cum training are made in these sessions. Details as per minutes of meeting with the stakeholders.</p>	
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the FFB and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As of current, no group smallholders program is managed by Sungai Dingin POM. Information of Sime Darby Plantation RSG programs are available via SDP website.</p>	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting</p>	Complied

		reproductive and maternal rights. The policy could be downloaded from https://www.simedarbyplantation.com/sustainability/human-rights-charter .	
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>	Interviewed with the workers comprises of different gender and nationalities confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability. The worker can request for job transfer if they found they unfit for the job assigned to them.	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>	Sime Darby Plantation has developed a Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability, and the leadership quality of the worker. The recruitment of foreign workers is through Human Resource Department in HQ based the regulation requirements.	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>	Recruitment form is implemented in Sg. Dingin Estate which included Medical Examination in Section 2. One of the examination criteria under (v) is Pregnant (Female). Interviewed with the management that this criterion is as a safety measure to ensure the female workers not to assign for hazardous work such as chemical handling for pregnant woman. They will be assigning to light work if found pregnancy during recruitment. Interviewed with the female workers confirmed that no discrimination on the pregnancy by the management.	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>Gender Committee was established in Sg. Dingin POM and Sg. Dingin Estate. Seen the appointment letters of the committee.</p> <p>The committee has organized meeting and the last meetings were conducted on 24/07/2020, 22/10/2020 and 19/01/2021 in Sg. Dingin POM. Issues were raised during the meeting and recorded in the meeting minutes. Status of those issues raised during previous</p>	Complied

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		<p>meeting will be updated during the meeting. Management plan was developed for the issues raised and proposed action was identified. Detail refer to Indicator 3.4.2. Interviewed with the Chairman of Gender Committee in the mill confirmed no case of sexual harassment or violence reported. Issues raised were resolved accordingly.</p> <p>The last meetings conducted on 16/11/2020, 13/01/2021 and 05/04/2021 in Sg. Dingin Estate, 22/03/2021 in Anak Kulim Estate and 25/03/2021 in Bukit Selarong Estate. Meeting minutes were sighted with no issue reported. Female workers medical assessment 2020 was carried out on 17/03/2021 (Sg. Dingin Estate), 16/02/2021 (Anak Kulim Estate) and to monitor the health condition of the female workers. There was no new mother identified as of April 2021 in Sg. Dingin Estate and 16/02/2021 in Anak Kulim Estate. Two new mothers identified in Bukit Selarong Estate and new mother assessment was conducted. Refer to Indicator 6.5.3.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>The female workers employed in the mill and estate are local Malaysian. Reviewed total 48 payslips in Sg. Dingin POM, Sg Dingin Estate, Anak Kulim Estate and Bukit Selarong Estate which consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination. Interviewed with both the female and male workers confirmed that no discrimination has occurred.</p>	Complied
<p>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).</p>			
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>Sime Darby has sign the Collective Agreement with National Union of Plantation Workers (NUPW). Sample of employment contracts are reviewed and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Upon the</p>	Complied

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	- Critical (Major) compliance -	foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company's policies. This has confirmed by interviewed with the foreign workers.	
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>	Reviewed total 48 employment contracts in Sg. Dingin POM, Sg Dingin Estate, Anak Kulim Estate and Bukit Selarong Estate, and the contracts are signed in their dual language which is English and their home country language such as Hindi, Bahasa Malaysia/Indonesia. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract. The extension contract has outlined the terms and condition according to the Employment Act 1955 and Minimum Wage Order 2020. Version of extension contract, "Employment Contract Extension for Foreign Worker (Peninsular – Indonesia/ Nepalese) – ECE1 was sighted.	Complied
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>	48 samples for workers in various operations including mill operators, harvester, field workers and general workers were verified. Overtime was appropriate and deduction was made fairly as per the agreement and approval from the <i>Jabatan Tenaga Kerja</i> . Deduction was made as per the approval from Human Resource Department.	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The workers live in the housing complex of the mill and estate are provided with free housing facilities, subsidized water supply, electric supply and medical support.</p> <p>Linesite inspection was conducted weekly by the Quality Assurance (QA) in Sg. Dingin Palm Oil Mill using the Housing Complex/ Nest/ Community Hall Weekly Inspection Checklists (PIOA). The last inspection was conducted on 16/04/2021. Remarks/ comments were recorded if there is any issue found during the inspection. Action will be taken immediately if the issue could be solved.</p>	Complied

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		<p>Otherwise, the person in charge will announced during morning muster if there is a need of workers to take the action such as cleaning their housing compound. Besides, there was a monthly Housing Unit Inspection (EWR) carried out by the Employees Welfare Committee. The inspection was carried out on 02/04/2021. There was an 9 Employees Welfare meeting conducted on 25/01/2021 where it involves workers' representatives from Malaysia, Indonesia and India which consists of males and females. No issue was reported as seen in the meeting minutes.</p> <p>Medical Assistant of Sg. Dingin has conducted linesite inspection in four divisions (Main, Karangan, Mahang and Sedim). The last inspection was carried out on 15-16/04/2021. EWC has carried out bi-weekly once inspection as well. The last inspection was conducted on 09/04/2021. Any issues found during the inspection will take immediate action or will recorded in the Housing Repair & Defect Form.</p> <p>Anak Kulim Estate has made a progressive replacement of roofing from asbestos to zinc roof and ceiling. Seen the Tender Evaluation Report which approved by Region CEO. The replacement work is in progress as verified during the linesite visit.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>All the workers have provided with 10kg of rice once every two months as per company's policy. Seen the records of distribution of rice for January/ February 2021 in Sg. Dingin POM and Sg. Dingin Estate. Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where the mill and estate are neighbouring to the small town where they can easily access. Sundry shops were available inside the estates' compound as well.</p>	Complied

<p>6.2.6</p>	<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 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>SOU 1 Sg. Dingin has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. Sampled the prevailing wages for benefit of Maintenance & utilities – RM 128.68 for local workers and foreign workers, sports & recreation for RM 0.40 and phone reload – RM 5 for both local workers and foreign workers. The prevailing wages is more than the Minimum Wage Order 2020.</p>	<p>Complied</p>
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	<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 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 the core works are performed by permanent and full-time employees in SOU 1 Sg. Dingin POM and supply bases. No contract worker was employed. The estates have appointed contractor for FFB transporting.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Human Rights Charter where they respect Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, they will provide alternative means of employee engagement and grievance redressal.</p> <p>The briefing of the policies was conducted on 04 – 12/05/2020 in Sg. Dingin POM, 27/02/2021, 01-03/03/2021 in Sg. Dingin Estate, 03/03/2021 in Anak Kulim Estate and 10/02/2021 in Bukit Selarong Estate. Besides, any new employed workers will be briefed during induction training.</p>	Complied

<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>NUPW Committee was established in Sg. Dingin Palm Oil Mill and the last meeting was conducted on 26/02/2021. Issues were raised during the meeting and recorded in the meeting minutes. Management plan was developed for the issues raised by the NUPW representatives. Details refer to Indicator 3.4.2. Interviewed with the NUPW representatives confirmed that the issues raised during the meeting were in progress and some were resolved.</p> <p>There is NUPW committee established in Sg. Dingin Estate and meeting was carried out with the management to discuss workers' issues. The last meeting was conducted on 08/07/2020. Meeting minutes was sighted. Issues reported were recorded in the minutes. Action plan was developed in the social management plan.</p> <p>There was a meeting conducted on 02/02/2021 between NUPW Branch Secretary, NUPW representatives from Anak Kulim Estate and management of Anak Kulim Estate to discuss the complaint regarding the transfer of workplace from Anak Kulim Estate to other sister's estates such as Somme Estate, Sg. Dingin POM, Sg. Dingin Estate, Padang Buloh Estate, Holyrood Estate, Chersonese Estate and Tali Ayer Estate. Meeting minutes was sighted with the respond from the management. Action plan was developed as well dated 01/04/2021. At the end of the meeting, the workers are agreed with the proposed action from the management for the concerns raised. Interviewed with the Chairman of NUPW Anak Kulim confirmed that this case has been consulted and communicated to all the workers by the management and all the actions were carried out as per agreed such as top-up the addition RM 5 of transport allowance and provide van to send the workers from Anak Kulim Estate to Somme Estate. Besides, those workers who have transferred permanently to other sister's estates have signed on the consent letter for the transfer of workplace. Seen the consent letters.</p>	<p>Complied</p>
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		NUPW meeting was conducted on 19/03/2021 together with OSH meeting. Meeting minutes was sighted and there were some requests from the workers’ representatives. The requests have been included into the social management plan dated 04/04/2021 with action taken. Besides, the management has briefed to the committee on the engagement of parole program by the company.	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	Interviewed with the NUPW representatives and the workers confirmed that the election of the representatives were elected freely by the workers without any interference of management.	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. They are eradicating child labour in all their supply chain and not employ anyone underage of 18 years. All the contractors have to read through Vendor COBC before they signed on the Vendor Integrity Pledge. Under Clause 5.8, vendor shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate.	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above	Workforce Management Unit has developed SOPP under Clause 3.1.13 LR13 – Recruitment Drive & Interview/ Selection of Foreign	Complied

	<p>company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>Workers where the minimum requirement of the age is 18 years old. Besides, Guideline on the Recruitment of Local Workers dated 07/12/2020 has stated the applicant of workers must be above 18 years of age. Age screening is based on identification documents and/ or passport and from the stated date of birth. The local employees have to submit a photocopy of identification card during application of job to the management for verification purpose. Verified the records in the New Recruitment's file.</p>	
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>There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders.</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>The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders. This is confirmed through interviewed with the stakeholders.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict.</p> <p>The briefing of the policies was conducted on 04 – 12/05/2020 in Sg. Dingin POM, 27/02/2021, 01-03/03/2021 in Sg. Dingin Estate, 03/03/2021 in Anak Kulim Estate and 10/02/2021 in Bukit Selarong Estate. Besides, any new employed workers will be briefed during induction training.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p>	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.</p> <p>The briefing of the policies was conducted on 04 – 12/05/2020 in Sg. Dingin POM, 27/02/2021, 01-03/03/2021 in Sg. Dingin Estate, 03/03/2021 in Anak Kulim Estate and 10/02/2021 in Bukit Selarong Estate. Besides, any new employed workers will be briefed during induction training.</p>	
<p>6.5.3</p>	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Assessment for New Mothers (with infants under 24 months) FY2021 was conducted on 01/02/2021 in Sg. Dingin POM. There was one new mother identified in the mill with a child at age of 9 months during the assessment. No specific needs required from her. Interviewed with her to confirm that the management allowed her to take gate pass whenever she needs to go to the clinic for child vaccination. Management has given her flexibility if she needs to pump breastmilk.</p> <p>As of April 2021, there was no new mother in Sg. Dingin Estate and Anak Kulim Estate verified through interviewed with the Chairman of Gender Committee and female workers.</p> <p>There were two new mothers identified in Bukit Selarong Estate. Assessment for New Mothers was conducted on 18/01/2021 to consult the needs as new mother. Both the new mothers are given flexibility to breastfeed the baby. Interviewed with the two new mothers confirmed that the management allowed them to breastfeed and no extra overtime needed to compensate the time of breastfeed.</p>	<p>Complied</p>

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6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has developed Gender Committee Handbook, First Edition for implementation framework and guidelines where grievance reporting procedure for gender was developed. Any cases must be reported to Social & Environment Projects Unit of the PSQM Department. Incident report template was established. Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p> <p>A Complaint Form for Gender Committee was implemented in Sg. Dingin Estate and Bukit Selarong Estate to monitor if there is any case reported. As to date, there was no case reported.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. 	<p>Interviewed with the workers confirmed that no forced and trafficked labour in SOU 1 Sg. Dingin POM & supply bases. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. They keep their passport at the Passport Locker near the Security Guard Post. They can access to the</p>	Complied

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	<ul style="list-style-type: none"> • 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>passport anytime they want to. Overtimes was monitored by the company and the workers are giving freedom to choose to overtime and resign. There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed.</p> <p>Sime Darby Plantation Berhad has implemented Procedure on Foreign Worker’s Individual Passport Safe Keeping, Version No. 2 dated 10/10/2020. The new procedure is to set a guideline on the passport locker allocation to all the foreign workers. The workers in Sg. Dingin Estate has been briefed on the procedure and passport handover on 12/01/2021. Seen the record of training conducted. The workers have signed on the Appendix 01: Acknowledgement of Locker Facility for Passport Safekeepin. The workers will thumbprint for in and out of passport in Appendix 03: Logbook for Passport Locker. The workers will submit the passport to the management for renewal of permit.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby’s Human Rights Charter revised 2020 and can be easily access via www.simedarbyplantation.com where they committed as below:</p> <ul style="list-style-type: none"> a) Providing equal opportunity b) Respecting freedom of association c) Eradicating any form of exploitation d) Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs e) Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. 	Complied

