

**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 / Parent Company Address: Level 10, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 2) - Chersonese Palm Oil Mill Location of Certification Unit: Lot 4647, Jalan Gula, Kuala Gula 34350 Kuala Kurau, Perak, Malaysia
Date of Final Report: 09/12/2022

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Section 1: Scope of the 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 10, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 2) - Chersonese Palm Oil Mill		
Location / Address	Lot 4647, Jalan Gula, Kuala Gula 34350 Kuala Kurau, Perak, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit GSC) Mohd Riza Mohd Arif (Mill Manager)	E-mail	shylaja.vasudevan@simedarbyplantation.com kks.chersonese@simedarbyplantation.com
Telephone	+603 78484379 (Head Office) 019-7914122 & 019-4094121 (Mill)	Facsimile	+603 78484363 (Head Office) N/A (Mill)

2. Certification Information			
Certificate Number	RSPO 590800	Certificate Start Date	05/10/2021
Date of First Certification	05/10/2011	Certificate Expiry Date	04/10/2026
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		

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Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	45 mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682039	MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn. Bhd.	09/01/2023
MSPO 688334	MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3		09/01/2023
MSPO 714137	MSPO Supply Chain Certification: 2018		20/11/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Chersonese Palm Oil Mill	Lot 4647, Jalan Gula, Kuala Gula 34350 Kuala Kurau, Perak, Malaysia	4° 58' 39.04" N	100° 27' 41.00" E
Chersonese Estate	Ladang Chersonese, 34350 Kuala Kurau, Perak	4°59' 24.06" N	100° 27' 13.00" E
Holyrood Estate	Ladang Holyrood, 34100 Selama, Perak	5°07' 27.00" N	100° 42' 36.03" E
Kalumpong Estate	Ladang Kalumpong/Byram, 34300 Bagan Serai, Perak, Malaysia	4° 58' 11.09" N	100° 36' 05.09" E
Tali Ayer Estate	Ladang Tali Ayer, 34300 Bagan Serai, Perak	5°03' 30.02" N	100° 31' 20.09" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Chersonese Estate	2,870.42	25.87	397.43	3,293.72	88%
Holyrood Estate	1,222.28	12.19	98.27	1,332.74	91.71
Kalumpong Estate	2,529.28	21.09	166.43	2,716.80	93.10
Tali Ayer Estate	3,109.98	24.24	647.74	3,781.96	80.51
Total	9,731.96	83.39	1,309.87	11,125.22	88.33

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Note:

Chersonese Estate : Reduce 156.35ha from total planted and add at infrastructure & other due Oil Palm convert to Coconut planting
Tali Ayer Estate : Increase 86.02ha at total planted, reduce 60.16ha at infrastructure & other and total area increase 25.86 based survey conducted by PAU on 17/11/2021.

6. Plantings & Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Chersonese Estate	648.20	1,891.75	330.47	-	2,222.22	648.20
Holyrood Estate	154.32	910.01	157.95	-	1,164.58	57.70
Kalumpong Estate	736.28	526.56	1,266.44	-	1,793.00	736.28
Tali Ayer Estate	214.31	1,223.67	1,672.00	-	2,895.67	214.31
Total (ha)	1,753.11	4,551.99	3,426.86	-	8,075.47	1,656.49

Note: The area for immature area increased when comparing to the previous audit report due to the estates continuously conducted replanting

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2021 – Sep 2022)	Actual (Jul 2021 – Jun 2022)		Forecast (Oct 2022 – Sep 2023)
		Previous license period (Jul 2021 – Apr 2022)	Current license period (May 2022 – Jun 2022)	
Chersonese Estate	56,221.52	34,564.06	6,931.06	52,346.00
Holyrood Estate	30,783.93	20,385.58	3,819.07	27,526.00
Kalumpong Estate	47,024.57	31,599.40	6,444.13	45,544.00
Tali Ayer Estate	64,531.28	33,297.93	5,693.48	46,970.00
Total	198,561.30	142,734.71		172,386.00

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2021 – Sep 2022)	Actual (Jul 2021 – Jun 2022)		Forecast (Oct 2022 – Sep 2023)
		Previous license period (Jul 2021 – Apr 2022)	Current license period (May 2022 – Jun 2022)	
Bukit Hijau Estate		75.72	0.00	
Bkt Selarong Estate		139.19	31.90	
Jentayu Estate		155.50	18.66	

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Padang Buloh Estate		221.37	225.95	
Somme Estate		194.13	181.16	
Total		1,243.58		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2021 – Sep 2022)	Actual (Jul 2021 – Jun 2022)		Forecast (Oct 2022 – Sep 2023)
		Previous license period (Jul 2021 – Apr 2022)	Current license period (May 2022 – Jun 2022)	
Kupang Estate	35,700.00	137.72	295.59	48,300.00
CWJ Smart		7,776.12	5,497.20	
Ldg Sg Ahning		366.75	578.15	
Ldg Sg Tekai		275.83	563.44	
Soon Lee		60.12	0.00	
Ldg Tanah Merah		255.78	517.65	
Tang Tatt		1,706.86	302.41	
Total	35,700	18,333.62		48,300

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	July 2021	15,623.73	0.00	15,623.73
2	August 2021	15,455.70	0.00	15,455.70
3	September 2021	13,434.11	0.00	13,434.11
4	October 2021	12,343.30	995.04	13,338.34
5	November 2021	10,107.93	309.83	10,417.76
6	December 2021	9,385.99	26.03	9,412.03
7	January 2022	8,911.48	190.05	9,101.53
8	February 2022	10,316.03	2,555.62	12,871.65
9	March 2022	11,918.41	2,637.53	14,555.94
10	April 2022	13,136.20	3,865.07	17,001.27
11	May 2022	11,153.10	4,026.95	15,180.05
12	June 2022	12,192.31	3,727.50	15,919.81
	TOTAL	143,978.29	18,333.62	162,297.32

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Note: The volume of FFB from certified supply bases is the result of the combination from own certified estates and from other certified mills and estates

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Oct 2021 – Sep 2022)	Actual (Jul 2021 – Jun 2022)		Forecast (Oct 2022 – Sep 2023)
	Previous license period (Jul 2021 – Apr 2022)	Current license period (May 2022 – Jun 2022)	
FFB	FFB		FFB
198,561.30 mt	120,632.88 mt	23,345.41 mt	172,386.00 mt
	TOTAL	143,978.29 mt	
CPO (OER: 20.99 %)	CPO (OER: 20.84 %)		CPO (OER: 20.77 %)
44,308.52 mt	25,690.56 mt	4,317.73 mt	35,804.57 mt
	TOTAL	30,008.29 mt	
PK (KER: 5.76 %)	PK (KER: 5.36 %)		PK (KER: 5.39 %)
12,160.42 mt	6,489.04 mt	1,230.13 mt	9,291.61 mt
	TOTAL	7,719.17 mt	
Note:			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	July 2021	3,183.86	864.21
2	August 2021	3,245.10	928.54
3	September 2021	2,861.62	702.91
4	October 2021	2,541.06	607.26
5	November 2021	2,054.12	491.24
6	December 2021	1,908.13	532.71
7	January 2022	1,840.17	451.66
8	February 2022	2,424.41	502.33
9	March 2022	2,916.61	685.25
10	April 2022	2,715.48	722.93
11	May 2022	2,150.09	573.32
12	June 2022	2,167.64	656.81
	TOTAL	30,008.29	7,719.17

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11. Summary of Actual Volume sold					
Current License period (May 2022 – Jun 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	318.35	0.00	0.00	6,078.03	6,396.38
PK (MT)	758.21	0.00	0.00	811.91	1,570.12
Credits	0.00	0.00	0.00	0.00	0.00
Previous License period (Jul 2021 – Apr 2022)					
CPO (MT)	6,655.32	0.00	0.00	12,426.84	19,082.16
PK (MT)	4,722.31	0.00	0.00	1,096.74	5,819.05
Credits	0.00	0.00	0.00	0.00	0.00

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

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	X	TR-78204b87-d50f	3.98	0.00
2	X	TR-81d4e94f-d642	39.28	0.00
3	X	TR-9cca492a-0455	39.16	0.00
4	X	TR-dabfab6a-91a5	40.16	0.00
5	X	TR-341992a3-2074	39.98	0.00
6	X	TR-ef4b61d9-00ee	38.99	0.00
7	X	TR-f77732f7-e195	39.16	0.00
8	X	TR-4d5b6fcb-eb18	39.23	0.00
9	X	TR-74d88538-80d8	39.35	0.00
10	X	TR-69b48905-2dfb	39.59	0.00
11	X	TR-f096fc6e-cb0e	40.16	0.00
12	X	TR-636e82e3-562c	38.99	0.00
13	X	TR-4598cc0a-3d0d	41.01	0.00
14	X	TR-b5e227fe-6a17	40.34	0.00
15	X	TR-28120ea0-dd65	39.00	0.00
16	X	TR-688425ca-2ba1	41.01	0.00
17	X	TR-59ad48ac-014a	40.34	0.00
18	X	TR-ddd50912-51c6	39.00	0.00
19	X	TR-4efb6b8f-a989	39.85	0.00

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20	X	TR-7520f8a0-6dd8	41.09	0.00
21	X	TR-62efbd60-1e90	39.21	0.00
22	X	TR-9c16e46c-4470	39.85	0.00
23	X	TR-66bffb36-fde5	41.09	0.00
24	X	TR-22667cdc-4beb	39.55	0.00
25	X	TR-29f0bf11-0505	39.12	0.00
26	X	TR-7da74964-5855	39.55	0.00
27	X	TR-1e95b3d3-c399	39.12	0.00
28	X	TR-0601a9d2-5fc4	200.00	0.00
29	X	TR-f66b811c-bb29	110.43	0.00
30	X	TR-88348940-4cc7	40.22	0.00
31	X	TR-7ff99426-e707	39.06	0.00
32	X	TR-2e55ff01-6876	39.07	0.00
33	X	TR-ae7e6c02-ea57	40.00	0.00
34	X	TR-1cd95943-d54a	40.01	0.00
35	X	TR-a91e7bf9-81a5	40.38	0.00
36	X	TR-884e89f0-b1dd	40.26	0.00
37	X	TR-24b00b44-4145	39.49	0.00
38	X	TR-57109815-7a9f	39.68	0.00
39	X	TR-8b74573c-e791	40.38	0.00
40	X	TR-fc33f58e-850a	40.26	0.00
41	X	TR-491e69d2-1646	39.49	0.00
42	X	TR-2661a959-603f	39.68	0.00
43	X	TR-11a2be95-b34e	39.84	0.00
44	X	TR-341a9017-00c8	39.44	0.00
45	X	TR-51b1bb31-1fbd	39.70	0.00
46	X	TR-57f45545-effd	39.81	0.00
47	X	TR-65d4cd73-8feb	39.93	0.00
48	X	TR-ab05159a-5df8	39.62	0.00
49	X	TR-e2b74113-be36	40.20	0.00
50	X	TR-601f1b5f-316a	40.83	0.00
51	X	TR-05e43719-ccc9	40.13	0.00
52	X	TR-66c96876-740f	39.77	0.00
53	X	TR-05ec03d9-b90b	39.49	0.00
54	X	TR-c8f022a4-d13f	40.22	0.00
55	X	TR-46d20d98-bffd	39.90	0.00

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56	X	TR-a980d35c-994f	39.80	0.00
57	X	TR-f34d9143-cf76	39.71	0.00
58	X	TR-c3a8d59c-bf2c	200.00	0.00
59	X	TR-7be7f13e-0ffb	118.35	0.00
60	X	TR-ba4e6dfe-df71	39.04	0.00
61	X	TR-01abb828-46d8	39.60	0.00
62	X	TR-8994617a-3f3f	40.51	0.00
63	X	TR-b848e09e-0412	39.87	0.00
64	X	TR-d2afa98e-7b6d	39.70	0.00
65	X	TR-f920e535-49c2	39.75	0.00
66	X	TR-9855aa63-66dc	40.51	0.00
67	X	TR-f11e8589-004f	40.40	0.00
68	X	TR-0413f19a-08b7	40.84	0.00
69	X	TR-f9db63dd-f55b	40.94	0.00
70	X	TR-df819b60-4476	39.88	0.00
71	X	TR-79249d52-e9a6	38.39	0.00
72	X	TR-4ebdd6fc-7179	39.68	0.00
73	X	TR-fc672805-658e	38.84	0.00
74	X	TR-f38949df-92db	39.80	0.00
75	X	TR-57230892-8444	39.82	0.00
76	X	TR-cd653ca8-a1a4	38.77	0.00
77	X	TR-b62f6276-2fb5	80.28	0.00
78	X	TR-15f726f7-d18b	39.62	0.00
79	X	TR-1817455c-7bea	118.60	0.00
80	X	TR-33bb4399-680b	39.26	0.00
81	X	TR-f080b1c3-5bff	282.77	0.00
82	X	TR-9f262b0f-7867	477.40	0.00
83	X	TR-5804b9fa-b476	238.48	0.00
84	X	TR-61eb4d4d-610a	197.76	0.00
85	X	TR-e63232cf-4119	200.79	0.00
86	X	TR-845120c7-281a	79.41	0.00
87	X	TR-be2d521f-4980	160.66	0.00
88	X	TR-7137ab03-f7b4	714.74	0.00
89	X	TR-f7b40950-3cf7	163.00	0.00
90	X	TR-531c15fc-a4b0	39.98	0.00
91	X	TR-c00def0f-8432	39.94	0.00

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92	X	TR-3bc16a86-690d	40.79	0.00
93	X	TR-4067dc5b-b962	40.95	0.00
94	X	TR-7f3080fb-5936	39.73	0.00
95	X	TR-9a9981b4-fb85	40.49	0.00
96	X	TR-5fd59423-d6b7	39.90	0.00
97	X	TR-8c654133-cd9c	40.68	0.00
98	X	TR-25160484-3aa1	39.80	0.00
99	X	TR-3b04ada9-88a2	150.00	0.00
100	X	TR-bcea0a62-1cd7	150.00	0.00
101	X	TR-1b6bc216-919e	59.99	0.00
102	X	TR-7e33c6e2-255c	0.00	300.00
103	X	TR-183350d3-db77	0.00	167.37
104	X	TR-e60b213f-1439	0.00	74.77
105	X	TR-2c09dfb7-6dfb	0.00	400.00
106	X	TR-66de23c3-ecfa	0.00	125.00
107	X	TR-686b7641-8a5f	0.00	150.00
108	X	TR-e3eb1a00-fbf1	0.00	105.23
109	X	TR-2f99ec8f-8237	0.00	39.43
110	X	TR-b3dce24e-5ccc	0.00	350.00
111	X	TR-be6940f3-d13a	0.00	250.00
112	X	TR-a8c4f2e6-4acd	0.00	23.53
113	X	TR-bab76d10-6f1b	0.00	97.41
114	X	TR-538ccbd3-5156	0.00	2.59
115	X	TR-fc93c264-f2f4	0.00	100.00
116	X	TR-1e3a2ebe-d330	0.00	26.47
117	X	TR-a3e63adf-b472	0.00	100.00
118	X	TR-fb513e94-f4c9	0.00	155.51
119	X	TR-50453a77-1498	0.00	450.00
120	X	TR-6fedb192-dcd7	0.00	300.00
121	X	TR-fc1f0c8d-6e99	0.00	300.00
122	X	TR-07cb6461-e752	0.00	200.00
123	X	TR-29ae6eae-86c5	0.00	13.01
124	X	TR-7399fe45-8075	0.00	40.13
125	X	TR-72b1546b-864f	0.00	350.00
126	X	TR-46b07b3f-5560	0.00	11.81
127	X	TR-e1a94800-8383	0.00	8.27

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128	X	TR-d9686803-03b5	0.00	150.00
129	X	TR-a6fe73b1-eac9	0.00	20.00
130	X	TR-8879712a-0a8a	0.00	300.00
131	X	TR-7f61fc66-6fed	0.00	6.19
132	X	TR-fb3b8cbf-c045	0.00	65.97
133	X	TR-72fe5739-bfdf	0.00	64.93
134	X	TR-2df703c0-7356	0.00	20.00
135	X	TR-033992b1-7fde	0.00	300.00
136	X	TR-15eba7df-68fa	0.00	350.00
137	X	TR-7f823662-4a61	0.00	32.63
138	X	TR-723742ef-5b9f	0.00	30.27
TOTAL			6,973.67	5,480.52

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

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	A	6,208.20	520.90
2	B	6,405.50	730.30
3	C	5,891.17	657.45
TOTAL		18,504.87	1,908.65

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
	N/A	N/A	N/A
TOTAL			N/A

12. Independent Smallholders Certified Tonnage (MT) / Volume			
	Estimated last year (Not applicable)	Actual (Not applicable)	Forecast (Not applicable)

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Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
1	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Not applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Not applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

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

Note:

Section 2: Assessment Process

Certification Body:

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

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **25 – 29/07/2022**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **21/10/2022**. The audit programs are included in Section 2.3.

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

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

Meetings were held with stakeholders to seek their views on the performance of the 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 3.4.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (RC2)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Chersonese Palm Oil Mill	X	X	X	X	X
Chersonese Estate	X	X	X	X	X
Holyrood Estate	X	X	X	X	X
Kalumpong Estate	X	X	X	X	X
Tali Ayer Estate	X	X	X	X	X

Tentative Date of Next Visit: July 3, 2023 - July 7, 2023

Total Number of Mandays: 15 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Muhammad Fadzli Masran (MFM)	Team Leader	<p>Education: He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers’ welfare, workers’ occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018, endorsed RSPO Lead Auditor Course in July 2018, MSPO Lead Auditor Course in October 2018, endorsed RSPO Supply Chain Certification training course in January 2019, MSPO Supply Chain Certification System (SCCS) Auditor training Course (MPOCC Endorsed), CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course in April 2019, HCV and GIS Training in November 2019 and SMETA Requirements Training in April 2021.</p> <p>Language proficiency:</p>

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		<p>Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p>During the assessment he covered mills and estates best practices, Legal Requirements, land & Legal issue environmental and HCV, Environmental Aspect impact, Environmental Management plan, , GHG and RSPO supply chain requirements.</p>
Valence (VSH)	Shem	<p>Team Member</p> <p>Education:</p> <p>Holds BTech (Hons) Bachelor Degree in Industrial Technology, University of Science Malaysia</p> <p>Work Experience:</p> <p>He has experienced 9 years working in oil palm plantation industry. He also has experience in Management system auditing since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS, MSPO and SMETA.</p> <p>Training attended:</p> <p>He has completed ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Assessor Course, MSPO Awareness Training, ISO 45000 Lead Auditor Course, SMETA Auditor training, HCV-HCS training, and RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course</p> <p>Language proficiency:</p> <p>Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p>During this assessment, he assessed on the aspects of Occupation Health Safety requirement, HIRARC, training, management plan, good agriculture practice, GHG and RSPO supply chain requirements.</p>
Rahayu (RZ)	Zulkifli	<p>Team Member</p> <p>Education:</p> <p>Holds a Law Degree from John Moores University, Liverpool, United Kingdom</p> <p>Work Experience:</p> <p>She was a practicing lawyer before she joined several public listed companies as Head of Legal Department. In 2003 she joined an environmental NGO as a turtle conservationist, and in 2014 joined RSPO as Dispute Settlement Facility Manager. Rahayu is now a freelance auditor specializing in social aspects of the RSPO and MSPO standards, with audit experiences in Malaysia, Indonesia and Ghana. Additionally, Rahayu also assists in HCV assessments (in particular HCV 5 & 6), as well as carry out Social Impact Assessments. Rahayu is also a trained and certified Mediator.</p> <p>Training attended:</p> <p>Completed the Endorsed RSPO P&C Lead Auditor course in 2014, ISO 14001 Lead Auditor course in 2016, the MSPO Awareness Training in 2016, and Endorsed RSPO P&C Lead Auditor Refresher course in 2018.</p> <p>Language proficiency:</p> <p>Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p>During this assessment, he assessed on the aspects of Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation</p>

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N/A	Peer Reviewer	Education: N/A Work Experience: N/A Training attended: N/A
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Accompanying Persons:

Name	Role
Hafriazhar Mohd Mokhtar	Qualifying Reviewer for Valence Shem Education: Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia Work Experience: He has 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before auditing. In summary, his started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies. Training attended: He has completed Social Auditing & SMETA Training, HCV & HCS Introductory Training, ISO 45001 LA Training, MSPO LA Training, Endorsed RSPO SCCS LA Training, Endorsed RSPO P&C LA Training, ISO 9001 LA Training, ISO 50001 LA Training, and ISO 14001 LA Training

2.3 Assessment Plan

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

Onsite Assessment

Date	Time	Subjects	MFM	VS	RZ
Sunday, 24/07/2022	PM	Auditors travel to and check in at Hotel.	√	√	√
Monday, 25/07/2022 Chersonese POM	0900 - 0930	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) 	√	√	√

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Date	Time	Subjects	MFM	VS	RZ
	0930 - 1300	<p>Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.</p> <p>Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)</p>	√	√	√
	1300 - 1400	Lunch break	√	√	√
	1400 - 1630	<p>Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.</p> <p>RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.</p>	√	√	√
	1630 - 1700	Interim closing briefing	√	√	√
Tuesday, 26/07/2022 Chersonese Estate	0900 - 1300	<p>Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.</p> <p>Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)</p>	√	√	√
	1300 - 1400	Lunch break	√	√	√
	1400 - 1630	<p>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.)</p>	√	√	√
	1630 - 1700	Interim closing briefing	√	√	√

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Date	Time	Subjects	MFM	VS	RZ
Wednesday 27/07/2022 Tali Ayer Estate	0900 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√ √
	1300 - 1400	Lunch break	√	√	√
	1400 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1630 - 1700	Interim closing briefing	√	√	√
Thursday 28/07/2022 Holyrood Estate	0900 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√ √
	1300 - 1400	Lunch break	√	√	√
	1400 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1630 - 1700	Interim closing briefing	√	√	√

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Date	Time	Subjects	MFM	VS	RZ
Friday 29/07/2022 Kalumpang Estate	0900 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	1230 - 1400	Lunch break and Friday Pray	√	√	√
	1400 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1630 - 1700	Audit team discussion & preparation for closing meeting	√	√	√
	1700 - 1730	Closing briefing	√	√	√

Major NC Close out visit

Date	Time	Subjects	MFM
Wednesday 20/10/2022	PM	Auditor Travelling to Taiping	√
Thursday 21/10/2022	09.00 – 09.15	Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√
	09.00 – 12.00	Verification on previous Major NC: 1. 2230351-202207-M1 2. 2230351-202207-M2 Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	√
	12.00 – 13.00	Closing Meeting	√
	13.00	Audit Team travel back	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	<p>Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>On 16/01/2020, Sime Darby Plantation Berhad under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p>http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</p>	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>Generally all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As 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 and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management.</p>	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	<p>There is no new acquisitions as per the latest TBP since 2021.</p>	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	<p>Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	Complied
Have there been any changes to the time-bound plan since the last audit (both new	<p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill -</p>	Complied

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<p>acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>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 Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019.</p> <p>PT Guthrie Eeconina: 890.98 Ha from Sg Jernih Estate still under Land legalisation process - Process Kadastral.</p> <p>Sg Jernih estate and KKPA was separated in 2022 and recorded separately.</p> <p>Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</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: www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</p> <p>ACOP 2021 has been cross-referenced as below: https://document.rspo.org/2021/Sime_Darby_Plantation_Berhad_ACOP2021.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>Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>

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implementation of the plan? If yes a Major non-compliance shall be raised		
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification</p> <ol style="list-style-type: none"> 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsidiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd 3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd 4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited 5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms 6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png 7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png 	Complied

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	<p>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate</p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate</p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm</p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment</p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1</p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment</p> <p>Management units for 11 – 13 above were disposed.</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 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. . As of July 2022, 16 LUCAs review completed with remaining 8 concept note required, 7 concept note approved by RSPO and 1 Concept note endorsed.</p>	<p>Complied</p>

Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV Area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted in August 2021. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No any critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company. There is no scheme smallholders and/ or out growers include in the scope of certification.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

Approved Time Bound Plan

SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Sungai Dingin	Sungai Dingin Oil Mill	-	Karangan, Kedah	Certified	12/08/2011	-
		Anak Kulim Estate					
		Sungai Dingin Estate					
		Somme Estate					
		Bukit Selarong Estate					
		Padang Buluh Estate					
		Bukit Hijau Estate					
		Jentayu Estate					
2	Chersonese	Chersonese Oil Mill	-	Kuala Kurau, Perak	Certified	05/10/2011	-
		Chersonese Estate					
		Kalumpong Estate					
		Tali Ayer Estate					
		Holyrood Estate					
3	Elphil	Elphil Oil Mill	-	Sungai Siput, Perak	Certified	16/08/2011	-
		Kamuning Estate					
		Elphil Estate					
		Kinta Kellas Estate					
4	Flemington	Flemington Oil Mill	-	Teluk Intan, Perak	Certified	05/10/2011	-
		Flemington Estate					
		Bagan Datoh Estate					

		Sabak Bernam Estate					
		Sg. Samak Estate					
5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan, Perak	Certified	03/03/2011	-
		Selaba Oil Mill					
		Seri Intan (+ Selaba) Estate					
		Sabrang Estate					
		Sogomana Estate					
		Sg. Wangi Estate					
		Bikam Estate					
		Cluny (+ Bedford) Estate					
6	Tennamaram	Tennamaram Oil Mill	-	Bestari Jaya, Selangor	Certified	03/03/2011	-
		Tennamaram Estate					
		Sungai Buluh Estate					
		Bukit Talang Estate					
7	Bukit Kerayong	Bukit Kerayong Oil Mill	-	Kapar Selangor	Certified	15/04/2011	-
		Bukit Kerayong Estate					
		Bukit Cheraka Estate					
		Elmina Estate					
8	East	East Oil Mill	-	Carey Island, Selangor	Certified	19/05/2011	-
		East Estate					
		Sepang Estate					
		Dusun Durian Estate					
9	West	West Oil Mill	-	Carey Island, Selangor	Certified	19/05/2011	-
		West Estate					

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10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	07/07/2011	-
		Bukit Puteri Estate					
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	07/07/2011	Jentar Estate has merged with Kerdau Estate and reported to the CB in March/April 2021.
		Kerdau Estate					
		Jentar Estate					
		Mentakab Estate					
		Chenor Estate					
Sg Mai Estate							
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	07/07/2011	-
		Jabor Estate					
13	Labu	Labu Oil Mill	-	Nilai, Negeri Sembilan	Certified	30/12/2011	New Labu Estate has become a division of Labu Estate.
		Labu Estate					
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	19/05/2010	-
		Tanah Merah Estate					
		Bukit Pelandok Estate					
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18/02/2014	Siliao Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong Estate					
		Sengkang Estate					
		Bradwall Estate					
		PD Lukut Estate					
		Tampin Linggi Estate					
		Sg. Bahru Estate					
Salak Estate							
16	Kok Foh	Kok Foh Oil Mill	-		Certified	07/07/2011	

