

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (Choose an item.)
- Recertification Assessment (RA 2)
- Extension of Scope

Client Company name (Parent Company): Sime Darby Plantation Berhad
Client company Address: Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7 47301 Ara Damansara Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 4) – Flemington Palm Oil Mill
Location of Certification Unit: Lot 5138, Jalan Sg Dulang, Sungai Sumun, 36309 Teluk Intan, Perak, Malaysia
Date of Final Report: 6 February 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 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 4) – Flemington Palm Oil Mill		
Location / Address	Lot 5138, Jalan Sg Dulang, Sungai Sumun, 36309 Teluk Intan, Perak, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Abd Ghafar Bin Sulaiman (SOU 4 Representative)	E-mail	shylaja.vasudevan@simedarbyplantation.com kks.flemington@simedarbyplantation.com
Telephone	+(603) 78484379 +(605)-6489198 (Mill)	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 590802	Certificate Start Date	05/10/2021
Date of First Certification	5/10/2011	Certificate Expiry Date	04/10/2026
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	The objective of the assessment was to conduct a recertification assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system. Continuation 70% of recertification from partial assessment (30%).		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil		

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	<input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60 mt/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 682042	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	8/2/2023
MSPO 690017	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services Malaysia Sdn Bhd	8/2/2023
MSPO 714138	MSPO Supply Chain Certification: 2018	BSI Services Malaysia Sdn Bhd	17/9/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Flemington POM	Lot 5138, Jalan Sg Dulang, Sungai Sumun, 36309, Teluk Intan, Perak	3° 55' 40.71" N	101° 51' 26.60" E
Sungai Samak Estate	Lot 4672, Ulu Bernam, 36500 Perak	3° 44' 57.76" N	101° 8' 51.93" E
Sabak Bernam Estate	Lot 2094, Jalan Haji Suhaimi, 45307 Sabak Bernam, Selangor	3° 45' 33.77" N	101° 0' 25.12" E
Bagan Datoh Estate	Lot 3710, Bagan Datuk 36100 Perak, Malaysia	3° 59' 33.72" N	101° 47' 24.66" E
Flemington Estate	Lot 4541, Jln Simpang Empat- Bagan Datuk, 36309, Teluk Intan, Perak	3° 53' 27.53" N	101° 52' 50.43" 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
Flemington Estate	1,693.81	7.38	205.65	1,906.84	88.81

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Bagan Datoh Estate	3,574.83	2.00	205.03	3,781.86	93.32
Sungai Samak Estate	2,766.43	7.81	251.50	3,025.74	91.65
Sabak Bernam Estate	2,344.36	1.24	166.19	2,511.79	93.35
Total	10,379.43	18.43	828.37	11,226.23	

*Reduce 71.12 Ha from total planted due land sale to third party effective on June 2021. Increase 27.99 Ha at Infrastructure & other followed latest GPS survey conducted January 2021

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Flemington Estate	400.35	875.11	418.35	0	0	1,293.46	400.35
Bagan Datoh	975.87	2,096.25	198.75	303.96	0	2,598.96	975.87
Sungai Samak Estate	0	925.21	1,841.22	0	0	2,766.43	0
Sabak Bernam Estate	1,166.43	1,121.72	56.21	0	0	1,491.86	852.50
Total (ha)	2,542.65	5,018.29	2,514.53	303.96	0	8,150.71	2,228.72

Note:

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Oct 20 – Sept 21)	Actual (July 20 – June 21)		Forecast (Oct 21 – Sep 22)
		Previous license period (July 20 – Sept 20)	Current license period (Oct 20 – June 21)	
Flemington	29,350.00	5,408.83	20,004.77	37,941.00
Bagan Datoh	78,651.58	8,053.26	35,229.35	77,405.00
Sungai Samak	84,592.87	15,162.63	45,777.79	68,488.71
Sabak Bernam	29,728.31	4,373.60	17,600.70	51,000.00
Total	222,322.76	151,610.93		234,834.71

Note:

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Oct 20 – Sept 21)	Actual (July 20 – June 21)		Forecast (Oct 21 – Sep 22)
		Previous license period	Current license period	

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	(July 20 – Sept 20)	(Oct 20 – June 21)
Seri Intan	0	291.11
Sabrang	182.48	726.67
Sg Wangi	7,918.74	1,997.49
Sogomana	550.98	1,149.78
Total	12,817.25	

Note:

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

Out growers / smallholders	Tonnage / year			
	Estimated last year (Oct 20 – Sept 21)	Actual (July 20 – June 21)		Forecast (Oct 21 – Sep 22)
		Previous license period (July 20 – Sept 20)	Current license period (Oct 20 – June 21)	
3 rd party FFB suppliers	N/A	11,019.92	11,618.04	N/A
Total		22,637.96		

Note: Mill already convert to IP and stop receiving OCP crop start 24/7/2021

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 2020	12,721.360	3,862.180	16,583.540
2	Aug 2020	14,500.020	3,598.017	18,098.037
3	Sept 2020	14,429.140	3,559.723	17,988.863
4	Oct 2020	12,855.280	3,018.880	15,874.160
5	Nov 2020	10,173.180	2,263.340	12,436.520
6	Dec 2020	9,549.090	2,766.067	12,315.157
7	Jan 2021	10,155.480	1,612.987	11,768.467
8	Feb 2021	14,625.570	372.790	14,998.360
9	Mar 2021	17,206.500	446.342	17,652.842
10	Apr 2021	17,291.670	429.171	17,720.841
11	May 2021	15,929.870	370.137	16,300.010
12	June 2021	14,991.02	338.330	15,329.350
TOTAL		164,428.18	22,637.96	187,066.14

Note:

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10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Oct 20 – Sep 21)	Actual (July 20 – June 21)		Forecast (Oct 21 – Sep 22)
	Previous license period (July 20 – Sept 20)	Current license period (Oct 20 – June 21)	
FFB	FFB		FFB
222,322.76	41,650.52	122,777.66	234,834.71
CPO (OER: 20.95 %)	CPO (OER: 20.34 %)		CPO (OER: 21.15 %)
46,576.62	8,696.02	25,015.59	49,667.55
PK (KER: 5.47 %)	PK (KER: 4.74 %)		PK (KER: 4.75 %)
12,161.05	2,199.61	5,699.26	11,154.65
Note:			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	July 2020	3,328.51	823.966
2	Aug 2020	2,673.80	689.597
3	Sept 2020	2,693.71	686.045
4	Oct 2020	2,303.41	573.378
5	Nov 2020	2,446.65	564.915
6	Dec 2020	2,404.65	528.702
7	Jan 2021	2,221.22	598.560
8	Feb 2021	2,495.38	637.734
9	Mar 2021	3,395.33	718.932
10	Apr 2021	3,160.80	738.392
11	May 2021	3,261.61	681.659
12	June 2021	3,326.54	656.993
TOTAL		33,711.61	7,898.87
Note:			

11. Summary of Actual Volume sold					
Current License period (Oct 20 – June 21)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		

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CPO (MT)	10,079.55	0	0	13,227.80	23,307.35
PK (MT)	2,907.08	0	0	1,744.84	4,651.92
Credits	0	0	0	0	0
Previous License period (July 20 – Sept 20)					
CPO (MT)	1,062.22	0	0	7,600	8,662.22
PK (MT)	669.92	0	0	1,500	2,169.92
Credits	0	0	0	0	0
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	A	PNR/2011/CPO0721	11,141.77	-
2	B	PNK/2008/PK0057	-	3,577
TOTAL			11,141.77	3,577
Note:				

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	Nil			
TOTAL				
Note:				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	A	20,827.80	-	
2	B	-	3,244.84	
TOTAL		20,827.80	3,244.84	
Note:				

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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 (mt)
	Nil		
TOTAL			
Note:			

12. Independent Smallholders Certified Tonnage / Volume – not applicable									
Phase	Estimated last year <i>(key in period)</i>			Actual <i>(key in period)</i>			Forecast <i>(key in period)</i>		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									

13. Independent Smallholders Actual Sold Tonnage / Volume – not applicable						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (key in period)						
Credits						
Physical						

Section 2: Assessment Process

Certification Body:

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

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2.1 Assessment Methodology, Programme, Site Visits

This combined remote and on-site assessment was based on scenario 2 of RSPO Contingency RSPO Audit Procedure, V1 dated 25 August 2020. The remote audit was carried out on 23-25/8/2021 and 18-20-22/10/21 for onsite audit. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on **22/7/2021** via BSI's global stakeholder notification invitation link;

<https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2021/08-04-rspo-public-notification-recertification-sime-darby-sou-4-flemington-pom--supply-base-english.pdf>

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 **3/12/2021**. 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

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of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Flemington POM	√	√	√	√	√
Flemington	√	√	√	√	√
Bagan Datoh	√	√	√	√	√
Sungai Samak	√	√	√	√	√
Sabak Bernam	√	√	√	√	√

Tentative Date of Next Visit: September 5, 2022 - September 9, 2022

Total Number of Mandays: 15 man days

2.2 BSI Assessment Team

Name	Role	Competency
Mohamed Hidhir Zainal Abidin (MH)	Team Leader	<p>Education: Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p>Work Experience: 10 years working and auditing experience in palm oil industry specifically on palm oil milling for 5 years.</p> <p>Training attended: ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO P&C and SCCS. Completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. Attended SMETA requirements training in April 2021.</p> <p>Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue.</p> <p>Language proficiency: English and Bahasa Malaysia</p>

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<p>Vijay Kanna Pakirisamy (VK)</p>	<p>Team Member</p>	<p>Education: Bachelor’s degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019</p> <p>Aspect covered in this audit: Mill & Estate Best Practices, Legal, OSH and Worker’s Consultation.</p> <p>Language proficiency: Bahasa Malaysia and English languages</p>
<p>Muhamad Naqiuddin Mazeli (MN)</p>	<p>Team Member</p>	<p>Education: Bachelor of Science Horticulture at University Putra Malaysia</p> <p>Work Experience: Started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations.</p> <p>Training attended: Completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018</p> <p>Aspect covered in this audit: Estate and mill best practice, legal and other requirements, Environmental and biodiversity, waste management and RSPO SCCS.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>
<p>Dr Suhaili Sahari</p>	<p>Peer Reviewer</p>	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato’ Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong</p>

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		<p>Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. ASI Reviewer training 3. Safety and Health 4. ISO 14001:2015 Standard 5. RSPO Standards: RSPO P&C 2018 MY-NI 2019 6. MSPO Standards : MS 2530 : 2013 part 1, 2 , 3 and 4 7. Problem Solving Technique : 8 D, ICC, QCC, Systematic PS 8. HACCP MS 1480:2019 9. GAP Standard : Global GAP, Euru GAP
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Accompanying Persons:

Name	Role
Nil	

2.3 Assessment Plan

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

Date	Time	Subjects	(MH)	(MN)	ICT Planned
Monday, 16/08/2021	1100 – 1130	Proposed preparatory/test call between client and BSI auditor. Communication on document preparation for remote/ICT audit.	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
Monday, 23/08/2021 Flemington 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 	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
	0930 – 1230	RSPO SCCS reclassification of module. MB to IP module.	-	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email

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Date	Time	Subjects	(MH)	(MN)	ICT Planned
	1300 – 1400	Lunch break	√	√	
	1400 – 1630	Assessment and documentation review on: • RSPO SCCS components and RSPO Rules on Market Communication and Claim	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
		Assessment and documentation review on: • Good milling practice, legal requirements, environment and waste management • Legal requirements, OHS and continual improvement	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
		Assessment and documentation review on: • Social aspects, legal requirements, employees’ welfare and stakeholder management	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
1630 – 1700	Interim closing – daily wrap-up	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email	
Tuesday, 24/08/2021 Bagan Datoh and Flemington Estate	0900 – 1300	Assessment and documentation review on: • Good agriculture practice, legal requirements, environment and HCV • Legal requirements, OHS and continual improvement	-	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
		Assessment and documentation review on: • Social aspects, legal requirements, employees’ welfare and stakeholder management	√	-	MS team, WhatsApp, Teleconference, Telecon, Face-time, email
	1300 – 1400	Lunch break	√	√	
	1400 – 1630	Continue with unfinished elements	√	√	MS team, WhatsApp, Teleconference, Telecon, Face-time, email
	1630 – 1700	Interim closing – daily wrap-up	√	√	MS team, WhatsApp, Teleconference, Telecon, Face-time, email
Wednesday, 25/08/2021	0900 – 1300	Assessment and documentation review on: • Good agriculture practice, legal requirements, environment and HCV • Legal requirements, OHS and continual improvement	-	√	MS team, WhatsApp, Teleconference, Telecon, Face-time, email

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Date	Time	Subjects	(MH)	(MN)	ICT Planned
Sungai Samak and Sabak Bernam Estate		Assessment and documentation review on: <ul style="list-style-type: none"> Social aspects, legal requirements, employees' welfare and stakeholder management 	√	-	MS team, WhatsApp, Teleconference, Telecon, Face-time, email
	1300 – 1400	Lunch break	√	√	
	1400 – 1630	Continue with unfinished elements	√	√	MS team, WhatsApp, Teleconference, Telecon, Face-time, email
	1630 – 1700	Closing meeting – presentation of finding	√	√	MS team, WhatsApp, Teleconference, Telecon, Face-time, email

Date	Time	Subjects	MH	VK	MN
Sunday 17/10/2021	PM	Audit team travel to Teluk Intan. Check in at Grand Court Hotel	√	√	√
Monday 18/10/2021	0730	Audit team travel to Flemington POM	√	√	√
Flemington POM/ Flemington Estate	0830 - 0900	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). Verification on previous audit findings 			
	0830 - 1200	Flemington POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc	√	√	√
	1200 - 1300	Lunch	√	√	√
	1300 - 1630	Flemington Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). 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.	√	√	√
	1630 -	Interim Closing Briefing	√	√	√

	1700				
Tuesday 19/10/2021	AM -PM	Prophet Muhammad Birthday (Public Holiday)			
Wednesday 20/10/2021	0730 0900 - 1200	Audit team travel to Sg Samak Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc. 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).	√	√	√
Sg Samak /Sabak Bernam Estate	1000 - 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1300 - 1400	Lunch break	√	√	√
	1300 1400	Audit team travel to Sabak Bernam Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc. 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 21/10/2021	0730 0900 - 1200	Audit team travel to Bagan Datoh Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc. 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).	√	√	√
Bagan Datoh Estate	1000 - 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1300 - 1400	Lunch break	√	√	√
	1300 - 1630	Continue with unfinished elements/pending issues from day 1 & 2	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√

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Friday 22/10/21 Flemington POM	0730	Travel to Flemington POM	√	√	√
	0830	Continue with unfinished elements/pending issues from day 1, 2 & 3			
	0930 - 1000	Audit team discussion	√	√	√
	1000	Closing meeting	√	√	√
	1030	End of audit	√	√	√

Major NC close out verification

Date	Time	Subjects	Mohd Hidhir
Friday 3/12/2021	0730 – 0830	Audit team travel to Bagan Datoh Estate	√
	09.00 – 09.15	Opening Meeting <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Briefing on verification plan 	√
	09.15 – 10.30	Bagan Datoh Estate – Verification on previous Major NC. Site observation, workers interview (individual and group session) if necessary Document review – implemented evidence	√
	11.30 – 12.00	Closing meeting	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	<p>Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p>http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p>	Complied.

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<p>Have all the estates and mills certified within five (5) years after obtaining RSPO membership?</p>	<p>Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. 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, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.</p>	<p>Complied</p>
<p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.</p>	<p>No. There is no new acquisitions as at latest TBP 2021.</p>	<p>Complied</p>
<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<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>	<p>Complied</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Yes.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties 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. 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</p>	<p>Complied</p>

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	<p>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. ACOP 2020 has been cross-referenced as below: www.rspo.org/members/29</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 implementation of the plan? If yes a Major non-compliance shall be raised</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>
<p>Un-Certified Units or Holdings</p>		
<p>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.</p>	<p>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</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<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-subsiadiary-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- 	<p>Complied</p>

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	<p>plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited</p> <p>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</p> <p>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</p> <p>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</p> <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>	
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	Management units for 11 – 13 above were disposed.	
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.	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed. 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 14/07/2021, 10 LUCAs were approved with 0 conservation liability and remaining 9 are still pending from RSPO.	Complied
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	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 between July 2020 – August 2020. 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
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 between July 2020 – August 2020. 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

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Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company	Complied
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3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>There is no scheme smallholders and/ or outgrowers include in the scope of certification.</p>	<p>Complied</p>

Approved Time Bound Plan

SDP - RSPO Certification Status for 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					

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		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	-		Certified	19/05/2011	-

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		West Estate		Carey Island, Selangor			
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	-
		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					

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		Salak Estate					
16	Kok Foh	Kok Foh Oil Mill	-	Bahau, Negeri Sembilan	Certified	07/07/2011	-
		Muar River 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	-
		Kempas Estate					
		Tangkah Estate					
		Kemuning Estate					
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	-	Jasin, Melaka	Certified	05/10/2011	-
		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	-

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		Chaah Estate					
		Sg. Simpang Kiri Estate					
		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					

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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					

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		Rasan Estate					
		Belian Estate					
		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

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							initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
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SDP- RSPO Certification Status for 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	-
		Mustika Estate						
		KKPA-2 PT.SHE Estate						
		KKPA-3 PT.SHE Estate						
		KKPA-5 PT.SHE Estate						
3	PT Ladangrumpun Suburabadi	Angsana Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	06/07/2021	-
		Angsana Estate						
		Pantai Bonati Estate						
		Gunung Sari Estate						
		KKPA-1 PT.SHE Estate						
		KKPA-4 PT.SHE Estate						
		Subur Abadi Plasma 1 Estate	2021	2020	stage 2			
4		Bebunga Mill	-	-		Certified	16/03/2012	

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	PT Langgeng Muaramakmur	Bebunga Estate			Kotabaru District – South Kalimantan			Previously KKPA Sg. Cengal. Sime Darby Plantation does not have management control over the plasma scheme.
		Sungai Cengal Estate						
		Bakau Estate						
		KKPA LMR	2021	2020				
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 (1200ha) was certified. Division 1 & 2 with 1792 Ha received HGU recently. The unit is getting ready for certification. Plan for certification in 2020. Total Ladang Panjang Estate is 2992 ha. Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR.
		Ladang Panjang Estate						
		Plasma BGR Estate	2020	2020				
7	PT Tunggul Mitra Plantations	Manggala Mill	-		Rokan Hilir District – Riau	Certified	25/11/2010	-
		Manggala 1 Estate						
		Manggala 2 Estate						
		Manggala 3 Estate						
8		Pondok Labu Mill	-			Certified	16/03/2012	-

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	PT Paripurna Swakarsa	Pondok Labu Estate Binturung Estate Rampa Estate Sesulung Estate			Kotabaru District – South Kalimantan			
9	PT Bersama Sejahtera Sakti	Gunung Aru Mill Gunung Aru Estate Gunung Kemasan Estate Laut Timur Estate Pantai Timur Estate KKPA MBP	- 2021	 2020	Kotabaru District – South Kalimantan	Certified	05/07/2011	- Currently in nursery stage and not yet due for harvesting, the year of planting was in 2014. Internal Audit for 2019 is planned in Dec 2019.
10	PT Guthrie Pecconina	Rantau Panjang Mill Rantau Panjang Estate Bumi Ayu Estate Karang Ringin Estate Napal Estate Mangun Jaya Estate Sungai Jernih Estate and GPI KKPA Estate	- 2020	 2020	Musi Banyuasin District – South Sumatera	Certified	16/03/2012	Remarks: Land legalisation process for 4152.70 ha is still in process. Sungai Jernih Estate and the KKPA Estates(1-5) has undergone audit. Land legalisation process is still in process.
11	PT Laguna Mandiri	Rantau Mill Rantau Estate Matalok Estate Betung Mill	-		Kotabaru District – South Kalimantan	Certified	30/12/2011 01/04/2014	