		<p>All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow joining NUPW freely. No contract substitution has occurred through interviewed with the workers.</p>	
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. - Critical (Major) compliance -</p>	<p>The OSH Committee Members were appointed with the appointment letters available for verification together with the OSH Organisation Chart for the mill and estates.</p> <p><u>Sungai Dingin POM</u></p> <ol style="list-style-type: none"> 1. The Mill Manager, Mr. Subramaniam Govindasamy has been appointed as the as the JKKP Chairman for Sungai Dingin POM as stated in the appointment letter dated 02/01/2021 for the period 01/01/2021 – 31/12/2021. 2. Regular meetings were conducted to discuss Health and Safety Issues. Sighted JKKP Meeting Minutes dated 25/01/2021 and 30/10/2020. <p><u>Sungai Dingin Estate</u></p> <ol style="list-style-type: none"> 1. The management have appointed the Acting Sr. Manager, En. Mohd Rosli Mohamed Suhaimi as the Chairman of the JKKP for Sungai Dingin Estate. Sighted the appointment letter dated 2nd January 2021 undersigned by the Regional CEO. 2. Regular meetings were conducted to discuss Health and Safety Issues. Sighted JKKP Meeting Minutes dated 23/03/2021 and 26/12/2020. <p><u>Anak Kulim Estate</u></p>	<p>Complied</p>

		<ol style="list-style-type: none"> 1. The management have appointed the Manager, Mr. Nathan A/L Kannan as the Chairman of the JKKP for Anak Kulim Estate. Sighted the appointment letter dated 2nd January 2021 undersigned by the Regional CEO. 2. Regular meetings were conducted to discuss Health and Safety Issues. Sighted JKKP Meeting Minutes dated 12/04/2021 and 15/01/2021. <p><u>Bukit Selarong Estate</u></p> <ol style="list-style-type: none"> 1. The Estate Manager has been appointed as the OSH Committee Chairman for Bukit Selarong Estate as staed in the appointment letter dated 02/01/2021 undersigned by the Regional CEO. The committee members consist of representatives from the management and workers as well. Appointment letters for all committee members were available for verification. 2. Regular OSH Committee meetings were held in the estate to address all issues related to health and safety. Sighted the latest OSH Committee Meeting dated 19/03/2021, 19/12/2020 and 18/09/2020. 	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and Emergency Procedures is available in the Mill Quality Management System Standard Operation Manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3. Sighted during site visit to the mill and estate, all workstations and operations were well equipped with fire extinguishers and first aid kits. Noted during interview with employees and workers shows the understanding regarding emergency procedures.</p> <p>Sungai Dingin POM has established Emergency Response Team lead by the Mill Manager. Sighted during site visit, the ERT chart, Fire Hydrant and Fire Extinguisher Map were displayed at several notice boards in the mill.</p>	Complied

		<p>First aiders were present at various workstation at the mill and estate. The first aiders were responsible for first aid box at each workstation/operation. Interview with workers in the mill and estate field operations shows the awareness regarding the emergency procedure if accident occur, person responsible of every first aid box and the location of the nearest first aid box.</p> <p>Trainings on ERP and First Aid were available and verified as below:</p> <p><u>Sungai Dingin POM</u></p> <ol style="list-style-type: none"> 1. First Aid Training 2021 – 18/01/2021 2. Fire Drill Training – 25/01/2021 <p><u>Sungai Dingin Estate</u></p> <ol style="list-style-type: none"> 1. Refresher Training First Aid Kit – 17/04/2021 2. Basic Outbreak First Aid, CPR & AED Training – 29/03/2021 3. Fire & Emergency Drill – 24/12/2020 4. Fire Fighting & ERP Training – 24/12/2020 <p><u>Anak Kulim Estate</u></p> <ol style="list-style-type: none"> 1. Chemical Spillage and First Aid Drill – 04/03/2021 2. Training Fire Drill – 15/01/2021 3. First Aid Box Training – 23/03/2021 <p><u>Bukit Selarong Estate</u></p> <ol style="list-style-type: none"> 1. Chemical Spillage Training – 13/01/2021 2. First Aid Training – 29/03/2021 3. Fire Fighting Training – 05/08/2021 <p>Accident records were available and maintained by the mill and estate on a monthly basis and submitted to the HQ accordingly. JKKP 6 and JKKP 8 forms were available for verification.</p>	
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		<p><u>Sungai Dingin POM</u> There was 1 accident reported for the year 2020 involving a maintenance worker at the boiler station. The JKKP 8 Form for the year ending 2020 has been submitted to DOSH on 07/01/2021 and available for verification. There were no occupational accidents reported for the year 2021 as of to date.</p> <p><u>Sungai Dingin Estate</u> There was 1 accident reported for the year 2020 involving a harvester at the estate. The JKKP 8 Form for the year ending 2020 has been submitted to DOSH on 09/01/2021 and available for verification. There were 1 accident reported for the year 2021 as of to date involving a harvester. The incident detailed report and JKKP 6 form was submitted to DOSH and available for verification.</p> <p><u>Anak Kulim Estate</u> There were 3 accidents reported for the year 2020 at the estate. The JKKP 8 Form for the year ending 2020 has been submitted to DOSH on 11/01/2021 and available for verification. There was no accident reported for the year 2021 as of to date.</p> <p><u>Bukit Selarong Estate</u> There were no accidents reported for the year 2020 and 2021 as of to date. The JKKP 8 form has been submitted to DOSH for the year ending 2020 and was available for verification.</p>	
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>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals.</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>																																										
<p>6.7.4</p>	<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>Medical care is provided to all the employees. All estates have their own dispensary managed by a Medical Assistant. The dispensary provides medical care for workers and staffs for minor injuries and sickness free of charge. Major injuries or sickness are referred to the private Clinic or Hospital where the cost is borne by the management. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for all estate visited as below:</p> <table border="1" data-bbox="1137 815 1933 1378"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Number of Employees</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Sungai Dingin POM</td> <td>Jan 2021</td> <td>120</td> <td>RM 4,015.50</td> </tr> <tr> <td>Feb 2021</td> <td>119</td> <td>RM 4,092.30</td> </tr> <tr> <td>Mar 2021</td> <td>123</td> <td>RM 4,691.70</td> </tr> <tr> <td rowspan="3">Sungai Dingin Estate</td> <td>Jan 2021</td> <td>327</td> <td>RM 7,245.80</td> </tr> <tr> <td>Feb 2021</td> <td>328</td> <td>RM 8,269.40</td> </tr> <tr> <td>Mar 2021</td> <td>323</td> <td>RM 9,234.50</td> </tr> <tr> <td rowspan="3">Anak Kulim Estate</td> <td>Jan 2021</td> <td>87</td> <td>RM 2,180.60</td> </tr> <tr> <td>Feb 2021</td> <td>84</td> <td>RM 2,151.10</td> </tr> <tr> <td>Mar 2021</td> <td>68</td> <td>RM 1,937.50</td> </tr> <tr> <td rowspan="2"></td> <td>Jan 2021</td> <td>312</td> <td>RM 7,327.20</td> </tr> <tr> <td>Feb 2021</td> <td>301</td> <td>RM 8,261.80</td> </tr> </tbody> </table>	Operating Unit	Month	Total Number of Employees	Amount	Sungai Dingin POM	Jan 2021	120	RM 4,015.50	Feb 2021	119	RM 4,092.30	Mar 2021	123	RM 4,691.70	Sungai Dingin Estate	Jan 2021	327	RM 7,245.80	Feb 2021	328	RM 8,269.40	Mar 2021	323	RM 9,234.50	Anak Kulim Estate	Jan 2021	87	RM 2,180.60	Feb 2021	84	RM 2,151.10	Mar 2021	68	RM 1,937.50		Jan 2021	312	RM 7,327.20	Feb 2021	301	RM 8,261.80	<p>Complied</p>
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			Mar 2021	288	RM8,859.70																														
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>The Operating units recorded all injuries and accidents in the LTA format as below:</p> <table border="1"> <thead> <tr> <th rowspan="2">Operating Unit</th> <th colspan="2">2020</th> <th colspan="2">2021</th> </tr> <tr> <th>Cases</th> <th>LTA</th> <th>Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Sungai Dingin POM</td> <td>1</td> <td>3</td> <td>-</td> <td>-</td> </tr> <tr> <td>Sungai Dingin Estate</td> <td>1</td> <td>3</td> <td>1</td> <td>14</td> </tr> <tr> <td>Anak Kulim Estate</td> <td>3</td> <td>110</td> <td>-</td> <td>-</td> </tr> <tr> <td>Bukit Selarong Estate</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>				Operating Unit	2020		2021		Cases	LTA	Cases	LTA	Sungai Dingin POM	1	3	-	-	Sungai Dingin Estate	1	3	1	14	Anak Kulim Estate	3	110	-	-	Bukit Selarong Estate	-	-	-	-	Complied
Operating Unit	2020		2021																																
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Bukit Selarong Estate	-	-	-	-																															
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>IPM is documented in the (ARM) Agriculture Reference Manual. The estates continue to implement biological control for managing the oil palm pest in the plantation such as leaf eating pest, rodents and bagworms. IPM techniques applied at the estates include monitoring of pest population and the use of triggers for initiation of control measures. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. The estates have planted beneficial plants such as Cassia cobanensis and Turnera subulata and Antigonon leptopus.</p> <p>The estate has established IPM program on a yearly basis. The IPM Plan consists of Planting Beneficial Plant, Rat Baiting Applications and Barn Owl Census.</p>				Complied																													

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		The sampled estates have established IPM Plans and reviewed on annually. The plan FY 2021 was focusing on planting beneficial plant, control Ganoderma disease, increasing barn owl box ratio and to control rat damage. The plan was monitored on monthly basis.													
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	Species referenced in the Global Invasive Species Database and CABI.org are not used in the estates.	Complied												
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There was no evidence of use of fire for pest control in all the estates.	Complied												
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.															
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01/07/2011. Selected products are specific to the target pest, weed and disease.	Complied												
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -	Records of pesticides used (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate and submitted to the Head Quarters on a monthly basis. Sampled the chemicals a.i/ha used for the month Jan, Feb and Mar 2021 as below:	Complied												
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Operating Units</th> <th style="text-align: center;">Jan</th> <th style="text-align: center;">Feb</th> <th style="text-align: center;">Mar</th> </tr> </thead> <tbody> <tr> <td>Sungai Dingin Estate</td> <td style="text-align: center;">0.00408</td> <td style="text-align: center;">0.00540</td> <td style="text-align: center;">0.00231</td> </tr> <tr> <td>Anak Kulim Estate</td> <td style="text-align: center;">0.02000</td> <td style="text-align: center;">0.04000</td> <td style="text-align: center;">0.00000</td> </tr> </tbody> </table>	Operating Units	Jan	Feb	Mar	Sungai Dingin Estate	0.00408	0.00540	0.00231	Anak Kulim Estate	0.02000	0.04000	0.00000	
Operating Units	Jan	Feb	Mar												
Sungai Dingin Estate	0.00408	0.00540	0.00231												
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		Bukit Selarong Estate	0.84200	0.84300	0.00500	
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 estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</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 is no evidence of prophylactic use of pesticides in all estates visited.</p>				Complied
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> <ol style="list-style-type: none"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative What is the process to limit the negative impacts of the application 	<p>Paraquat was eliminated and alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III & IV chemical used at visited estates. Class 1A chemical Monocrotophos and Methamidophos was eliminated and in its place, Class III chemical Acephate is used for managing bagworm infestation.</p> <p>Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 02/12/2019 and Responsible Agriculture Charter under section 3.3: Protect and disclose environmental impacts and minimize resource use stated: 'We aim to minimize our footprint and continuously reduce our use of resources through:</p>				Complied

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	<p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>	<p>iv. Implementing integrated pest management programs, with no use of Paraquat or chemicals classed as hazardous under the WHO 1A. We will phase out the WHO 1B and those additional chemicals listed in the Stockholm or Rotterdam Conventions.”</p> <p>Sighted and verified in all chemical register for all estates sampled, there was no usage of Paraquat and other Class 1A or 1B pesticides. Based on the latest chemical register only class II, III & IV chemical used at visited estates.</p>	
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>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment’s and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estate.</p> <p>Sampled the training conducted for pesticide handlers as below:</p> <p><u>Sungai Dingin Estate</u></p> <ol style="list-style-type: none"> 1. MyCrop Chemical Spraying Training – 12/01/2021 2. Chemical Handling and SDS Training – 10/02/2021 <p><u>Anak Kulim Estate</u></p> <ol style="list-style-type: none"> 1. MyCrop Spraying Techniques Training – 19/01/2021 <p><u>Bukit Selarong Estate</u></p> <ol style="list-style-type: none"> 1. Circle Spraying Refresher Training – 05/02/2021 2. MyCrop Spraying Refresher Training – 26/11/2021 3. P&D Spraying Training – 22/11/2020 	Complied
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 found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of</p>	Complied