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		Muar River Estate		Bahau, Negeri Sembilan			Sg. Gemas Estate has now been merged into Sg. Senarut Estate.
		Sg. Senarut Estate					
		Sg. Gemas Estate					
		Kok Foh Estate					
		Bukit Pilah Estate					
		St. Helier Estate					
		Sungai Sabaling Estate					
		Pertang Estate					
17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	19/05/2010	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas)
		Kempas Estate					
		Tangkah Estate					
		Kemuning Estate					
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	-	Jasin, Melaka	Certified	05/10/2011	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas) Welch Estate, previously from SOU 19 (Pagoh) is now part of SOU 18 (Diamond Jubilee)
		Serkam Estate					
		Diamond Jubilee Estate					
		Bukit Asahan Estate					
19	Pagoh	Pagoh Oil Mill	-	Muar, Johor	Certified	28/1/2014	-
		Pagoh Estate					
		Welch Estate					
		Lanadron Estate					
		Pengkalan Bukit Estate					
20	Chaah	Chaah Oil Mill	-	Chaah, Johor	Certified	18/11/2010	-
		Chaah Estate					
		Sg. Simpang Kiri Estate					

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		North Labis Estate					
21	Gunung Mas	Gunung Mas Oil Mill	-	Kluang, Johor	Certified	19/05/2010	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bkt Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
		Gunung Mas Estate					
		Kempas Klebang Estate					
		Bukit Paloh Estate					
		Yong Peng Estate					
22	Bukut Benut	Bukit Benut Oil Mill	-	Kluang, Johor	Certified	05/11/2011	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate					
		Lambak Elaeis Estate					
		CEP Nyior Estate					
23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-Layang, Johor	Certified	11/04/2011	-
		Ulu Remis Estate					
		Cenas Estate					
		Bukit Badak Estate					
		Tun Dr. Ismail Estate					
		Pekan Estate					
		Sembrong Estate					
24	Hadapan	Hadapan Oil Mill	-	Layang-Layang, Johor	Certified	29/3/2011	-
		Sri Pulai Estate					
		Kulai Estate					
		Layang Estate					
		CEP Renggam Estate					
26	Sandakan Bay	Sandakan Bay	-	Sandakan, Sabah	Certified	01/10/2008	-
		Tun Tan Siew Sin					

		Tunku Estate					
		Tigowis Estate					
		Sentosa Estate					
		Segaliud Estate					
27	Melalap	Melalap Oil Mill	-	Tenom, Sabah	Certified	21/1/2011	-
		Melalap Estate					
		Sapong Estate					
28	Binuang	Binuang Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-
		Binuang Estate					
		Sungang Estate					
		Tingkayu Estate					
		Jeleta Bumi Estate					
29	Giram	Giram Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-
		Giram Estate					
		Mostyn Estate					
30	Merotai	Merotai Oil Mill	-	Tawau, Sabah	Certified	16/1/2009	-
		Merotai Estate					
		Imam Estate					
		Tiger Estate					
		Table Estate					
31	Layang	Lavang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Lavang Estate					
		Rasan Estate					
		Belian Estate					

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		Kelida Estate					
		Lavang (Special) Estate					
		Pekaka Estate					
		Ruai Estate					
		Dulang Estate					
		Charquest Estate					
		Paroh Estate					
32	Rajawali	Rajawali Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Rajawali Estate					
		Samudera Estate					
		Semarak Estate					
		Bayu Estate					
33	Derawan	Derawan Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Derawan Estate					
		Sahua Estate					
		Takau Estate					
		Damai Estate					
34	Pekaka	Pekaka Mill	-	Bintulu, Sarawak	Withdrawn	NA	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	Bintang Oil Mill	-	Johor	NA	NA	* 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

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							hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
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SDP - RSPO Certification for Time Bound Plan - Indonesia Operations

No	Management Unit	Mill and Supply Base	Time Bound Plan	Latest Internal / External	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name			Audit Date				
1	PT Lahan Tani Sakti	Alur Dumai Mill	-	-	Rokan Hilir District – Riau	Certified	16/01/2012	-
		Alur Dumai Estate						
2	PT Sajang Heulang	Mustika Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	03/07/2013	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Mustika Estate						
		KKPA-2 PT.SHE Estate						
		KKPA-3 PT.SHE Estate						
		KKPA-5 PT.SHE Estate						
Pantai Bonati Estate	06/07/2011							
3	PT Ladangrumpun Suburabadi	Angsana Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	06/07/2021	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Angsana Estate						
		Pantai Bonati Estate						
		Gunung Sari Estate						
		KKPA-1 PT.SHE Estate						
		KKPA-4 PT.SHE Estate						
		Subur Abadi Plasma 1 Estate					TBC	
4	PT Langgeng Muaramakmur	Bebunga Mill	-	-		Certified	16/03/2012	KKPA & Plasma is not under the management control of Sime Darby
		Bebunga Estate						

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		Sungai Cengal Estate			Kotabaru District – South Kalimantan			Plantation. The decision of certification is from KKPA / Plasma themselves.
		Bakau Estate						
		KKPA LMR	TBC	TBC		TBC	TBC	
5	PT Kridatama Lancar	Sukamandang Mill	-	-	Seruyan and East– Kotawaringin District Central Kalimantan	Certified	05/07/2011	-
		Sukamandang Estate						
		Sapiri Estate						
		Barasdanum Estate						
		Kuala Kuayan Estate						
6	PT Bahari Gembira Ria	Ladang Panjang Mill	-		Muaro Jambi District - Jambi	Certified	09/07/2012	Only Division 3 is certified (1,202 Ha). Total Areas of Division 1 and 2 (1,796.19 ha) HGU still in process KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Ladang Panjang Estate						
		Plasma BGR Estate	TBC	TBC		TBC	TBC	
7	PT Tunggal Mitra Plantations	Manggala Mill	-	-	Rokan Hilir District – Riau	Certified	25/11/2010	-
		Manggala 1 Estate						
		Manggala 2 Estate						
		Manggala 3 Estate						
8	PT Paripurna Swakarsa	Pondok Labu Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	-
		Pondok Labu Estate	-	-				
		Binturung Estate						
		Rampa Estate						
		Sesulung Estate						
9	PT Bersama Sejahtera Sakti	Gunung Aru Mill	-			Certified	05/07/2011	-
		Gunung Aru Estate						

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		Gunung Kemas Estate			Kotabaru District – South Kalimantan			
		Laut Timur Estate						
		Pantai Timur Estate						
		KKPA MBP	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
10	PT Guthrie Pecconina	Rantau Panjang Mill	-	-	Musu Banyuasin District – South Sumatera	Certified	16/03/2012	Remarks: Land legalisation process for 4152.70 ha is still in process.
		Rantau Panjang Estate						
		Bumi Ayu Estate						
		Karang Ringin Estate						
		Napal Estate						
		Mangun Jaya Estate						
		Sungai Jernih Estate and GPI KKPA Estate	2023	-	-	-	-	890.98 Ha – Still under Land legalisation process - Process Kadastral. Sg Jernih estate and KKPA was separated in 2022 and recorded separately. KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
11	PT Laguna Mandiri	Rantau Mill	-	-	Kotabaru District – South Kalimantan	Certified	30/12/2011	
		Rantau Estate						
		Matalok Estate						
		Betung Mill						
		Betung Estate						
		Sekayu Estate						
12		Sekunyir Mill	-	-		Certified	23/11/2010	-

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	PT Indotruba Tengah	Sekunyir Seruyan Estate			Seruyan and West Kotawaringin District – Central Kalimantan			
13	PT Swadaya Andika	Selabak Mill Selabak Estate Randi Estate Sangkoh Estate Lanting Estate	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	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.
14	PT Bina Sains Cemerlang	Sungai Pinang Mill Sungai Pinang Estate Bukit Pinang Estate	-	-	Musi Rawas District – South Sumatera	Certified	11/09/2012	Remarks: Land legalisation process for 308.35 ha is still in process.
15	PT Teguh Sempurna	Pemantang Mill Pemantang Estate Kawan Batu Estate Hatan Tiring Estate Batang Garing Estate	-	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	05/07/2011	-
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill Teluk Bakau Estate Nusa Lestari Estate Nusa Perkasa Estate Mandah Mill Mandah Estate Rotan Semelur Estate	-	-	Indra Giri Hilir District – Riau	Certified	11/10/2011 01/04/2014	-
17		Teluk Siak Mill	-	-		Certified	11/10/2011	-

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	PT Intipersada Aneka	Teluk Siak Estate			Pekanbaru, Siak District – Riau			
		Pinang Sebatang Estate						
		Aneka Persada Estate						
18	PT Tamaco Graha Krida	Ungkaya Mill	-	-	Morowali District – Sulawesi Tengah	Certified	10/7/2012	-
		Ungkaya Estate						
		Plasma TGK Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
19	PT SIME Indo Agro	Bukit Ajong Mill	-	-	Sanggau District – West Kalimantan	Certified	18/10/2010	Land legalisation process for East Est for 5815.64 ha is still in process.
		West Estate						
		East Estate						
		East* Estate /Sei Mawang Estate	2023	-		-		Land legalisation for Sei Mawang is still in process
		East Plasma Estate	-	-		Certified	18/7/2016	-
		West Plasma Estate						
20	PT Padang Palma Permai /PT Perkasa Subur Sakti	Blang Simpo Mill	-	-	Aceh Tamiang and East Aceh District – Nangroe Aceh Darussalam	Certified	03/05/2013	-
		Tamiang (PT PPP) Estate						
		Batang Ara (PT PSK) Estate						
		Blang Simpo-01 Estate						
		Blang Simpo-02 Estate						
21	PT Natapalma Sandika	Lembiru Mill	-	-	Ketapang District – West Kalimantan	Certified	03/07/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.
		Lembiru Estate						
		Awatan Estate						

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		Karya Palma Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		KKPA SNP Estate	TBC	TBC		TBC	TBC	
22	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-	-	Ketapang District – West Kalimantan	Certified	03/07/2019	-
		Sungai Putih (PT BAL) Estate	2023	-		-		Land Approval is obtained in 2015 while the other approvals are still in processing HGU obtained as per May 2018 KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Beturus (PT BAL) Estate	2023	-		-		
		KKPA BAL Estate	TBC	TBC		TBC	TBC	
23	PT Mitral Austral Sejahtera	MAS Mill	NA	NA	Sanggau District – West Kalimantan	NA	NA	The properties was sold and currently SDP have no control in the management. Please find latest information on 'Updates on PT MAS' worksheet and updates to RSPO Secretariat.
		MAS 1 Estate						
		MAS 2 Estate						
		MAS 4 Estate						
		Plasma MAS Estate						

SDP - RSPO Certification for Time Bound Plan – Papua New Guinea / Solomon Islands Operations

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	-	Guadalcanal Province, Solomon Islands	Certified	18/03/2011	-
		Tetere Estate					
		Ngalimbiu Estate					
		Mbalisuna Estate					
		Smallholders – West Zone (83)					

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		Smallholders – Central Zone (53)					
		Smallholders – MBA East Zone (59)					
		Smallholders – MBE East Zone (37)					
2	Milne Bay Estate (MEB)	Hagita Oil Mill	-	Milne Bay Province, PNG	Certified	15/02/2018	-
		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, PNG	Certified	19/03/2012	-
		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 Industrial Ltd (RAIL)	Gusap Mill	-	Morobe Province, PNG	Certified	05/08/2010	-
		Gusap East (Gusap) Estate					

		Gusap West (Paddox) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	Oro Bay Province, PNG	Certified	01/02/2013	-
		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	-	Kimbe, West New Britain, PNG	Certified	10/09/2008	-
		Kumbango Oil Mill					
		Kapiura Mill					

		Numundo Mill					
		Waraston Mill					
		Bebere Estate					
		Kumbango Estate					
		Togulo Estate					
		Dami Estate					
		Waisisi Estate					
		Kautu Estate					
		Karaisu Estate					
		Moroa Estate					
		Bilomi Estate					
		Loata Estate					
		Haella Estate					
		Garu Estate					
		Daliavu Estate					
		Sapuri Estate					
		Malilimi Estate					
		Rigula Estate					
		Numundo Estate					
		Navarai / Karato ME /KDC EU Estate					
		Volupai / Lotomgam / Natupi / Goruru Estate					
		Lolokoru Estate					
		Ove Estate					
		Tamare Estate					

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		Smallholders LSS Mosa (1822)					
		Smallholders VOP East (1817)					
		Smallholders VOP Central (1964)					
		Smallholders VOP West (1279)					
		Smallholders LSS Kapiura (551)					
		Smallholders VOP Kapiura (850)					
		Smallholder Kaulong / Akami / Pushiki / Repamira / Sakapei					
7	Markham Farms Company Limited (MFCL) / Markham Agro Pte Ltd	Erap Mill	-	Markham Farms	Certified	27/3/2020	There is total area NPP: 710.30ha which is currently excluded from the certification scope until the NPP is approved

3.3 Details of Nonconformities

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

During this Assessment there were two (2) Critical; three (3) Minor nonconformities and four (4) Opportunity For Improvement raised. The SOU 2 Chersonese Palm Oil Mill and Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2230351-202207-M1	Issued Date	29/07/2022
Due Date	26/10/2022	Closure Date	21/10/2022
Indicator & Category (Critical / Minor)	3.8.12 – Critical		
Statement of Nonconformity:	The mill has sold more CPO (certified and non-certified) than it had produced.		
Requirement Reference:	Record keeping 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.		
Objective Evidence:	Chersonese Palm Oil Mill For the period under review i.e. Jul 2021 to Jun 2022, based on the mill’s mass balance accounting, it was found that the total production of CPO (certified and non-certified) is 32,509.31 mt while the total sales is 36,428.15 mt (5,338.65 mt as certified and 31,428.15 as non-certified).		
Corrections:	Mill management already informed GTM through email regarding changes made in sales of CSPO. Mill also requested GTM to stop immediately the sales of RSPO CSPO to balance the Mass Balance sale to positive stock during period under review.		
Root Cause Analysis:	<ol style="list-style-type: none"> Monitoring on read-only basis, since Palm Trace only can be edited by GTM. Figures in Mass Balance sheet is based on Palm Trace figures declared by GTM. GTM frequently makes adjustment without informing Chersonese Palm Oil Mill. Insufficient training for PIC for documenting Mass Balance Sheet and Palm Trace. 		
Corrective Actions:	<ol style="list-style-type: none"> Mill to ensure monitoring of mass balance sheet and palm trace on regular basis to alleviate any discrepancies regarding mass balance and palm trace figure. To communicate with GTM on monthly basis for clarification on MB product sales on Palm Trace. PIC and relevant personnel to have the SCCS training by GSD on annual basis. 		

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Assessment Conclusion:	<p>Major NC verification visit:</p> <p>The mill has communicated with to stop immediately the sales of RSPO CSPO to balance the Mass Balance sale to positive stock during period under review as per email dated 12/09/2022</p> <p>The mill has updated the mass balance sheet. For the period under review i.e. Jul 2021 to Jun 2022, based on the mill’s mass balance accounting, the total production of CPO (certified and non-certified) recorded at 32,509.31 mt. The actual CPO sold as certified was recorded at 11,364.36 mt while CPO sold as conventional recorded at 18,186.52 mt. The total of CPO sold was at 29,550.88. The total certified CPO sold was tallied with records and announcement done in palmtrace.</p> <p>The mill has communicate with GTM on monthly basis for certified CPO and PK sold. reviewed the communication email dated for the month of September 2022. The mill representative has attended the RSPO SCCS Training for Northern Region Mill Personal conducted on 29/09/2022 by GSQM. Reviewed the attendance list and training material for training conducted.</p> <p>Based on the site verification documented evidences provided, the CAP verified to be sufficient to address the Major NC. Hence, Major NC closed on 21/10/2022.</p>
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Non-conformity			
NCR Ref #	2230351-202207-M2	Issued Date	29/07/2022
Due Date	26/10/2022	Closure Date	21/10/2022
Indicator & Category (Critical / Minor)	6.2.2 - Critical		
Statement of Nonconformity:	<ol style="list-style-type: none"> Contractors at Kalumpong Estate were not able to demonstrate compliance with relevant legal requirements, namely, Minimum Wages Order 2022, Employees’ Social Security Act 1969, Employment Insurance Scheme Act 2017 and Employees Provident Fund Act 1991. Contracts entered between the contractors and their respective workers, and their payslips do not give accurate information on how compensation for was calculated. 		
Requirement Reference:	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.		
Objective Evidence:	<p>Kalumpong Estate</p> <ol style="list-style-type: none"> Based on payslips reviewed, the following contractors at Kalumpong Estate had failed to demonstrate that they have complied with national legal requirements, namely Minimum Wages Order 2022 by not paying their workers minimum wages of RM1,500 in May and June 2022. 		

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Contractor	Workers	Month of pay	Basic pay (RM)
Joy Raj Enterprise	680613-08-xxxx	June 2022	1,200
		May 2022	1,200
	980114-08-xxxx	June 2022	1,250
		May 2022	1,250
	840321-61-xxxx	June 2022	1,250
		May 2022	1,250
Sg Dungun Enterprise	830407-08-xxxx	May 2022	1,100
	861212-35-xxxx	May 2022	1,100

2. Based on payslips for salary Jan, Feb, May and June 2022, Oons Enterprise could not demonstrate its compliance with Employment Provident Fund Act 1991, Employees' Social Security Act 1969, and Employment Insurance Scheme Act 2017 when it failed to make statutory deductions for EPF, SOCSO and EIS from Worker 590218-08-xxxx.

3. The following employment contracts signed between the contractors with their workers only mentioned that salary would be paid on a piece-rated basis. However, no rates were stated in the contract. The payslips reviewed also did not give accurate information on how the workers' salaries were calculated.

Contractor	Workers	Date of contract	Payslips
Mano BS Enterprise	880414-08-xxxx	01/01/2022	June 2022
			May 2022
			April 2022
			Mar 2022
			Feb 2022
Joy Raj Enterprise	840321-61-xxxx	Jan 2021	June 2022
			May 2022
			April 2022
			Mar 2022

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				Feb 2022
		680613-08-xxxx	Jan 2022	June 2022
				May 2022
				April 2022
				Mar 2022
				Feb 2022
		980114-08-xxxx	Jan 2021	June 2022
				May 2022
				Apr 2022
				Mar 2022
				Feb 2022
	Oons Enterprise	891206-08-xxxx	02/01/2022	May 2022
				June 2022
				Feb 2022
	<p>4. Employment contract dated 01/01/2019 signed between Sungai Dungun Enterprise and its worker (861212-35-xxxx) specified how his piece-rate is to be calculated. However, the payslips for June, May, April, March, and Feb 2022, did not specify how his actual earnings were calculated.</p> <p>The estate management has taken immediate an action by issued warning letter to the respective contractors on 21/05/2022.</p>			
Corrections:	To conduct refresher briefing to all contractor using Bahasa Malaysia materials and ensure contractors comply with legal and others requirement. Contractors to submit documents and evidence related to estate management.			
Root Cause Analysis:	Estate management has engaged with all contractors regarding legal and other requirements, however these contractors still does not fully understand due to limitations of understanding (language illiterate, training materials in English).			
Corrective Actions:	Estate management has appointed EIC (Executive In-Charge) and supported by SSSO to monitor contract workers documentation (Employment contract and pay slip) on monthly basis. Appointed EIC & SSSO will ensure hired contract & their			

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	workers should comply with Minimum Wages Order 2022, Employees’ Social Security Act 1969, Employment Insurance Scheme Act 2017 and Employees Provident Fund Act 1991.																		
Assessment Conclusion:	<p>Major NC verification visit”</p> <ol style="list-style-type: none"> The contractors, Joy Raj Enterprise and Sg. Dungun Enterprise has paid the insufficient salary payment for the month of May and June 2022 included in the month of August 2022 salary. this will also attract the payment for SOCSO, EPF and EIS payment for the month. Reviewed the payslip for the month of August 2022, form 8A for SOCSO contribution and form A for EPF contribution for the contractors workers. For workers with I/C no. 590218-08-xxxx was above retirement age of 60 years old. No requirement for EPF and SOCSO contribution for workers above 60 years old. The contractors workers were actually paid through daily rated payment. The contractors has made addendum to the employment contracts. Reviewed the employment contracts for workers as follows: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Contractors</th> <th style="text-align: left;">Workers employment id</th> <th style="text-align: left;">date acknowledgement</th> </tr> </thead> <tbody> <tr> <td>Mano BS Enterprise</td> <td>880414-08-xxxx</td> <td>10/08/2022</td> </tr> <tr> <td>Joy Raj Enterprise</td> <td>840321-61-xxxx</td> <td>10/08/2022</td> </tr> <tr> <td></td> <td>680613-08-xxxx</td> <td>10/08/2022</td> </tr> <tr> <td></td> <td>980114-08-xxxx</td> <td>10/08/2022</td> </tr> <tr> <td>Oons Enterprise</td> <td>891206-08-xxxx</td> <td>01/08/2022</td> </tr> </tbody> </table> <ol style="list-style-type: none"> SOU 2 Chersonese POM and supply base has conducted training for all contractors regarding the contract agreement, salary payment, EPF and SOCSO contribution on 23/08/2022. The training was conducted with cooperation by Labour Office, EPF office and SOCSO office representative. Reviewed the attendance list and training material. noted during interview with the contractors, the understanding regarding the training conducted was satisfactory. The estate has appointed the Asst. manager as EIC (Executive In-Charge) to monitor the contractors workers documentation as per appointment letter dated 01/08/2022 signed by the Estate Manager. The Asst. Manager and SSSO conducted contractors workers documentation on monthly basis. reviewed the monitoring records for the month of September and October 2022. <p>Based on the site verification documented evidences provided, the CAP verified to be sufficient to address the Major NC. Hence, Major NC closed on 21/10/2022.</p>	Contractors	Workers employment id	date acknowledgement	Mano BS Enterprise	880414-08-xxxx	10/08/2022	Joy Raj Enterprise	840321-61-xxxx	10/08/2022		680613-08-xxxx	10/08/2022		980114-08-xxxx	10/08/2022	Oons Enterprise	891206-08-xxxx	01/08/2022
Contractors	Workers employment id	date acknowledgement																	
Mano BS Enterprise	880414-08-xxxx	10/08/2022																	
Joy Raj Enterprise	840321-61-xxxx	10/08/2022																	
	680613-08-xxxx	10/08/2022																	
	980114-08-xxxx	10/08/2022																	
Oons Enterprise	891206-08-xxxx	01/08/2022																	

Non-conformity			
NCR Ref #	2230351-202207-N1	Issued Date	29/07/2022
Due Date	Next Assessment	Closure Date	Open

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Indicator & Category (Critical / Minor)	3.4.2 – Minor
Statement of Nonconformity:	The environmental aspect at FFB receiving ramp was not adequately identified.
Requirement Reference:	Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.
Objective Evidence:	<p>Chersonese palm Oil Mill</p> <p>During the site visit at underneath the FFB receiving ramp, it was observed that there were pipelines to channel the rainwater from the FFB receiving ramp floor above to a monsoon drain flowing to the environment. The monsoon drain was also seen to be silted with palm fruitlets and debris. However, this environment interaction was not captured in the mill’s “Environmental Aspects and Impact Identification Form” [doc. no.: EAI/2012-13/002/B] annually reviewed recent on 19/01/2022.</p> <p>Holyrood Estate</p> <p>There were 10 empty pre-mixed chemical containers found to be left overnight at field no. 020A, Holyrood Estate during the field assessment visit. This is confirmed through an interview with a Pest and Disease spraying operator who was working there and the field staff. However, this matter was not risk assessed to identify the impact on environment.</p>
Corrections:	To conduct EIE/EAI for abnormal and non-routine situations FFB Receiving and Spraying
Root Cause Analysis:	<p>Chersonese Palm Oil Mill</p> <p>Environmental Aspect & Impact Identification was reviewed by Estate & Mill Management. However not include abnormal situation for the crop diversion received. Additional FFB received from SOU1 are stored on the floor loading ramp, since the loading ramp hopper is full with FFB from SOU2. The drainage channel came from the ramp floor instead of hopper. (The pipelines is the original design. The abnormal situation here means the diverted crop received. Therefore, EIE/EIA to be assessed under abnormal condition.)</p> <p>Holyrood Estate</p> <p>Environmental Aspect & Impact Identification was reviewed by estate but not include abnormal situation (empty container left in the field). In normal day to day operation all empty container will be collected in the afternoon for chemical premixing.</p>
Corrective Actions:	Review EIE/EAI by Estate & Mill Management. Verified by RSQM-NTR
Assessment Conclusion:	The effectiveness implementation of corrective action plan will be assessed during next assessment

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Non-conformity			
NCR Ref #	2230351-202207-N2	Issued Date	29/07/2022
Due Date	Next Assessment	Closure Date	Open
Indicator & Category (Critical / Minor)	2.1.2 – Minor		
Statement of Nonconformity:	A reference document of law for ensuring legal compliance was not in place.		
Requirement Reference:	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.		
Objective Evidence:	Chersonese Palm Oil Mill Based on the mill’s DOE’s Compliance Schedule (Jadual Pematuhan) [License No.: 004229, validity: 01/07/2022 to 30/06/2023], Clause #21, the mill is required to manage its empty fruit bunches in accordance to the Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit terbitan terkini (latest edition of Empty Fruit Bunches Management Plan Guideline. However, such guideline was not made available during the audit.		
Corrections:	Mill has sought DOE Taiping enforcement officer regarding the latest Garis Panduan.		
Root Cause Analysis:	The Mill did not liaise with DOE regarding the latest changes in DOE’s Compliance Schedule (Jadual Pematuhan).		
Corrective Actions:	Mill shall liaise with DOE regarding any changes and shall make available any documents required (upon receiving the latest guidelines).		
Assessment Conclusion:	The effectiveness implementation of corrective action plan will be assessed during next assessment		

Non-conformity			
NCR Ref #	2230351-202207-N3	Issued Date	29/07/2022
Due Date	Next Assessment	Closure Date	Open
Indicator & Category (Critical / Minor)	3.3.2 - Minor		
Statement of Nonconformity:	The mechanism to check that the following SOPs are consistent is not effectively implemented a. General Rules for Workers’ Housing at Tali Ayer Estate on the prohibition of sale and purchase of alcoholic drink; and b. Inter-Office Mail (Ref No. CEO/060/12/2020) from the CEO, Upstream Malaysia dated 29/12/2020 which requires that: <ul style="list-style-type: none"> • workers comply with disciplinary measures; and • housing surroundings are kept clean and safe. c. First Aid in Workplace Procedure – UM/HSE/OCP/01		

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Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.
Objective Evidence:	<p>It was found during the audit as follows:</p> <p>Tali Ayer Estate</p> <p>a. Kedai Runcit Muniandy was selling alcoholic drinks to workers. This sale and purchase transactions were confirmed by representatives of Kedai Runcit Muniandy and some estate workers who were interviewed during the audit. The auditor also noted a can of Carlsberg stored in the fridge at the shop.</p> <p>Chersonese Palm Oil Mill</p> <p>b. At Chersonese POM, although a risk assessment dated 30/03/2022 was done on garage structures built by the workers at their houses, in particular Houses No. 10A and 14A, these structures remain in the same conditions and not repaired to reduce the risks identified.</p> <p>c. Previous building demolition site in front of Chersonese Palm Oil Mill housing is left littered with refuse, namely concrete construction debris which was not disposed of satisfactorily. There is also no hazard tape to demarcate the area.</p> <p>Chersonese Estate</p> <p>Noted during site visit at the harvesting gang, it was noted that the 2 items (cream) in the first aid box were not labelled with the items type and expiry date even though the list of items and expiry date were available on the first aid box. This was against the First Aid in Workplace Procedure – UM/HSE/OCP/01 under section 10 First Aid Best Practice which stated as follows: "Supplies must be easier to identify for immediate use. Appendix 3 Recommended First Aid Box/ Kit Best Practice."</p>
Corrections:	<p>Tali Ayer Estate</p> <p>Immediate spot check on any illegal items (alcohol) conducted at the sundry shop by estate management together with Estate Auxiliary Police and stern warning letter (4/8/2022) to the premise owner (Muniandy).</p> <p>Chersonese Palm Oil Mill</p> <ol style="list-style-type: none"> 1. Mill shall consult both tenants to barricade the garage due to unsafe condition 2. The construction debris has been removed <p>Chersonese Estate</p> <p>All items in the first aid box is labelled on numbers as per checklist inside the box for easy identification (name of items and expiry date).</p>
Root Cause Analysis:	<p>Tali Ayer Estate</p> <p>Estate conducted the briefing to shop owner and they are understood, however lack of enforcement and monitoring by the security unit on the implementation resulted the incident happened.</p> <p>Chersonese Palm Oil Mill</p>

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	<p>1. The original design of housing does not include the porch. Due to this factor garage was built by the workers using their own funding. The process of approval includes an approved drawing by Professional Civil Engineer for the extension building since the original design of housing does not include the porch. All the workers use their own funds to build the garage. There are no allocations to repair both garages since there aren't any asset numbers for the workers garage because it is an added structure (not within the original design). Therefore, there are no such allocations for the purpose unlike housing repair which is an allocated budget (which has an asset number). We need to apply for a distinct budget along with approved technical drawings verified by Engineering Services prior to approval. This the very reason for the budget requested FY2023.</p> <p>2. The site was previously Chersonese Estate Workshop. The heap of debris is derived from demolition works. The location of the demolished heap of debris is within the estate's perimeter. This location is not within mill housing jurisdiction. Previously an excavator hired by Chersonese Estate to demolish the unused structure which was the estate former workshop. The excavator failed to complete the demolition since the structure was too hard to demolish. The heap of debris was left unattended by the contractor.</p> <p>Chersonese Estate</p> <p>The items were added as additional items in the first aid box but not labelled at harvesting gang first aid box during the audit due to miss out numbering on new replacement bottle.</p>
<p>Corrective Actions:</p>	<p>Tali Ayer Estate</p> <p>Enhance company policy and random spot check on a monthly basis by Auxiliary Police is to be conducted to ensure there are no any trade of illegal items by the owner premise.</p> <p>Chersonese Palm Oil Mill</p> <p>1. To request unbudgeted OPEX for swifter rectification. Will rectify with mill own cost and upon exceeding the cost mill shall obtain supplementary budget from regional level.</p> <p>2. It has now been identified for mill housing elevated water tank project . To include site clearing in contract agreement after completion of job and site verification by mill management before release of payment.</p> <p>Chersonese Estate</p> <p>The indicator of monthly inspection shall include the label of items and expiry date. Inspection record verify by Estate Management.</p>
<p>Assessment Conclusion:</p>	<p>The effectiveness implementation of corrective action plan will be assessed during next assessment</p>

Opportunity for Improvements	
OFI #	Description
2230351-202207-I1	2.1.3 The maintenance of boundary demarcations between Chersonese Estate and SK Matang Gerdu and between Kalumpang Estate and Kg Tersusun can be further improved
2230351-202207-I2	5.1.5 Correspondences and contracts signed with contractors were prepared in English. Since the contractors are more conversant in Bahasa Malaysia, it is an opportunity for improvement for these contracts and all correspondences to be in Bahasa Malaysia.
2230351-202207-I3	6.1.5 Each operating unit within SOU 2 has its own Gender Committee whose members are women employees. Gender-related issues such as domestic violence, sexual harassment and reproductive rights may also concern workers' wives who live within SOU 2 premises. As an opportunity for improvement, and to extend awareness on such issues to the workers' wives, Gender Committee membership be extended to include the workers' wives also.
2230351-202207-I4	7.10.1 The maintenance of the oil trap at Chersonese Estate's workshop washing bay can be further improved, therefore it can trap any spilled oil more efficiently.