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		Betung Estate						
		Sekayu Estate						
12	PT Indotruba Tengah	Sekunyir Mill	-		Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23/11/2010	-
		Sekunyir						
		Seruyan Estate						
13	PT Swadaya Andika	Selabak Mill	-		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.
		Selabak Estate						
		Randi Estate						
		Sangkoh Estate						
		Lanting Estate						
14	PT Bina Sains Cemerlang	Sungai Pinang Mill	-		Musi Rawas District – South Sumatera	Certified	11/09/2012	Remarks: Land legalisation process for 308.35 ha is still in process.
		Sungai Pinang Estate						
		Bukit Pinang Estate						
15	PT Teguh Sempurna	Pemantang Mill	-		Seruyan and East Kotawaringin District – Central Kalimantan	Certified	05/07/2011	-
		Pemantang Estate						
		Kawan Batu Estate						
		Hatan Tiring Estate						
		Batang Garing Estate						
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill	-		Indra Giri Hilir District – Riau	Certified	11/10/2011	-
		Teluk Bakau Estate						
		Nusa Lestari Estate						
		Nusa Perkasa Estate						
		Mandah Mill					01/04/2014	
		Mandah Estate						

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		Rotan Semelur Estate						
17	PT Intipersada Aneka	Teluk Siak Mill	-		Pekanbaru, Siak District – Riau	Certified	11/10/2011	-
		Teluk Siak Estate						
		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	2021	2020	-		Usage Approval (<i>Perijinan</i>) process is ongoing	
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	2021	2020		-		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 – Nanggroe 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						

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		Awatan Estate						
		Karya Palma Estate	2021	2020		-		Usage Approval (<i>Perijinan</i>) process is ongoing
		KKPA SNP Estate	2021	2020				Usage Approval (<i>Perijinan</i>) process is ongoing
22	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-		Ketapang District – West Kalimantan	Certified	03/07/2019	-
		Sungai Putih (PT BAL) Estate	2021	2020		-		Land Approval is obtained in 2015 while the other approvals are still in processing HGU obtained as per May 2018
		Beturus (PT BAL) Estate	2021	2020		-		
		KKPA BAL Estate	2021	2020		-		
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)					
		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					
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					

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		Rigula Estate					
		Numundo Estate					
		Navarai / Karato ME /KDC EU Estate					
		Volupai / Lotomgam / Natupi / Goruru Estate					
		Lolokoru Estate					
		Ove Estate					
		Tamare Estate					
		Smallholders LSS Mosa (1822)					
		Smallholders VOP East (1817)					
		Smallholders VOP Central (1964)					
		Smallholders VOP West (1279)					
		Smallholders LSS Kapiura (551)					
		Smallholders VOP Kapiura (850)					
		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
		Munum Estate					
		Maralumi Estate					
		Erap Estate					

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 1 Critical; 1 Minor nonconformities and 1 Opportunity For Improvement raised. The *Flemington POM* 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 #	2121039-202110-M1	Date Issued	22/10/2021
Due Date	19/1/2022	Date of nonconformity Closure	15/12/2021
Clause & Category (Critical / Minor)	7.3.2 (upgraded to Major)		
Statement of Nonconformity:	Proper disposal of scheduled waste was not demonstrated according to established procedures		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<u>Bagan Datoh Estate</u> During site visit at the Main Division of the estate, used oil based paint containers, 200L Oil containers, lubricant containers, used chemical pumps and used 20L chemical container which are categorized as scheduled waste were sighted to be stored at the Scrap Yard. The waste were not stored in the designated scheduled waste store with no waste information, date of generation and not properly transferred into closed and durable containers that are able to prevent spillage or leakage onto the environment as per SDP Sustainability and Quality Management (PSQM); Scheduled Waste (Hazardous Waste) Management; SD/SDP/PSQM(ESH)/203-EN1 dated 26 Feb 2015; 6.4.1, which states OU shall ensure that all waste generated are properly transferred into closed container which are durable and able to prevent spillage or leakage of the scheduled waste onto the environment. Furthermore, interview with the sampled workers involved in generating scheduled waste, indicated that they were unaware on the procedures of schedule waste storage in the estate.		
Corrections:	The Scheduled Waste inventory updated in e-SWIS inventory record on monthly basis (as per current practice) meanwhile on-site inventory will be recorded by person in charge (store clerk) monitored by assistant manager (CePSWaM)*. The determination of SW category and its management will be discussed during ESH meeting and as per advised by CePSWAM together with Regional SQM.		
Root Cause Analysis:	Lacking in awareness on scheduled waste management specifically to the workers who involve indirectly with the scheduled waste identification of used oil-based paint container and other containers.		
Corrective Actions:	1. Estate will conduct refresher training on scheduled waste management to all related person I.e : mandore, store clerk, foreman, workshop attendant, medical		

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	<p>staff, field staff and executive. The training will be done by CePSWaM personnel. The training will be conducted on annual basis and will be added in Annual Training Program.</p> <p>2. Information on scheduled waste through pictorial will be placed at strategic area such as linesite, muster ground, dispensary, workshop and store area for better understanding to all workers and as part of communication.</p> <p>3. Estate will improve the quarterly inspection checklist at scheduled waste, workshop and linesite area as part of workplace inspection for continuous improvement. The inspection checklist will be based on Regional Sustainability Site Assessment's checklist.</p>
Assessment Conclusion:	<p>Onsite major NC close out verification:</p> <p>i) Allocation of designated scheduled waste storage area near to workshop area. Solid and liquid waste type stored separately and equipped with proper spill kit and secondary containment.</p> <p>ii) Copy of 5th schedule for November 2021 dated 30/11/21 was made available. Used container under waste code SW409 (contaminated disposed container, bag or equipment) with total of 0.018 mt generated as at 30/11/2021.</p> <p>iii) Training matrix for 2022 was verified and include specific workers that involved in scheduled waste management. Those identified personnel has to undergo the required training as per next year training plan/matrix. Latest training for 2021 was carried out on 24/11/2021 for a few groups of workers consist of mandore, foreman, store clerk, MA and other relevant staff that involved in scheduled waste management. Interview with the relevant personnel has confirmed the understanding on scheduled waste management. They are able to explain the process of waste handling from generation up to storage and disposal of waste.</p> <p>iv) Scheduled waste information was posted at the strategic area within the estate compound as part of awareness programme to all workers with regards to scheduled waste management.</p> <p>v) Workplace inspection was carried out on 3 monthly basis using Regional Sustainability Site Assessment's checklist. The latest checklist dated 1/11/21 inspected by estate assistant manager was verified. No issue related to environmental issue reported in the checklist.</p> <p>Implemented action found to be effective to close the major NC on 15/12/21. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	2096510-202108-N1	Date Issued	25/8/2021
Due Date	To be closed in the next surveillance assessment	Date of nonconformity Closure	"open"
Clause & Category (Critical / Minor)	6.7.5 (minor)		
Statement of Nonconformity:	Occupational injuries reported under JKPP 8 was not accurately recorded.		
Requirement Reference:	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.		

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Objective Evidence:	Sighted at Sabak Bernam Estate, lost time injury (7 day) recorded in JKPP 8 (JKKP8/79060/2020) dated 25/1/2021 was not tally with the Medical Certificate (AM 568694) issued for 6 days by medical practitioner.
Corrections:	Amending the file / documents based on actual record.
Root Cause Analysis:	The error due to 1st time reporting to JKPP (8) by newly recruited medical practitioner. The PIC was in charge as Medical Assistant on October 2020 and no experience with the DOSH requirement & reporting.
Corrective Actions:	Continuous training on the LTA / accident record by PIC for the medical practitioner to ensure no recurrence issue. LTI case validation exercise to be done before JKPP 8 submission.
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	6.1.5 – SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, more definitive roles, and responsibilities as well as governance structure and programmes were added in. Conformance to the new TOR requirements related to programme such as meetings, engagement programme and (non-labour related) assessment/survey has yet to further verified in the next assessment

Positive Findings	
PF #	Description
PF 1	Good cooperation given to the audit team by site and HQ team
PF 1	No negative feedback received from the internal and external stakeholders.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1930293-202007-M1	Date Issued	17/7/2020
Due Date	16/10/2020	Date of nonconformity Closure	2/10/2020
Clause & Category (Critical / Minor)	3.4.3 - Critical (Major)		
Statement of Nonconformity:	The environmental management plan was not effectively implemented		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		

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Objective Evidence:	<u>Sabak Bernam Estate</u> Sighted during site visit along the main road from P19 G to P19H, it was noted there was evidence of chemical application along the main drain edge.
Corrections:	Estate has conduct education and awareness drain edge area to the whole spraying gang. Training conducted at 14th July 2020.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Management not clearly demarcated drainage area. 2. Poor supervision by Mandore and staff during spraying at drain edge area.
Corrective Actions:	<p>Estate has marked the last palm at the drain edge with white paint to notify sprayer they are at drain edge area.</p> <p>All the sprayers will be re-trained on the sustainable spraying procedure by management or external party.</p> <p>The supervisor will have the spraying checklist & will use the checklist for morning briefing and inspection.</p>
Assessment Conclusion:	Verified at all visited estates, no recurrence of issue observed. Clear marking and demarcation was noted and no evidence of any chemical activities near to buffer zone and drain edge. Thus, the previous Major NC is remain closed.

Non-conformity			
NCR Ref #	1930293-202007-M2	Date Issued	17/7/2020
Due Date	16/10/2020	Date of nonconformity Closure	2/10/2020
Clause & Category (Critical / Minor)	6.2.3 - Critical (Major)		
Statement of Nonconformity:	Some of the labour legal compliance were not fully demonstrated.		
Requirement Reference:	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.		
Objective Evidence:	<p><u>Sungai Samak Estate:</u> Worker ID: 0000155882 (Paswan Amarjeet) and Worker ID: 0000155174 (Rusnan) didn't have employer SOCSO contribution as sighted in pay slip for March, April and May 2020.</p> <p><u>Sabak Bernam Estate:</u> Worker ID: 0000138630 (Meghbar Paswan) and Worker ID: 0000132451 (Saudi) has the sick pay and holiday pay below than the minimum wage of RM 42.31/day as below: 1. Worker id 0000132451 (Saudi): May 2020, F001-Holiday pay (RM 118.74/3 days), F002-Sick Pay RM 39.58/day). 2. Worker id 0000138630 (Meghbar Paswan): May 2020, F001-Holiday pay (RM 123.09/3 days), F002-Sick Pay RM 41.03/day).</p> <p><u>Flemington POM:</u> It was found that Lotus Two contractor workers' namely Mohammed Suruz (Passport no: BL0061393), Utam Kumar (Passport no: BT0067917) and Hossain (Passport no: BK0851510) didn't have the correct SOCSO contribution rate for</p>		

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	<p>the salary of Jan, Feb and March 2020 as per SOCSO Lampiran B. <u>Flemington Estate:</u> Worker ID: 0000150407 (Tomi Zulyandri) has holiday pay below than the minimum wage of RM 46.15/day for May 2020 which is F001-Holiday pay (RM 130.08/3 days).</p>
<p>Corrections:</p>	<p>Sungai Samak Estate Amendment of employee master done on 17/7/2020. Arrears payment done on 29/7/2020. These two workers are currently covered by SOCSO. Sabak Bernam Estate Reimbursement of remaining amount on that month which is below of minimum wage rate for holiday pay after seeking clarification & approval from HR Group. Flemington POM Lotus Two already made a reimbursement for the incorrect SOCSO contribution rate for salary Jan, Feb and March 2020 to the workers on 17/7/2020. Flemington Estate Reimbursement of remaining amount on that month which is below of minimum wage rate for holiday pay after seeking clarification & approval from HR Group.</p>
<p>Root Cause Analysis:</p>	<p><u>Sungai Samak Estate</u> SOCSO online registration for Paswan Amarjeet and Rusnan already done before but mistake was done during updating employee master where staff in-charge was wrongly chose no contribution instead of employer contribution. <u>Sabak Bernam Estate</u> The holiday pay based on previous month's OPR is calculated by system & locked by HR Group – IT. Different understanding of calculation may happen at the group level. <u>Flemington POM</u> Lotus Two contractor has made SOCSO contribution to his workers but incorrect SOCSO contribution rate. This is due to SOCSO Employment Injury (EI) scheme is new and was implemented in January 2020. Flemington Estate The issue is that our Company payslip takes the OPR and splits it into two. Below is an example of Tomi Zulyandri wages OPR - RM46.63 i) Current OPR - 43.36 ii) PI/OI Element - 3.27 The total OPR is correct (above minimum wages). Unfortunately the current OPR (RM43.36), is the amount that is carry-forwarded to the next month. So, the payment of Holiday Pay for the next month is in breach of the minimum wage rule. The holiday pay based on previous month's OPR is calculated by system & locked by HR Group – IT. Different understanding of calculation may happen at the group level.</p>
<p>Corrective Actions:</p>	<p><u>Sungai Samak Estate</u> For future batch of new workers, SOCSO online registration and employee master record will be updated simultaneously by estate management and Chief Clerk (CC)</p>

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	<p>to avoid any mistake. CC will keep the copy of transaction into their personal file for future checking.</p> <p><u>Sabak Bernam Estate</u></p> <p>To notify IT, HR and IR department to automatized minimum wages standard for sick and holiday pay.</p> <p><u>Flemington POM</u></p> <p>Mill to ensure contractor follow correct contribution rate as per SOCSO Lampiran B. The mill will check during new contract agreement or after adding new workers or worker replacement.</p> <p><u>Flemington Estate</u></p> <ol style="list-style-type: none"> 1. After seeking clarification by HR Group (considering HR already discussed with the JTK on this issue), the OPR calculation system will be amended by HR Group – IT 2. Verification of estate management on the system on the early of next month
Assessment Conclusion:	Based on salary records checked (payslips/checkroll/SOCSO - <i>jadual caruman</i>), no recurrence of issue noted. Thus, the previous Major NC is remain closed.

Non-conformity			
NCR Ref #	1930293-202007-M3	Date Issued	17/7/2020
Due Date	16/10/2020	Date of nonconformity Closure	2/10/2020
Clause & Category (Critical / Minor)	6.7.3 (critical)		
Statement of Nonconformity:	<ol style="list-style-type: none"> 1. Workers do not use the available Sanitation Facility to change out of PPE, wash and put on their personal clothing. 2. Workers use PPE which is not provided free of charge to them. 		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	<p>Occupational Safety Procedures (SOP); Procedures, Safe Work for General Workers; After Work; No. 1: Cleaning oneself after completing general work. Interview with the female sprayers in Sungei Samak Estate indicated that they do not use the sanitation facilities to change out, wash and put on clean clothing provided by the estate as the facilities were not in working order. Site visit at the washing room area established that both the provided washing room’s shower was broken.</p> <p>Interview with the sprayers (Male & Female workers) in Flemington Estate (New Coconut Div) indicated that they do not use the sanitation facility to change out, wash and put on clean clothing provided by the estate. The site visit to the washing area showed the washing area was in working condition with minor repairs required. (Tap at one of the women’s washing room was broken).</p> <p><u>Flemington Estate.</u></p>		

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	<p>Interview with the workers indicated that the Rubber Boots are provided by the management, but due to the delay to receive the rubber boots for replacement, the workers end up purchasing the rubber boots by themselves. This issue was earlier raised in the NUPW Meeting with the Management.</p>
<p>Corrections:</p>	<p><u>Sungai Samak Estate</u> Repairs work for sanitation facilities done on 17/7/2020. Rules were enforced with immediate effect to all sprayers where they must wash and store their PPE before going back to their house. Monitoring done by staff in-charge on daily basis.</p> <p><u>Flemington Estate</u> 1. The estate management has established 'Post Spraying Activity Daily Checklist' and 'Washing Room Usage Record' for the workers who involve in chemical- based operations. One of immediate action is repairing the washing & bathing facilities for workers. 2. The estate management are giving the wellington boots to the affected workers & if the boots are not suit to them, they can make a complaint immediately. The record as per PPE issuance logbook. PPE fitting will be done at the same time.</p>
<p>Root Cause Analysis:</p>	<p><u>Sungai Samak Estate</u> Lack of inspection at sanitation facility area</p> <p><u>Flemington Estate</u> Lack of awareness for the sprayers on the importance of getting self-hygiene protection after involving with chemical based operation despite been told many times by the estate management throughout morning muster call. The estate management has previously distributed PPE towards workers. Some of them claimed that PPE provided eg; wellington boots are not comfortable to be used. Due to that, they have decided to buy on their own.</p>
<p>Corrective Actions:</p>	<p><u>Sungai Samak Estate</u> Since sanitation facility room located next to worker's line site, management decided to carry out routine inspection during fortnightly line site inspection. All the issue will be attended immediately. Besides that, estate management will closely monitor the sprayers to ensure they use sanitation facilities properly as per requirement.</p> <p><u>Flemington Estate</u> Continuous monitoring by management in ensuring the workers are taking a bath & washing their PPE (such apron, glass, nitrile gloves & wellington boots) before leaving for home. After spraying works done, sprayers need to do a simple checklist and fill in the recording book provided at Division Office. This book then will be verified by field staff, assistant manager as well as the Manager. PPE training will be as a part of annual awareness training (certain will be add on in the chemical handling training) PPE fitting will be done on the annual basis or during distribution of PPE (based on request). The workers can comment or complaint in the complaint book. This initiative will be communicated to NUPW committee. Estate will establish the forecast of PPE request trend for core works such harvesting, spraying & manuring so that management can buy earlier for</p>

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	temporary stocks to avoid delaying in PPE distribution.
Assessment Conclusion:	As per verification of monitoring record for bathing facilities and PPE monitoring in Sg Samak Estate showed that implementation was according to CAP. The record of PPE was available and updated, the Major NC remained closed.

Non-conformity			
NCR Ref #	1930293-202007-N1	Date Issued	17/7/2020
Due Date	In the next surveillance assessment	Date of nonconformity Closure	Previous NC was not closed and upgraded to major NC
Clause & Category (Critical / Minor)	7.3.2 (minor)		
Statement of Nonconformity:	Proper disposal of scheduled waste was not demonstrated according to procedures established		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<u>Flemington Estate</u> During site visit at general store at Main Division and New Coconut Division, sighted used paint containers and used batteries which is scheduled waste were not stored in the designated scheduled waste store with no waste information.		
Corrections:	The estate management has relocated the SW102 inside SW Store. Labels have been placed as well.		
Root Cause Analysis:	Misunderstanding between storekeeper & operation team. The storekeeper wrongly placed SW102 in general stores as she taught that the batteries are to be used again in future.		
Corrective Actions:	The batteries have been relocated in SW Store – SW102 compartment. The storekeeper has been informed to ask the field staff/foremen/assistant once received SW102 material as to get clear picture and clarification whether it is still to be used or disposed. Training to SW Operator will be done as one of annual training (will be conducted on SOU basis & trained by CEPWAM, experience estate management or Regional Sustainability Management team) The inventory of the used batteries & other SW will be monitored through e-SWISS.		
Assessment Conclusion:	Recurrence of issue observed at Bagan Datoh Estate with regards to schedule waste management. The previous NC was not closed effectively and upgraded to Major/Critical NC under the same indicator		

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Non-conformity			
NCR Ref #	1930293-202007-N2	Date Issued	17/7/2020
Due Date	In the next surveillance assessment	Date of nonconformity Closure	22/10/2021
Clause & Category (Critical / Minor)	4.2.3 (minor)		
Statement of Nonconformity:	The complainants were not informed of the grievances progress, including against agreed timeframe and the outcome is no available and yet to be communicated to the relevant stakeholders.		
Requirement Reference:	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.		
Objective Evidence:	<p>In Sg Samak Estate, it was found that representatives from workers and stakeholders has grievances as sighted in the NUPW minutes of meeting and Stakeholder Minutes of meeting. Some issues were still pending and the status was not communicated to the complainant as below:</p> <ol style="list-style-type: none"> 1. Contractors: Poor road condition for FFB transportation. 2. NUPW/Workers: The septic tank repairs were not completed and difficult for the workers to use toilet. 		
Corrections:	Estate management informed complainers on status of their complaint on 17/7/2020.		
Root Cause Analysis:	Missing in agenda meeting on the stakeholder concerns & its mitigation plan status in the management meeting.		
Corrective Actions:	Estate management will improve communication to the complainers and keep them inform progress of work accordingly through. As per standard procedure, the estate will inform immediately after completing or at least once in 2 weeks if still in progress. The status of any complaint's issues will be discussed in MR meeting or operation meeting (monthly) while Gender committee will be discussing the issue if relevant to their committee complaint (quarterly). The whole year issue will bring forward and update on the next stakeholder meeting (Annual).		
Assessment Conclusion:	Verification made to the grievance and complaints records, it was found that complainants were being informed on the status as reported in the complaint book and related meeting minutes in the NUPW and gender committee meeting minutes. No recurrence of issues observed, thus the minor NC is closed effectively on 22/10/2021. Continuous implementation will be further verified in the next assessment.		