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		<p>visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p>	
<p>7.2.8</p>	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -</p>	<p>The procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established.</p> <ul style="list-style-type: none"> a) Collection of SW is made by CLM Conservation Sdn Bhd, Sime Darby Industrial, Dhakshinamoorthy Manufacturing Sdn Bhd. a) The clinical waste SW 404 is disposed to Flora Sentosa Sdn Bhd. b) Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s E-Idaman Sdn Bhd approved by DOE. <p>Visit to waste storage confirmed that empty pesticide containers were collected with proper storage. These items will be punctured and disposed as scheduled waste as the EQA. The SOP of disposal pesticide container is described in the estates in SOU 1, procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established. Content includes the triple rinsing procedures and the relevant training to be conducted.</p> <p>Visit to waste storage confirmed that empty pesticide containers were collected with proper storage. These items will be punctured and disposed as scheduled waste as the EQA.</p> <p>Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides containers are as follows:</p>	<p>Complied</p>

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		<p>a) All class 2 and above containers are tripled rinsed and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste.</p> <p>b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.</p> <p>These guidelines are based on Department Of Agriculture ref 91/120/038/014 dated 07/11/2002. During the site visit this has been adhered mainly containers are tripled rinsed and holes punctured at the container base. Sg. Dingin Estate dispatched the empty containers together with their SW disposal.</p> <table border="1" data-bbox="1198 750 1915 1013"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>Empty Containers</th> <th>Empty bags</th> </tr> </thead> <tbody> <tr> <td>Sg. Dingin</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Anak Kulim</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Bukit Selarong</td> <td>18/01/2021</td> <td>150 pcs</td> <td>-</td> </tr> <tr> <td>Sg. Dingin POM</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	Estate	Date	Empty Containers	Empty bags	Sg. Dingin	-	-	-	Anak Kulim	-	-	-	Bukit Selarong	18/01/2021	150 pcs	-	Sg. Dingin POM	-	-	-	
Estate	Date	Empty Containers	Empty bags																				
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Bukit Selarong	18/01/2021	150 pcs	-																				
Sg. Dingin POM	-	-	-																				
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>No aerial spray conducted at all operating units in SOU 1.</p>	<p>Complied</p>																				
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>All sampled estates have conducted medical surveillance on an annual basis for workers exposed to hazardous chemicals as described under USECHH 2000 Regulations and as recommended in the CHRA. Verified the sampled records of medical surveillance conducted as below:</p>	<p>Complied</p>																				

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		<p><u>Sungai Dingin Estate</u> Medical Surveillance was conducted by Poliklinik Sakhti (DOSH Registered OHD: HQ/12/DOC/00/262) for the year 2020. A total of 7 workers from the estate had been tested for physical examination, blood & urine, cholinesterase test and manganese exposure test. The cholinesterase test show all of them produce normal results. The manganese exposure test also shows normal for those tested.</p> <p><u>Anak Kulim Estate</u> Medical Surveillance was conducted by Poliklinik Sakhti (DOSH Registered OHD: HQ/12/DOC/00/262) on 17/03/2020. A total of 14 workers from the estate had been tested for physical examination, blood & urine and cholinesterase test. The cholinesterase test show all of them produce normal results.</p> <p><u>Bukit Selarong Estate</u> Medical Surveillance was conducted by Poliklinik Sakhti (DOSH Registered OHD: HQ/12/DOC/00/262) on 08/11/2020. A total of 13 workers from the estate had been tested for physical examination, blood & urine, cholinesterase test and manganese exposure test. The cholinesterase test show all of them produce normal results. The manganese exposure test also shows normal for those tested.</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. - Critical (Major) compliance -</p>	<p>Sime Darby has established Gender Policy on Motherhood Responsibilities and Reproductive Rights on prohibition of all confirmed pregnant and breast-feeding woman to work with pesticides. The policy has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the estates.</p>	Complied

		The estates visited prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as per internal memo signed by the estate manager. The memo has been displayed on the notice board at few strategic places in the estates.													
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>SOU 1 Sg, Dingin POM and all the 3 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2021 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1137 703 1868 1098"> <thead> <tr> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>Land</td> <td>Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste</td> </tr> </tbody> </table> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2021. The waste generated from the mill/estates operations as shown below:</p> <table border="1" data-bbox="1167 1281 1868 1380"> <thead> <tr> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> </tbody> </table>	Receptor	Sources	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste	Type of waste	Details	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	Complied
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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>In Sg. Dingin POM and the estates in SOU 1, procedure SD/SDP/PSQM (ESH)/203-EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <ul style="list-style-type: none"> a) Management and disposal of waste water 2021 has been established compiled by Assistant Engineer/Assistants/Staff. b) Waste Management Plan 2021 has been established prepared by QA and verified by the Assistant Engineer/Assistants/Staff. c) Waste Management Plan 2021 has been established in Jan 2021. d) Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact Identification (file no: SM/5.2/EAI) improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination. e) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood 	Complied														

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		<p>the hazards involved and how the chemicals should be used and disposed in a safe manner.</p> <p>f) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled waste is disposed to the following vendors registered with DOE. Used lubricants oil and used batteries were collected by SDI upon completion of every vehicles/engines servicing. DOE has made approval to authorize SDI via letter dated 06/09/2011. DOE letter of authority was sighted and verified. Flora Sentosa Sdn Bhd had appointment from Kualiti Alam via letter dated 16/03/2015.</p> <table border="1" data-bbox="1153 941 1915 1308"> <thead> <tr> <th>Estate/ Mill</th> <th>Date</th> <th>SW 110</th> <th>SW 409</th> <th>SW 305</th> <th>SW 404</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Sg. Dingin</td> <td>19/02/2021</td> <td>-</td> <td>1.220</td> <td>-</td> <td>-</td> </tr> <tr> <td>28/01/2021</td> <td>-</td> <td>-</td> <td>-</td> <td>0.001</td> </tr> <tr> <td>Anak Kulim</td> <td>21/01/2021</td> <td>-</td> <td>-</td> <td>0.800</td> <td>-</td> </tr> <tr> <td rowspan="2">Bukiy Selarong</td> <td>25/2/2021</td> <td>-</td> <td>-</td> <td>-</td> <td>0.001</td> </tr> <tr> <td>01/10/2020</td> <td>-</td> <td>-</td> <td>-</td> <td>0.001</td> </tr> <tr> <td>Sg. Dingin POM</td> <td>25/11/2020</td> <td>0.008</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	Estate/ Mill	Date	SW 110	SW 409	SW 305	SW 404	Sg. Dingin	19/02/2021	-	1.220	-	-	28/01/2021	-	-	-	0.001	Anak Kulim	21/01/2021	-	-	0.800	-	Bukiy Selarong	25/2/2021	-	-	-	0.001	01/10/2020	-	-	-	0.001	Sg. Dingin POM	25/11/2020	0.008	-	-	-	
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Sg. Dingin POM	11/11/2020	0.008	-	-	-
Sg. Dingin POM	04/11/2020	0.008	0.010	-	-

The scheduled waste is disposed to the following vendors registered with DOE.

Estate	Date	SW Buyers/Vendor
Sg. Dingin	30/04/2021	Dhakshinamoorthy Manufacturing
Anak Kulim	30/4/2021	Pentas Flora Sdn Bhd
Bukit Selarong	30/4/2020	Sime Darby Industrial
Sg. Dingin POM	30/4/2021	CLM Conservation Sdn Bhd
SW 404	30/4/2021	Flora Sentosa Sdn Bhd

Empty containers were despatched to licensed buyer namely E-Idaman as per communication email by DOE, Kulim branch dated 05/01/2019. Records of despatches sighted as follows:

Estate	Date	Chemical containers
Sg. Dingin	-	-
Anak Kulim	-	-
Bukit Selarong	18/01/2021	150 pcs

		<p>Domestic waste for the operating units in SOU 01 was disposed as follows;</p> <table border="1" data-bbox="1160 446 1883 778"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">Disposal site</th> <th rowspan="2">Remarks</th> </tr> <tr> <th>Estate</th> <th>External</th> </tr> </thead> <tbody> <tr> <td>Sg. Dingin</td> <td>-</td> <td>MDK</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Anak Kulim</td> <td>P2001A</td> <td>/</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Bukit Selarong</td> <td>P18D/99 M</td> <td>/</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Sg. Dingin POM</td> <td>-</td> <td>MDK</td> <td>Collection by SDE</td> </tr> </tbody> </table> <p>Evidences of collection were verified through the payment made to the Majlis Daerah Kulim e.g bill no 2021/03-04 dated 31/05/2021.</p>		Disposal site		Remarks	Estate	External	Sg. Dingin	-	MDK	Collection 2/3 x week	Anak Kulim	P2001A	/	Collection 2/3 x week	Bukit Selarong	P18D/99 M	/	Collection 2/3 x week	Sg. Dingin POM	-	MDK	Collection by SDE	
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7.3.3	<p>The unit of certification does not use open fire for waste disposal. - Minor compliance -</p>	<p>There was no land preparation in SOU 01 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS SOP Section-B2 under felling/clearing & land preparation b) Carbon Policy <p>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																						
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>																									
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -</p>	<p>SOU 1 continued to use and implement SOPs for each of the processes. Brief version of the SOPs was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being</p>	Complied																						

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		<p>implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs.</p> <ul style="list-style-type: none"> a) Agriculture Reference Manual (ARM) dated 01/07/2011 b) Estate Quality Management System (EQMS) Manual dated 01/11/2008 c) Safety Standard Operating Procedures (SSOP) dated 25/02/2015 d) Sustainable Plantation Management System Manual (SPMS) e) "Guidelines On River Management" Manual, ESH Management System Manual dated 01/07/2012 f) Occupational Safety and Health Manual dated 03/03/2008 g) Pictorial Safety Standards and Security Guidelines (PSS) h) Plantations/Mill Quality Management System (PQMS/MQMS) std operating manual <p>All the estates and mill operations were guided through the manuals and SOPs. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/ workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>	
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<p>7.4.2</p>	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - 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. For all 3 estates Agronomic assessment and fertiliser recommendation was conducted by Sime Darby Research Plant Nutrition & Protection Unit PNP Northern Region to formulate the 2021 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been were carried out in all estates. The latest being :</p> <table border="1" data-bbox="1205 715 1854 852"> <thead> <tr> <th>Estate</th> <th>Report Date</th> <th>Report No</th> </tr> </thead> <tbody> <tr> <td>Sg. Dingin</td> <td>10/12/2020</td> <td>SDE 2021</td> </tr> <tr> <td>Anak Kulim</td> <td>04/03/2015</td> <td>S28/2015</td> </tr> <tr> <td>Bukit Selarong</td> <td>06/10/2020</td> <td>P331/2020</td> </tr> </tbody> </table> <p>Soil analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca & Exch Mg was carried out on a 5 year cycle basis and last carried out as follows:</p> <table border="1" data-bbox="1249 948 1899 1085"> <thead> <tr> <th>Estate</th> <th>Report Date</th> <th>Report No</th> </tr> </thead> <tbody> <tr> <td>Sg. Dingin</td> <td>20/09/2018</td> <td>S65/2018</td> </tr> <tr> <td>Anak Kulim</td> <td>21/06/2018</td> <td>S43/2018</td> </tr> <tr> <td>Bukit Selarong</td> <td>24/04/2019</td> <td>S50/2019</td> </tr> </tbody> </table> <p>All foliar and soil sampling & analysis was conducted by Sime Darby Research Plant Nutrition & Protection Unit PNP Northern Region. Soil analysis is made on a 5 year cycle. Anak Kulim Estate had a lapse of years without manuring program for the 207 ha of OP. There were no visit for foliar due to the decision by the management of halting the fertilizer program. The decision was reversed with a new foliar sampling taking place on 21/04-30/04/2021. The email form estate was sighted and verified.</p>	Estate	Report Date	Report No	Sg. Dingin	10/12/2020	SDE 2021	Anak Kulim	04/03/2015	S28/2015	Bukit Selarong	06/10/2020	P331/2020	Estate	Report Date	Report No	Sg. Dingin	20/09/2018	S65/2018	Anak Kulim	21/06/2018	S43/2018	Bukit Selarong	24/04/2019	S50/2019	<p>Complied</p>
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<p>7.4.3</p>	<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>All the 3 estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled, chipped, windowed and left to decompose. Records showed that the estates applied EFB at 20 tons/ha in 2020 are as follows:</p> <table border="1" data-bbox="1205 587 1803 826"> <thead> <tr> <th>Estate</th> <th>Field no</th> <th>Ha</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td>Sg. Dingin</td> <td>2002B</td> <td>8.91</td> <td>178</td> </tr> <tr> <td>Sg. Dingin</td> <td>2012A</td> <td>56.32</td> <td>1126</td> </tr> <tr> <td>Sg. Dingin</td> <td>2013D</td> <td>61.15</td> <td>1223</td> </tr> <tr> <td>Bukit Selarong</td> <td>P2011B</td> <td>55</td> <td>1100</td> </tr> <tr> <td>Bukit Selarong</td> <td>P2012A</td> <td>36</td> <td>720</td> </tr> <tr> <td>Bukit Selarong</td> <td>P2914C</td> <td>14</td> <td>280</td> </tr> </tbody> </table>	Estate	Field no	Ha	Mt	Sg. Dingin	2002B	8.91	178	Sg. Dingin	2012A	56.32	1126	Sg. Dingin	2013D	61.15	1223	Bukit Selarong	P2011B	55	1100	Bukit Selarong	P2012A	36	720	Bukit Selarong	P2914C	14	280	<p>Complied</p>
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<p>7.4.4</p>	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records revealed that the actual fertilizers applied in 2020 was in line with the program. The following fertilizers were applied in SOU 01 estates subject to the recommendation by the Agronomist.</p> <table border="1" data-bbox="1169 1050 1899 1321"> <thead> <tr> <th>Fertilizer</th> <th>Kg/palm</th> <th>Application month</th> </tr> </thead> <tbody> <tr> <td>A chloride</td> <td>1.50-1.75</td> <td>Jan - Feb</td> </tr> <tr> <td>MOP</td> <td>1.50-2.25</td> <td>Jan - Feb</td> </tr> <tr> <td>Kieserite</td> <td>1.00-1.50</td> <td>April</td> </tr> <tr> <td>Borate</td> <td>0.10</td> <td>May</td> </tr> <tr> <td>A Sulphate</td> <td>1.75</td> <td>Jan</td> </tr> <tr> <td>NK C1</td> <td>3.00-4.00</td> <td>Sept</td> </tr> <tr> <td>Borate</td> <td>0.10</td> <td>Nov</td> </tr> </tbody> </table>	Fertilizer	Kg/palm	Application month	A chloride	1.50-1.75	Jan - Feb	MOP	1.50-2.25	Jan - Feb	Kieserite	1.00-1.50	April	Borate	0.10	May	A Sulphate	1.75	Jan	NK C1	3.00-4.00	Sept	Borate	0.10	Nov	<p>Complied</p>				
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.