Positive Findings	
PF #	Description
PF 1	Good commitment from the management to maintain the system.
PF 2	Positive feedbacks from the stakeholders

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2087601-202108-M1	Issued Date	04/08/2021
Due Date	02/11/2021	Closure Date	01/10/2021
Indicator & Category (Critical / Minor)	3.4.1 (Critical)		
Statement of Nonconformity:	As sampled found Environmental aspect identification and impact assessment for existing operation not properly conducted where identification of environmental impact not consistent and legal references stated found not properly stated and accurate.		
Requirement Reference:	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.		
Objective Evidence:	Found Environmental Aspect and Impact Identification Form: Holyrood Estate Serial No. EAI/2019/01		

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	<p>Aspect: Use of Resources with load of Fuel/Lubricant not considered impact (7. Depletion of Nat. Resources) Legal Reference: EQ Regulations 1996 found non-existence. No Date specifically stated as required in the document.</p> <p>Serial No. EAI/2019/02 Aspect: Use of machine with load of Exhaust Gas not correctly considered I impact (7. Depletion of Nat. Resources). Exhaust gas is an emission release to atmosphere. Legal Reference: EQ Regulations 1996 found non-existence and EQ (Clean Air) Regulations 1978 was revoked and currently under EQ (Clean Air) Regulations 2014. No Date specifically stated as required in the document.</p> <p>Serial No. EAI/2019/03 Aspect: Use of Resources with load of Energy/Manpower not correctly considered as impact categorized as (7. Depletion of Nat. Resources). Manpower used is not relevant to environmental aspect. Aspect: Use of Resources – transport with load of Exhaust Gas not correctly considered impact categorized as (7. Depletion of Nat. Resources). Exhaust gas is an emission release to atmosphere. Aspect: Use of Resources – transport with load of Fuel/Lubricant not considered potential impact (7. Depletion of Nat. Resources) Legal Reference: EQ Regulations 1996 found non-existence and EQ (Clean Air) Regulations 1978 was revoked and currently under EQ (Clean Air) Regulations 2014. No Date specifically stated as required in the document.</p> <p>Tali Ayer Estate FY2017/2018 (Zenoah Blower) Aspect: Spillage with load of Petrol not considered impact (7. Depletion of Nat. Resources) as it a waste of natural resources if spill. Legal Reference: EQ Regulations 1996 found non-existence. Aspect: Release to Air with load of Exhaust Gas not correctly considered impact (7. Depletion of Nat. Resources). Exhaust gas is an emission release to atmosphere. Aspect: Equipment with load of Noise referred to Legal EQ (EQA (Noise Exposure) Regulations 1987 which non-existence. Prepared on 02/07/18</p> <p>Kalumpong Estate Serial No. EAI 2019/WTP/01 Area: Water Pump Aspect: Power consumption with load of electricity not considered impact (7. Depletion of Nat. Resources) Prepared date: 30/01/19</p> <p>Serial: EAI 2016-17/02</p>
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	<p>Area: Harvesting</p> <p>Aspect: Spillage with load of Loose fruit not correctly considered impact (5. Land Contamination). Loose fruit is not an impact to environment.</p> <p>Approved date 01/10/17.</p>
Corrections:	Arrange the training to review Environmental Aspect & Impact Identification
Root Cause Analysis:	Environmental Aspect & Impact Identification was reviewed by Estate Management without proper training conducted
Corrective Actions:	Conduct evaluation training Environmental Aspect & Impact Identification and review Environmental Aspect & Impact Identification. Reviewed Environmental Aspect & Impact Identification shall be verified by RSQM-NTR
Assessment Conclusion:	<p>Due to the nature of Major NC CAP able to verified off-site and restrictions of on-site visit due to COVID-19 NRP, all evidences were requested to submitted for off-line verification. Documented evidences received as following:</p> <ul style="list-style-type: none"> - Revised Environmental Aspect and Impact Identification Form; Serial # EAI/2021/SWS/01 and Environmental Impact Evaluation Form Serial # EIE/2021/SW/02; both dated 24/9/2021 on the Scheduled Waste receiving, storage and disposal activity revised environmental aspects, impacts and controls. - Training slides entitled ENVIRONMENTAL ASPECT IMPACT IDENTIFICATION (EAI) & ENVIRONMENTAL IMPACT EVALUATION (EIE) REFRESHER TRAINING; Dated 23rd September 2021; Conducted by Northern RSQM personnel attended by all operating unit of SOU 2 person in-charge for Scheduled Waste. Total attendance = 19. <p>Based on the documented evidences provided, the CAP verified to be sufficient to address the Major NC. Hence, Major NC closed on 1/10/2021.</p>
Effectiveness Closure (for previous audit closed Critical NC):	The revised Environmental Aspect and Impact Identification and Environmental Impact Evaluation forms have been well maintained by all the sampled estates. The interviewed trained persons in-charge had also shown a good understanding in utilising the forms correctly. Reviewing the evaluation forms was done from time to time to ensure the information and evaluation results are still relevant. There was no recurrence of non-conformity and therefore the non-conformity report remains closed.

Non-conformity			
NCR Ref #	2150004-202201-N1	Issued Date	07/01/2022
Due Date	29/07/2022	Closure Date	29/07/2022
Indicator & Category (Critical / Minor)	6.7.2 (Minor)		
Statement of Nonconformity:	Found missed understanding of workers on the usage of emergency equipment and unpreparedness of fire-fighting facilities such as Boiler Sub-alarm Panel during site visit at Chersonese POM.		
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.		

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Objective Evidence:	<ul style="list-style-type: none"> • Observed during site visit, a worker using at least 2 hose reels looked alike (not from fire-fighting system piping) for cleaning floor and drain. • Sighted misused of emergency equipment such as a Nozzle was coupled to a fire hydrant near EFB storage yard and few hose reels without nozzles. • Sub-alarm Panel in Boiler Control Room in isolated position due to battery faulty and not in position to detect any potential smoke or fire if occurred.
Corrections:	<ul style="list-style-type: none"> • To paint (blue colour) the re-used hose reel for cleaning hose reel. Painting job for re-used hose reel have been completed on 4th Jan 2022. • To remove nozzle from fire hydrant and store in Fire Hydrant Box (locked) and re-installed nozzle (plastic) for hose reels. Nozzle have been removed on 4th Jan 2022 and safely store in Fire Hydrant Box and nozzle for hose reel have been installed. • To replace faulty battery. Faulty battery has been replaced on 5th Jan 2022. Mill work progress to restoring Fire Fighting Equipment and System are at 80% as to renew Bomba Certificate.
Root Cause Analysis:	<ul style="list-style-type: none"> • Mill re-used BOMBA hose reel for cleaning hose pipe housekeeping. • Nozzle was coupled to a fire hydrant misused by contractor’s workers for their hand cleaning and brass’s nozzle at hose reel have been stolen with cut effect. • Mill in progress to restoring Fire Fighting Equipment and System as to renew certificate of BOMBA license.
Corrective Actions:	<ul style="list-style-type: none"> • To ensure all firefighting system (Emergency Properness Response) ready to use during emergency, to conduct periodically inspection with proper report. • To ensure complied with fire certificates. • To conduct training to all workers and to ensure no misused of emergency equipment.
Assessment Conclusion:	CAP has been accepted. Evidence of implementation and the CAP effectiveness to address the Minor NC to be verified during next assessment.
Effectiveness Closure (for previous audit closed Critical NC):	<ol style="list-style-type: none"> 1. The mill has differentiate the water hose reel to be use for maintenance with blue colour and for firefighting with red colour as sighted during site visit at the tipper station and kernel plant station. 2. No evidence of fire hydrant been use for maintenance. Sighted the fire hydrant located at near the EFB yard were kept in the fire hydrant box and locked. 3. Battery for Sub-alarm Panel in Boiler Control Room has been replaced and the system is fully functional. 4. The mill conducted fire equipment inspection on quarterly basis. reviewed the inspection records as follows: <ol style="list-style-type: none"> a. Fire hose reel dated monitoring log records dated 16/05/2022, 11/03/2022 and 07/01/2022, b. Fire hydrant monitoring log records for the month of 10/05/2022, 08/01/2022 c. Fire extinguisher monitoring log records 08/07/2022, 04/05/2022 and 15/03/2022. 5. As per letter from Perak Fire Department dated 13/04/2022, Chersonese POM doesn’t required to obtain Fire Certificate as per “Akta Perkhidmatan BOMBA 1988 (Akta 341) and “Perintah Perkhidmtan BOMBA (Premis Ditetapkan)

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	<p>(Pindaan) 2020 P.U (A) 289/2020. Refer letter ref. no. jbPM/PK/BKK: 700-3/1/7/122.</p> <p>6. The mill has conducted training to ensure no misused of emergency equipment. Reviewed the training records entitled ERT and fire drill training dated 09/02/2022 and 20/07/2022.</p>
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Opportunity for Improvement	
OFI#	Description
2150004-202201-I1	<p>OFI Statement: 6.2.4: Provision of NEST's (Nursery For Estate's Toddlers) amenities such as toys and play items, mattress and pillow as well as educational material including posters, television, DVD player, books, magazines etc. could be further enhanced among estates within SOU 2.</p> <p>Verification / Follow-up actions: The NEST's (Nursery For Estate's Toddlers) amenities will be upgraded from time to time base on requirements and year budget</p>
2150004-202201-I2	<p>OFI Statement: 6.3.2: The minutes of meetings copy for meeting between the unit of certification management with trade unions (NUPW) or workers representatives, could be further provided digitally/electronically (WhatsApp, email, etc.) for ease of workers' representative safekeeping or distribution among workers as an alternative to public signboard display.</p> <p>Verification / Follow-up actions: The minutes of meeting were made available to all the workers representatives.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1361165M1	Major	6.5.2	29/07/2016	Closed out on 29/09/2016
1361165M2	Major	7.1.1	29/07/2016	Closed out on 29/09/2016
1361165M3	Major	7.3.2	29/07/2016	Closed out on 29/09/2016
1361165M4	Major	7.8.1	29/07/2016	Closed out on 29/09/2016
1361165N1	Minor	6.2.3	29/07/2016	Closed out on 16/06/2017
1361165N2	Minor	2.1.4	29/07/2016	Closed out on 16/06/2017
1361165N3	Minor	7.1.2	29/07/2016	Closed out on 16/06/2017
1361165N4	Minor	7.8.2	29/07/2016	Closed out on 16/06/2017

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1361165N5	Minor	6.10.3	29/07/2016	Closed out on 16/06/2017
1490713-201706-N1	Minor	5.3.3	16/06/2017	Upgrade to Major NC
1643002-201805-M1	Major	5.3.3	07/06/2018	Closed out on 20/8/2018
1811307-201904-M1	Major	4.1.1	18/07/2019	Closed out on 04/10/2019
1811307-201904-M2	Major	6.1.3	18/07/2019	Closed out on 04/10/2019
1811307-201904-M3	Major	6.5.1	18/07/2019	Closed out on 04/10/2019
1811307-201904-N1	Minor	4.7.3	18/07/2019	Closed out on 26/06/2020
1811307-201904-N2	Minor	2.1.3	18/07/2019	Raised under 6.2.3 (Critical)
1811307-201904-N3	Minor	6.5.3	18/07/2019	Closed out on 26/06/2020
1811307-201904-N4	Minor	4.6.10	18/07/2019	Closed out on 26/06/2020
1811307-201904-N5	Minor	5.6.3	18/07/2019	Closed out on 26/06/2020
1923274-202004-M1	Major (Critical)	6.2.3	08/09/2020	Closed out on 08/09/2020
1923274-202004-M2	Major (Critical)	3.8.16	08/09/2020	Closed out on 08/09/2020
1923274-202004-M3	Major (Critical)	3.8.12 (iii)	08/09/2020	Closed out on 08/09/2020
1923274-202004-M4	Major (Critical)	6.7.3	08/09/2020	Closed out on 08/09/2020
1923274-202004-N1	Minor	3.3.2	26/06/2020	Closed out on 02/08/2021
1923274-202004-N2	Minor	6.7.4	26/06/2020	Closed out on 02/08/2021
2087601-202108-M1	Major (Critical)	3.4.1	04/08/2021	Closed out on 01/10/2021
2150004-202201-N1	Minor	6.7.2	07/01/2022	Closed out on 29/07/2022
2230351-202207-M1	Major (Critical)	3.8.12	29/07/2022	Closed out on 21/10/2022
2230351-202207-M2	Major (Critical)	6.2.2	29/07/2022	Closed out on 21/10/2022
2230351-202207-N1	Minor	3.4.2	29/07/2022	Open
2230351-202207-N2	Minor	2.1.2	29/07/2022	Open
2230351-202207-N3	Minor	3.3.2	29/07/2022	Open

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to *arrange meetings at a location convenient to them to discuss SOU 2 Chersonese Palm Oil Mill and Supply Base 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

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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.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Workers Representative	<ol style="list-style-type: none"> 1. Mandore 2. Harvester 3. General workers 4. Gender Committee Representative 5. NUPW Representative 	Face to face interview
Local Communities	Hindu temple at Tali Ayer Estate	Face to face interview
Governmental Department	SRJK(T) Ladang Sg Bogak	Face to face interview
Union	NUPW, Perak branch	By phone
Contractors/suppliers	Joy Raj Enterprise	Face to face interview
	Sg. Dungun Enterprise	Face to face interview
	Resam Enterprise	Face to face interview
	Safwan PA Enterprise	By phone
	Kedai Runcit Muniandy	Face to face interview
	Kedai Runcit Heng	Face to face interview

Stakeholders comment	
1	<p>Feedbacks:</p> <p>Contractors (transporters and suppliers) interviewed informed of the following:</p> <ol style="list-style-type: none"> a. Sime Darby Plantation’s payments are very prompt. Approved payments are often received within a week or so of invoice submission. b. They also confirmed their awareness of Company’s Vendor COBC requirements, grievance mechanism, and requirement to comply with legal obligations including health and safety measures. c. They have been invited to attend stakeholder meetings and briefed of company policies during stakeholder meetings.

	<p>d. The Malay contractors request that correspondences and contracts be prepared in Bahasa Malaysia, as this is the language that they are conversant in.</p> <p>e. The contractors also informed that they submit copies of their contracts with their workers, monthly payslips to the estate/mill regularly.</p> <p>f. FFB transporters say that their profit margin is now lower than before because despite the increase in overall costs, the contract rates remain. They wish to be able to negotiate higher contract rates to reflect the increase in overall costs.</p> <p>The management noted on the comment and will consider stakeholders' request for a Bahasa Malaysia version of the contract.</p>
	<p>Audit Team verification and response:</p> <p>a. Via stakeholder interviews, it was confirmed that the stakeholders were only aware of the payment terms and duration of contract. They could not understand the other terms and conditions contained in the contract with Sime Darby Plantation, e.g., that they can assign the contract to another party with prior written consent of the Sime Darby Plantation.</p> <p>b. Review of payslips and contracts between some sampled contractors revealed that some do not comply with the Minimum Wages Order 2022 and that the terms of contract regarding payment of piece-rate are not clear. Similarly, their workers' payslips are also unclear as to how their wages were calculated. One contractor did not make any statutory deductions for EPF, SOCSO and EIS. These have been found to be Major non-compliances under Indicator 6.2.2 below</p>
<p>2</p>	<p>Feedbacks:</p> <p>School teacher from SRJK(T) Ladang Sg Bogak is grateful for the support received from Tali Ayer Estate which provides continuous support and provide in-kind benefits to the school such as paying for the water and electricity bills. Because this school has only 8 pupils, the teacher hope more estate workers would send their children to this school, instead of elsewhere. The teacher also confirmed that there is no truancy, and that none of the pupils help their parents in the field during school holidays or after school hours.</p> <p>The management noted on the comment.</p>
	<p>Audit Team verification and response:</p> <p>No further issue</p>
<p>3</p>	<p>Feedbacks:</p> <p>Head of the Hindu temple at Tali Ayer Estate informed that the relationship with the management of Tali Ayer Estate is good. The temple is being used by estate workers, and permission is also given to outside worshippers as part of the estate's CSR</p> <p>The management noted on the comment.</p>
	<p>Audit Team verification and response:</p> <p>No further issue</p>
<p>4</p>	<p>Feedbacks:</p> <p>NUPW Perak Branch Secretary (via telephone) confirmed that the previous MAPA-NUPW agreement expired on 31/12/2021. The new agreement is still being negotiated, in particular the aspect of minimum wages for harvesters' pay. In the meantime, the previous MAPA-NUPW agreement remains effective. He also confirmed that NUPW representatives from Chersonese SOU 2 are able to attend NUPW meetings with no restrictions.</p> <p>The management noted on the comment.</p>
	<p>Audit Team verification and response:</p> <p>No further issue</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable as the estates have undergone 2nd cycle of replanting.					

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


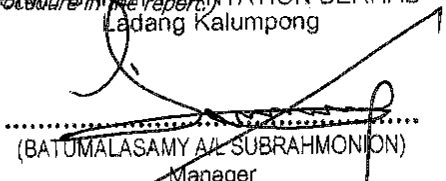
3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that SOU 2 Chersonese Palm Oil Mill and Supply Base has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that SOU 2 Chersonese Palm Oil Mill and Supply Base is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Muhammad Fadzli b. Masran	Name: BATUMALASAMY A/L SUBRAHMONION
Company Name: BSI Services (M) Sdn. Bhd.	Company Name: SIME DARBY PLANTATION BERHAD
Title: Client Manager	Title: MANAGER
Signature: 	Signature: (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.)  SIME DARBY PLANTATION BERHAD Ladang Kalumpang (BATUMALASAMY A/L SUBRAHMONION) Manager
Date: 05/11/2022	Date: 05/11/2022

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> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>It was verified during the audit that the following documents specified in the RSPO P&C were made available to the public either at the estate/mill premises, and available on the Sime Darby Plantation website https://sime-darbyplantation.com/. The documents are:</p> <ul style="list-style-type: none"> - Land titles/user rights - Occupational health and safety plans - Plans and impact assessments relating to environmental and social impacts - HCV documentation - Pollution prevention and reduction plans - Details of complaints and grievances - Continuous improvement plans - Public summary of certification assessment report - Group Sustainability Policy - Record of contributions to community development 	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Information requested are provided in appropriate language and accessible to relevant stakeholders. Sampled during the audit were documents which was prepared bi-lingually, such as company policies. Contracts between Sime Darby Plantation and foreign</p>	Complied

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		worker recruitment agencies were prepared in English. Contracts prepared with local contractors such as Resam Padu Enterprise and Safwan PA Enterprise were also prepared in English.	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Records of requests for information and the responses are maintained. Reviewed during the audit were as follows:</p> <ul style="list-style-type: none"> a. Quarterly reports submitted by the Chersonese POM to the Dept of Environment dated 14/07/2022 and 07/04/2022 which contained the Mill's production data, total CPO produced, total FFB processed, and total water consumption. b. Quarterly reports submitted by Chersonese Estate, to the Labour Office Via Borang PA 2/13 dated on 01/04/2022 and 26/11/2021 on termination of foreign workers. c. Letters of meeting invites sent by Holyrood Estate to its stakeholders dated 18/07/2022 and correspondence from SMK Kubu Gajah dated 13/06/2022 and Boustead Plantation dated 10/06/2022. 	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>	<p>Sime Darby Plantation has developed an SOP known as Consultation and Communications procedures documented in the Standard Operating Manual (Version 1 Year 2008) dated 1 April 2008 entitled "Procedure for External Communications". This SOP was explained to stakeholders during stakeholder meetings held at Chersonese POM (on 22/06/2022) and Chersonese Estate (on 21/06/2022). In addition, these procedures were also displayed at the main notice boards at the estates and mill.</p>	Complied
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>Each operating unit within SOU 2 has their own list of stakeholders and these were made available during the surveillance audit. The list contains all stakeholders i.e., contractors, suppliers, local communities, neighboring plantations, relevant government</p>	Complied

		<p>agencies, buyers, embassies and high commissions, local schools, police stations, fire stations, clinics, etc.</p> <p>Details of the stakeholders e.g. types of work they do, contact number, addresses and nominated representatives were also available. The current stakeholder lists were updated by Chersonese POM (on 01/01/2022), Chersonese Estate (30/06/2022) and Tali Ayer Estate (July 2022).</p>	
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 in place a Code of Business Conduct (COBC) which contains, among others, the following aspects of business conduct:</p> <ul style="list-style-type: none"> • Equal opportunity and non-discrimination • Criminal activities • Harassment ad violence • Avoiding conflicts of interests • Guarding against bribery and corruption • How to report a violation. • Anti-money laundering and anti-terrorism financing <p>Based on sampled documents, SOU 2 was able to demonstrate that the COBC is being implemented in its business operations. Among the sampled documents were contracts between Sime Darby Plantation and recruitment agents namely, PT Wira Karitas (29/05/2022), PT Cipta Rezeki Utama (29/05/2022), PT Cahaya Lombok (29/05/2022), and PT Primadaya Pratama Pandukarya (29/05/2022). Clause 8.1 of the contract requires the agents to comply with the laws, RSPO principles & Criteria, UN Guiding Principles, and ILO Forced Labour Convention etc.</p>	Complied

		<p>Additionally, contractors are required to sign a pledge known as Vendor Integrity Pledge (VIP). Among the sampled contractors who have signed the VIPs included the following:</p> <ul style="list-style-type: none"> a. FFB transporter, Bagan Semak Enterprise (on 12/05/2022) b. Domestic waste collector, Kstasvina Enterprise (on 01/05/2022). c. Loose fruit transporter and grass cutter, Safwan PA Enterprise (on 07/04/2020). d. Supplier Beh Yew Electtical Services (on 10/03/2021). e. Backhoe rental services, Mano BS Enterprise (on 01/06/2021). f. FFB transporter, Resam Padu Enterprise (on 06/04/2021). <p>Interviews with the above contractors confirmed their understanding of the VIP which they signed.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Among the system in place to monitor compliance include the following:</p> <ul style="list-style-type: none"> a. The signing of the Vendor Integrity Pledge (VIP) by contractors and suppliers. Sighted during the audit were VIPs signed by a supplier, Hua Yee Enterprise dated 28/04/2021. Vendor Integrity Pledge which includes a declaration to eradicate all forms of exploitation, including but not limited to modern day slavery and human trafficking. b. Signing of personal commitment & compliance of COBC requirements by workers. c. Internal audit conducted at the Chersonese POM (between 27/06/2022 to 01/07/2022), at Kalumpong Estate (on 14/06/2022) which confirmed the absence of any malpractice. 	Complied

		d. Authority limits for capital and operational expenditure and the requirement for 3 quotations for purchases above RM1000.	
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>The mill & estates continue to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Among the evidence of compliance verified were:</p> <p>Chersonese POM:</p> <ul style="list-style-type: none"> - Certificate of Fitness (Boiler) #PK PMD 80569, valid until 23/08/2023 - Certificate of Fitness (Boiler) #PMD 8698, valid until 27/06/2023 - Certificate of Fitness (Horizontal air receiver tank) #PK PMT 83219, valid until 23/08/2023 - Certificate of Fitness (Horizontal air receiver tank) #PK PMT 83220, valid until 23/08/2023 - Certificate of Fitness (Air compressor) #PK PMT 82467, valid until 27/06/2023 - Certificate of Fitness (Air compressor) #PK PMT 82601, valid until 28/03/2022 - Diesel permit #P: A000754, valid until 13/12/2022 - DOE License #004229, valid until 30/06/2023 - Private installation from Energy Commission, #2022/54643, valid until 11/03/2023 - MPOB License #533667104000, validity 01/11/2021 to 31/10/2022, approved FFB process: 192,000 mt 	Complied