Non-conformity			
NCR Ref #	1930293-202007-N3	Date Issued	17/7/2020
Due Date	17/7/2020	Date of nonconformity Closure	22/10/2021
Clause & Category (Critical / Minor)	6.7.2 (minor)		

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Statement of Nonconformity:	First Aid Kit contained expired items.
Requirement Reference:	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.
Objective Evidence:	During the site visit at Sungai Samak Estate Nursery, it was sighted that the First Aid Kit had an expired item (Iodine – 03/2020). Further investigation indicated that the first aid box at the Nursery was not included in the monitoring list as it has been removed from the First Aid Inventory as confirmed by the MA
Corrections:	All the related workers has been explained on the accident procedures accordingly.
Root Cause Analysis:	SSE nursery going to close by August 2020. All nursery workers has been transferred to field work but some of them will be used for nursery as and when required only. These workers were not being informed properly regarding their accident procedure where they were supposed to refer to the estate dispensary which is located only about 200m from the nursery.
Corrective Actions:	To improve on communication between management and workers if there is any new changes in safety procedures in the estate.
Assessment Conclusion:	Verification made to the First aid record at Sg Samak Estate, first aid monitoring was carried out every month by MA. The record showed that the last inspection done on September 2021 and training was given to staff and workers on 30/6/2021 by MA. Interview with MA and one of the first aider, daily reminder during morning muster is a must prior to work and instruction will be given to ensure all first aid box was in good condition. No recurrence of issues observed, thus the minor NC is closed effectively on 22/10/2021. Continuous implementation will be further verified in the next assessment.

Non-conformity			
NCR Ref #	1930293-202007-N4	Date Issued	17/7/2020
Due Date	17/7/2020	Date of nonconformity Closure	22/10/2021
Clause & Category (Critical / Minor)	2.1.2 (minor)		
Statement of Nonconformity:	Permit Scheduled Control Items (Diesel, Petrol, Liquid Petroleum & Sugar) has expired.		
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:	<u>Sungai Samak Estate</u> Permit Scheduled Control Items (Diesel, Petrol, Liquid Petroleum & Sugar)Registration Number: KPDN/BPGK/TIN/PBKB/0055/19; valid from 9/7/2019 till 18/7/2020. The license has expired and was only requested to be renewed on		

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	12/7/2020. The management has not received the new license. The mechanism to monitor the validity period of the licenses was not implemented.
Corrections:	Support letter from KPND has been obtained on 17/7/2020 and already sent to Fire Department on the same day for their inspection and verification. BOMBA has already visited estate on 23/7/2020 to verify safety measures on storage tank/store. KPND will issue license once received report from Fire Department.
Root Cause Analysis:	No dedicated person who responsible in the monitoring the license and permit
Corrective Actions:	All license already displayed at main office entrance for easy checking and monitoring. In addition, the person in charge (Secretary of OSHC) will take the responsibility for all licenses and permits and the license and permit status will be presented & monitored through OSH Meeting / Operation Meeting.
Assessment Conclusion:	The permit was renewed and valid during assessment, the monitoring was done by management during ESH meeting and sampling on record 15/7/2021 showed that the record was available for verification. No recurrence of issues observed, thus the minor NC is closed effectively on 22/10/2021. Continuous implementation will be further verified in the next assessment

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil
OFI 2	

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1930293-202007-M1	Critical	3.4.3	17/7/2020	Closed on 2/10/2020
1930293-202007-M2	Critical	6.2.3	17/7/2020	Closed on 2/10/2020
1930293-202007-M3	Critical	6.7.3	17/7/2020	Closed on 2/10/2020
1930293-202007-N1	Minor	7.3.2	17/7/2020	Previous NC was not effectively closed and upgraded to Major NC under the same indicator.
1930293-202007-N2	Minor	4.2.3	17/7/2020	Closed on 22/10/2021
1930293-202007-N3	Minor	6.7.2	17/7/2020	Closed on 22/10/2021
1930293-202007-N4	Minor	2.1.2	17/7/2020	Closed on 22/10/2021
2121039-202110-M1	Major	7.3.2	22/10/2021	Closed on 15/12/2021
2096510-202108-N1	Minor	6.7.5	25/8/2021	"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 Flemington POM Certification Unit's environmental and social performance, legal and any known dispute issues.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace 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)
Communities	Sundry shop (Kedai Sg Dua) Villagers <ul style="list-style-type: none"> - Kampung Kebun Sayur - Kampung Sg Timah - Kampung Bagan Datuk 	Face to face interview
Contractor	Contractor/supplier/vendor <ul style="list-style-type: none"> - Lotus Two Enterprise - Perumalsamy Enterprise - Warisan Yusro - MK Kumar Enterprise - Onn's Enterprise 	Face to face interview
Union	NUPW Representatives	Face to face interview
Internal	Gender Committee Representatives & female workers	Face to face interview
Internal	Foreign workers by nationalities	Face to face interview

Stakeholders comment	
1	Feedbacks: Village representative – Good cooperation given by Sime Darby Plantation management team from mill and estates. Contributions not only monetary but also manpower was given if there is any such assistance required. So far no land encroachment from Sime Darby Estate and Mill receive outside crop from the neighbouring smallholders/dealers. Job opportunity were given to the locals however, only a few people interested with the estate job.

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	Audit Team verification and response: The management will continue to maintain good relationship with neighbouring villagers and contribute whenever necessary
2	Feedbacks: Vendor/supplier/contractor – All jobs/contracts offered were official via purchase order or contract and local work order. Payment was done in promptly manner as per agreed term and conditions. They have signed agreement and Vendor Integrity Pledge @ VIP as part of self-declaration on due diligence process.
	Audit Team verification and response: The management will continue to ensure payment make promptly and maintain good relationship with the suppliers/vendors/contractors.
3	Feedbacks: NUPW Representatives – They informed that no pending issue during the time of audit. They will discuss with the management if there is any issue reported. Workers are paying in accordance with Minimum Wage Order 2020.
	Audit Team verification and response: The management will continue to ensure the workers are paying accordingly. No other issue.
4	Feedbacks: Gender Committee Representatives & female workers – They informed that no sexual harassment and violence case reported since last audit. The female workers understand the function of Gender committee and aware of the complaint mechanism if there is any issues. They were treated equally without any discrimination by the management.
	Audit Team verification and response: The management will respect the rights of female employees and monitor if there is any case of sexual harassment and violence happen. No further issue.
5	Feedbacks: Foreign workers – They did not pay any recruitment fee for getting a job in Sime Darby. They have been briefed on the terms and conditions and working environment in the plantations while they were in home country. No contract substitution occurred. Their wages are paid according to Minimum Wage Order 2020 and overtime was offered to them on voluntary basis.
	Audit Team verification and response: The management will continue to ensure employment law is being complied with.

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					

Not applicable as Sime Darby acquired (freehold and leased) all the land directly from the state of Perak State government. All the estates in SOU 4 Flemington currently in second planting cycle.



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

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3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Strategic Operating Unit (SOU 4) – Flemington Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Strategic Operating Unit (SOU 4) – Flemington Palm Oil Mill is certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidir Bin Zainal Abidin	Name: YUSRI BIN ISA
Company Name: BSI Services (M) Sdn Bhd	Company Name: SIME ORRISY PLANTATION BERHAD, BAGAN PATUH ESTATE
Title: Lead Auditor	Title: SENIOR MANAGER
<p>Signature:</p> 	<p>Signature:</p> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
Date: 24th December 2021	Date: 24/12/2021

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Documents required for all unit of certification available in Flemington POM Certification Unit:</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 <p>Sustainability Reports, policies and procedures are also accessible through the company’s website: http://www.simedarbyplantation.com/</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All the related information was in Bahasa Malaysia and English and accessible to the stakeholders upon request.</p>	Complied

<p>1.1.3</p>	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>External stakeholder meeting was carried out by reaching out the stakeholders for any arising issues. Letter sent to the stakeholders on the postponement and they need to return any issue/comment/suggestion to the estate management. For example an email sent to stakeholders (mainly outside crop producer @ OCP, government agencies,) on 19/7/21 by Sandakan Bay POM was verified. Any feedbacks via email reply/questionnaire form will be used for the inputs on the review of SIA management plan.</p> <p>Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The mill and estates maintain the records of all request and response. Sighted the records of request from the stakeholders as follows:</p> <ol style="list-style-type: none"> 1. Flemington POM: DOSH comments during annual inspection on 21/1/21. The inspector highlighted a few issues related unfired pressure vessel (UPV) conditions which require further rectification. Status: All comments highlighted rectified and renewal of CF for the said UPVs were granted. 2. Flemington Estate: Kg Tanah Lalang – Issue: Effluent from estate drain flown to the nearby village drain. Action/status: No untreated effluent flown to the nearby drain as claimed by the complainant. Water analysis was done to confirm the parameter limit for discharge. This has been explained the complainant and the issue is considered closed. 3. Sg Samak Estate: Fame Transportation requested Management to repair the main access road for lorry movement to avoid accident and lorry damage. Status: Repairs and road maintenance is as per schedule. Received materials for road repairs and will start road repairs with immediate effect. Additionally, road repair budget for 2021 has been approved for RM 300,000 under Capital Expenditure (CAPEX). 	<p>Complied</p>
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		Sabak Bernam Estate: Kampung Batu 2 Sepintas complaining that cattle roaming has caused the accident. Status: Meeting and engagement process has started and cattle owner has been informed on that matter. Estate has upgraded the existing gate to prevent cattle incursion to the estate. Cattle watchman has been arranged for daily patrolling.	
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>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</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>	The mill and estates List of Stakeholders are available detailing the relevant stakeholders. Stakeholders includes Contractors, suppliers, FFB suppliers, government agencies, non-governmental agencies and local communities.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	Sime Darby Plantation has developed and implemented Code of Business Conduct (Aug 2020) where the company implemented the integrity, respect & responsibility, enterprise and excellence during any business process. The policy was developed in Bahasa Malaysia, English and Bahasa Indonesia which can be downloaded via https://www.simedarbyplantation.com/corporate/ethical-business-practices .	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	Sime Darby Plantation has implemented Whistleblowing Policy to help all stakeholders raise concerns, without fear of retaliation on any wrongdoing that they may observe in Sime Darby Plantation Group. The channels of whistleblowing are such as E-form that	Complied

		<p>could be downloaded via https://www.simedarbyplantation.com/corporate/whistleblowing or through email, call or write letter to the Whistleblowing unit in Head Office. Besides, the company established Internal Audit to monitor the compliance and implementation of the policy throughout the plantations. Sampled the contractors and vendors signed on Vendor Integrity Pledge:</p> <ul style="list-style-type: none"> i. Company: Deen Mulia Enterprise, Registration No.: IP 0178917V ii. Company: Lotus Two Enterprise, Registration No.: MA 0120306-X iii. Company: MS Ramu Enterprise, Registration No.: IP 0108185-U iv. Company: Alpha Meta Agencies, Registration No.: IP0027919 P 	
<p>Principle 2: Operate legally and respect rights</p>			
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
<p>2.1.1</p>	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>Flemington POM and Supply bases have continued 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. Flemington POM & Supply Bases have obtained and renewed licenses and permits as required by the law. Sample of licenses and permit viewed were:</p> <p><u>Flemington POM</u></p> <ul style="list-style-type: none"> i)_Energy Commission – Lesen Bagi Pemasangan Persendirian; License No: 2020/01964; Validity Period until 29/10/2021. ii) MPOB License; License No: 529874004000; License Validity until 31/5/2022 	<p>Complied</p>

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		<p>iii) Weighbridge calibration was been done by Metrology S.Report No; A-04394 dated 17/6/2021</p> <p><u>Bagan Datoh Estate</u></p> <p>i) MPOB License; License No: 525521002000; License Validity period: 1/1/2021 till 31/12/2021</p> <p>ii) Permit Barang Kawalan Berjadual (Diesel); Reference Number: KPDNHEP.TL600-4/3/97; Validity Period: 5/11/2020 till 4/11/2021.</p> <p>iii) Air Compressor License; Registration Number: PK PMT3646 valid until 9/8/2022.</p> <p><u>Flemington Estate</u></p> <p>i) Permit Barang Kawalan Berjadual (Petrol & Diesel); Reference Number: KPDN/BPGK/TIN/PBKB/0084/19; Valid from 30/10/2019 till 29/10/2020</p> <p>ii) Air Compressor License; No. Pendaftaran: PMT 103618; valid till 14/10/2021</p> <p>iii) MPOB License; License Number: 525193002000; Valid from 1/12/2020 till 30/11/2021</p> <p><u>Sabak Bernam Estate</u></p> <p>i) MPOB License; License No: 54589002000; License Validity Period: 01.02.2021 till 31.01.2022.</p> <p>ii) Permit Barang Kawalan Berjadual (Diesel); Reference Number: SL/KSL/07/19/SK; License Validity: 25./2/2020 till 24/2/2021. The management already follow up with the authorities and still in progress as per evidence email dated 18/8/2021.</p> <p>iii) Air compressor SL PMT 4704 was available the permit from DOSH in estate already expired on March 2021, the estate already applies for renew as per evidence email 20 August 2021. This email was follow up from Jan 2021.</p>	
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		<p><u>Sg Samak Estate</u></p> <p>i) MPOB License (Nursery); License Number: 534975011000; Valid from 1/1/2021 till 31/12/2021</p> <p>ii) License for Diesel 19,000 liter and Petrol 2,700 liter (KPDNHEP.TI.500-4/3/55) was available and valid till 25/8/2021</p> <p>Flemington POM has obtained approval from <i>Jabatan Tenaga Kerja Semenanjung Malaysia</i> for the following:</p> <ul style="list-style-type: none"> i. Ref. No.: BHG. PU/9/129 JLD 3 (53) dated 06/07/2017 for deduction of wages for electricity bill. ii. Ref. No.: BHG. PU/9/134 JLD 9 (11) dated 27/03/2017 for overtime limit for 130 hours. 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>SOU4 Mill and Estates have documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. Evaluation of the legal requirements and compliance status with legal requirement are monitored by the operating units.</p> <p>Tracking system to identify changes in the relevant regulations were available through the head office, website information and is communicated from the Group Head Office. Sighted the latest review to include new updates for Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019, Minimum Wages Order 2020, Auxiliary Police Regulations 1970, Movement Control Order 2020 & Akta Pencegahan & Pengawalan Penyakit Berjangkit 1988. As per verification on site, the KPDNHEP.TI.600-4/3/55 valid</p>	Complied

		<p>from 26/8/2021 until 25/8/2024 for Diesel (19,000 Liter) and Petrol (2,700 Liter).</p>	
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>All legal boundaries were clearly demarcated and visibly maintained, and there was no planting beyond the legal boundaries.</p> <p><u>Flemington POM</u></p> <p>The mill is located in the vicinity of New Coconut Division, Flemington Estate. The land title, Grant Ownership Number: 14181; Lot Number: Lot 5138. The area surrounding the mill has been fenced to visibly demarcate the boundary of the mill with the estate.</p> <p><u>Sungai Samak Estate</u></p> <p>The estate has visibly demarcated the boundaries of the estate by placing boundary stones and boundary packs along the borders. A boundary markers map was available in the estate. Visit to the boundary of the estate with smallholder (Norila) at location - 003° 47'07" N, 101° 09'57" E, indicated that the markers were well maintained.</p> <p><u>Sabak Bernam Estate</u></p> <p>The estate has established boundary markers and boundary stones to demarcate the legal boundary of the estates with their surrounding neighbours. Visit to the field indicated all boundary stones and boundary markers were well maintained and clearly visible.</p> <p><u>Bagan Datoh Estate</u></p> <p>The estate has established boundary markers (Red Poles) to demarcate the legal boundary of the estates with their surrounding neighbours. Visit to Field 2014B indicated that the boundary marker (004° 01'47" N, 100° 50'23" E) was visible and well maintained and clearly shows the boundary with the smallholders.</p>	<p>Complied</p>

Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	The list of contracted parties at the mill and estates are made available in the List of Stakeholder. The contracted parties include for labour resources, FFB supply and short-term vendors.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	Contract and <i>Ikrar Intergiti Vendor</i> (Vendor Integrity Pledge) on Vendor Code of Business Conduct (VCOBC)) addendum is in place to demonstrate agreement between SDP and vendors had include specific clauses to meet applicable legal requirements. In section 3 of the VCOBC stated the vendors are obliged to familiarise themselves with and adhere to all applicable policies, procedures, laws and regulation of the countries in which they operate. Sample of contracts verified: <u>Flemington POM</u> i) Contractor: Lotus Two Enterprise, valid until 30 th April 2022. ii) Contractor: Deen Mulia Enterprise, valid until 31 st December 2021 iii) Contractor: MS Ramu Enterprise, valid until 31 st December 2022 <u>Flemington Estate</u> i) Contractor: Oons Enterprise, valid until 30 th March 2021. Under tendering processing. Local work order issued on monthly basis for current task. ii) Contractor: M Rajan Contractor Sdn Bhd, valid until 30 th March 2021. Under tendering processing. Local work order issued on monthly basis for current task. <u>Bagan Datoh Estate</u> i) Contractor: Fame Transportation Sdn Bhd, valid until 31 st August 2021. In progress of extension (processed by procurement department, HQ)	Complied

		<p>ii) Contractor: M Rajan Contractor Sdn Bhd, valid until 31st December 2021 <u>Sg Samak Estate</u></p> <p>i) Perumalsamy A/L Ellumali, valid until valid until 31st December 2021</p> <p>ii) Warisan Yusro, valid until valid until 31st December 2021 <u>Sabak Bernam Estate</u></p> <p>i) Alpha Meta Agencies, 31st August 2021. Under tendering processing. Local work order issued on monthly basis for current task.</p> <p>Due diligence process was seen based on conduct of audits by SQM and OSH team as part of self-regulatory approach.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Contract agreement and <i>Ikrar Intergiti Vendor</i> (Vendor Integrity Pledge) on Vendor Code of Business Conduct (VCOBC) addendum is in place to demonstrate agreement between SDP and vendors had include in clause 5.7 and 5.8 to abolish child labour, forced labour and trafficked labour.</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>Flemington POM receives crop from the Sime Darby Plantation Berhad estates, mainly from Sabak Bernam Estate, Sungei Samak Estate, Flemington Estate and Bagan Datoh Estate or other if any are from diversion from the sister mills as results of breakdown or annual maintenance. The mill also receives OPC @ Outsider Estates crop but only until mid of July 2021. Starting from 24th July onwards, no more OCP received at Flemington POM as the management has decided to upgrade MB to IP module</p>	Complied

2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>Information with regards of indirect source of FFB from out-growers are still in progress. As minimum, a valid MPOB license is required for registration and evidence of legality. Starting from 24th July onwards, no more OCP received at Flemington POM as the management has decided to upgrade MB to IP module.</p>	Complied																														
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>																																	
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>																																	
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER, and KER, OPEX, CAPEX etc. Flemington Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year. The progress is monitored through monthly progress reports that are developed by the operating units and provided to the top management where the progress on expenditure, performance and yield is assessed.</p>	Complied																														
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The replanting in estate already been programme for 5 year projected as per below sample:-</p> <table border="1" data-bbox="1137 1027 1930 1329"> <thead> <tr> <th>Estate</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Bagan Datuh</td> <td></td> <td></td> <td>152.39</td> <td>151.57</td> <td>48.24</td> </tr> <tr> <td>Flemington</td> <td></td> <td></td> <td></td> <td>70.81</td> <td>33.39</td> </tr> <tr> <td>Sg Samak</td> <td>116.57</td> <td>157.74</td> <td>144.73</td> <td>145.64</td> <td>61.44</td> </tr> <tr> <td>Sabak Bernam</td> <td>--</td> <td>-</td> <td>-</td> <td>--</td> <td>-</td> </tr> </tbody> </table>	Estate	2022	2023	2024	2025	2026	Bagan Datuh			152.39	151.57	48.24	Flemington				70.81	33.39	Sg Samak	116.57	157.74	144.73	145.64	61.44	Sabak Bernam	--	-	-	--	-	Complied
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3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has develop Standard Operating Procedure (SOP) for Sustainable Supply Chain and Mill Management review was done on 5/7/2021 Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019, Section 20.0 where management review will be reviewed annually. The management review mainly discusses the internal audit findings and the performance of the operating units since the last review. The management review meeting minutes was sighted as follows sampling;-</p> <p>Flemington estate, management review was conducted on 18/6/2021</p> <p>Bagan datuk estate, management review was done on 25/6/2021</p>	Complied
<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>Continuous improvement is established covering the social, environmental and safety impacts in the operating units. The action plan established focusing on:</p> <ul style="list-style-type: none"> i. Communication and whistle blower ii. Dumping rubbish out site estate iii. Increase awareness on safety and health iv. To resurface road and office compound area with milling waste v. To maintain 5S work standard in all operation 	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:</p>	<p>The data verification showed that RSPO template was accurate, such as LTA and workers record was according to record available in estate and Palm GHG.`</p>	Complied