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7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows:</p> <table border="1" data-bbox="1167 459 1897 965"> <thead> <tr> <th>Soil series</th> <th>Sg. Dingin</th> <th>Anak Kulim</th> <th>Bukit Selarong</th> </tr> </thead> <tbody> <tr><td>Chat</td><td>22.93</td><td>-</td><td>-</td></tr> <tr><td>Pohoi</td><td>16.20</td><td>-</td><td>-</td></tr> <tr><td>Tebuk</td><td>8.16</td><td>-</td><td>-</td></tr> <tr><td>Batu Lapan</td><td>7.07</td><td>-</td><td>-</td></tr> <tr><td>Gajah Mati</td><td>5.70</td><td>-</td><td>12.84</td></tr> <tr><td>Rasau</td><td>24.45</td><td>-</td><td>6.13</td></tr> <tr><td>Rengam</td><td>7.34</td><td>95.78</td><td>-</td></tr> <tr><td>Bungor</td><td>1.86</td><td>-</td><td>-</td></tr> <tr><td>Local alluv</td><td>6.29</td><td>4.22</td><td>4.21</td></tr> <tr><td>Muck</td><td>-</td><td>-</td><td>0.34</td></tr> <tr><td>Munchong</td><td>-</td><td>-</td><td>18.45</td></tr> <tr><td>Sg Buloh</td><td>-</td><td>-</td><td>1.01</td></tr> <tr><td>Unclassified</td><td>-</td><td>-</td><td>57.02</td></tr> <tr><td>TOTAL</td><td>100.00</td><td>100.00</td><td>100.00</td></tr> </tbody> </table> <p>There were no other problem soils (e.g. podzols and acid sulphate soils) on SOU 1 Sg. Dingin.</p>	Soil series	Sg. Dingin	Anak Kulim	Bukit Selarong	Chat	22.93	-	-	Pohoi	16.20	-	-	Tebuk	8.16	-	-	Batu Lapan	7.07	-	-	Gajah Mati	5.70	-	12.84	Rasau	24.45	-	6.13	Rengam	7.34	95.78	-	Bungor	1.86	-	-	Local alluv	6.29	4.22	4.21	Muck	-	-	0.34	Munchong	-	-	18.45	Sg Buloh	-	-	1.01	Unclassified	-	-	57.02	TOTAL	100.00	100.00	100.00	Complied
Soil series	Sg. Dingin	Anak Kulim	Bukit Selarong																																																												
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7.5.2	<p>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 -</p>	<p>Like all SDPB Estates, the estates visited in SOU 1 continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ol style="list-style-type: none"> a) Slope & River Protection Policy b) Buffer Zone & 25-degree slope and in item 8 Section 4 c) Land Preparation for Terracing in ARM Manual. <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying,</p>	Complied																																																												

		<p>construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop mucuna bracteata had been planted along some slopes by management. Large areas with neprolepis biserrata in the inter rows were sighted during the visit. The slope maps for the titled ha were provided by the R&D Precision Agriculture Unit with details as follows:</p> <table border="1"> <thead> <tr> <th>Topography</th> <th>Sg. Dingin</th> <th>Anak Kulim</th> <th>Bukit Selarong</th> </tr> </thead> <tbody> <tr> <td>0-2</td> <td>-</td> <td>3.40</td> <td>55.90</td> </tr> <tr> <td>2-6</td> <td>100.00</td> <td>20.48</td> <td>36.72</td> </tr> <tr> <td>6-12</td> <td>-</td> <td>36.88</td> <td>6.18</td> </tr> <tr> <td>12-20</td> <td>-</td> <td>31.27</td> <td>1.04</td> </tr> <tr> <td>20-25</td> <td>-</td> <td>8.86</td> <td>0.12</td> </tr> <tr> <td>>25</td> <td>-</td> <td>1.13</td> <td>0.05</td> </tr> <tr> <td>Total</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> </tbody> </table>	Topography	Sg. Dingin	Anak Kulim	Bukit Selarong	0-2	-	3.40	55.90	2-6	100.00	20.48	36.72	6-12	-	36.88	6.18	12-20	-	31.27	1.04	20-25	-	8.86	0.12	>25	-	1.13	0.05	Total	100%	100%	100%	
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Total	100%	100%	100%																																
7.5.3	<p>There is no new planting of oil palm on steep terrain. - Minor compliance -</p>	<p>This compliance being addressed in the "Slope and River Protection" signed by the CEO dated Jan 2015 stating the following among others: "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".</p>	Complied																																
<p>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.</p>																																			
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.</p>	Complied																																

7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited. Addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2:</p> <ul style="list-style-type: none"> a) Protect and enhance forest: "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through: <ul style="list-style-type: none"> i. No new development of peat areas, regardless of depth or location. ii. We will seek to rehabilitate existing plantings on peats where possible. 	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Soil surveys are done and available in a soil map at all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.</p>	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil all estates visited. The auditor verified there is no new planting activity in the estate visited.</p>	Complied
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil all estates visited. The auditor verified there is no new planting activity in the estate visited.</p>	Complied
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil all estates visited. The auditor verified there is no new planting activity in the estate visited.</p>	Complied

7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the Sime Darby Agricultural Reference Manual (Water Management in Coastal and Peat lands) issued on 01/07/2011. Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following:</p> <ul style="list-style-type: none"> a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations b) Contingency during water shortage c) Field water management - side pit construction d) Adequate field drains e) Reuse/recycle waste water f) Peat soil water management 	Complied
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> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.</p>	Complied
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>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.</p>	Complied

	- Critical (Major) compliance -														
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>	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied												
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.															
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>SOU 1 Sg. Dingin had established its Water Management Plan 2021 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as:</p> <ul style="list-style-type: none"> a) Implementation of rain water harvest b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level c) daily monitoring of bund / scheduled maintenance d) Establishment of mucuna bracteata to prevent erosion e) Side drain at field road to control water, frond stacking f) Enhancement of ground vegetation at bare ground area <p>The water sources are as shown below:</p> <table border="1"> <thead> <tr> <th>Water source</th> <th>Usage</th> <th>Monitoring & measurement</th> <th>Freq</th> <th>PIC</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Water source	Usage	Monitoring & measurement	Freq	PIC	Review status							Complied
Water source	Usage	Monitoring & measurement	Freq	PIC	Review status										

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		SADA	Purchased for domestic consumption	Monitoring water supply	monthly	AM Manager	Liaison with Authority												
		Rain water	Domestic use Workshop Chemical mixing	Rain fall data	Ongoing	AM Manager	Water harvesting for general washing												
		Water tank	Emergency water supply	-	-	AM Manager	Request water supply from other estates												
<p>The contingency plan during water shortage:</p> <table border="1"> <thead> <tr> <th>Area/incident</th> <th>Action steps</th> <th>PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Water shortage / prolonged dry season</td> <td>To obtain water from local authority /Mill catchment To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP</td> <td>Manager AM/Mill Engineer</td> <td>As and when required</td> </tr> <tr> <td>Severe water</td> <td>To obtain water from SADA</td> <td>Manager AM//Mill Engineer</td> <td>As and when</td> </tr> </tbody> </table>								Area/incident	Action steps	PIC	Status	Water shortage / prolonged dry season	To obtain water from local authority /Mill catchment To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP	Manager AM/Mill Engineer	As and when required	Severe water	To obtain water from SADA	Manager AM//Mill Engineer	As and when
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		<p>pollution / Contamination</p> <p>To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP</p>		<p>required</p>																
<p>The Estates had implemented water managements plans which covered:</p>																				
<p>a) Water shortage contingencies b) Water pollution prevention c) Reduce wastage d) Identification & management of waste waters e) Monitoring rainfall f) Regular water quality analysis</p>																				
<p>Water management plan review date was sighted and verified with records as follows:</p>																				
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			The rainwater shall be recycled for washing heavy machinery		
		Leakage on plumbing system	Frequent inspection to detect leakage Fix any leakage	AM/Field staff	On-going
		Water compartmentalization	To conserve level of soil moisture To minimize water stress during dry season	AM/Field staff	On-going
		Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going
		education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going
		Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going
The Mill Identification & Management of Waste Water:					
		Location	Wastewater produced	Treatment/containment	Reuse/recycle/disposal method
		Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system

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		Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain													
		Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain													
		Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain													
		Lab	Cleaning water	Process drain	Monsoon drain													
		Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.													
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>The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table border="1" data-bbox="1189 1118 1877 1321"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 m</td> <td>50 m</td> </tr> <tr> <td>20 - 40 m</td> <td>40 m</td> </tr> <tr> <td>10 - 20 m</td> <td>20 m</td> </tr> <tr> <td>5 - 10 m</td> <td>10 m</td> </tr> <tr> <td>< 5 m</td> <td>5 m</td> </tr> </tbody> </table>				River width	Buffer zone	> 40 m	50 m	20 - 40 m	40 m	10 - 20 m	20 m	5 - 10 m	10 m	< 5 m	5 m	Complied
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The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSD Unit with latest

Parameter	Standard	Parameter	Standard
pH	6-9	SS	50
BOD	3	AN	0.3
COD	25	DO	5-7
Parameter	Standard	Parameter	Standard
Aldrin	0.02 ppb	Heptachlor	0.05 ppb
Dieldrin	0.02 ppb	lindane	2 ppb
t-DDT	0.1 ppb	endosulfan	10 ppb
BHC	2 ppb	Chlordane	0.08 ppb

revision dated on 13/06/2011. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:

Estate	Buffer zone area
Sg. Dingin	Sg Dingin P95D / P97A1
Anak Kulim	Sg Kulim (Ex Rubber field)
Bukit Selarong	Sg Sedim Main Division
Sg. Dingin POM	Water catchment area / POME pond

Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Among others parameters as shown below:

Among others management plan taken:

- a) Regular inspection at buffer/HCV areas
- b) Monitor water from surrounding areas
- c) Track, measure and report all activities around river

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		<p>d) Train and educate workers. The sampling sites taken as follows. There were no issues on the water quality. Variation if any is investigated as per the SOP.</p> <table border="1" data-bbox="1137 1050 1908 1252"> <thead> <tr> <th>Estate</th> <th>Point A</th> <th>Point B</th> <th>Point C</th> </tr> </thead> <tbody> <tr> <td>Sg. Dingin</td> <td>Sg. Dingin</td> <td>Sg. Dingin</td> <td>Sg. Dingin</td> </tr> <tr> <td>Anak Kulim</td> <td>Sg. Kulim</td> <td>Sg. Kulim</td> <td>-</td> </tr> <tr> <td>Bukit Selarong</td> <td>Sg. Jemerli</td> <td>Sg. Selarong</td> <td>Sg. Sedim</td> </tr> <tr> <td>Sg. Dingin POM</td> <td>Kg Ulu Pasir</td> <td>Tmn Sg Dingin</td> <td>-</td> </tr> </tbody> </table>	Estate	Point A	Point B	Point C	Sg. Dingin	Sg. Dingin	Sg. Dingin	Sg. Dingin	Anak Kulim	Sg. Kulim	Sg. Kulim	-	Bukit Selarong	Sg. Jemerli	Sg. Selarong	Sg. Sedim	Sg. Dingin POM	Kg Ulu Pasir	Tmn Sg Dingin	-	
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7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p>	<p>Based on <i>Jadual Pematuhan</i> Sg. Dingin POM disposed effluent on land application via furrow system in Sg. Dingin Estate. Sighted quarterly report has been submitted to DOE (license no 0004543 01/07/2020 - 30/06/2021) by quarterly basis. Latest submission for</p>	Complied																				