		<p>Chersonese Estate:</p> <ul style="list-style-type: none"> - MPOB License, #526593002000, valid until 31/01/2023 - MPOB License (nursery), #32370011000, valid until 31/08/2022 - Permit to store diesel, #KPDNKK.PBR.003/SK(P/D)117/2009, valid until 30/12/2022 - Permit to store diesel, #KPDNKK.PBR.003/SK(P/D)117/2008, valid until 24/02/2023 - Permit to store petrol, #KPDNKK.PBR.SKK(P/D)002/2017, valid until 17/12/2022 - CF air compressor, #PK PMT 7991, valid until 14/10/2022 - CF air compressor, #PK PMT 7992, valid until 14/10/2022 - Weighbridge calibration certificate, #B 1574790, calibrated on 24/06/2022 <p>Tali Ayer Estate:</p> <ul style="list-style-type: none"> - MPOB License, #621037002000, valid until 31/05/2023 - Permit to store diesel, #A000767, valid until 30/12/2022 - Permit to store diesel, #A000766, valid until 19/01/2023 - Permit to store petrol, #KPDNKK.PBR.SKK(P/D)002/2017, valid until 17/12/2022 - CF air compressor, #PK PMT 512, valid until 07/02/2023 - CF air compressor, #PK PMT 82734, valid until 20/07/2022 – applied for renewal on 04/07/2022 – pending for inspection visit – currently the equipment is not in used until CF is approved 	
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		<ul style="list-style-type: none"> - Weighbridge calibration certificate, #B 417533753, calibrated on 01/10/2021 <p>Holyrood Estate:</p> <ul style="list-style-type: none"> - MPOB License, #530733002000, valid until 30/06/2023 - Permit to store diesel, #A003670, valid until 19/12/2022 - CF air compressor, #PMT-PK/22 7922, valid until 12/09/2023 - CF air compressor, #PMT-PK/22 7923, valid until 12/09/2023 - Weighbridge calibration certificate, #D 018794, calibrated on 06/01/2022 <p>Kalumpong Estate:</p> <ul style="list-style-type: none"> - MPOB License, #524392002000, valid until 31/10/2022 - MPOB License, #542021011000, valid until 31/08/2023 - Permit to store diesel, #A000740, valid until 15/12/2023 - CF air compressor, #PK PMT 116519, valid until 24/08/2023 - CF air compressor, #PK PMT 4079, valid until 24/08/2023 - Weighbridge calibration certificate, #D 019040, calibrated on 21/04/2022 (Gedong Div.) - Weighbridge calibration certificate, #D 018795, calibrated on 06/01/2022 	
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>Addressed in Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all</p>	<p>Non-compliance</p>

		<p>operating units under SOU 2. PSQM Department and the respective operating units will undertake the responsibility of identifying, managing, updating, and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>Tracking system is available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p> <p>SOU 2 has established list of all relevant laws and requirement and documented in Legal and Requirement Register. The list was updated on annual basis or new updates on the register.</p> <p>However, at the mill, it was found that a reference document of law for ensuring legal compliance was not in place. Based on the mill's DOE's Compliance Schedule (<i>Jadual Pematuhan</i>) [License No.: 004229, validity: 01/07/2022 to 30/06/2023], Clause #21, the mill is required to manage its empty fruit bunches in accordance with the Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit terbitan terkini (latest edition of Empty Fruit Bunches Management Plan Guideline. However, such guideline was not made available during the audit. Thus, a non-conformity was assigned due to this lapse.</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>Chersonese estate</p> <p>As sampled at boundary with Kg Nibong Hangus and SK Matang Gerdu, boundary demarcation is made by using estate's roads and PVC pipe pegs. Nonetheless, the maintenance of boundary demarcations between Chersonese Estate and SK Matang Gerdu and between Kalumpong Estate and Kg Tersusun can be further improved (OFI).</p> <p>Tali Ayer estate</p>	Complied

		<p>All the boundaries between Tali Ayer Estate and its adjacent stakeholders were demarcated either by trenches or irrigation.</p> <p>Holyrood Estate The estate clearly demarcated the legal boundaries with red and white colour pole and security trenches as sighted at P10A1 adjacent with Ladang Yayasan Negeri Perak.</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.</p> <p>- Minor compliance -</p>	<p>The mill and estates in SOU 2 have listed and maintain all contracted parties and documented in List of Stakeholder from time to time as parts of their stakeholders includes internal such as employee and workers union and external stakeholders such as FFB suppliers, local community heads, government agencies.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>All contracted parties/vendors were required to sign Vendor Integrity Pledge (VIP) and to comply with all applicable laws and regulations related anti-bribery, fraud and corruption and Vendor Code of Business Conduct (VCOBC) such as labour and Human Rights.</p> <p>Signed Memorandum of Agreement (MOA) were also available for the sampled contractors contained specific clauses on meeting applicable legal requirements to be demonstrated by them.</p> <p>Sampled contracts: Chersonese: 1) Bagan Samak Enterprise (FFB Transport) – validity: 01/01/2022 to 31/12/2023 2) KSTasvina Enterprise (domestic wastes transport) – validity: 01/01/2021 to 31/12/2022</p>	Complied

		Tali Ayer: 1) Bagan Samak Enterprise (FFB and domestic wastes transport) – validity: 01/01/2022 to 31/12/2022	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. - Minor compliance -	Based on verification of the signed contract agreements, Clause 5.4 is referred to the restriction of child labour & protecting the rights of children available in the Vendor COBC and Human Rights Charter protecting the rights of children.	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license - Critical (Major) compliance -	The mill is maintaining a file which consist of documents of the third party FFB suppliers such as contract agreement, MPOB license, location maps with GPS coordinates information and evidence of ownership, to name a few.	Complied
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. - Minor compliance -	There were several indirectly sourced FFB, and the mill is still in the process of collecting the information described in 2.3.1 and expected to complete the process by November 2022.	Complied
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	The business plan for the mill is reflected in the form of annual budget (MPLAN) and the projection for 5 years prepared as	Complied

	<p>- Critical (Major) compliance -</p>	<p>guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget (MPLAN) with 4 years projection (2023 – 2026). The annual budget contains the crop projection and the finance allocation for field operation and administrations. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p>																															
<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<table border="1"> <thead> <tr> <th></th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Chersonese</td> <td>0.00</td> <td>53.72</td> <td>58.42</td> <td>77.61</td> <td>0.00</td> </tr> <tr> <td>Tali Ayer</td> <td>220.77</td> <td>174.09</td> <td>157.42</td> <td>258.03</td> <td>263.66</td> </tr> <tr> <td>Holyrood</td> <td>0.00</td> <td>0.00</td> <td>17.97</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Kalumpong</td> <td>62.51</td> <td>166.03</td> <td>171.47</td> <td>166.78</td> <td>173.45</td> </tr> </tbody> </table>		2023	2024	2025	2026	2027	Chersonese	0.00	53.72	58.42	77.61	0.00	Tali Ayer	220.77	174.09	157.42	258.03	263.66	Holyrood	0.00	0.00	17.97	0.00	0.00	Kalumpong	62.51	166.03	171.47	166.78	173.45	<p>Complied</p>
	2023	2024	2025	2026	2027																												
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<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Management review meeting for the operating units were last conducted on 18/07/2022 (Chersonese POM), 21/07/2022 (Chersonese Estate), 12/06/2022 (Tali Ayer Estate), 15/06/2022 (Holyrood Estate) and 09/07/2022 (Kalumpong Estate). The meetings were chaired by the managers of the operating units and attended by the key personnel.</p> <p>Among the agenda discussed were:</p> <ol style="list-style-type: none"> 1) Results of internal audits 2) Customer (internal/external) feedback 3) Process performance and product conformity 4) Status of preventive and corrective actions 	<p>Complied</p>																														

		<ul style="list-style-type: none"> 5) Follow-up actions from management reviews 6) Changes that could affect the management system 7) Recommendations for improvement 	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>In consideration to of environmental and social impact, the operating units has established continuous improvement plan. Reviewed the sampled established FY 2022 as follows:</p> <ul style="list-style-type: none"> 1. To cease utilising steel drums for CPK oil recovery storage by purchase 25L plastic containers to fill the kernel oil residue 2. Meet new regulatory requirement of <15% boiler emission 3. To install amenities for workers housing 4. To address low water pressure supply to mill housing complex by install tower water tank complete with pumps and necessary pipping. 5. To accelerate Food Safety compliance and certification 6. To improve targeted Overall Equipment Efficiency (OEE) in Rate, Availability and Yield. 	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p>	<p>RSPO metrics template submitted was verified its data to be reflective of raw data sources from each operating units.</p>	Complied

	<p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>		
<p>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.</p> <p>- Critical (Major) compliance -</p>	<p>SOP was established for the Estates. Sime Darby SOP issued 02/01/2008 and Agricultural reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU18 as a guidance document to conduct estate operation. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Available a folder contained a Mill Quality Management System (Standard Operating Procedure). Version 1:2008. Included an operation of:</p> <ul style="list-style-type: none"> 1.0 Reception Station 2.0 Fruit Handling Station 3.0 Sterilization Station 4.0 Threshing Station 5.0 Pressing Station 6.0 Clarification Station 7.0 Depericarping Station 8.0 Kernel Recovery Station 9.0 Boiler Station 10.0 Power generation 11.0 Product Storage and Despatch 12.0 Laboratory 	<p>Complied</p>

		<p>13.0 Oil Recovery Station 14.0 Water Treatment Plant 15. Effluent treatment Plant</p> <p>Sime Darby has established a system to monitor the mill operation. The visited the operating units on timely basis. Their reports covers on all aspect of operation.</p> <p>For the estates, reviewed a folder of SOP maintain for Estate Quality Management System issue date 01/11/2008. The main category of the SOP under:</p> <ol style="list-style-type: none"> 1. Estate Upkeep and cultivation <ul style="list-style-type: none"> • Planning for replanting/new planting • Felling/clearing and land preparation • Weeding/Spraying-Mature • Weeding/Spraying-Immature • Road construction • Road Bridges, culverts • Soil and water conservation • Boundaries • Leguminous cover crops • Lining, holing, planting • Census/supplying • Thinning • Pests and dieses • Manuring • Water management 2. Harvesting and Collection 	
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		<ul style="list-style-type: none"> • Harvesting • D 12 Block Harvesting system • Ripeness standard • Division of labour. <p>Available a details SOP for operation covering safe working for application of fertilizer, SOP for Handling of machinery, SOP Harvesting, SOP for Prunning, SOP for Spraying, SOP for Chemical handling, SOP for Safe Driving, SOP for workshop and etc.</p> <p>Sime Darby has also updated the Standard Operating Procedure as follows:</p> <ol style="list-style-type: none"> 1. UM HSE Management System Manual – UM/HSE/MS/01 2. First Aid in Workplace Procedure – UM/HSE/OCP/01 3. Safe Harvesting Procedure – UM/HSE/OCP/02 4. Personnel Protective Equipment (PPE) Procedure – UM/HSE/OCP/03 5. Chemical Safety Management Procedure – UM/HSE/OCP/04 6. Permit to Work – UM/HSE/OCP/05 7. OSH Risk Management Procedure – UM/HSE/SP/01 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The monitoring of the mill and estates process is made through the supervision headed by Mill/Estates Manager. All process parameters are documented and summarized in a daily report.</p> <p>For mill, the Mill advisor, Structured Oil Recovery Assessment (SORA) and Planning and Monitoring Unit visited the operating units on timely basis. Their reports covers on all aspect of operation.</p> <p>For estates, Sime Darby Plantation has established mechanism to monitor the implementation of their procedure by Plantation</p>	<p>Non-compliance</p>

		<p>Advisor Visit, Performance Monitoring Visit and Agronomist Visit. The visit focusing on Yield Improvement, Crop Recovery, Replanting and Immature Palms Maintenance and Mature Upkeep. The Group Sustainability conducted Sustainability Internal Audit base on Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP.</p> <p>Noted during site visit at the harvesting gang, it was noted that the 2 items (cream) in the first aid box were not labelled with the items type and expiry date. This was against the First Aid in Workplace Procedure – UM/HSE/OCP/01 under section 10 First Aid Best Practice which stated as follows: “Supplies must be easier to identify for immediate use. Appendix 3 Recommended First Aid Box/ Kit Best Practice.</p> <p>There is no mechanism in place to check that the following SOPs are consistently implemented:</p> <ul style="list-style-type: none"> a. General Rules for Workers’ Housing at Tali Ayer Estate on the prohibition of sale and purchase of alcoholic drink; and b. Inter-Office Mail (Ref No. CEO/060/12/2020) from the CEO, Upstream Malaysia dated 29/12/2020 which requires that: <ul style="list-style-type: none"> • workers comply with disciplinary measures; and • housing surroundings are kept clean and safe. <p>It was found during the audit as follows:</p> <ul style="list-style-type: none"> a. At Tali Ayer Estate, Kedai Runcit Muniandy was selling alcoholic drinks to workers. This sale and purchase 	
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		<p>transactions were confirmed by representatives of Kedai Runcit Muniandy and some estate workers who were interviewed during the audit. The auditor also noted a can of Carlsberg stored in the fridge at the shop.</p> <ul style="list-style-type: none"> b. At Chersonese POM, although a risk assessment dated 30/03/2022 was done on garage structures at workers' housing, in particular Houses No. 10A and 14A, these structures remain in the same conditions and not repaired to reduce the risks identified. c. Previous building demolition site in front of Chersonese Palm Oil Mill housing is left littered with refuse, namely concrete construction debris which was not disposed of satisfactorily. There is also no hazard tape to demarcate the area. <p>Therefore, SOU 2 could not demonstrate that the General Rules for Workers' Housing SOP and contents of Inter-Office Mail from the CEO, Upstream Malaysia dated 29/12/2020 have been consistently implemented.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>Sime Darby Plantation has established mechanism to check the effective implementation of the procedure. Among the mechanism such as Mill/Plantation Advisor Visit, Performance Monitoring Visit, SORA/SCRA visit, Agronomist visit and Internal Audit.</p> <p>Reviewed the monitoring records maintained at the operating units office as follows:</p> <p>Chersonese POM</p> <ul style="list-style-type: none"> 1. Structured Oil Recovery Assessment FY 2022 Round 1 dated 27/06/2022 – 01/07/2022 2. RSPO + MSPO Internal Audit Report SOU 2 Dated 13/06/2022. 6 Major NC 1 Minor NC were raised. The mill 	Complied

		<p>has submitted the corrective action and evidence of implementation to auditor team on 02/07/2022 and accepted by the lead auditor on 13/07/2022.</p> <p>Chersonese Estate</p> <ol style="list-style-type: none"> 1. RSPO + MSPO Internal Audit Report SOU 2 Dated 13/06/2022. 2 Major NC, 2 Minor NC and 1 OFI were raised. The mill has submitted the corrective action and evidence of implementation to auditor team on 14/07/2022 and accepted by the lead auditor on 25/07/2022. 2. Performance monitoring Visit Summary report for visit conducted on 19/07/2022 3. Agronomist report conducted on 13 – 14/09/2022. Refer report Agronomic & Fertiliser Recommendation Report – Oil Palm dated 28/10/2021 <p>Tali Ayer Estate</p> <ol style="list-style-type: none"> 1. Agronomist report conducted on 20 – 21/12/2021. Refer report Agronomic & Fertiliser Recommendation Report – Oil Palm dated 24/02/2022 2. Performance monitoring Visit Summary report for visit conducted on 21/07/2022 3. Estate Structured Crop Recovery report dated July 2022 for visit dated 28/06/2022 <p>Holyrood Estate</p>	
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		<ol style="list-style-type: none"> 1. Estate mature upkeep assessment report dated July 2022 for visit conducted on 01/07/2022 2. Estate Structured Crop Recovery report dated July 2022 for visit dated 01/07/2022 3. Performance monitoring visit summary report dated 22/07/2022 <p>Kalumpong Estate</p> <ol style="list-style-type: none"> 1. Estate Structured Crop Recovery report dated 04/07/2022 for visit dated 30/06/2022 2. Performance monitoring visit summary report dated 20/07/2022 3. Plantation Advisory visit on 22 – 25/02/2022. Refer report no. NTR/SOU 2/KPE/02-2022 	
<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.</p> <p>- Critical (Major) compliance -</p>	<p>Environmental</p> <p>There is no new planting in the sampled estates. Nonetheless, the assessment of environmental impact of its existing activities is documented in the following documents:</p> <ul style="list-style-type: none"> • Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register • Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI 	<p>Complied</p>

		<p>Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE</p> <p>Social</p> <p>The estates and mill conducted Environmental Impact Assessment to identify the environmental aspect in all estate activities and documented in Environmental Aspects Impacts Identification form and Environmental Impacts Evaluation form. The assessment covers all activities in the estates and mill. The assessment was conducted base on SOP established. Refer SOP Standard Operation Manual; subsection 5.4; Planning and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure.</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>There is no new planting in SOU 2.</p> <p>Environmental</p> <p>Environment Aspect and Impact Identification for various activities such as construction work, compound, dispensary, field, harvesting and collection, main entrance, pest and disease control, petrol and diesel, power station, replanting, road, schedule waste store, workshop, boiler, effluent treatment plant, smoke emission, etc.</p> <p>After the EAI is completed, the Environmental Impact Evaluation is conducted to evaluate the impact severity using a format (Environmental Impact Evaluation Form). There are 3 classifications of impact established in order to justify the action plan (mitigations) required i.e.:</p> <table border="1" data-bbox="1151 1262 1904 1359"> <tr> <th colspan="2">Guidance of Action required</th> </tr> <tr> <td>100 ~ 199</td> <td>No action required</td> </tr> <tr> <td>200 ~ 249</td> <td>To initiate corrective and preventive actions</td> </tr> </table>	Guidance of Action required		100 ~ 199	No action required	200 ~ 249	To initiate corrective and preventive actions	<p>Non-compliance</p>
Guidance of Action required									
100 ~ 199	No action required								
200 ~ 249	To initiate corrective and preventive actions								

		<table border="1" data-bbox="1151 363 1904 430"> <tr> <td data-bbox="1151 363 1344 430">250 and above</td> <td data-bbox="1344 363 1904 430">To develop environmental objective and programme</td> </tr> </table> <p>Mitigation measures were documented in Pollution Preventive Plan (PPP).</p> <p>However, the environmental aspect at FFB receiving ramp was not adequately identified. The following lapses were found:</p> <p>i) Chersonese palm Oil Mill</p> <p>During the site visit at underneath the FFB receiving ramp, it was observed that there were pipelines to channel the rainwater from the FFB receiving ramp floor above to a monsoon drain flowing to the environment. The monsoon drain was also seen to be silted with palm fruitlets and debris. However, this environment interaction was not captured in the mill's "Environmental Aspects and Impact Identification Form" [doc. no.: EAI/2012-13/002/B] annually reviewed recent on 19/01/2022.</p> <p>ii) Holyrood Estate</p> <p>There were 10 empty pre-mixed chemical containers found to be left overnight at field no. 020A, Holyrood Estate during the field assessment visit. This is confirmed through an interview with a Pest and Disease spraying operator who was working there and the field staff. However, this matter was not risk assessed to identify the impact on environment.</p> <p>Thus, a non-conformity report was assigned.</p> <p>Social</p>	250 and above	To develop environmental objective and programme	
250 and above	To develop environmental objective and programme				

		<p>A Social Impact Assessment (SIA) for SOU 2 were carried out from 14-17 June 2015 by the Sustainability Strategy Unit, PSQM Department. The SIA was developed with the participation of affected parties such as external and internal stakeholders namely workers representatives, community leaders, workers, related govt agencies, staff, contractors, suppliers.</p> <p>Based on interviews conducted, documents reviewed and field observations during the audit, evidence was available that the social management and monitoring plans were developed with the participation of affected parties. They included inputs received during external stakeholders' meetings at Chersonese POM (on 22/06/2022), Chersonese Estate (on 21/06/2022) and at Kalumpong Estate (on 13/06/2022).</p> <p>Participation from internal stakeholders were obtained during Employees' Welfare Committee meetings, Social Dialogues, Gender Committee meetings, etc. Among the meetings sampled were social dialogues held at Holyrood Estate (on 21 July 2022, 25/06/2022 and 11/06/2022), and Gender Committee Meetings (on 27/04/2022 and 11/03/2022). At Kalumpong Estate, stakeholder inputs were also obtained during Gender Committee meetings (on 15/07/2022 and 20/05/2022) and at Tali Ayer Estate (on 20/07/2021.)</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Environmental</p> <p>The management plan established base on operation with significant impact to the environment. The management plan was reviewed annually. The management plan stated the environmental issue, mitigation actions, monitoring plan and person responsible for monitoring implementation.</p> <p>The operating units sampled have established the Environmental Management Program base on the significant impacts identified in</p>	Complied

		<p>the EAI/EIE conducted. The plan stated the Environmental issue, mitigating measures and person responsible. The plan was reviewed on annually basis.</p> <p>Updating of the progress of plan is carried out by the relevant persons in-charge and the results of the monitoring effectiveness are reviewed in the management units operating meetings. Mitigation measures were included in the environmental management plan and reviewed from time to time.</p> <p>Social</p> <p>SOU 2 was able to demonstrate that the social monitoring plan was implemented and reviewed at least annually, with participation of affected stakeholders namely, the workers (Employees' Welfare Committee meeting, Gender Committee, NUPW, feedback received during Social Dialogues, and meetings with external stakeholders.</p> <p>At Kalumpong Estate, the social management plan was updated annually with the latest update on 30/06/2022, i.e. after receiving feedback during external stakeholder meeting held on 13/06/2022.</p> <p>Among the updates in the management and monitoring plan included feedback from local community's request to understand the workings of an oil palm plantation and SK Sri Pinang's request for 200 lorries of earth to address flooded school field.</p> <p>At Chersonese POM, also included in its updated monitoring social plan was workers' need for a safe and comfortable living quarters with the installation of mosquito netting and road bumps to reduce road speeding.</p> <p>At Tali Ayer Estate, the monitoring was updated on 24/06/2022 addressing regular temple cleaning, provision of worker ID cards for use at panel clinics, etc.</p>	
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Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and available as follows:</p> <ul style="list-style-type: none"> a) SOPP Workforce Management Unit, WMU/LR-SOPP/JAN2016/R1 which provides the procedures for recruitment, selection and hiring. It includes steps to be taken to ensure foreign applicants with criminal record are filtered out. b) Hiring and selection of local workers, Doc No. 01-11-19 which details out the procedure of fill up job application forms, screening, interview, and medical check-up. c) Employment contracts (for foreign workers) and letters of job offer (for local workers) document the termination procedures d) Letters of job offer (for local workers) on retirement. Foreign workers is not subjected to retirement process because their employment would be dependent upon issuance of their annual work permits by the Immigration Department. e) Promotion is stipulated under SOP Doc No. SDP/HRUM/2020/SOP01 dated 1 Jan 2020. <p>The procedures were briefed to the workers during their induction course, and also during muster briefings.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>There is evidence that the employment procedures for local and foreign workers enumerated under Indicator 3.5.1 are being implemented, and employment records are maintained. All local applications are preceded with a job application form, relevant qualifications and certificates, job interview, records of medical</p>	Complied

		<p>check-up, and the issuance of letter of job offer. Sighted during the audits were employment records of the following workers:</p> <ul style="list-style-type: none"> A. Chersonese POM: Workers No. 56148, 26735, 26670, 167667, 163737, 53500, 158551, 15004, 15842, 15236, 32980, 33413. B. Chersonese Estate: Workers No. 16003, 32676, 15185, 82977, 116693, 116697, 116698, 146005, 153243, 161252, 114397, 125510, 107725, 113569 C. Kalumpong Estate: Workers No. 147642, 289942, 28977, 29033, 65401, 98263, 115049, 117318, 117340, 121408,124431,136454,148305. D. Tali Ayer Estate: Workers No. 163463, 80286, 28699, 28594, 28698, 170332, 165273, 166095, 165205, 28681, 64826, 104461, 110136. E. Holyrood Estate: Worker Listed (as per checkroll list) No. 3, 7,8,10, 11, 20, 21, 44, 62, 63, 71, 75, 76. 	
<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>Sime Darby has established the Upstream Malaysia Health, Safety and Environment (HSE) Policy Statement signed by the CEO, Upstream Malaysia dated 01/06/2020.</p> <p>In the Policy Statement stated the commitment to provide safe and healthy workplace and operating in an environmentally responsible manner at all their operation in Malaysia</p> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the mill and estate.</p> <p>Sime Darby has established SOP for OSH Risk management. Refer UM HSE Management System, OSH Risk Management Procedure</p>	<p>Complied</p>

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		<p>ver. 1, effective date 09/03/2021. Under section 10. Monitoring and Overview stated the review conducted when:</p> <ol style="list-style-type: none"> 1. Significant changes in work activity, process, practices or procedures 2. Change in working environment including changes in organization structure and personnel changes 3. Evidences that control measures are not working as intended e.g accidents, incidents, equipment's failure hazard reports and etc. 4. When directed by the Director General DOSH <p>The operating units has conducted assessment for risk covers all main operations and support operations. The HIRARC was reviewed at minimum once a year, if accident occur or changes on the operation.</p> <p>Reviewed the risk assessment as follows:</p> <p>Chersonese POM</p> <ol style="list-style-type: none"> 1. Latest Chemical Hazard Risk Assessment (CHRA) was conducted on 24/02/2020 by assessor with reg. no. HQ/09/ass/00/124. Refer report no. HQ/09/ASS/00/124 – 2020/0017. As per report, the mill were required to conduct Chemical Exposure Monitoring (CEM) for Hexane. The CEM was conducted on 12/05/2022 and 14/06/2022 by hygiene tech with reg. no. HQ/12/JHI/00/178. Refer report no. HQ/12/JHI/00/178-2022/32 dated 30/06/2022. Base on the report showed that the airborne concentration of personal chemical exposure monitoring were below than respective Permissible Exposure Limit (PEL) and not required medical surveillance. 	
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		<p>HQ/09/ass/00/124. Refer report no. HQ/09/ASS/00/124 – 2020/0013. Latest medical surveillance was conducted on 20 – 21/07/2022 and waiting for the results. The estate also conducted monthly health screening for chemical handlers. Reviewed the records dated 26/05/2022, 26/04/2022 and 26/03/2022.</p> <p>3. Latest HIRARC review was conducted on 18/03/2022 with review for frond stacker and loose fruit collector due to accident occur on 15/03/2022 and 13/01/2022 with review on store activities due to accident occur on 11/01/2022.</p> <p>Tali Ayer Estate</p> <ol style="list-style-type: none"> 1. The estate conducted the Noise Risk Assessment by 24/06/2020 by assessor with DOSH reg. no. HQ/18/PEB/00/00021. Base on the report, there's no requirement to conduct audiometric test annually as the Noise Exposure Limit is below Permissible Limit. 2. Latest Chemical Hazard Risk Assessment (CHRA) was conducted on 22/02/2020 by assessor with reg. no. HQ/09/ass/00/124. Refer report no. HQ/09/ASS/00/124 – 2020/0016. 3. Latest HIRARC review was conducted on 24/05/2022 with review for activities such as patrolling, FFB transportation, repair and maintenance of vehicle. For accident, the HIRARC was reviewed on 12/03/2022 due to accident occur on 08/03/2022 in harvesting operation. <p>Holyrood Estate</p>	
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		<p>The estate had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following:</p> <ul style="list-style-type: none"> - Change in work process - Revision/changes in legislative requirement - Occurrence of accidents <p>Based on the risk assessments, appropriate risk control measures were determined and implemented for the respective activities and operation</p> <p>Kalumpong Estate</p> <ol style="list-style-type: none"> 1. Latest Chemical Hazard Risk Assessment (CHRA) was conducted on 20/02/2020 by assessor with reg. no. HQ/09/ass/00/124. Refer report no. HQ/09/ASS/00/124 – 2020/0014. 2. The estate conducted the Noise Risk Assessment by 23/06/2020 by assessor with DOSH reg. no. HQ/18/PEB/00/00021. Base on the report, there’s no requirement to conduct audiometric test annually as the Noise Exposure Limit is below Permissible Limit. 3. Latest HIRARC review was conducted on 25/05/2022 with review for activities such as patrolling, FFB transportation, repair and maintenance of vehicle. 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>Chersonese POM</p> <p>The palm oil mill has established safety and health plan. Reviewed the implementation of the management plan as follows:</p>	Complied