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	<p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>		
<p>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 2/1/2008 and Agricultural reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU8 as a guidance document to conduct estate operation. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation etc.</p> <p>Palm Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. 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>Complied</p>
<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Sime Darby has established mechanism to monitor the implementation of their procedure by Mill advisor/ Plantation Advisor Visit, Structured Oil Recovery Assessment (SORA) and Planning and Monitoring Unit, Performance Monitoring Visit and Agronomist Visit. The visit focusing on Yield Improvement, Crop Recovery, Replanting and Immature Palms Maintenance and Mature Upkeep on all aspect of operations in the mill and estates.</p>	<p>Complied</p>

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3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The estates and mill visited maintained all records of visit and monitoring and available at the office for review. Sighted the sampled records as follows: <u>Flemington Palm Oil Mill</u> The latest Regional Chief Engineer Visit was done on 8&9/3/2021. The report covering on process control/safety, process losses, product quality, housekeeping/upkeep/environment and security. No major issue issued from the visit. All issue raised has been rectified and addressed by the mill management. The sampling as per below:- <u>Flemington estate</u> Regional GM visit was done on June 2021 and previously was on Feb 2021. <u>Bagan Datoh estate</u> Plantation Advisor (NRT SOU4/BDE/2/2021) dated visit 11/2/2021	Complied
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	There is no new planting in SOU4 (Flemington POM Certification Unit). Sighted the Social Impact Assessment (SIA) carried out by PSQM team on 27/6 – 1/7/2016. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety and health, living condition, infrastructure and amenities and stakeholder engagement were	Complied

		<p>assessed accordingly. The report includes both positive and negative impact and its recommendation.</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>For environmental aspect and impact assessment was conducted the review on Jan 2021. New activity such as turbine changes been done also been included in the aspect and impact.</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>The assessment was conducted base on Standard Operation Manual; subsection 5.4; Planning and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure. In the SOP stated the POM and Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts. Sampling in Mill, for environmental aspect and impact assessment was conducted the review on Jan 2021. New activity such as turbine changes been done also been included in the aspect and impact. The other estate no changes and new activity as per previous report.</p> <p>Social management plan has been reviewed for all operating units on annual basis. SIA plan sighted as the following:</p> <table border="1" data-bbox="1153 1220 1904 1364"> <thead> <tr> <th>Estate/Mill</th> <th>Date of review</th> </tr> </thead> <tbody> <tr> <td>Flemington POM</td> <td>28/05/2021</td> </tr> <tr> <td>Flemington Estate</td> <td>21//8/2021</td> </tr> </tbody> </table>	Estate/Mill	Date of review	Flemington POM	28/05/2021	Flemington Estate	21//8/2021	<p>Complied</p>
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		<table border="1"> <tr> <td>Bagan Datoh Estate</td> <td>30/6/2021</td> </tr> <tr> <td>Sg Samak Estate</td> <td>1/1/2021</td> </tr> <tr> <td>Sabak Bernam Estate</td> <td>27/5/21</td> </tr> </table> <p>The management plan has been developed after compilation the feedbacks and issues during various of meeting such as stakeholder meeting, union meeting and gender committee meeting. During this COVID19 pandemic, no face to face session meeting carried out with the stakeholders. A different approach is currently being used by sending out feedback form to the stakeholders. Summary of issues raised will be incorporated in the SIA management plan for further monitoring.</p>	Bagan Datoh Estate	30/6/2021	Sg Samak Estate	1/1/2021	Sabak Bernam Estate	27/5/21	
Bagan Datoh Estate	30/6/2021								
Sg Samak Estate	1/1/2021								
Sabak Bernam Estate	27/5/21								
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The social management plan was implemented, reviewed and updated on yearly basis in the participatory way by collected feedbacks during meeting with stakeholders. Seen the Social Management Plan 2021 in both mill and estate where the issues captured in the stakeholder meeting, Union/NUPW meeting, Workers Welfare & Housing Committee meeting were included. Among issues raised by the stakeholders and captured in the social management plan summarized as per below:</p> <ol style="list-style-type: none"> 1. Flemington POM: DOSH comments during annual inspection on 21/1/21. The inspector highlighted a few issues related unfired pressure vessel (UPV) conditions which require further rectification. Status: All comments highlighted rectified and renewal of CF for the said UPVs were granted. 2. Flemington Estate: Kg Tanah Lalang – Issue: Effluent from estate drain flown to the nearby village drain. Action/status: No untreated effluent flown to the nearby drain as claimed by the complainant. Water analysis was done to confirm the 	Complied						

		<p>parameter limit for discharge. This has been explained the complainant and the issue is considered closed.</p> <ol style="list-style-type: none"> 3. Sg Samak Estate: Fame Transportation requested Management to repair the main access road for lorry movement to avoid accident and lorry damage. Status: Repairs and road maintenance is as per schedule. Received materials for road repairs and will start road repairs with immediate effect. Additionally, road repair budget for 2021 has been approved for RM 300,000 under Capital Expenditure (CAPEX). 4. Sabak Bernam Estate: Kampung Batu 2 Sepintas complaining that cattle roaming has caused the accident. Status: Meeting and engagement process has started and cattle owner has been informed on that matter. Estate has upgraded the existing gate to prevent cattle incursion to the estate. Cattle watchman has been arranged for daily patrolling. <p>The environmental management plan established based 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 the EAI/EIE conducted. The plan stated the Environmental issue, mitigating measures and person responsible. The plan was reviewed on annually basis.</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>The Human Resource Department in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016) to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. The latest recruitment of workers in Flemington Palm Oil Mill was on August 2021. A copied of identification card was kept as record. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish a job vacancy advertisement at the places nearby the villages.</p>	Complied
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SOU4 have 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. Appropriate control measure has been determined and revised in the HIRARC register for the year 2021.</p> <p>For Flemington Mill the risk of all operations have been assessed and HIRARC was available for verification at Flemington POM. Sighted the latest review of HIRARC for Despatch operator work station reviewed due to an accident that occurred on 24/6/2021. Among other HIRARC sighted was Covid-19, Reception Station, Fruit Handling Station, Sterilisation Station, Threshing Station and laboratory.</p>	Complied

		<p>The audiometric test was conducted on 10/9/2020 for a total of 62 workers at Flemington POM with the results indicating 7 workers with hearing impairment, 5 worker with standard threshold shift. The retest already been conducted by management on 22/1/2021. CHRA (HQ/09/ASS/00/124-2020/0026) was conducted on 2/7/2020 by Shaari Chin (HQ/09/ASS/00/124) from GATCONST Sdn Bhd. The report available for review at site.</p> <p>In Bagan Datuk estate, the CHRA been conduct by GATCONST Sdn Bhd (Hj Shaari Chin) ref no; HQ/09/ASS/00/124-2020/0021 dated 17/6/2020. From the recommendation the foremen need to attend personal exposure monitoring for manganese. The management conducted the baseline chemical exposure monitoring was on 26/4/2021 ref. no. HQ/17/JHI/00/00012-2021/045. From the result the exposure was low than MEL(maximum exposure limit) 12.88mg/m3 (standard MEL: 15mg/m3)</p>	
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>The effectiveness of the HIRARC is monitored and ensured through checklist and trainings that were conducted by Flemington POM and its supply base estates in each of the operations. Site visits around the mill and estates indicated the control measures as per HIRARC and SOPs were followed and ensured by the respective management units. H&S is also monitored via the checklists available in the estates and mills via the Quarterly Work Site Inspections (WSI). The findings of the WSI is submitted to the Head Quarters and discussed at the quarterly OSH Meetings in the estates and mill for the attention of the management and further improvements. The estate and mills also have checklist to monitor the usage of PPE. OSH Training Programme are in place to ensure regular trainings are conducted in line with the Training Needs Analysis.</p>	Complied

Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.

3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>A training programme has been developed and available in the Training Requirement for Operating Units (Mills & Estate). The trainings were sighted to have included Gender Specific Training and involves staffs, workers and contractors. The training record can be refer as per indicator 3.7.2.</p>	Complied																																
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of trainings were maintained by the Mill and all estates as below:</p> <table border="1" data-bbox="1153 671 1928 1390"> <thead> <tr> <th>Estate</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Flemington Mill</td> <td>RSPO Training</td> <td>14/4/2021</td> </tr> <tr> <td>COBC and Policy training</td> <td>29/3/2021</td> </tr> <tr> <td>HCV and biodiversity training</td> <td>3/6/2021</td> </tr> <tr> <td>First aid training</td> <td>20/5/2021</td> </tr> <tr> <td>Waste management training</td> <td>25/3/2021</td> </tr> <tr> <td rowspan="4">Bagan datuh</td> <td>First aid training</td> <td>14/1/2021</td> </tr> <tr> <td>Spraying and chemical handling training</td> <td>3/6/2021</td> </tr> <tr> <td>HCV and biodiversity</td> <td>3/6/2021</td> </tr> <tr> <td>Waste management training</td> <td>25/3/2021</td> </tr> <tr> <td rowspan="4">Flemington estate</td> <td>First aid Training</td> <td>10/6/2021</td> </tr> <tr> <td>Harvesting training</td> <td>14/4/2021</td> </tr> <tr> <td>ERP & Fire drill training</td> <td>18/6/2021</td> </tr> <tr> <td>Induction training</td> <td>2/7/2021</td> </tr> </tbody> </table>	Estate	Training	Date	Flemington Mill	RSPO Training	14/4/2021	COBC and Policy training	29/3/2021	HCV and biodiversity training	3/6/2021	First aid training	20/5/2021	Waste management training	25/3/2021	Bagan datuh	First aid training	14/1/2021	Spraying and chemical handling training	3/6/2021	HCV and biodiversity	3/6/2021	Waste management training	25/3/2021	Flemington estate	First aid Training	10/6/2021	Harvesting training	14/4/2021	ERP & Fire drill training	18/6/2021	Induction training	2/7/2021	Complied
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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Relevant personnel to supply chain implementation as defined by the Certification Unit are the personnel that are involved in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor & assistant and weighbridge operators. The latest RSPO SCCS training was carried out as follows:</p> <ul style="list-style-type: none"> - RSPO SCCS Training – 28/6/2021 - RSPO SCCS Training for Contractor – 1/9/2021 	Complied
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>As per SOP established and documented in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under Glossary section define 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.</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 SOP established and documented in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under Glossary section define 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. Mill already convert to IP and stop receiving OCP</p>	Complied

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		crop start 24/7/2021 and also as per memo proposal for upgrade from mass balance module to IP module (Ref. No: OCP/IOM/Aug2021/Proposal/001) that been release by Sime Darby HQ dated 8/8/2021.	
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK is available in the public summary report. Flemington POM has registered the PalmTrace ID: RSPO_PO1000000294 for RSPO certified transaction.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The estimated tonnage of CPO and PK is available in the public summary report. Flemington POM has registered the PalmTrace ID: RSPO_PO1000000294 for RSPO certified transaction.	Complied
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 Berhad has develop Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019 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>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Addressed in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 18.0 Internal Audit. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP.</p> <p>Combined internal audit for supply chain was last conducted on 18/6/2021 by Sustainability compliance unit team. No finding for RSPO SCCS during this audit.</p> <p>The results of Internal Audit were discussed in the Management Review Meeting as sighted in minutes meeting conducted on 5/7/2021 under section 2: Results of Internal Audit.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p>	<p>Addressed in the Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain</p>	Complied

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	<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>and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 6.0 delivery FFB from Estate.</p> <p>Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and uncertified FFB. Records verified by internal and external audit.</p> <p>Flemington mill have system to verify at the weighbridge. Information for RSPO certified FFB were recorded in FFB Consignment notes and weighbridge tickets. Records verified during the audit as follow:</p> <p>Bagan Datoh estate No Ticket: 88252 Date: 19/8/2021 RSPO Cert No: RSPO 590802 Weight: 9,450kg</p> <p>Flemington estate No Ticket: 73841 Date: 19/8/2021 RSPO Cert No: RSPO 590802 Weight: 10,155kg</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil</p>	<p>The mill not yet produce The IP mill, no record of IP CPO or PK out from the Flemington Mill however some verification was done on the Mass Balance CPO. All the information required by the standard was available in various shipping documents such as transporter's</p>	<p>Complied</p>

	<p>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>delivery order, mill's weighbridge, buyer's receiving notes, to name a few. The following contracts were verified:</p> <p>CPO (Mass Balance Module) Ticket no: M174P0019703 Buyers: Sime Darby Oils Date : 25/6/2021 Lorry No: BLB5142 Product: CPO RSPO MB Contract: S/C-PSD/2106/CPO0059 RSPO Cert no: RSPO 590802</p> <ul style="list-style-type: none"> e) Quantity: 39,050kg 	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. 	<p>Sime Darby has established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019, Section 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>The list of outsourced contractor was sighted, "list of stakeholder as at 2021" include the transport contractor for CPO transporter Mayang Bayumas Sdn Bhd.</p> <p>Sighted the sampled contracts between The Sime Darby Plantation Bhd. with CPO transporter Mayang Bayumas Sdn Bhd dated 1/6/2021. Requirement to adhere to RSPO supply chain standard is clearly defined in the agreement and the contractors have acknowledged on the requirements to be complied.</p>	<p>Complied</p>

	<p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>		
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.	Stated in the contract agreement between The Sime Darby Plantation Berhad. with CPO transporter Mayang Bayumas Sdn. Bhd. dated 1/6/2021. The list of transporter was under 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.	<p>Stated in the contract agreement between The Sime Darby Plantation Berhad with CPO transporter Mayang Bayumas Sdn. Bhd. dated 1/6/2021 stated the contractors have to comply as follows;</p> <ul style="list-style-type: none"> i. Comply with local legal requirements ii. Attend the RSPO/MSPO/SCCS briefing or training organized by the company iii. Having signed and enforceable agreement with the company iv. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary v. Having related working permits vi. Ensure PPE utilization by contractors' employee while being in the company premise. 	Complied

<p>3.8.12</p>	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<ul style="list-style-type: none"> i. Sime Darby Plantation Berhad Bhd has established Standard Operating Procedure to maintain all records of evidence on the implementation of RSPO SCCS. The SOP was documented in Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records. ii. As stated in SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records all traceability records should be maintained at minimum period of 3 years. iii. Flemington POM receives and process both certified and noncertified FFB. Therefore, it uses the Mass Balance supply chain system and module. <ul style="list-style-type: none"> a. Flemington POM has established the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. b. All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to conversion ratios of OER and KER as per sample records of Mill production report July 2020 – June 2021 and FFB summary July 2020 – June 2021 c. Positive stock deliveries maintained through the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. No short selling made by SDPOM for mass balance module. 	<p>Complied</p>
<p>3.8.13</p>	<p>Extraction Rate</p>	<p>No extraction rate for IP module yet, the Mill in progress to produce IP CPO. Mill stop receiving OCP crop start 24/7/2021. Extraction rates were derived from actual production output that were</p>	<p>Complied</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.	measured daily by the mill and recorded in the daily production report.	
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estate	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	The mill in progress to produce IP CPO, there 2 tank already prepare for kept IP CPO and the mill already done flushing process start 26/7/2020. Mill already stop receiving OCP crop since 24/7/2021 and last MB CPO available was on 30/7/2021 and already sell out. Flemington will be start produce IP CPO and PK starting September 2021 as per plan and only received RSPO certified FFB.	Not Applicable
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	Based on the downloaded transactions register from the certification unit's PalmTrace, the company was able to demonstrate that it has been registering its transactions in the PalmTrace accordingly. Based on the announcement (transaction) summary, all the registrations were found to be in order. This transaction was based on mass balance module. The IP module CPO transaction still in progress for production. No record of transaction of RSPO IP CPO during this audit.	Complied
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	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 Flemington POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	Not applicable as no off-product claim made by Flemington POM as to date.	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.	Not applicable as no off-product claim made by Flemington POM as to date.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Flemington POM as to date.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Flemington POM and verified through document and site review (notice board, business card, shipping documentation, etc.	Complied
Business to business communications			

5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication was demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	No record of IP CPO Shipping during this audit, however the record of Shipping documentation verified and conformance with the requirements of RSPO SCCS for MB CPO. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (CPO/Palm Kernel RSPO MB) and RSPO certificate number; RSPO 590802. Last transaction was on 5/8/2021 (TR-e22d1ae7-c3e1).	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Flemington POM was not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	Flemington POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Flemington POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Flemington POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Flemington POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Flemington POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Flemington POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Flemington POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to	Flemington POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable

	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.rsपो.org .		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	During this visit no record of IP production available. This mill in progress to produce IP CPO, as per plan will start on September 2021. Last OCP crop received by mill was on 24/7/2021 verified as per Monthly Crop Report.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Not applicable, this mill was on IP Module supply chain.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Last process of non-certified was on 24/7/2021, this mill already upgrade from MB module into IP module on 23/8/2021 and will be start produce IP CPO on Sept 2021 as per plan.	Complied
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a 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 4pt (1.4 mm or 0.06 inch). In on-pack 	Flemington POM is not use RSPO label in its product (CPO & PK). This is confirmed during document reviewed and interview with the mill workers.	Complied

	communications, the RSPO trademark can be printed anywhere on the pack.		
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>Flemington POM is not use RSPO label in its product (CPO & PK). This is confirmed during document reviewed and interview with the mill workers.</p>	<p>Complied</p>
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised on August 2020. They promote</p>	<p>Complied</p>

	<p>- Critical (Major) compliance -</p>	<p>the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. Policy on the Protection of HRDs FINAL.pdf (sime-darbyplantation.com).</p> <p>The policies were communicated to stakeholders during stakeholder meetings. For internal stakeholders, policies briefing was carried out as per below sessions:</p> <table border="1" data-bbox="1137 895 1926 1193"> <thead> <tr> <th>Estate/Mill</th> <th>Date of training/briefing</th> </tr> </thead> <tbody> <tr> <td>Flemington POM</td> <td>29/3/2021</td> </tr> <tr> <td>Flemington Estate</td> <td>21/4/2021</td> </tr> <tr> <td>Bagan Datoh Estate</td> <td>16/2/2021</td> </tr> <tr> <td>Sabak Bernam Estate</td> <td>27/4/2021</td> </tr> <tr> <td>Sg Samak Estate</td> <td>5/7/2021</td> </tr> </tbody> </table>	Estate/Mill	Date of training/briefing	Flemington POM	29/3/2021	Flemington Estate	21/4/2021	Bagan Datoh Estate	16/2/2021	Sabak Bernam Estate	27/4/2021	Sg Samak Estate	5/7/2021	
Estate/Mill	Date of training/briefing														
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Flemington Estate	21/4/2021														
Bagan Datoh Estate	16/2/2021														
Sabak Bernam Estate	27/4/2021														
Sg Samak Estate	5/7/2021														
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation prohibits any form of harassment in their operation as per the policies above. Interviewed with the workers confirmed that no harassment by the management.</p>	Complied												
<p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>															

4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing. Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue. The workers were briefed on the complaint mechanism during morning muster. Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Sighted the External Complaint Book have the agreed resolution within timeframe. There was no other major complaint other than housing maintenance issues. Some of the external related request and grievance can be found under indicator 1.1.3.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to</p>	<p>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties</p>	Complied

	<p>choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>The mill and estates' management have made contribution to the local communities based on the requests from stakeholders. Among good deeds and contributions to the stakeholders observed;</p> <p>i) Food stock supply to workers that undergone home quarantine by KKM .</p> <p>ii) <i>Kami Prihatin</i> Campaign (food and essential items distribution under Yayasan Sime Darby)</p> <p>iii) SJK (T) Ladang Strathmashie – help to upkeep school compound (grass cutting etc)</p>	<p>Complied</p>
<p>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.</p>			
<p>4.4.1</p>	<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>SOU4 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates has a list of all its land titles which have the information about names of lease, hectare, terms & conditions, lease period and grant</p>	<p>Complied</p>