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	<p>- Minor compliance -</p>	<p>to DOE on 16/03/2020 for period Jan to Mac 2021. Among others the indicators were:</p> <table border="1" data-bbox="1182 459 1809 730"> <thead> <tr> <th>Oct – Dec 19</th> <th>STD</th> <th>Jan</th> <th>Feb</th> <th>Mac</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>5-9</td> <td>8.2</td> <td>7.1</td> <td>7.7</td> </tr> <tr> <td>BOD mg/l</td> <td>5000</td> <td>112</td> <td>66</td> <td>136</td> </tr> <tr> <td>A Nitrogen</td> <td>-</td> <td>68</td> <td>172</td> <td>126</td> </tr> <tr> <td>Total N</td> <td>-</td> <td>92</td> <td>183</td> <td>240</td> </tr> <tr> <td>Oil & Grease</td> <td>-</td> <td>3</td> <td>2</td> <td>7</td> </tr> </tbody> </table> <p>All parameters tested complied with regulatory standards.</p>	Oct – Dec 19	STD	Jan	Feb	Mac	pH	5-9	8.2	7.1	7.7	BOD mg/l	5000	112	66	136	A Nitrogen	-	68	172	126	Total N	-	92	183	240	Oil & Grease	-	3	2	7																			
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>The mill processing water are obtained from the SADA and water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis. The usage in 2020 is as follows;</p> <table border="1" data-bbox="1211 976 1850 1382"> <thead> <tr> <th>Month</th> <th>Water/mt</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>22294</td> <td>18706</td> <td>1.19</td> </tr> <tr> <td>Feb</td> <td>36984</td> <td>26498</td> <td>1.40</td> </tr> <tr> <td>Mac</td> <td>36810</td> <td>28798</td> <td>2.01</td> </tr> <tr> <td>Apr</td> <td>35152</td> <td>29309</td> <td>1.20</td> </tr> <tr> <td>May</td> <td>35424</td> <td>25156</td> <td>1.41</td> </tr> <tr> <td>Jun</td> <td>34309</td> <td>27171</td> <td>1.26</td> </tr> <tr> <td>July</td> <td>28617</td> <td>28617</td> <td>1.20</td> </tr> <tr> <td>Aug</td> <td>28643</td> <td>18055</td> <td>1.59</td> </tr> <tr> <td>Sep</td> <td>26664</td> <td>19827</td> <td>1.34</td> </tr> <tr> <td>Oct</td> <td>28512</td> <td>15782</td> <td>1.81</td> </tr> <tr> <td>Nov</td> <td>22814</td> <td>12461</td> <td>1.83</td> </tr> </tbody> </table>	Month	Water/mt	FFB /mt	Water /FFB	Jan	22294	18706	1.19	Feb	36984	26498	1.40	Mac	36810	28798	2.01	Apr	35152	29309	1.20	May	35424	25156	1.41	Jun	34309	27171	1.26	July	28617	28617	1.20	Aug	28643	18055	1.59	Sep	26664	19827	1.34	Oct	28512	15782	1.81	Nov	22814	12461	1.83	Complied
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		Dec	24092	12420	1.94	
		A slightly higher water usage noted, due to the proportionate reduction in volume of FFB being processed. There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance.				
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised						
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report 2021. The document was reviewed/updated on Jan 2021. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:				Complied
		Target	Objective	Action plan		
		Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel		
		Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.		
		Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources		

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The utilization of fossil fuel in 2020 is being monitored with records shown below:

Site	Sg. Dingin Estate 2020			Bukit Selarong Estate 2020		
Mth	FFB mt	Diesel L	Diesel/FFB	FFB mt	Diesel L	Diesel/FFB
Jan	3279	5597	1.71	2873	6691	2.33
Feb	4159	7699	1.85	3847	8049	2.09
Mac	4221	7128	1.69	4430	7402	1.67
Apr	4233	7290	1.72	5212	6449	1.24
May	3939	6507	1.65	4291	7189	1.68
Jun	4272	6590	1.54	4867	6917	1.42
July	4482	7496	1.67	4487	8360	1.86
Aug	3829	4795	1.25	3099	18068	5.83
Sep	3906	5860	1.50	3274	14463	4.42
Oct	3335	6008	1.80	2727	6920	2.54
Nov	2714	6379	2.35	2106	7583	3.60
Dec	2299	5229	2.27	1845	8926	4.84

Site	Anak Kulim Estate 2020			Sg. Dingin POM 2020		
Mth	FFB mt	Diesel L	Diesel/FFB	FFB mt	Diesel L	Diesel/FFB
Jan	403	2670	6.63	18706	2118	0.11
Feb	392	6135	15.63	26498	3114	0.12
Mac	350	3700	10.55	28798	3719	0.13
Apr	275	2435	8.85	29309	2731	0.09
May	217	2500	11.48	25156	3215	0.13
Jun	232	1834	7.88	27171	3158	0.12
July	286	2307	8.05	28617	2042	0.07
Aug	258	2475	9.58	18055	2054	0.11
Sep	269	2615	9.70	19827	2873	0.14

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Oct	267	1780	6.66	15782	2041	0.13
Nov	252	1260	4.99	12461	2144	0.17
Dec	262	1508	5.75	12420	2843	0.23

The estate and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.

Performance variation in view of several factors i.e.

- a) Infrastructure of estates
- b) Community size / no of gen-sets
- c) No. of vehicles / age of machine
- d) Weather interference / crop production volume

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.

Sg Dingin POM and all Estates:

A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2021 identified in the following:

- a) Environmental Aspect Identification Summary FY 2021 reviewed accordingly
- b) Environmental Impact Evaluation Summary FY 2021 reviewed accordingly

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		<p>Renewable energy usage & diesel consumption 2020 was established and monitored by monthly basis. Among others effort to reduce diesel usage includes the following:</p> <ul style="list-style-type: none"> a) By maintenance of the boiler & machinery to ensure at optimum level b) to monitor diesel usage c) provide training to workers regarding reduce fuel and diesel usage for boiler 	
<p>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.</p>			
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>SOU 1 Sg. Dingin had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <ul style="list-style-type: none"> a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and genset to prevent any leakage and problem that could adverse impact the environment. b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report. 	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> <p>- Critical (Major) compliance -</p>	<p>SOU 1 Sg. Dingin has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. There is no new development within estates in SOU 1 Sg. Dingin.</p>	Complied
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>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate/ soot emissions and effluent. The SOU 1 Sg. Dingin has continued to maintain its environmental aspects/impacts register associated</p>	Complied

with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:

Environmental Receptors	Source
Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).
Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down
land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.

Sg. Dingin POM conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS was found to be in functional condition. Data from the stack is connected online to DOE's office. Boiler smoke emission data are within the DOE limit.

		<p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate/ soot emissions and effluent.</p> <p>Pollution prevention plan and waste management action plan is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among of action has been taken were:</p> <ul style="list-style-type: none"> a) Scheduled wastes – were disposed through CLM Conservation Sdn Bhd, Sime Darby Industrial, Dhakshinamoorthy Manufacturing Sdn Bhd and Flora Santos Sdn Bhd (clinical waste). b) Domestic wastes are disposed to Majlis Daerah Kulim landfill twice a week accumulated at designated area located far from housing complexes and waterways for Sg Dingin Estate and mill. c) Full compliance to zero burning practices. 	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in SOU 1 Sg. Dingin by burning ever since Sime Darby Plantation Berhad practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Carbon Policy <p>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, windrow-ed 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
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p>	<p>This is established in the ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> dated 12/09/2019. Therein containing:</p>	Complied

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	<p>- Minor compliance -</p>	<ul style="list-style-type: none"> a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>The procedure was formalised by RSQM for use in all operating units in SDP Estates and mills. Training related to fire drill / prevention are conducted annually.</p> <table border="1" data-bbox="1160 651 1912 850"> <thead> <tr> <th>Estate/ Mill</th> <th>Date</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Sg. Dingin</td> <td>24/12/2020</td> <td>18/08/2020</td> <td>-</td> </tr> <tr> <td>Bukit Selarong</td> <td>03/02/2021</td> <td>05/08/2020</td> <td>02/02/2020</td> </tr> <tr> <td>Anak Kulim</td> <td>14/08/2020</td> <td>15/01/2021</td> <td>-</td> </tr> <tr> <td>Sg. Dingin POM</td> <td>187/08/2020</td> <td>25/01/2021</td> <td>-</td> </tr> </tbody> </table>	Estate/ Mill	Date	Date	Date	Sg. Dingin	24/12/2020	18/08/2020	-	Bukit Selarong	03/02/2021	05/08/2020	02/02/2020	Anak Kulim	14/08/2020	15/01/2021	-	Sg. Dingin POM	187/08/2020	25/01/2021	-	
Estate/ Mill	Date	Date	Date																				
Sg. Dingin	24/12/2020	18/08/2020	-																				
Bukit Selarong	03/02/2021	05/08/2020	02/02/2020																				
Anak Kulim	14/08/2020	15/01/2021	-																				
Sg. Dingin POM	187/08/2020	25/01/2021	-																				
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Both the estates and the mill in SOU 1 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> dated 12/09/2019 and Fire Prevention and Control Measure. Therein containing:</p> <ul style="list-style-type: none"> a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>All stakeholders being briefed in the respective stakeholders meetings. The recent being on 17/03/2021 and 19/02/2021 through correspondence made to all stakeholders informing on the compliance to RSPO/ ISCC/ MSPO/ SCCS in accordance with SDP MQMS/ EQMS. This is inclusive on the fire prevention and control measures akin to the earlier session in meetings. There was no live consultation in 2020/ 2021 due to MCO restriction.</p>	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	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest</p> <p style="text-align: right;">Complied</p>								
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: 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>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest.</p> <p>Hence the current HCV assessment of the estates remains valid. The recent HCV assessment for the entire SOU 1 covering all the estates and the mill was performed in Mac 2017 by the PSD personnel. Methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas:</p> <ul style="list-style-type: none"> a) Overview of HCV assessment b) Description of assessment areas c) Finding and discussion <ul style="list-style-type: none"> - landscape context - HCV criteria and application to agriculture d) HCV monitoring and management <p>In summary the areas covered within the SOU 1 landholdings is 63.71 ha and the HCV areas presence as summarized below.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Estate</th> <th>HCV area</th> <th>Area</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Anak Kulim</td> <td>Water fall area</td> <td>0.05</td> <td></td> </tr> </tbody> </table> <p style="text-align: right;">Complied</p>	Estate	HCV area	Area	HCV	Anak Kulim	Water fall area	0.05	
Estate	HCV area	Area	HCV							
Anak Kulim	Water fall area	0.05								

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			Pond	0.03	4	.	
			Natural spring water	1 point			
			River reserve (Sg Dingin)	1.64			
		Sg. Dingin	River reserve (Sg Dingin)	3.56			
		Sg. Dingin POM	Pond	30.81			
		Bukit Selarong	River Reserve (Sg Sedim)	32.10			
			Pond	2.14			
		Padang Buluh	River Reserve (Sg Jerung)	14.12			
			Pond	0.22			
		Bukit Hijau	River Reserve (Sg Selambau)	5.33			
		Jentayu	Pond	0.71			
			Total	63.71			
7.12.3	<i>Indicator is not applicable in Malaysia context</i>						Not Applicable
7.12.4	(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>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 1 estates (refer 7.3.1 to 7.4.2).</p> <p>The recent HCV assessment for the entire SOU 1 Sg. Dingin covering all the 4 estates and the mill was performed in Mac 2017 by the PSD personnel. Methodology is through site observation, interviews, stakeholders consultation and desktop review on available</p>					Complied

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	<p>- Critical (Major) compliance -</p>	<p>secondary data. The assessment among others covers the following areas;</p> <ul style="list-style-type: none"> a) Overview of HCV assessment b) Description of assessment areas c) Finding and discussion <ul style="list-style-type: none"> - landscape context - HCV criteria and application to agriculture d) HCV monitoring and management <p>Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation.</p>	
<p>7.12.5</p>	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>There was no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird, presence of wild boar and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2020.</p>	<p>Complied</p>
<p>7.12.6</p>	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 1 estates (refer 7.3.1 to 7.4.2).</p>	<p>Complied</p>

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	for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -		
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 -	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 1 estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any.	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 SOU 1 estates (refer 7.3.1 to 7.4.2).	Complied

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Appendix B: Approved Time Bound Plan

SDP- RSPO Certification Status for Malaysia Operations

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11-Aug-25	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	Mill was closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-25	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-25	RSPO 543594	N.A
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Mill was closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020, MUTU – RSPO/091	N.A
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019, MUTU-RSPO/094	N.A
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049, MUTU-RSPO/092	N.A
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-855480	N.A

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-21	CU-RSPO-855720	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-24	CU-RSPO-855718	N.A
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051, MUTU-RSPO/093	N.A
17	Kempas	Jasin, Melaka	19 May '10	18-May-25	RSPO-PC-00101	N.A
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	N.A
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-24	RSPO 600305	N.A
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	Mill was closed down.
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-25	RSPO 548299	N.A
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-25	CU-RSPO-863078	N.A
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	N.A
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042, BV-RSPO-20170705-01	N.A
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	RSPO 739013	Re-certification conducted on 11/12/2020.
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	RSPO 547123	Mill was closed down.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-23	RSPO 537872	N.A
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	N.A
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-25	RSPO-PC-00116	N.A
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-25	RSPO-PC-00115	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-25	RSPO-PC-00117	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Mill was closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Mill was closed down.