		<ol style="list-style-type: none"> 1. As per CHRA report, the mill were required to conduct Chemical Exposure Monitoring (CEM) for Hexane. The CEM was conducted on 12/05/2022 and 14/06/2022 by hygiene tech with reg. no. HQ/12/JHI/00/178. Refer report no. HQ/12/JHI/00/178-2022/32 dated 30/06/2022. 2. Latest Local Exhaust Ventilation inspection, examination and testing was conducted on 27/04/2022 by hygiene tech with reg. no. HQ/11/JHII/00/173. Refer report no. HQ/11/JHII/00/173 2022/102. 3. The mill conducted medical check-up for the employee on monthly basis. Reviewed the records dated 21/04/2022, 24/03/2022 and 26/02/2022. 4. Mill has sent 2 employees to obtain competency on Authorized Entrant and Standby Person AESP and Authorized Gas Tester. Reviewed the AESP competency cards no. NW-NRO-AE-2378-U, NW-NRO-AE-2379-U and AGT letter of invitation and payment advice for training no. 02-01/01/AGTES/2022/21(900128-01-5487. <p>Chersonese Estate</p> <ol style="list-style-type: none"> 1. The estate has conducted due diligence for contractors on 13/01/2022. the program were organised by RSQM and attended by all contractors in SOU 2 2. The estate has conducted firefighting equipment monitoring on monthly basis. Reviewed the monitoring reports dated 04/07/2022, 06/06/2022, 09/05/2022 and 04/04/2022. 3. The estate conducted daily and weekly vehicle inspection and recorded in the Preventive Maintenance Vehicle 	
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		<p>reports. Reviewed the reports for the month of June and July 2022 during visit at the estate workshop.</p> <ol style="list-style-type: none"> 4. The estate conducted PPE inspection periodically to ensure the workers wear the PPE provided. Reviewed the PPE inspection records dated 05/06/2022 during morning muster. <p>Tali Ayer Estate</p> <ol style="list-style-type: none"> 1. The estate conducted inspection for health and safety requirement on weekly basis by Person In-charge of Accommodation and quarterly basis by employee welfare committee. Reviewed the inspection records conducted on 18 - 20/07/2022, 12/07/2022, 01/07/2022, 10 - 11/05/2022 and 08/02/2022. 2. The estate conducted first aid kit monitoring on monthly basis. Reviewed the monitoring records dated 20/07/2022, 24/06/2022, 26/05/2022 and 22/04/2022. 3. The estate conducted health screening on monthly basis for chemical handlers. Reviewed the health screening reports conducted by Medical Assistant dated 16 & 21/04/2022, 25 & 26/05/2022, 25 & 28/06/2022 and 21/07/2022. 4. The estate send chemical handlers for medical surveillance on annually basis. Latest surveillance was conducted by OHS with DOSH reg. no. JKKP IH 127/171-1(309). 14 workers were send for surveillance and found fit to work as chemical handlers. 5. The estate has conducted firefighting equipment monitoring on monthly basis. Reviewed the monitoring 	
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		<p>reports dated 30/04/2022, 30/05/2022, 20/06/2022 and 23/07/2022.</p> <p>Holyrood Estate</p> <p>As mentioned in Indicator 3.6.1, the CU has established and documented safety and health plan. Basically, the plans were derived from risk assessments such as HIRARC, CHRA, NRA, to name a few. The effectiveness of the plans was monitored in many ways such as:</p> <ul style="list-style-type: none"> - Internal audit - Workplace inspection (including field supervision) - Accident & incident reporting - Medical surveillance - Chemical exposure monitoring - Audiometric test - <p>Kalumpong Estate</p> <ol style="list-style-type: none"> 1. The estate reviewed the chemical register on annually basis. Latest review was conducted on 08/07/2022. Only chemical under class III and IV were used in the estate consistent as sighted in the chemical store. 2. The estate conducted PPE inspection for the workers on monthly basis. Reviewed the inspection records for sprayers, fertiliser applicator and drivers for the month of May, June and July 2022. 3. The driver inspect their vehicle/ machineries on daily basis before start works while the foreman conducted vehicle inspection on weekly basis and recorded in Preventive Maintenance Vehicle log book. Reviewed the inspection records for vehicle no TM 24 (in form no. 2152335, 	
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		2152338, 2153344 and 2152346) and TM 27 (in form no. 2321782, 2321784, 2321787 and 2321790).	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>© A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>All operation units within SOU 2 established and documented a training plan base on training need analysis conducted on annual basis. Sighted Training Schedule FY 2021 which covers all job designation including the contractors. The training program covers areas such as Safety, Environment and Management Systems.</p> <p>No scheme smallholders and out-growers within SOU 2.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p>Chersonese POM</p> <ol style="list-style-type: none"> 1. Chemical handling refresher training dated 22/02/2022 2. CHRA Briefing dated 24/02/2022 3. First Aid training 15/04/2022 4. E Sime Card System training dated 23/03/2022 5. Separate Oil Recovery Systems training dated 03/02/2022 6. Working at height training dated 26/01/2022 7. Contractors workers compliance requirements training dated 13/01/2022 8. Scheduled waste management training dated 23/07/2022 9. Backhoe and shovel training dated 23/06/2022 10. Lock Out, Take Out (LOTO) training dated 25/04/2022 11. Total Preventive Maintenance training dated 22/04/2022 <p>Chersonese Estate</p>	Complied

		<ol style="list-style-type: none"> 1. Scheduled Waste training dated 26/05/2022 2. Integrated Pest management training dated 13/07/2022 3. Hearing conservation training dated 28/06/2022 4. Chemical handling training dated 18/05/2022 5. Social dialogue reinforcement briefing dated 09/03/2022 6. Spraying SOP, safety and maintenance of INTER training dated 01/03/2022 7. Foreign workers vacation leave training dated 24/01/2022 8. First Aid training dated 17/12/2021 <p>Tali Ayer Estate</p> <ol style="list-style-type: none"> 1. First aid training dated 21/07/2022 2. Basic Occupational First Aid training (BOFA), CPR & AED training dated 11 – 12/11/2021 3. Fire extinguisher and firefighting training dated 20/07/2022 4. Scheduled Waste handling and storage training dated 14/03/2022 5. Noise risk assessment for workshop attendant training dated 29/06/2022 6. ILO, human rights, collective agreement, grievances channel, PPE awareness, new minimum wages, accident alert, near miss incident and privacy policy for contractors training dated 23/05/2022 7. ILO and RSPO reinforcement briefing dated 18/03/2022 8. Spraying technique and the safety aspects and the maintenance of Inter Sprayer training dated 01/12/2021 	
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		<p>9. Preventive maintenance vehicle training dated 08/12/2021 10. Spraying technique for mature field training dated 06/12/2021</p> <p>Holyrood Estate</p> <ol style="list-style-type: none"> 1. Safety and Preventive maintenance vehicle for new Carabou driver training dated 22/04/2022 2. IPM training dated 25/07/2022 3. Rat baiting application training dated 21/07/2022 4. Salary payment, calculation, and incentive benefit payment for harvester briefing dated 27/07/2022 5. Harvesting safety and frond stacking training dated 09/07/2022 6. Colour code harvesting training dated 15/02/2022 7. Spraying technique and the safety aspects and the maintenance of Inter Sprayer training dated 22/06/2022 8. Alion chemical mixing training dated 19/01/2022 9. SOP and PPE awareness for P&D spraying training dated 30/12/2021 10. PPE and safety training on manuring training dated 07/07/2022 11. SOP wearing and undress PPE for manuring and spraying workers training dated 03/01/2022 12. Repair work procedure training dated 06/07/2022 13. Chemical handling management and scheduled waste handling training date 22/04/2022 	
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		<p>Kalumpong Estate</p> <ol style="list-style-type: none"> 1. First aid box training dated 20 & 21/07/2022 2. Nursery culling and introduction on pest and disease training dated 26/01/2022 3. Nursery manuring application and polybag preparation training dated 14/03/2022 4. Fire extinguisher training dated 10/01/2022 5. Buffer zone, chemical handling and PPE awareness training dated 06/04/2022 6. Sime Darby Plantations policies briefing dated 07/02/2022 7. Learning form incidents dated 25 & 26/04/2022 and 15/06/2022 8. Scheduled waste management training dated 04/07/2022 9. Spraying technique and the safety aspects and the maintenance of Inter Sprayer training dated 08/03/2022 10. First aid kit training dated 04 & 05/01/2022 	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The mill continuously provided training to the personnel involved in SCCS. Reviewed the training records as follows:</p> <ol style="list-style-type: none"> 1. RSPO/MSPO and SCC training dated 20/07/2022 2. the RSPO SCC training was given to personal carried out the SCC such as Asst. Manager, chief clerk, clerk, weighbridge operator, laboratory personal and axillary police. Reviewed the training material includes all aspects of RSPO SCC 	Complied

Criterion 3.8: Supply chain requirement for mills
 (note: All supply chain requirements are considered as **Critical (C)**. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)

3.8.1	<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>As per Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section Glossary stated the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user uniquely identifiable to a single RSPO certified supply base. Refer document no. SD/SDP/GSD/SCCS/0522/01.</p> <p>The mill received FFB from uncertified source and adapt the Mass Balance Module. Thus, the criteria is not applicable.</p>	Complied				
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>As per Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section Glossary stated the meaning of RSPO Mass Balance as supply chain model that allows certified claim to be transferred from one palm oil products to another through physical blending or administratively under strictly control circumstances. Refer document no. SD/SDP/GSD/SCCS/0522/01.</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 the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>	Complied				
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The mill license available at PalmTrace as following:</p> <table border="1" data-bbox="1149 1294 1906 1390"> <tr> <td>License ID</td> <td>CB133023 (Active)</td> </tr> <tr> <td>Member Name</td> <td>Chersonese Oil Mill</td> </tr> </table>	License ID	CB133023 (Active)	Member Name	Chersonese Oil Mill	Complied
License ID	CB133023 (Active)						
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		<table border="1"> <tr> <td>Member ID</td> <td>RSPO_PO1000000302</td> </tr> <tr> <td>RSPO Membership Number</td> <td>1-0008-04-000-00 (Sime Darby Plantation Berhad)</td> </tr> <tr> <td>Type of Business</td> <td>Oil mill</td> </tr> <tr> <td>Issued On</td> <td>09-05-2022</td> </tr> <tr> <td>Issued By</td> <td>BSI Services Malaysia Sdn Bhd.</td> </tr> <tr> <td>Start Date</td> <td>01-05-2022</td> </tr> <tr> <td>End Date</td> <td>04-10-2022</td> </tr> <tr> <td>Certificate Holder Type</td> <td>Multi-Site</td> </tr> <tr> <td>Number of Sites</td> <td>4</td> </tr> <tr> <td>Total Certified Area (Ha)</td> <td>11099.36</td> </tr> </table>	Member ID	RSPO_PO1000000302	RSPO Membership Number	1-0008-04-000-00 (Sime Darby Plantation Berhad)	Type of Business	Oil mill	Issued On	09-05-2022	Issued By	BSI Services Malaysia Sdn Bhd.	Start Date	01-05-2022	End Date	04-10-2022	Certificate Holder Type	Multi-Site	Number of Sites	4	Total Certified Area (Ha)	11099.36	
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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> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 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 	<p>Sime Darby Plantation has develop Standard Operating Procedure (SOP) entitled Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. The following subjects were included in the procedure:</p> <ul style="list-style-type: none"> 4.0 Responsibilities 5.0 Control of Documents & Records 6.0 Delivery of FFB from the Estate 7.0 Receiving FFB at the Mill 9.0 Process Monitoring 10.0 Products Despatch 	Complied																				

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	<p>to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>11.0 Non-conforming Products and/ or Documents 12.0 Product Claims 13.0 Outsourced Contractor 14.0 Training 15.0 Reclassification of Mill’s Supply Chain Model 16.0 Production Volume 17.0 Conversion Factors 18.0 Internal Audit 19.0 Complaints 20.0 Management Review</p> <p>The mill management has appointed the Assistants Manager as person responsible to implement Supply Chain certification System in the mill as per appointment letter dated 01/04/2022 signed by the Mill Manager.</p> <p>Reviewed the records of implementation of RSPO SCC as follows:</p> <ol style="list-style-type: none"> 1. Latest Internal Audit was conducted on 13/06/2022 by Sr. Executive from Group Sustainability Compliance 2. Management Review Meeting minutes meeting conducted on 18/07/2022 3. FFB received, CPO and PK dispatch for weighbridge ticket no. 14/06/0200 and 18/07/2022 4. List of contractors, FFB suppliers and CPO/PK transport in Stakeholder List 	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p>	<p>The internal audit was conducted as per Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section 18.0 Internal Audit. Based on the procedure, the</p>	Complied

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	<p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP.</p> <p>Latest Internal Audit was conducted on 13/06/2022 by Sr. Executive from Group Sustainability Compliance. During the audit 2 non-conformity were raised. The mill has submitted the corrective action and evidence of implementation to auditor team on 02/07/2022 and accepted by the lead auditor on 13/07/2022.</p> <p>The internal audit report were discuss during Management Review Meeting. Review minutes meeting conducted on 18/07/2022</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>i) 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 certification status of the incoming FFB (RSPO Number & RSPO License Validity Period). Daily and monthly summary records were documented for all the incoming certified FFB. The mill received FFB from its own certified supply base, diversion from the other Sime Darby's certified estates and from non-certified third party FFB suppliers. The records of FFB received were recorded in FFB delivery/consignment note, FFB weighbridge ticket and summarised in the Mass Balance sheet.</p> <p>ii) The management will inform CB if there were any overproduction of certified tonnage. There has been no overproduction for the period under review.</p> <p>iii) 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</p>	<p>Complied</p>

		<p>the materials in such order: IP to MB to conventional. 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>3.8.8</p>	<p>Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Chersonese POM ensured the required information is available in document form. Verified the sampled Dispatch Delivery Notes as follows:</p> <p>Sales of CPO as RSPO Certified Product</p> <ul style="list-style-type: none"> a) The name and address of the buyer: non-disclosure b) The name and address of the seller: Sime Darby Plantation Berhad, KKS Chersonese, 34350 Kuala Kurau, Perak Darul Ridzuan c) The loading or shipment / delivery date: 14/06/2022 d) The date on which the documents were issued: 14/06/2022 e) RSPO certificate number: RSPO 590800 f) A description of the product, including the applicable supply chain model: Crude Palm Oil (CPO) - RSPO MB g) The quantity of the products delivered: 39.30 mt h) Any related transport documentation: weighbridge tickets, dispatch note, collection order, MPOB Form L3, etc. i) A unique identification number: available in all shipping documents i.e., weighbridge tickets, dispatch note, collection order, MPOB Form L3, etc. <p>Sales of PK as RSPO Certified Product</p> <ul style="list-style-type: none"> a) The name and address of the buyer: non-disclosure b) The name and address of the seller: Sime Darby Plantation Berhad, KKS Chersonese, 34350 Kuala Kurau, Perak Darul Ridzuan 	<p>Complied</p>

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		<ul style="list-style-type: none"> c) The loading or shipment / delivery date: 18/07/2022 d) The date on which the documents were issued: 18/07/2022 e) RSPO certificate number: RSPO 590800 f) A description of the product, including the applicable supply chain model: Palm Kernel (PK) - RSPO MB g) The quantity of the products delivered: 39.29 mt h) Any related transport documentation: weighbridge tickets, dispatch note, collection order, MPOB Form L3, etc. i) A unique identification number: available in all shipping documents i.e., weighbridge tickets, dispatch note, collection order, MPOB Form L3, etc. 	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. 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 	<p>The mill does not outsource any of its milling activities to any third party. With regards to the contracted CPO and PK transporters, it is stated in the contract agreement between Chersonese POM and the contractors in Annexure 5, RSPO Supply Chain Certification Standard, that the site has legal ownership of all input material to be included in outsourced processes.</p>	Complied

	relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Details of contractors are available in the list of contractors.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The list of contractors is updated from time to time by the mill. The information of any newly appointed contractor is shared with BSI through pre-audit information request prior to the audit. The information is provided to the assessment team.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. 	<ul style="list-style-type: none"> i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible. ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019. iii) NA as the mill is using MB model iv) All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded on a three-monthly basis in the mill's mass balance accounting sheet. The data was mostly sourced from the mill's Daily Production Report. However, based on the verification of the mill's mass balance account and sales registered in RSPO PalmTrace for the period under review (Jul 2021 to Jun 2022), it was found that the mill has sold more CPO (certified and non-certified) than it had produced. Based on the mill's mass balance accounting, the total production of CPO (certified and non-certified) is 32,509.31 mt while the total sales is 36,428.15 	Non-compliance

	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.	mt (5,338.65 mt as certified and 31,428.15 as non-certified). Thus, a non-conformity report was assigned due to this lapse.	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	Conversion factor of CPO and PK production is depending on the actual OER and KER. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on past experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on past experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	NA as the mill is using MB module.	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>	<p>i) The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace.</p> <p>ii) RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace</p>	Complied

	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.		
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Chersonese POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.). Thus, this indicator is not applicable.	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of 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. <p>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.</p>	No off-product claim made by Chersonese POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.). Thus, this indicator is not applicable.	Not Applicable
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.	No off-product claim made by Chersonese POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.). Thus, this indicator is not applicable.	Not Applicable

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.	No off-product claim made by Chersonese POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.). Thus, this indicator is not applicable.	Not Applicable
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 evidence of RSPO corporate logo used by Chersonese POM as verified through documentations and websites. Thus, this indicator is not applicable.	Not Applicable
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 invoices to the next supply chain actor or buyer.	Not Applicable
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 supply chain model and certificate number under which the claim is being made.	Chersonese POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable
5.3	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: 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.	Chersonese POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable

	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
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.	No business to consumer communication on product specific claim made. Chersonese POM only producing crude and unfinished product. This is not applicable for Chersonese POM.	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.	No business to consumer communication on product specific claim made. Chersonese POM only producing crude and unfinished product. This is not applicable for Chersonese POM.	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.	No business to consumer communication on product specific claim made. Chersonese POM only producing crude and unfinished product. This is not applicable for Chersonese POM.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made. Chersonese POM only producing crude and unfinished product. This is not applicable for Chersonese POM.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made. Chersonese POM only producing crude and unfinished product. This is not applicable for Chersonese POM.	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.	No business to consumer communication on product specific claim made. Chersonese POM only producing crude and unfinished product. This is not applicable for Chersonese POM.	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.	No business to consumer communication on product specific claim made. Chersonese POM only producing crude and unfinished product. This is not applicable for Chersonese POM.	Not Applicable

6.8	<p>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 applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>	<p>No business to consumer communication on product specific claim made. Chersonese POM only producing crude and unfinished product. This is not applicable for Chersonese POM.</p>	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES (delete if not applicable)			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Oil palm content is 100% CPO and claim as RSPO MB-certified.	Complied
	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.	Non-certified FFB is come from external crop and since Chersonese POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet. No RSPO credits used in Chersonese POM.	Complied
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'. 	Chersonese POM is producing crude palm product and does not involved in any labelling of end product.	Complied

	<ul style="list-style-type: none"> • 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). • 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>Chersonese POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</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>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The policy to respect human rights is documented in Sime Darby Plantation’s Human Rights Charter which incorporates, inter alia, commitment to providing equal opportunities, respecting freedom of association, eradicating any forms of exploitation, respecting community rights and rights of indigenous peoples, protecting rights of children, eliminating violence and sexual harassment.</p> <p>The policy to prohibit retaliation against Human Rights Defenders (HRDs) is documented in SDPB’s contained in the Policy on the Protection of Human Rights Defenders dated 25 March 2020. Paragraph 3.3 of this Policy provides protection against violence, threats and retaliation to HRDs and individuals acting in good faith to exercise their fundamental human rights, in the course of their engagement with SDP.</p> <p>These Policies were communicated to all levels of workforce during muster briefings, stakeholder meetings and Policy briefings. In addition, the Policy is also displayed at all the main notice boards throughout SOU 2.</p> <p>The trainings were held as follows: Chersonese POM: 26/11/2021, 24/11/21, 25/11/21</p>	<p>Complied</p>

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Revision 13 (Apr 2022)

		Chersonese Estate: 15/12/2021,08/03/2022, 09/03/2022, Kalumpong Estate: 15/07/2022, 20/05/2022. Tali Ayer Estate: 14/06/2022, 16/06/2022, 17/06/2022 Holyrood Estate:27/04/2022, 11/03/2022	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	There is no evidence of any use of violence or the instigation of violence within the SOU 2. This was further verified during interviews held with external stakeholders and security personnel.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(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. - Critical (Major) compliance -	The system used by SOU 2 in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues" dated 1 Nov 2008. Each operating unit each has its own Internal and External Complaint Books. Additionally, workers are now able to lodge complaints via several confidential channels such as Suara Kami Hotline, Whistleblowing, and Ulula. Suara Kami is an alternative independent third-party worker grievance channel with multi-languages and multi-interfaces (toll-free number, SMS and Facebook) that assures worker confidentiality unless personal details are required, where in such situations, consent will be sought. Complaints regarding house repairs can be submitted online by scanning a QR code via the Oil Palm Pal (OPP) system. Based on records sighted, requests for house repairs submitted via the OPP are being addressed in an effective and timely manner and acknowledged by the complainant. Social dialogues which are held twice a month between management and workers' representatives are also effective ways	Complied

		<p>of resolving disputes or grievances. This was confirmed by all workers interviewed. Among the sampled social dialogues were those held as follows:</p> <ul style="list-style-type: none"> A. Kalumpong Estate: 21/07/2022, 07/07/2022, and 16/06/2022. B. Chersonese POM: 15/06/2022, 29/06/2022, 10/06/2022, 25/05/2022, and 11/05/2022. C. Chersonese Estate: 15/07/2022, 30/06/2022 and 15/6/2022. <p>Sime Darby Plantation’s Policy on the Protection of Human Rights Defenders dated 25 March 2020 specifically provides for the protection of HRDs with the main objective of ensuring our internal mechanisms prevent harm, protect, and respond to complaints made by HRDs. Clause 3.3 of the Policy states that HRDs and individuals acting in good faith to exercise their fundamental human rights, in the course of their engagement with SDP shall be protected from violence, threats and all forms of retaliation.</p> <p>Anonymity of complainants and whistleblowers are ensured under the Sime Darby Code of Business Conduct which provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>SOU 2 ensures that affected parties including illiterate parties understand the procedures by giving regular briefings and displaying the flowchart at the main notice boards. Among the sampled briefings were as follows:</p> <ul style="list-style-type: none"> Chersonese POM: 26/11/2021, 24/11/21, 25/11/21. Chersonese Estate: 15/12/2021,08/03/2022, 09/03/2022. Kalumpong Estate: 15/07/2022, 20/05/2022. Tali Ayer Estate: 14/06/2022, 16/06/2022, 17/06/2022. 	Complied

		Holyrood Estate:27/04/2022, 11/03/2022.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	SOU 2 keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. Verified during the audit were complaint received from workers about house defects via the OPP system. The defects were rectified usually within 48 hours of complaints being lodged, and upon completion, acknowledgement by the respective complainants.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	Paragraph 7 of Appendix 5 Sustainable Plantation Management System, Flowchart and Procedure on Handling Social Issues Version 1, Year 2008, Issue No 1, Date 1 Nov 2008 states upon failure of negotiation process involving estate management, representatives from the disputed parties, zone heads, third parties and stakeholders, legal proceedings may follow. Paragraph 8 of Appendix 3 of the same document on procedures Handling Land Disputes states that "further negotiation processes may involve independent third parties such as representatives from the Land Office or from other NGOs."	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Contributions to community development are being provided based on local community consultations. The main contributions were: a. Providing job opportunities for the surrounding communities from Kuala Gula, Kuala Kurau, Bagan Serai & Parit Buntar. b. At Chersonese POM and Tali Ayer Estate, neighbouring communities are able to use the temples located within the company premises, .	Complied

		<ul style="list-style-type: none"> c. Mangrove replanting in collaboration with Sahabat Bakau, Kuala Gula in March 2022; and d. Cleaning of Ban Pecah in collaboration with Majlis Daerah Krian and local communities of Kg Parit 30. 	
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>Verified during the audit were documents showing legal ownership of the land as follows:</p> <ul style="list-style-type: none"> a. Chersonese POM is located within Chersonese Estate Lot # 4647; Area: 652.1 ha; Land title # 71380; District: Kerian, Sub-district, Mukim Kuala Kurau. b. Chersonese Estate hold a total of 35 land titles as per sample. Sighted during the surveillance audit were: <ul style="list-style-type: none"> - Title # 66254; Lot # 2389; Area: 52.5762 ha; District: Kerian; Sub-district: Mukim Kuala Kurau - Title # 50651; Lot # 2339; Area: 0.8675 ha; District: Kerian; Subdistrict: Mukim Kuala Kurau c. Holyrood Estate hold a total of 14 land titles as per sample sighted were: <ul style="list-style-type: none"> - Title # 48660; Lot # 1457; Area: 31.9069 ha; District: Selama; Sub-district: Mukim Hulu Ijok - Title # 58413; Lot # 2330/2331; Area: 125.9456 ha; District: Selama; Sub-district: Mukim Selama 	Complied

		<p>d. Kalumpong Estate hold a total of 14 land titles as per sample sighted were the following:</p> <ul style="list-style-type: none"> - Title # 25431; Lot # 3293; Area: 0.319 ha; District: Krian; Subdistrict: Mukim Selinsing - Title # 81187; Lot # 9159; District: Krian; Sub-district: Mukim Bagan Serai <p>e. Tali Ayer Estate hold a total of 35 land titles as per sample sighted were the following:</p> <ul style="list-style-type: none"> - Title # 149611; Lot # 10068; Area: 229.4218 ha; District:Krian ; Sub-district: Mukim Bagan Serai. - Title # 4036; Lot # 2871; area 10.8628 ha District: Krian; Sub-district: Mukim Parit Buntar 	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities’ and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Complied
4.4.2b	Evidence that the unit of certification has respected communities’ decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	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 -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	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 -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	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 -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	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 -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Complied

Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.