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	<p>- Critical (Major) compliance -</p>	<p>numbers. Copies of the land titles were available at the estate's offices while the original were kept at headquarter</p>												
		<table border="1"> <thead> <tr> <th data-bbox="1120 432 1317 517">Estate</th> <th data-bbox="1317 432 1581 517">Land title</th> <th data-bbox="1581 432 1771 517">Land use type</th> <th data-bbox="1771 432 1937 517">Tenure</th> </tr> </thead> <tbody> <tr> <td data-bbox="1120 517 1317 1061"> <p>Bagan Datoh Estate</p> </td> <td data-bbox="1317 517 1581 1061"> <p>Sample :</p> <p>i) GRN 179143, lot 3720, Mukim Bagan Datuk, title area: 465.3892 ha</p> <p>ii) GRN 1513, lot 4020, Mukim Bagan Datuk, title area: 303.4126 ha</p> <p>iii) GRN 141480, lot 5132, Mukim Bagan Datuk, title area: 396.8 ha</p> <p>Total titles: 68 (3,929.777 ha)</p> </td> <td data-bbox="1581 517 1771 1061"> <p>Agriculture except for title no. (iii) – no category</p> </td> <td data-bbox="1771 517 1937 1061"> <p>Freehold</p> </td> </tr> <tr> <td data-bbox="1120 1061 1317 1383"> <p>Flemington Estate</p> </td> <td data-bbox="1317 1061 1581 1383"> <p>Sample :</p> <p>i) GRN 141481, lot 5138, Mukim Bagan Datuk, title area: 446.4 ha</p> <p>ii) GRN 105018, lot 5435, Mukim Teluk Bahru, title area: 260.6 ha</p> </td> <td data-bbox="1581 1061 1771 1383"> <p>Agriculture</p> </td> <td data-bbox="1771 1061 1937 1383"> <p>Freehold</p> </td> </tr> </tbody> </table>	Estate	Land title	Land use type	Tenure	<p>Bagan Datoh Estate</p>	<p>Sample :</p> <p>i) GRN 179143, lot 3720, Mukim Bagan Datuk, title area: 465.3892 ha</p> <p>ii) GRN 1513, lot 4020, Mukim Bagan Datuk, title area: 303.4126 ha</p> <p>iii) GRN 141480, lot 5132, Mukim Bagan Datuk, title area: 396.8 ha</p> <p>Total titles: 68 (3,929.777 ha)</p>	<p>Agriculture except for title no. (iii) – no category</p>	<p>Freehold</p>	<p>Flemington Estate</p>	<p>Sample :</p> <p>i) GRN 141481, lot 5138, Mukim Bagan Datuk, title area: 446.4 ha</p> <p>ii) GRN 105018, lot 5435, Mukim Teluk Bahru, title area: 260.6 ha</p>	<p>Agriculture</p>	<p>Freehold</p>
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			iii) GRN 53747, lot 4877, Mukim Hutan Melintang, title area: 460.5315 ha Total titles: 40 (1,906.84 ha)			
		Sabak Bernam Estate	Sample: i) GRN 29597, lot 1, Mukim Sabak, title area: 2,023.425 ha ii) GRN 45208, lot 2095, Mukim Sungai Panjang, title area: 504.0364 ha Total titles: 7 (2,511.3679 ha)	No category/no specific land use type	Freehold	
		Sg Samak Estate	Sample: i) GRN 47177, lot 4189, Mukim Hutan Melintang, title area: 1,137.1067 ha ii) PN 313725, lot 6875, Mukim Hutan Melintang, title area: 504.0364 ha Total titles: 11 (3,017.93 ha)	Agriculture	Freehold, PN 313725 leasehold for 60 years until 2 nd April 2025.	

4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.	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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.	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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust	Complied

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

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.</p> <p>- Critical (Major) compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
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.</p> <p>- Critical (Major) compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied

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

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

4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	SOP as per indicator 4.7.1.	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	There was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.3	<p>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)</p>	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied

	- Minor compliance -		
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
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 -	There were 8 outside crop producer @ OCP sending their FFB to Flemington POM in 2021. However, starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. The 1% MPOB FFB price for June 2021 was available for final June 2021 (Flemington POM: 40.34 (MPOB 1% *RM/%) . It was paste in front of the weighbridge office publicly.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Thus this indicator is not applicable.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Thus this indicator is not applicable.	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Thus this indicator is not applicable.	Not Applicable

	<p>repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>		
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>The third party FFB suppliers have signed on the agreement prior to deliver the FFB to the mill. Sampled of the agreement for 3 OCPs as below:</p> <ul style="list-style-type: none"> i. Agreement No.: Peniagaan Kelapa Sawit Hiap Thye, P/B/0421/FFB02624L dated 01/01/2021 and valid until 31/12/2021 ii. Agreement No.: Syarikat Teluk Baru Sdn Bhd P/C/1220/FFB02621L dated 01/01/2021 and valid until 31/12/2021 iii. Agreement No.: Sinaran Mewah, P/P/1220/FFB02618L dated 01/01/2021 and valid until 31/12/2021 <p>The payment term was outlined in the agreement where there will be two payments, advanced payment and final payment. The final payment will be made to the FFB suppliers on or before the 10th day of the following month. The pricing mechanism has detailed out in Third Schedule of the agreement. Interviewed with the FFB supplier confirmed that they understood the pricing mechanism and this mechanism has explained to them by the representative from OCP Department from HQ.</p>	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Sighted the payments for OCP as below:</p> <ul style="list-style-type: none"> • Sawit Teluk Baru Sdn Bhd : invoice no. P/AFVCH-200547, document date: 31/1/21, payment date:8/2/21 • Perniagaan Sinaran Mewah : invoice no. P/AFVCH-200550, document date: 31/1/21, payment date:8/2/21 	Complied

		<ul style="list-style-type: none"> Perniagaan Kelapa Sawit Hiap Thye : invoice no. P/AFVCH-200548, document date: 31/1/21, payment date:8/2/21 													
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Records of weighing equipment stamping was maintained on annual basis at visited operating units. Summary of stamping records as follows:</p> <table border="1"> <thead> <tr> <th>Weighing equipment</th> <th>Capacity</th> <th>Date of stamping, certificate no.</th> <th>Operating Unit</th> </tr> </thead> <tbody> <tr> <td>M/Toledo IND 780</td> <td>60,000 kg @ 60 tonne</td> <td>D 022454 stamped on 17/6/21</td> <td>Flemington POM</td> </tr> <tr> <td>M/Toledo IND 780</td> <td>50,000 kg @ 50 tonne</td> <td>D 022465 stamped on 17/6/21</td> <td></td> </tr> </tbody> </table>	Weighing equipment	Capacity	Date of stamping, certificate no.	Operating Unit	M/Toledo IND 780	60,000 kg @ 60 tonne	D 022454 stamped on 17/6/21	Flemington POM	M/Toledo IND 780	50,000 kg @ 50 tonne	D 022465 stamped on 17/6/21		Complied
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5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Thus this indicator is not applicable.</p>	Not Applicable												
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. Sime Darby Plantation Mill Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 01/04/2008) established to handle if there is any external complaint. Interviewed with the FFB supplier</p>	Complied												

		and he is able to show the understanding on the complaint mechanism	
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Thus this indicator is not applicable	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Thus this indicator is not applicable	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Thus this indicator is not applicable	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Thus this indicator is not applicable	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Thus this indicator is not applicable	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			

6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from https://www.simedarbyplantation.com/sustainability/human-rights-charter.</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>Interviewed with the workers comprises of different gender and nationalities as well as the parolees confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability. The worker can request for job transfer if they found they unfit for the job assigned to them.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has developed a Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability, and the leadership quality of the worker. The recruitment of foreign workers is through Human Resource Department in HQ based the regulation requirements.</p>	Complied

<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>Interviewed with the female employees in Flemington Palm Oil Mill and other visited estates confirmed that pregnancy testing is not conducted prior to work. They still will be able to offer for work if they are pregnant.</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.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in. For example, at Flemington Estate, kick-off briefing by HQ team was given on 29/6/21 to further explained on the new TOR implementation.</p> <p>Gender Committee were established by the mill and estates management and verified at each operating unit. Meetings to be conducted once every 2 months or whenever necessary according to the new TOR. Meetings conducted at respective units as below:</p> <ul style="list-style-type: none"> i) Flemington POM: 16/1/2021, 8/3/201 & 19/6/21. ii) Flemington Estate: 11/2/2021, 12/4/21, 29/6/21 iii) Bagan Datoh Estate: 16/1/21, 19/4/21, 23/7/2021 iv) Sg Samak Estate: 28/1/21, 28/4/21, 16/8/21 v) Sabak Bernam Estate: 16/1/2021, 15/4/21, 27/7/21 <p>There was no sexual harassment case reported so far at all OU.</p> <p>SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee</p>	<p>OFI</p>

		Handbook, First Edition 2014. In this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in. Conformance to the new TOR requirements related to programme such as meetings, engagement programme and (non-labour related) assessment/survey has yet to further verified in the assessment – OFI	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	There is no discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting. Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	All employees have signed employment contracts (for foreigners), and employment letters (for locals) Each document is dated and contains provisions related to duration of contract, job scope, place of work, roles and responsibilities of employers and employees, wages, allowances, working hours, mutual termination notice, holidays, paid annual leave, medical leave, other benefits, deductions, etc. These documents were prepared in Bahasa Malaysia, a language which is understood by all workers from Malaysia, Indonesia, India and Bangladesh.	Complied
6.2.2	(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	Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination,	Complied

	<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>salary deductions, maternity entitlement, etc. The terms are in compliance with Employment Act 1955.</p> <p>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Employment Act 1955. As at current status, there was none has crossed 80 hours of overtime. Verified the payslips, the payment and calculation of overt time well distributed.</p> <p>The overtime rate after 8 hours daily rated is: upkeeping</p> <ul style="list-style-type: none"> - Mon - Sat – daily rated / 8 hours x 1.5 - Sunday - daily rated / 8 hours x 2.0 - Public holiday – daily rated / 8 hours x 3.0 <p>The overtime rate after 8 hours piece rated is: harvesters</p> <ul style="list-style-type: none"> - Mon - Sat – flat rate - Sunday – flat rate x 2.0 - Public holiday – flat rate x 3.0 	
<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 review of punch cards, workers’ employment contracts and payslips, evidence was available that the estates were able to demonstrate compliance with Employment Act 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSSO, EPF, EIS) and non-statutory deductions (e.g. electricity bills, etc) in accordance with the relevant laws and Labour Office permits. Sighted permits and approvals as per the following:</p> <p><u>Flemington POM</u></p> <p>Sime Darby Plantation Sdn Bhd has obtained approval from <i>Jabatan Tenaga Kerja Semenanjung Malaysia</i> for the following:</p>	<p>Complied</p>

		<ul style="list-style-type: none"> i. Ref. No.: BHG. PU/9/129 JLD 3 (53) dated 06/07/2017 for deduction of wages for electricity bill. ii. Ref. No.: BHG. PU/9/134 JLD 9 (11) dated 27/03/2017 for overtime limit for 130 hours <p>Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay.</p> <p>Sighted sample of pay slips checked for employees in 3 different production trends (low, normal and peak production month) as per below:</p> <p><u>Flemington POM</u> (8 workers out of 98 workers sampled)</p> <p>Total of 8 worker’s payslips checked from out of 98 numbers of workers consist of full-time workers for the month of May, June and July 2021. Average daily wage @ ordinary rate of pay is more than Minimum Wages Order 2020 of RM46.15 per day. Law full deduction (SOCSO, EPF, EIS) is correctly made and appear in the pay slip. Based on the sample, total overtime hours have not exceeded 104 hours.</p> <p><u>Bagan Datoh Estate</u> (14 workers out of 291 workers sampled)</p> <p>Total of 14 worker’s payslips checked from out of 291 numbers of workers consist of full-time workers for the month of November 2020 (low), February 2020 (average/normal) and April 2021 (high). Average daily wage @ ordinary rate of pay is more than Minimum Wages Order 2020 of RM46.15 per day. Law full deduction (SOCSO, EPF, EIS) is correctly made and appear in the pay slip. Based on the sample, total overtime hours have not exceeded 104 hours</p> <p><u>Flemington Estate</u> (10 workers out of 168 workers sampled)</p>	
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		<p>Total of 10 worker’s payslips checked from out of 168 numbers of workers consist of full-time workers for the month of January 2021 (low), June 2021 (average/normal) and March 2021 (high). Average daily wage @ ordinary rate of pay is more than Minimum Wages Order 2020 of RM46.15 per day. Law full deduction (SOCSO, EPF, EIS) is correctly made and appear in the pay slip. Based on the sample, total overtime hours have not exceeded 104 hours <u>Sg Samak Estate</u> (14 workers out of 291 workers sampled)</p> <p>Total of 14 worker’s payslips checked from out of 291 numbers of workers consist of full-time workers for the month of November 2020 (low), February 2020 (average/normal) and April 2021 (high). Average daily wage @ ordinary rate of pay is more than Minimum Wages Order 2020 of RM46.15 per day. Law full deduction (SOCSO, EPF, EIS) is correctly made and appear in the pay slip. Based on the sample, total overtime hours have not exceeded 104 hours <u>Flemington Estate</u> (10 workers out of 168 workers sampled)</p> <p>Total of 10 worker’s payslips checked from out of 168 numbers of workers consist of full-time workers for the month of January 2021 (low), June 2021 (average/normal) and March 2021 (high). Average daily wage @ ordinary rate of pay is more than Minimum Wages Order 2020 of RM46.15 per day. Law full deduction (SOCSO, EPF, EIS) is correctly made and appear in the pay slip. Based on the sample, total overtime hours have not exceeded 104 hours</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the</p>	<p>The basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity and water were supplied by government and deducted from salary. Seen the budget for housing repairs, sanitation, garden upkeep and CAPEX & OPEX from all operating units.</p>	Complied

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	<p>upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Seen the record for weekly line site inspection done by Medical Assistant (estate) and QA (mill) in fortnightly basis as per the new Workers Minimum Housing and Amenities Regulation 2020. Inspection records checked:</p> <table border="1" data-bbox="1137 499 1928 842"> <thead> <tr> <th>Estate/Mill</th> <th>Date of inspection</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Flemington POM</td> <td>6/10/21 and 16/10/21</td> <td>Nil</td> </tr> <tr> <td>Flemington Estate</td> <td>6/10/21 and 24/9/21</td> <td>Nil</td> </tr> <tr> <td>Sg Samak Estate</td> <td>18/10/21 and 11/10/21</td> <td>Nil</td> </tr> <tr> <td>Bagan Datoh Estate</td> <td>7/10/21, 14/10/21</td> <td>Nil</td> </tr> </tbody> </table> <p>For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes).</p> <p>Fortnightly VMO (visiting medical officer) visit summarized as per below:</p> <p>22/8/21 & 8/9/21 – VMO Flemington POM</p> <p>30/9/21 & 14/10/21 – VMO Sg Samak Estate</p> <p>7/10/21 & 21/10/21 – VMO Bagan Datoh Estate</p>	Estate/Mill	Date of inspection	Remarks	Flemington POM	6/10/21 and 16/10/21	Nil	Flemington Estate	6/10/21 and 24/9/21	Nil	Sg Samak Estate	18/10/21 and 11/10/21	Nil	Bagan Datoh Estate	7/10/21, 14/10/21	Nil	
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6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There were sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient and affordable foods and goods. Price of goods were displayed at the sundry shops. Workers interview</p>	Complied															

		<p>confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town.</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: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC)</i></p>	<p>Sime Darby Plantation Berhad – Flemington POM has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. The payslip sighted in clause 6.2.1 showed that the salary received complied with the minimum wage order 2020 and the decent living wage set up by the group which is foreign worker is RM2092.66/worker and local RM1692.99/worker.</p> <p>Note: Until housing basket can be determine (work in progress-data type need to pull from various departments and further segregated), in the interim SDP will refer to CA amount of RM125.</p>	<p>Complied</p>

	<p><i>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 the core works are performed by permanent and full-time employees in SOU 4 Flemington Palm Oil Mill and supply bases. No contract worker was employed except for supporting work.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p>	Complied

		<ul style="list-style-type: none"> • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. • Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. • Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively. <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join union</p>	
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>NUPW Committee was established in Flemington Palm Oil Mill and the last meeting was conducted on 16/6/2021. Issues were raised during the meeting and recorded in the meeting minutes. Management plan was developed for the issues raised by the NUPW representatives and action has been taken accordingly. Interviewed with the NUPW representatives confirmed that the issues raised during the meeting were resolved. He informed that there is no any further pending issue reported during the time of audit. Sighted meeting minutes at other operating units as per below:</p> <p>Flemington Estate – 5/2/21 Sg Samak Estate – 5/7/21 Sabak Bernam Estate – 25/1/21 Bagan Datoh Estate – 18/2/21</p>	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>Interviewed with the NUPW representatives and the workers confirmed that the election of the representatives were elected freely by the workers without any interference of management.</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 Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. • Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. • Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. • Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities. • Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use. • Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. • Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of

Complied

		<p>maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.</p> <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.</p>	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liason & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict.</p>	Complied

		The policy was communicated to the workers conducted on 11/01/2021 in Bukit Puteri Oil Mill and 24-25/03/2021 in Bukit Puteri Estate.	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.</p> <p>The policies were communicated to workers on 11/01/2021 in Bukit Puteri Oil Mill. Gender Committee of Bukit Puteri Estate has conducted briefing to the female workers on 03/04/2021 related to the sexual harassment and reproductive rights. Seen the training attendance list. The workers have to answer quiz to ensure their understanding on the training.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Briefing of the new mother assessment was conducted during the Gender Committee meeting. This has made confirmed during interview and document review during site audit. Related request has been approved by the management. Noted outcome from the assessment as per the following:</p> <p>Flemington POM – 22/9/2021 (3 times break for breast pump)</p> <p>Bagan Datoh Estate -22/9/2021 (no request by the new mother. Baby is bottle fed.</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>Sime Darby Plantation has developed Gender Committee Handbook, First Edition for implementation framework and guidelines where grievance reporting procedure for gender was developed. Any cases must be reported to Social & Environment Projects Unit of the PSQM</p>	Complied

		<p>Department. Incident report template was established. Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Interviewed with the workers confirmed that no forced and trafficked labour in SOU4. The Indian workers informed that they did not pay any recruitment fee to agent as they employed directly by Sime Darby. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. They keep their passport at the Passport Locker near the Security Post. They can access to the passport freely. Overtimes was monitored by the company and the workers are giving freedom to choose to overtime and resign. There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed.</p> <p>If the workers in the mill who want to work for overtime, they will need to fill in the Overtime Details form. Those who worked on rest</p>	<p>Complied</p>

		day and public holiday is required to fill in the application form <i>Kerja/ Kerja lebih masa pada hari rehat & Kerja/ kerja lebih masa pada hari cuti am</i> . Approval from the Supervisor and Assistant is required.	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby’s Human Rights Charter revised 2020 and can be easily access via www.simedarbyplantation.com where they committed as below:</p> <ul style="list-style-type: none"> a) Providing equal opportunity b) Respecting freedom of association c) Eradicating any form of exploitation d) Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs e) Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. <p>All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow joining NUPW freely. No contract substitution has occurred through interviewed with the workers.</p>	Complied
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
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.</p>	<p>Sampling in Flemington estate, the management already appoint the manager (Mageswaran a/l Subramonie) as the Chairman of the JKPP for OSH committee in Flemington estate dated 1/1/2021.</p>	Complied