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	N.A
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	N.A
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	N.A
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang.
35	Bintang	Johor	N/A	N/A	N/A	SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.

Legends

Certification Withdrawal

NA - NOT APPLICABLE

Note: There are 2 certificate numbers for some SOUs due to transfer of CB.

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	SGS-RSPO/PC17-00005	N.A
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	2-Jul-23	MUTU-RSPO/027	N.A
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	N.A
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	N.A

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NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	N.A
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	N.A
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	RSPO 744708	Re-certification remote audit conducted on 22/02/2021. License end date 24-May-2021.
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	N.A
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	N.A
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	N.A
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	29-Dec-21	MUTU-RSPO/009	N.A
13		BETUNG		1-April-14	31-Mar-24	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	RSPO 744702	Re-certification remote audit conducted on 20/02/2021. License end date 22-May-2021.
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	15-Mar-17	MUTU-RSPO/015	Cert. discontinued – supply bases extended to Rantau POM
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU-RSPO/020	N.A
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	N.A
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16	30-Nov-21	MUTU-RSPO/008	N.A
19		MANDAH		1 April 2014	31/03/24	MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	N.A
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	N.A

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NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	N.A
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	2-May-23	MUTU-RSPO/026	N.A
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-24	MUTU-RSPO/044	N.A
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	The property was disposed on 25 June 2019 and a official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019.Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019.Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.

Legends

Pending Certification by RSPO EB	Mill down	closed
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NA - NOT APPLICABLE

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SDP - RSPO Certification for Time Bound Plan - NBPOL Operations

As at end Apr 2020

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date
	SOU Name					
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	NA	Guadalcanal Province, Solomon Islands	Certified	18-Mar-11
		Tetere Estate				
		Ngalimbiu Estate				
		Mbalisuna Estate				
		Smallholders – West Zone (83)				
		Smallholders – Central Zone (53)				
		Smallholders – MBA East Zone (59)				
Smallholders – MBE East Zone (37)						
2	Milne Bay Estates (MBE)	Hagita Oil Mill	NA	Milne Bay Province, Papua New Guinea	Certified	15-Feb-18
		Giligili Estate				
		Hagita Estate				
		Waigani Estate				
		Sagarai Estate				
		Padipadi Estate				
		Mariawatte Estate				
		Smallholders - East Gurney Estate (264)				
		Smallholders - West Gurney Estate (229)				
		Smallholders - East Sagarai Estate (157)				
		Smallholders - West Sagarai Estate (221)				
3	Poliamba (POL)	Poliamba Oil Mill		New Ireland Province, Papua New Guinea	Certified	19-Mar-12
		Kara Estate				
		Nalik Estate				
		West Coast Estate				
		Noatsi Estate				
		Madak Estate				
		Smallholders -North Division (615)				
		Smallholders- South Division (868)				
Smallholders -West Division (309)						
4	Ramu Agricultural Industries Ltd (RAIL)	Gusap Mill	NA	Morobe Province, Papua New Guinea	Certified	5-Aug-10
		Gusap East (Gusap) Estate				
		Gusap West (Paddock) Estate				
		Surinam Estate				
		Dumpu Estate				
		Ngaru Estate				
		J Estate (Jephcott) Estate				
		Smallholders - Madang VOPs (71)				

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5	Higaturu Oil Palm (HOP)	Smallholders - Morobe VOPs (253)	NA	Oro Bay Province, Papua New Guinea	Certified	1-Feb-13
		Sangara Oil Mill				
		Mamba Oil Mill				
		Embi Estate				
		Ambogo Estate				
		Sangara Estate				
		Sumbiripa Estate				
		Mamba Estate				
		Sambogo Estate				
		Scheme Smallholder Sorovi Division(2019)				
		Scheme Smallholder Saiho Division(842)				
		Scheme Smallholder Aeka Division (911)				
		Scheme Smallholder Igora Division (1367)				
		Scheme Smallholder Ilimo Division (671)				
6	West New Britain (WNB)	Mosa Oil Mill	NA	Kimbe, West New Britain, Papua New Guinea	Certified	10-Sep-08
		Kumbango Oil Mill				
		Kapiura Mill				
		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				
		Dami Estate				
		Waisisi Estate				
		Kautu Estate				
		Karaus Estate				
		Moroa Estate				
		Bilomi Estate				
		Loata Estate				
		Haella Estate				
		Garu Estate				
		Daliavu Estate				
		Sapuri Estate				
		Malilimi Estate				
		Rigula Estate				
Nomundo Estate						
Navarai / Karato ME /KDC EU Estate						
Volupai / Lotomgam / Natupi / Goruru Estate						
Lolokoru Estate						
Ove Estate						

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7	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Tamare Estate				
		Smallholders LSS Mosa (1822)				
		Smallholders VOP East (1817)				
		Smallholders VOP Central (1964)				
		Smallholders VOP West (1279)				
		Smallholders LSS Kapiura (551)				
		Smallholders VOP Kapiura (850)				
		Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20)				
	Erap Mill	Sep-20	Markham Farms	Certified	Certified on 27 March 2020. There is total area for NPP: 710.30 ha which is currently excluded from the certification scope until the NPP is approved.	
	Munum Estate	Sep-20		Certified		
	Maralumi Estate	Sep-20		Certified		
Erap Estate	Sep-20	Certified				

Legends

Pending Certification

NA - NOT APPLICABLE

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2020 for SOU 1 Sungai Dingin Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2020 for SOU 1 Sungai Dingin Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.23
PKO	1.23

Extraction	%
OER	20.96
KER	5.61

Production	t/yr
FFB Process	257,816.60
CPO Produced	54,048.78
PKO Produced	14,471.52

Land Use	Ha
OP Planted Area	23,605.96
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	23,605.96

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	126,097.19	0.70	9,858.32	0.48	0.00	0.00	135,955.51	0.00
CO ₂ Emission from fertilizer	9,590.88	0.05	805.00	0.08	0.00	0.00	10,395.88	0.00
NO ₂ Emission	5,132.09	0.03	394.93	0.04	0.00	0.00	5,527.03	0.00
Fuel Consumption	1,332.61	0.01	88.96	0.00	0.00	0.00	1,421.56	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-117,719.72	-0.65	-9,332.65	-0.45	0.00	0.00	-127,052.37	0.00

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Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	24,433.05	0.13	1,814.56	0.09	7,294.39	0.00	33,542.00	0.00

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	50,536.42	0.20
Fuel Consumption	100.58	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	50,637.00	0.20

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 (%)	100.00

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100.00
Divert to methane captured (flaring) (%)	100.00
Divert to methane captured (energy generation) (%)	100.00

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit (July 2020 – March 2021)				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	July 2020	20,080.82	3,476.37	23,557.190
2	August 2020	15,605.72	2,496.78	18,102.499
3	September 2020	17,398.43	2,482.40	19,880.861
4	October 2020	13,973.45	1,749.60	15,723.052
5	November 2020	11,247.19	1,389.94	12,637.170
6	December 2020	10,178.92	2,652.34	12,831.263
7	January 2021	11,667.16	3,504.48	15,171.640
8	February 2021	15,989.67	3,985.21	19,974.879
9	March 2021	22,353.80	5,658.68	28,012.481
Total		138,495.16	27,395.80	165,891.035

B. Monthly Records of Certified CPO & PK since the last audit (July 2020 – March 2021)			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	July 2020	4,450.10	1,181.23
2	August 2020	3,455.43	978.50
3	September 2020	3,826.11	964.07
4	October 2020	2,942.37	721.60
5	November 2020	2,286.51	601.64
6	December 2020	2,039.39	510.79
7	January 2021	2,466.48	634.56
8	February 2021	3,362.31	910.16
9	March 2021	4,492.05	1,257.78
Total		29,320.75	7,760.33

C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) (July 2020 – March 2021)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	SDO Port Klang	PO1000000309	500.00	-

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2	SDP KCP Carey	PO1000000310	-	200.00
3	SDO Port Klang	PO1000000309	118.99	200.00
4	SDP KCP Carey	PO1000000310	-	219.80
5	SDO Port Klang	PO1000000309	398.87	-
Total			1,017.86	619.80

D. Records of CPO & PK Sold under other schemes since the last audit (if any) (July 2020 – March 2021)

No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
N/A				

E. Records of CPO & PK Sold as conventional since the last audit (if any) (July 2020 – March 2021)

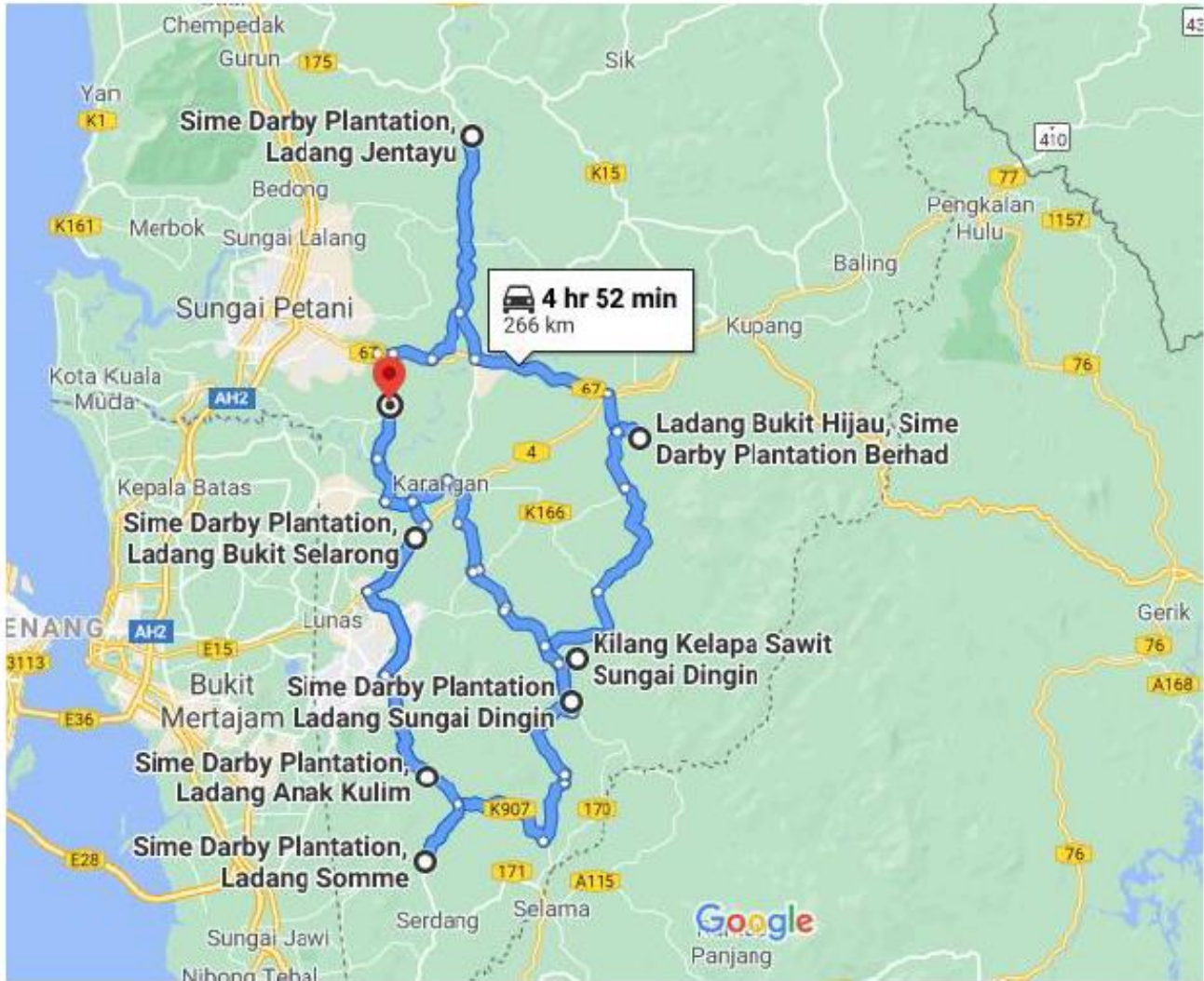
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	FIMA	531.55	-
2	SDOPKR	4,494.68	-
3	PANGKOR	-	498.30
4	PGEO	-	198.73
5	SDOPKR	4,361.49	-
6	SINN HUAT	-	702.74
7	PGEO	-	305.87
8	SDOPKR	4,064.39	-
9	PANGKOR	-	298.10
10	SINN HUAT	-	884.60
11	PGEO	-	90.48
12	SINN HUAT	-	808.66
13	PGEO	-	195.99
14	SDOPKR	4,475.23	-
15	SINN HUAT	-	566.65
16	PGEO	-	107.45
17	SDOPKR	2,826.42	-