4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -</p>	<p>It was verified during the audit that no new planting and issues of customary land occurs in all estates within SOU 2 that requires FPIC process since the last audit.</p>	Not Applicable
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>It was verified during the audit that no new planting and issues of customary land occurs in all estates within SOU 2 that requires FPIC process since the last audit.</p>	Not Applicable
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>It was verified during the audit that no new planting and issues of customary land occurs in all estates within SOU 2 that requires FPIC process since the last audit.</p>	Not Applicable
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>It was verified during the audit that no new planting and issues of customary land occurs in all estates within SOU 2 that requires FPIC process since the last audit.</p>	Not Applicable
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>It was verified during the audit that no new planting and issues of customary land occurs in all estates within SOU 2 that requires FPIC process since the last audit.</p>	Not Applicable

	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 -	It was verified during the audit that no new planting and issues of customary land occurs in all estates within SOU 2 that requires FPIC process since the last audit.	Not Applicable
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 -	It was verified during the audit that no new planting and issues of customary land occurs in all estates within SOU 2 that requires FPIC process since the last audit.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	It was verified during the audit that no new planting and issues of customary land occurs in all estates within SOU 2 that requires FPIC process since the last audit.	Not Applicable
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 -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Not Applicable
4.6.2	(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. - Critical (Major) compliance -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Not Applicable

4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Not Applicable
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Not Applicable
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Not Applicable
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Not Applicable
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 -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Not Applicable
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	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC	Not Applicable

	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 -	process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	
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 -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Not Applicable
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 -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	It was verified during the audit that there are no issues of land dispute issue occurs in all estates within SOU 2 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed this information.	Not Applicable
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous FFB prices were available as per MPOB Daily FFB Reference Price Summary by Region (RM/Tonne); April 2022; Northern Region. The daily price was displayed at the weighbridge for suppliers to refer. There were no smallholders supplying directly	Complied

		to Chersonese POM, apart from collection centres and out-growers which among others CK Teik Enterprise and Tang Tatt.	
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>	FFB Pricing explanation is normally made through meeting with FFB suppliers of Chersonese Palm Oil Mill. Verified the latest meeting with FFB Suppliers conducted on 14/06/2022. There were no smallholders supplying directly to Chersonese POM, apart from collection centres and out-growers which among others CK Teik Enterprise and Tang Tatt.	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>	Fair pricing calculated based on MPOB Daily FFB Reference Price Summary by Region (RM/Tonne); April 2022; Northern Region. There were no smallholders supplying directly to Chersonese POM, apart from collection centres and out-growers which among others CK Teik Enterprise and Tang Tatt.	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>	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	The mill received FFB from its own certified supply base and occasionally diversion from other certified SOUs. The FFB supplier were listed in the Chersonese POM FFB Supplier list. There were no smallholders supplying directly to Chersonese POM, apart from collection centres and out-growers which among others CK Teik Enterprise and Tang Tatt. Contract between Sime Darby and the third-party FFB suppliers were made available for verification. Among the contents are FFB pricing, FFB standard and timing of payment, to name a few.	OFI

		Correspondences and contracts signed with contractors were prepared in English. Since the contractors are more conversant in Bahasa Malaysia, it is an opportunity for improvement for these contracts and all correspondences to be in Bahasa Malaysia.																									
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	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.	Complied																								
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	<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> <table border="1" data-bbox="1160 810 1816 997"> <thead> <tr> <th></th> <th>Details</th> <th>W/bridge 1</th> <th>W/bridge 2</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Capacity</td> <td>60,000 Kg</td> <td>60,000 kg</td> </tr> <tr> <td>2</td> <td>Serial Number</td> <td>B829135378</td> <td>B522989612</td> </tr> <tr> <td>3</td> <td>Certificate Number</td> <td>D 018796</td> <td>D 019127</td> </tr> <tr> <td>4</td> <td>Safety Label Number</td> <td>DE18008612</td> <td>DE18008618</td> </tr> <tr> <td>5</td> <td>Calibration date</td> <td>06/01/2022</td> <td>08/02/2022</td> </tr> </tbody> </table> <p>Calibrator: DE Metrology Sdn Bhd</p>		Details	W/bridge 1	W/bridge 2	1	Capacity	60,000 Kg	60,000 kg	2	Serial Number	B829135378	B522989612	3	Certificate Number	D 018796	D 019127	4	Safety Label Number	DE18008612	DE18008618	5	Calibration date	06/01/2022	08/02/2022	Complied
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5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	<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 is responsible to source potential external suppliers.</p> <p>Currently, there is no scheme smallholders program managed by Chersonese POM. Nonetheless, information about Sime Darby Plantation RSG programs is available via website link</p>	Complied																								

		https://sime-darbyplantation.com/sustainability/responsible-sourcing/	
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, the mill will handle 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
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
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>- 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 is responsible to source potential external suppliers. Currently, there is no scheme smallholders program managed by Chersonese POM. Nonetheless, information about Sime Darby Plantation RSG programs is available via website link https://sime-darbyplantation.com/sustainability/responsible-sourcing/</p>	Complied
5.2.2	<p>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).</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 is responsible to source potential external suppliers. Currently, there is no scheme smallholders program managed by Chersonese POM. Nonetheless, information about Sime Darby Plantation RSG programs is available via website link https://sime-darbyplantation.com/sustainability/responsible-sourcing/</p>	Complied

5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>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 is responsible to source potential external suppliers. Currently, there is no scheme smallholders program managed by Chersonese POM. Nonetheless, information about Sime Darby Plantation RSG programs is available via website link https://sime-darbyplantation.com/sustainability/responsible-sourcing/</p>	Complied
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) 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 is responsible to source potential external suppliers. Currently, there is no scheme smallholders program managed by Chersonese POM. Nonetheless, information about Sime Darby Plantation RSG programs is available via website link https://sime-darbyplantation.com/sustainability/responsible-sourcing/</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>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 is responsible to source potential external suppliers. Currently, there is no scheme smallholders program managed by Chersonese POM. Nonetheless, information about Sime Darby Plantation RSG programs is available via website link https://sime-darbyplantation.com/sustainability/responsible-sourcing/</p>	Complied

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>A Policy on equal opportunities and non-discrimination exists in SDP's Human Rights Charter 2020. Paragraph 3.2.5 of the HRC 2020 states that the Company would promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. It also states that the Company will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. Interviews conducted with workers confirmed the implementation of this Policy.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of houses at workers' housing and information obtained during audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated against.</p> <p>Review of the contracts entered with recruitment agents PT Wira Karitas (29/05/2022), PT Cipta Rezeki Utama (29/05/2022), PT Cahaya Lombok (29/05/2022), and PT Primadaya Pratama Pandukarya (29/05/2022) also state that no recruitment fee is payable by migrant workers. Interviews conducted with migrant workers from Indonesia also confirmed the that there is no discrimination and that they had not paid any recruitment fees.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>Operating units within SOU 2 was able to demonstrate that recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness</p>	Complied

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	<p>- Minor compliance -</p>	<p>appropriate for the job. Among the documents that are needed when applying for a job are job application form, identification documents, relevant certificates, medical test results. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate. These documents are contained in the workers' personal files. Among the sampled documents sighted belonged to the following workers:</p> <ol style="list-style-type: none"> 1. Chersonese POM: Workers No. 56148, 26735, 26670, 167667, 163737, 53500, 158551, 15004, 15842, 15236, 32980, 33413. 2. Chersonese Estate: Workers No. 16003, 32676, 15185, 82977, 116693, 116697, 116698, 146005, 153243, 161252, 114397, 125510, 107725, 113569 3. Kalumpong Estate: Workers No. 147642, 289942, 28977, 29033, 65401, 98263, 115049, 117318, 117340, 121408,124431,136454,148305. 4. Tali Ayer Estate: Workers No. 163463, 80286, 28699, 28594, 28698, 170332, 165273, 166095, 165205, 28681, 64826, 104461, 110136. 5. Holyrood Estate: Worker Listed (as per checkroll list) No. 3, 7,8,10, 11, 20, 21, 44, 62, 63, 71, 75, 76. 	
<p>6.1.4</p>	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Based on interviews with female workers, Estate Health Assistants and Medical Assistant, there was no evidence that pregnancy tests are being conducted as a discriminatory measure. Should a worker whose job comes into contact with chemicals, e.g., sprayers, or lab assistants become pregnant, she would immediately be re-assigned to an alternative job employment that doesn't involve contact with chemicals. As of the audit date, none of the estates employed any pregnant or ladies of child-bearing age to handle chemicals</p>	<p>Complied</p>

<p>6.1.5</p>	<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. - Critical (Major) compliance -</p>	<p>A gender committee is in place at all the operating units within SOU 2. Based on interviews with Gender Committee chairpersons and women workers and review of meeting minutes, it was evident that the Gender Committee has fulfilled its role in raising awareness, identify and address issues of concern for the women workers. Among the activities carried out by the Gender Committee include awareness briefings on sexual harassment, reproductive rights, domestic violence, how to lodge complaints and opportunities to improve members' income.</p> <p>Meetings are held at SOU and OU levels. Reviewed were SOU Gender Committee meetings held on 27/06/2022 & 26/02/2022. Other Gender Committee meetings were held as follows: At Holyrood Estate: 27/04/2022, 11/03/2022. At Kalumpang Estate: 15/07/2022 and 20/05/2022. At Tali Ayer Estate: 20/07/2022, 15/04/2022</p> <p>Gender-related issues such as domestic violence, sexual harassment and reproductive rights may also concern workers' wives who live within SOU 2 premises. As an opportunity for improvement, and to extend awareness on such issues to the workers' wives, Gender Committee membership be extended to include the workers' wives also.</p>	<p>Complied</p>
<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope. - Minor compliance -</p>	<p>Evidence was available of equal pay for the same scope of work. This was based on an e-mail from group Human Resources dated 19/05/2022 on the standardisation of minimum wages of RM1500 across SDP's operations w.e.f. May 2022 to be implemented to all operating units.</p> <p>This is also supported by letters of job offer and monthly pay slips reviewed for workers doing the same work, regardless of gender and nationality.</p>	<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).			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Applicable labour laws, documentation of pay and conditions are contained in in employment contracts (for migrant workers), letters of employment offer (for Malaysian workers). The contracts contain conditions of pay and terms of employment related to contract duration, regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. The employment contracts are signed in languages the workers are familiar with, namely English/Bahasa Malaysia/Hindi/Bengali.</p> <p>Workers interviewed also confirmed that they were briefed on the contents of their employment contracts and confirmed their understanding of the same.</p> <p>Records of trainings on the workers’ employment contracts, wage calculation, payslip, the ILO Convention and provisions of Minimum Wages Order 2022 were given as follows:</p> <ul style="list-style-type: none"> ➤ Chersonese POM: 25/05/22 and 12/05/2022. ➤ Chersonese Estate: 15/06/2022 ➤ Tali Ayer Estate: 18/03/2022 ➤ Holyrood Estate: 14/5/2022 and 08/06/2022. 	Complied
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</p>	<p>Based on the review of letters of appointment (for Malaysian workers) and employment contracts (for foreign workers) of the checkroll workers within SOU 2, these documents do provide detailed payments and conditions of employment. Statutory deductions are duly made. For non-statutory deductions such payments for water and electricity bills, written requests from</p>	Non-compliance

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	<p>compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>workers were available, and written approvals from the Labour Office were also sighted. For deductions, the following Labour Office approval was verified:</p> <p>For water: JTK.PK.(1)PMT (SEK 24) 10802 Jld 20(2) 30 April 2021; For electricity: BHG.PU/9/129 JLD 33 (53) dated 6 July 2017.</p> <p>However, the following have been found to be non-compliances:</p> <ol style="list-style-type: none"> Contractors at Kalumpang Estate had failed to demonstrate that they have complied with national legal requirements, namely Minimum Wages Order 2022 by not paying their workers minimum wages of RM1,500 in May and June 2022. <table border="1" data-bbox="1182 759 1906 1294"> <thead> <tr> <th>Contractor</th> <th>Workers</th> <th>Month of pay</th> <th>Basic pay (RM)</th> </tr> </thead> <tbody> <tr> <td rowspan="6">Joy Raj Enterprise</td> <td rowspan="2">680613-08-xxxx</td> <td>June 2022</td> <td>1,200</td> </tr> <tr> <td>May 2022</td> <td>1,200</td> </tr> <tr> <td rowspan="2">980114-08-xxxx</td> <td>June 2022</td> <td>1,250</td> </tr> <tr> <td>May 2022</td> <td>1,250</td> </tr> <tr> <td rowspan="2">840321-61-xxxx</td> <td>June 2022</td> <td>1,250</td> </tr> <tr> <td>May 2022</td> <td>1,250</td> </tr> <tr> <td rowspan="2">Sg Dungun Enterprise</td> <td>830407-08-xxxx</td> <td>May 2022</td> <td>1,100</td> </tr> <tr> <td>861212-35-xxxx</td> <td>May 2022</td> <td>1,100</td> </tr> </tbody> </table>	Contractor	Workers	Month of pay	Basic pay (RM)	Joy Raj Enterprise	680613-08-xxxx	June 2022	1,200	May 2022	1,200	980114-08-xxxx	June 2022	1,250	May 2022	1,250	840321-61-xxxx	June 2022	1,250	May 2022	1,250	Sg Dungun Enterprise	830407-08-xxxx	May 2022	1,100	861212-35-xxxx	May 2022	1,100	
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2. For contractor Oons Enterprise, the workers’ payslips for salary Jan, Feb, May and June 2022 could not demonstrate Oons Enterprise’s compliance with Employment Provident Fund Act 1991, Employees’ Social Security Act 1969, and Employment Insurance Scheme Act 2017 when it failed to make statutory deductions for EPF, SOCSO and EIS from Worker 590218-08-xxxx.
3. The following employment contracts signed between the contractors with their workers only mentioned that salary would be paid on a piece-rated basis. However, no rates were stated in the contract. The payslips reviewed also did not give accurate information on how the workers’ salaries were calculated.

Contractor	Workers	Date contracts	of	Payslips
Mano Enterprise	BS 880414-08-xxxx	01/01/2022		June 2022
				May 2022
				April 2022
				Mar 2022
				Feb 2022
Joy Enterprise	Raj 840321-61-xxxx	Jan 2021		June 2022
				May 2022
				April 2022

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				Mar 2022			
				Feb 2022			
				680613-08-xxxx	Jan 2022	June 2022	
						May 2022	
						April 2022	
						Mar 2022	
						Feb 2022	
				980114-08-xxxx	Jan 2021	June 2022	
						May 2022	
						Apr 2022	
						Mar 2022	
						Feb 2022	
				Oons Enterprise	891206-08-xxxx	02/01/2022	May 2022
							June 2022
							Feb 2022
<p>4. Employment contract dated 01/01/2019 signed between Sungai Dungun Enterprise and its worker (861212-35-xxxx) specified how his piece-rate is to be calculated. However, the payslips for June, May, April, March, Feb 2022 did not specify how his actual earnings were calculated.</p>							

<p>6.2.3</p>	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Based on sampled documents and worker interviews, there was evidence that regular working hours, deductions, sickness, holiday entitlement, maternity leave, are observed in accordance with the Employment Act 1955. This was verified from the workers' employment contracts, punch cards, payslips and interviews with the workers themselves. Workers are also entitled to at least 30 minutes' rest after 5 hours of work.</p> <p>Among the sampled documents and interviews conducted were of the following workers:</p> <p>Among the sampled documents sighted belonged to the following workers:</p> <ul style="list-style-type: none"> - Chersonese POM: Workers No. 56148, 26735, 26670, 167667, 163737, 53500, 158551, 15004, 15842, 15236, 32980, 33413. - Chersonese Estate: Workers No. 16003, 32676, 15185, 82977, 116693, 116697, 116698, 146005, 153243, 161252, 114397, 125510, 107725, 113569 - Kalumpong Estate: Workers No. 147642, 289942, 28977, 29033, 65401, 98263, 115049, 117318, 117340, 121408, 124431, 136454, 148305. - Tali Ayer Estate: Workers No. 163463, 80286, 28699, 28594, 28698, 170332, 165273, 166095, 165205, 28681, 64826, 104461, 110136. - Holyrood Estate: Worker Listed (as per checkroll list) No. 3, 7, 8, 10, 11, 20, 21, 44, 62, 63, 71, 75, 76. <p>Estate Health Assistants/Medical Assistant interviewed during the audit also confirmed that workers with medical certificates are given a paid medical leave, and female workers are given 3 months paid maternity leave.</p>	<p>Complied</p>
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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>Evidence is available that SOU 2 provides comfortable housing and facilities to its employees in accordance with the requirements of the national laws, which is the Employees’ Minimum Standards of Housing, Accommodation and Amenities Act 1990 (EMSHAAA 1990). Houses are provided rent free, and comes with subsidised water and electricity from the national grid. Each house has between 2 to 3 rooms and are kept in good state of repair. Surrounding areas and drains are kept clean. Among the available amenities include, children’s playground, football field, volleyball court, community hall, <i>surau</i>, temples for Hindus and Buddhists, and sundry shops.</p> <p>Estate clinics are managed by Medical and Health Assistants. All workers and their dependents have free access to these medical facilities. Records reviewed showed that the estates are visited by Visiting Medical Officer on a fortnightly basis, namely on 04/03/2022, 28/03/2022, 11/04/2022, 25/04/2022, 16/05/2022, 28/05/2022, 18/06/2022, 28/06/2022, 23/07/2022.</p> <p>Sampled weekly housing inspections were conducted as follows:</p> <ul style="list-style-type: none"> • At Tali Ayer Estate on 27/06/2022, 21/06/2022, 07/06/2022, 01/06/2022, 24/06/2022,18/05/2022 • • At Chersonese Estate on 25/07/2022, 18/07/2022, 11/07/2022, 04/07/2022 • At Holyrood Estate on 21/07/2022, 19/06/2022, 10/06/2022, 17/06/2022, 24/06/2022. • At Chersonese Mill on 21/07/2022, 13/07/2022, 06/07/2022 and 29/06/2022. 	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p>	<p>SOU 2 was able to demonstrate that efforts are made to improve workers’ access to adequate, sufficient and affordable food.</p>	Complied

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	<p>- Minor compliance -</p>	<p>Generally, the estates and mill are located near the towns of Selama and Kuala Kurau. Vehicles are provided twice monthly for workers to buy necessary provisions at the nearest towns. In addition, each operating unit also has its own sundry shops. Price monitorings are conducted regularly to ensure items sold are exorbitantly priced by making comparisons with essential items sold by other shops/supermarkets. Sampled were price comparisons done by Tali Ayer Estate and Kalumpang Estate in July 2022 and May 2022.</p>	
<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</p>	<p>All sampled workers receive at least minimum wages of RM1,100 based on Minimum Wages Order 2020 (up until April 2022) and RM1,500 based on Minimum Wages Order 2022 which came into effect in May 2022.</p> <p>SOU 2 has also carried out the calculation of prevailing wages and in-kind benefits. The calculation took into account basic pay, paid leave, incentives, medical benefits, rice, rental, maintenance and utilities, medical costs, transport, utilities, transport allowance, field and playground maintenance.</p> <p>The prevailing wage calculated for SOU 2 are:</p> <p>For Malaysian workers: RM2,153.34 For foreign workers: RM2,116.79</p> <p>The DLW calculation is higher than minimum wages of RM1,500 per month.</p>	<p>Complied</p>

	<p>with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment 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 workers employed within SOU 2 are fulltime employees with no casual, temporary and day labour.</p>	<p>Complied</p>
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa</p>	<p>Recognition of freedom of association is available in SDP's Human Rights Charter 2020. Paragraph 3.2.4 states commitment to respect freedom of association, respecting the rights of employees to form</p>	<p>Complied</p>

	<p>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>and join unions and bargain collectively. This Policy is displayed at the all main notice boards and explained to workers during Policy trainings as follows:</p> <ul style="list-style-type: none"> ➤ Chersonese POM: 25/05/22 and 12/05/2022. ➤ Chersonese Estate: 15/06/2022 ➤ Kalumpang Estate: 11/03/2022 ➤ Tali Ayer Estate: 18/03/2022 ➤ Holyrood Estate: 14/5/2022 and 08/06/2022. 	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Reviewed and verified during the audit were minutes of meetings which were documented and prepared in Bahasa Malaysia between each operating unit with NUPW representatives as follows:</p> <ul style="list-style-type: none"> - Chersonese POM on 01/06/2022. - Chersonese Estate on 20/04/2022. - Tali Ayer Estate on 21/07/2022. - Holyrood Estate on 07/03/2022. 	Complied
6.3.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Evidence was available that all worker representatives were freely appointed by the workers as confirmed by the workers' and the elected representatives themselves. The representatives were elected to represent the workers on various issues.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The formal Policy on protection of children and non-employment of children is contained in paragraph 3.3 of SDP's Human Rights Charter 2020. Paragraph 3.3.1 states that the Company would eradicate child labour in its supply chain and would not employ anyone below the age of 18 years.</p>	Complied

		Review of the contracts entered with recruitment agents PT Wira Karitas (29/05/2022), PT Cipta Rezeki Utama (29/05/2022), PT Cahaya Lombok (29/05/2022), and PT Primadaya Pratama Pandukarya (29/05/2022) contain provisions on the prohibition of child labour. Also included were contracts entered into with local contractors such as Joy Raj Enterprise, Sg Dungun Enterprise, Resam Padu Enterprise, and Safwan PA Enterprise.	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed. Observations made during audit visits also did not reveal the presence of any workers below the 18 years.	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	Based on workers' NRIC and passports, interviews and field observations, there was no evidence of the employment of any young persons within SOU 2.	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 Policy against Child Labour is available in SDPB's Human Rights Charter 2020. This Policy was communicated to its internal and external stakeholders as evidenced by minutes of stakeholder meetings and trainings as follows:</p> <ul style="list-style-type: none"> - Chersonese POM on 01/06/2022. - Chersonese Estate on 20/04/2022. - Tali Ayer Estate on 21/07/2022. - Kalumpang Estate on 11/03/ - Holyrood Estate on 07/03/2022. 	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			

<p>6.5.1</p>	<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. - Critical (Major) compliance -</p>	<p>The formal Policy on prevention of sexual and other forms of harassment and violence exists in SDP’s Human Rights Charter 2020. This Policy is displayed at all main notice boards throughout the CU.</p> <p>Paragraph 3.2.6 of the HRC Charter 2020 states that the Company would create a working environment with zero tolerance for sexual harassment and abuse, in which violence is never used to resolve issues or conflict. This was communicated to all levels of workforce at Chersonese Estate on 09/03/2022 for management level, 10/03/2022 for non-executive staff, and on 11/03/2022 for auxiliary staff. For workers, briefings were given during muster on 11/03/2022. Other additional trainings were held as follows:</p> <ul style="list-style-type: none"> - Chersonese POM on 01/06/2022. - Chersonese Estate on 20/04/2022. - Tali Ayer Estate on 21/07/2022. - Kalumpang Estate on 11/03/2022. - Holyrood Estate on 07/03/2022. 	<p>Complied</p>
<p>6.5.2</p>	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>The formal Policy to protect the reproductive rights of all, especially of women exists in SDP’s Human Rights Charter 2020. This Policy is displayed at all main notice boards throughout the CU. Paragraph 3.2.5 states that the Company would facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.</p> <p>This was communicated to all levels of workforce at Chersonese Estate on 09/03/2022 for management level, 10/03/2022 for non-executive staff, and on 11/03/2022 for auxiliary staff. For workers, briefings were given during muster on 11/03/2022. Other additional trainings were held as follows:</p>	<p>Complied</p>

		<ul style="list-style-type: none"> - Chersonese POM on 01/06/2022. - Chersonese Estate on 20/04/2022. - Tali Ayer Estate on 21/07/2022. - Kalumpang Estate on 11/03/2022. - Holyrood Estate on 07/03/2022. 	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>The needs of new mothers were assessed using a form known as the "New Mother Assessment Form". Below were two assessment forms sampled at Tali Ayer Estate dated 20 July 2022 on two new mothers who required baby-sitting services while they are at work. Interviews conducted confirmed that the said needs have been provided to the new mothers.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>A grievance mechanism which respects anonymity and protects complainants is in place at the CU as per the Sime Darby Gender Committee Handbook 1st Edition 2014.</p> <p>Additionally, SDP has also established Suara Kami. According to the SOP for Suara Kami Helpline, this is an alternative independent third-party worker grievance channel with multi-languages and multi-interfaces (toll-free number, SMS and facebook) that assures worker confidentiality unless personal details are required, where in such situations, consent will be sought by the system receiver.</p>	Complied
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution 	<p>All units within SOU 2 were able to demonstrate that all sampled workers have entered into employment voluntarily. Foreign workers (harvesters, sprayers, manurers, mill workers etc), have not been subjected to contract substitution and no discriminatory practices against foreign workers was observed. This is based on interviews with the workers. This is based on the following:</p>	Complied

	<ul style="list-style-type: none"> • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> - Review of sampled employment contracts which contain mutually agreed termination clause and no penalty payable for termination of employment. - All migrant workers keep their own passports in a safe locker in their own rooms. - Review of recruitment agency contract between Sime Darby Plantation Berhad and PT Wira Karitas (29/05/2022), PT Cipta Rezeki Utama (29/05/2022), PT Cahaya Lombok (29/05/2022), and PT Primadaya Pratama Pandukarya (29/05/2022) where no recruitment fee is payable by the workers and confirmed by the workers. - Records of punch cards, overtime application forms from workers, and workers confirmation that overtime work is mutually agreeable and not forced on them. - Confirmation from the foreign workers that they received accurate briefing in their home country on the job they would be doing in Malaysia; - Confirmation from the workers that there is no debt bondage or withholding of wages. 	
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>Employment procedures for foreign workers exists under SOPP Workforce Management Unit, WMU/LR-SOPP/JAN2016/R1 which provides the procedures for recruitment, selection and hiring. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc.</p> <p>Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there is no evidence of contract substitution and no discriminatory practices against foreign workers. As sampled from the workers' employment file, post-arrival briefings</p>	Complied

		were also given, in particular on the contents of their employment contracts, safety, benefits, etc.																
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.																		
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The respective Sr. Managers/ Managers in Operating Unit in SOU 2 has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per Safety and Health Committee Procedures, ver. 0 dated 17/11/2021 under section 4. Roles & Responsibilities and section 6. Composition of Safety and Health Committee under subsection 6.2. Appointment of Chairman, Secretary and Other Members. Refer doc. No. UM/HSE/OCP/08.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training.</p> <p>The operating units conducted safety and health committee meeting as per Safety and Health Committee Procedures, ver. 0 dated 17/11/2021 under section7. Meetings of Safety and health Committee under subsection 7.1. Frequency of Meetings of Committee. Reviewed the minutes meeting conducted for every operating units as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>03/2021</th> <th>04/2021</th> <th>01/2022</th> <th>02/2022</th> </tr> </thead> <tbody> <tr> <td>Chersonese POM</td> <td>10/08/2021</td> <td>10/11/2021</td> <td>25/02/2022</td> <td>25/05/2022</td> </tr> <tr> <td>Chersonese Estate</td> <td>24/09/2022</td> <td>11/12/2021</td> <td>25/03/2022</td> <td>25/06/2022</td> </tr> </tbody> </table>		03/2021	04/2021	01/2022	02/2022	Chersonese POM	10/08/2021	10/11/2021	25/02/2022	25/05/2022	Chersonese Estate	24/09/2022	11/12/2021	25/03/2022	25/06/2022	Complied
	03/2021	04/2021	01/2022	02/2022														
Chersonese POM	10/08/2021	10/11/2021	25/02/2022	25/05/2022														
Chersonese Estate	24/09/2022	11/12/2021	25/03/2022	25/06/2022														