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	<p>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>Estate management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Manager. The latest OSH meeting was conducted on 25/6/2021.</p>														
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures were available and sighted at the Office and Master Ground. There is a formation of ERP Team & ERP for all the identified incidences (Evacuation, Evacuation – Confined Space, Fire Fighting & Spillage or Overflow). The ERP Team was appointed, and the organizational chart was displayed at the notice board together with the emergency contacts.</p> <p>The training have been conducted by estate as per sample below:-</p> <table border="1" data-bbox="1137 804 1899 1054"> <thead> <tr> <th>Operating Unit</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Sabak Bernam estate</td> <td>First aid training</td> <td>6/5/2021</td> </tr> <tr> <td>ERP training</td> <td>3/5/2021</td> </tr> <tr> <td rowspan="2">Sg Samak estate</td> <td>First aid training</td> <td>30/6/2021</td> </tr> <tr> <td>ERP Training</td> <td>30/6/2021</td> </tr> </tbody> </table>	Operating Unit	Training	Date	Sabak Bernam estate	First aid training	6/5/2021	ERP training	3/5/2021	Sg Samak estate	First aid training	30/6/2021	ERP Training	30/6/2021	<p>Complied</p>
Operating Unit	Training	Date														
Sabak Bernam estate	First aid training	6/5/2021														
	ERP training	3/5/2021														
Sg Samak estate	First aid training	30/6/2021														
	ERP Training	30/6/2021														
<p>6.7.3</p>	<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>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were provided by the management and worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated</p>	<p>Complied</p>													

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		<p>that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>																																							
<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. All estates have their own dispensary managed by a Medical Assistant. The dispensary provides medical care for workers and staffs for minor injuries and sickness free of charge. Major injuries or sickness are referred to the Private Clinics or Hospitals where the cost is borne by the management. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for all estate visited as below.</p> <table border="1" data-bbox="1137 783 1928 1364"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Number of Employees</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Flemington POM</td> <td>July 2021</td> <td>95</td> <td>4402.10</td> </tr> <tr> <td>Aug 2021</td> <td>98</td> <td>4359.10</td> </tr> <tr> <td>Sep 2021</td> <td>95</td> <td>4284.30</td> </tr> <tr> <td rowspan="2">Sungai Samak Estate</td> <td>July 2021</td> <td>214</td> <td>7912.80</td> </tr> <tr> <td>Aug 2021</td> <td>213</td> <td>7290.90</td> </tr> <tr> <td rowspan="3">Flemington Estate</td> <td>July 2021</td> <td>174</td> <td>5541.30</td> </tr> <tr> <td>Aug 2021</td> <td>169</td> <td>5423.50</td> </tr> <tr> <td>Sep 2021</td> <td>159</td> <td>5094.20</td> </tr> <tr> <td rowspan="2">Sabak Bernam Estate</td> <td>July 2021</td> <td>176</td> <td>5288.70</td> </tr> <tr> <td>Aug 2021</td> <td>173</td> <td>5142.90</td> </tr> </tbody> </table>	Operating Unit	Month	Total Number of Employees	Amount	Flemington POM	July 2021	95	4402.10	Aug 2021	98	4359.10	Sep 2021	95	4284.30	Sungai Samak Estate	July 2021	214	7912.80	Aug 2021	213	7290.90	Flemington Estate	July 2021	174	5541.30	Aug 2021	169	5423.50	Sep 2021	159	5094.20	Sabak Bernam Estate	July 2021	176	5288.70	Aug 2021	173	5142.90	<p>Complied</p>
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			Sep 2021	175	5397.00																
		Bagan Dato Estate	July 2021	302	9822.70																
			Aug 2021	290	8711.90																
			Sep 2021	278	8686.70																
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	The occupational injuries are recorded in JKPP 8 for incident happen in 2020 as per sampling below:-				Non-compliance															
		<table border="1"> <thead> <tr> <th>Operating unit</th> <th>Accident</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Sg Samak</td> <td>4</td> <td>13.16</td> </tr> <tr> <td>Sabak Bernam</td> <td>2</td> <td>8.72</td> </tr> <tr> <td>Flemington Mill</td> <td>1</td> <td>9.67</td> </tr> <tr> <td>Flemington estate</td> <td>1</td> <td>5.15</td> </tr> </tbody> </table>			Operating unit	Accident	LTA	Sg Samak	4	13.16	Sabak Bernam	2	8.72	Flemington Mill	1	9.67	Flemington estate	1	5.15		
Operating unit	Accident	LTA																			
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Flemington estate	1	5.15																			
Sighted at Sabak Bernam Estate, record of JKPP 8 (JKPP8/79060/2020) dated 25/1/2021 for accident report occurred on 10/9/2020 (7 days) was not tally with the Medical Certificate (AM 568694) issued for 6 days by medical practitioner. Compensation record (SOCSO) claimed for 6 days not 7 days as reported in JKPP8. Thus, a minor NC was raised.																					
Principle 7: Protect, conserve and enhance ecosystems and the environment																					
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																					
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	IPM Plans are stated in the Sime Darby EQMS Standard Operation Manual (SOM); Sub Section 5.4 Planning; Year 2020. Each estate has incorporated an IPM Plan and Programme for the year 2020 where they have identified the proposed IPM plans for the estate. Among the plans such as Continuous Establishment of Beneficial				Complied															

		Plants, Barn Owl Box Establishment, Bagworm Control and Awareness Program. Sighted at all the estates visited, extensive establishment of beneficial plants along main roads and collection roads. The estates continue to propagate beneficial plants and increase the beneficial plants are of coverage.	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	Species referenced in the Global Invasive Species Database and CABI.org are not used in the estates.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There is no use of fire for pest control in the estates.	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease. Some of recommended pesticides are: Immature planting (sample) i. General weeds : Glyphosate ii. Pennisetum polystachion : Metsulfuron Methyl iii. Stenochlaena palustris : Sodium chlorate Mature planting i. Grass weed and Asystasia : glyphosate & 2,4-D amine The selection is also evaluated by the agronomist during his visit to the estate	Complied

7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estates.</p> <p>Sighted the sampled records of pesticides usage per ha (a.i/ha) at estate visited as follows:</p> <table border="1" data-bbox="1137 547 1924 794"> <thead> <tr> <th>Estate</th> <th>Jul 2021</th> <th>Aug 2021</th> <th>Sep 2021</th> </tr> </thead> <tbody> <tr> <td>Flemington Estate</td> <td>0.977</td> <td>0.574</td> <td>0.532</td> </tr> <tr> <td>Sungai Samak Estate</td> <td>0.500</td> <td>0.300</td> <td>0.060</td> </tr> <tr> <td>Sabak Bernam Estate</td> <td>0.067</td> <td>0.058</td> <td>0.128</td> </tr> <tr> <td>Bagan Datoh Estate</td> <td>0.410</td> <td>0.420</td> <td>0.310</td> </tr> </tbody> </table>	Estate	Jul 2021	Aug 2021	Sep 2021	Flemington Estate	0.977	0.574	0.532	Sungai Samak Estate	0.500	0.300	0.060	Sabak Bernam Estate	0.067	0.058	0.128	Bagan Datoh Estate	0.410	0.420	0.310	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 estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</p>	Complied																				
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no prophylactic use of pesticides in all estates visited.</p>	Complied																				
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated</p>	<p>As per verification on chemical register, sampling in Bagan Datoh estate found chemical class I in estate been used the chemical register showed that only class III & IV chemicals were used at all the estates visited. During the site visit to the chemical store it was justified that there were only class II, III and IV chemicals being</p>	Complied																				

	<p>by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>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>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 were 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. Sampled the training conducted for pesticide handlers as below: -</p> <table border="1" data-bbox="1137 1034 1921 1361"> <thead> <tr> <th>Estate</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Bagan Datoh estate</td> <td>Spraying and chemical handling training</td> <td>3/6/2021</td> </tr> <tr> <td>Flemington estate</td> <td>Chemical handling application training</td> <td>14/4/2021</td> </tr> <tr> <td>Sg Samak estate</td> <td>Spraying and chemical handling</td> <td>16/6/2020</td> </tr> </tbody> </table>	Estate	Training	Date	Bagan Datoh estate	Spraying and chemical handling training	3/6/2021	Flemington estate	Chemical handling application training	14/4/2021	Sg Samak estate	Spraying and chemical handling	16/6/2020	<p>Complied</p>
Estate	Training	Date													
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Flemington estate	Chemical handling application training	14/4/2021													
Sg Samak estate	Spraying and chemical handling	16/6/2020													

7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of 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 available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Pesticide containers were found to be recycled and used as premix containers. The access containers were all triple rinsed and punctured and stored at the designated store before they are disposed to the licensed recycle waste collector.</p> <p>Sighted the latest consignment note for disposal of triple rinsed and punctured chemical drums as below: -</p> <p>a) Sabak Bernam Estate – Disposal of 295 Chemical Containers and 13kg Chemical Bottles (Ally, Basta, Garlon) on 23.06.2020 to SS Setia Teknologi Enterprise.</p> <p>b) Bagan Datoh Estate – Disposal of 1850 Chemical Containers and 1270 Chemical Bottles (Ally, Basta, Garlon) on 25.06.2021 to SS Setia Teknologi Enterprise.</p> <p>Sungei Samak Estate – Disposal of 259 Chemical Containers and 300kg Chemical Bottles (Ally, Basta, Garlon) on 09.09.2021 to SS Setia Teknologi Enterprise.</p>	Complied

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7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	No aerial spraying for pesticide were done in all the estates.	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Medical Surveillance for sprayers and pesticide operators were conducted in compliance with the CHRA recommendations in the sampled estates. All estate has conducted annual medical surveillance to their chemical handlers that have been exposed to hazardous chemicals. Sampled the latest medical surveillance records for the estates below.</p> <p><u>Sungai Samak Estate</u></p> <p>Chemical Risks in regard to Manganese and Cholinesterase were examined during the medical surveillance conducted for 7 workers on 30/12/2020, identified to be exposed to hazardous chemicals and fumes, at Klinik K.S. Tan. The results indicated that all workers were fit to work.</p> <p><u>Sabak Bernam Estate</u></p> <p>Medical Surveillance was conducted for a total of 21 workers, namely sprayers, workshop attendants and mandores on 15/04/2021 at Sabak Dispensary. All workers were declared fit to work.</p> <p><u>Bagan Datoh Estate</u></p> <p>Medical Surveillance was conducted on 05/08/2021 for a total of 21 workers identified to be exposed to hazardous chemicals. They are mainly sprayers, premixers and store clerk. The medical surveillance conducted at Klinik & Surgeri Lee deemed all workers fit to continue with their respective duties.</p>	Complied

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 visited has 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>Interview with female workers during the site visit showed awareness that they are prohibited from chemical related works during pregnancy and breastfeeding.</p>	Complied
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>The management identified the waste products and source pollution generated in the estates and mill. Sampling in Bagan datoh estate, the waste are categorized as Scheduled waste (SW 404, 305, 102, 410 etc.), Domestic waste and industrial waste. The record of implementation verified on scheduled waste implementation; the inventory was available ref no: AS(B)A11/123/000/183 for July 2021. The disposal of scheduled waste (consignment note) sample on SW 305 and 404, the consignment note was available.</p> <p>Another sampling was on Flemington estate, the inventory record was scheduled waste was available file ref: A11/123/000/016 for June 2021 July 2021. There are 4 type of SW in Flemington estate as per inventory, the record available for SW 404, 305, 409 and 410. Latest disposal was on 16/8/2021 as per consignment note ref no: 2021081612EQIHXS this was record disposal for SW 410 at Pentas Flora (Ipoh) Sdn Bhd.</p>	Complied
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>OUs sampled has established management Plan base on the identification and source of pollutions and the documented in Waste management Plan FY 2021. Waste disposal was done as per waste management plan established. The estate has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by</p>	Non-compliance

		<p>DOE authorized waste disposal contractor. Sighted the implementation of the management plan as follows:</p> <p><u>Sq Samak Estate</u> Inventory record of SW was available as per verify A11/122/000/001 dated August 2021 Consignment note SW 404 dated 1/3/2021 disposed at Edgenta Mediserve Sdn Bhd. Consignment note SW 305 (202110181767Z9IL) dated 18/10/2021 disposed at Primochem Sdn Bhd. For SW 305 and SW 102 was collected by the Sime Darby Industrial after services by them, the SDI already have permission from DOE as per letter AS(BB)91/110/619/161 dated 6/9/2011.</p> <p><u>Bagan Datoh Estate</u> Inventory record of AS(B)A11/123/000/183 for September 2021 Empty container disposed at SS Setia Technology Enterprise (1975) dated 25/6/2021 SW 404 (2021101417MGRZS) dated 14/10/2021 with total 0.0014mt For others SW such as SW 305, 306, 401, and 101 as per letter extension for 2 year until 28/2/2022 from DOE referred AS(B) A11/123/000/183(7) dated 24/5/2021. During site visit at the Main Division of the estate, used oil based paint containers, 200L Oil containers, lubricant containers, used chemical pumps and used 20L chemical container which are categorized as scheduled waste were sighted to be stored at the Scrap Yard.</p>	
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		<p>The waste were not stored in the designated scheduled waste store with no waste information, date of generation and not properly transferred into closed and durable containers that are able to prevent spillage or leakage onto the environment as per SDP Sustainability and Quality Management (PSQM); Scheduled Waste (Hazardous Waste) Management; SD/SDP/PSQM(ESH)/203-EN1 dated 26 Feb 2015; 6.4.1, which states OU shall ensure that all waste generated are properly transferred into closed container which are durable and able to prevent spillage or leakage of the scheduled waste onto the environment.</p> <p>Furthermore, interview with the sampled workers involved in generating scheduled waste, indicated that they were unaware on the procedures of schedule waste storage in the estate thus Major NC been raise dur to repetitive NC from previous year.</p>	
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 evidence of fire used for waste disposal in all estates visited. Domestic waste was collected 2 – 3 time a week and stored in designated dumpsite (BIN) before disposed at Municipal Landfill. Sighted the payment bill from Tiong Weei Enterprise to Alam Avani Sdn Bhd (Majlis Perbandaran Teluk Intan) for domestic waste disposal no. 632557 dated 21/9/2021.</p>	Complied
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</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</p>	Complied

		b) EQMS chapter B14 – Manuring c) ARM Section 8 – Manuring									
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	<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. The leaf analysis and soil analysis report were made available for review. Noted the analysis report for estate visited as follows:</p> <p><u>Sabak Bernam Estate</u></p> <p>Latest soil sampling analysis was carried out on 20/5/2020. Refer report SABAK BERNAM ESTATE2020/21 AGRONOMIC & FERTILISER RECOMMENDATIONS REPORT –OIL PALM. The data been monitored to ensure soil fertility and plant health and to provide the fertiliser recommendation.</p> <p><u>Sg Samak Estate</u></p> <p>Latest soil sampling analysis was carried out on 28/7/2021. Referreport LDG SG SAMAK 2021/22 AGRONOMIC & FERTILISER RECOMMENDATIONS REPORT – OIL PALM. The data been monitored to ensure soil fertility and plant health and to provide the fertiliser recommendation.</p>	Complied								
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	<p>The record of EFB application was available at Bagan datoh, Flemington estate and Sg Samak estate as per below detail;-</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Month</th> <th>Field</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td>Bagan datuh</td> <td>October 2019</td> <td>99M</td> <td>190.31</td> </tr> </tbody> </table>	Estate	Month	Field	Mt	Bagan datuh	October 2019	99M	190.31	Complied
Estate	Month	Field	Mt								
Bagan datuh	October 2019	99M	190.31								

		Flemington estate	July 2021	011A	238.5	
		Sg Samak	July 2021	02M1	25.22	
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p>Fertilizer application program is based on the recommendation by Agronomist and documented in Agronomic and Fertilizer recommendation Report.</p> <p><u>Sg Samak Estate.</u> The estate maintains the records of manuring application as per recommendation by the agronomist. Observed application records as per agronomist recommendation: Month program: May 2021 Field: 2016B Ha program: 69.53 ha Type: AC Rate/palm: 2 kg/palm Date applied: 26/5/2021 Ha applied: 69.53</p> <p><u>Sabak Bernam Estate</u> Observed application records as per agronomist recommendation: Month program: June 2021 Field: 2020D Ha program: 50.88 ha Type: CCM65 Rate/palm: 1.5 kg/palm</p>				Complied

		Date applied: 25/6/2021 Ha applied: 50.88											
Criterion 7.5: Practices minimise and control erosion and degradation of soils.													
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series map were available for all estates visited prepared by the AAT-Precision Agriculture Unit. There were 258.40 ha of peat soils identified in the estate as per Soil Series Map issued by the AAT – Precision Agriculture Unit dated March 2019. No other soil categorised as problematic or fragile soil.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Soil series</th> </tr> </thead> <tbody> <tr> <td>Bagan Datoh</td> <td>Selangor, Jawa, Bernam, Kangkong, Sedu, Briah, Acid Phase of Selangor series, Tongkang</td> </tr> <tr> <td>Sabak Bernam</td> <td>Bernam, Briah, Selangor, Unclassified</td> </tr> <tr> <td>Sg. Samak</td> <td>Selangor, Briah, Peat</td> </tr> <tr> <td>Flemington</td> <td>Briah, Selangor, Jawa, Bernam</td> </tr> </tbody> </table>	Estate	Soil series	Bagan Datoh	Selangor, Jawa, Bernam, Kangkong, Sedu, Briah, Acid Phase of Selangor series, Tongkang	Sabak Bernam	Bernam, Briah, Selangor, Unclassified	Sg. Samak	Selangor, Briah, Peat	Flemington	Briah, Selangor, Jawa, Bernam	Complied
Estate	Soil series												
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Sabak Bernam	Bernam, Briah, Selangor, Unclassified												
Sg. Samak	Selangor, Briah, Peat												
Flemington	Briah, Selangor, Jawa, Bernam												
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>The replanting and operations in the estates are guided by the document, Responsible Agriculture Charter; revised 2020; 3.0 Commitments; 3.1 Protect and conserve biodiversity and ecosystem; 3.1.2 <i>Management of erosion by protection of steep slopes and river reserves within our operations and promote restoration programs.</i> All estates visited have slopes maps to indicate the gradient of the estate areas. Flemington Certification Unit do not have area of slopes above 25 degrees with the estates.</p>	Complied										
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>There is no new planting at all Flemington Certification Unit estates.</p>	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	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series map were available for all estates visited prepared by the AAT-Precision Agriculture Unit. No fragile soils identified in allestates in SOU 4.</p> <p>As sighted in estates document record, the estates have taken into account the land terrain, drainage and road systems in planning the replanting.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Among the estates under Flemington Certification Unit, it was identified that Sungai Samak Estate had Peat Soil within the vicinity, planted with Oil Palm. The management of the area is done under the guidance of the Sime Darby Plantation; Standard Operating Procedure; Section B15; Water Management; Version: 1; Year: 2008; Issue Date: 01/11/2008. During the site visit the at the peat areas in the estate, it was identified that the estates have implemented piezometers and peat subsidence to manage and monitor the area accordingly.</p>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Soil Analysis were conducted by Sime Darby Research Sdn Bhd. Every 5 years which guides the planning of all operations in the estate including manuring, replanting, drainage system and infrastructures. Topographic maps including terrain maps were also available as a guidance for the estates. Soil Analysis Reports were available at the sampled estates as below:</p> <ol style="list-style-type: none"> 1. Sungai Samak Estate <ul style="list-style-type: none"> - Soil Analysis Test Report; Test Report Number: S75/2018; Date Issued: 12/10/2018. 2. Sabak Bernam Estate – 	Complied

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		<ul style="list-style-type: none"> - Soil Analysis Test Report; Test Report Number: S5/2019; Date Issued: 02/01/2019. - Soil Series Map was available, prepared by R&D Precision Agriculture Unit (NHS) on 20/02/2018. <p>3. Bagan Dato Estate –</p> <ul style="list-style-type: none"> - Soil Series Map was available, prepared by R&D Precision Agriculture Unit (NHR) on 09/09/2018. - Soil Analysis Test Report; Test Report Number: S64/2018; Date Issued: 20/08/2018. 	
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	There were 258.40 ha of peat soils identified in Sg. Samak Estate as per Soil Series Map issued by the AAT – Precision Agriculture Unit dated March 2019. No other soil categorized as problematic or fragile soil.	Complied
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	Sime Darby Plantation Berhad has conducted peat soil verification at Sg. Samak Estate on 119 – 22/2/2019 and documented in Peat Soil Verification at Sg. Samak Estate for RSPO Compliance dated 1/4/2019. The verification was conducted by 2 agronomist from Plantation Research and Advisory. Sime Darby Plantation Berhad has inventoried and documented all the peat area 2019 Sime Darby Plantation Berhad RSPO Peat Inventory R1. The latest submission to RSPO Secretariat has been done on 21/4/2020. As per report, total area planted on peat in Sg. Samak Estate recorded at 258.40 ha.	Complied
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	Sg. Samak Estate have 258.40 ha of peat area in Yiew Lian Division. The estate has established the Water Management Plan for Peat Area. The management plan was reviewed on annually basis.	Complied