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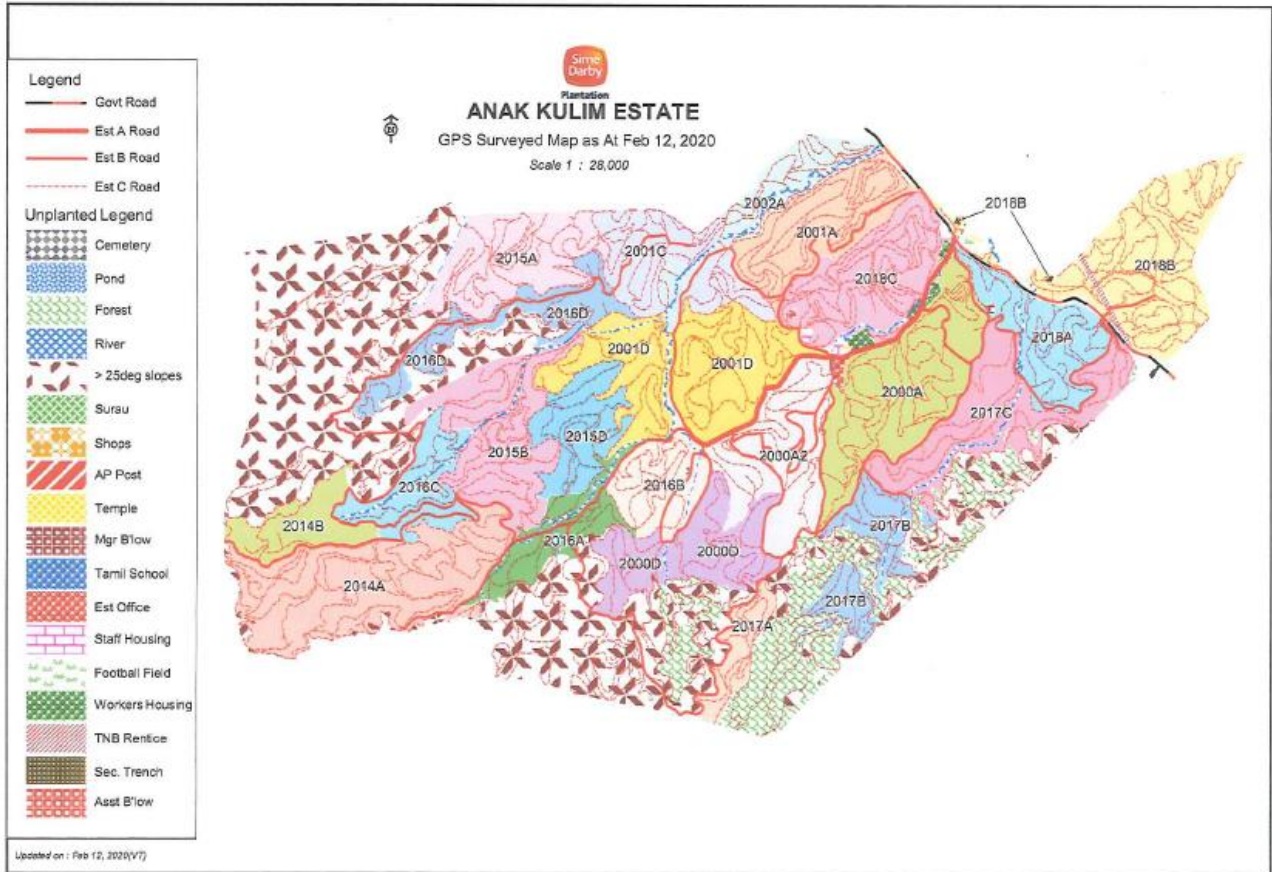
18	SINN HUAT	-	574.36
19	SDOPKR	2,857.26	-
20	SDOPKR	4,198.35	-
21	SINN HUAT	-	553.86
22	SINN HUAT	-	284.62
23	PGEO	-	985.33
Total		27,809.37	7,055.74

F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any) (July 2020 – March 2021)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
N/A			