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		Tali Ayer Estate	29/10/2021	18/12/2021	23/03/2022	24/06/2022	
		Holyrood Estate					
		Kalumpong Estate	23/09/2021	20/12/2021	17/03/2022	07/06/2022	
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>Sime Darby plantation has established Accident and emergency procedures under procedure as follows:</p> <ol style="list-style-type: none"> 1. Incidents, Accidents and Non-compliance Management Procedures, ver. 1, dated 01/06/2022. Refer doc. no. UM/HSE/SP/03 2. Emergency Preparedness Response Procedure, ver. 0, dated 17/11/2021. Refer doc. no. UM/HSE/SP/02 3. First Aid in Workplace Procedure, ver. 0, dated 09/03/2021. Refer doc. No. UM/HSE/OCP/01 <p>The purpose of the procedure is to ensure effective preparedness and necessary responses are available to deal with all potential emergency situation and accidents within Sime Darby Plantation – Upstream Malaysia to prevent or minimise losses to life, property and environment.</p> <p>The operating units maintain the records of accidents including JKKP 6 forms reported to DOE, medical leaves certificates, accidents investigations reports and HIRARC review. The accidents occurrence were reported to the Headquarters through Rapid 4 systems and DOSH by submitting the JKKP 6 form through MyKKP system.</p> <p>Chersonese POM</p>					Complied

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		<p>The mill conducted fire equipment inspection on quarterly basis. reviewed the inspection records as follows:</p> <ol style="list-style-type: none"> 1. Fire hose reel dated monitoring log records dated 16/05/2022, 11/03/2022 and 07/01/2022, 2. Fire hydrant monitoring log records for the month of 10/05/2022, 08/01/2022 3. Fire extinguisher monitoring log records 08/07/2022, 04/05/2022 and 15/03/2022. <p>The mill continuously conducted training to ensure competency of first aider. Reviewed the training records as follows:</p> <ol style="list-style-type: none"> 1. First Aid training 15/04/2022 2. Basic Occupational First Aid (BOFA) CPR and AED training dated 11 – 12/11/2022 <p>Reviewed the first aider competency certificate as follows:</p> <ol style="list-style-type: none"> 1. (PCA01)17849 2. (PCA01)17850 3. (PCA01)17851 4. (PCA01)17852 5. (PCA01)17854 <p>The mill conducted firefighting training on annually basis. ERT and fire drill training dated 09/02/2022 and 20/07/2022 with evacuation time recorded at 5 minutes</p> <p>The mill conducted first aid kit monitoring on monthly basis. Reviewed the latest monitoring records dated 11/06/2022. Noted during interview, the first aider understanding on the first aid treatment were acceptable. The workers interviewed aware of the designated location of first aid kit.</p>	
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		<p>Chersonese Estate</p> <p>The estate has conducted firefighting equipment monitoring on monthly basis. Reviewed the monitoring reports dated 04/07/2022, 06/06/2022, 09/05/2022 and 04/04/2022.</p> <p>The estate conducted firefighting training on annually basis. Reviewed the training records dated 07/07/2022. Noted during interview with workers, the understanding to use firefighting equipment was satisfactory.</p> <p>The estate conducted first aid kit monitoring on monthly basis. reviewed the monitoring dated 23/07/2022, 25/06/2022, 25/05/2022 and 25/04/2022</p> <p>The estate continuously conducted training to ensure competency of first aider. Reviewed the training records titled First Aid training 11 - 12/11/2021. Reviewed the first aider competency certificate as follows:</p> <ol style="list-style-type: none"> 1. (PCA01)17856 2. (PCA01)17840 3. (PCA01)17841 4. (PCA01)17843 5. (PCA01)17838 <p>Tali Ayer Estate</p> <p>The estate has conducted firefighting equipment monitoring on monthly basis. Reviewed the monitoring reports dated 30/04/2022, 30/05/2022, 20/06/2022 and 23/07/2022. The estate conducted firefighting training on annually basis. Reviewed the training records titled Fire extinguisher and firefighting training dated 20/07/2022.</p>	
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		<p>The estate has conducted firefighting equipment monitoring on monthly basis. Reviewed the monitoring reports dated 07/04/2022, 19/05/2022, 21/06/2022 and 23/07/2022.</p> <p>The estate conducted firefighting training on annually basis. Reviewed the training records titled Fire extinguisher and firefighting training dated 10/01/2022. Noted during interview with workers, the understanding to use firefighting equipment was satisfactory.</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>- Critical (Major) compliance -</p>	<p>The mill and estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per CHRA report, HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008.</p> <p>All workers in the operating units have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge.</p> <p>During the field visit to the Spraying Gang, Harvesting Gang and Manuring Gang at the estate and Laboratory, Boiler Station and Workshop at the mill, it was sighted that all required appropriate PPEs were worn by the personals. The understanding on importance of PPE were acceptable among the workers.</p> <p>The estates has 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.</p> <p>The estate conducted PPE inspection periodically to ensure the workers wear the PPE provided. Reviewed the PPE inspection records conducted during morning muster at all estates visited</p>	Complied

<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. Reviewed on workers profile records found that all workers are covered by the accident insurances.</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual Caruman" for the month of April, May and June 2022</p> <p>For accident eligible for SOCSO claim, the operating units has made claim to SOCSO. Reviewed the application as follows:</p> <p>Chersonese Estate</p> <ol style="list-style-type: none"> 1. Application letter and "Borang 34 – Butiran Notis dan Tuntutan Faedah" for accident occur on 11/01/2022 submitted to SOCSO on 14/02/2022. 2. Application letter and "Borang 34 – Butiran Notis Kemalangan dan Penyakit Khidmat Pekerja Asing" for accident occur on 15/03/2022 submitted to SOCSO on 27/05/2022 <p>Tali Ayer Estate</p> <ol style="list-style-type: none"> 1. Application letter and "Borang 34 – Butiran Notis Kemalangan dan Penyakit Khidmat Pekerja Asing" for accident occur on 08/03/2022 and letter notification of payment from SOCSO as per letter ref. no. D4 2HUS220001106 dated 21/04/2022. <p>Holyrood</p> <p>Should there be any medical care needed by the employees, clinics with certified Medical or Hospital Assistants in-charge were provided at all the sampled management units. Based on site visits, all the clinics were well maintained and managed. Records of medical</p>	<p>Complied</p>
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		<p>inventory, VMO visits and patients treated were made available for verification.</p> <p>The sampled estates and mill are subscribing to SOCSO to cover the accident insurance for all their workers. Latest monthly contributions were verified and confirmed the following details:</p> <table border="1" data-bbox="1137 555 1787 751"> <thead> <tr> <th>Transaction date</th> <th>Payment voucher Ref. No.</th> <th>No. of employees covered</th> <th>Amount (RM)</th> </tr> </thead> <tbody> <tr> <td>15/07/2022</td> <td>MYFL220702656655</td> <td>109</td> <td>4,484.00</td> </tr> </tbody> </table>	Transaction date	Payment voucher Ref. No.	No. of employees covered	Amount (RM)	15/07/2022	MYFL220702656655	109	4,484.00					
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15/07/2022	MYFL220702656655	109	4,484.00												
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2021 as reported to DOSH as follows:</p> <table border="1" data-bbox="1137 979 1921 1337"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> <th></th> </tr> </thead> <tbody> <tr> <td>Chersonese POM</td> <td>7</td> <td>54</td> <td>JKPP 8/ 111091/2021 dated 28/01/2022</td> </tr> <tr> <td>Chersonese Estate</td> <td>7</td> <td>78</td> <td>JKPP 8/ 93325/2021 dated 05/01/2022</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA		Chersonese POM	7	54	JKPP 8/ 111091/2021 dated 28/01/2022	Chersonese Estate	7	78	JKPP 8/ 93325/2021 dated 05/01/2022	Complied
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		Tali Ayer Estate	0	0	JKKP 8/ 10371/ 2021 dated 24/01/2022	
		Holyrood Estate	0	0	-	
		Kalumpong Estate	0	0	JKKP 8/ 108982/ 2021 dated 26/01/2022	

Principle 7: Protect, conserve and enhance ecosystems and the environment

Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators.</p> <p>The estates has established IPM program. The plan was reviewed on annually basis. Among the IPM plant established as follows:</p> <table border="1"> <thead> <tr> <th>Objective</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>To planting beneficial plant 2dm per ha</td> <td> <ul style="list-style-type: none"> To do census for monitoring To prepare and propagate seedling at nursery </td> </tr> </tbody> </table>	Objective	Action Plan	To planting beneficial plant 2dm per ha	<ul style="list-style-type: none"> To do census for monitoring To prepare and propagate seedling at nursery 	Complied
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		<p>Ganoderma disease</p>	<ul style="list-style-type: none"> • To train workers to doing census • To do census yearly 		
		<p>Barn owl box</p>	<ul style="list-style-type: none"> • To have census 6 monthly for owl population 		
		<p>Pest and disease control</p>	<ul style="list-style-type: none"> • Regular census to be carried out to monitor new infestation of bagworm/ nettle caterpillar • To carry out trunk injection/ spraying if necessary 		
		<p>Rat Attack</p>	<ul style="list-style-type: none"> • Spot baiting application if any damage • To use 1st generation bait 		
		<p>Reviewed the implementation of the plans as follows:</p> <p>Chersonese Estate</p> <ol style="list-style-type: none"> 1. Chersonese Estate The estate conducted Ganoderma census once a year. Review the report dated 15/06/2022. <p>Tali Ayer Estate</p> <ol style="list-style-type: none"> 1. Barn Owl Box census was conducted once every 6 months. Reviewed the census records conducted on 17/03/2021 with barn owl box ratio at 1:38.61 ha, occupancy rate at 33% and rodents attack below threshold level @ <5%. 2. Ganoderma census was conducted once a year. Latest Ganoderma census was conducted on 11/06/2021. With percentage of infected palms recorded at 3.91%. 			

		<p>Holyrood Estate</p> <ol style="list-style-type: none"> 1. Current barn owl box ratio per hectare in the estate recorded at 1:10 ha. Latest barn owl box census was conducted in May 2022 with occupancy rate recorded at 56%. 2. The estate plant beneficial plant as preventive measure for pest control. Reviewed the beneficial plan planting records dated 15/06/2022 recorded at 0.18 dm/ha. <p>Kalumpong Estate</p> <ol style="list-style-type: none"> 1. Latest barn owl box census was conducted in June 2022 with occupancy rate recorded at 62%. 	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p> <p>In SOU 2, 3 plant species were used for IPM such as <i>Tunera subulata</i>, <i>Cassia cobanensis</i>, and <i>Antigonan leptopus</i>.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>No evidence and records of fire usage for pest control at all estate visited.</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 3.2: Protect and enhance forest:</p> <p>“We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <p>ix. Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as protective firefighting measures in and around our operation.”</p>	Complied

Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																																						
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The 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.</p>	Complied																																			
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides 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 a.i/ha for chemicals used in 2022 as below: -</p> <table border="1"> <thead> <tr> <th>Operating Unit</th> <th>Chersonese Estate</th> <th>Tali Ayer Estate</th> <th>Holyrood Estate</th> <th>Kalumpong Estate</th> </tr> </thead> <tbody> <tr> <td>Jan 2022</td> <td>0.36</td> <td>0.424</td> <td>0.03</td> <td>1.92</td> </tr> <tr> <td>Feb 2022</td> <td>0.67</td> <td>0.257</td> <td>0.11</td> <td>4.50</td> </tr> <tr> <td>Mar 2022</td> <td>0.68</td> <td>0.441</td> <td>0.14</td> <td>2.92</td> </tr> <tr> <td>Apr 2022</td> <td>1.17</td> <td>0.260</td> <td>0.16</td> <td>2.82</td> </tr> <tr> <td>May 2022</td> <td>1.09</td> <td>0.395</td> <td>0.12</td> <td>2.09</td> </tr> <tr> <td>Jun 2022</td> <td>0.93</td> <td>0.478</td> <td>0.11</td> <td>2.19</td> </tr> </tbody> </table>	Operating Unit	Chersonese Estate	Tali Ayer Estate	Holyrood Estate	Kalumpong Estate	Jan 2022	0.36	0.424	0.03	1.92	Feb 2022	0.67	0.257	0.11	4.50	Mar 2022	0.68	0.441	0.14	2.92	Apr 2022	1.17	0.260	0.16	2.82	May 2022	1.09	0.395	0.12	2.09	Jun 2022	0.93	0.478	0.11	2.19	Complied
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Agriculture Reference Manual (ARM), Section 15 Plant Protection [Issue No. 1, Version 3,</p>	Complied																																			

		<p>dated 01/07/2011] and Section 16 Weed Control [Issue No. 1, Version 3, dated 01/07/2011].</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>The implementation in the field is consistent with the SOP established. Among the IPM plans implemented by the estates were establishment of beneficial plants (e.g., antigonan, tunera and cassia) and barn owl (Tyto alba).</p> <p>Sighted during the site visit at 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>	
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 the estates.</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> <p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p>	<p>Sighted in the Chemical Registers showed that only class III & IV chemicals were used at the estates. During the site visit to the chemical store it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used.</p> <p>Chersonese Estate</p> <p>Reviewed the Chemical Register dated 01/03/2022. Noted only chemical under class III and IV were stored in the estate.</p>	Complied

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	<p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <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>The estate use chemical Acephate to replace Monocrotophos for bagworm treatment. Reviewed purchasing and usage permit no. GL 21110085 from DOA dated 20/11/2021.</p> <p>Tali Ayer Estate</p> <p>Reviewed the Chemical Register dated 22/06/2022. Noted only chemical under class III and IV were stored in the estate.</p> <p>Kalumpong Estate</p> <p>The estate reviewed the chemical register on annually basis. Latest review was conducted on 08/07/2022. Only chemical under class III and IV were used in the estate consistent as sighted in the chemical store.</p>	
<p>7.2.6</p>	<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>The estate keep the training records as per criteria 3.7.2.</p>	<p>Complied</p>
<p>7.2.7</p>	<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 estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation</p>	<p>Complied</p>

		available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Empty pesticides container were identified as recycle waste. All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors. The estates maintain the inventory records of empty pesticides containers. Sighted the records for as to date July 2022. Reviewed the latest disposal records for Chersonese Estate disposed through licensed contractors by E-Idaman Sdn. Bhd. as per weighbridge ticket no. 2407 dated 25/07/2022, 2380 dated 29/06/2022 and 2376 dated 22/06/2022. Reviewed the latest disposal records for Tali Ayer Estate disposed through licensed contractors by Dhakshinamoorthy Manufacturing as per invoice no. INV/SW 26/2021 dated 04/08/2021 and payment voucher no. 16000007625.	Complied
7.2.9	(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. - Critical (Major) compliance -	No evidence of aerial spray conducted at the estate visited.	Not Applicable
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	The estates conducted health screening for all chemical handlers on monthly basis. the estates also send the chemical handlers for medical surveillance to ensure all workers are fit to works as chemical handlers. Chersonese Estate Latest medical surveillance was conducted on 20 – 21/07/2022 and waiting for the results. The estate also conducted monthly health	Complied

		<p>screening for chemical handlers. Reviewed the records dated 26/05/2022, 26/04/2022 and 26/03/2022.</p> <p>Tali Ayer Estate The estate send chemical handlers for medical surveillance on annually basis. Latest surveillance was conducted by OHS with DOSH reg. no. JKPP IH 127/171-1(309). 14 workers were send for surveillance and found fit to work as chemical handlers.</p> <p>The estate conducted health screening on monthly basis for chemical handlers. Reviewed the health screening reports conducted by Medical Assistant dated 16 & 21/04/2022, 25 & 26/05/2022, 25 & 28/06/2022 and 21/07/2022.</p> <p>Holyrood Estate Last medical surveillance was conducted 07/06/2022 by OHD [Reg. No.: JKPP IH 127/171-1(300)]. Based on the report, all four workers were found to be medically fit.</p> <p>Kalumpong Estate The estate conducted health screening on monthly basis for chemical handlers. Reviewed the health screening reports conducted by Medical Assistant dated 28 & 30/05/2022, 27 & 30/06/2022 and 27 & 28/07/2022.</p> <p>The estate send chemical handlers for medical surveillance on annually basis. Latest surveillance was conducted by OHS with DOSH reg. no. JKPP IH 127/171-1(309) on 06/04/2022. 17 workers were send for surveillance and found fit to work as chemical handlers</p>	
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7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>All estates have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on January 2015.</p> <p>It was sighted during the visit to the stores there were signage stating that pregnant and breast-feeding women are not allowed to enter the chemical stores.</p> <p>There were no female workers assigned for chemical related works in the three estates visited.</p>	Complied												
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.															
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>SOU 02 Chersonese POM and supply bases had identified all wastes and sources of pollution. The Waste Management Action Plans 2022 were established to mitigate and control the identified wastes and source of pollution. Among the significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1137 954 1921 1362"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <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>2</td> <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>3</td> <td>Land</td> <td>Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.	Complied
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		<p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2022. The waste generated from the mill/estates operations as shown below:</p> <table border="1" data-bbox="1144 568 1928 783"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill/estate complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fibre, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>The pollution identified from the mill/estates' activities:</p> <table border="1" data-bbox="1144 895 1928 1074"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>Emission from Boilers/vehicles/engines</td> </tr> <tr> <td>2</td> <td>Odour & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table>		Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill/estate complex and employees' quarters	3	Industrial waste	Fibre, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex		Type of waste	Details	1	Black smoke	Emission from Boilers/vehicles/engines	2	Odour & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance	
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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>Generally, the workers have demonstrated good understanding in proper disposal of wastes. The visited labour quarters were observed to be in clean condition. Wastes were properly disposed as mentioned in Indicator 7.3.1.</p> <p>SW disposed through licensed contractors which were verifiable through eSwis. Spent lubricants (SW305), spent hydraulic oil (SW306) and contaminated rags (SW410) were taken by the service provider (SDI) to their premises. DOE's approval for this practice was made available for verification.</p>	Complied																											

7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in SOU 2 by burning ever since Sime Darby Plantation practiced zero burning as per the policy in:</p> <p>a) EQMS SOP Section-B2 under felling/clearing & land preparation b) Carbon Policy</p> <p>As advocated, the estates practiced zero burning. Based on site visit at the replanting fields, it was evident that all palms were felled, chipped, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.</p>	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.</p> <p>The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents;</p> <p>a) EQMS chapter B8 - Leguminous Cover Crops b) EQMS chapter B14 – Manuring c) ARM Section 8 – Manuring</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Plant Nutrition and Protection Unit (PNU) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation.</p> <p>As per company SOP, the soil sampling analysis carried at 5 years interval.</p> <p>The leaf analysis and soil analysis report was made available for review.</p>	Complied

		<p>Chersonese Estate Latest Soil sampling was conducted on 21/06/2019. Refer test report no. S58/2019 dated 31/07/2019. Latest leaf sampling was conducted on 18/05/2021 – 25/06/2021. The leaf nutrient report was included in the Chersonese Estate 2022 Agronomic & Fertiliser Recommendation Report – Oil Palm dated 28/10 /2021.</p> <p>Tali Ayer Estate Latest Soil sampling was conducted on 19/11/2018. Refer test report no. S1/2019 dated 02/01/2019. Latest leaf sampling was conducted on 12/08/2021 – 30/09/2021. The leaf nutrient report was included in the Chersonese Estate 2022 Agronomic & Fertiliser Recommendation Report – Oil Palm dated 24/02/2022.</p> <p>Holyrood Estate Latest Soil sampling was conducted on 24/04/2018. Refer test report no. S35/2018 dated 11/06/2018. Latest foliar sampling was conducted on 14/06/2022. Refer test report no. P305/2022 dated 08/07/2022.</p> <p>Kalumpong Estate Latest Soil sampling was conducted on 03/09/2018. Refer test report no. S70/2018 dated 25/09/2018. Latest leaf sampling was conducted on 25/05/2022 – 30/06/2022 as per communication email dated 17/05/2022. The leaf nutrient</p>	
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		report will be included in the Agronomic & Fertiliser Recommendation Report – Oil Palm.																																				
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. The strategy as follows:</p> <ol style="list-style-type: none"> 1. EFB applied at selected fields at the estates. 2. Fibre and POM were use as compost material. 3. Palm residues after planting were left in the biomass row to decompose <p>Reviewed the records of EFB disposal as nutrient cycle as todated June 2022 as follows:</p> <table border="1"> <thead> <tr> <th>FY 2022</th> <th>Chersonese Estate</th> <th>Tali Ayer Estate</th> <th>Holyrood Estate</th> <th>Kalumpong Estate</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>404.50</td> <td>621.90</td> <td>0.00</td> <td>431.20</td> </tr> <tr> <td>February</td> <td>731.26</td> <td>1025.67</td> <td>0.00</td> <td>467.12</td> </tr> <tr> <td>March</td> <td>322.36</td> <td>844.65</td> <td>0.00</td> <td>991.49</td> </tr> <tr> <td>April</td> <td>310.40</td> <td>949.52</td> <td>0.00</td> <td>1573.50</td> </tr> <tr> <td>May</td> <td>679.89</td> <td>749.67</td> <td>0.00</td> <td>1075.66</td> </tr> <tr> <td>June</td> <td>1648.38</td> <td>467.17</td> <td>0.00</td> <td>2336.42</td> </tr> </tbody> </table>	FY 2022	Chersonese Estate	Tali Ayer Estate	Holyrood Estate	Kalumpong Estate	January	404.50	621.90	0.00	431.20	February	731.26	1025.67	0.00	467.12	March	322.36	844.65	0.00	991.49	April	310.40	949.52	0.00	1573.50	May	679.89	749.67	0.00	1075.66	June	1648.38	467.17	0.00	2336.42	Complied
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7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. Monitoring was conducted by heads of Performance Monitoring Unit. Reviewed the records of fertiliser application in Chersonese Estate, Holyrood Estate, Kalumpong Estate and Tali Ayer Estate as todated July 2022.</p>	Complied																																			

Criterion 7.5: Practices minimise and control erosion and degradation of soils.												
<p>7.5.1</p>	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Soil series map were available for all estates prepared by the R&D-Precision Agriculture Unit. No fragile soils identified in all estates in SOU 2. Soil Identified as follows:</p> <table border="1" data-bbox="1137 523 1926 1034"> <thead> <tr> <th>Estate</th> <th>Soil Series</th> </tr> </thead> <tbody> <tr> <td>Chersonese Estate</td> <td>Sabrang (40.17%), Briah (22.83%), Perepat (15.64%), Sedu (14.51%), Parit Botak (3.47%), Jawa (1.76%), Serkat (1.62%)</td> </tr> <tr> <td>Tali Ayer Estate</td> <td>Sedu (39.98%), Jawa (27.80%), Selangor (23.52%), Briah (6.36%), Unclassified (1.40%), Organic Clay (0.95%)</td> </tr> <tr> <td>Holyrood Estate</td> <td>Rasau (42.06%), Holyrood (16.61%), Unclassified (15.82%), Telemong (14.33%), Sungei Buloh (11.18%)</td> </tr> <tr> <td>Kalumpong Estate</td> <td>Jawa (32.34%), Selangor (32.06%), Briah (15.28%), Kranji (12.94%), Tebok (5.97%), Sedu (1.40%)</td> </tr> </tbody> </table> <p>Complied</p>	Estate	Soil Series	Chersonese Estate	Sabrang (40.17%), Briah (22.83%), Perepat (15.64%), Sedu (14.51%), Parit Botak (3.47%), Jawa (1.76%), Serkat (1.62%)	Tali Ayer Estate	Sedu (39.98%), Jawa (27.80%), Selangor (23.52%), Briah (6.36%), Unclassified (1.40%), Organic Clay (0.95%)	Holyrood Estate	Rasau (42.06%), Holyrood (16.61%), Unclassified (15.82%), Telemong (14.33%), Sungei Buloh (11.18%)	Kalumpong Estate	Jawa (32.34%), Selangor (32.06%), Briah (15.28%), Kranji (12.94%), Tebok (5.97%), Sedu (1.40%)
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<p>7.5.2</p>	<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>Sime Darby has established Slope and River Protection Policy signed by the Managing Director dated 15/1/2015. In the policy clearly stated that:</p> <ol style="list-style-type: none"> 1. Slope of >25° must be excluded from any new planting development and replanting program. 2. Slope of <25°, the existing crop and vegetation shall be maintained accordingly. 3. Planting terraces had been constructed where slope >10°. <p>Complied</p>										

		Fields are established with cover crops such as mucuna and soft grasses and ferns. As per slope map prepared by R&D-TTAS Precision Agriculture Unit (UCP) dated November 2018, no area with slope of >25° identified in the estate.	
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting conducted at all estates visited.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil series and topography map available for estate visited. No fragile soil categorized in the estates visited as per soil map issued by R&D Precision Agriculture Unit. As sighted in estates visited, the estate have taken into account the land terrain, drainage and road systems in planning the 2021 replanting.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest: "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through: vii. No new development of peat areas, regardless of depth or location. We will seek to rehabilitate existing plantings on peats where possible.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	As per slope map prepared by R&D-TTAS Precision Agriculture Unit (UCP) dated November 2018, topography information at estates visited as follows:	Complied

		Elevation	Chersonese Estate	Tali Ayer Estate	Holyrood Estate	Kalumpong Estate	
		0° - 2°	100.00	100.00	27.09	100.00	
		2° - 6°	0.00	0.00	28.37	0.00	
		6° - 12°	0.00	0.00	4.93	0.00	
		12° - 20°	0.00	0.00	0.25	0.00	
		20° - 25°	0.00	0.00	0.00	0.00	
		> 25°	0.00	0.00	0.00	0.00	
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.							
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at all the sampled estates.					Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: 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). - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil at all the sampled estates.					Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at all the sampled estates.					Not Applicable

7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all the sampled estates.</p>	<p>Not Applicable</p>
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. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all the sampled estates.</p>	<p>Not Applicable</p>
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. - Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all the sampled estates.</p>	<p>Not Applicable</p>
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>There is no peat soil or soil categorized as marginal or fragile soil at all the sampled estates.</p>	<p>Not Applicable</p>

	- Critical (Major) compliance -														
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>Water management plan is in place and documented. The plan has included the availability of water sources and to avoid negative impacts on other users in the catchment. No restriction of access to clean water or contribute to pollution of water used by communities.</p> <p>All the estates and mill had their sources of clean water from the public domain i.e. Perak Water Board for household consumption. The water supply is 24 hours per day.</p>	Complied												
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Water courses and wetlands are protected as per documented Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table border="1" data-bbox="1137 900 1926 1198"> <thead> <tr> <th>River width (m)</th> <th>Buffer zone width</th> </tr> </thead> <tbody> <tr> <td>> 40</td> <td>50</td> </tr> <tr> <td>20 to 40</td> <td>40</td> </tr> <tr> <td>10 to 20</td> <td>20</td> </tr> <tr> <td>5 to 10</td> <td>10</td> </tr> <tr> <td>< 5</td> <td>5</td> </tr> </tbody> </table> <p>Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/ rivers, version 1, year 2008, issue no. 1, dated 1/11/2008.</p>	River width (m)	Buffer zone width	> 40	50	20 to 40	40	10 to 20	20	5 to 10	10	< 5	5	Complied
River width (m)	Buffer zone width														
> 40	50														
20 to 40	40														
10 to 20	20														
5 to 10	10														
< 5	5														

		Based on verification at all the sampled estates, the riparian zones were satisfactorily maintained, and no evidence of agrochemicals application seen.	
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	The mill applies the biological system with series of ponds for its treatment of effluent. The mill is disposing its effluent to the land application. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Last 12 months results were verified and found that the mill complied to the BOD regulated limit i.e., 100 mg/L.	Complied
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	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. Based on the records, the mill has been using 1.21 m ³ /mt FFB per month in 2021 and 1.11 m ³ /mt FFB per month in 2022 as at June. 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 etc.	Complied
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 -	At the estates, the plan to optimise the usage of diesel is by regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. At the mill, the utilisation of fibre and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.	Complied
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			