7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>Management strategy for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils) is based on the established ARM, section 10: Water Management In Coastal and Peat Plantings. 2 management strategies; optimal water level monitoring and flushing of acid rain water. Verified management plan for 2020 at Sungai Samak Estate as per criteria 7.7.3. The latest water table was on 29/7/2021, as per monitoring record they maintain water level at 40 – 60 cm: Sighted record monitoring the water measurement point at 14A and 02D1.</p>	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. 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>As per latest review on Long Range Replanting Program, the peat area at 116.57 ha were scheduled to be replanted on 2022. The drainability assessment have been conducted on 9 July 2021, and result showed that the area can be replant.</p>	Complied
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -</p>	<p>No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.</p>	Not Applicable

7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.</p>	Not Applicable								
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.											
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>The mill has established Water Management Plan and reviewed on annually basis. The Plan focusing on management of waste water, reducing fresh water usage in the mill, contingency plan during water shortage.</p> <p>The estates sampled has established Water Management Plan 2020. The management plan stated the water source, areas of concern, Monitoring, contingency plan, person responsible and time frame. The areas of concern focusing on water shortage/dry spell, severe water pollution, contamination of surface and ground water, reduce water usage in chemical activity, excess water in field and management of wastewater. Noted during the document review in all OU’s sampled, access to clean water is adequately provided to workers for household consumption. Water supply is by government @ SYABAS and LAP except for Sg. Samak Estate who have their own water treatment plant and as per license they must conduct the water analysis 3 month once. Latest water consumption result for Sg Samak estate as per below:-</p> <table border="1" data-bbox="1137 1310 1935 1390"> <thead> <tr> <th data-bbox="1137 1310 1335 1353">Estate</th> <th data-bbox="1341 1310 1529 1390">Month/report no</th> <th data-bbox="1536 1310 1727 1353">Total coliform</th> <th data-bbox="1733 1310 1935 1353">E.Coli</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estate	Month/report no	Total coliform	E.Coli					Complied
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		<table border="1"> <tr> <td>Sg Samak</td> <td>19/11/2020 (ML48/2021)</td> <td>ND</td> <td>ND</td> </tr> <tr> <td></td> <td>3/3/2021 (ML260/2021)</td> <td>ND</td> <td>ND</td> </tr> </table>	Sg Samak	19/11/2020 (ML48/2021)	ND	ND		3/3/2021 (ML260/2021)	ND	ND						
Sg Samak	19/11/2020 (ML48/2021)	ND	ND													
	3/3/2021 (ML260/2021)	ND	ND													
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>This water analysis was conducted by Sime Darby Research Sdn Bhd.</p> <p>Management of riparian zone is guided by River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). However the training for estate workers and mill been using the new that in line with with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). The widths of the buffer zones are guided by the following measurements:</p> <table border="1"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Water analysis was done for Sg Chawang and Sg Erong been done quarterly by estate, latest record was on 8/9/2021 referred test report PL431/2021. From result no chemical detected.</p>	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters		Complied
River width	Buffer zone															
> 40 meters	50 meters															
20 to 40 meters	40 meters															
10 to 20 meters	20 meters															
5 to 10 meters	10 meters															
< 5 meters	5 meters															
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p>	<p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and</p>		Complied												

	<p>- Minor compliance -</p>	<p>quarterly report was submitted to DOE accordingly. Sighted the Quarterly Return Form to DOE FY 2020 as follows:</p> <table border="1" data-bbox="1137 434 1928 635"> <thead> <tr> <th>Month</th> <th>BOD</th> </tr> </thead> <tbody> <tr> <td>April 2021</td> <td>67</td> </tr> <tr> <td>May 2021</td> <td>74</td> </tr> <tr> <td>June 2021</td> <td>97</td> </tr> </tbody> </table>	Month	BOD	April 2021	67	May 2021	74	June 2021	97	
Month	BOD										
April 2021	67										
May 2021	74										
June 2021	97										
<p>7.8.4</p>	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>The mill monitors the water consumption/FFB on monthly basis. sighted the records FY 2021 todate in mill was 106,815 liter and as per FFB process was 0.96 m3/FFB mt.</p>	<p>Complied</p>								
<p>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>											
<p>7.9.1</p>	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -</p>	<p>Plan to reduce the usage of the non-renewable energy has been established by using renewable energy such as shell and kernel as fuel for boiler to reduce the usage of diesel. The mill monitored the consumption of diesel usage on monthly basis. The data monitoring was available for review at the mill and documented in the PalmGHG report. Renewable energy used is from biofuel, shell and EFB/fibre for boiler start-up. Sighted the sampled records of renewable energy usage for FY 2020 as follows:</p> <table border="1" data-bbox="1137 1248 1928 1347"> <thead> <tr> <th></th> <th>Shell</th> <th>Fibre</th> </tr> </thead> <tbody> <tr> <td>Total</td> <td>10,453.42</td> <td>25,088.22</td> </tr> </tbody> </table>		Shell	Fibre	Total	10,453.42	25,088.22	<p>Complied</p>		
	Shell	Fibre									
Total	10,453.42	25,088.22									

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>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct. The data that been monitor of the significant pollutants to water, gaseous emissions to air and contamination on land are in place.</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>	<p>No new development within Flemington POM Certification Unit since 2014.</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Significant pollutants identification and plans are documented under Pollution Prevention Plan for period of January to December 2020. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p> <p>Sighted the sampled implementation of the management plan as follows:</p> <p>1. The mill conducted Stack sampling as per requirement stated in the compliance schedule for DOE license and contradiction license. Sighted the sample stack sampling as follows:</p> <p>Q1 for FY 2021 Report no: L-PG-AC2103CSD-0544 Monitoring date: 30/3/2021 Result: 120.9 at 12% CO₂, higher than permissible limit at 150 mg/m³.</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>There was no land preparation of existence or new planting in SOU 210 and Estate by burning ever since SDB practiced zero burning as per the policy in:</p> <p>a) EQMS-SOP-SectionB2 - Under felling/clearing & land preparation</p> <p>b) Carbon Policy</p> <p>SDP has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for the OP cultivation.</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>Fire prevention and control measures has been established based on Sime Darby Plantation Berhad Zero Burning Policy and Fire Prevention and Control Measures by GSQM. The established measures include zero burning replanting technique, water management and peat area (if applicable), fire prevention and control, fire suppression and daily hot spots monitoring. Hot spot alert monitoring dashboard can be found via this link;</p> <p>http://www.simedarbyplantation.com/sustainability/hotspotdashboard/. The above measures are developed based on risk area @ peat soil area.</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>Engagement with adjacent stakeholders was done during stakeholder meeting conducted at each operating unit. The latest was implementation was using Buletin to stakeholder, as per verification record on 17/6/2021 SOU 4 give bulletin to stakeholder including Kampung Tebing Rabak, Kampung Sg Dulang Dalam, KG Bunga Raya, and others. In the the Buletin already included on fire prevention and control measures and others matter.</p>	Complied

Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and land clearing since 15 November 2018.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>The reassessment on the HCV area in SOU 4 has been conducted on 22 – 23/6/2020 and documented in Addendum to High conservation value, Final Report for Strategic Operating Unit 4, ver. 2.0 dated July 2020. Only HCV 4 identified during the reassessment conducted in the group estate in SOU 4 with total area of 17.94 ha. Estates visited established HCV management plan base on the HCV assessment conducted. Among the management plan established as follows:</p> <ul style="list-style-type: none"> • River buffer zone monitoring • HCV area monitoring • Continue provide training to enhance awareness among workers <p>Latest monitoring been done by estate as per sampling in Bagan datoh estate dated 26/6/2021 and Flemington estate was on 9/6/2021.</p>	Complied
7.12.3	<p><i>Indicator is not applicable in Malaysia context</i></p>		Complied
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,</p>	<p>The reassessment on the HCV area in SOU 4 has been conducted on 22 – 23/6/2020 and documented in Addendum to High conservation value, Final Report for Strategic Operating Unit 4, ver.</p>	Complied

	<p>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>2.0 dated July 2020. Only HCV 4 identified during the reassessment conducted in the group estate in SOU 4 with total area of 17.94 ha. The management plan for HCVA was available at each sampling estate, this plan including to give Education and awareness for workers, Monitoring of water sampling results, etc. Estate visited continue to monitor the HCV area. The issue monitored include of encroachment/Sign of trespassing, wildlife issues/conflicts/sightings, pollution/erosion issue and others.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>No HCV with existing rights of local communities was identified that needs to be set aside.</p>	Complied
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>No RTE species identified in the estate visited as per Addendum to High conservation value, Final Report for Strategic Operating Unit4, ver. 2.0 dated July 2020. The estates management continue to promote awareness on HCV/RTE to the workers during morning briefing and training. Sighted at several strategic places in the estates visited such as office compound, muster ground, housing area and HCV area, signage on prohibition of capture, harm, collect or kill RTE species are erected.</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>No RTE species identified in the estate visited as per Addendum to High conservation value, Final Report for Strategic Operating Unit 4, ver. 2.0 dated July 2020. The monitoring was done monthly by sampling estate.</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</p>	<p>No new planting and land clearing since 15 November 2018.</p>	Complied

	November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -		
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Appendix B: GHG Reporting Executive Summary

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

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

The summary of the Net GHG emitted in **2020** for **Flemington POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	9.27
PK	9.27

Extraction	%
OER	20.21
KER	4.89

Production	t/yr
FFB Process	150,655.28
CPO Produced	42,283.84
PK Produced	10,239.2

Land Use	Ha
OP Planted Area	21,420.40
OP Planted on peat	258.40
Conservation (forested)	0
Conservation (non-forested)	0
Total	21,678.8

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	85,766.07	0.57	110,897.26	7.75	0	0	196,663.32	8.32
CO ₂ Emission from fertilizer	7,080.73	0.05	9,799.87	0.68	0	0	16,880.60	0.73
NO ₂ Emission	6,016.96	0.04	5,885.26	0.41	0	0	11,902.22	0.44
Fuel Consumption	920.55	0.01	1,162.36	0.08	0	0	2,082.91	0.09
Peat Oxidation	12,431.83	0.08	0	0	0	0	12,431.83	9.58
Sink								
Crop Sequestration	- 80,488.16	-0.53	- 105,115.91	-7.35	0	0	-185,604.07	-7.88
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	31,727.97	0.21	22,628.83	1.58	432,350.93	0	486,707.73	0.33

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0	0
Fuel Consumption	44.05	0
Grid Electricity Utilization	193.97	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	238.02	0

Summary of Kernel Crusher Emission and Credit (if applicable)

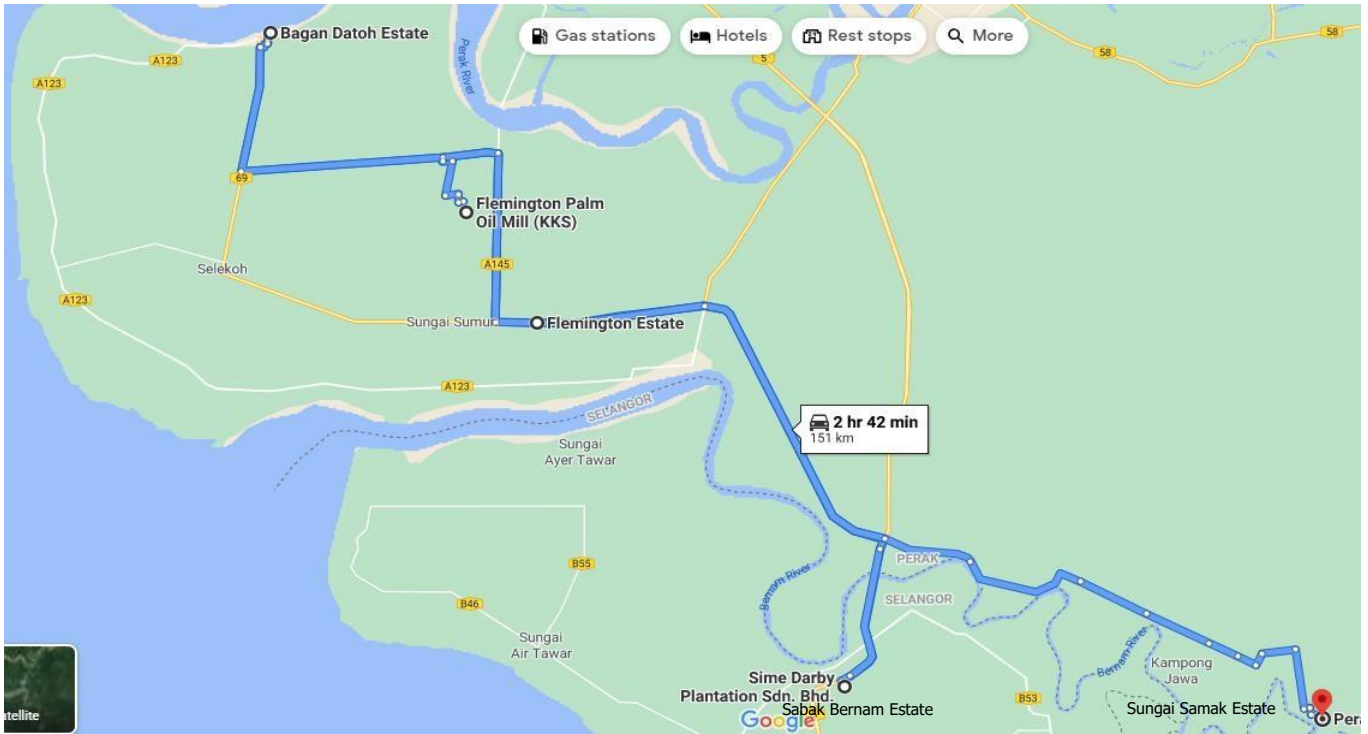
Emissions	tCO ₂ e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

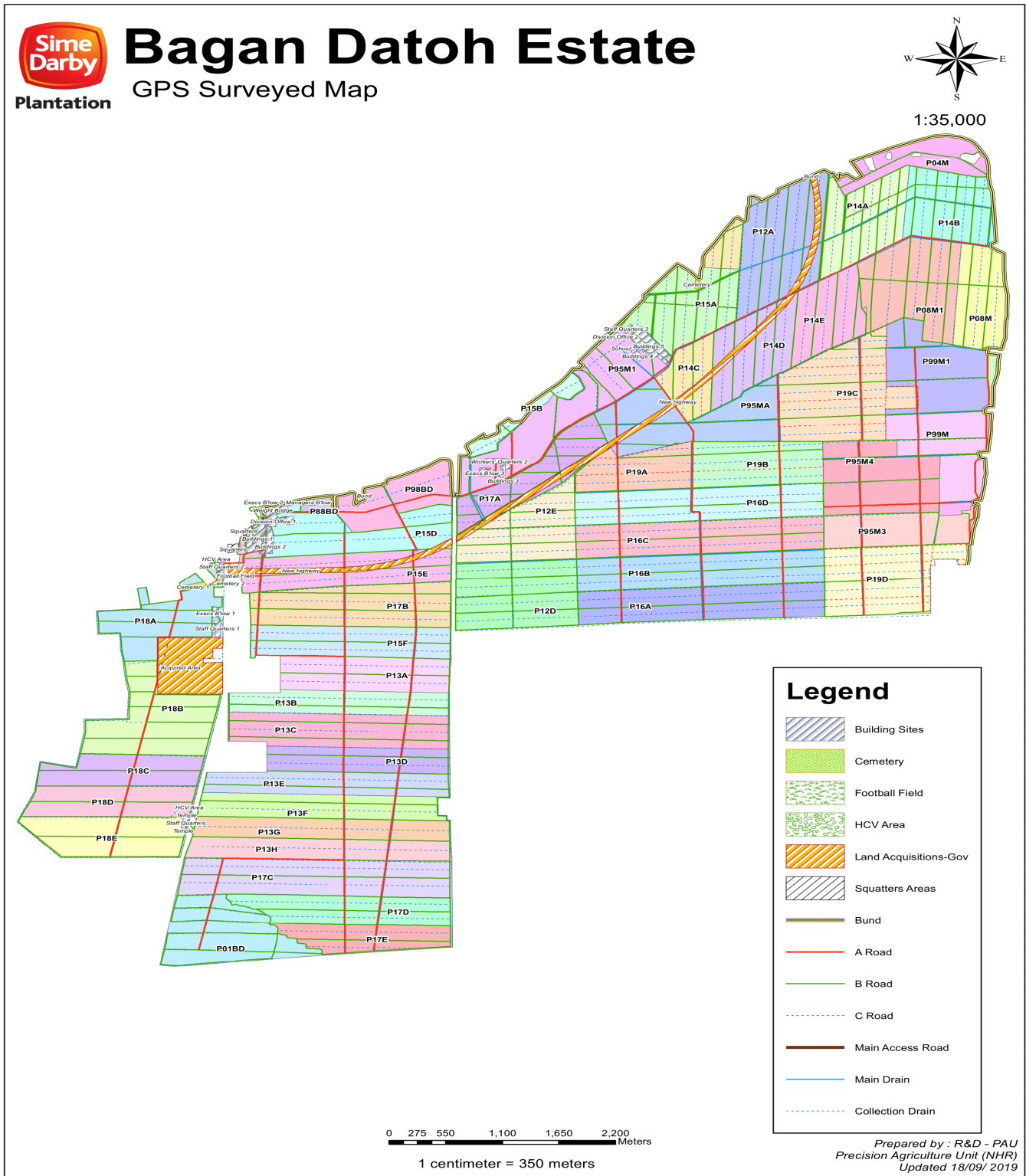
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	2
Divert to anaerobic diversion (%)	98

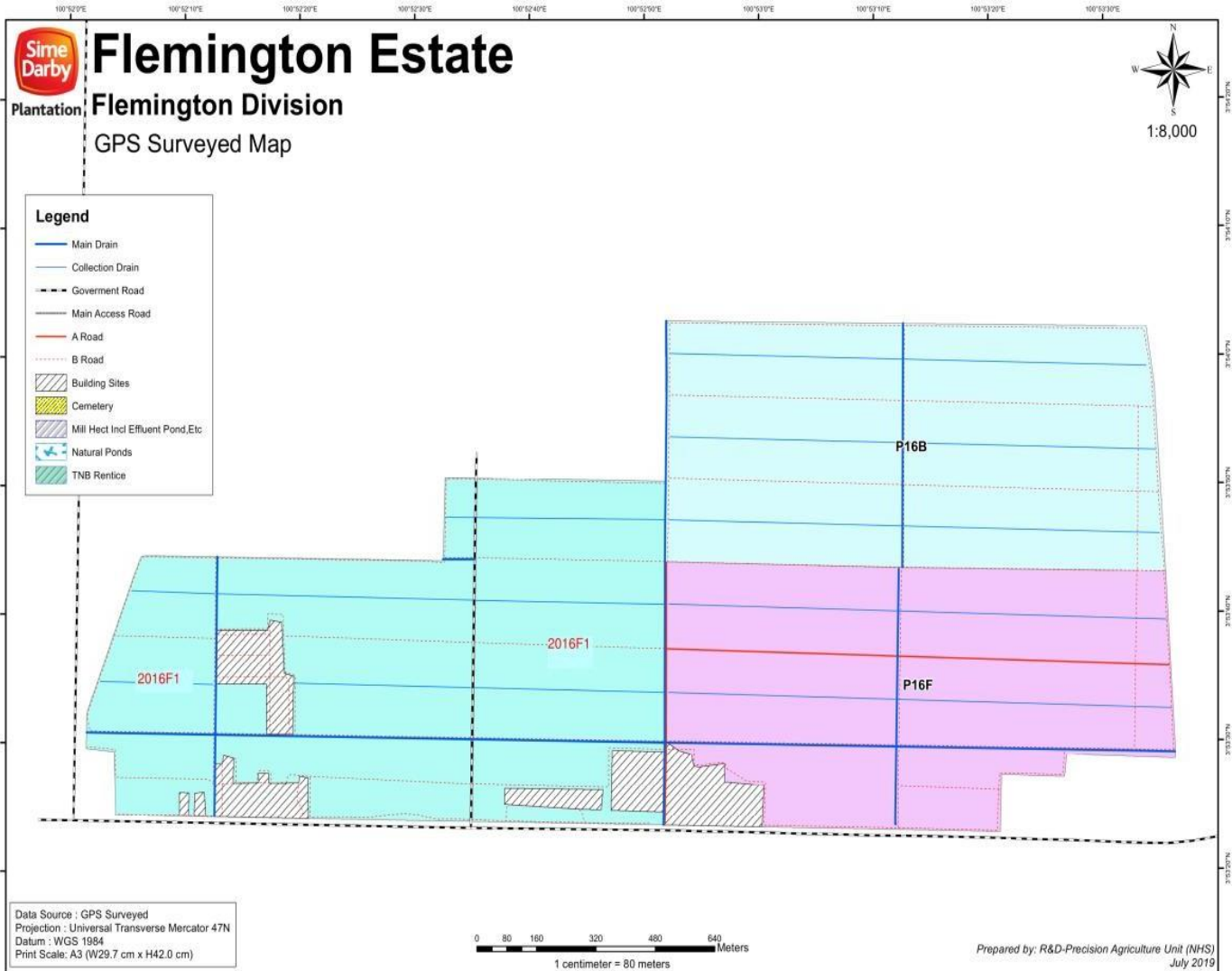
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