Appendix E: Location Map of Certification Unit and Supply bases



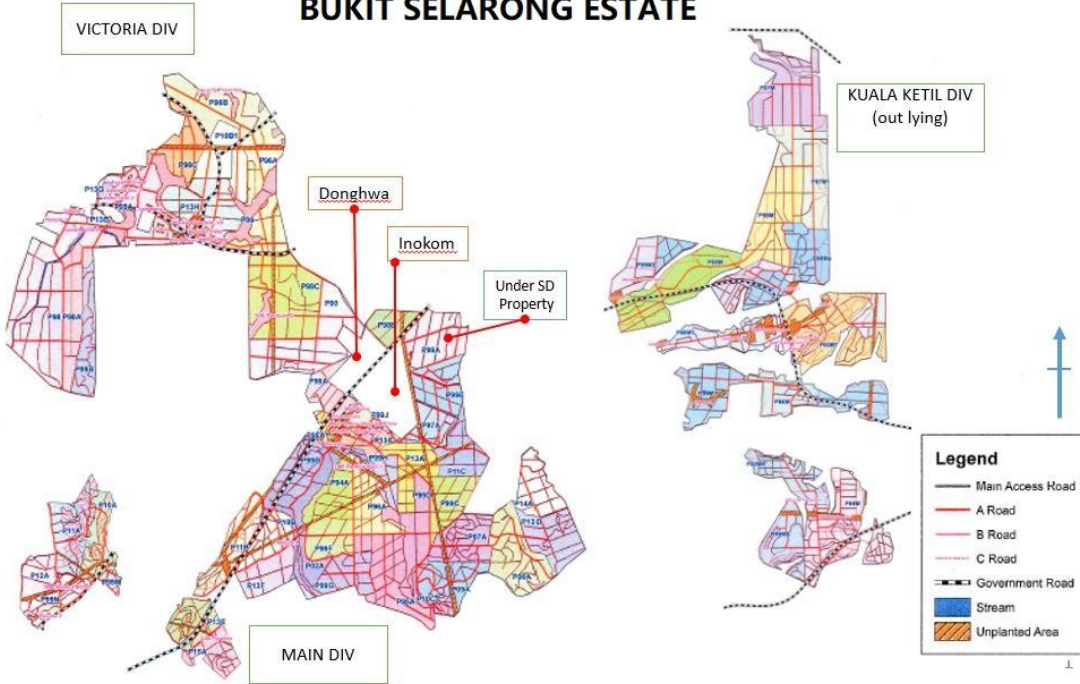
Appendix F: Estate Field Map

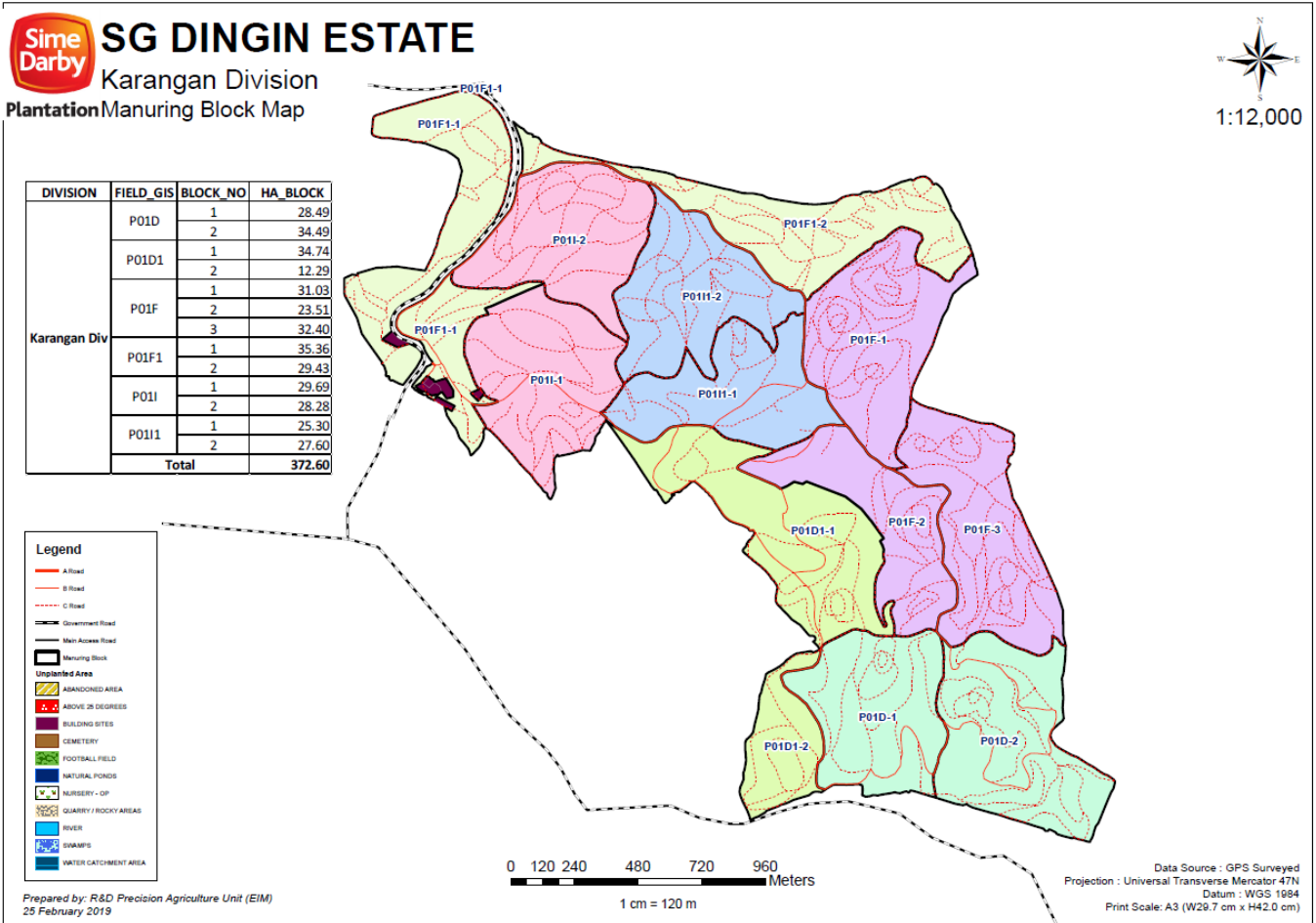


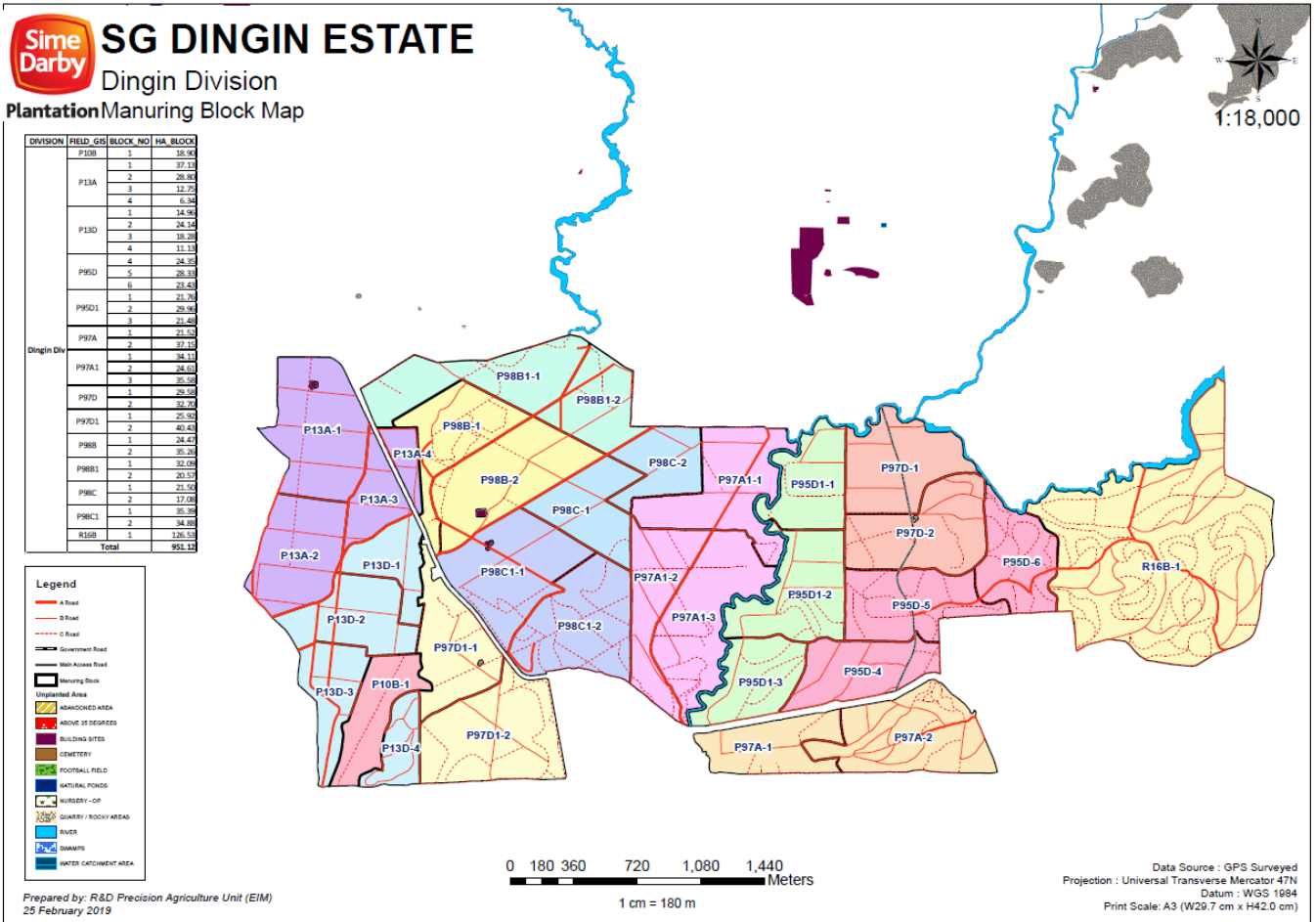
ESTATE MAP



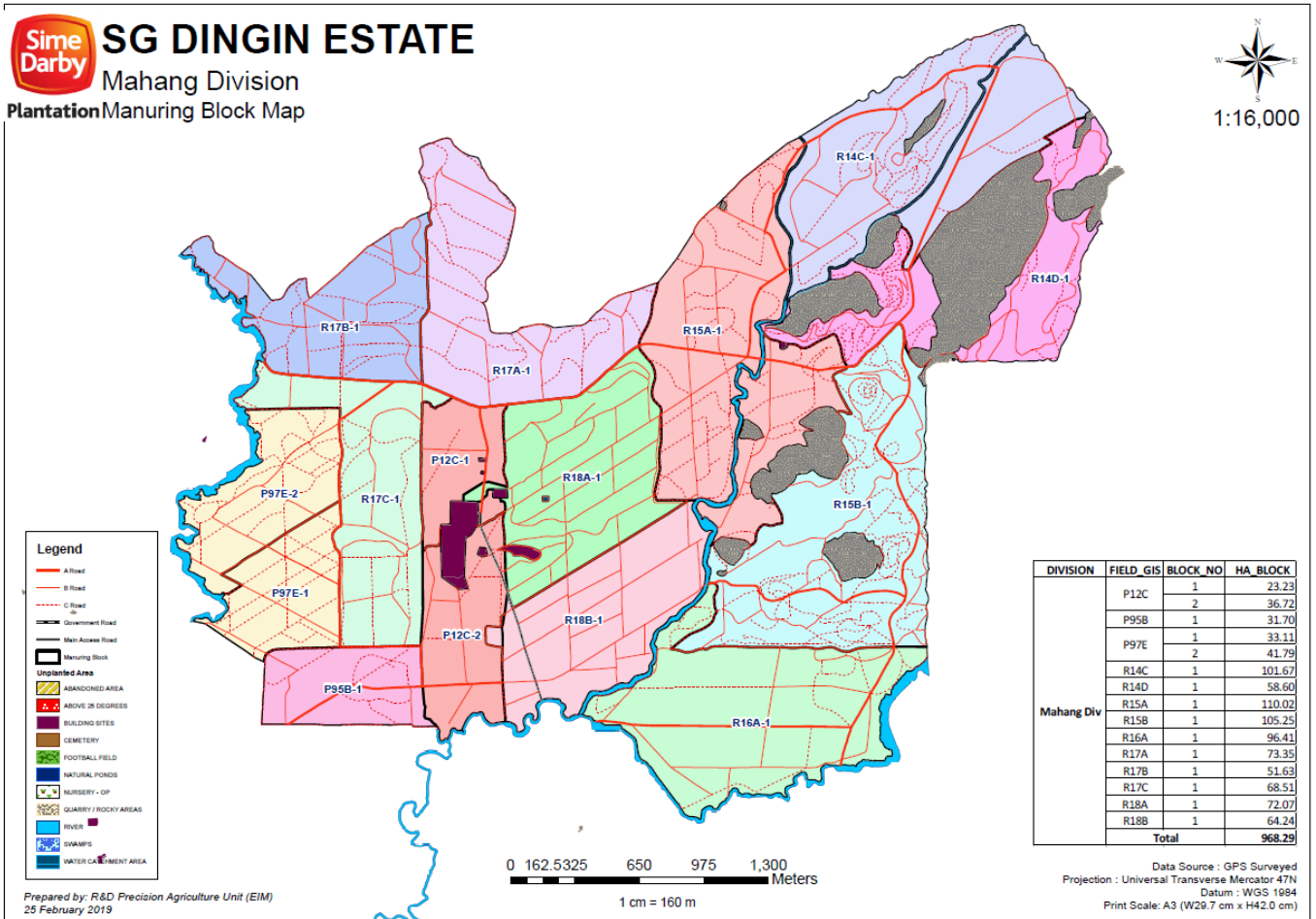
BUKIT SELARONG ESTATE

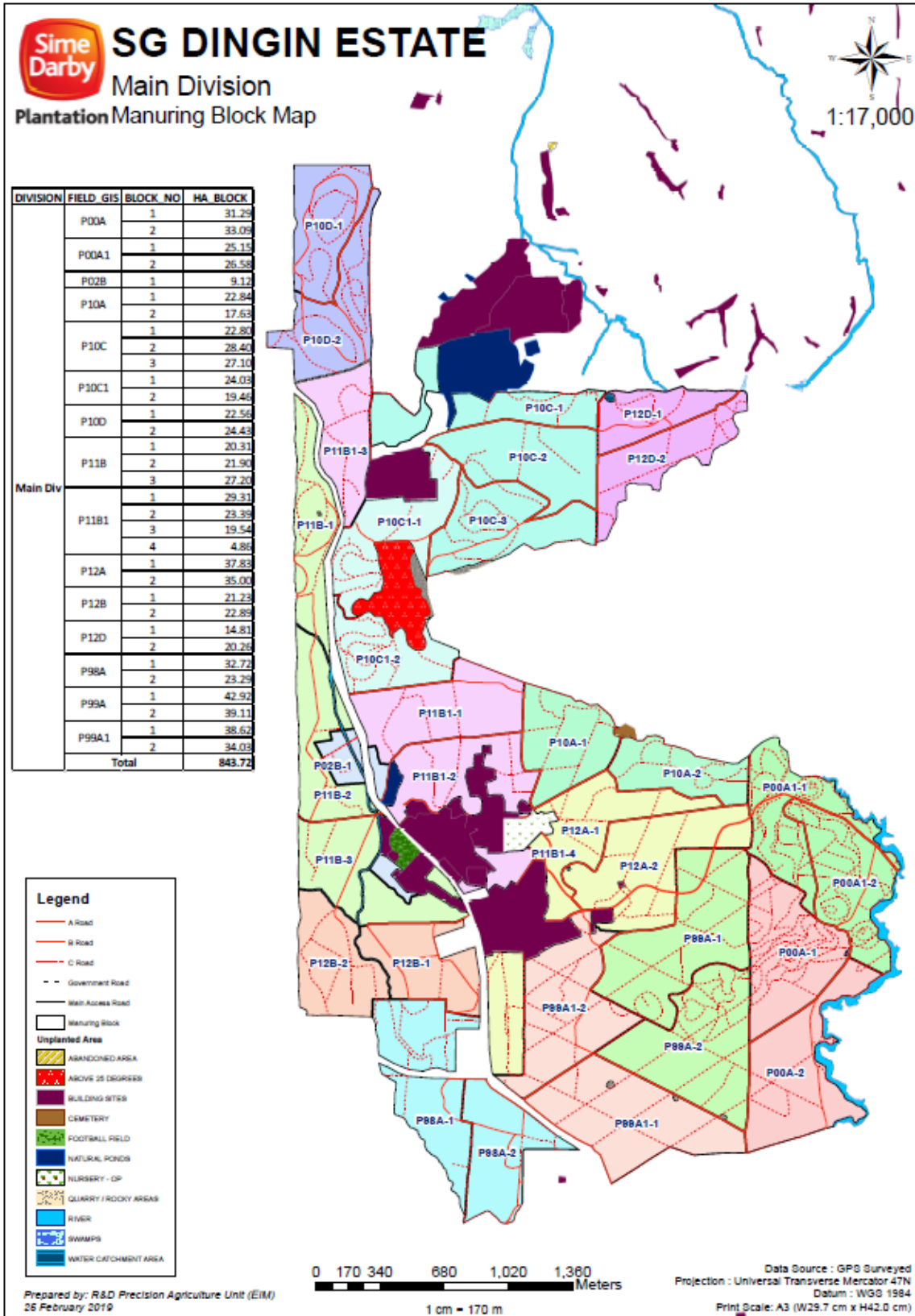




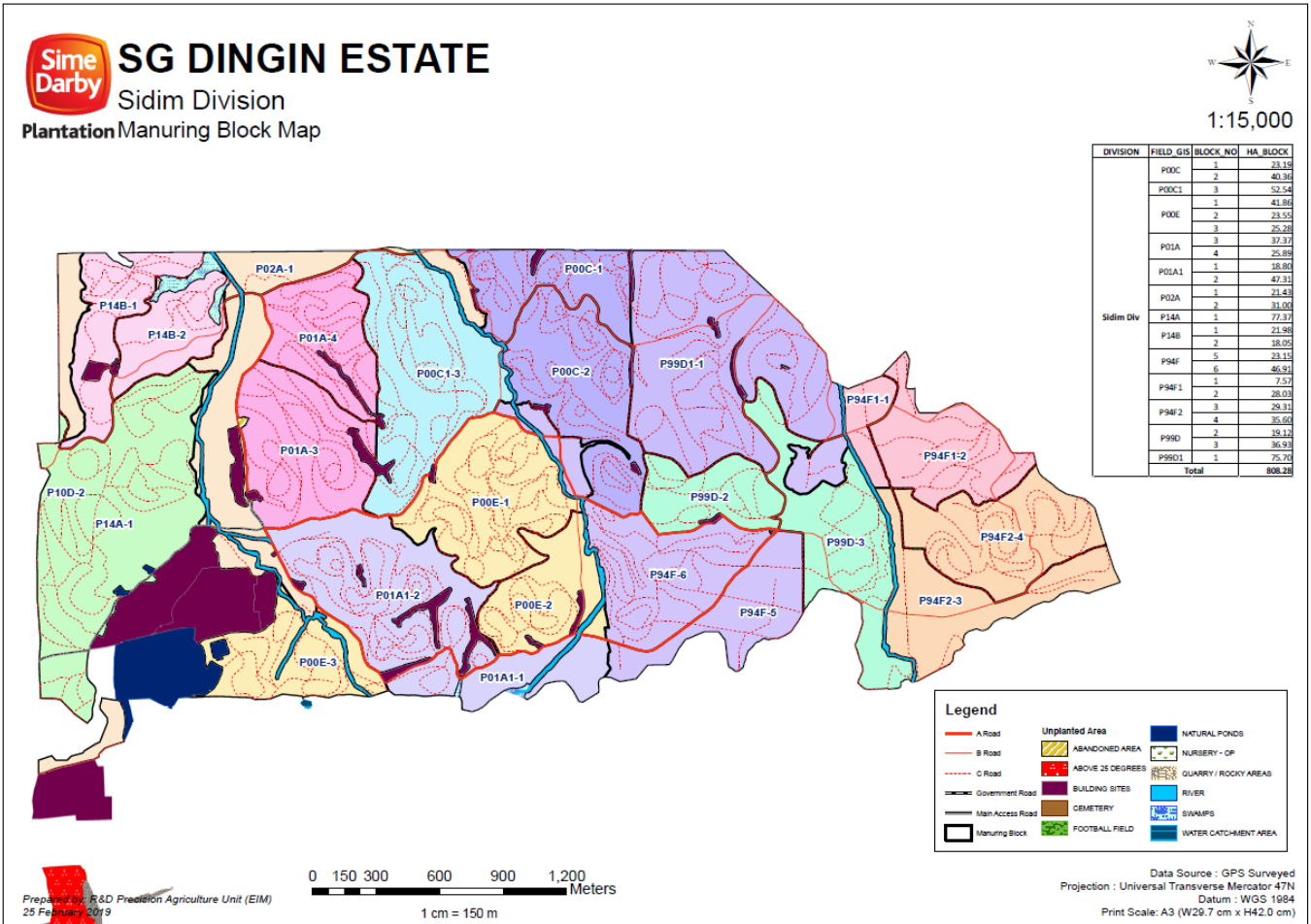


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Appendix G: List of Smallholder Sampled

Not applicable.

Appendix H: 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
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