7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The main sources of GHG emission identified were methane emission through mill effluent treatment and boiler stack from the mill. Other significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4.</p> <p>Based on verification of various records such as store issuance records and SAP system, all the data was found to be accurate.</p>	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>	Not applicable since no new development by the certification unit.	Not Applicable
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Current monitoring of dark smoke emission is by using the Continuous Emission Monitoring System (CEMS) which is linked to the Department of Environment.</p>	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>Guided by SDPB ARM, preparation of replanting using fire is not allowed. Based on site visit at replanting fields of the sampled estates, there was no trace of burning observed. Palm trunks were chipped and windrowed.</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>- Minor compliance -</p>	<p>Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire detected, inform estate.</p> <p>Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data. The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The above-mentioned fire prevention and control measures were communicated to the stakeholders through stakeholder consultation. The plan was attached to the minutes of meeting and distributed to the attendees.</p>	Complied
<p>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.</p>			
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>There is no land clearing after November 2005. Nonetheless, Information of High Conservation Value (HCV) available in the HCV Re-Assessment Final Report; Version 2.0; September 2016 for Strategic Operating Unit (SOU) 2 Chersonese. The HCV assessment was conducted by personnel from PSQM Department of Sime Darby Plantation Sdn. Bhd. reported a total of 83.39 ha HCV area within SOU 2. The info available in this latest assessment report complements the info from Biodiversity Baseline Assessment Report dated back in February 2009.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p>	<p>Based on the report mentioned in 7.12.1, The Methodology and participatory used in the assessment process comprise of the following steps:</p> <ul style="list-style-type: none"> - Team formation and briefing on project scope 	Complied

	<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>	<ul style="list-style-type: none"> - Compilation of secondary and available primary data, including preliminary Stakeholders consultation - Fieldwork and primary data collection – physical inspection, site observation, Internal and External stakeholder consultation - Data analysis and interpretation - Preparation of full report and maps - Critical review of draft report between team members - Revise report and finalize (final) <p>The assessment team has proposed recommendations that incorporated basic conservation planning principles for consideration into management administration to manage the HCV and conservation areas. The proposed management and monitoring for HCV possible threats in SOU 2 were then adopted by the respective estates.</p>	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>There was no HCVs, HCS forests identified after 15 November 2018. Nonetheless, the sampled estates have conducted their HCV monitoring through utilisation of "Monitoring of Biodiversity and HCV Areas" which were done weekly. Latest reports of checking on wildlife sighting, signage condition, sign of encroachment, rubbish/pollution and erosion were made available for verification.</p>	Complied
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated</p>	<p>Based on the report mentioned in Indicator 7.12.2, there was no area where rights of local communities have been identified in HCV areas. Nonetheless, employees were educated about this through</p>	Complied

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	<p>agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>various methods such as morning muster briefing and HCV awareness training.</p>	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Based on the report mentioned in Indicator 7.12.2, There are no significant concentrations of HCV 1 species (RTE or endemic), or which contains habitat critical to the survival of these species in the area of interest. Nonetheless, employees were educated through morning briefing/training and signage about the restriction of hunting wildlife. Training records were made available for verification at all the sampled estates.</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The sampled estates have conducted their HCV monitoring through utilisation of "Monitoring of Biodiversity and HCV Areas" which were done weekly. Latest reports of checking on wildlife sighting, signage condition, sign of encroachment, rubbish/pollution and erosion were made available for verification.</p>	Complied
7.12.8	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>There is no land clearing after November 2005 in all sampled estates.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **Chersonese POM** and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2021** for **Chersonese Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.35
PK	1.35

Extraction	%
OER	20.66
KER	5.47

Production	t/yr
FFB Process	165,781.94
CPO Produced	34252.73
PK Produced	9072.26

Land Use	Ha
OP Planted Area	9831.10
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	9831.10

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	97098.12	0.59	0.00	0.00	0.00	0.00	97098.12	0.59
CO ₂ Emission from fertilizer	11646.82	0.07	0.00	0.00	0.00	0.00	11646.82	0.07
NO ₂ Emission (peat)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO ₂ Emission (fertiliser)	6027.87	0.04	0.00	0.00	0.00	0.00	6027.87	0.04
Fuel Consumption	1566.31	0.01	0.00	0.00	0.00	0.00	1566.31	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-91404.11	-0.56	0.00	0.00	0.00	0.00	-91404.11	-0.56
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Total	24935.02	0.15	0.00	0.00	0.00	0.00	25134.66	0.15
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*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	32496.07	0.20
Fuel Consumption	76.74	0.00
Grid Electricity Utilization	785.46	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	33358.27	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

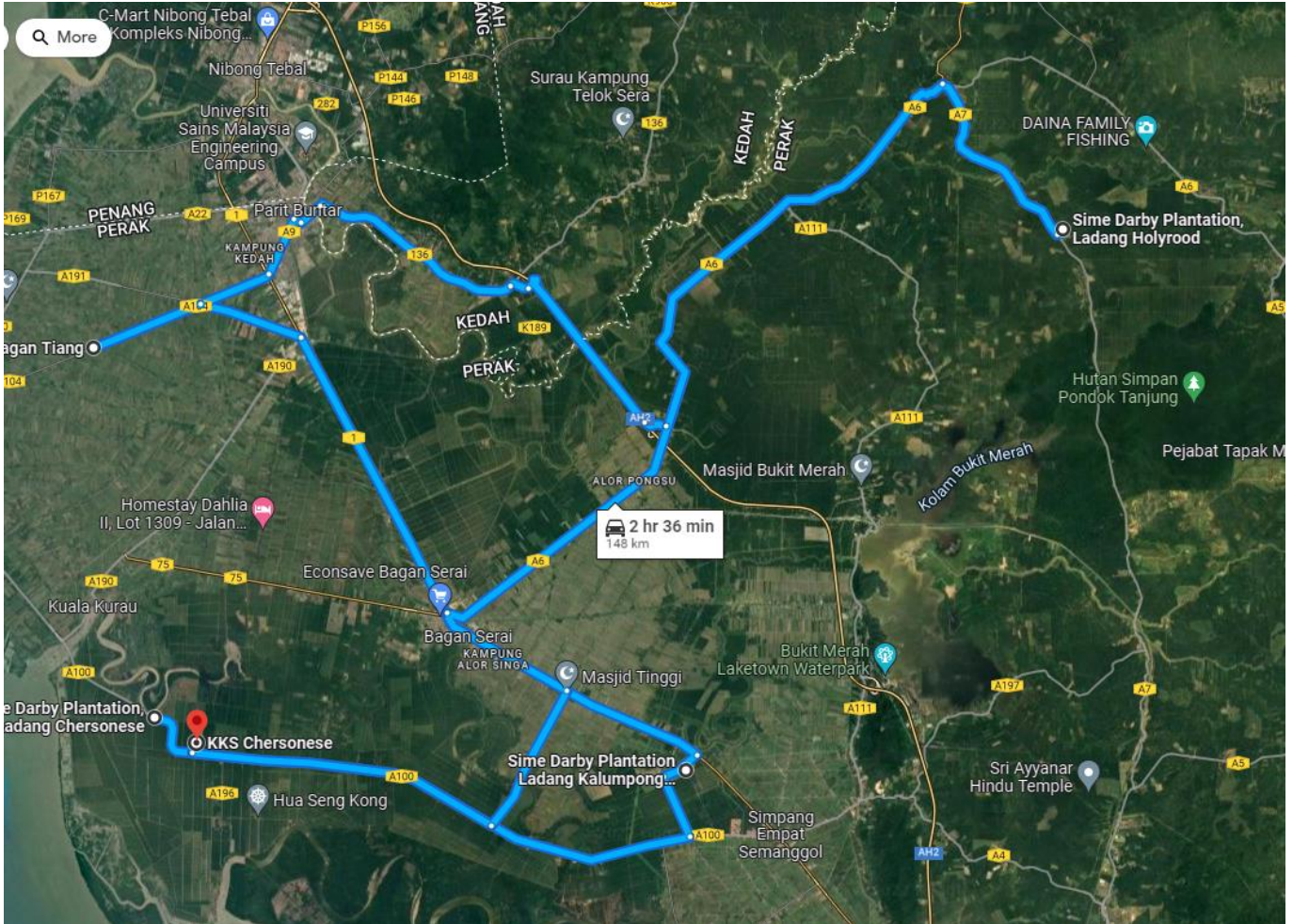
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*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) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

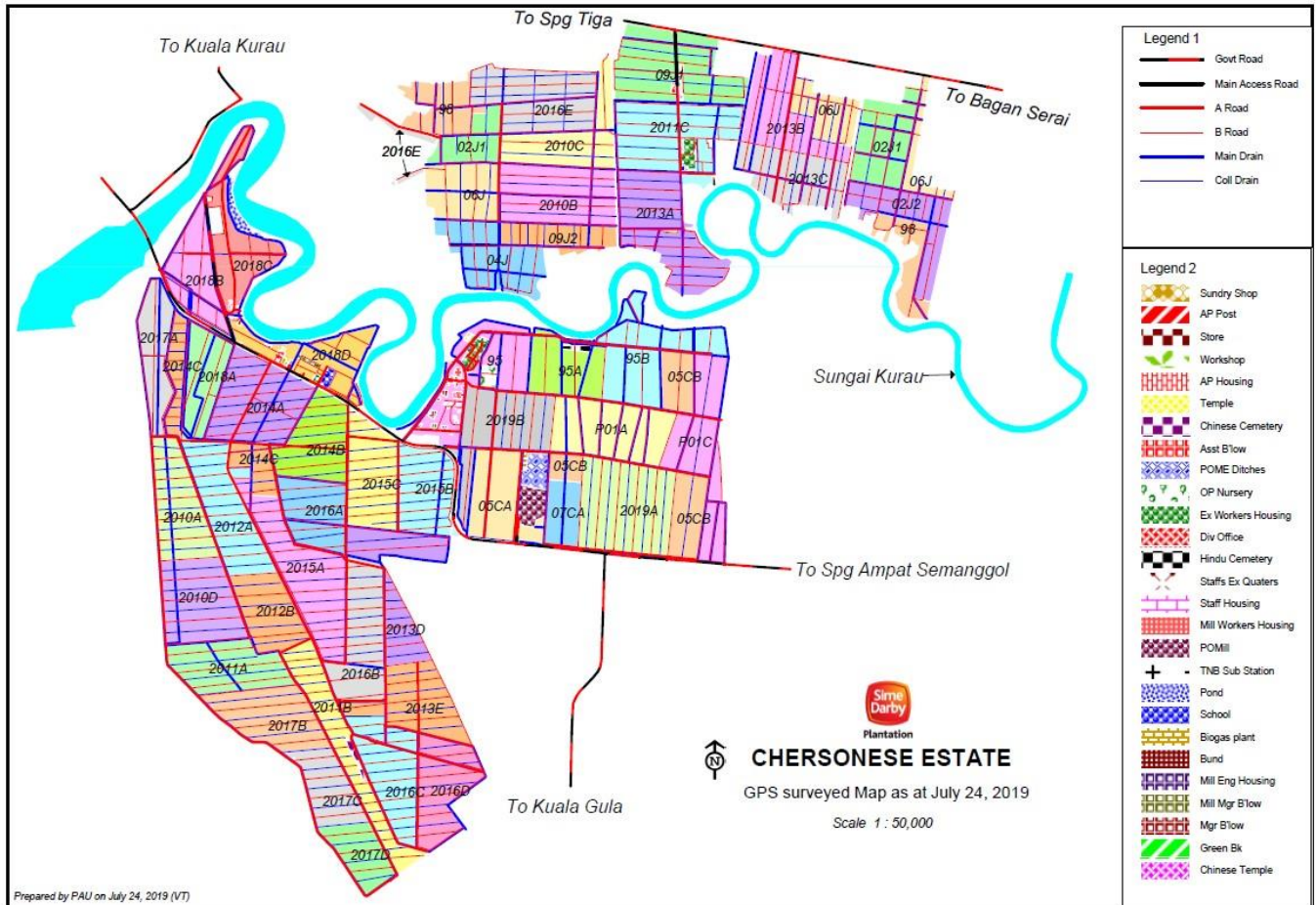
Appendix C: Location Map of Certification Unit and Supply bases



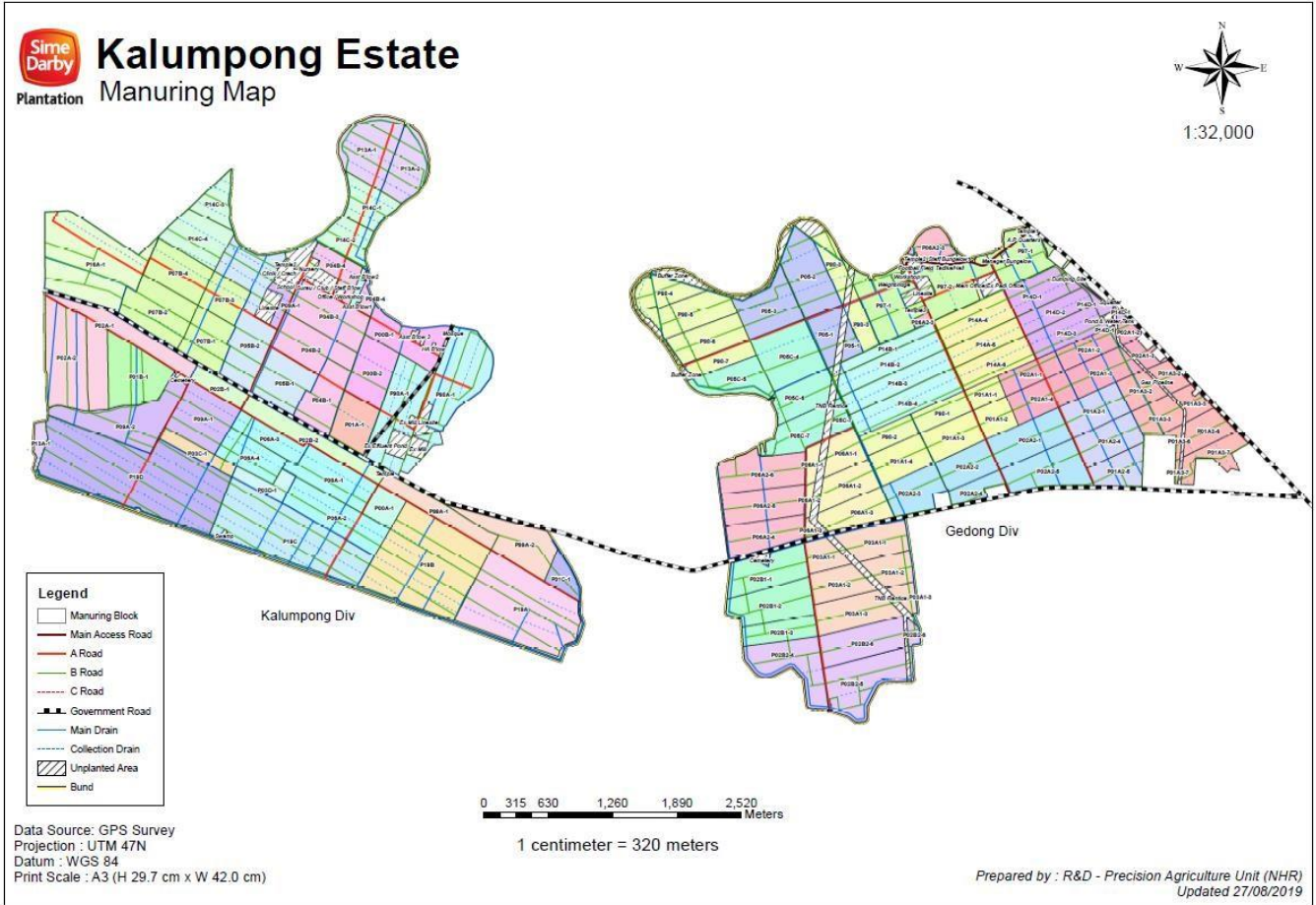
Credit: Google Maps

Appendix D: Estate Field Map

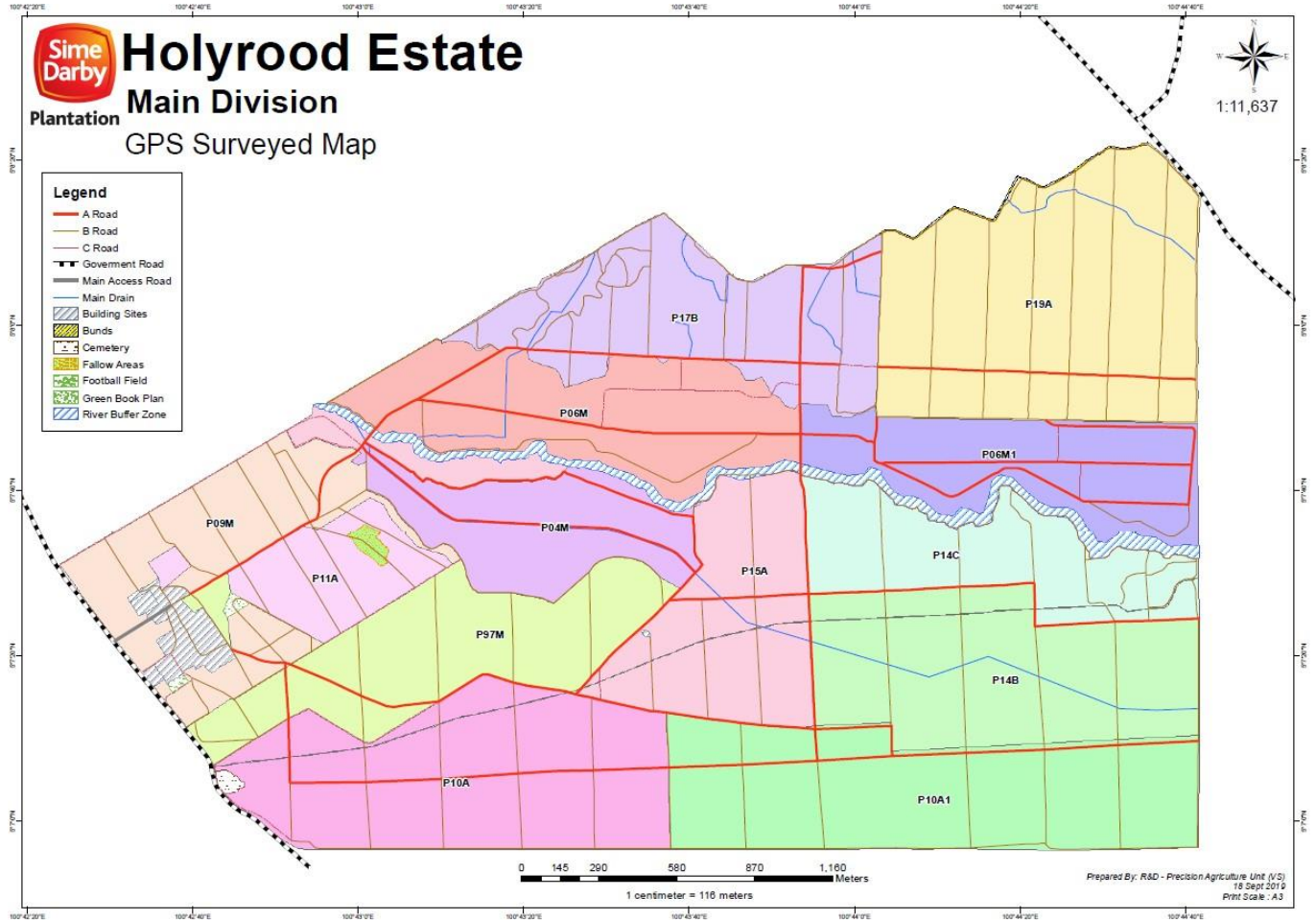
Chersonese Estate

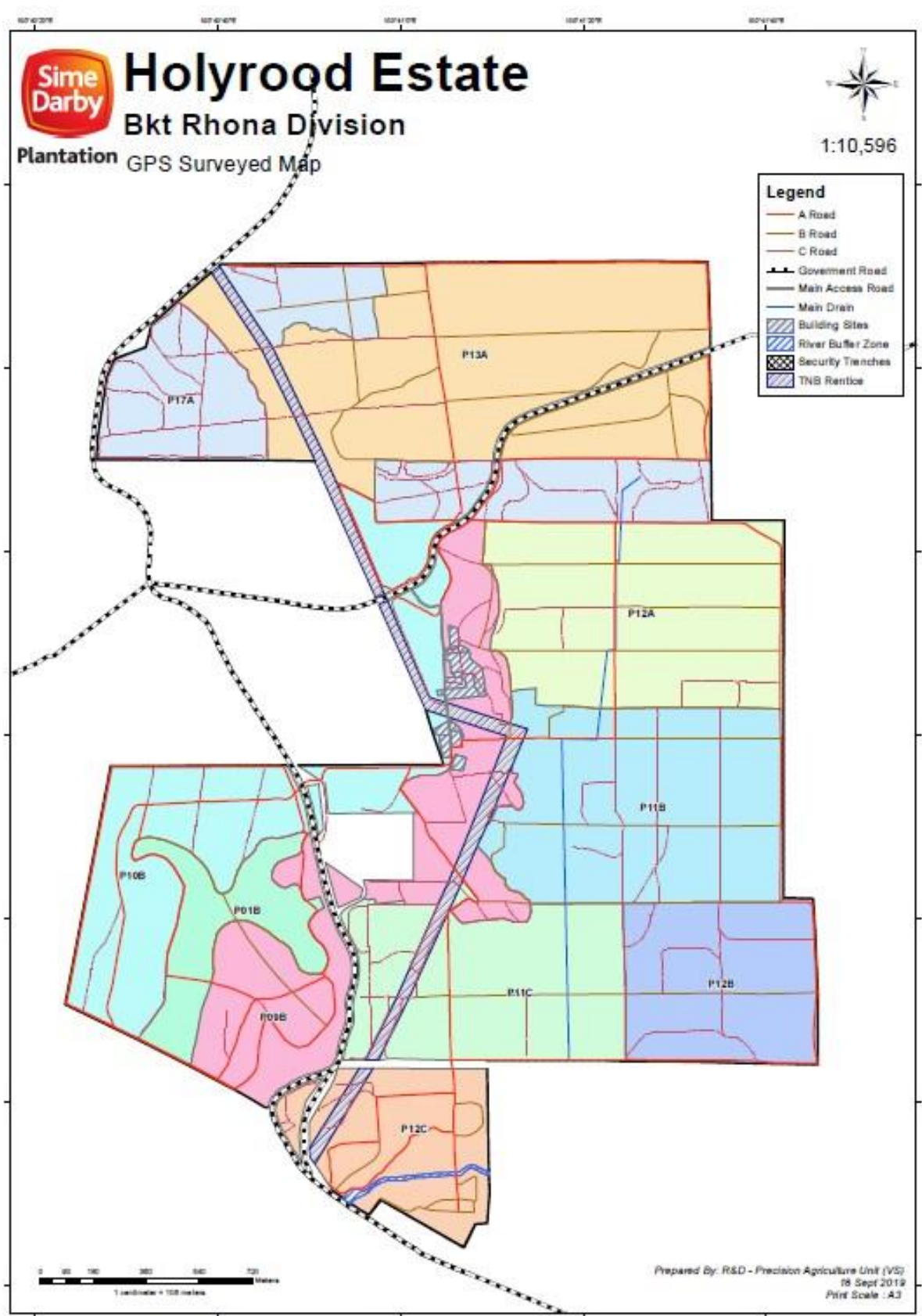


Kalumpung Estate

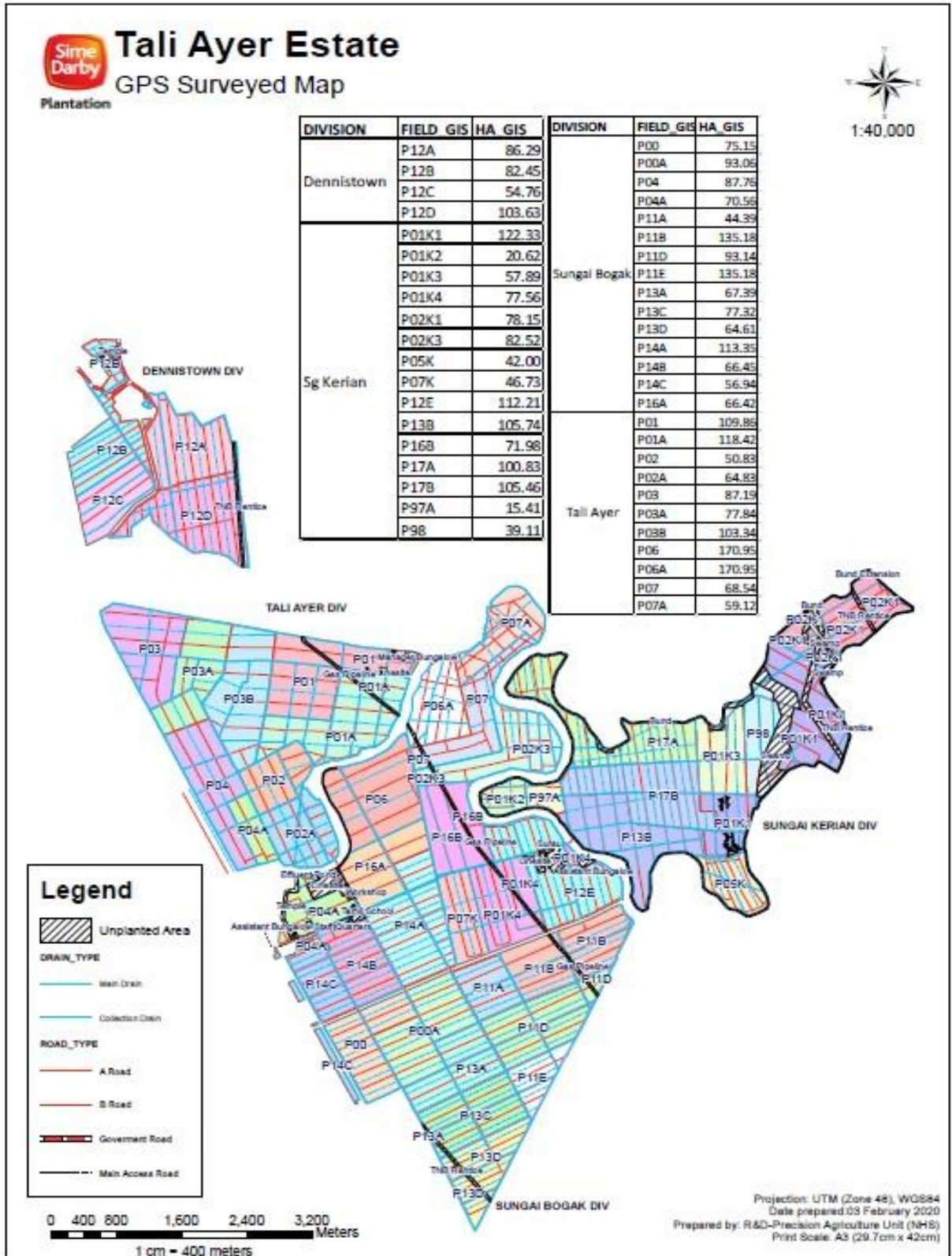


Holyhood Estate





Tali Ayer Estate



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Appendix E: List of Smallholder Registered and/or sampled

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

Note: * are smallholders sampled in this audit.

Appendix F: List of Abbreviations

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