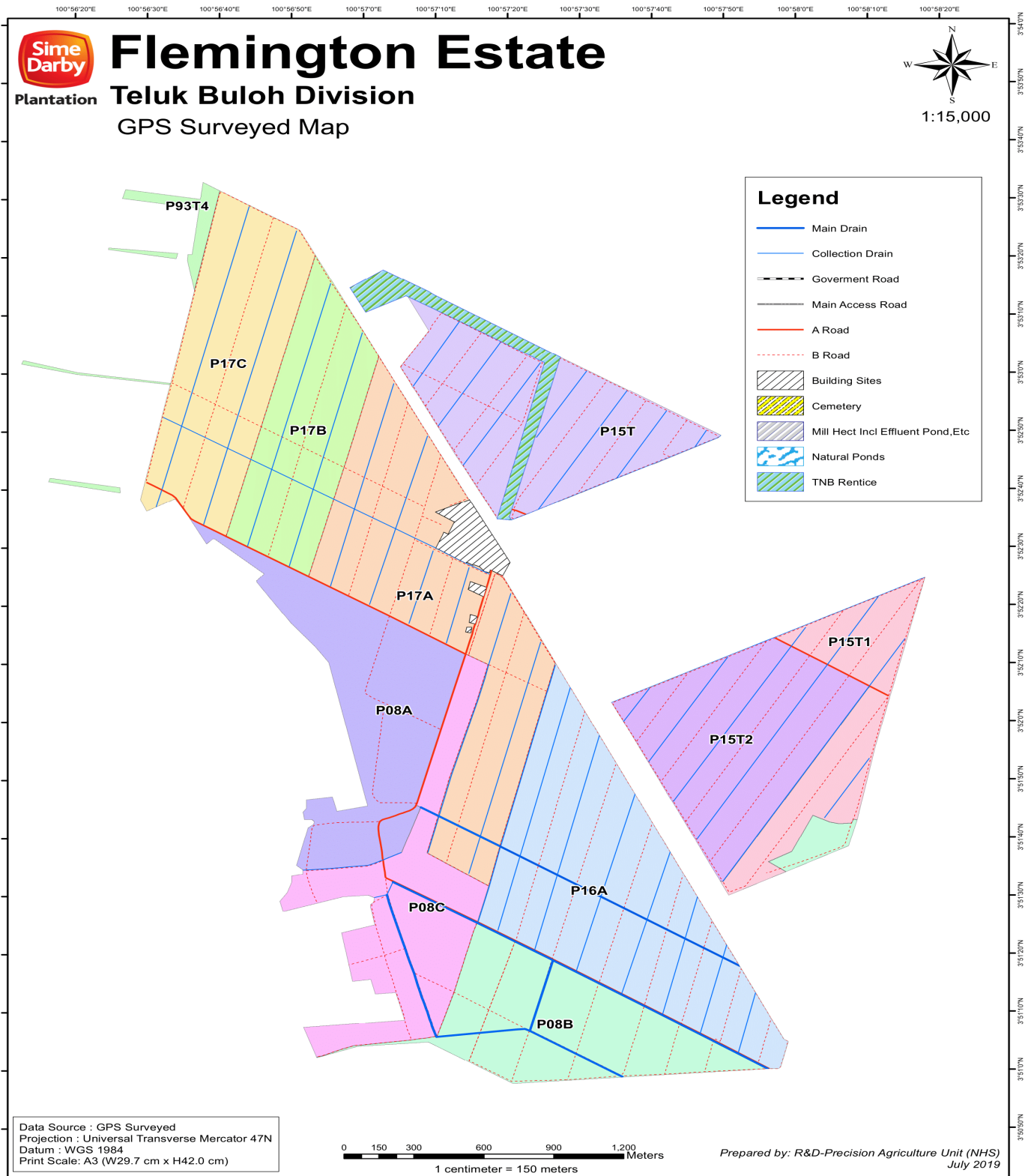
Appendix C: Location Map of Certification Unit and Supply bases

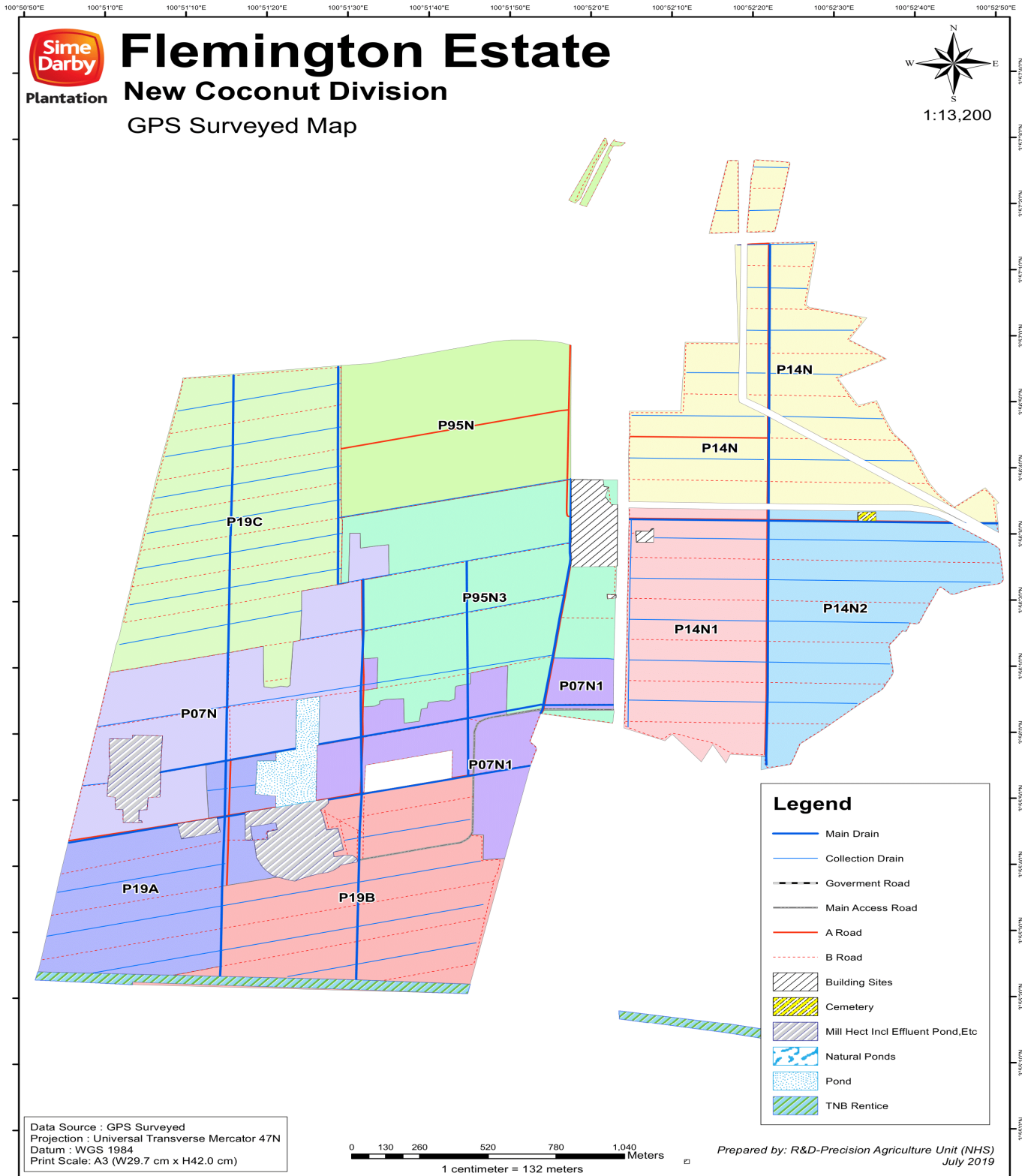


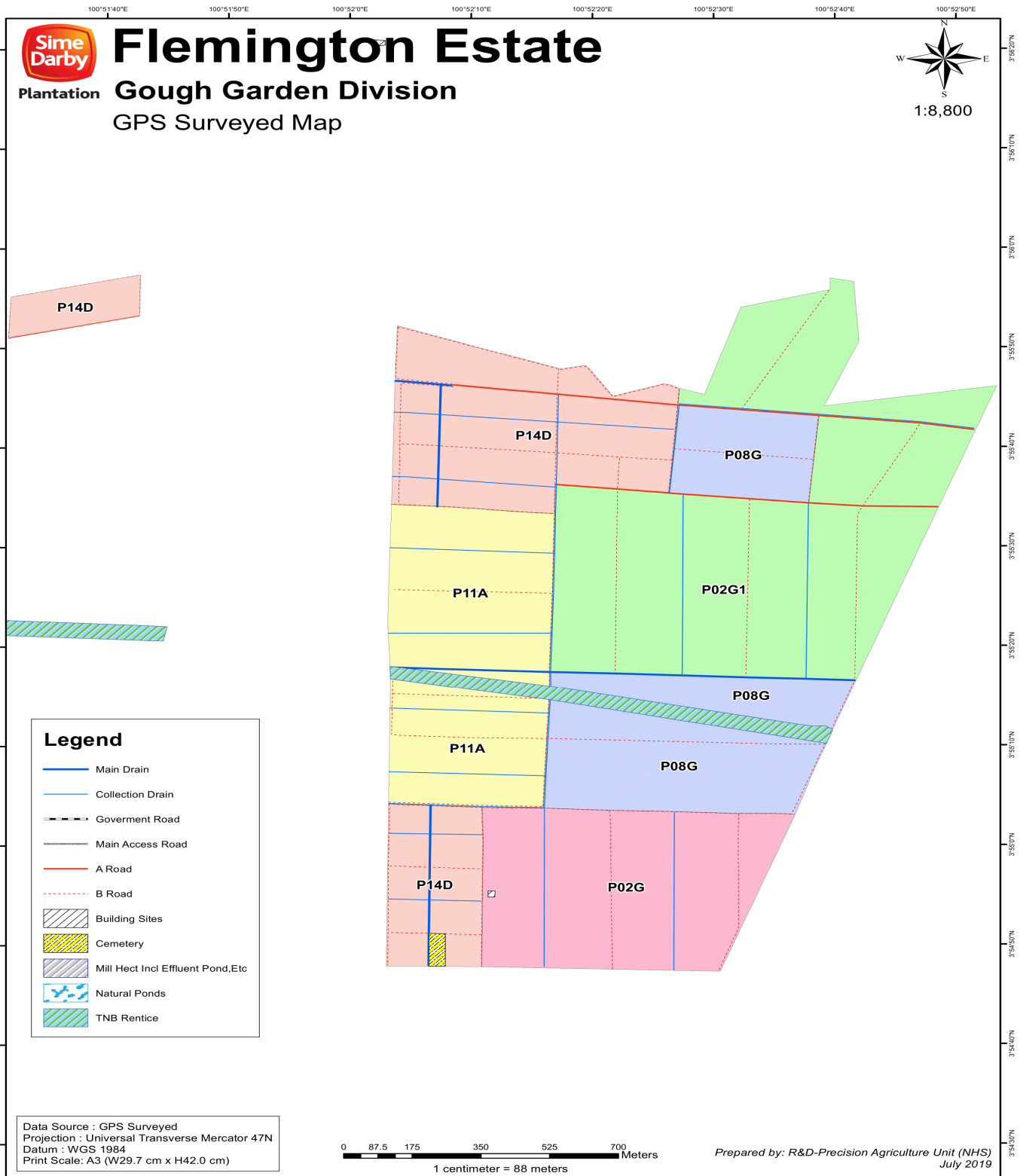
Appendix D: Estate Field Map

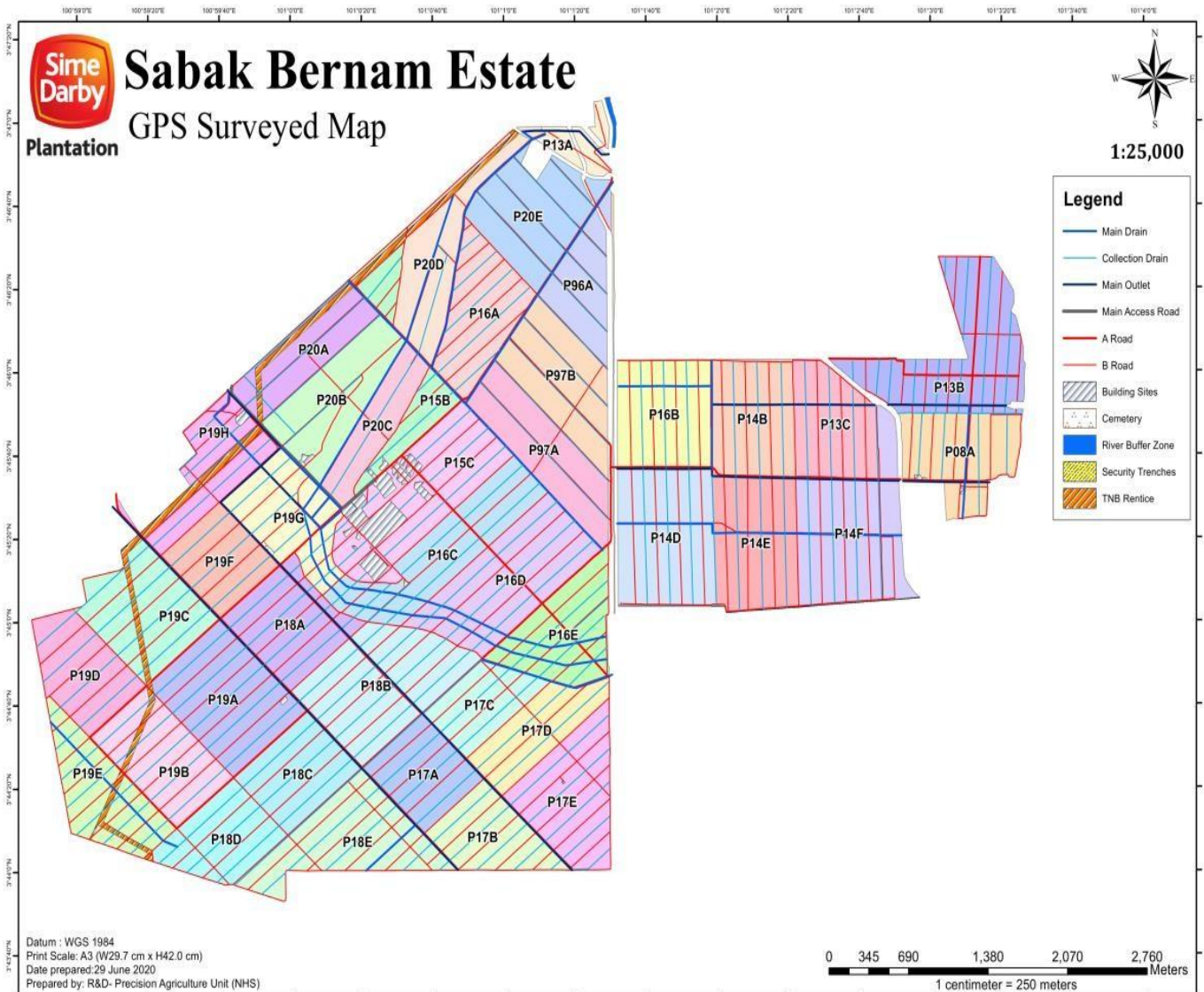




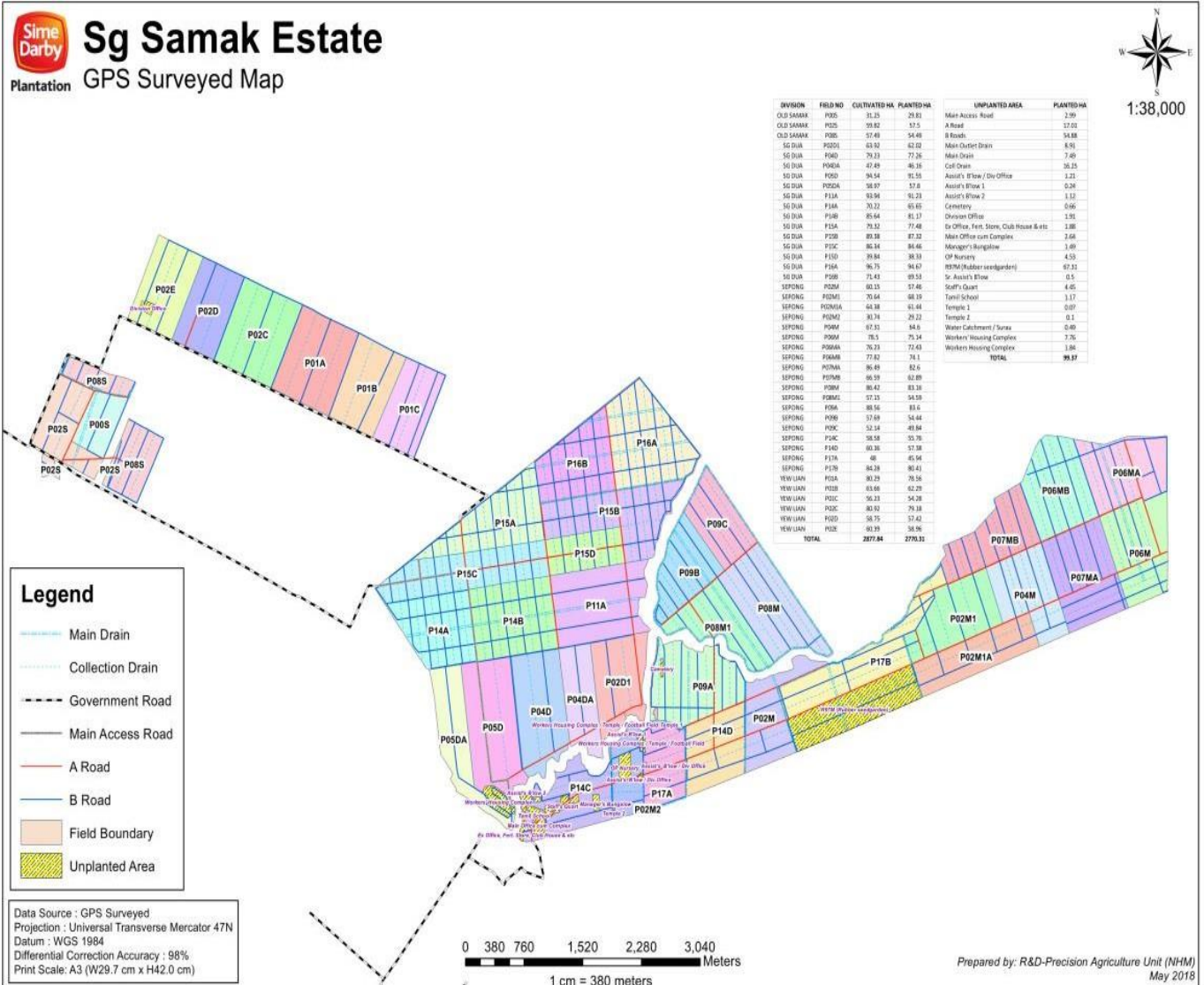








RSPO P&C Public Summary Report Revision 12 (Jun 2021)



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